



ATTACHMENT D

MITIGATED NEGATIVE DECLARATION

San Marcos Costco Business Center Fuel Facility Project

CUP23-0004

ND25-002

Final Initial Study/Mitigated Negative Declaration
State Clearinghouse No. 2025070440

September 2025

Prepared for:

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

Prepared by:

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942

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San Marcos Costco Business Center Fuel Facility Project
Final Initial Study/Mitigated Negative Declaration

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I. INTRODUCTION

This Final Initial Study/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 Code of Regulations Section 15000 et seq.), and addresses potential environmental impacts associated with the implementation of the San Marcos Costco Business Center Fuel Facility Project (project) in the City of San Marcos. The Draft IS/MND was circulated for a 30-day public review period that started on July 10, 2025, and closed on August 8, 2025 (State Clearinghouse No. 2025070440). Two comment letters were received, and responses to the comments are provided following this preface in Section II.

This Final IS/MND consists of four sections:

- I. **Introduction.** The introduction summarizes the Final IS/MND process and Final IS/MND contents.
- II. **Responses to Comments.** This section addresses comments on the Draft IS/MND received during the public review period. Each comment letter and individual comments bracketed with corresponding responses are presented in a side-by-side format.
- III. **Mitigation Monitoring and Reporting Program.** This section contains the Mitigation Monitoring and Reporting Program (MMRP) for the proposed project.
- IV. **Initial Study.** This section contains the Initial Study prepared for the proposed project. No changes to the IS were warranted based on the comments received on the Draft IS/MND and the absence of clarifications or revisions to the project.

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II. RESPONSES TO COMMENTS

The Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the San Marcos Costco Business Center Fuel Facility Project (project) was distributed for public review on July 10, 2025, initiating a 30-day public review period that ended on August 8, 2025 (State Clearinghouse No. 2025070440). Two comment letters were received before the close of the public comment period. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15074(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.” Additionally, CEQA Guidelines Section 15088(a) states that “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” All comment letters received on the Draft IS/MND were evaluated for environmental issues, and written responses to comments on environmental issues were prepared.” While this CEQA Guideline specifically mentions “Draft EIR,” in practice, it is generally applied to all types of CEQA documents that are circulated for public review, including Negative Declarations and Mitigated Negative Declarations as well. Thus, all comment letters received on the Draft IS/MND were evaluated for environmental issues, and written responses to comments on environmental issues were prepared.

Table 1 provides a list of the comment letters received, including details on the agency or organization that submitted the letter and the date of the letter. This section presents written responses to comments on environmental issues raised in these letters. The written responses describe the disposition of significant environmental issues raised, as required by CEQA Guidelines Section 15088(c). None of the comments necessitated revisions to the IS/MND.

Each of the comment letters received has been alphabetically and numerically coded to facilitate identification and tracking. The letters are divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. The comment number consists of two parts. The first part is the letter of the document, and the second is the number of the comment. Thus, Comment A-1 is the first comment (comment #1) of comment letter A. To aid readers, comments have been reproduced in this document together with corresponding responses on the same page.

Table 1		
COMMENT LETTERS RECEIVED ON THE DRAFT IS/MND		
Comment Letter	Public Agency, Organization, of Individual	Date of Letter
A	California Department of Transportation	August 6, 2025
B	San Diego Archaeological Society	July 12, 2025

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Letter 1. California Department of Transportation

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 985-1587 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov



August 6, 2025

11-SD-78
PM 11.749

San Marcos Costco Business Center Fuel Facility Project
MND/SCH#2025070440

Ms. Sarah Cluff
Associate Planner
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92060

Dear Ms. Cluff:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the San Marcos Costco Business Center Fuel Facility Project located near State Route 78 (SR-78). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of San Marcos in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections

"Improving lives and communities through transportation."

A-1 This is an introductory statement that provides general information about Caltrans, its goals, and commitment to collaborate with the City of San Marcos for the project. As this comment does not raise any environmental issues with respect to the adequacy of the Draft IS/MND, no further response is required.

Ms. Sarah Cluff, Associate Planner
August 6, 2025
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between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Traffic Engineering & Analysis

- Please provide 95th percentile queue length analysis for all legs, like Table 27 on page 75, for the following interchanges:
 - SR-78 WB exit ramp to Las Posas Road (Node 1)
 - SR-78 EB exit ramp to Las Posas Rd (Node 3)
 - SR-78 EB exit ramp to San Marcos Blvd. (Node 9)
 - SR-78 WB exit ramp to San Marcos Blvd. (Node 10)
- SR-78 EB exit ramp to Las Posas Road (Node 3), 2025 Near-Term scenario shown in Figure 6B, "Trip Assignment: Total External Trips PM Peak Hour", indicates 89 PM peak hour project trips for the southbound left (SBL) movement. However, the Synchro file for the 2025 Near-Term without project shows 382 trips, and with project shows 411 trips, a difference of only 29 trips instead of the expected 89 trips. Please revise synchro and provide the 95th percentile queue length.
- SR-78 WB exit ramp to San Marcos Blvd (Node 10), 2025 Near-Term scenario shown in Figure 6B "Trip Assignment: Total External Trips PM Peak Hour" indicates 96 PM peak hour project trips for the northbound left (NBL) movement. However, the Synchro file for 2025 Near-Term without project shows 885 and with project shows 947 trips, a difference of only 62 trips instead of the expected 96 trips. Please revise synchro and provide the 95th percentile queue length.
- The SimTraffic calibration for the peak hour must be set up with a minimum "Seeding" of 10 minutes and "Recording" time of 60 minutes, rather than just 10 minutes. Please revise and resubmit.
- Please provide updated synchro files including the existing plus project and 2050 Horizon Without Project scenarios for all project conditions.

Hauling

Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>

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A-2 As noted in Section XVII.a of the IS/MND, the effect of a project on traffic delay is not a significant impact under CEQA and level of service (LOS) or other measures of vehicle capacity or traffic congestion are no longer the performance metric to evaluate transportation impacts under CEQA. Thus, while the comment does not raise any environmental issues with respect to the adequacy of the Draft IS/MND, the following is provided for informational purposes. Table 1 provides the 95th percentile queue lengths for the requested intersections, consistent with Caltrans methodology for queuing analysis.

Table 1. 95th Percentile Queue Summary for Caltrans Maintained Intersections

Int #	Intersection	Lane Group	Storage (ft)	2025 Background (Without Project)			2025 Total (With Project)		
				AM	PM	SAT	AM	PM	SAT
1	SR-78 WB / Las Posas	WBL	350	515	343	303	515	343	303
		WBLTR	1,025 (400 ¹)	748	360	388	748	360	388
		NBL	310	315	405	495	608	495	798
		NBT	-	100	163	85	100	158	88
		SBTR	-	368	360	308	370	408	313
3	SR-78 EB / Las Posas	EBL	100	142	177	186	142	177	186
		EBT	-	114	191	157	124	204	190
		EBR	150	31	21	28	31	21	28
		WBL	130	68	124	126	68	124	126
		WBTR	-	90	190	157	136	273	226
		NBL	160	75	217	140	75	217	140
		NBT	-	77	221	205	77	221	205
		NBR	160	0	0	0	0	0	0
		SBL	225	189	368	140	244	520	207
		SBTR	1,030 (420 ¹)	714	639	461	714	639	461
9	SR-78 EB / San Marcos	EBT	-	73	163	155	75	165	160
		EBR	360	73	213	315	85	238	353
		WBL	315	28	65	118	28	65	118
		WBT	-	60	75	190	65	83	205
		SBL	200	30	48	73	33	48	73
		SBR	300	20	50	220	20	50	220
10	SR-78 WB / San Marcos	EBL	250	73	43	130	75	118	130
		EBT	-	165	310	138	168	315	145
		EBR	800	55	83	83	55	83	83
		WBT	-	238	223	213	243	228	218
		WBR	100	63	78	53	63	78	53
		NBL	450	280	305	280	300	330	300
		NBTR	1,020 (450 ¹)	115	150	103	115	150	105
		SBL	250	133	128	68	133	130	68
		SBR	250	0	0	0	0	0	0

¹ Available storage in parentheses was estimated by subtracting the minimum AASHTO stopping sight distance for a 65-mph (645 feet) facility from the existing length of the ramp between the stop bar and the gore point along SR-78, provided for consideration of locations where deceleration may begin on the mainline prior to the gore. However, at these locations the queue is not expected to extend beyond the gore.

As shown in the table, queue lengths exceed storage capacity at two State Route 78 (SR-78) intersections, as described below.

Intersection #1 (SR-78 WB/Las Posas): Under Year 2025 conditions (with or without the project), the northbound approach experiences 95th percentile queues that extend beyond the available storage within the left-turn lane. However, based on the high proportion of

northbound left turns, drivers are likely positioning to make this turn well in advance of the intersection, potentially south of Grand Avenue, and the inside lane between Grand Avenue and SR-78 is acting as a de facto extension of the left-turn lane. Drivers not making the northbound left turn will likewise position themselves in the other lanes for more even lane utilization. Because extending the left-turn bay is infeasible due to physical constraints (the SR-78 overpass bridge structure), no improvements are recommended.

95th percentile queues at the westbound approach exceed available storage during the weekday AM peak hour; however, the project does not contribute additional vehicles to the queue. No improvements are recommended.

Intersection #3 (SR-78 EB / Las Posas): Under Year 2025 conditions (without the project), the intersection already operates at an unacceptable LOS. With the project in place, the intersection continues to operate at an unacceptable LOS; however, this deficiency is a cumulative condition and is not directly attributable to the project. The project contributes 7.3% of the trips at this intersection, representing a minimal share of the overall demand. Under Year 2025 conditions with project conditions, more than two seconds of delay are added at an already deficient intersection, so the project applicant, in coordination with the City of San Marcos, identified a feasible strategy to improve conditions, consisting of signal timing adjustments and a fair-share contribution toward the addition of a separate southbound right-turn lane. The project's fair-share contribution was calculated using Caltrans methodology, reflecting its incremental share of the cumulative need for the improvement. Implementation of these improvements would restore the intersection to an acceptable LOS, improving conditions compared to the existing baseline.

The project applicant has agreed to contribute a fair-share fee in lieu of constructing the improvements, consistent with the City's approach for other recently approved developments, as identified in Section 1.1

(Circulation and Parking) and Section XVII.a of the IS/MND. It is noted that this intersection is the same as the Grand Avenue/Via Vera Cruz/SR-78 EB intersection identified for off-site improvements in the IS/MND and Local Transportation Analysis (LTA). The addition of a dedicated right-turn lane not only improves overall operations but also removes right-turning vehicles from the shared through-right lane, thereby increasing effective queueing capacity. Although left-turn demand exceeds the left-turn storage length, the total queue length is not expected to exceed 657 feet during the PM peak --well below the 1,030 feet of available storage on the off-ramp --thus avoiding spillback onto the SR-78 mainline. By reducing congestion in the shared through-right lane, left-turning vehicles are able to access the left-turn lane more efficiently. This separation of movements increases the overall capacity of the intersection and improves traffic flow for both right- and left-turning vehicles.

Table 2 presents the 95th percentile queue results under Year 2025 with project conditions, with the southbound right-turn lane improvement in place.

Table 2. 95th Percentile Queue at SR-78 EB / Las Posas Road Under Improved Conditions

Int #	Intersection	Lane Group	Storage (ft)	2025 Total (With Project + SBR Improvement)		
				AM	PM	SAT
3	SR-78 EB / Las Posas	EBL	100	140	233	188
		EBT	-	122	213	151
		EBR	150	30	26	21
		WBL	130	68	129	130
		WBTR	-	136	184	154
		NBL	160	75	230	136
		NBT	-	77	233	185
		NBR	160	0	0	0
		SBL	225	248	425	240
		SBTR	1,030 (420 ¹)	180	162	240
		SBR	200 ²	62	70	60

¹ Available storage in parentheses was estimated by subtracting the minimum AASHTO stopping sight distance for a 65-mph (feet) facility from the existing length of the ramp between the stop bar and the gore point along SR-78, provided for consideration locations where deceleration may begin on the mainline prior to the gore. However, at these locations the queue is not expected to extend beyond the gore.

² Available storage estimated from preliminary ramp improvement design as provided by Kittelson to support free-flow calculations.

As demonstrated in Table 2, the identified southbound right-turn improvement (for which Costco has agreed to pay a fair share fee in lieu) reduces the 95th percentile queues for southbound (off-ramp) movements from a combined 1,159 feet to a combined 657 feet (the sum of the southbound left, southbound through, and southbound right lanes) during the critical weekday PM peak hour.

While the estimated queue length for the southbound left-turn movement (reduced from 520 feet to 425 feet with the improvement in the PM peak hour) is still estimated to exceed the available storage within the left-turn lane, in a hypothetical scenario where the southbound left-turn queue might temporarily block access to the southbound through and right-turn movements and result in stacked queuing, the combined queue for southbound movements (657 feet) would still be contained on the ramp without encroaching on the gore point along SR-78. No additional improvements are recommended.

The northbound left turn and eastbound left turn also experience 95th percentile queues that exceed available storage during; however, the project does not contribute additional vehicles to these queues. No improvements are recommended.

A-3 The southbound left movement trips/volumes in the LTA figures are accurate and consistent with the Synchro output reports provided in LTA Appendix I and LTA Appendix J (322 without project; 411 with project). The Synchro file initially provided to Caltrans seems to have been incorrect. The correct Synchro file was provided to Caltrans. No updates or revisions to the Synchro files, LTA, or IS/MND are necessary.

A-4 The northbound left movement trips/volumes in the LTA figures are accurate and consistent with the Synchro output reports provided in LTA Appendix I and LTA Appendix J (851 without project; 947 with project). The Synchro file initially provided to Caltrans seems to have been incorrect. The correct Synchro file has been provided to Caltrans.

COMMENTS

RESPONSES

No updates or revisions to the Synchro files, LTA, or IS/MND are necessary.

A-5 All queue analyses for all study intersections were conducted in accordance with the City of San Marcos Transportation Impact Analysis Guidelines. A supplemental microsimulation using SimTraffic was also undertaken to provide an additional evaluation of the unusual roadway geometry along Grand Avenue, where the short segment between the skewed intersections of Linda Vista Drive and Bent Avenue presented unique conditions. The SimTraffic model was calibrated using a seeding period of 10 minutes and a recording time of 60 minutes. No updates or revisions to the additional SimTraffic analysis, LTA, or IS/MND are necessary.

A-6 The requested 2025 Near-Term Without Project Synchro file has been provided to Caltrans. No updates or revisions to the Synchro files, LTA, or IS/MND are necessary.

A-7 To the extent that oversize/overweight construction vehicles use Caltrans facilities, the Project Applicant/Owner or Construction contractor will obtain the appropriate permit. As the comment does not raise any environmental issues with respect to the adequacy of the Draft IS/MND, no further response is required.

Ms. Sarah Cluff, Associate Planner
August 6, 2025
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Potential impacts to the highway facilities (SR-78) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

Environmental

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' Right-of-Way (R/W) through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the Environmental Document that Caltrans will use for our subsequent environmental compliance.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's Final Environmental Document.

Right-of-Way

Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

- require a Caltrans Encroachment Permit
- have completed the Caltrans Local Development Review (LDR) process
- have an approved environmental document

need to have documents submitted for Quality Management Assessment Process (QMAP) process via email to D11.QMAP.Permits@dot.ca.gov. Early coordination with Caltrans is strongly advised for all encroachment permits.

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A-8 The project does not propose any physical improvements within the Caltrans right-of-way. Thus, no encroachment permit is required. As the comment does not raise any environmental issues with respect to the adequacy of the Draft IS/MND, no further response is required.

A-9 The project does not propose any physical improvements within the Caltrans right-of-way. Thus, no encroachment permit or other listed requirements are necessary. As the comment does not raise any environmental issues with respect to the adequacy of the Draft IS/MND, no further response is required.

Ms. Sarah Cluff, Associate Planner
August 6, 2025
Page 4

If you have any questions or concerns, please contact Shannon Aston, LDR
Coordinator, at (619) 992-0628 or by e-mail sent to shannon.aston@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review

"Improving lives and communities through transportation."

Letter 2. San Diego County Archaeological Society, Inc.**San Diego County Archaeological Society, Inc.**

Environmental Review Committee

July 12, 2025

To: Ms. Sarah Cluff, Associate Planner
Planning Division
City of San Marcos
1 Civic Center Drive
San Marcos, California 92069-2918

Subject: Draft Mitigated Negative Declaration
Costco Wholesale
CUP23-0004, ND25-002

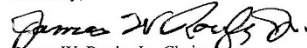
Dear Ms. Cluff:

I have reviewed the subject DMND on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DMND and its Appendix B, we concur with the recommended mitigation measures for cultural resources.

SDCAS appreciates the opportunity provided to review and comment on this project's environmental documents.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Helix Environmental
SDCAS President
File

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

B-1 This comment notes that the San Diego Archaeological Society Environmental Review Committee has reviewed the Draft Initial Study/Mitigated Negative Declaration and concurs with the recommended mitigation measures related to cultural resources. No response is required.



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III. MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA; California Public Resources Code §21081.6 and CEQA Guidelines Section 15074 (d)) requires public agencies to adopt a Mitigation Monitoring and Reporting Program (MMRP) to ensure that mitigation measures and revisions identified in the Initial Study/Mitigated Negative Declaration (IS/MND) are implemented. This MMRP has been prepared for the San Marcos Costco Business Center Fuel Facility Project (project) proposed by Costco Wholesale and being carried forward for approval by the City of San Marcos (City), the environmental effects of which have been evaluated in an IS/MND prepared in compliance with CEQA and the CEQA Guidelines. The proposed project is located within the City, and the City is the Lead Agency under CEQA and has approval authority over the proposed project.

The following MMRP identifies the mitigation measures that shall be implemented by the project applicant/owner; the timing of implementation; and monitoring, enforcement, and reporting responsibilities. These responsibilities may be delegated to another entity that accepts the delegation (such as a construction contractor); however, until the mitigation measures included in the MMRP have been completed, the City, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the adopted program (CEQA Guidelines §15097[a]).

**Mitigation Monitoring and Reporting Program
for the San Marcos Costco Business Center Fuel Facility Project**

Mitigation Measure	Timing	Monitoring, Enforcement, and Reporting Responsibility
Cultural Resources		
CUL-1 Pre-Excavation Agreement. Prior to the issuance of a Grading Permit, or ground-disturbing activities, the Applicant/Owner shall enter into a Tribal Cultural Resources Treatment and Repatriation Agreement (Pre-Excavation Agreement) with a Traditionally and Culturally Affiliated Native American Tribe (TCA Tribe), identified in consultation with the City. The purpose of the Pre-Excavation Agreement shall be to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection, treatment, and repatriation of Native American human remains, funerary objects, cultural and/or religious landscapes, ceremonial items, traditional gathering areas, and other tribal cultural resources. Such resources may be located within and/or discovered during ground-disturbing and/or construction activities for the proposed project, including any additional culturally appropriate archaeological studies, excavations, geotechnical investigations, grading, preparation for wet and dry infrastructure, and other ground-disturbing activities. Any project-specific Monitoring Plans and/or excavation plans prepared by the project archaeologist shall include the TCA Tribe requirements for protocols and protection of tribal cultural resources that were agreed to during the tribal consultation. The landowner shall relinquish ownership of all non-burial related tribal cultural resources collected during construction monitoring and from any previous archaeological studies or excavations on the project site to the TCA Tribe for proper treatment and disposition per the Pre-Excavation Agreement, unless ordered to do otherwise by responsible agency or court of competent jurisdiction. The requirement and timing of such release of ownership, and the recipient thereof, shall be reflected in the Pre-Excavation Agreement. If the TCA Tribe does not accept the return of the cultural resources, then the cultural resources will be subject to curation.	Prior to issuance of a grading permit of ground disturbance	Applicant/Owner and City of San Marcos
CUL-2 Construction Monitoring. Prior to the issuance of a Grading Permit or ground-disturbing activities, the Applicant/Owner or Grading Contractor shall provide written documentation (either as signed letters, contracts, or emails) to the City's Planning Division stating that a Qualified Archaeologist and Traditionally and Culturally Affiliated Native American monitor (TCA Native American monitor) have been retained at the Applicant/Owner or Grading Contractor's expense to implement the construction monitoring program, as described in the Pre-Excavation Agreement. The Qualified Archaeologist and TCA Native American monitor shall be invited to attend all applicable pre-construction meetings with the General Contractor and/or associated subcontractors to present the construction monitoring program. The Qualified Archaeologist and TCA Native American monitor shall be present on-site during grubbing, grading, trenching, and/or other ground-disturbing activities	Prior to issuance of a grading permit of ground disturbance	Applicant/Owner or Construction Contractor

Mitigation Measure	Timing	Monitoring, Enforcement, and Reporting Responsibility
that occur in areas of native soil or other permeable natural surfaces that have the potential to unearth any evidence of potential archaeological resources or tribal cultural resources. In areas of artificial paving, the Qualified Archaeologist and TCA Native American monitor shall be present on-site during grubbing, grading, trenching, and/or other ground-disturbing activities that have the potential to disturb more than six inches below the original pre-project ground surface to identify any evidence of potential archaeological or tribal cultural resources. No monitoring of fill material, existing or imported, will be required if the General Contractor or developer can provide documentation to the satisfaction of the City that all fill materials being utilized at the site are either: 1) from existing commercial (previously permitted) sources of materials; or 2) are from private or other non-commercial sources that have been determined to be absent of tribal cultural resources by the Qualified Archaeologist and TCA Native American monitor. The Qualified Archaeologist and TCA Native American monitor shall maintain ongoing collaborative coordination with one another during all ground-disturbing activities. The requirement for the construction monitoring program shall be noted on all applicable construction documents, including demolition plans, grading plans, etc. The Applicant/Owner or Grading Contractor shall provide written notice to the Planning Division and the TCA Tribe, preferably through e-mail, of the start and end of all ground-disturbing activities. Prior to the release of any grading bonds, or prior to the issuance of any project Certificate of Occupancy, an archaeological monitoring report, which describes the results, analysis, and conclusions of the construction monitoring shall be submitted by the Qualified Archaeologist, along with any TCA Native American monitor's notes and comments received by the Qualified Archaeologist, to the Planning Division Manager for approval. Once approved, a final copy of the archaeological monitoring report shall be retained in a confidential City project file and may be released, as a formal condition of AB 52 consultation, to the Pechanga Band of Indians, San Luis Rey Band of Mission Indians, and Rincon Band of Luiseño Indians, or any parties involved in the project-specific monitoring or consultation process. A final copy of the report, with all confidential site records and appendices, will also be submitted to the South Coastal Information Center after approval by the City.		
CUL-3 Unanticipated Discovery Procedures. Both the Qualified Archaeologist and the TCA Native American monitor may temporarily halt or divert ground-disturbing activities if potential archaeological resources or tribal cultural resources are discovered during construction activities. Ground-disturbing activities shall be temporarily directed away from the area of discovery for a reasonable amount of time to allow a determination of the resource's potential significance. Isolates and clearly non-significant archaeological resources (as determined by the Qualified Archaeologist, in consultation with the TCA Native American monitor) will be minimally documented in the field.	During ground disturbing activities	Qualified Archaeologist and TCA Native American monitor

Mitigation Measure	Timing	Monitoring, Enforcement, and Reporting Responsibility
All unearthed archaeological resources or tribal cultural resources will be collected, temporarily stored in a secure location (or as otherwise agreed upon by the Qualified Archaeologist and the TCA Tribe), and repatriated according to the terms of the Pre-Excavation Agreement, unless ordered to do otherwise by responsible agency or court of competent jurisdiction. If a determination is made that the archaeological resources or tribal cultural resources are considered potentially significant by the Qualified Archaeologist, the TCA Tribe, and the TCA Native American monitor, then the City and the TCA Tribe shall determine, in consultation with the Applicant/Owner and the Qualified Archaeologist, the culturally appropriate treatment of those resources. If the Qualified Archaeologist, the TCA Tribe, and the TCA Native American monitor cannot agree on the significance or mitigation for such resources, these issues will be presented to the Planning Division Manager for decision. The Planning Division Manager shall make a determination based upon the provisions of CEQA and California Public Resources Code Section 21083.2(b) with respect to archaeological resources and California Public Resources Sections 21704 and 21084.3 with respect to tribal cultural resources, and shall take into account the religious beliefs, cultural beliefs, customs, and practices of the TCA Tribe. All sacred sites, significant tribal cultural resources, and/or unique archaeological resources encountered within the project area shall be avoided and preserved as the preferred mitigation. If avoidance of the resource is determined to be infeasible by the City as the Lead Agency, then the City shall require additional culturally appropriate mitigation to address the negative impact to the resource, such as, but not limited to, the funding of an ethnographic study and/or a data recovery plan, as determined by the City in consultation with the Qualified Archaeologist and the TCA Tribe. The TCA Tribe shall be notified and consulted regarding the determination and implementation of culturally appropriate mitigation and the drafting and finalization of any ethnographic study and/or data recovery plan, and/or other culturally appropriate mitigation. Any archaeological isolates or other cultural materials that cannot be avoided or preserved in place as the preferred mitigation shall be temporarily stored in a secure location on-site (or as otherwise agreed upon by the Qualified Archaeologist and TCA Tribe), and repatriated according to the terms of the Pre-Excavation Agreement, unless ordered to do otherwise by responsible agency or court of competent jurisdiction. The removal of any artifacts from the project site will be inventoried with oversight by the TCA Native American monitor. If a data recovery plan is authorized as indicated above and the TCA Tribe does not object, then an adequate artifact sample to address research avenues previously identified for sites in the area will be collected using professional archaeological collection methods.		

