Prepared for:

### City of San Marcos

Development Services Department, Planning Division
I Civic Center Drive
San Marcos, California 92069
Contact: Susan Vandrew Rodriguez, Associate Planner

Prepared by:

**DUDEK** 

605 Third Street Encinitas, California 92024 Contact: Brian Grover, Project Manager

**APRIL 2019** 

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#### 1 INITIAL STUDY CHECKLIST

#### 1. Project title:

Sunrise Specific Plan

#### 2. Lead agency name and address:

City of San Marcos
Development Services Department, Planning Division
1 Civic Center Drive
San Marcos, California 92069

#### 3. Contact person and phone number:

Susan Vandrew Rodriguez, Associate Planner 760.744.1050 ext. 3237

#### 4. Project location:

The approximately 14.4-acre project site is located at the southeastern limits of the City of San Marcos (City) and is comprised of Assessor's Parcel Numbers (APNs) 228-312-09-00 and 228-312-10-00. The project site is currently within portions of two jurisdictions: the City (APN 228-312-09-00, approximately 3.6 acres) and the County of San Diego (APN 228-312-10-00, approximately 10.8 acres); however, the entirety of the project resides within the City's General Plan Sphere of Influence. Please refer to Figure 1 for the project location.

The project site is currently vacant, with areas disturbed from previous agricultural uses. The site is not currently accessible by a public roadway; however, an existing 9-foot wide unimproved road access easement provides site access via E. Barham Drive.

#### 5. Project sponsor's name and address:

The Sunrise Gardens Project Owner, LLC 2235 Encinitas Boulevard #216 Encinitas, California 92024

#### 6. General Plan designation:

The southern parcel of the project site (APN 228-312-10-00) is designated as Semi-Rural Residential (SR-1) by the County of San Diego General Plan which allows for residential development at a maximum density of one dwelling unit per 2, 4, or 8 gross acres (du/ac) (County of San Diego 2011). This parcel is also within the City's General Plan Sphere of Influence (SOI) and is designated as Light Industrial (LI) which allows for light

manufacturing, processing, assembly, wholesale, office, and research and development laboratories, as well as supporting uses, such as office, limited retail, and business services. The northern parcel of the project site (APN 228-312-09-00) is designated as Low Density Residential (LDR) which allows for a density of 4.1 to 8.0 du/ac and a mixture of single-family and duplex residential development, including detached condominiums, clustered homes, courtyard housing, and residential manufactured home parks.

#### 7. Zoning:

The County of San Diego has zoned the southern parcel of the project site (APN 228-312-10-00) as Single Family Residential (RS). The City's existing zoning for the northern parcel of the project site (APN 228-312-09-00) is Residential Manufactured Home Park (R-MHP).

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

The proposed project would involve entitlement processing of an Annexation, General Plan Amendment, Prezone, Rezone, Multi-Family Site Development Plan, Specific Plan, Tentative Map, Grading Variance, and Conditional Use Permit. If approved, these entitlements would allow the development of a planned residential community within the project site. The Specific Plan is a comprehensive planning document that establishes development guidelines for the project site. The document will serve as the primary land use, policy, and regulatory document for the project by providing a development planning review process, as authorized by California Government Code §65450, in conjunction with the City of San Marcos Zoning Ordinance, Chapter 20.535. The permitted uses within the proposed project site consist of multi-family residential, circulation and storm water infrastructure, and open space/active recreation.

The proposed project would allow for the development of approximately 192 multi-family residential dwelling units, resulting in a gross density of approximately 13.3 dwelling units per acre. The proposed residential units would be comprised of 100 two-story townhomes and 92 three-story townhomes. The proposed project also includes 6.2 acres of open space, including active recreational areas such as a pool area, recreational facilities, tot lots, and barbeque stations; approximately 0.3 acres of bio-retention areas; private internal circulation improvements, such as internal driveways, alleys, and connections to East Barham Drive and Meyers Avenue; and a public services and facilities plan, included as part of the Specific Plan in order to provide a safe, healthy, and well-rounded community The project site plan is shown on Figure 2.

The proposed project would require several off-site improvements including storm drainage facilities, roadway network construction, and sewer improvements. Access to the project site would occur from Meyers Avenue and E. Barham Drive, providing primary and secondary gated ingress/egress points, respectively. The primary access to the site from Meyers Avenue will be provided off-site within the City of Escondido via a private road access easement through a vacant parcel to the east; refer also to Table 1, Required Actions and Approvals – Other Public Agencies.

Construction of the proposed project is estimated to commence in March 2020 and would last approximately 21 months, ending in December 2021. Construction would require the use of typical construction equipment, including dozers, tractors, excavators, graders, pavers, rollers, and air compressors. In addition, due to underlying geology, construction would require blasting and the use of a rock crusher for materials processing. A grading variance would be required for several slopes within the project site which exceed 20 feet in height. Approval of a grading variance would allow for grading of two main pads separated approximately on a north-south centerline of the project site. It should be noted that this proposed grading variance has been previously granted on similar projects in the area and is consistent with developments with similar soils and topography.

The specific requested project entitlements/discretionary actions by the City include a General Plan Amendment, Prezone, Rezone, Multi-Family Site Development Plan, Specific Plan, Tentative Map, Grading Variance, and Conditional Use Permit as detailed below:

- General Plan Amendment A General Plan Amendment is required to re-designate the southern parcel of the project site (APN 228-312-10-00) from Semi-Rural Residential (SR-1) (as currently designated by the County of San Diego) and Light Industrial (LI) (as designated by the City, as the parcel is within its Sphere of Influence) to Specific Plan Area (SPA). Additionally, a General Plan Amendment (GPA) is required to re-designate the northern parcel of the project site (APN 228-312-09-00) from Low Density Residential (LDR) to Specific Plan Area (SPA). This General Plan Amendment would allow the Specific Plan to provide regulations for development of the project site.
- Rezone A rezone is required to re-designate the southern parcel of the project site (APN 228-312-10-00) from Single Family Residential (RS) (as currently zoned by the County of San Diego) to Specific Plan Area (SPA). Additionally, a rezone is required to change the northern parcel of the project site (APN 228-312-09-00) from Residential