Mitigation Measure	Timing	Monitoring, Enforcement, and Reporting Responsibility
If the Qualified Archaeologist collects such resources, the TCA Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the Qualified Archaeologist does not collect the cultural resources that are unearthed during the ground-disturbing activities, the TCA Native American monitor may, at their discretion, collect said resources for later reburial or storage at a local curation facility, as described in the Pre-Excavation Agreement. In the event that curation of archaeological resources or tribal cultural resources is required by a superseding regulatory agency, curation shall be conducted by an approved local facility within San Diego County, and the curation shall be guided by the California State Historical Resources Commission's Guidelines for the Curation of Archaeological Collections. The City shall provide the Applicant/Owner with final curation language and guidance on the project grading plans prior to issuance of the grading permit, if applicable, during project construction. The Applicant/Owner shall be responsible for all repatriation and curation costs and provide to the City written documentation from the TCA Tribe or the curation facility, whichever is most applicable, that the repatriation and/or curation have been completed.		
CUL-4 Human Remains. As specified by California Health and Safety Code Section 7050.5, if human remains, or remains that are potentially human, are found on the project site during ground-disturbing activities or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Medical Examiner's Office by telephone. No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains (as determined by the Qualified Archaeologist and/or the TCA Native American monitor) shall occur until the Medical Examiner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the Qualified Archaeologist and/or the TCA Native American monitor), and consultation and treatment could occur as prescribed by law. As further defined by State law, the Medical Examiner will determine within two working days of being notified if the remains are subject to his or her authority. If the Medical Examiner recognizes the remains to be Native American, and not under his or her jurisdiction, then he or she shall contact the NAHC by telephone within 24 hours. The NAHC will make a determination as to the Most Likely Descendent (MLD), who shall be afforded 48 hours from the time access is granted to the discovery site to make recommendations regarding culturally appropriate treatment. If suspected Native American remains are discovered, the remains shall be kept in situ (in place) until after the Medical Examiner makes its determination and notifications, and until after the MLD is identified, at which time the archaeological examination of the remains shall only occur on-site in the presence of the MLD. The specific locations of Native American burials and reburials will be	During ground disturbing activities	Applicant/Owner or Construction Contractor

Mitigation Measure	Timing	Monitoring, Enforcement, and Reporting Responsibility
proprietary and not disclosed to the general public. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). In the event that the Applicant/Owner and the MLD are in disagreement regarding the disposition of the remains, State law will apply, and the mediation process will occur with the NAHC. In the event that mediation is not successful, the landowner shall rebury the remains at a location free from future disturbance (see Public Resources Code Section 5097.98(e) and 5097.94(k)).		
Geology and Soils		
GEO-1 Personnel and Repository (pre-construction). Prior to the commencement of construction, a qualified project Paleontologist shall be retained to oversee the limited paleontological mitigation program (a project Paleontologist is a person with a Ph.D. or Master's Degree in Paleontology or related field, and who has knowledge of San Diego County paleontology and documented experience in professional paleontological procedures and techniques). In addition, an appropriate regional fossil repository shall be designated to receive any discovered fossils (e.g., the San Diego Natural History Museum).	Prior to construction	Applicant/Owner or Construction Contractor
GEO-2 Meeting (pre-construction). The project Paleontologist should attend the project pre-construction meeting to consult with the grading and excavation contractors and City environmental and engineering staff concerning excavation schedules, paleontological field techniques, and safety issues.	Prior to construction	Construction Contractor, Project Paleontologist
GEO-3 Monitoring (during construction). A paleontological monitor (working under the direction of the project Paleontologist) should initially be on-site on a full-time basis during any excavations extending more than 10 feet below ground surface in the eastern and southern portions of the site only, where previously undisturbed deposits of Moderate paleontological sensitivity (e.g., old alluvial flood plain deposits) may be present, in order to inspect exposures for unearthened fossils. Monitoring may be reduced or terminated at the discretion of the project Paleontologist based on the results of initial monitoring.	During construction	Applicant/Owner or Construction Contractor, Project Paleontologist
GEO-4 Fossil Recovery (during construction). If fossils are discovered, the project Paleontologist (or paleontological monitor) should recover them. In most cases, fossil salvage can be completed in a short period of time. However, some fossil specimens (e.g., a bone bed or a complete large mammal skeleton) may require an extended salvage period. In these instances, the project Paleontologist (or paleontological monitor) has the authority to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner.	During construction	Construction Contractor, Project Paleontologist
GEO-5 Treatment (post-construction). Fossil remains collected during monitoring and salvage should be cleaned, repaired, sorted, and cataloged as part of the mitigation program.	Following construction	Construction Contractor, Project Paleontologist

Mitigation Measure	Timing	Monitoring, Enforcement, and Reporting Responsibility
GEO-6 Curation (post-construction). Prepared fossils, along with copies of all pertinent field notes, photos, and maps, should be deposited (as a donation) in the designated fossil repository. Donation of the fossils shall be accompanied by financial support for initial specimen storage.	Following construction	Construction Contractor, Project Paleontologist
Land Use and Planning		
Refer to mitigation measures CUL-1 through CUL-4 and GEO-1 through GEO-6 above		
Tribal Cultural Resources		
Refer to mitigation measures CUL-1 through CUL-4 above.		

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IV. INITIAL STUDY

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San Marcos Costco Business Center Fuel Facility Project

CUP23-0004

Initial Study/Mitigated Negative Declaration

July 2025 | 03605.00004.001

Prepared for:

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

Prepared by:

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
Act	Alquist-Priolo Earthquake Fault Zoning Act
ADA	Americans with Disabilities Act
Attainment Plan	2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFD	Community Facilities District
CH ₄	methane
City	City of San Marcos
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
County	County of San Diego
CRHR	California Register of Historical Resources
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dba	A-weighted decibels
DMA	drainage management areas
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas

ACRONYMS AND ABBREVIATIONS (cont.)

HFC	hydrofluorocarbons
HI	hazard index
I-	Interstate
IS	Initial Study
LED	light-emitting diode
LID	low impact development
LOS	Level of Service
LTA	local transportation analysis
LUST	leaking underground storage tank
MEIR	Maximally Exposed Individual Resident
MEIW	Maximally Exposed Individual Worker
mg/y	million gallons per year
MHCP	Multiple Habitat Conservation Program
MLD	Most Likely Descendant
MND	Mitigated Negative Declaration
MPD	multiple product dispenser
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer Systems
MT	metric ton
MWD	Metropolitan Water District
N ₂ O	nitrous oxide
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NCTD	North County Transit District
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSLU	noise-sensitive land use
OEHHA	Office of Environmental Health Hazards Assessment
PFC	perfluorocarbons
PM ₁₀	particulate matter 10 microns or less in diameter
PM _{2.5}	particulate matter 2.5 microns or less in diameter
POC	point of connection
project	San Marcos Costco Business Center Fuel Facility Project
RAQS	Regional Air Quality Strategy
ROW	right-of-way
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board

ACRONYMS AND ABBREVIATIONS (cont.)

SANDAG	San Diego Association of Governments
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas and Electric
SF	square feet
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SLF	Sacred Lands File
SMFD	San Marcos Fire Department
SMMC	San Marcos Municipal Code
SMNCCP	San Marcos Natural Community Conservation Plan
SO _x	sulfur oxides
SR	State Route
SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCA	Traditionally and Culturally Affiliated
TMDL	total maximum daily load
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
VMT	vehicle miles traveled
VOC	volatile organic compound
VWD	Vallecitos Water District

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1.0 INTRODUCTION

The City of San Marcos (City) is the lead agency under the California Environmental Quality Act (CEQA) responsible for the review and approval of the proposed San Marcos Costco Business Center Fuel Facility Project (project). The proposed project involves the request for approval of a Conditional Use Permit (CUP23-0004) for the construction of a new retail fuel facility at the existing San Marcos Costco Business Center. Based on the findings of the Initial Study (IS) contained in Section 2 of this document, the City has made the determination that a Mitigated Negative Declaration (MND) is the appropriate environmental document to be prepared in compliance with CEQA. This section includes a description of the proposed project and is used as the basis for analyzing the project's impacts on the existing physical environment throughout the IS Checklist.

1.1 Initial Study Information Sheet

- | | |
|----------------------------------|---|
| 1. Project Title: | San Marcos Costco Business Center Fuel Facility |
| 2. Lead Agency: | City of San Marcos
1 Civic Center Drive
San Marcos, CA 92069 |
| 3. Contact Person: | Sarah Cluff, Associate Planner
(760) 744-1050 ext. 3227
scluff@san-marcos.net |
| 4. Project Location: | 150 South Bent Avenue
San Marcos, CA 92078 |
| 5. Project Sponsor: | Costco Wholesale
999 Lake Drive
Issaquah, WA 98027 |
| 6. General Plan Designation: | Commercial |
| 7. Zoning: | Commercial |
| 8. Project Location and Setting: | |

The project is proposed on a 2.4-acre portion (referred to as the "project development area") of a 14.1-acre parcel (Assessor's Parcel Number 219-331-43-00) located in the western portion of the City of San Marcos, which is within the City's Business/Industrial District as designated by the City's General Plan. The project site encompasses the entire 14.1-acre Costco property and is located at 150 South Bent Avenue, northwest of the intersection of South Bent Avenue and West San Marcos Boulevard. The project site is located approximately 100 feet south, across Grand Avenue, from State Route (SR) 78, and 4.5 miles west of Interstate (I-) 15. Figure 1, *Regional Location*, depicts the project site in relation to the County of San Diego (County). Figure 2, *Aerial Photograph*, shows an aerial photograph of the existing conditions at and surrounding the project site.

The project site is generally flat at an elevation ranging between approximately 541 and 545 feet above mean sea level and is developed with paved surface parking associated with the San Marcos Costco Business Center that occupies the southern portion of the project site.

The existing General Plan land use designation and zoning for the project site is “Commercial.” Existing land uses surrounding the project site include commercial uses to the south; commercial and industrial uses to the east and northeast (across South Bent Avenue); commercial uses to the north (across SR 78); and open space, industrial, commercial, and mixed uses to the west (see Figure 2).

9. Project Description:

The proposed project involves the request for approval of a Conditional Use Permit (CUP23-0004) for the addition of a new retail fuel dispensing facility within the project site. The components of the project are further described below. No change to the existing land use or zoning designations for the site is proposed.

Building Program

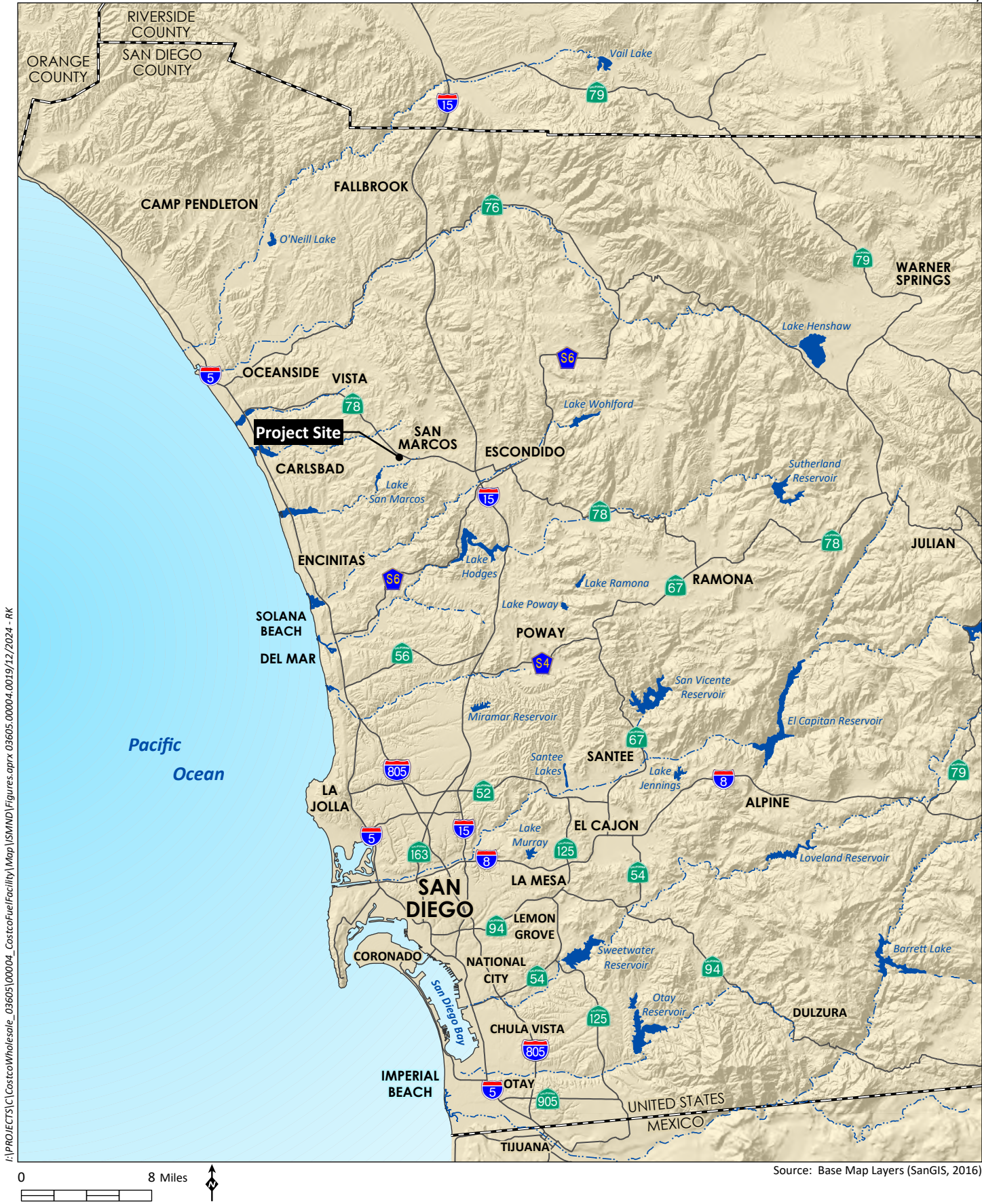
The proposed retail fuel dispensing facility would include 18 multiple product dispensers (MPDs) with 36 fueling positions, an approximately 16,090-square foot (SF) (173.7 feet by 92.7 feet) fueling canopy, three 40,000-gallon underground storage tanks (USTs) for gasoline, one 1,500-gallon UST for gasoline additive, and a 271-SF mechanical room/storage area. Figure 3, *Site Plan*, shows the proposed development and component identifiers.

Figure 4, *Sample Building Elevation*, shows the architectural style of the proposed fuel facility. The fueling station would utilize steel tube columns with a concrete masonry unit (CMU) block wrap, and a prefinished metal fascia panel canopy. The exterior color palette would be comprised of black, blue, red, and shades of gray. The proposed fueling station would be a maximum of 17.5 feet in height above the ground.

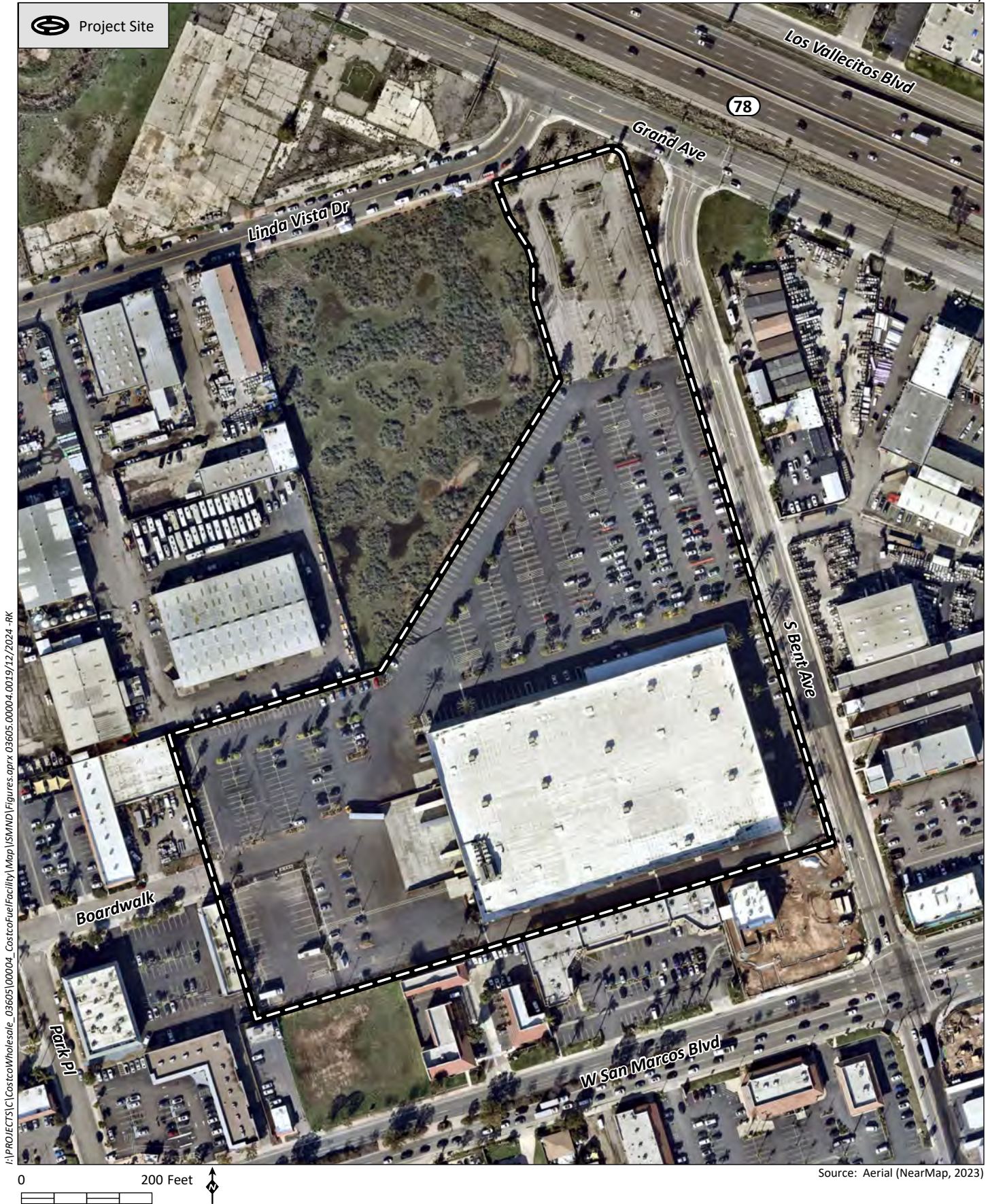
Circulation and Parking

The new fuel facility would provide for approximately 160 linear feet of usable queue space for each of the six queue lines for up to approximately 50 vehicles to line up and wait for available fuel dispensers. Access to the new fuel facility would be provided internally and directed one way, with ingress at the southwestern portion of the facility and egress at the northwestern portion. The project would relocate the existing northern project site driveway on South Bent Avenue approximately 150 feet to the south. An additional driveway would be added to allow fuel delivery trucks to exit the project on Linda Vista Drive and would not be accessible to passenger vehicles. Fuel trucks would access the facility via a one-way route from Grand Avenue, South Bent Avenue, around the south and west sides of the warehouse building, to the fuel facility, and exit onto Linda Vista Drive.

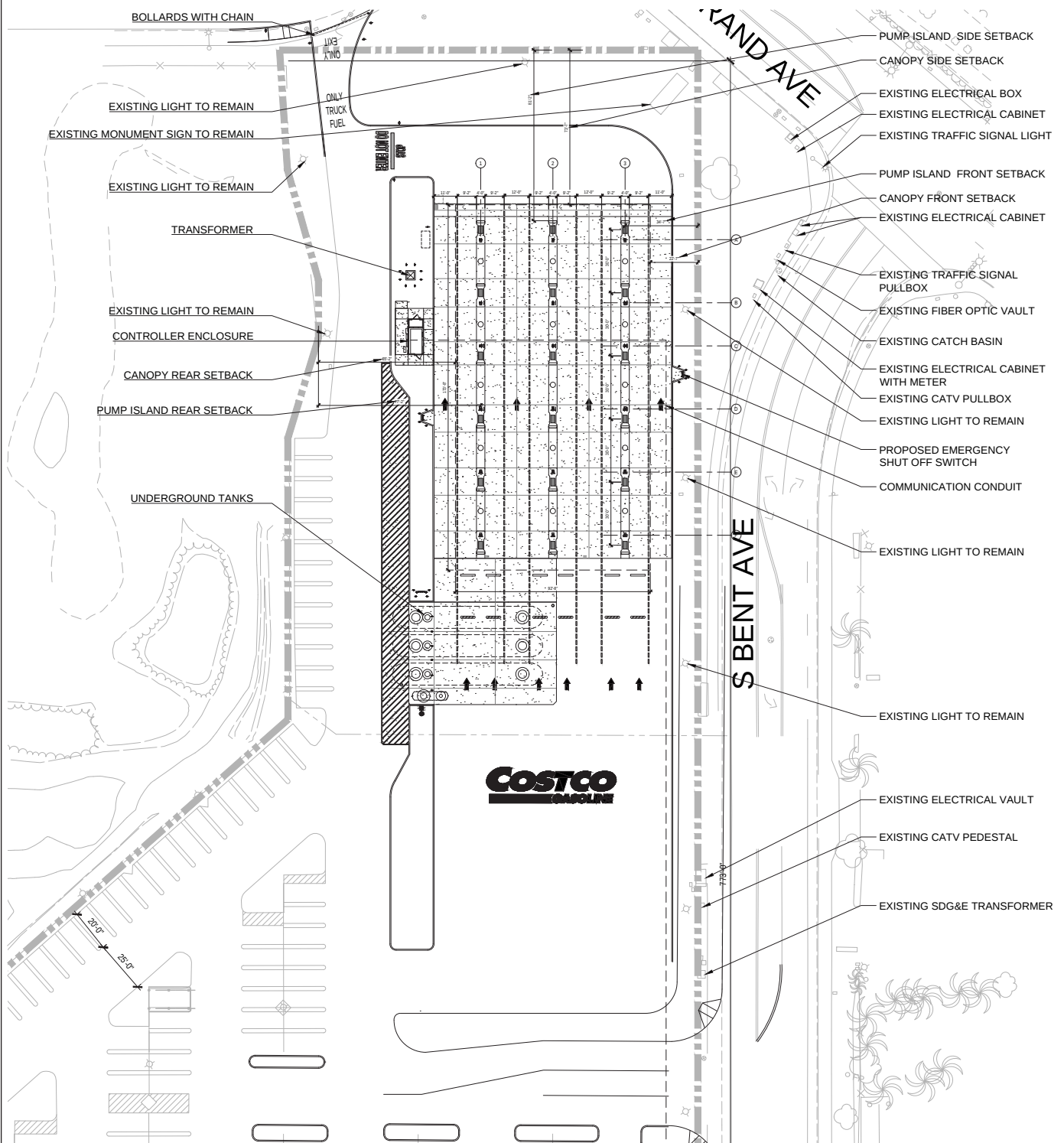
The project would remove 211 of the 794 existing parking stalls from the overall Costco parking lot. Additional site improvements would include new parking lot median islands with landscaping, new sidewalk improvements along the property frontages on Linda Vista Drive, Grand Avenue, and South Bent Avenue, and new parking lot striping.



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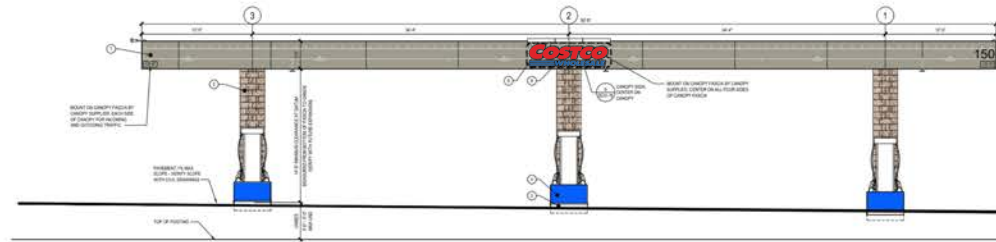


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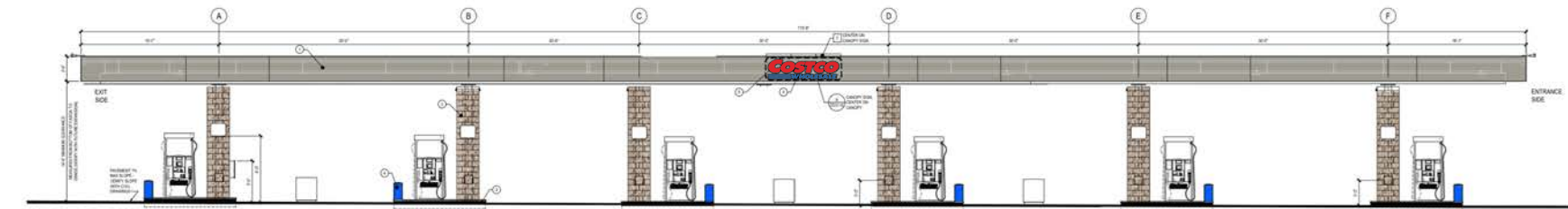
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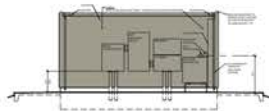
1 NORTH ELEVATION
SCALE: 3/16" = 1'-0"

0415



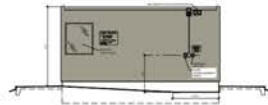
2 WEST ELEVATION
SCALE: 3/16" = 1'-0"

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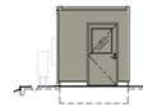
3 SIDE FACING AWAY FROM CANOPY
SCALE: 3/16" = 1'-0"

1121



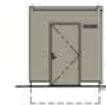
4 SIDE FACING CANOPY
SCALE: 3/16" = 1'-0"

0421



5 ELECTRICAL ENTRY
SCALE: 3/16" = 1'-0"

1222



6 STORAGE ENTRY
SCALE: 3/16" = 1'-0"

1222

Source: MG2 2024

In addition, the proposed project includes the following off-site improvements as part of the project:

- Signal timing modifications at the intersections of South Las Posas Road/Grand Avenue and Grand Avenue/Via Vera Cruz/SR 78;
- Monetary fair-share contribution (31.1 percent) to add a separate southbound right-turn lane at the Grand Avenue/Via Vera Cruz/SR 78 intersection;
- Re-striping Linda Vista Drive to provide two 10-foot lanes approaching Grand Avenue;
- Monetary fair-share contribution (10.6 percent) for the installation of a traffic signal at the Grand Avenue/Linda Vista Drive intersection; and
- Class IV bikeway along Grand Avenue between Linda Vista Drive and South Bent Avenue (requires a public pedestrian easement for the portion on site and outside of the City right-of-way).

Landscaping

A total of 13,446 SF of existing on-site landscaping would be retained, 2,428 SF would be removed, and 7,188 SF would be added, resulting in a net increase of 4,703 SF of on-site landscaping (Figure 5, *Conceptual Landscape Plan*). Proposed landscaping would be installed around the fuel facility perimeter and within some parking lot medians and would include a mixture of trees (desert museum palo verde), shrubs (pink rockrose, compact strawberry tree, oleander, roundleaf tea tree, and spreading sunset lantana), and grasses (pink muhly grass). The project would remove 23 of the existing trees on the project site and plant 28 new trees, exceeding a 1:1 replacement ratio. A low-flow irrigation system would be installed, and the project's irrigation water efficiency would meet or surpass the requirements of Assembly Bill (AB) 1881.

Lighting

The project proposes to remove up to nine existing light poles within the site and keep some existing pole-mounted lighting fixtures along the perimeter of the site, which are 29-foot-tall light poles with light-emitting diode (LED) downcast lighting, as well as install new pole-mounted light fixtures within the proposed facility and some parking medians. Approximately 16 existing light poles would be retained, four existing light poles would be relocated within the site, an additional light fixture would be added to one existing light pole, and one new light pole with two fixtures would be installed.

Surface-mounted lighting would also be provided under the canopy that would consist of approximately 46 LED canopy luminaires which would be installed on the underside of the canopy roof to illuminate the fuel facility during nighttime hours.

Utilities

Proposed utilities would tie into existing utility systems in the project vicinity. Water service would continue to be provided by Vallecitos Water District (VWD) via an existing water line within South Bent Avenue. Electricity to the site would continue to be provided by San Diego Gas & Electric (SDG&E) through existing lines and infrastructure along the eastern site boundary within an existing utility

easement. A telecommunications line is proposed within the site that would extend from existing lines within the adjacent roadways.

On-site drainage would be collected, conveyed, and discharged in the northern and southern portions of the site. Proposed drainage facilities in the northern system would include canopy roof drains, curb inlets, catch basins, and storm drain pipes to convey runoff into a modular wetland biofiltration system and underground detention facility, and then pumping water out to an existing storm drain pipe that traverses the northeast corner of the site and continues within South Bent Avenue. Any incidental drainage runoff beneath the canopy would be collected by a ribbon gutter and inlets at the edge of the fuel facility and then routed to a dual stage water/oil separator and oil stop valve in the northern portion of the site.

The southern system would include a series of curb inlets, modular wetland biofiltration systems, and storm drain pipes to convey runoff into a proposed underground detention facility and then pump out the existing storm drain pipe in South Bent Avenue.

Construction Activities

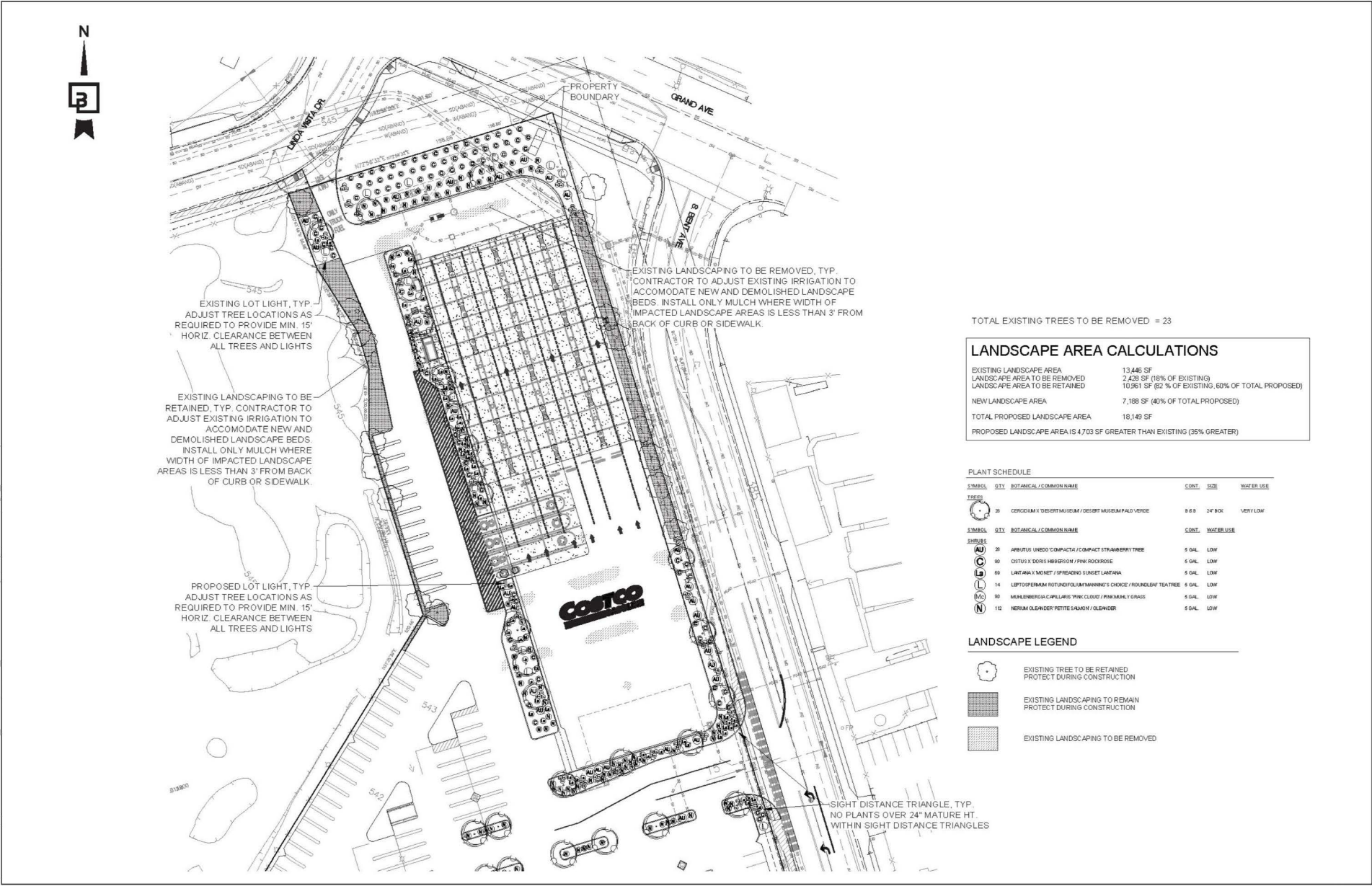
Construction of the project is anticipated to be completed in one phase over an approximately four-month period. Project construction activities would include demolition, grading, underground utilities (including excavation for UTSs), building construction (including installing fueling positions and canopy), architectural coating (e.g., painting), and paving. Staging of construction equipment would occur within the developed portions of the project site. Approximately 3,615 tons of asphalt and concrete are estimated to be exported from the project site during demolition/site preparation, and grading would result in approximately 2,240 cubic yards of soil export.

San Marcos Municipal Code (SMMC) Chapter 10.24.020(b)(9) exempts noise associated with the construction and demolition of buildings between 7:00 a.m. and 6:00 p.m. Monday through Friday and between 8:00 a.m. and 5:00 p.m. on Saturdays from the City's noise limitations. Additionally, SMMC Section 17.32.180 limits grading operations to between 7:00 a.m. and 4:30 p.m. Monday through Friday. Project construction is anticipated to occur within these hours and no nighttime construction is proposed.

10. Required Approvals:

The City has primary approval responsibility for the project and is the CEQA lead agency for the project, pursuant to CEQA Guidelines Section 15050. The Final CEQA document informs state, regional, and local government approvals needed for construction and/or operation of the project, regardless of whether such actions are known at this time or explicitly listed. A list of the anticipated actions under City jurisdiction, as well as other actions from government agencies that may be necessary to fully implement the project, is provided in Table 1, *Project Related Approvals/Permits*.

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TOTAL EXISTING TREES TO BE REMOVED = 23

LANDSCAPE AREA CALCULATIONS

EXISTING LANDSCAPE AREA	13,446 SF
LANDSCAPE AREA TO BE REMOVED	2,428 SF (18% OF EXISTING)
LANDSCAPE AREA TO BE RETAINED	10,961 SF (82 % OF EXISTING, 60% OF TOTAL PROPOSED)
NEW LANDSCAPE AREA	7,188 SF (40% OF TOTAL PROPOSED)
TOTAL PROPOSED LANDSCAPE AREA	18,149 SF
PROPOSED LANDSCAPE AREA IS 4,703 SF GREATER THAN EXISTING (35% GREATER)	

PLANT SCHEDULE

SYMBOL	QTY	BOTANICAL / COMMON NAME	CONT.	SIZE	WATER USE
TREES					
	20	CERCIDIPHYLLUM DESERTI / DESERT MUSEUM PALM / DESERT MUSEUM PALM / DESERT MUSEUM PALM	8.6 B	24" BOD	VERY LOW
SHRUBS					
	20	ARBOREALIS UNDO / COMPACTA / COMPACT STRAWBERRY TREE	5 GAL	LOW	
	90	CISTUS X DORIS / HIBERNIA / PINK ROCK ROSE	5 GAL	LOW	
	90	LANTANA / MONET / SPREADING SUNSET LANTANA	5 GAL	LOW	
	14	LEPTOSPERMUM POTINUM / VOLUMINARIA / CHOICE / ROUNDLEAF TEA TREE	5 GAL	LOW	
	90	MAHONIA / CAPILLARIS / PINK CLOUD / PINK MAHONIA / GRASS	5 GAL	LOW	
	110	NERIUM OLIVACEUM / PETITE LAMAR / OLIVACEUM	5 GAL	LOW	

LANDSCAPE LEGEND

- EXISTING TREE TO BE RETAINED
PROTECT DURING CONSTRUCTION
- EXISTING LANDSCAPING TO REMAIN
PROTECT DURING CONSTRUCTION
- EXISTING LANDSCAPING TO BE REMOVED

Source: MG2 2024

Table 1
PROJECT RELATED APPROVALS/PERMITS

Agency	Approvals and Decisions
Discretionary Approvals	
City of San Marcos	• Adoption of the Final CEQA document • Conditional Use Permit (CUP23-0004)
Non-Discretionary Approvals	
City of San Marcos	• Right-of-Way Permit • Traffic Control Plan • Building Permit • Grading Permit • Public Pedestrian Easement
Regional Water Quality Control Board (RWQCB)	• National Pollutant Discharge Elimination System (NPDES) Construction General Permit
Environmental Protection Agency	• 120-day initial notification for gasoline dispensing facilities • 60-day notification of performance test • 15-day notification of actual date of startup • 60-day Notification of compliance status/testing and reports for gasoline dispensing facilities
California Board of Equalization	• UST registration
San Diego County Department of Environmental Health and Quality	• UST plan check permit • San Diego regional hazardous materials questionnaire • California environmental reporting system
San Diego County Air Pollution Control District (SDAPCD)	• Authority to construct • Permit to operate
San Diego County Department of Agriculture, Weights, and Measurements	• Placed in service reports
SDG&E	• Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities
Vallecitos Water District	• Plan review

11. Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Informal outreach to Native American tribes traditionally and culturally affiliated with the project area occurred during preparation of the project's archaeological survey. Responses were received from the Pechanga Band of Indians, Campo Band of Mission Indians, Rincon Band of Luiseño Indians, San Luis Rey Band of Missions Indians, and San Pasqual Band of Mission Indians, indicating the cultural sensitivity of the project site. Formal consultation with the City was requested by the Pechanga Band of Indians, Rincon Band of Luiseño Indians, and San Luis Rey Band of Mission Indians. The City initiated government-to-government consultation with these tribes in accordance with AB 52 to identify potential tribal cultural resources that would be affected by the project and potential procedures to reduce the effects of the project on these resources. Consultation is ongoing. Please refer to Section

XVIII, *Tribal Cultural Resources*, of this IS for a summary of tribal consultation and analysis of impacts to potential tribal cultural resources.

1.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☐ Air Quality |
| ☐ Biological Resources | ☒ Cultural Resources | ☐ Energy |
| ☒ Geology and Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials |
| ☐ Hydrology and Water Quality | ☒ Land Use and Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population and Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☒ Tribal Cultural Resources |
| ☐ Utilities and Service Systems | ☐ Wildfire | ☒ Mandatory Findings of Significance |

1.3 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 (EIR) 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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Sarah Cluff
Signature

Sarah Cluff, Associate Planner
Printed name

26 June 2025
Date

City of San Marcos
For

2.0 ENVIRONMENTAL INITIAL STUDY CHECKLIST

The lead agency has defined the column headings in the environmental checklist as follows:

- A. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- B. “Less Than Significant with Mitigation Incorporated” applies where the inclusion of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” All mitigation measures are described, including a brief explanation of how the measures reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be cross-referenced.
- C. “Less Than Significant Impact” applies where the project does not create an impact that exceeds a stated significance threshold.
- D. “No Impact” applies where a project does not create an impact in that category. “No Impact” answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

The explanation of each issue identifies the significance criteria or threshold used to evaluate each question; and the mitigation measure identified, if any, to reduce the impact to less than significance. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration [CEQA Guidelines Section 15063(c)(3)(D)]. Where appropriate, the discussion identifies the following:

- a) Earlier Analyses Used. Identifies where earlier analyses are available for review.
- b) Impacts Adequately Addressed. Identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.
- c) Mitigation Measures. For effects that are “Less Than Significant with Mitigation Incorporated,” describes the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

I. Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) *Would the project have a substantial adverse effect on a scenic vista?*

No Impact. A scenic vista is typically defined as a public view of highly valued visual and scenic resources such as the ocean or distant mountain ranges, particularly from public vantage points. As discussed in the City's General Plan, hillside and ridgeline areas visible from the SR 78 corridor and other locations such as parks and scenic roads, are considered valuable. The City's General Plan does not identify any designated scenic vistas but more generally aims to protect the City's scenic resources such as the San Marcos, Merriam, and Double Peak Mountains; creek corridors; mature trees; rock outcroppings; and ocean views (City 2012). The project site is not identified as a scenic vista as it is located within a developed commercial and industrial area. The project site and surrounding valley terrain, within the developed urban area of which the project site is a part, are encompassed by mountains to the south and east, with distant ridgelines visible in horizon views. In addition, the Escondido Creek corridor is located approximately 0.4 mile to the south, which is characterized by both natural and built visual elements. The project site is not visible from the nearby creek corridor nor is the creek corridor visible from the project site due to intervening development.

The project involves the redevelopment of an existing site developed with a paved surface parking lot with medians, landscaping, and lighting ancillary to a commercial use, in an urban area primarily developed with other commercial uses. Proposed structures and associated vertical elements would not be at a height or scale that would block horizon views of the distant ridgelines from nearby public vantage points, including the SR 78 corridor. Similarly, project implementation would not affect views of other scenic vistas in the project vicinity, such as the Escondido Creek corridor.

The City has a Ridgeline Protection and Management Overlay Zone to protect natural viewsheds and unique natural resources, minimize physical impacts to ridgelines, and to establish innovative sensitive architecture standards. The project site is not located in the Ridgeline Protection and Management Overlay Zone. Further, the project site does not include any primary or secondary ridgelines, as identified in Figure 4-5 of the Conservation and Open Element of the General Plan (City 2012). The project site is flat and located at a lower elevation part of the City. Therefore, the project would not have a substantial adverse effect on a scenic vista. No impact would occur.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less Than Significant Impact. The nearest officially designated scenic highway to the project site is SR 52, which is located approximately 21 miles to the south and is not visible from the project site due to distance (California Department of Transportation [Caltrans] 2024). The nearest eligible state scenic highway is I-5, which is located approximately five miles west of the project site and also is not visible from the project site due to distance. SR 78 is located approximately 100 feet north of the project site; however, the section of SR 78 proximate to the project site is not designated as a state scenic highway. Segments of SR 78, east of SR 79 and greater than 25 miles to the east of the project site, are officially designated or eligible for designation. Although the project site is not located within a viewshed of a designated state scenic highway, the City has designated SR 78 as a view corridor to surrounding ridgelines, as stated in the Conservation and Open Space Element of the General Plan (City 2012). The project site would be visible from SR 78, but the project would not impede views of the surrounding hillsides and ridgelines visible from SR 78 due to topography of the project site in relation to these distant ridgelines. As discussed above in Item I(a), project elements would not be at a height or scale to block horizon views of the ridgelines, which are the primary attributes that characterize the City-designated view corridor. In addition, the project site is located on a currently developed site within an urbanized area that does not contain large stands of trees, rock outcroppings, or historic buildings that are considered valued scenic resources. Therefore, the project would not substantially damage scenic resources including within scenic highways. Impacts would be less than significant.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The City is considered an urbanized area pursuant to California Public Resources Code Section 21071. Therefore, the potential impacts to visual character and quality are assessed in relation to conflicts with applicable zoning and other regulations governing scenic quality.

The project site and surrounding area are characterized by urbanizing commercial and industrial land uses that have been implemented according to the City's General Plan. Development surrounding the project site, which currently contains a Costco Business Center, includes commercial to the south; commercial and industrial to the east and northeast (across South Bent Avenue); commercial to the north (across SR 78); and open space, industrial, commercial, and mixed-use to the west (see Figure 2). The project site is zoned Commercial and the proposed project is consistent with this designation. Most of the project site is currently developed with a surface parking lot. The construction of a gas station on the site would not substantially change the existing visual character or quality of the site or surroundings. The project would comply with applicable site development criteria related to scenic

quality contained in the SMMC, such as height limitations and setbacks. For the Commercial zone, maximum building height is 60 feet, and the project proposes structure heights of up to 17.5 feet above the finished floor. Landscaped setbacks in the Commercial zones are a minimum of 10 feet (front, side, and rear), and structural setbacks for any structures i.e. canopies are 15 to 20 feet, and 30 feet for pump islands. The project would be consistent with applicable setback requirements by proposing a minimum landscaped setback distance of approximately 11 feet, approximately 22 feet for the canopy, and approximately 34 feet for the pump islands.

Additionally, the project would comply with applicable landscaping requirements. Therefore, the project would not conflict with applicable zoning or other regulations governing scenic quality. Impacts would be less than significant.

d) Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Less Than Significant Impact. There are two primary artificial sources of light that generally affect an urban environment: light emanating from building interiors that passes through windows to the outside, and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting) that affect the natural ambient light level. The introduction of light can be a nuisance by affecting adjacent areas and diminishing the view of the clear night sky depending on the location of the light sources and its proximity to nearby light-sensitive areas. Existing lighting in the project vicinity is associated with roadway lighting and exterior building lighting for the existing commercial and industrial uses that surround the project site. Redevelopment of a portion of the existing commercial site with a new commercial use would result in sources of light similar to the existing development on the project site.

The project proposes to remove up to nine existing light poles within the site, keep 16 existing light poles, relocate four existing light poles within the site, add an additional light fixture to one existing light pole, and install one new light pole with two fixtures. Additionally, approximately 46 surface-mounted lights would be installed on the underside of the canopy roof to illuminate the fuel facility during nighttime hours. Although the project would result in a net increase in light sources in the area, the increase would not be substantial because the site is already developed, contains existing light sources, and is surrounded by existing lighting associated with adjacent development and roadways. Additionally, project lighting would be required to comply with the SMMC Section 20.300.080, Light and Glare Standards, to minimize use of flood lighting and implement shielding techniques to direct light downward and away from other properties. Therefore, although the project would introduce new sources of light, since the sources are of similar nature to the surrounding land uses and the project would adhere to the applicable regulations, the project would not create a new source of substantial light which would adversely affect views in the area. Light impacts would be less than significant.

Glare impacts can occur because of artificial light or sunlight reflecting off a surface. Glare can create discomfort or present safety concerns (i.e., if glare is directed into the eyes of motorists). The proposed project would be constructed primarily of metal, including steel, for the gas station columns and canopy, and the concrete island and acrylic signs would be painted black, blue, and red. The structure is a canopy and therefore the only vertical elements would be the steel columns with a CMU wrap; these small areas of metal would not result in a substantial new source of glare that would adversely affect daytime or nighttime views in the area. Glare impacts would be less than significant.

II. Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non- forest use?	☐	☐	☐	☒

a) Would the project 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. Agricultural land is rated according to soil quality and irrigation status. The best quality land is called Prime Farmland, which has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Unique Farmland is land, other than Prime Farmland, which has combined conditions to produce sustained high quality and high yields of specialty crops. Farmland of Statewide Importance may include tracts of land that have been designated for agriculture by State law. In some areas that are not identified as having national or statewide importance, land is considered to be Farmland of Local Importance. As the responsible state agency for overseeing farmland classification, the California Department of Conservation (DOC) operates the Farmland Mapping and Monitoring Program to report changes in the use of agricultural lands every two years.

According to the DOC's California Important Farmland Finder (DOC 2022), the project site is classified as Urban and Built-up Land, which is land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Urban and Built-up Land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes and does not contain any Prime Farmland, Unique

Farmland, or Farmland of Statewide Importance. Farmland is not present on the site or in the general vicinity of the site. As a result, the project would not result in the conversion of such lands to non-agricultural use. No impact would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use; in return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Williamson Act is only applicable to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland, or at least 40 acres of land not designated as Prime Farmland. The Williamson Act is designed to prevent the premature and unnecessary conversion of open space lands and agricultural areas to urban uses.

As stated in Item II(a), the project site is located in an area classified by the DOC as Urban and Built-up Land where neither farmland nor agricultural resources are present. The proposed project is consistent with the project site's zoning of Commercial. Additionally, the project site is not encumbered by a Williamson Act contract and would not affect any properties zoned for agricultural use or affected by a Williamson Act contract, as there are none within the project vicinity. No impact would occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. Public Resources Code Section 12220(g) defines "forest land" as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Based on this definition, no forest land occurs within or adjacent to the project site. Moreover, there is no land zoned as forest land or timberland that exists within the project site or vicinity. There is open space adjacent to the site to the west, which contains bushes and scattered trees; however, there is no concentration of trees within the site that would constitute a forest. The project would not conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As stated in Item II(c), there is no forest land present on the site or in the project vicinity. The site has not been historically used and is not currently used or planned to be used for forest land. As such, implementation of the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e) Would the project 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. As stated in Items II(a) through (d), above, the project site is located in an area classified by the DOC as Urban and Built-up Land. Land uses surrounding the project site include commercial to the south; commercial and industrial to the east and northeast (across South Bent Avenue); commercial to the north (across SR 78); and open space, industrial, commercial, and mixed-use to the west. The surrounding area is also classified as Urban and Built-Up Land. Additionally, there is no concentration of trees that would constitute a forest on the project site. The project site does not contain agriculture or forest uses under existing conditions. Therefore, implementation of the project would not result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

III. Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The discussion below is based on the Air Quality, Greenhouse Gas Emissions, and Energy Technical Report prepared for the project ([HELIX] 2025). This report is included as Appendix A of this document.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The project site is located within the San Diego Air Basin (SDAB) where air quality is regulated by the U.S. Environmental Protection Agency (USEPA) at the federal level, by the California Air Resources Board (CARB) at the state level, and by the SDAPCD at the regional level. The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing plans for attainment and maintenance of the ambient air quality standards in the SDAB. The SDAB is a federal non-attainment area for ozone (8-hour standard) and a state non-attainment area for ozone (1-hour and 8-hour), particulate matter 10 microns or less in diameter (PM₁₀), and particulate matter 2.5 microns or less in diameter (PM_{2.5}).

The applicable air quality plans for the project are the 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan; SDAPCD 2020) and Regional Air Quality Strategy (RAQS; SDAPCD 2023). The Attainment Plan includes the SDAPCD's plans and control measures for attaining the federal ozone standard. The RAQS outlines SDAPCD's plans and control measures designed to attain the state standards for ozone. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the USEPA and CARB, and the emissions and reduction strategies related to mobile sources are considered in the RAQS, Attainment Plan, and State Implementation Plan (SIP).

The RAQS and Attainment Plan rely on information from CARB and SANDAG, including projected growth in the County (including the City), mobile, area, and all other source emissions to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by individual cities and by the County. As such, projects that propose development that is consistent with the growth anticipated by the applicable general plan would be consistent with the RAQS and Attainment Plan. If a project proposes development that is less dense than anticipated within the General Plan, the project would likewise be consistent with the RAQS and Attainment Plan. If a project proposes development that is greater than that anticipated in the applicable general plan and SANDAG's growth projections upon which the Attainment Plan is based, the project may conflict with the RAQS, Attainment Plan, and SIP and may have a potentially significant impact on air quality.

The current General Plan land use designation and zoning for the project site is Commercial. The project would be consistent with the current commercial land use and zoning designations for the project site and would not require a general plan amendment or rezone. Therefore, the project's contribution to population growth in the City would be consistent with the growth projections in the City's General Plan and the growth projections used to develop the SDAPCD's RAQS and Attainment Plan.

In addition, and as discussed further under Item III(b), below, quantitative screening thresholds are established by SDAPCD to assist in determining whether a project may have a significant air quality impact. A project with emissions lower than the thresholds would not conflict with or obstruct implementation of the plans for attainment of the applicable federal and State air quality standards. The project would not exceed the temporary construction-related or long-term operational-related thresholds of significance for criteria pollutants and precursor emissions.

Because implementation of the project would not result in criteria pollutant emissions in excess of applicable thresholds and the project would be consistent with regional growth projections, the project would not conflict with or obstruct implementation of the SDAPCD's RAQS and Attainment Plan. Impacts related to air quality plans would be less than significant.

b) Would the project 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?

Less Than Significant Impact. Air pollution is largely a cumulative impact, and the non-attainment status of regional pollutants is a result of past and present development within the region. As described under Item III(a), above, the SDAB is a federal non-attainment area for ozone (8-hour standard) and a state

non-attainment area for ozone (1-hour and 8-hour), PM₁₀, and PM_{2.5}. Ozone is a secondary pollutant formed through the reaction of the precursor pollutants volatile organic compounds (VOC) and nitrogen oxides (NO_x); therefore, direct emissions of VOC and NO_x are quantified in this analysis to assess potential effects related to attainment of the ozone standards.

To determine whether a project would result in cumulatively considerable emissions that would violate an air quality standard or contribute substantially to an existing or projected air quality violation, a project's emissions are evaluated in comparison with quantitative emission thresholds. While the SDAPCD has not adopted significance criteria for evaluation of emissions from typical land use development projects, air quality impact analysis trigger levels for new or modified stationary sources are established in SDAPCD Rules 20.2 and 20.3 and may be used as screening thresholds to evaluate the increased emissions which would be discharged to the SDAB from proposed land use development projects. In the absence of a VOC threshold established in these rules, this analysis considers the South Coast Air Quality Management District (SCAQMD) screening level threshold for VOC emissions.

The project would generate criteria pollutants and precursors in the short-term during construction and the long-term during operation. Project emissions were estimated using the California Emissions Estimator Model (CalEEMod). The emissions calculations assume the application of water on exposed surfaces a minimum of two times per day in compliance with SDAPCD Rule 55 and application of low-VOC coatings in compliance with SDAPCD Rule 67.0.1. Further details regarding the modeling assumptions and the complete CalEEMod output files are included in Appendix A.

Construction Activities

The results of the emissions calculations for maximum daily emissions during construction of the project are compared to the applicable screening level thresholds in Table 2, *Maximum Daily Construction Emissions*.

Table 2
MAXIMUM DAILY CONSTRUCTION EMISSIONS

Activities	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition/Site Preparation	1.8	20.7	18.3	<0.1	7.4	1.8
Grading	1.0	12.8	13.4	<0.1	1.6	0.7
Underground Utilities and Tanks	1.0	7.4	11.4	<0.1	0.4	0.3
Gas Station Construction	0.3	4.0	5.1	<0.1	0.3	0.1
Paving	1.2	12.5	10.6	<0.1	1.8	0.7
Architectural Coatings	1.6	0.9	1.5	<0.1	<0.1	<0.1
Maximum Daily Emissions	1.8	20.7	18.3	<0.1	7.4	1.8
<i>Screening Threshold</i>	<i>75</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
<i>Exceed Screening Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: HELIX 2025

VOC = volatile organic compounds; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides;

PM₁₀ = particulate matter 10 microns or less in diameter; PM_{2.5} = particulate matter 2.5 microns or less in diameter

As shown in Table 2, the project's short-term, construction-related emissions are not anticipated to exceed the screening level thresholds for emissions of any criteria pollutant or precursor. Accordingly, construction activities associated with development of the project would not substantially contribute to

the SDAB's non-attainment status for ozone, PM₁₀, or PM_{2.5}. Therefore, construction of the project would not violate an air quality standard or contribute to an existing or projected air quality violation.

Operational Activities

The project operational emissions were estimated using CalEEMod, and the results are shown in Table 3, *Maximum Daily Operational Emissions*, below. Per the project-specific vehicle miles traveled (VMT) analysis, the project would result in a reduction in customer-related VMT and an increase in employee-related VMT, with a total net reduction in regional VMT of 1,449 miles per day (approximately 528,885 miles per year) (Appendix H). There would also be an increase in delivery truck-related VMT, with a total net increase of 270 miles per day (98,550 miles per year). The mobile source emissions calculations account for reductions in regional mobile source emissions resulting from the project's regional reduction in VMT from customer trips and an increase in regional VMT from employee trips and fuel delivery truck trips.

Table 3
MAXIMUM DAILY OPERATIONAL EMISSIONS

Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Off-Site Mobile	-0.1	0.9	-2.4	<0.1	<0.1	<0.1
On-Site Vehicle Idling	1.9	0.7	4.2	<0.1	<0.1	<0.1
Area	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Gas Station Gasoline Vapor	44.4	-	-	-	-	-
Project Maximum Daily Emissions^{1, 2}	46.3	1.6	1.8	<0.1	<0.1	<0.1
<i>Screening Threshold</i>	<i>55</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
Exceed Screening Threshold?	No	No	No	No	No	No

Source: HELIX 2025

¹ Total may not sum due to rounding.

² Maximum daily emissions of VOC, CO, SO_x, PM₁₀, and PM_{2.5} would occur during summer, maximum daily emission of NO_x would occur during winter.

VOC = volatile organic compounds; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides;

PM₁₀ = particulate matter 10 microns or less in diameter; PM_{2.5} = particulate matter 2.5 microns or less in diameter

As shown in Table 3, the project's operational emissions of criteria pollutants and precursors would be below the applicable screening thresholds. The reduction in VOC and CO emissions from off-site mobile sources is due to the reduction in regional VMT for customers and employees, which are primarily trips by gasoline-powered vehicles. As described in Section XVII, *Transportation*, the change in regional VMT is associated with existing Costco members and employees shifting their gas trips from other Costco facilities to the new facility. The increase in NO_x emissions from off-site mobile sources is due to the increase in regional VMT from fuel delivery truck trips, which are primarily diesel-powered and have higher NO_x emissions than gasoline-powered vehicles. Accordingly, the project's operational emissions would not substantially contribute to the SDAB non-attainment status for ozone, PM₁₀, or PM_{2.5}. Long-term operation of the project would not violate an air quality standard or contribute to an existing or projected air quality violation.

As shown in Tables 2 and 3 above, the project's construction and operational emissions of criteria pollutants and precursors would not exceed the screening level thresholds of significance. Therefore, the project's construction and operational emissions would not contribute to the SDAB non-attainment status of ozone, PM₁₀, and PM_{2.5}. Thus, the project would not result in a cumulatively considerable net

increase of pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals, known as sensitive receptors, as the most likely to be affected by air pollution: adults over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005; OEHHA 2015). Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors locations. Examples of these sensitive receptor locations are residences, schools, hospitals, and daycare centers.

The closest existing sensitive receptor locations to the proposed fueling station include three daycare centers located approximately 0.16 mile from the project site and residences that are located approximately 0.24 mile away. The closest school to the project site is the Montessori School of San Marcos located approximately 0.55 mile northeast of the project site. The closest hospital to the project site is the Kaiser Permanente San Marcos Medical Center located approximately 0.83 mile southeast of the proposed fueling station. Potential future sensitive receptor locations near the project site include two proposed mixed-use developments, the closest of which would be located approximately 0.16 mile from the proposed fueling station. See Figure 6, *Modeled Receptor Locations*.

Construction Activities

During construction, the project would generate fugitive dust and diesel particulate matter (DPM) emissions. As described in Table 2 above, the project would not result in PM₁₀ or PM_{2.5} emissions in excess of the screening thresholds during construction. Additionally, as fugitive dust control measures would be implemented during construction in compliance with SDAPCD Rule 55, sensitive receptors would not be exposed to substantial concentrations of particulate matter.

Diesel engines emit a complex mixture of air pollutants referred to as DPM, which is classified as a toxic air contaminant (TAC). The use of heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles could generate the TAC DPM. Generation of DPM from construction projects typically occurs in a localized area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive phases, such as grading, construction-related emissions would be higher than other less equipment-intensive phases, such as building construction.

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has to the substance; a longer exposure period to a fixed quantity of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from the OEHHA) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are



based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). Considering the short duration (four months) of construction activity, the highly dispersive nature of DPM, and that construction activities would occur at various locations throughout the project site, construction of the project would not expose off-site sensitive receptors to substantial DPM concentrations. Impacts to sensitive receptors during construction would be less than significant.

Operational Activities

Carbon Monoxide (CO) Hotspots

Vehicle exhaust is the primary source of CO in California. In an urban setting, the highest CO concentrations are generally found near congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as distance from the emissions source (i.e., congested intersection) increases. Project-generated traffic has the potential of contributing to localized “hot spots” of CO off-site. Because CO is a byproduct of incomplete combustion, exhaust emissions are worse when fossil-fueled vehicles are operated inefficiently, such as in stop-and-go traffic or through heavily congested intersections. However, the volume of traffic required for CO concentrations to exceed the NAAQS and CAAQS is very high. The SDAPCD does not provide any screening guidance for analysis of CO hotspot impacts. The Bay Area Air Quality Management District (BAAQMD) provides screening guidance in their CEQA Guidelines concerning the volume of traffic which could result in a CO hotspot: intersections which carry more than 44,000 vehicles per hour; or intersections which carry more than 24,000 vehicles per hour and where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway) (BAAQMD 2023).

A project-specific Local Transportation Analysis (LTA) was prepared for the project and includes an analysis of traffic volumes for project-affected intersections (Appendix G). The highest volume analyzed intersection would be the intersection of West San Marcos Boulevard and the SR 78 eastbound ramps, which carries an existing volume of 4,435 vehicles during the afternoon peak hour (Appendix G). This traffic volume is substantially below the 44,000 vehicles per hour screening level for CO hotspots suggested by the BAAQMD. Furthermore, idling vehicles within the fuel facility also would not create CO hotspots as the unadjusted maximum peak-hour trips generated by the project would be 941 during the Saturday mid-day peak (Appendix G), which is also well below the 44,000 vehicles per hour CO hotspots screening level. Therefore, long-term operation of the project would not expose sensitive receptors to substantial localized concentrations of CO. Impacts would be less than significant.

Toxic Air Contaminants (Gasoline Vapor)

Implementation of the project would result in emissions of TAC in gasoline vapor from operation of a retail gasoline dispensing facility (gas station), emissions from the vehicles operating the gas station queue and pump area, and emissions from fuel delivery truck operating on the project site. To evaluate potential impacts to sensitive receptors from the project’s gas station emissions, a health risk assessment was completed as part of the air quality analysis (Appendix A).

The incremental excess cancer risk is an estimate of the chance a person exposed to a specific source of a TAC may have of developing cancer from that exposure beyond the individual’s risk of developing cancer from existing background levels of TACs in the ambient air. For context, the average cancer risk

from TACs in the ambient air for an individual living in an urban area of California is 830 in 1 million (CARB 2015). Cancer risk estimates do not mean, and should not be interpreted to mean, that a person will develop cancer from estimated exposures to toxic air pollutants.

The City has not adopted thresholds to determine the significance of exposure of sensitive receptors to TACs generated by a development project. Therefore, this analysis relies on the threshold adopted by the County. Impacts to sensitive receptors would be significant if the incremental increased cancer risk to sensitive receptors resulting from exposure to project generated TACs exceeds 10 chances per million (County 2007). Health risks associated with non-cancer chronic health risks effects and acute health risks from TAC exposure are quantified using the maximum hazard index (HI). HI is the potential exposure to a substance divided by the Reference Exposure Limit (the level at which no adverse effects are expected). An HI of less than one indicates no adverse health effects are expected from the potential exposure to the substance. Impacts to sensitive receptors would be significant if the HI for sensitive receptor non-cancer chronic risk or acute risk resulting from exposure to project generated TACs exceeds 1.0 (County 2007).

The maximum estimated community incremental health effects due to exposure to the project's TAC emissions from long term operation of the (project for the Maximally Exposed Individual Resident (MEIR; modeled receptor ER1) are presented in Table 4, *Maximum Residential Incremental Health Effects*. These estimates are conservative and assume that the resident is outdoors for the entire exposure period. The MEIR risks reported are for existing residential receptors in the project vicinity. Calculated health risks for potential future residential receptors are included in the discrete receptor health risks, below.

Table 4
MAXIMUM RESIDENTIAL INCREMENTAL HEALTH EFFECTS

	MEIR Cancer Risk (chances per million)	MEIR Non-Cancer Chronic Hazard Index	MEIR Acute Hazard Index
Results	0.51	0.002	0.046
Threshold	10	1	1
<i>Exceed Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: HELIX 2025

MEIR = Maximally Exposed Individual Resident

The maximum estimated community incremental health effects due to exposure to the project's TAC emissions from long term operation of the project for the Maximally Exposed Individual Worker (MEIW) would be modeled receptor C4 for cancer and non-cancer chronic risks (a point outside of the permanent building for the business across South Bent Avenue from the project site). For off-site worker short-term acute risks, workers were assumed to be anywhere with the commercial/industrial properties surrounding the project site and the MEIW-Acute would be at approximately 150 feet northwest of the MEIW for cancer and non-cancer chronic risks (modeled receptor C4), near the sidewalk across South Bent Avenue from the project site. Health risks for the MEIW are presented in Table 5, *Maximum Worker Incremental Health Effects*. These estimates are conservative and assume that the worker is outdoors for the entire exposure period.

Table 5
MAXIMUM WORKER INCREMENTAL HEALTH EFFECTS

	MEIW Cancer Risk (chances per million)	MEIW Non-Cancer Chronic Hazard Index	MEIW Acute Hazard Index
Results	3.42	0.057	0.45
Threshold	10	1	1
<i>Exceed Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: HELIX 2025

MEIW = Maximally Exposed Individual Worker

The estimated incremental excess cancer risk, chronic hazard index, and acute hazard index due to exposure to the project's TAC emissions for each discrete receptor location are presented in Table 6, *Discrete Receptor Incremental Cancer, Chronic, and Acute Health Effects*.

Table 6
DISCRETE RECEPTOR INCREMENTAL CANCER, CHRONIC, AND ACUTE HEALTH EFFECTS

Receptor ID	Description	Cancer Risk (chances per million)	Non-Cancer Chronic Hazard Index	Acute Hazard Index
ER1	Existing Single-Family Residential	0.51	0.002	0.046
ER2	Existing Multi-Family Residential	0.31	0.001	0.027
ER3	Existing Multi-Family Residential	0.36	0.001	0.032
FR1	Future Mixed-Use Residential	0.73	0.003	0.043
FR2	Future Mixed-Use Residential	0.67	0.002	0.043
FR3	Future Mixed-Use Residential	1.12	0.003	0.102
FR4	Future Mixed-Use Residential	1.32	0.005	0.092
D1	Daycare Facility	2.23	0.006	0.038
D2	Daycare Facility	0.95	0.003	0.055
D3	Daycare Facility	0.41	0.001	0.038
C1	Off-Site Commercial Building	0.14	0.003	0.067
C2	Off-Site Commercial Building	0.20	0.004	0.092
C3	Off-Site Commercial Building	0.36	0.008	0.159
C4	Off-Site Commercial Building	3.42	0.057	0.186
C5	Off-Site Commercial Building	0.78	0.016	0.045
C6	Off-Site Commercial Building	0.58	0.013	0.110
C7	Off-Site Commercial Building	0.51	0.011	0.076
C8	Off-Site Commercial Building	0.41	0.009	0.074
C9	Off-Site Commercial Building	0.38	0.009	0.128
C10	Off-Site Commercial Building	0.27	0.006	0.064
C11	Off-Site Commercial Building	0.56	0.011	0.148
C12	Off-Site Commercial Building	0.55	0.011	0.146
C13	Off-Site Commercial Building	0.37	0.008	0.077
C14	Off-Site Commercial Building	0.94	0.021	0.220

Source: HELIX 2025

The point of maximum off-site impact for residential cancer and non-cancer chronic health risks would be on the project development area's south boundary on the edge of South Bent Avenue, near the proposed gas pump canopy location. No residents or off-site workers are anticipated to be at the point of maximum impact for prolonged periods. If residents were to be located at the point of maximum

impact for 30 years, the estimated incremental excess cancer risk would be 176 in 1 million. The point of maximum impact, MEIR, and MEIW locations are shown in Figure 6.

As shown in Tables 4, 5, and 6, the incremental increased cancer risks would not exceed the County threshold of 10 in 1 million, and the chronic and acute HI would not exceed the County threshold of 1. Therefore, community health effects due to exposure to TAC emissions from long-term operation of the proposed project would not exceed the County thresholds at the maximum proposed permitted throughput of 36.5 million gallons per year of gasoline, and long-term operation of the proposed gas station would not expose of sensitive receptors to substantial TAC concentrations. Impacts would be less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations (SCAQMD 1993). The project consists of a gas station that would not include any of the typical sources of odors identified by the SCAQMD. Emissions of gasoline vapor (which has an odor) are regulated and controlled by SCAQMD and CARB using the Phase I and Phase II enhanced vapor recovery (EVR) systems. Phase I EVR, in accordance with California Executive Order VR-102, requires more durable and leak-tight components, along with an increased collection efficiency of 98 percent. Phase II EVR, in accordance with California Executive Order VR-204, includes three major advancements: (1) dispensing nozzles with less spillage and required compatibility with onboard refueling vapor recovery vehicles, (2) a processor to control the static pressure of the ullage, or vapor space, in the underground storage tank, and (3) an in-station diagnostic system that provides warning alarms to alert a gas station operator of potential vapor recovery system malfunctions. The project would be required to implement Phase I EVR and Phase II EVR systems meeting the latest CARB performance standards. Project construction could result in minor amounts of odors associated with unburned hydrocarbons in diesel heavy equipment exhaust. The odor of these diesel exhausts is objectionable to some; however, emissions would be intermittent and would disperse rapidly, and, therefore, not affect a substantial number of people. As such, the project would not result in emissions leading to odors adversely affecting a substantial number of people. Impacts would be less than significant.

IV. Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 US Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a) *Would the project 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS)?*

Less Than Significant Impact. The project involves the redevelopment of a paved parking lot and limited ornamentally landscaped medians with a gas station. The project site is almost entirely developed with no native vegetation that could provide habitat for special-status species. No direct impacts to a sensitive species would occur. The project site is adjacent to open space to the west that contains native vegetation and is known to contain vernal pools that could potentially support sensitive species. The project would obtain a NPDES permit, which requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The purpose of a SWPPP is to identify best management practices (BMPs) to control erosion, siltation, and contaminated runoff from construction sites. Indirect project impacts to sensitive species during construction would be avoided by implementation of these standard BMPs. Post-construction, the open space area would not be affected by project operations. The existing fence at the property line would remain to prevent access and project runoff would be directed to proposed on-site drainage facilities that would collect and convey on-site runoff into the existing municipal storm drain system.

The project would result in the addition of trees to the project site and would not remove any protected trees or habitat suitable to special-status species. Because of the highly disturbed nature of the project site and the nearly continuous amount of daytime vehicular and commercial activity around the site, it is

unlikely that the existing trees would provide desirable nesting opportunities for bird and raptor species, especially considering that more suitable nesting options occur in the adjacent open space to the west. Therefore, the project would not result in a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special-status species. Impacts would be less than significant.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified 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 Impact. The project site is almost entirely developed and contains some ornamental vegetation in landscaped areas but does not contain riparian habitat or other sensitive natural communities. As such, no direct impacts to sensitive natural communities would occur. The project site is adjacent to an open space to the west that contains sensitive habitat, but as discussed in Item IV(a), indirect impacts would be avoided through drainage controls and fencing. Impacts would be less than significant.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact. The project site does not contain state or federally protected wetlands and no direct impacts would occur. The project site is adjacent to open space that is known to contain vernal pools. However, as stated above, indirect impacts would be avoided through drainage controls and fencing. Impacts would be less than significant.

d) Would the project 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 corridors connect otherwise isolated pieces of habitat and allow movement or dispersal of plants and animals. The project site is almost entirely developed and is surrounded by existing development to the north, east, and south, and as such, does not by itself function as or contribute to any wildlife corridors or linkages, or native wildlife nursery sites. No native wildlife nurseries are present in the project vicinity. Furthermore, the project site or immediate area are not identified as a wildlife corridor in the City's General Plan. The project site is adjacent to North County Multiple Habitat Conservation Program (MHCP) preserve lands to the west, but a wrought iron fence currently restricts access to and from the preserve, and no point of access is proposed by the project. This open space area is situated between developed areas and has limited functions as a wildlife movement corridor due to the small size, lack of nearby open space areas, and the presence of surrounding development. Therefore, the project would not substantially interfere with the movement of native or resident migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of a native wildlife nursery site. No impact would occur.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. General Plan Conservation and Open Space Element Policy COS-2.6 calls to preserve healthy mature trees where feasible and where removal of trees is necessary, they are to be replaced at a 1:1 ratio. The project site consists of developed land with some ornamental vegetation in landscaped areas,

including trees. A total of 23 existing trees would be removed and 17 existing trees would be protected on-site. The project landscape plan proposes more vegetation and trees than currently exist on-site; specifically, 28 trees would be planted to offset the 23 trees that would be removed, which exceeds to the 1:1 replacement ratio. Other applicable local policies include Conservation and Open Space Element Policy COS-1.2 to ensure that new development, including Capital Improvement Projects, maintain the biotic habitat value of riparian areas, oak woodlands, habitat linkages, and other sensitive biological habitats. As discussed above, the project would not directly or indirectly impact the adjacent open space area that contains sensitive biological habitat. As such, the project would not conflict with any local policies or ordinances protecting biological resources. No impact would occur.

f) *Would the project 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. CDFW’s Natural Community Conservation Planning (NCCP) Program began in 1991 as a cooperative effort to protect habitats and species, and local jurisdictions are responsible for developing their own NCCPs (CDFW 2024). The City is one of seven incorporated cities working through SANDAG that make up the North County MHCP, which is an NCCP. Each city in the geographic scope of the MHCP must draft and adopt its own MHCP subarea plan in order for incidental take permits to be issued. The City has drafted but not adopted the San Marcos Natural Community Conservation Plan (SMNCCP). The MHCP is advisory in nature only, as the SMNCCP would be the implementing document for the City under the MHCP. Implementation of the project would not preclude or prevent finalizing and adoption of the SMNCCP. However, as the SMNCCP has not been adopted, the project would not conflict with adopted Habitat Conservation Plans or Natural Community Conservation Plans. Therefore, no impact would occur.

V. Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

The discussion below is based on the Archaeological Survey Report (HELIX 2024) prepared for the project. This report is included as Appendix B of this document.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. Significant historical resources under CEQA are those that are listed on or eligible for listing on the California Register of Historical Resources (CRHR), National Register of Historic Places (NRHP), or a local historic register. These can include any object, building, structure, site, area, place, record, or manuscript which is historically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (Public resources Code Section 5020.1[j]). The project development area is developed with surface parking and associated landscaping and does not contain any buildings or structures.

A records search was conducted at the South Coastal Information Center in September 2023. The records search covered a one-mile radius around the project area and included the identification of previously recorded cultural resources and locations and citations for previous cultural resources studies. A review of the California Historical Resources and the state Office of Historic Preservation historic properties directories and Local Register was also conducted. Various additional archival sources were also consulted, including historic topographic maps and aerial imagery. The purpose of this research was to identify historic structures and land use in the area.

Twelve historic sites have been documented within one mile of the project site, none of which occur within the project site. Previously recorded historic resources include the burned remains of a residence with associated historic refuse; three historic refuse scatters; a concrete pad with floor tiles and an associated chimney-like structure; a two-story Vernacular Victorian farmhouse located at 918 Discovery Street constructed in 1900 and found to be CRHR eligible (P-37-030252); two sites documented as foundations for chicken coops, one of which had an associated drain (P-37-030379 and P-37-030380); a portion of the NRHP-eligible historic Highway 395; a Mid-Century Modern commercial building at 304 West Mission Road dating to 1954; a Mid-Century Modern commercial building at 312-318 West Mission Road dating to 1955-1956 (the Buelow Building); and the remains of a historic structure including a foundation with associated driveway, brick wall, and a set of stairs (P-37-036501).

Based on the results of the records search and lack of on-site buildings and structures, no historic properties or historical resources would be affected by implementation of the proposed project. Therefore, the project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. No impact would occur.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact with Mitigation Incorporated. The records search conducted for the project identified 56 previously recorded cultural resources within a half-mile of the project site, but none within the project site. In general, the sites recorded within the one-mile search radius consist of prehistoric resources comprising habitation and village sites, bedrock milling, artifact and lithic scatters, a rock shelter site, and isolated artifacts. Three multi-component sites are recorded as a habitation site with historic artifacts; a bedrock milling site with lithics, faunal bone, and historic refuse; and a lithic and artifact scatter with bedrock milling and historic refuse. No archaeological resources were observed during a field survey of the site that was conducted in December 2023; however, the project site was covered by pavement and landscaping, and because of this, much of the original ground surface could not be observed.

Additionally, a Sacred Lands File (SLF) search was conducted that involved contacting the Native American Heritage Commission (NAHC) in September 2023 for a list of Native American contacts for the project area. The results of the SLF search were positive and as discussed in Section XVIII, *Tribal Cultural Resources*, Native American tribes have identified the project site is located in an area with high cultural sensitivity where cultural resources are known to be present. While no archaeological resources were identified on the project site, this area of the City is highly sensitive for cultural resources based on the numerous sites that have been recorded in the project area and documented in the region. Additionally, the project site is located in an area characterized by alluvial soils, which have the potential to contain cultural resources. Therefore, there is potential for unknown subsurface archaeological resources to be encountered during construction-related ground disturbance and impacts to such resources could be potentially significant. Mitigation Measures CUL-1 through CUL-4 provide for monitoring and discovery protocols that would reduce these potential impacts. With implementation of mitigation measures CUL-1 through CUL-4, impacts would be less than significant.

Mitigation Measures

CUL-1 Pre-Excavation Agreement. Prior to the issuance of a Grading Permit, or ground-disturbing activities, the Applicant/Owner shall enter into a Tribal Cultural Resources Treatment and Repatriation Agreement (Pre-Excavation Agreement) with a Traditionally and Culturally Affiliated Native American Tribe (TCA Tribe), identified in consultation with the City. The purpose of the Pre-Excavation Agreement shall be to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection, treatment, and repatriation of Native American human remains, funerary objects, cultural and/or religious landscapes, ceremonial items, traditional gathering areas, and other tribal cultural resources. Such resources may be located within and/or discovered during ground-disturbing and/or construction activities for the proposed project, including any additional culturally appropriate archaeological studies, excavations, geotechnical investigations, grading, preparation for wet and dry infrastructure, and other ground-disturbing activities. Any project-specific Monitoring Plans and/or excavation plans prepared by the project archaeologist shall include the TCA Tribe requirements for protocols and protection of tribal cultural resources that were agreed to during the tribal consultation.

The landowner shall relinquish ownership of all non-burial related tribal cultural resources collected during construction monitoring and from any previous archaeological studies or excavations on the project site to the TCA Tribe for proper treatment and disposition per the Pre-Excavation Agreement, unless ordered to do otherwise by responsible agency or court of competent jurisdiction. The requirement and timing of such release of ownership, and the recipient thereof, shall be reflected in the Pre-Excavation Agreement. If the TCA Tribe does not accept the return of the cultural resources, then the cultural resources will be subject to curation.

CUL-2 Construction Monitoring. Prior to the issuance of a Grading Permit or ground-disturbing activities, the Applicant/Owner or Grading Contractor shall provide written documentation (either as signed letters, contracts, or emails) to the City's Planning Division stating that a Qualified Archaeologist and Traditionally and Culturally Affiliated Native American monitor (TCA Native American monitor) have been retained at the

Applicant/Owner or Grading Contractor's expense to implement the construction monitoring program, as described in the Pre-Excavation Agreement.

The Qualified Archaeologist and TCA Native American monitor shall be invited to attend all applicable pre-construction meetings with the General Contractor and/or associated subcontractors to present the construction monitoring program. The Qualified Archaeologist and TCA Native American monitor shall be present on-site during grubbing, grading, trenching, and/or other ground-disturbing activities that occur in areas of native soil or other permeable natural surfaces that have the potential to unearth any evidence of potential archaeological resources or tribal cultural resources. In areas of artificial paving, the Qualified Archaeologist and TCA Native American monitor shall be present on-site during grubbing, grading, trenching, and/or other ground-disturbing activities that have the potential to disturb more than six inches below the original pre-project ground surface to identify any evidence of potential archaeological or tribal cultural resources. No monitoring of fill material, existing or imported, will be required if the General Contractor or developer can provide documentation to the satisfaction of the City that all fill materials being utilized at the site are either: 1) from existing commercial (previously permitted) sources of materials; or 2) are from private or other non-commercial sources that have been determined to be absent of tribal cultural resources by the Qualified Archaeologist and TCA Native American monitor.

The Qualified Archaeologist and TCA Native American monitor shall maintain ongoing collaborative coordination with one another during all ground-disturbing activities. The requirement for the construction monitoring program shall be noted on all applicable construction documents, including demolition plans, grading plans, etc. The Applicant/Owner or Grading Contractor shall provide written notice to the Planning Division and the TCA Tribe, preferably through e-mail, of the start and end of all ground-disturbing activities.

Prior to the release of any grading bonds, or prior to the issuance of any project Certificate of Occupancy, an archaeological monitoring report, which describes the results, analysis, and conclusions of the construction monitoring shall be submitted by the Qualified Archaeologist, along with any TCA Native American monitor's notes and comments received by the Qualified Archaeologist, to the Planning Division Manager for approval. Once approved, a final copy of the archaeological monitoring report shall be retained in a confidential City project file and may be released, as a formal condition of AB 52 consultation, to the Pechanga Band of Indians, San Luis Rey Band of Mission Indians and Rincon Band of Luiseño Indians, or any parties involved in the project-specific monitoring or consultation process. A final copy of the report, with all confidential site records and appendices, will also be submitted to the South Coastal Information Center after approval by the City.

CUL-3

Unanticipated Discovery Procedures. Both the Qualified Archaeologist and the TCA Native American monitor may temporarily halt or divert ground-disturbing activities if potential archaeological resources or tribal cultural resources are discovered during construction activities. Ground-disturbing activities shall be temporarily directed away from the area of discovery for a reasonable amount of time to allow a determination of

the resource's potential significance. Isolates and clearly non-significant archaeological resources (as determined by the Qualified Archaeologist, in consultation with the TCA Native American monitor) will be minimally documented in the field. All unearthed archaeological resources or tribal cultural resources will be collected, temporarily stored in a secure location (or as otherwise agreed upon by the Qualified Archaeologist and the TCA Tribe), and repatriated according to the terms of the Pre-Excavation Agreement, unless ordered to do otherwise by responsible agency or court of competent jurisdiction.

If a determination is made that the archaeological resources or tribal cultural resources are considered potentially significant by the Qualified Archaeologist, the TCA Tribe, and the TCA Native American monitor, then the City and the TCA Tribe shall determine, in consultation with the Applicant/Owner and the Qualified Archaeologist, the culturally appropriate treatment of those resources.

If the Qualified Archaeologist, the TCA Tribe, and the TCA Native American monitor cannot agree on the significance or mitigation for such resources, these issues will be presented to the Planning Division Manager for decision. The Planning Division Manager shall make a determination based upon the provisions of CEQA and California Public Resources Code Section 21083.2(b) with respect to archaeological resources and California Public Resources Section 21704 and 21084.3 with respect to tribal cultural resources, and shall take into account the religious beliefs, cultural beliefs, customs, and practices of the TCA Tribe.

All sacred sites, significant tribal cultural resources, and/or unique archaeological resources encountered within the project area shall be avoided and preserved as the preferred mitigation. If avoidance of the resource is determined to be infeasible by the City as the Lead Agency, then the City shall require additional culturally appropriate mitigation to address the negative impact to the resource, such as, but not limited to, the funding of an ethnographic study and/or a data recovery plan, as determined by the City in consultation with the Qualified Archaeologist and the TCA Tribe. The TCA Tribe shall be notified and consulted regarding the determination and implementation of culturally appropriate mitigation and the drafting and finalization of any ethnographic study and/or data recovery plan, and/or other culturally appropriate mitigation. Any archaeological isolates or other cultural materials that cannot be avoided or preserved in place as the preferred mitigation shall be temporarily stored in a secure location on-site (or as otherwise agreed upon by the Qualified Archaeologist and TCA Tribe), and repatriated according to the terms of the Pre-Excavation Agreement, unless ordered to do otherwise by responsible agency or court of competent jurisdiction. The removal of any artifacts from the project site will be inventoried with oversight by the TCA Native American monitor.

If a data recovery plan is authorized as indicated above and the TCA Tribe does not object, then an adequate artifact sample to address research avenues previously identified for sites in the area will be collected using professional archaeological collection methods. If the Qualified Archaeologist collects such resources, the TCA Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the Qualified Archaeologist does not collect the cultural

resources that are unearthed during the ground-disturbing activities, the TCA Native American monitor may, at their discretion, collect said resources for later reburial or storage at a local curation facility, as described in the Pre-Excavation Agreement.

In the event that curation of archaeological resources or tribal cultural resources is required by a superseding regulatory agency, curation shall be conducted by an approved local facility within San Diego County and the curation shall be guided by California State Historical Resources Commission's Guidelines for the Curation of Archaeological Collections. The City shall provide the Applicant/Owner final curation language and guidance on the project grading plans prior to issuance of the grading permit, if applicable, during project construction. The Applicant/Owner shall be responsible for all repatriation and curation costs and provide to the City written documentation from the TCA Tribe or the curation facility, whichever is most applicable, that the repatriation and/or curation have been completed.

CUL-4

Human Remains. As specified by California Health and Safety Code Section 7050.5, if human remains, or remains that are potentially human, are found on the project site during ground-disturbing activities or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Medical Examiner's Office by telephone. No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains (as determined by the Qualified Archaeologist and/or the TCA Native American monitor) shall occur until the Medical Examiner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98.

If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the Qualified Archaeologist and/or the TCA Native American monitor), and consultation and treatment could occur as prescribed by law. As further defined by State law, the Medical Examiner will determine within two working days of being notified if the remains are subject to his or her authority. If the Medical Examiner recognizes the remains to be Native American, and not under his or her jurisdiction, then he or she shall contact the NAHC by telephone within 24 hours. The NAHC will make a determination as to the Most Likely Descendent (MLD), who shall be afforded 48 hours from the time access is granted to the discovery site to make recommendations regarding culturally appropriate treatment.

If suspected Native American remains are discovered, the remains shall be kept in situ (in place) until after the Medical Examiner makes its determination and notifications, and until after the MLD is identified, at which time the archaeological examination of the remains shall only occur on-site in the presence of the MLD. The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). In the event that the Applicant/Owner and the MLD are in disagreement regarding the disposition of the remains, State law will apply, and the mediation process will occur with the NAHC. In the event that mediation

is not successful, the landowner shall rebury the remains at a location free from future disturbance (see Public Resources Code Section 5097.98(e) and 5097.94(k))

c) *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

Less Than Significant with Mitigation Incorporated. The project site is not within a known cemetery or burial ground. However, in the highly unlikely event that human remains are uncovered during ground-disturbing activities, impacts to these remains would be potentially significant. There are regulatory provisions to address the handling of human remains in California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event that human remains are discovered, disturbance of the site would be halted until the County Medical Examiner has conducted an investigation and recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to their authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The County Medical Examiner is required to make a determination within 2 working days of notification of the discovery of the human remains. If the County Medical Examiner determines that the remains are not subject to their authority, and if they recognize or have reason to believe the human remains to be those of a Native American, they would be required to consult with the NAHC by telephone within 24 hours, to designate a MLD to recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. Mitigation measure CUL-4 requires compliance with these regulations and would reduce potential impacts associated with human remains.

VI. Energy

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The discussion below is based on the Air Quality, Greenhouse Gas Emissions, and Energy Technical Report prepared for the project (HELIX 2025). This report is included as Appendix A of this document.

a) *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Less Than Significant Impact. The project would result in the demand for energy resources during both construction and long-term operation, as described below.

Construction Energy Use

Project-related construction activities would consume energy, primarily in the form of diesel fuel and gasoline (for mobile construction equipment, for on-road vehicles used to transport debris, soil and supplies, and for construction worker commute trips) and electricity (for power tools and temporary construction offices). There are no known conditions within the project site that would require non-standard equipment or construction practices that would be less energy-efficient than those used at comparable construction sites in the region or the state. Construction of the project would be required to comply with applicable state regulations. Construction equipment would be required to comply with the latest USEPA and CARB engine emissions standards. Per the California Green Building Standards Code (CALGreen) regulations, the project is required to divert 65 percent of waste generated during construction from landfills. Recycling construction and demolition waste not only keeps it from being transported to the landfill but also reduces the “upstream” energy consumption from the manufacturing of virgin material. Some incidental energy conservation would also occur through compliance with California Code of Regulations (CCR) Title 13 limits on idling, which limits idling times of construction vehicles to no more than five minutes, thereby avoiding unnecessary and wasteful consumption of fuel.

As discussed above, there are no unusual characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or state. Therefore, construction energy use would not be inefficient, wasteful, or unnecessary.

Operational Energy Use

The project would require electricity for the operation of the gas station equipment and lighting. Per the CalEEMod defaults for a gas station with 18 pumps (36 fueling positions) and approximately 46,000 SF of lighted parking and driveway areas, the project would use approximately 42,880 kWh of electricity per year. In addition, per the CalEEMod defaults for the irrigation of approximately 4,590 net new landscaped area, the project would use approximately 68,594 gallons of water per year resulting in the indirect use of 364 kWh of electricity to treat and supply water. San Diego Gas & Electric customers consumed approximately 4,101 GWh (4,101,000,000 kWh) in 2023. As such, the project’s use of approximately 43,244 kWh per year would be a negligible portion of the supply and use electricity in San Diego County. Through compliance with applicable building and lighting codes, the project’s use of electricity under operations would not be a wasteful, inefficient, or unnecessary consumption of energy.

Per the project VMT analysis (Appendix H), the project would result in a net reduction in regional VMT of 1,449 miles per day (approximately 528,885 miles per year) for project customers and employees. Therefore, the project would result in a reduction in regional transportation energy use for the estimated 747,885 one-way trips per year from project customers and employees. The project could result in an increase in regional transportation fuels related to fuel delivery trucks and vehicle idling. During operation, the project is anticipated to result in a 15,302 gallons per year decrease in regional gasoline use from the net decrease in regional VMT from project customer and employee trips, a 16,290 gallons per year increase in regional diesel use from the increase in regional truck VMT from project fuel

delivery trucks, and a 901 kilowatt-hours (kWh) increase in regional electric vehicle energy use from project employee trips. Statewide consumption of diesel is approximately 3.1 billion gallons per year. The project's use of 16,290 gallons per year would be a negligible portion of the supply and use of diesel in California.

Because the project would result in a reduction in regional VMT and a reduction in transportation energy use for the estimated 747,885 one-way trips per year from project customers and employees, implementation of the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The project would comply with applicable energy standards and regulations during construction. The project would be built and operated in accordance with existing applicable regulations at the time of construction, including Title 24 Part 6 building energy efficiency requirements and Title 24 Part 11 CALGreen requirements. As discussed above in Item VI(a), the project would result in a net reduction in regional VMT and a reduction in transportation energy use. With respect to on-site renewable energy sources, because of the project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. In addition, it would not be feasible to install solar on the fueling canopy due to structural constraints.

Applicable local plans related to renewable energy and energy efficiency include the City's Climate Action Plan (CAP) and General Plan. As discussed in Item VIII(a), the project would be consistent with the City's CAP. As discussed in Item XI(b), the project would be consistent with applicable General Plan policies, including those related to energy efficiency (Conservation Open Space Element Policy COS-4.6). Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

VII. Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The discussion below is based on the Geotechnical Study prepared for the project (Kleinfelder 2024). This report is included as Appendix C of this document.

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?**

Less Than Significant Impact. Under the Alquist-Priolo Earthquake Fault Zoning Act (Act), the California State Geologist identifies areas in the State that are at risk from surface fault rupture. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act also requires the State Geologist to establish regulatory zones, known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults and to issue appropriate maps that identify these zones.

The project site is located in tectonically active Southern California. However, no Alquist-Priolo Fault Hazard Zones or other known active faults traverse the project site. The closest known active fault is the Elsinore Fault, located 17 miles to the northeast (DOC 2021). Based on the lack of active or potentially active faults underlying the project area, the potential for surface rupture is low, and the project site

would not be subject to a greater seismic risk than other locations within the region. Additionally, per Act, because the project site is not located in an Alquist-Priolo Fault Zone, the project would not place any prohibited uses (e.g., uses containing structures with a capacity of 300 people or more; uses with the potential to severely damage the environment or cause major loss of life; or specific civic uses including police and fire stations, schools, hospitals, rest homes, nursing homes, and emergency communication facilities) within an Alquist-Priolo Fault Zone. Thus, the potential for loss, injury, or death involving rupture of a known earthquake fault is considered low. Impacts would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. While there are no faults within the project site, the site could be subject to strong seismic ground shaking from regional seismic activity. As identified in Item VII(a)(i), the nearest identified potentially active fault is located approximately 17 miles northeast of the project site. Proposed structures on the site would be designed in accordance with applicable seismic parameters of the current California Building Code. Therefore, the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction of cohesionless soils can be caused by strong vibratory motion due to earthquakes. Loose granular soils and non-plastic silts that are saturated by a relatively shallow groundwater table are susceptible to liquefaction. Pursuant to SMMC Section 17.32.040, Building, Construction, and Related Activities, applications for grading permits are required to be accompanied by a geotechnical report that addresses on-site soils and geology, includes conclusions regarding the adequacy of the site to be developed as proposed, and provides recommendations specific to the project site. Consistent with City regulations, the Geotechnical Study was prepared for the project to evaluate the adequacy of the site for the proposed development and a future geotechnical report with recommendations for construction of the proposed project's final building plans would be required prior to issuance of a grading permit.

Subsurface conditions at the site generally consist of artificial fill placed during initial development of the site over older alluvial soils underlain by sedimentary deposits of the Santiago Formation, which is a very dense clayey sand. Groundwater was measured at a depth of approximately 10 feet below the existing ground surface. The potential for liquefaction at the site is considered low due to the density and soil composition of the underlying soils. Additionally, due to the developed nature of the existing site, impacts related to liquefaction are not anticipated. Although no geologic conditions were encountered that would preclude development of the project as proposed, additional standard engineering and construction practices for soil removal/excavation, grading, and seismic design recommendations would be provided by the final geotechnical investigation. Recommendations could include in-situ ground modification, removal of liquefiable layers and replacement with compacted fill, or support of project improvements with piles to sufficient depths. If construction is proposed in areas of shallow groundwater, shoring and dewatering may be needed. The project would be required to adhere to the applicable standard engineering and construction practice recommendations during grading permit issuance. With implementation of relevant geological recommendations, the project would not result in substantial risks from seismic-related ground failure, including liquefaction. Impacts would be less than significant.

iv. Landslides?

No Impact. The project site is identified in Figure 6-1 of the City’s General Plan Safety Element as having “Zero Susceptibility” to landslides (City 2012). Additionally, the Geotechnical Study concluded the potential for landslides or slope instabilities to occur is negligible. The project site is flat and is not located near slopes that could pose a landslide risk. Therefore, the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts would be less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The project site is relatively flat and almost entirely developed with paved surface parking and ornamental landscaping. During project construction, paved surfaces would be temporarily removed and replaced, resulting in the potential for erosion. The project would be required to comply with the City’s Grading Ordinance, which contains design standards and performance requirements to avoid or reduce, to an acceptable level, excessive erosion. Furthermore, the project would be required to implement geotechnical recommendations and SWPPP BMPs to prevent soil erosion and loss of topsoil from construction activities such as the use of silt fencing, fiber rolls, and sandbags.

The proposed project would not result in long-term, operational impacts associated with soil erosion or loss of topsoil. While project implementation would result in a net increase in pervious surfaces (approximately 5,800 SF) due to the addition of landscaped areas (Appendix D), the site would remain almost entirely paved and would not contain a substantial amount of exposed soil. Furthermore, the site is topographically level and proposed landscaped areas would be stabilized to minimize erosion or off-site transport of topsoil. Therefore, the project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant.

c) Would the project 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. As described above in Items VII(a)(iii) and VII(a)(iv) above, the project site would not be subject to risks associated with liquefaction and landslides. Lateral spreading occurs when an underlying soil layer liquefies, and blocks of overlying surficial soil displace downslope or towards a sloping surface or unsupported “free face” such as riverbank. The lateral displacement typically ranges from a few inches to several feet and can cause severe damage to structures. Due to the density and soil composition of underlying soils at the project site and the lack of shallow groundwater, the risk of lateral spreading impacting the project site is considered to be very low. The project would be required to comply with the recommendations outlined in the final geotechnical investigation prepared for the project and applicable recommendations identified during grading permit issuance, which would reduce the potential for adverse effects to occur due to geologic instability. For these reasons, the project site is not located on an unstable geologic unit or at risk to experience subsidence or collapse. Impacts related unstable geologic units or soils would be less than significant.

d) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Less Than Significant Impact. Expansive soils are clay-based and tend to increase in volume due to water absorption and decrease in water volume due to drying. The project site is underlain by artificial fill and dense, clayey sand, with a corresponding very low potential for on-site soil expansion. Prior development of the site has further reduced expansion potential. Regardless, the project would be required to comply with the final geotechnical recommendations identified during the grading permit issuance process, which would additionally reinforce underlying soils. Accordingly, the proposed project would not be located on expansive soil creating substantial risks to life or property. Impacts would be less than significant.

e) *Would the project 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 proposed project does not include septic tanks or alternative wastewater disposal systems, as the project does not require wastewater services. No impact would occur.

f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Less Than Significant with Mitigation Incorporated. The project site is underlain by geologic units ranging from zero paleontological sensitivity (artificial fill/aggregate base) to moderate paleontological sensitivity (old alluvial flood plain deposits and Santiago Formation). Excavation activities within the Pleistocene-age alluvial flood plain deposits and metasedimentary Santiago Peak volcanics have the potential to contain fossil remains (County of San Diego 2009). It is anticipated that these underlying formations may be encountered at the site during earthwork extending deeper than 10 feet below ground surface. Excavation for the proposed USTs would extend to depths greater than 10 feet and thus, project construction activities could potentially encounter paleontological resources, the destruction of which would result in potentially significant impacts. Implementation of a paleontological mitigation program in the form of limited paleontological monitoring, as outlined in mitigation measures GEO-1 through GEO-6 below, would reduce impacts to paleontological resources to less than significant.

Mitigation Measures

GEO-1 Personnel and Repository (pre-construction). Prior to the commencement of construction, a qualified project Paleontologist shall be retained to oversee the limited paleontological mitigation program (a project Paleontologist is a person with a Ph.D. or Master's Degree in Paleontology or related field, and who has knowledge of San Diego County paleontology and documented experience in professional paleontological procedures and techniques). In addition, an appropriate regional fossil repository shall be designated to receive any discovered fossils (e.g., the San Diego Natural History Museum).

GEO-2 Meeting (pre-construction). The project Paleontologist should attend the project preconstruction meeting to consult with the grading and excavation contractors and City environmental and engineering staff concerning excavation schedules, paleontological field techniques, and safety issues.

- GEO-3 Monitoring (during construction).** A paleontological monitor (working under the direction of the project Paleontologist) should initially be on-site on a full-time basis during any excavations extending more than 10 feet below ground surface in the eastern and southern portions of the site only, where previously undisturbed deposits of Moderate paleontological sensitivity (e.g., old alluvial flood plain deposits) may be present, in order to inspect exposures for unearthed fossils. Monitoring may be reduced or terminated at the discretion of the project Paleontologist based on the results of initial monitoring.
- GEO-4 Fossil Recovery (during construction).** If fossils are discovered, the project Paleontologist (or paleontological monitor) should recover them. In most cases, fossil salvage can be completed in a short period of time. However, some fossil specimens (e.g., a bone bed or a complete large mammal skeleton) may require an extended salvage period. In these instances, the project Paleontologist (or paleontological monitor) has the authority to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner.
- GEO-5 Treatment (post-construction).** Fossil remains collected during monitoring and salvage should be cleaned, repaired, sorted, and cataloged as part of the mitigation program.
- GEO-6 Curation (post-construction).** Prepared fossils, along with copies of all pertinent field notes, photos, and maps, should be deposited (as a donation) in the designated fossil repository. Donation of the fossils shall be accompanied by financial support for initial specimen storage.

VIII. Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The discussion below is based on the Air Quality, Greenhouse Gas Emissions, and Energy Technical Report prepared for the project (HELIX 2025). This report is included as Appendix A of this document.

a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less Than Significant Impact. Global temperatures are moderated by atmospheric gases. These gases are commonly referred to as greenhouse gases (GHGs) because they function like a greenhouse by

letting sunlight in but preventing heat from escaping, thus warming the Earth's atmosphere. GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition. Global climate change is primarily considered a cumulative impact but must also be evaluated on a project level under CEQA.

A project participates in this cumulative impact through its incremental contribution combined with the cumulative increase of all other sources of GHG emissions. Principal GHGs regulated under state and federal law and regulations include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). GHG emissions are measured in metric tons (MT) of CO₂ equivalent (CO₂e), which account for weighted global warming potential factors.

The City adopted the Final Climate Action Plan (CAP) on December 8, 2020. The CAP relies on a screening threshold of 500 MT CO₂e per year based on land use size and a CAP Consistency Checklist to determine whether a project's emissions would be consistent with GHG emissions estimated within the City's CAP, which is a qualified GHG reduction plan pursuant to CEQA Guidelines Section 15183.5. Development projects consistent with an applicable local qualified GHG reduction plan are eligible for streamlined GHG analysis under CEQA. Development projects within the City, which are consistent with the City's CAP, would be consistent with statewide GHG reduction goals for 2030 (per Senate Bill [SB] 32) and would demonstrate progress towards the 2045 GHG reduction goal established by Executive Order S-3-05. Consistency with the City's CAP is determined through the use of a CAP Consistency Review Checklist, which contains questions pertaining to how a development project would be consistent with relevant CAP strategies and measures. Projects determined to be consistent with relevant CAP strategies and measures demonstrated through regulatory compliance or mitigation would have less than cumulatively considerable GHG emissions. For projects that are subject to CAP consistency review, the first step in determining consistency is to assess the project's consistency with the growth projections used in development of the CAP. This allows the City to determine a project's consistency with the land use assumptions used in the CAP.

Step 1 of the CAP Checklist determines a project's consistency with the land use assumptions used in the CAP. A project would be deemed consistent with the City's CAP by emitting fewer than 500 MT CO₂e per year, and impacts would be less than significant. In order to determine if the project would emit less than 500 MT CO₂e per year, construction and operational GHG emissions were quantified in CalEEMod. The project is estimated to generate approximately 114.6 MT CO₂e over the construction period; however, SCAQMD guidance recommends that the emissions be amortized (i.e., averaged) over 30 years and added to operational emissions. Averaged over 30 years, the proposed construction activities would contribute approximately 3.8 MT CO₂e emissions per year. Table 7, *Total Operational GHG Emissions*, provides the operational emissions calculated for the first anticipated full year of project operation (2025) combined with amortized construction emissions. Per the project VMT analysis (Appendix H), the project would result in a reduction of VMT from project customers and an increase in VMT from project employees, resulting in a net regional VMT reduction of 1,449 miles per day (approximately 528,885 miles per year) for customers and employees. Project fuel delivery truck trips were assumed to result in an increase in regional truck VMT of 270 miles per day (98,550 miles per year). Project emissions modeling accounts for reductions in regional mobile source emissions resulting from the project's net regional reduction in VMT from customers and employees and the project's increase in regional truck VMT from fuel delivery trucks.

Table 7
TOTAL OPERATIONAL GHG EMISSIONS

Emission Sources	Emissions (MT CO₂e)
Fuel Delivery Truck Trips	-10.5
On-Site Vehicle Idling	115.1
Area	<0.1
Energy	0.9
Water/Wastewater	<0.1
Solid Waste	3.0
Subtotal¹	108.5
Construction (Annualized over 30 years)	3.8
Project Total¹	112.3

Source: HELIX 2025

¹ Totals may not sum due to rounding.

MT = metric tons; CO₂e = carbon dioxide equivalent

The estimated net increase in GHG emissions from operation of the project would be approximately 112.3 MT CO₂e per year, including amortized construction emissions. Per question 1 of the CAP Consistency Review Checklist, because the project would emit less than 500 MT CO₂e per year, in accordance with the City's CAP screening criteria, the project would be considered consistent with the CAP and is therefore not subject to the measures of the CAP (City 2020). Therefore, implementation of the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.

b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The current General Plan land use designation and zoning for the project site is Commercial. The project would be consistent with the current Commercial land use and zoning designations for the project site and would not require a general plan amendment or rezone. Therefore, the project's contribution to employment growth in the City would be consistent with the growth projections in the City's General Plan and the growth projections used to develop the SDAPCD's RAQS and Attainment Plan. Moreover, the project would be consistent with the General Plan growth projections used in the development of the Regional Plan and in the development of GHG emissions inventories and projections used in the City's CAP and CARB's 2022 Scoping Plan.

The project would result in a net reduction in regional VMT of 1,449 miles per day (approximately 528,885 miles per year) for project customers and employees (Appendix H). A reduction in regional VMT (and VMT-related GHG emissions) is a primary objective of the SANDAG Regional Plan as the San Diego County Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) in accordance with the mandates of SB 375. Implementation of the RTP/SCS plans in the state's metropolitan areas to reduce VMT is a key component of the mobile source GHG emissions reduction policies and control measures in the CARB 2022 Scoping Plan. In addition, as discussed above, the project would be consistent with the General Plan growth projections used in the development of the Regional Plan and in the development of GHG emissions inventories and projections used in the CARB 2022 Scoping Plan. Therefore, the project would be consistent with and would not obstruct the implementation of the SANDAG Regional Plan or the CARB 2022 Scoping Plan. Impacts would be less than significant.

IX. Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction activities associated with the project would require transportation and use of limited quantities of fuel, oil, sealants, and other hazardous materials related to construction. The use of hazardous materials and substances during construction would be subject to federal, state, and local health and safety requirements for handling, storage, and disposal. In addition, materials such as paints, adhesives, solvents, and other substances typically used in construction would be located at the project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the project than would occur on any

similar construction site. Construction contractors would be required to comply with applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the USEPA, California Department of Toxic Substances Control (DTSC), SDAPCD, and the RWQCB. With mandatory compliance with applicable hazardous materials regulations, the project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts related to hazardous materials during construction would be less than significant.

During operation, the City and the San Diego County Department of Environmental Health and Quality, as the Certified Unified Program Agency (CUPA), would review the project to ensure the fuel dispensing system is designed in accordance with Federal and State Water Resources Control Board (SWRCB) standards for leak detection. Specifically, this includes the use of monitored, double wall fiberglass piping, a UST monitoring system with automatic shutoffs, and a trained attendee to monitor fuel deliveries, member fuel purchases, and system operations. The transport of fuel and tank filling operations would be conducted in compliance with applicable regulatory requirements. Manufacturing and other chemical processing would not occur within the proposed fueling station. With compliance with applicable regulations, operation of the project would not generate a significant risk to the public or the environment through the potential routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. Hazardous materials releases can occur if there are existing hazardous materials at the project site that would be disturbed by project construction or operation, or if project construction or operation activities involve the handling of substantial amounts of hazardous materials with a potential to result in upset and accident conditions. As discussed in greater detail in Item IX(d), there are no listed hazardous materials sites within the project site. See Item IX(a) above with regard to handling hazardous materials during construction and operation. With mandatory compliance with applicable hazardous materials regulations, construction and operation of the project would not generate a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. Two preschools/daycare facilities are located within one-quarter mile of the proposed fuel station, including The Little People Preschool and Daycare located approximately 0.19 mile to the southwest at 920 Boardwalk and San Diego Children's Academy located approximately 0.16 mile to the southeast at 801 Grand Avenue, #7. Another preschool, Big Future Preschool, is located just beyond 0.25 mile of the proposed fuel station to the southwest at 933 West San Marcos Boulevard.

The proposed project would involve the temporary use and/or storage of fuels, oils, and other potential hazardous materials typically used during construction, and ongoing use/storage of fuels during operation. The project's use of hazardous materials during construction would be handled in accordance

with NPDES SWPPP requirements, as well as compliance with applicable federal, state, and local regulations associated with hazardous materials. Similar regulatory compliance would be required for gas station operations to prevent off-site spills or other hazardous emissions such that nearby schools would not be adversely affected by the use of hazardous materials at the project site. Adherence to applicable regulations would avoid exposure to construction-related and operational hazardous materials from occurring to nearby schools. Impacts related to emissions or handling of hazardous materials, substances, or wastes near schools would be less than significant.

d) Would the project 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?

No Impact. Pursuant to Government Code Section 65962.5 (Cortese List) requirements, the SWRCB GeoTracker database, and the DTSC EnviroStor database were searched for information regarding listed hazardous materials sites located in the project area (SWRCB 2024; DTSC 2024). No listed hazardous sites occur on the project site, but nine listed leaking underground storage tank (LUST) sites occur within 1,000 feet of the project site. Corrective action has been taken and all nine sites have a case closed status. As the project site is not located on a listed hazardous materials site, nor would it be subject to hazards associated with nearby listed properties, the project would not create a significant hazard to the public or environment. No impact would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Less Than Significant Impact. The nearest airport to the project site is the McClellan-Palomar Airport, located approximately five miles to the west. The project site is located in Review Area 2 for the McClellan-Palomar Airport but is not located within the noise contours, Accident Potential Zones, or Federal Aviation Administration height notification areas associated with this airport (San Diego County Regional Airport Authority [SDCRAA] 2011). As a result, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area. Furthermore, the project does not propose features that could result in hazards impacts on aircraft safety or operation. Impacts would be less than significant.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the Safety Element of the City's General Plan (City 2012), the San Marcos Emergency Operations Plan (EOP) governs the operations of the City during an emergency and identifies evacuation points and corresponding evacuation routes. Access to the project site would be provided via three driveways on South Bent Avenue, including a new relocated driveway just south of the proposed fuel facility and the two existing driveways to the Costco parking lot. An additional one-way egress only for fuel delivery trucks would be provided in the northern portion of the site that would connect to Linda Vista Drive. During project construction, heavy construction vehicles could interfere with emergency response to the Costco warehouse or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). However, such delays would be brief and infrequent. The project would install new driveways and internal circulation elements consistent with applicable standards and policies related to emergency access. As a result, the project

would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. Impacts would be less than significant.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. According to the Safety Element of the City's General Plan, brush management and improvements in architecture and emergency response reduce the likelihood of catastrophic occurrences of urban fires. However, increasing human encroachment into natural areas increases the likelihood of bodily harm or structural damage. This encroachment occurs in areas called the wildland-urban interface, which is considered an area within the high and very high fire hazard severity zone, as defined by the California Department of Forestry and Fire Protection (CAL FIRE). The Safety Element Fire Hazard Severity Zones map shows that the project site is not located in a Very High Fire Hazard Severity Zone or any local fire hazard severity zone (City 2012). Additionally, the project site is not within a very high fire hazard severity zone, according to 2024 CAL FIRE data (CAL FIRE 2024). Therefore, the project is not anticipated to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant. See Section XX, *Wildfire*, for additional discussion of wildfire.

X. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i. Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The discussion below is based on the Storm Water Quality Management Plan (SWQMP; Fuscoe Engineering 2024), Hydrology Report (Fuscoe Engineering 2025), and Base Flood Elevation Memorandum (Fuscoe Engineering 2024b) prepared for the project. These reports are included as Appendices D, E, and F of this document.

a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Less Than Significant Impact. The San Diego RWQCB sets water quality standards for ground and surface waters within the San Diego region. Water quality standards are defined under the Clean Water Act to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those water quality objectives. The project is located within the Richland hydrologic sub area of the San Marcos hydrologic area of the larger Carlsbad hydrologic unit (904.52). Runoff from the project site discharges into the existing public storm drain system in South Bent Avenue, conveyed southerly into San Marcos Creek, which discharges to Lake San Marcos, then Batiquitos Lagoon, and ultimately into the Pacific Ocean.

The project is subject to compliance with applicable elements of the Clean Water Act (CWA) and NPDES requirements. CWA Section 402 establishes the NPDES for regulating the discharge of pollutants into waters of the U.S. Specific NPDES requirements associated with the proposed project include conformance with State Water Resources Control Board Region-wide Municipal Separate Storm Sewer System (MS4) Permit-Order No. R9-2015-0100 and Construction General Permit Order No.2022-0057-DWQ for stormwater discharges and general construction activities. In addition to CWA NPDES requirements, states are required to identify and document polluted surface water bodies, with the resulting documentation referred to as the CWA Section 303(d) List of Water Quality Limited Segments. This list of water bodies identifies the associated pollutants and total maximum daily loads (TMDLs), along with projected TMDL implementation schedules/status. A TMDL establishes the maximum amount of an impairing substance or stressor that a water body can assimilate and still meet water quality standards and allocates that load among pollution contributors. The San Diego RWQCB is responsible for developing the 303(d) list in the San Diego region. The receiving waters for the project site that are currently listed as impaired include Upper San Marcos Creek, Lower San Marcos Creek, Lake San Marcos, and Batiquitos Lagoon. Upper San Marcos Creek is listed for benthic communities, bifenthrin, dichlorodiphenyldichloroethane, indicator bacteria, nitrogen, phosphorus, pyrethroids, selenium, total dissolved solids, and toxicity. Lower San Marcos Creek is listed for nitrogen, phosphorus, selenium, and

toxicity. Lake San Marcos is listed for ammonia, nitrogen, copper, nutrients, and phosphorus. Batiquitos Lagoon is listed for toxicity.

Project construction would include grading, which has the potential to release pollutants (e.g., oil from construction equipment, cleaning solvents, paint) and silt off-site that could impact water quality of downstream receiving waters. As required under the NPDES Construction General Permit, a SWPPP would be prepared and implemented during construction as a condition of the project. The SWPPP would identify erosion control measures to avoid or minimize erosion from exposed soil during construction activities, thereby reducing potential impacts to water quality that may result from construction activities. Through compliance with the requirements of the NPDES Construction General Permit and resulting BMP program, the project would not violate water quality standards or waste discharge requirements during construction.

Paved areas of the project site would collect dust, soil, and pollutants that would combine with surface runoff during rainfall events. Based on the proposed use of the project, expected pollutants from the project site include sediment, nutrients, heavy metals, organic compounds, trash and debris, oxygen-demanding substances, oil and grease, and pesticides. The project would be required to comply with the NPDES MS4 permit for San Diego County, of which the City is a co-permittee. The City is responsible for discharges into its MS4 facilities to the extent of its legal authority. The project meets the threshold of a Priority Development Project because it would create more than 5,000 SF of impervious surfaces on an existing site of 10,000 SF or more of impervious surfaces. Accordingly, a SWQMP has been prepared for post-construction BMPs in compliance with the City of San Marcos BMP Design Manual and MS4 Permit such as source control and permanent structural BMPs (Appendix D). Proposed permanent structural BMPs include biofiltration systems, a dual stage water/oil separator and oil stop valve, and hydromodification cisterns. Additional BMPs are identified in the SWQMP, which illustrates how low impact development BMPs have been incorporated into the project design.

Compliance with the requirements of the CWA (including Section 402 [NPDES requirements] and Section 303 [impaired water segments], and NPDES Construction General Permit) would ensure that the proposed project would not violate water quality standards or waste discharge requirements. Furthermore, the proposed project would not require the use of or otherwise substantially impair groundwater quality or interfere with groundwater recharge, as discussed further in Item X(b) below. Impacts would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The proposed project would not require the use of, or otherwise substantially interfere with, groundwater supplies or recharge compared to existing conditions. The project would utilize existing domestic water supplies and would not involve long-term use of groundwater. The project would connect to existing water facilities in the adjacent roadways. Water service in the project area is provided by the VWD, which, in turn, receives its water from the Metropolitan Water District of Southern California (MWD). MWD obtains water from local sources as well as the Colorado River, via the Colorado River Aqueduct, and the Sacramento-San Joaquin Delta, via the State Water Project. Thus, the project would not require the use of groundwater sources thereby depleting groundwater supplies.

The project site is located in the San Marcos Area Groundwater Basin 9-32 but is not located in a sustainable groundwater management plan area due to the very low priority status of the basin. Project implementation would result in a net reduction in impervious areas on the site by approximately 5,800 SF. While the majority of the site would remain impermeable after development, installation of additional landscaped areas and biofiltration systems would facilitate some groundwater recharge and percolation. In addition, due to the project site's small impervious surface area in relationship to the total size of the San Marcos Area Groundwater Basin (approximately 2,130 acres), there would not be a substantial effect upon groundwater recharge within the overall groundwater basin.

The groundwater table is estimated to be at depths of approximately 10 feet below ground surface (Appendix C). Accordingly, groundwater would likely be encountered during construction for deeper excavations associated with the proposed USTs. Temporary dewatering provisions would likely be required for the UST areas, such as sumps, trenches, and/or shoring. Some dewatering discharges may be authorized by the General Construction Permit, but a separate dewatering permit from the San Diego RWQCB may also be required (R9-2015-0013 – Groundwater Extraction Discharges). Compliance with permit requirements would ensure that groundwater would not be adversely affected by temporary dewatering during project construction. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. There are no existing streams or rivers on- or off-site that would be altered as a result of project implementation. Runoff in the northerly portion of the project site generally flows northerly to an existing inlet that connects to a 60-inch public storm drain from Linda Vista Drive to South Bent Avenue via an 18-inch storm drain. Runoff in the southerly portion of the site flows southerly to an existing inlet that connects to a 54-inch public storm drain in South Bent Avenue via a 36-inch storm drain. Upon development, the existing drainage pattern would remain the same and runoff would be collected and treated on-site by the proposed storm drain system before entering the same public storm drain facilities in the adjacent roadways. There would be four drainage management areas (DMA) within the project development area as described below:

- DMA 1 (1.06 acres) encompasses the northern drive aisles and the canopy of the proposed gas station. Runoff from the drive aisles would sheet flow in a northerly and northwesterly direction to a curb inlet on the northern edge of the project site. Roof drains on the canopy would collect flows from the canopy and route them to a biofiltration system via a 12-inch storm drain. Any incidental drainage runoff beneath the canopy would be collected by a ribbon gutter and inlets at the edge of the gas station and then routed to a dual stage water/oil separator and oil stop valve. All flows from DMA 1 would be conveyed to a hydromodification cistern and then discharged via a stormwater pump to the existing storm drain pipe that cuts across the northeastern corner of the project site from Linda Vista Road and extends to the south in South Bent Avenue (point of connection [POC] 1).

- DMA 2 (0.98 acres) encompasses the central drive aisles and vehicle queue areas of the gas station. Runoff from the drive aisles would sheet flow in a southerly direction to a curb inlet and then be routed to a biofiltration system in the central portion of the site. All flows from DMA 2 would be conveyed to a hydromodification cistern and then discharged via a stormwater pump to the existing storm drain pipe in South Bent Avenue (POC 2).
- DMA 3 (0.35 acres) encompasses the southern drive aisles and parking areas. Runoff from the drive aisles would sheet flow in a northerly direction to a curb inlet and then be routed to a biofiltration system in the southern portion of the project development area. All flows from DMA 3 would be conveyed to a hydromodification cistern and then discharged to the existing storm drain pipe in South Bent Avenue (POC 2).
- DMA 4 (0.03 acre) encompasses a small area in the northern and southeastern portions of the site that consist of proposed driveways. These areas would continue to sheet flow off-site to their respective streets.

Project development would result in a net decrease of impervious surfaces by approximately 6,700 SF and a net increase in pervious surfaces by approximately 5,800 SF. The additional pervious areas would consist of landscaped areas, which would be stabilized so as to avoid erosion effects. Because the on-site impervious area would decrease and the project proposes biofiltration basins and hydromodification cisterns, runoff volume rates would not be expected to increase and thus, would not adversely affect the project area or downstream areas associated with substantial erosion or siltation.

In addition, the project would comply with applicable storm water regulations associated with the MS4 Permit and would be required to prepare a SWPPP that would further reduce the potential for substantial erosion and siltation during construction and project operation, as discussed in Item VII(b). Therefore, the proposed project would 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 substantial erosion or siltation on- or off-site. Impacts would be less than significant.

ii. 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. There are no existing streams or rivers on- or off-site that would be altered as a result of project implementation. As discussed above in Item X(c)(i), the proposed project would not substantially alter the existing drainage pattern of the project site or area, and the on-site impervious area would slightly decrease upon development of the project. The project-specific hydrology report (Appendix E) concluded that the proposed drainage facilities have been sized accordingly to accommodate project storm flows such that the surrounding area and downstream facilities would not be adversely impacted. Furthermore, the base flood elevation analysis prepared for the project (Appendix F) concluded that the project would not alter the base flood elevation. Therefore, the project would not substantially increase the rate or amount of surface runoff which would result in flooding on- or off site. Impacts would be less than significant.

iii. *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?*

Less Than Significant Impact. As previously described, the project includes an on-site drainage system to accommodate project-generated runoff. This proposed system including the detention chambers has been designed and sized appropriately such that post-development runoff generated by the project would not exceed the capacity of the existing municipal storm drain system. Additionally, the project includes a dual stage water/oil separator and oil stop valve and biofiltration systems to treat contaminants generated by the proposed use before runoff is discharged off-site. The biofiltration systems would provide additional filtration and reduce the possibility of polluted runoff infiltrating the stormwater drainage system. The project would be required to comply with the NPDES MS4 permit for San Diego County, of which the City is a co-permittee, and would implement the appropriate treatment BMPs to demonstrate compliance with regulations regarding runoff. Therefore, the project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff. Impacts would be less than significant.

iv. *Impede or redirect flood flows?*

Less Than Significant Impact. Based on Federal Emergency Management Agency (FEMA) mapping (Flood Insurance Rate Map [FIRM] Number 06073C0793G), the majority of the project site is located within Flood Zone X but the southernmost portion of the project site is located within Flood Zone AE (Appendix E). Flood Zone AE is defined as areas with a one percent annual chance flood event with base flood elevations. Flood Zone X are areas of minimal flood hazard outside the 500-year flood and areas determined to be outside the 0.2 percent annual chance flood. No structures would be constructed within the portion of the site that is within Flood Zone AE besides a driveway and landscaped medians, which would not impede or redirect existing flood flows. The base flood elevation analysis prepared for the project (Appendix F) concluded that the change in water surface elevation resulting from the project due to the proposed landscaped medians would not have any impact on the base flood elevation. As such, the project would not increase the 100-year water surface elevations or result in flooding on or off-site. Therefore, the project would 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 through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. Impacts would be less than significant.

d) *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

Less Than Significant Impact. As described above, the southern portion of the project development area is located within mapped flood hazard Zones AE and X (FEMA 2024), but the project would provide new stormwater infrastructure that would accommodate flood flows. Additionally, the project would not expose people or structures to flooding as a result of the failure of a levee or dam. There are no dams immediately upstream of the project site, although the site is located upstream of the Lake San Marcos dam (approximately 2.5 miles to the southwest) and near the Discovery Lake dam (approximately 1.1 miles to the south) and South Lake dam (approximately 1.8 miles to the southeast). According to the Safety Element of the City's General Plan, the project is not located within a Dam Inundation Area associated with these dams (City 2012). As a result, flooding is not anticipated to occur on the project site. Impacts related to the release of pollutants due to floods would be less than significant.

Tsunamis are typically generated by seismic activity, which causes displacement of the ocean floor, resulting in large waves. The project site is located approximately eight miles inland from the Pacific Ocean and is not located within a designated tsunami inundation zone due to distance from the ocean. Therefore, there is little to no potential risk from a tsunami inundating the project site. A seiche is a standing wave in an enclosed or partly enclosed body of water. Seiches are normally caused by earthquake activity, and can affect harbors, bays, lakes, rivers, and canals. The nearest enclosed body of water, Lake San Marcos, is approximately one mile downstream from the site, which is too far to result in inundation at the project site during a seiche event. No impact related to the release of pollutants due to tsunamis, or seiches would occur.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Carlsbad Management Area Water Quality Improvement Plan was prepared in June 2016 for the Carlsbad Watershed Management Area Responsible Agencies, which include the Cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista, and the County of San Diego (Project Clean Water 2021). The purpose of the Carlsbad Water Quality Improvement Plan is to guide the Responsible Agencies' jurisdictional runoff management plans towards achieving improved water quality in MS4 discharges (or stormwater discharges) and receiving water bodies. The project site is located within the San Marcos Hydrologic Area, which is the second largest within the Carlsbad Watershed Management Area. The Carlsbad Management Area Water Quality Improvement Plan outlines areas of priority water quality conditions and highest priority water quality conditions to help guide jurisdictional actions. While the Carlsbad Management Area Water Quality Improvement Plan does not establish requirements for individual projects, the project would implement BMPs identified in a SWPPP during construction and SWQMP during post-development operation, which would reduce the potential for pollutants to be released from the site in accordance with the Construction General Permit and MS4 permit. As such, the project would not conflict with or obstruct implementation of the Carlsbad Management Area Water Quality Improvement Plan or other water quality plans prepared for the region. Further, the site is not located within a sustainable groundwater management plan area. Impacts would be less than significant.

XI. Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐

a) Would the project physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impact mobility within an existing community or between a community and outlying area. The project would occur in a developed site already served by existing roadways and utility infrastructure and does not include the construction of public roads, structures, or other improvements that would physically divide or separate neighborhoods. Therefore, the project would not physically divide an established community. No impact would occur.

b) Would the project cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant with Mitigation Incorporated. The existing General Plan land use designation and zoning for the project site is Commercial. The project does not propose to change the site's land use designation or zoning and involves a gas station that would be consistent with the Commercial designation with approval of a Conditional use Permit (CUP), which is proposed as part of the project.

Applicable policies contained in the General Plan that are intended to avoid or lessen environmental effects are generally within the goals and policies of the Conservation and Open Space Element. These goals and policies and a project consistency analysis of them are provided below in Table 8, *General Plan Environmental Policies Consistency Analysis*.

Table 8
GENERAL PLAN ENVIRONMENTAL POLICIES CONSISTENCY ANALYSIS

Goal/Policy	Project Consistency
Conservation and Open Space Element	
Goal COS-1: Identify, protect, and enhance significant ecological and biological resources within San Marcos and its adaptive Sphere of Influence.	Consistent. The project site is almost entirely developed and does not contain ecological or biological resources. The site is adjacent to an open space area to the west that contains native vegetation and vernal pools; however, the project would not directly or indirectly impact this adjacent area. Refer to Section IV, <i>Biological Resources</i> .
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 biological habitats.	Consistent. The project site is almost entirely developed and does not contain sensitive biological resources or function as a wildlife corridor. The site is adjacent to an open space area to the west that contains native vegetation and vernal pools; however, the project would not directly or indirectly impact this adjacent area. Refer to Section IV, <i>Biological Resources</i> .
Policy COS-2.1: Provide and protect open space areas throughout the City for its recreational, agricultural, safety, and environmental value.	Consistent. The site is adjacent to an open space area to the west that contains native vegetation and vernal pools; however, the project would not directly or indirectly impact this adjacent open space area. Refer to Section IV, <i>Biological Resources</i> .

Goal/Policy	Project Consistency
Policy COS-2.5: Continue to review future development proposals to ensure that cultural resources (including prehistoric, historic, paleontological, and Senate Bill 18 Tribal resources) are analyzed and conserved in compliance with CEQA requirements.	Consistent. An Archaeological Resources Survey was conducted for the project (Appendix B) to identify archaeological and historic resources within the project site. The survey concluded that no historic properties or historical resources would be impacted. While no archaeological resources were identified on the project site, this area of the City is highly sensitive for cultural resources based on the numerous sites that have been recorded in the project area. Therefore, there is potential for unknown subsurface archaeological resources to be encountered during construction-related ground disturbance. An archaeological and Native American monitoring program (mitigation measures CUL-1 through CUL-4) would be implemented during construction activities that would address archaeological finds. Refer to Section V, <i>Cultural Resources</i>. Additionally, proposed excavation during construction could potentially encounter paleontological resources in the underlying geologic formations that have a moderate paleontological sensitivity rating. Implementation of a paleontological mitigation program (mitigation measures GEO-1 through GEO-6 below), would address discovery of fossils. Refer to Item VII(f).
Policy COS-2.6: Preserve healthy mature trees where feasible; where removal is necessary, trees shall be replaced at a ratio of 1:1.	Consistent. The project site consists of developed land with some ornamental vegetation in landscaped areas, including trees. A total of 23 existing trees would be removed and 17 existing trees would be protected on-site. The project landscape plan proposes more vegetation and trees than currently exist on-site; specifically, 28 trees would be planted to offset the 23 trees that would be removed, which exceeds the 1:1 replacement ratio. Refer to Item IV(e).
Policy COS-3.4: Evaluate potential impacts to visual and aesthetic resources, including the potential to create new light sources, while still maintaining and being sensitive to rural lighting standards.	Consistent. An analysis of potential visual impacts resulting from the project is provided in Section I, <i>Aesthetics</i>. As discussed, the project would not result in a substantial adverse effect on a scenic vista, would not substantially damage scenic resources within a state scenic highway, would not conflict with regulations governing scenic quality, and would not create a new source of substantial light or glare in the project area. Although the project would introduce new sources of light, project lighting would be of similar nature to the surrounding land uses and the project would adhere to applicable lighting regulations.

Goal/Policy	Project Consistency
Policy COS-4.6: Promote efficient use of energy and conservation of available resources in the design, construction, maintenance and operation of public and private facilities, infrastructure and equipment.	Consistent. The project would comply with applicable energy standards and regulations during construction. The project would be built and operated in accordance with existing applicable regulations at the time of construction, including Title 24 Part 6 building energy efficiency requirements and Title 24 Part 11 CALGreen requirements. Furthermore, the project would result in a net reduction in regional VMT and a net reduction in transportation energy use. Refer to Section VI, <i>Energy</i> .
Policy COS-8.4: Require new development and redevelopment to protect the quality of water bodies and natural drainage systems through site design, source controls, storm water treatment, runoff reduction measures, Best Management Practices (BMPs), low impact development (LID), hydromodification strategies consistent with the Current San Diego Regional Water Quality Control Board Municipal Stormwater National Pollutant Discharge Elimination System (NPDES) Permit, and all future municipal stormwater permits.	Consistent. As required under the NPDES Construction General Permit, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented during project construction. The SWPPP would identify construction BMPs that would be implemented to avoid or minimize impacts to water quality that may result from construction activities, such as the use of silt fencing, fiber rolls, and sandbags. The project would also be required to comply with the NPDES MS4 permit for San Diego County, of which the City is a co-permittee. A SWQMP (Appendix D) has been prepared for the project and includes post-construction BMPs in compliance with the City of San Marcos BMP Design Manual and MS4 Permit. Proposed post-construct BMP features include biofiltration systems, a dual stage water/oil separator and oil stop valve, and hydromodification cisterns. Additional BMPs are identified in the SWQMP, which illustrates how low impact development BMPs have been incorporated into the project design. Refer to Section X, <i>Hydrology and Water Quality</i> .
Safety Element	
Policy S-1.1: Reduce the risk of impacts from geologic and seismic hazards by applying current and proper land use planning, development engineering, building construction, and retrofitting requirements.	Consistent. A project-specific geotechnical study was prepared for the project (Appendix C) to evaluate the adequacy of the site for the proposed development and included recommendations for construction of the project. These recommendations would be implemented, as appropriate, and the project would be designed in accordance with applicable seismic parameters of the current California Building Code to reduce the risk of geologic and seismic hazards. Refer to Section VII, <i>Geology and Soils</i> .
Goal S-2: Minimize the risk to people, property, and the environment due to flooding hazards.	Consistent. The southern portion of the project development area is located within mapped flood hazard zones, but the project would not place any structures in the floodplain or redirect flood flows. The project would provide new stormwater infrastructure that has been sized and designed to accommodate project-generated runoff volumes. Refer to Items X(c)(ii) and X(c)(iv).

Goal/Policy	Project Consistency
Policy S-3.1: Require development to be located, designed and constructed to provide adequate defensibility and reduce the risk of structural loss and life resulting from wildland fires. Development will consider hazards relative to terrain, topography, accessibility, and proximity to vegetation. One such provision for development to minimize the risk of structural loss and life shall be the inclusion of overhead fire sprinklers.	Consistent. The project site is not located in a Very High Fire Hazard Severity Zone or any local fire hazard severity zone. Therefore, the project is not anticipated to expose people or structures to a risk of loss, injury, or death involving wildland fires. Refer to Item IX(g) and Section XX, <i>Wildfire</i>.
Policy S-4.1: Promote and support the proper disposal, handling, transport, delivery, treatment, recovery, recycling, and storage of hazardous materials in accordance with applicable federal, State, and local regulations.	Consistent. The use of hazardous materials and substances during construction would be subject to federal, state, and local health and safety requirements for handling, storage, and disposal. Construction contractors would be required to comply with applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the USEPA, DTSC, SDAPCD, and the RWQCB. During operation, the City and the San Diego County Department of Environmental Health and Quality, as the CUPA, would review the project to ensure the fuel dispensing system is designed in accordance with federal and SWRCB standards for leak detection. The transport of fuel and tank filling operations would be conducted in compliance with applicable regulatory requirements. Refer to Section IX, <i>Hazards and Hazardous Materials</i>.
Policy S-4.3: Require that land uses using hazardous materials be located and designed to ensure sensitive uses, such as schools, hospitals, day care centers, and residential neighborhoods, are protected.	Consistent. The proposed project would involve the temporary use and/or storage of fuels, oils, and other potential hazardous materials typically used during construction, and ongoing use/storage of fuels during operation. The project's use of hazardous materials during construction would be handled in accordance with NPDES SWPPP requirements, as well as compliance with applicable federal, state, and local regulations associated with hazardous materials. Similar regulatory compliance would be required for gas station operations to prevent off-site spills or other hazardous emissions such that nearby sensitive uses would not be adversely affected by the use of hazardous materials at the project site. Refer to Item IX(c).
Noise Element	
Policy N-1.1: Address the potential for excessive noise levels when making land use planning decisions in accordance with Table 7-3 Land Use Compatibility Noise Standards.	Consistent. The project would not conflict with the City's noise – land use compatibility guidelines contained in Table 7-3 of the Noise Element. The project consists of a gas station that does not include, or is not required to include, exterior use areas. The Noise Element states that exterior noise standards do not apply for land uses where no exterior use area is proposed or necessary.

Goal/Policy	Project Consistency
Policy N-1.2: Ensure that acceptable noise levels are maintained near noise-sensitive uses.	Consistent. Project construction activities, on-site operations, or project-generated traffic would not generate a substantial increase in noise levels at nearby noise-sensitive land uses due to distance and exposure to existing ambient noise, primarily from traffic along the State Route 78 corridor. Refer to Item XIII(a).
Policy N-2.1: Encourage only noise-compatible land uses along existing and future roadways, highways, and freeways.	Consistent. The General Plan Noise Element contains noise – land use compatibility guidelines for new development projects and establishes maximum noise levels at exterior use areas for various land uses. The project would not conflict with the City’s noise – land use compatibility guidelines in that it is a commercial use in a developed area on a site that is designated for commercial uses. The project consists of a gas station that does not include, or is not required to include, exterior use areas. The Noise Element states that exterior noise standards do not apply for land uses where no exterior use area is proposed or necessary.

As discussed in Table 8, the project would be consistent with applicable General Plan goals and policies with implementation of mitigation measures identified in this IS.

The General Plan Noise Element contains noise – land use compatibility guidelines for new development projects. Maximum exterior noise levels for transportation-related noise are considered acceptable at 60 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL) for single-family residential, mobile homes, and senior housing land uses, and 65 dBA CNEL for multi-family residential, mixed-use residential, and most other land use categories. Higher noise levels can be considered “conditionally acceptable” under certain conditions and upon detailed noise analysis. The Noise Element states that exterior noise standards do not apply for land uses where no exterior public use area (such as a swimming pool, patio, or open landscaped area) is proposed or necessary, which is the case for the proposed project as a gas station. Therefore, the project would not conflict with the City’s noise – land use compatibility guidelines.

The project would also be consistent with the City’s CAP, as discussed in Section VIII, *Greenhouse Gases*. The project’s contribution to employment growth in the City would be consistent with the growth projections in the City’s General Plan and the growth projections used to develop the SDAPCD’s RAQS and Attainment Plan. Moreover, the project would be consistent with the General Plan growth projections used in the development of the Regional Plan and in the development of GHG emissions inventories and projections used in the City’s CAP and CARB’s 2022 Scoping Plan.

Based on the above analysis, the project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant with mitigation incorporated.

XII. Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

No Impact. The Surface Mining and Reclamation Act of 1975 required the classification of land into mineral resource zones (MRZ) according to known or inferred mineral resource potential. As such, the DOC classifies the availability of mineral resources in a region into one of four MRZ categories: MRZ-1 for no mineral resources, MRZ-2 for significant resource areas where the quality and quantity of mineral resources are known, MRZ-3 for significant resource areas where the quality and quantity of mineral resources are unknown, and MRZ-4 for areas with no information available. According to the City's Conservation and Open Space Element, MRZ-4 covers the majority of the developed area of the City, and the project site is not within one of the specific areas designated as MRZ-2 (City 2012). Accordingly, it is assumed the project site is classified as MRZ-4. The project site is not currently being utilized for mineral extraction and does not contain any known mineral resources that would be of value to the region. Further, the site is zoned and planned for commercial uses and not extractive uses. Therefore, implementation of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur.

b) *Would the project 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. As stated above in Item XII(a), the City's General Plan does not consider the project site to be a significant mineral resource area. Additionally, the project site is not used for mineral extraction and is not known as a locally important mineral resource recovery site. Further, the project site is not delineated on any plan for mineral resource recovery uses. No impact would occur.

XIII. Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

a) *Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Less Than Significant Impact. The project site is located in an urbanized area of the City and is subject to various noise sources, most notably vehicular traffic noise on roadways and highways. According to the General Plan Noise Element, the most substantial noise sources in the City are from car and truck traffic on SR 78, which is as close as approximately 100 feet to the northeast of the project site.

Construction Noise

Chapter 10.24.020 (b)(9) of the SMMC limits construction activities on Monday through Friday before 7:00 a.m. and after 6:00 p.m., or on Saturdays before 8:00 a.m. or after 5:00 p.m., but does not establish numeric noise standards for construction. The City has adopted the County's construction noise threshold of not exceeding 75 dBA for an 8-hour period, between 7:00 a.m. and 7:00 p.m., when measured at any occupied property where the noise is being received. This threshold provides a reasonable balance between the need to operate noise-generating equipment for most temporary construction activities and the desire to protect NSLUs from temporary disturbances. The project would also be required to comply with the grading operation restrictions listed in SMMC Section 17.32.180. This section of the SMMC addresses the time limits that apply to grading, extraction, and blasting between 7:00 a.m. and 4:30 p.m. Monday to Friday. Grading, extraction, blasting, or related earth moving is not allowed in the City on weekends or holidays.

The proposed project would generate temporary increases in noise within the project area during its construction. Construction of the project would require demolition, grading, building construction, paving, and architectural coating. Construction is not planned to occur during evening and weekend

hours. Noise levels would fluctuate, depending on the construction activity, equipment type, and distance between noise source and receiver. Additionally, noise from construction equipment would vary dependent on the construction phase and the number and type of equipment in use at any given time. The loudest construction equipment/vehicles operating on the project site are anticipated to be an excavator (76.7 dBA at a reference point of 50 feet), roller (73.0 dBA at 50 feet), and backhoe (73.6 dBA at 50 feet) during demolition/site preparation and grading (U.S. Department of Transportation 2008). The use of these pieces of equipment would be intermittent and would not exceed 8 hours per day.

NSLUs typically include residential uses (e.g., single- and multi-family, mobile homes), guest lodging, hospitals, nursing homes and other long-term medical care facilities, parks and outdoor recreational facilities, schools, libraries, churches, and places of public assembly. There are no existing NSLUs adjacent to the project site. The closest existing NSLUs to the proposed fueling station include three daycare centers at distances of 0.16 mile or greater and residences that are 0.24 mile away or greater. Potential future NSLUs in the project area include two mixed-use developments, the closest of which would be approximately 0.16 mile from the proposed fueling station. Based on the distances between the project site and NSLUs in the area and a general noise attenuation factor of 6 dBA per doubling of distance, the loudest construction equipment would generate noise levels of less than 75 dBA at these NSLUs. Calculations based on this general noise attenuation factor are provided in Table 9, *Estimated Construction Noise Levels at Reference Distances*.

Table 9
ESTIMATED CONSTRUCTION NOISE LEVELS AT REFERENCE DISTANCES

Equipment	Estimated Noise Level (dBA)					
	50 Feet	100 Feet	200 Feet	400 Feet	800 Feet	1,600 Feet
Excavator	76.7	70.7	64.7	58.7	52.7	46.7
Roller	73.0	67.0	61.0	55.0	49.0	43.0
Backhoe	73.6	67.6	61.6	55.6	49.5	43.5

These calculations are conservative in that they do not account for existing ambient noise sources, such as traffic on SR 78, or noise attenuation from intervening development. Based on these calculations, construction noise levels (estimated 8-hour average) from the loudest equipment would be less than 52.7 dBA at the closest daycare center and future mixed-use development, which are both approximately 0.16 mile (845 feet) from the project site. Similarly, construction noise levels (estimated 8-hour average) from the loudest construction equipment at the closest residence (0.24 mile or 1,268 feet away) would also be less than 52.7 dBA. Therefore, construction noise would not exceed 75 dBA for an 8-hour period at any nearby NSLUs, and project construction would be consistent with the City's construction noise threshold. Construction noise impacts would be less than significant.

Operational Noise

On-Site Noise

The project is not considered a land use noise generator in that it would not involve equipment, features, or other stationary noise sources that would generate loud noise. The City's Noise Ordinance (Chapter 10.24 of the SMMC) does not establish quantitative noise standards for on-site stationary noise sources. As shown in Noise Element Figures 7-1 and 7-2, the project site and nearby NSLUs (identified above) are located within the 70-CNEL noise contour associated with SR 78 vehicular traffic under both existing and future conditions. The future conditions noise contours are based on the planned land uses

as designated by the General Plan. The project would be consistent with the General Plan land use designation and zoning of Commercial and, as such, noise generated by uses at the project site is anticipated in the future noise contours shown in Noise Element Figure 7-2. Because noise levels would be within the 70-CNEL contour with or without the project, on-site operational noise levels generated by the project would not result in a substantial permanent increase in ambient noise levels in the vicinity of the project. Furthermore, operational noise attributable to on-site operations of the new fueling facility would not be appreciably different from existing on-site noise. Associated operational noise impacts would be less than significant.

Traffic Noise

The City has not established standards for determining the significance of increases in transportation noise resulting from a development project. Therefore, the standards of significance are based on perceived increases in ambient noise levels. Impacts would be considered significant in areas where existing traffic noise at NSLUs exceeds 60 CNEL (the City General Plan noise compatibility level for residential uses), and implementation of the project would result in an increase of the noise level by three CNEL or more. In general, a three-dBA (CNEL) increase occurs when traffic volumes on an adjacent roadway segment double (i.e., 100 percent increase). Based on the LTA prepared for the project (Appendix G), none of the analyzed roadway segments in the project area (along South Las Posas Road, Grand Avenue, South Bent Avenue, and West San Marcos Boulevard) would experience a doubling of traffic volumes with the addition of project traffic. The greatest increase would be an approximately six percent increase in average daily trips on South Bent Avenue between Grand Avenue and West San Marcos Boulevard. Therefore, the traffic noise generated by the project would not result in a substantial permanent increase in ambient noise levels. Associated operational noise impacts would be less than significant.

b) Would the project generate excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The project may generate minor ground vibrations during construction from the use of heavy machinery, excavation equipment, and jackhammers. The use of this equipment would be intermittent and temporary, and no pile drivers or any other construction type known to create excessive ground vibrations would be required. Vibration attenuates rapidly with distance. Given that the closest receptor is located at a distance of 0.16 mile, vibration levels at the NSLU's would not be excessive. The proposed project does not include operational components that would generate substantial vibration. Fuel delivery diesel trucks can generate some vibration levels, but not to the extent that would adversely affect NSLUs in the project area, given the distance between the vibration source and the at the closest receptor. Therefore, the project would not generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. The closest airport or private airstrip to the project site is the McClellan Palomar Airport, approximately five miles to the west. The project site is within Review Area 2 of the McClellan Palomar Airport, which lies outside of the noise contours for the airport (SDCRAA 2011). Therefore, the project would not expose people residing or working in the project area to excessive noise from aircraft or airport operations. Impacts would be less than significant.

XIV. Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The proposed project does not include residential development that would directly increase the number of residents in the area or contribute to the creation of additional housing in the City. The project includes uses that would employ local populations but would not create a substantial number of employment opportunities, either during construction or operation, to induce additional population growth in the area. Furthermore, the project would not result in the extension of roads or other infrastructure that would indirectly induce substantial population growth. Therefore, the proposed project would not induce substantial population growth in an area, either directly or indirectly. Impacts would be less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project includes the development of a commercial use on land that is developed with a surface parking lot for the associated commercial use. No housing occurs on the project site. Thus, the proposed project would not displace existing housing, necessitating the construction of replacement housing elsewhere. Moreover, the project site is not designated or zoned for residential land uses and, therefore, project implementation would not remove land assigned for this purpose thereby indirectly resulting in the need for housing elsewhere. No impact would occur.

XV. Public Services

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

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

i. Fire protection?

Less Than Significant Impact. The project site is located in a developed area currently served by fire protection services, and project implementation would not require the construction of new or expanded fire facilities. The San Marcos Fire Department (SMFD) provides fire protection services within the City and has four fire stations within its boundaries—the closest station to the project site is Fire Station No. 1, located at 180 West Mission Road, approximately one mile east of the site. As such, the nearest fire station and presumed first responder is Station No. 1. The project site would include commercial land uses that, like most land uses, may require fire protection services during their lifespan. There may be occurrences or events where paramedics or other fire protection personnel would be needed to provide services at the site. The project, however, is anticipated to require only four employees (Appendix H), which would not substantially increase population in the project area or otherwise interfere with the ability of existing fire services to maintain acceptable service ratios, meet target response times, or other performance objectives for fire protection. During construction, fire protection may be required, but these would be short-term demands and would not require increases in the level of public service offered or affect response times. The project site is already annexed into a Community Facilities District (CFD98-01: Police and Fire) and participation in the CFD would offset the cost of increases in necessary

fire services resulting from the implementation of the proposed project. Impacts would be less than significant.

ii. Police protection?

Less Than Significant Impact. The project site is located in a developed area currently served by police protection services, and project implementation would not require the construction of new or expanded police facilities. The City contracts with the San Diego County Sheriff's Department to provide police protection services within the City and has a police station located at 182 Santar Place, approximately two miles east of the project site. The project site would include commercial land uses that, like most land uses, may require police protection services during their lifespan. There may be occurrences or events where police protection personnel would be needed to provide services at the site. However, the addition of four employees at the project site would not substantially increase population in the project area or otherwise interfere with the ability of police services to maintain acceptable service ratios, meet target response times, or other performance objectives for police protection. The project site is already annexed into a CFD (CFD98-01: Police and Fire) and participation in the CFD would offset the cost of increases in necessary police services resulting from the implementation of the proposed project. Impacts would be less than significant.

iii. Schools?

No Impact. The project would not create a direct demand for public school services, as the proposed project does not include a residential component that would directly generate population growth (i.e., school-aged children requiring public education). Additionally, no component of the project would measurably increase public school demands or result in the need for new or physically altered school facilities. Nonetheless, the project applicant would be required to pay applicable school fees pursuant to California Education Code Section 17620 et seq. and Government Code Sections 65995(h) and 65996(b) in effect at the time of building permit issuance. No impact would occur.

iv. Parks?

No Impact. The proposed project involves the construction and operation of a fueling station. It is not anticipated to result in a direct increased use or demand for parks as the proposed project does not include a residential component that would directly generate population growth that would require the construction or expansion of additional park and recreational facilities. Likewise, the addition of four employees on the project site would not create a substantial increased demand for park and recreational facilities. No impact would occur.

v. Other public facilities?

No Impact. Other public facilities may include libraries, senior centers, community centers, and pools, all of which are intended to serve the general public. The project site is located in a developed area where public services such as these are already provided. The proposed project involves the construction and operation of a fueling station that would add four employees to the project site, which would not result in a direct increased demand on these services that would require the construction or expansion of other public facilities. No impact would occur.

XVI. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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?*

No Impact. The proposed project consists of construction and operation of a gas station. The project would not directly increase the use of or create the need for new parks and recreational facilities because the project does not include a residential component that would directly generate population growth that would require the construction or expansion of additional park and recreational facilities. Likewise, the addition of four employees on the project site would not create a substantial increased demand for park and recreational facilities. While there is open space adjacent to the project site to the west, the area is not open to the public or used for or planned for recreation as it is a biological preserve. Therefore, the project would not result in the use of available parks or recreational facilities such that substantial physical deterioration occurs, or that would require the construction or expansion of recreational facilities to satisfy demand. No impact would occur.

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?*

No Impact. The proposed project consists of construction and operation of a gas station that would not require or result in the need to construct or expand recreational facilities. In addition, no recreational facilities are proposed by the project. Therefore, no impact would occur.

XVII. Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

The discussion below is based in part on the Local Transportation Analysis (Kittelson & Associates 2025) and a Regional VMT Assessment (Kittelson & Associates 2024) prepared for the project. These reports are included as Appendices G and H of this document.

a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The project site is located in an urban part of the City with existing bicycle, pedestrian, and transit facilities. Class II bike lanes and pedestrian sidewalks are generally provided throughout the area, with pedestrian crossings located at intersections surrounding the project site. The site is also served by existing transit. The project site is within a quarter mile of a bus stop with connections to Sprinter service. Plans for transportation facilities in project area include the City's General Plan Mobility Element. The project's consistency with the Mobility Element in terms of the circulation system is discussed below.

Roadways

It is noted that the effect of a project on traffic delay is not a significant impact under CEQA and level of service (LOS) or other measures of vehicle capacity or traffic congestion is no longer the performance metric to evaluate transportation impacts under CEQA. However, a discussion of LOS is included in this analysis of roadways to consider consistency with programs addressing the circulation system. The City's General Plan Mobility Element sets a goal of LOS D or better for roadway facility vehicular operations within the City (City 2012). However, the Mobility Element also allows for flexible LOS (e.g., lower) in locations within the Urban Core of San Marcos or where widening is not feasible. The project site is located within the City's Urban Core, specifically Urban Core Focus Area 3, San Marcos Boulevard Focus Area, as described in the General Plan Land Use and Community Design Element (General Plan Figure 2-10).

The LTA analyzed 14 intersections and 10 roadway segments in the project area for the typical weekday AM, weekday PM, and Saturday mid-day peak hours under existing conditions (year 2023), near-term conditions (year 2025) without and with the project, and horizon conditions (year 2050) without and with the project. A summary of the analyzed intersection operations is presented in Table 10, *Intersections LOS Summary*, and a summary of the analyzed roadway segments is presented in Table 11, *Roadway Segment LOS Summary*. Intersections and roadway segments shaded light gray in Tables 10 and 11 denote those facilities that currently, or are projected to, operate at LOS E or F under existing, near-term, and/or horizon conditions.

Table 10
INTERSECTIONS LOS SUMMARY

Intersection	Existing (AM/PM/SAT)	Near-Term Without Project (AM/PM/SAT)	Near-Term With Project (AM/PM/SAT)	Horizon Without Project (AM/PM/SAT)	Horizon With Project (AM/PM/SAT)
South Las Posas Road/ SR 78 WB Ramps	D/C/C	D/C/C	E/C/D	D/C/C	E/C/D
South Las Posas Road/ Grand Avenue	D/E/D	E/F/D	E/F/D	D/F/D	E/F/D
Grand Avenue/Via Vera Cruz/SR 78 EB Ramps	D/E/D	D/E/D	D/F/E	E/F/D	E/F/E
Grand Avenue/Linda Vista Drive	B/D/B	B/E/C	C/F/C	B/F/B	B/F/C
South Bent Avenue/Grand Avenue	B/B/B	B/B/B	B/C/C	B/C/B	B/D/C
South Bent Avenue/ Northern Costco Driveway	B/B/B	B/B/B	C/F/F	B/B/B	C/F/F
South Bent Avenue/ Industrial Driveway	B/A/B	B/A/B	B/B/B	B/B/B	B/B/B
South Bent Avenue/ Middle Costco Driveway	B/B/B	B/B/B	B/C/C	B/B/B	B/C/C
South Bent Avenue/ Southern Costco Driveway	C/C/C	B/C/C	D/F/F	C/C/D	D/F/F
Via Vera Cruz/West San Marcos Boulevard	C/C/D	C/C/D	C/C/D	C/C/D	C/C/C
South Bent Avenue/West San Marcos Boulevard	C/C/D	D/C/D	D/E/E	D/D/D	D/E/E
West San Marcos Boulevard/Grand Avenue	D/F/E	D/F/E	D/F/E	D/F/F	D/F/F
SR 78 EB Ramps/West San Marcos Boulevard	A/A/B	A/A/B	A/A/B	A/A/B	A/A/B
Knoll Road/West San Marcos Boulevard	C/C/C	C/C/C	C/C/C	C/C/C	C/C/C

Source: Kittelson 2025

WB = westbound; EB = eastbound

Table 11
ROADWAY SEGMENTS LOS SUMMARY

Roadway Segment	Existing	Near-Term Without Project	Near-Term With Project	Horizon Without Project	Horizon With Project
<i>South Las Posas Road</i>					
SR 78 WB Ramp to Grand Avenue	B	B	B	C	C
<i>Grand Avenue</i>					
South Las Posas Road to Via Vera Cruz	D	D	D	E	E
Via Vera Cruz to Linda Vista Drive	B	B	B	C	C
Linda Vista Drive to South Bent Avenue	C	C	C	D	D
South Bent Avenue to West San Marcos Boulevard	B	B	B	C	C
<i>South Bent Avenue</i>					
Grand Avenue to West San Marcos Boulevard	B	C	C	C	C
<i>West San Marcos Boulevard</i>					
Via Vera Cruz to South Bent Avenue	F	F	F	F	F
South Bent Avenue to Grand Avenue	F	F	F	F	F
Grand Avenue to SR 78 EB Ramp	F	F	F	F	F
SR 78 EB Ramp to Knoll Road	E	E	E	F	F

Source: Kittelson 2025

WB = westbound; EB = eastbound

As shown in Tables 10 and 11, some intersections and roadway segments in the project area currently operate at LOS E or F, and would continue or are projected to operate at LOS E or F upon project implementation under near-term (year 2025) and horizon year (2050) conditions. These intersections and roadway segments include the following:

- South Las Posas Road/SR 78 westbound ramps
- South Las Posas Road/Grand Avenue
- Grand Avenue/Via Vera Cruz/SR 78 eastbound ramps
- Grand Avenue/Linda Vista Drive
- South Bent Avenue/Northern Costco Driveway
- South Bent Avenue/Southern Costco Driveway
- West San Marcos Boulevard/Grand Avenue
- Grand Avenue between South Las Posas Road and Via Vera Cruz
- West San Marcos Boulevard between Via Vera Cruz and South Bent Avenue
- West San Marcos Boulevard between South Bent Avenue and Grand Avenue
- West San Marcos Boulevard between Grand Avenue and SR 78 eastbound ramp
- West San Marcos Boulevard between SR 78 eastbound ramp and Knoll Road

In the case of roadway segments, the same segments that would operate at LOS E or F with the project would also operate at LOS E or F without the project. The project would not cause the LOS of any roadway segment to degrade from D to E or from E to F, and project-generated traffic on these roadway segments would not substantially exacerbate existing operational conditions.

With regard to intersections (refer to Table 10), five off-site intersections in the project area and two on-site intersections would operate at LOS E or F during one or more peak hours with the project under

near-term and/or horizon year conditions. These intersections, their operations, and improvements included as part of the project are as discussed below and summarized in Table 12, *Intersection Improvements Summary*.

- *South Los Posas Road/SR 78 westbound ramp*: this intersection would degrade to LOS E during the weekday AM peak period under near-term and horizon conditions, but the ramp is fully built out within the existing right-of-way (ROW). The intersection is maintained by Caltrans. Caltrans performance standards require improvements when the addition of project traffic extends ramp intersection queues to beyond the available storage. During the weekday AM peak period, off-ramp queues are forecast to exceed the available storage. However, the project does not add vehicles or queue to the westbound off-ramp. As such, no improvements are proposed.
- *South Las Posas Road/Grand Avenue*: this intersection would operate at LOS E or F during the weekday AM and PM peak periods with and without the project under near-term and horizon conditions. While the project would not degrade the LOS, project traffic would exacerbate delays and existing congestion at the intersection. Signal timing adjustments would restore operations to pre-project conditions. The project includes the signal timing modifications of this traffic signal as part of the proposed project.
- *Grand Avenue/Via Vera Cruz/SR 78 eastbound ramp*: this intersection would degrade to LOS E or F during the weekday PM and weekend mid-day peak hours under near-term and horizon conditions. Signal timing adjustments would restore operations to pre-project conditions. The project includes the signal timing modifications of this traffic signal, as well as a contribution to help fund the addition of a separate southbound right-turn lane, as part of the proposed project.
- *Grand Avenue/Linda Vista Drive*: this intersection would degrade to LOS F during the weekday PM peak period under near-term and horizon conditions. The provision of separate northbound left-turn and right-turn lanes would restore operations to pre-project conditions. The project includes re-striping Linda Vista Drive to provide two 10-foot lanes approaching Grand Avenue, as well as contribution to install a traffic signal at this location, as part of the proposed project.
- *West San Marcos Boulevard/Grand Avenue*: this intersection would operate at LOS F during the weekday PM and weekend mid-day peak hours with and without the project under near-term and horizon conditions, but intersection delays would decrease with the project. As such, no improvements are proposed.
- *South Bent Avenue/Northern Costco Driveway*: this on-site intersection would degrade to LOS F during the weekday PM and weekend mid-day peak hours under near-term and horizon conditions. Operations at this stop-controlled intersection are driven by the eastbound left-turn movement of vehicles exiting Costco from this driveway onto South Bent Avenue. Vehicle queues at the eastbound left-turn lane would back up into the Costco site, but there is adequate queue storage to accommodate queues during the weekday PM and weekend mid-day peak hours. In addition, southbound vehicles turning into the site would be contained within the available storage on South Bent Avenue and do not back up on to Grand Avenue or Linda Vista Drive. As such, no improvements are proposed.

- South Bent Avenue/Southern Costco Driveway:** this on-site intersection would degrade to LOS F during the weekday PM and weekend mid-day peak hours under near-term and horizon conditions. Operations at this stop-controlled intersection are driven by the westbound left-turn movement of vehicles exiting a shopping center onto South Bent Avenue. Access to this shopping center is also provided at two driveways along West San Marcos Boulevard. Vehicles making the westbound left-turn to ultimately access the South Bent Avenue intersection with West San Marcos Boulevard may reroute within the shopping center site to access West San Marcos Boulevard directly from another driveway. The project would not add to the critical westbound movement, but it would add to the northbound and southbound through movements, resulting in additional vehicles on South Bent Avenue. Given that westbound drivers exiting the shopping center have other driveway options, travel behaviors at the intersection of South Bent Avenue and the Southern Costco Driveway will likely change according to time of day and traffic gap variations. Additionally, the adjacent traffic signal at South Bent Avenue and West San Marcos Boulevard may create additional gaps in traffic. No improvements are proposed.

Table 12
INTERSECTION IMPROVEMENTS SUMMARY

Intersection	Operations	Improvements (Proposed as Part of the Project)
South Las Posas Road/SR 78 WB Ramp	LOS E during weekday AM peak period (near-term and horizon)	None identified or required
South Las Posas Road/Grand Avenue	LOS E during weekday AM peak and LOS F during weekday PM peak periods (near-term and horizon)	Signal timing modifications
Grand Avenue/Via Vera Cruz/SR 78 EB Ramp	LOS E during weekday AM peak (horizon), LOS F during weekday PM peak (near-term and horizon), LOS E during weekend mid-day peak (near-term and horizon)	Signal timing modifications and fair-share contribution (31.1%) for a dedicated southbound right-turn lane
Grand Avenue/Linda Vista Drive	LOS F during weekday PM and peak period (near-term and horizon)	Re-striping Linda Vista Drive to provide two 10-foot lanes approaching Grand Avenue (one northbound left-turn and one northbound right-turn) and fair-share contribution (10.6%) for a traffic signal
West San Marcos Boulevard/Grand Avenue	LOS F during weekday PM peak (near-term and horizon), LOS E during weekend mid-day peak (near-term), LOS F during weekend mid-day peak (horizon)	None identified or required
South Bent Avenue/Northern Costco Driveway	LOS F during weekday PM peak and weekend mid-day peak periods (near-term and horizon)	None identified or required
South Bent Avenue/Southern Costco Driveway	LOS F during weekday PM peak and weekend mid-day peak periods (near-term and horizon)	None identified or required

WB = westbound; EB = eastbound

As noted in this analysis, some intersections would operate at an LOS that would not meet the LOS D General Plan goal for roadway facility operations. The LTA identifies some potential improvements at certain intersections that would be included as part of the proposed project as identified above and in the Project Description section of this document. Improvements at some intersections, however, are not recommended because the project would not contribute or exacerbate congestion at the intersections, as noted above. The conditions identified in the General Plan Mobility Element that allow for lower LOS at roadway facilities are met by the project in that (1) the location of the project site and surrounding intersections are within the Urban Core, and (2) widening is not feasible at most of these intersections due to the intersections being built out within the existing ROW. Thus, the project would not conflict with the General Plan Mobility Element standards.

Site Access and On-Site Circulation

Access to the proposed fueling station would be provided by three driveways along South Bent Avenue, including one new relocated driveway (north driveway) and two existing driveways (middle and south driveways). With the project, the north and south driveways would operate at LOS F during weekday p.m. and weekend mid-day peak hours. A queue analysis was conducted for the three driveways to determine the potential for vehicle storage queues to extend onto South Bent Avenue. The results of the queue analysis concluded that queues at the three site access driveways are forecasted to be maintained within the available storage lengths during the peak hours. A queue analysis was also conducted for the fuel facility to evaluate the project site's ability to accommodate vehicle queues accessing the fuel pumps. The analysis concluded that maximum estimated vehicle queues would be contained within the available storage of the fuel facility during the peak hours. Thus, vehicle queues would not extend onto South Bent Avenue such as to impede traffic flows.

Transit, Bicycle, and Pedestrian Facilities

Transit service in the project area is provided by the North County Transit District (NCTD), including the following NCTD Breeze bus routes:

- 347: California State University San Marcos to Palomar College along West San Marcos Boulevard
- 445: Carlsbad Poinsettia COASTER Connection to Palomar College along South Las Posas Road
- 645: Palomar College to San Marcos High School along South Las Posas Road

The nearest bus stop is located approximately 1,000 feet to the south near the South Bent Avenue/West San Marcos Boulevard intersection. The NCTD Sprinter light-rail transit corridor is located as close as approximately 0.5 mile to the north, but no stations occur in the immediate project vicinity. The project would not impact existing transit facilities in the project area. It also would not conflict with plans regarding transit service, nor would it impede planned future transit improvements, facilities, or services within the City.

Existing bicycle facilities in the project area include Class II bike lanes (striped and stenciled lane along the roadway) along South Bent Avenue, South Las Posas Road, Via Vera Cruz, and West San Marcos Boulevard. The General Plan Mobility Element identifies future Class II bike lanes in the project area along Linda Vista Drive and Grand Avenue. The project would construct a Class IV bicycle facility along Grand Avenue between Linda Vista Road and South Bent Avenue, which is consistent with the City's

Active Transportation Plan. The project would not impact existing bicycle facilities in the project area or preclude implementation if planned future bicycle facilities on adjacent roadways. Existing pedestrian facilities include sidewalks along most roadways and marked crosswalks at intersections. The project would relocate the existing sidewalk along Grand Avenue between Linda Vista Road and South Bent Avenue (where the new Class IV bicycle facility is proposed) behind a proposed landscaped parkway.

The proposed project would include new curb ramps at the proposed access points on existing sidewalks along the project frontages. These curb ramps would be designed to meet Americans with Disabilities Act (ADA) and other applicable requirements to facilitate pedestrian circulation in accordance with General Plan Mobility Element policies.

Based on the above analysis, the proposed project would not conflict with a program plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. As of the implementation of SB 743 on July 1, 2020, VMT is the appropriate performance measure used in CEQA transportation studies to assess a project's transportation related impacts. As such, the City updated its Transportation Impact Analysis Guidelines in November 2020 to account for VMT assessments. A VMT analysis was conducted for the project based on the City's Transportation Impact Analysis Guidelines to assess potential impacts to regional VMT resulting from the project. Based on the City's guidelines, VMT impacts for retail projects would be significant if the project would result in a net increase in existing total VMT.

The City's Guidelines recommend that total VMT for retail project be assessed using SANDAG's travel demand model, calculating total Citywide VMT with and without the project. As the project's land use is a member-only fuel facility, it is not easily represented in the travel demand model. Thus, an alternative methodology was used in the VMT assessment based on Costco-specific transaction data from nearby Costco fuel facilities in North San Diego County, including the Carlsbad, Carmel Mountain, Vista, and San Marcos (non-Business Center) warehouses. This methodology includes the following components that comprise the change in regional VMT attributed to the project:

- Change in regional VMT associated with existing Costco members shifting their gas trips from other Costco facilities to the new facility.
- Change in regional VMT associated with existing Costco members shifting their gas trips from other non-Costco facilities to the new facility.
- Change in regional VMT associated with Costco members replacing their existing non-Costco gas trips with shared Business Center/gas trips.
- Change in regional VMT associated with employees traveling to and from the new facility.

Costco member project trips included in the VMT analysis are assumed to be existing trips on the network. Due to the nature of gas purchases, members who would purchase fuel at the proposed new facility are already purchasing gas somewhere else. Therefore, the VMT analysis determines the change in regional VMT by calculating the difference between trip lengths associated with traveling to the proposed new facility versus traveling to an existing facility. The analysis considers shifting regional (Costco) trips, shifting local (non-Costco) trips, and employee trips.

Trip Generation

Daily trip generation estimates were developed for the proposed project and the other four existing fuel facilities used in this analysis. The trip generation estimates were developed using a database of trip data and travel characteristics for Costco facilities around the United States, Canada, and Mexico.

Table 13, *Daily Trip Generation Rates for Costco Fuel Facilities in North San Diego County*, summarizes the anticipated trip generation of the proposed project and the four existing facilities.

Table 13
DAILY TRIP GENERATION RATES FOR COSTCO FUEL FACILITIES IN NORTH SAN DIEGO COUNTY

Trip Type	Proposed Facility	Carlsbad	Carmel Mountain	San Marcos	Vista
Internal Trips (Members, Shared Trips)	2,192	2,460	2,335	2,148	1,121
External Trips					
Primary Trips	2,409	1,615	1,751	1,719	1,035
Truck Trips	10	10	10	10	10
Employee Trips	8	8	8	8	8
Member Trips (Gas Only)	2,391	1,597	1,733	1,701	1,017
Diverted Trips (Members, Gas Only)	3,917	2,601	2,821	2,769	1,656
Pass-by Trips (Members, Gas Only)	3,307	2,192	2,377	2,334	1,395
Subtotal External Trips	9,633	6,408	6,949	6,822	4,086
TOTAL	11,825	8,868	9,284	8,970	5,207

Source: Kittelson 2024

Shifting Regional (Costco) Trips

The addition of another Costco fuel facility in the region provides another option for Costco members and results in lower average trip lengths for some members within the existing market areas.

The average trip distances to the four existing Costco facilities and the new facility were calculated without and with the project to determine the extent that primary trip lengths would be reduced by Costco members replacing their existing Costco gas trips with visits to the proposed new facility. The analysis assumed members would visit the facility with the shortest travel time from their homes. The results of this analysis are presented in Table 14, *Average Costco Fuel Facility Trips Lengths*.

Table 14
AVERAGE COSTCO FUEL FACILITY TRIP LENGTHS

Facility	Existing			Future (with Project)		
	Daily Transactions	Total Distance (One-Way)	Average Trip Length (One-Way)	Daily Transactions	Total Distance (One-Way)	Average Trip Length (One-Way)
Carlsbad	864	7,182	8.3	660	5,509	8.3
Carmel Mountain	677	4,982	7.4	654	4,564	7.0
San Marcos	921	7,531	8.2	664	5,960	9.0
Vista	785	5,019	6.4	669	4,079	6.1
Proposed Facility	N/A	N/A	N/A	600	2,248	3.7

Source: Kittelson 2024

N/A = not applicable

As shown in Table 14, average trips lengths for three of the four existing facilities would generally decrease with the addition of the new facility. However, the average trip length for San Marcos would slightly increase because the approximate home locations of members whose trips are expected to shift are also close to the existing San Marcos facility. The trips expected to remain at the existing San Marcos facility are from members who live farther from the project site, thus increasing the average trip distance.

The change in VMT associated with these shifts was determined by calculating the percentage of trips for each existing facility that is expected to shift to the proposed facility. The percentage is applied to the trip generation for each facility and multiplied by the trip length to determine the number of trips expected to shift to the new facility, which is then multiplied by the existing and future trip lengths to determine the change in VMT. The net change in regional VMT associated with these shifts is summarized in Table 15, *Change in VMT Associated with Shifting Costco Primary Gas-Only Member Trips*.

Table 15
CHANGE IN VMT ASSOCIATED WITH SHIFTING COSTCO PRIMARY GAS-ONLY MEMBER TRIPS

Facility	Existing			Percentage of Existing Trips Shifted to the Proposed Facility	Future (with Project)		
	Daily Primary Gas-Only Trips	Average Trip Length (One-Way)	Daily VMT		Daily Primary Gas-Only Trips	Average Trip Length (One-Way)	Daily VMT
Carlsbad	1,597	8.3	13,255	23%	1,230	8.3	10,209
Carmel Mountain	1,733	7.4	12,824	3%	1,681	7.0	11,767
San Marcos	1,701	8.2	13,948	28%	1,225	9.0	11,025
Vista	1,017	6.4	6,509	15%	864	6.1	5,270
Proposed Facility	N/A	N/A	N/A	N/A	1,048	3.7	3,878
TOTAL	6,048	7.6	46,536	N/A	6,048	7.0	42,149
Change in VMT							-4,387

Source: Kittelson 2024

N/A = not applicable

As shown in Table 15, the proposed project is anticipated to reduce the average trip length for regional Costco gas-only primary trips from 7.7 miles to 7.0 miles, which results in an overall decrease in VMT of 4,387 associated with shifting Costco primary trips.

Shifting Local (Non-Costco) Trips

Local non-Costco trip shifts and corresponding changes in regional VMT were evaluated for the following types of trips:

- *Primary gas-only member trips*: trips traveling to the fuel facility for the sole purpose of visiting the fuel facility.
- *Diverted gas-only member trips*: vehicles making an existing trip on the roadway that travel out-of-direction to visit the fuel facility.

- *Pass-by gas-only member trips:* vehicles making an existing trip on the adjacent roadway that stop at the fuel facility and then continue on to their destination.
- *Shared (internal) Business Center/gas member trips:* vehicles traveling to the Business Center to visit both the warehouse and the fuel facility.

The total change in VMT associated with shifting local (non-Costco) trips is shown in Table 16, *Change in VMT Associated with Shifting Local (Non-Costco) Trips*.

Table 16
CHANGE IN VMT ASSOCIATED WITH SHIFTING LOCAL (NON-COSTCO) TRIPS

Trip Type	Existing VMT	Future VMT (with Project)	Change in Regional VMT
Primary Gas-Only	1,880	4,969	+3,089
Diverted Gas-Only	1,371	1,567	+196
Pass-by Gas-Only	0	661	+661
Shared Business Center/Gas	1,124	0	-1,124
TOTAL VMT	4,375	7,197	+2,822

Source: Kittelson 2024

As shown in Table 15, regional VMT associated with shifting local (non-Costco) trips would increase by 2,822 miles with the project.

Employee Trips

The project is expected to require two employees per shift on-site to operate the facility, with two daily shifts for a total of four employees per day. These four employees are expected to make eight daily trips. The VMT associated with these trips is estimated at approximately 116 using an average VMT per employee of 14.5 from SANDAG's San Diego Region SB743 VMT maps.

Total Change in VMT

Based on the analysis above, the total change in regional daily VMT associated with proposed project is estimated to result in an overall net decrease of 1,449 miles, as summarized in Table 17, *Total Change in VMT*, below.

Table 17
TOTAL CHANGE IN VMT

Trip Type	Existing VMT	Future VMT (with Project)	Change in Regional VMT
Regional Trips	46,536	42,149	-4,387
Local Trips	4,375	7,197	+2,822
Employee Trips	0	116	+116
TOTAL VMT	50,911	49,462	-1,449

Source: Kittelson 2024

Because the project would not result in a net increase in VMT within the region, the project is considered to have a less than significant VMT impact. Therefore, the project would not conflict or be

inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Less Than Significant Impact. The project site does not include any design features that would increase traffic hazards. The project is consistent with the on-site and surrounding land use and zoning designations, and implementation of the project would not introduce incompatible uses to the project site. The project has been designed in accordance with applicable standards and design criteria, such as adequate sight distance at project driveways, turning radii at driveways and within the facility, vehicle queue storage within the facility, and ADA-compliant curb ramps to avoid traffic-related hazards. Additionally, a one-way, exit-only egress only for fuel delivery trucks would be provided in the northern portion of the site that would connect to Linda Vista Drive to facilitate traffic circulation. During construction, the proposed project would comply with local regulations regarding traffic controls. Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant.

d) *Would the project result in inadequate emergency access?*

Less Than Significant Impact. Access to the site would be provided via three driveways on South Bent Avenue, along with a one-way, exit-only egress on Linda Vista Drive only for fuel delivery trucks. The driveways would be of standard size to accommodate passenger cars, trucks, and emergency vehicles. As discussed in Item XVII(a), project-related traffic at the driveways and within the fuel facility would not result in queuing that would extend onto adjacent local roads such that it would interfere with emergency response access. The proposed facility also would include internal drive aisles and vehicle queue storage areas that could accommodate emergency vehicle movements within the project site. Project construction may result in segments of South Bent Avenue and/or Linda Vista Drive temporarily being narrowed for through traffic. However, the project would ensure that access for emergency vehicles would be maintained at all times throughout the duration of the construction period. Furthermore, the California Fire Code, along with the SMFD, administers the rules and regulations on fire access design. Final site plans would show fire and emergency responders suitable fire access road dimensions and surfaces (California Fire Code Chapter 5, Sections 503.1 through 503.4) and an adequate number of emergency rated entrances to the facility (California Fire Code Section D104). Final project plans prepared for the proposed project are subject to review and approval by the City and the SMFD. Proposed circulation improvements would be designed in accordance with the City's roadway design standards to ensure proper safety requirements are met. Therefore, the project would not result in inadequate emergency access. Impacts would be less than significant.

XVIII. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

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

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

No Impact. As described under Items V(a) and V(b), twelve historic sites have been documented within one mile of the project site, none of which are documented within the project site. Additionally, the project does not involve demolition of any structures and would, therefore, not cause a substantial adverse change to historical resources. No impact would occur.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant with Mitigation Incorporated. While no archaeological resources were identified on the project site, informal requests for tribal input resulted in responses from the Pechanga Band of Indians, Campo Band of Mission Indians, Rincon Band of Luiseño Indians, San Luis Rey Band of Missions Indians, and San Pasqual Band of Mission Indians that the project is situated in an area of cultural sensitivity. Formal consultation with the City was requested by the Pechanga Band of Indians, Rincon Band of Luiseño Indians, and San Luis Rey Band of Missions Indians. The City initiated government-to-government consultation with these tribes in accordance with AB 52 to identify potential tribal cultural resources that would be affected by the project and potential procedures to reduce the effects of the project on these resources. Consultation is ongoing.

Due to the potential for archaeological discoveries during construction-related ground disturbance, impacts to tribal cultural resources are considered potentially significant. Mitigation measures CUL-1 through CUL-4 identify in Section V, *Cultural Resources*, would require monitoring during ground disturbance and agreements regarding treatment measures to be established prior to construction. Implementation of mitigation measures CUL-1 through CUL-4 would reduce potential impacts to unknown tribal cultural resources to a less than significant level.

XIX. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or

telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The proposed project is located in a developed area with existing infrastructure and utilities. The project includes the construction of a fuel facility at an existing retail use that would require utility connections. The utility connections required to serve the project would occur in conjunction with other on-site improvements analyzed as part of the project throughout this IS.

The VWD would provide water service to the project site via connections in surrounding roadways. Storm water drainage would be accommodated by the provision of an on-site drainage system consisting of roof drains, curb inlets, catch basins, biofiltration systems, and detention basins that would connect to the existing municipal storm drain system. Electrical and telecommunication facilities would be constructed on-site and would connect to existing lines in surrounding utility easements and roadways. The project would not generate wastewater or require natural gas and as such, no associated connections to these utilities are required.

The project proposes a land use consistent with the surrounding development and would not result in additional impacts to local utilities or service systems. The project would not require new or expanded utility infrastructure systems. Therefore, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. The proposed project is located in a developed area with existing water infrastructure. The project does not include restrooms or other indoor uses that would require potable water. Proposed landscaped areas and fire hydrants within the project site, however, would require connections to existing water facilities. Water service to the site would be provided by the VWD. Water is supplied to the VWD by the San Diego County Water Authority (SDCWA) via the California Aqueduct from northern and central California, which is managed by the MWD. A secondary source of imported water is provided by the Colorado River Aqueduct, which is also managed by the MWD. According to VWD's Urban Water Management Plan, which was last updated in 2020, the VWD will continue to rely on imported water from the SDCWA as the main source of supply while attempting to increase the use of recycled water (VWD 2021). The water used within the VWD service area as of 2020 was approximately 4,835 million gallons per year (mgy) and is expected to increase to 8,097 mgy (with 771 mgy being recycled water demand) by the year 2040, an increase of 3,262 mgy. Based on the air quality modeling assumptions in CalEEMod (Appendix A), the proposed project's estimated water demand is 68,594 gallons per year, which is within the anticipated water demand increase for VWD. According to the 2020 Urban Water Management Plan for VWD, there is sufficient supply to accommodate projected water demand under normal and single- and multiple-dry year conditions utilizing imported water. Desalination and recycled water would supplement imported supplies and provide additional supply reliability. Therefore, the proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

- c) *Would the project 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?***

No Impact. The project would not generate wastewater and thus would not require the use of, or affect the capacity of, existing wastewater facilities. The project therefore would not require a determination by the wastewater treatment provider regarding adequate capacity. No impact would occur.

- d) *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

Less Than Significant Impact. Construction and demolition activities would generate solid waste that would be disposed of in a local landfill. The construction contractor would be required to dispose of construction waste through appropriate coordination with landfills in accordance with existing laws and regulations governing the types of waste that are allowed to be disposed of in landfills.

Operation of the proposed project would generate solid waste associated with the proposed use but limited to rubbish disposal by members in designated receptacles. The amount of solid waste generated by the project would be minimal as no other uses besides a fuel facility are proposed. Nonetheless, solid waste generated by the project would be serviced by EDCO, and solid waste would then be transferred to Sycamore Landfill. According to the California Department of Resources Recycling and Recovery (CalRecycle), the landfill has a daily permitted capacity of 5,000 tons per day for solid waste. As of December 2016, the remaining capacity of Sycamore Sanitary Landfill was 148 million cubic yards, or approximately 40 million tons, with an anticipated closure date of 2042. Further, four other landfills in the County accept municipal solid waste, including Borrego Landfill, Miramar Landfill, Otay Landfill, and Ramona Landfill (CalRecycle 2024a).

According to CalRecycle, the City has a disposal rate target of 8.9 pounds per person per day. If the City meets this target, the City is considered in compliance with the 50 percent diversion requirement of AB 939. The most recent data from CalRecycle identifies the City's annual per-capital disposal rate as 5.4 pounds per person per day (CalRecycle 2023). Thus, the City is exceeding their targets for diversion.

The anticipated operational solid waste generation from the proposed project was conservatively estimated using CalRecycle's Estimated Solid Waste Generation Rates (CalRecycle 2024b). It is estimated that the project (15,000-SF canopy) would generate approximately 135 pounds of solid waste per day (0.9 pounds per 100 SF per day). This does not consider any waste diversion through recycling and is within the capacity for the Sycamore Landfill. Therefore, implementation of the proposed project is not expected to generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

- e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

Less Than Significant Impact. The proposed project would be required to comply with applicable federal, state, and local statutes and regulations related to solid waste, diversion of waste, and recycling. Solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, Public Resources Code Sections 44001–44018 and CCR Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.) authorize the County Department of Environmental Health and

Quality, Local Enforcement Agency to issue solid waste facility permits. Sycamore Sanitary Landfill is a permitted facility and EDCO is a licensed hauler. The project would provide rubbish disposal receptacles for customers but would not generate substantial amounts of solid waste as a fuel facility use. Refer to Item XIX(d) above for additional details. By incorporating waste reduction, recycling, and diversion measures, the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

XX. Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

According to CALFIRE, the project site is not located within or near state responsibility areas (CALFIRE 2024). The City's General Plan Safety Element (Figure 6-4) shows the project site is not within a moderate, high, or very high fire hazard severity zone.

a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Less Than Significant Impact. According to the General Plan Safety Element, the San Marcos EOP governs the operations of the City during an emergency. This plan addresses the response to moderate evacuation scenarios, including the identification of evacuation points and general routes (City 2012). The proposed project would be required to abide by the standards set forth in the San Marcos EOP. The project would install new driveways and internal circulation elements consistent with applicable standards and policies related to emergency access. Project implementation is not expected to adversely impact roadways along designated evacuation routes. As required under the California Fire Code, the proposed project would be required to present development plans which afford fire and

emergency responders suitable fire access. SMFD would review the proposed points of entry and driveways during the review of permit applications, which would be required to meet the qualifications for emergency access to and from the project site. SMFD Stations No. 1, 3 (404 Woodland Parkway), and 4 (204 San Elijo Road) are well within the City's time response goal (a three-mile distance, as described in the Safety Element) for first-in fire engine and medic ambulance to the project site. As such, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The project site is located in a developed area of the City and is not located within or adjacent to a very high fire hazard severity zone or State Responsibility Area (SRA). The project would not exacerbate fire risk, as the site is already entirely developed on relatively level topography. The project plans and proposed emergency access would be reviewed and approved by SMFD during the review of building permit applications, and project plans would be required to comply with the California Fire Code. The project, therefore, would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The project site is located in a developed area that is served by existing utilities and roadways. While the project would require the installation of utility connections to existing infrastructure (refer to Section XIX, *Utilities and Service Systems*), these would not exacerbate fire risks, as the project site is not located within or adjacent to a very high fire hazard severity zone or SRA, and these improvements would be constructed within developed areas. The project would not require the installation or maintenance of roads, fuel breaks, emergency water sources, or overhead power lines. Therefore, the project would not exacerbate fire risk associated with these types of improvements. No impact would occur.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. The project is not located in a very high fire hazard severity zone or SRA, and risk of wildfire is considered low within the project area due to the location within a relatively flat and highly urbanized area of the City. In addition, as described further in Section VII, *Geology and Soils*, and X, *Hydrology and Water Quality*, the project site is not in a landslide hazard area, and no substantial flooding or geologic instability are anticipated to occur. Thus, the risk of people and structures experiencing significant risks, such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes is negligible. Impacts would be less than significant.

XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

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

Less Than Significant with Mitigation Incorporated. With the incorporation of mitigation measures identified in this IS, the proposed project would not have the potential to substantially degrade the quality of the environment, reduce the habitat of a sensitive plant or animal species, or eliminate important examples of California history or prehistory.

As discussed in Section IV, *Biological Resources*, the project site is almost entirely developed and does not contain sensitive biological resources. The project site is adjacent to an open space area to the west that contains sensitive habitat, including vernal pools, but the project would not directly impact this area, and indirect impacts would be avoided through drainage controls and fencing.

Project construction has the potential to disturb undiscovered archaeological resources/Tribal Cultural Resources (refer to Section V, *Cultural Resources*, and Section XVIII, *Tribal Cultural Resources*) and paleontological resources (refer to Section VI, *Geology and Soils*) representing California history and prehistory. Therefore, the project includes implementation of mitigation measures CUL-1 through CUL-4 to address potential impacts related to discovery of undiscovered archaeological resources/Tribal Cultural Resources and mitigation measures GEO-1 through GEO-6 to reduce potential impacts to

paleontological resources. With implementation of these mitigation measures, these impacts would be reduced to less than significant levels.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?**

Less Than Significant with Mitigation Incorporated. Cumulative environmental impacts are those impacts that by themselves are not significant, but when considered with impacts occurring from other projects in the vicinity, would result in a cumulative impact. Related projects considered to have the potential of creating cumulative impacts in association with the project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the project. The project is located in a developed area that is largely built out. Other reasonably foreseeable projects in the vicinity include the following:

- *Pacific Commercial*: construction of a 122-room hotel at the northeast corner of Grand Avenue and Pacific Street.
- *MacDonald Group*: 82 apartments and 5,000 SF of commercial space at the former Sears site along San Marcos Boulevard between South Las Posas Road and Via Vera Cruz.
- *Pacific Grand Ventures*: an approximately 262,000-SF industrial park project located east of Pacific Street and north of Grand Avenue.
- *Gran Vista*: 120 multi-family residential units at the northwest corner of the West Mission Road and North Las Posas Road intersection.
- *Arco*: a new nine-pump gas station with a 3,000-SF car wash and a 5,000-SF food mart at the southwest corner of the West Mission Road and North Las Posas Road intersection.
- *Artists Village*: 102 multi-family residential units, seven live/work units, 7,658 SF of office space, and 49,266 SF of retail space at the northwest corner of Linda Vista Road and Grand Avenue.

Implementation of the proposed project would not result in individually limited, but cumulatively considerable significant impacts. As discussed under Item III(b), the project’s long-term emissions of criteria pollutants and precursors would not exceed the SDAPCD daily or annual screening thresholds. Therefore, the project’s operational activities would not result in a cumulatively considerable net increase of criteria pollutants that would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Similarly, the project would have a less than significant impact in relation to GHG (refer to Section VIII, *Greenhouse Gas Emissions*), which is inherently discussed in terms of cumulative impacts. Impacts related to archaeological resources, Tribal Cultural Resources, and paleontological resources were determined to be potentially significant if unknown and unanticipated resources are unearthed during grading activities. With implementation of mitigation measures CUL-1 through CUL-4 and GEO-1 through GEO-6, impacts related to cultural and paleontological resources would be less than significant, and the project would not result in cumulatively considerable impacts. Additionally, project-related VMT impacts were assessed as less than significant and would not result in cumulatively considerable transportation impacts. The project would

also not result in cumulatively considerable construction noise impacts because only one of the cumulative projects is in the general vicinity. The Artists Village project is located within approximately 1,000 feet while the others are located at greater distances. If the construction schedules for the proposed project and this other nearby project happen to overlap, controls would also be required for that project for compliance with applicable construction noise standards.

Cumulative projects, including those identified above, would be required to complete a similar environmental analysis, and incorporate mitigation as necessary to reduce the potential for cumulative impacts. The proposed project, by incorporating the mitigation measures outlined herein, would reduce its contribution to cumulative impacts to be less than cumulatively considerable; therefore, the project would result in individually limited and not cumulatively considerable impacts that would be less than significant impacts with mitigation incorporated.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. As evaluated throughout this IS, potential hazards to human beings would be less than significant. Air pollutant emissions generated during construction and operation would be below thresholds of significance and would not result in substantial adverse effects for sensitive receptors (refer to Section III, *Air Quality*). Geological risks such as earthquakes, liquefaction, and landslides would not be significant with the incorporation of applicable geotechnical recommendations and standard engineering and construction practices into project design (refer to Section VI, *Geology and Soils*). The project would not result in significant impacts related to the use of hazardous materials, as the project would adhere to applicable regulations related to the transportation, use, and disposal of such materials (refer to Section IX, *Hazards and Hazardous Materials*). Noise, both during construction and operation, would not exceed the noise thresholds set forth by the SMMC or considered in this analysis (refer to Section XIII, *Noise*). The project would not substantially affect the transportation network or create new transportation hazards for humans (refer to Section XVII, *Transportation*). Furthermore, the project site is not within a very high fire hazard severity zone, and not at a heightened risk of wildfire. Thus, the project would not directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant.

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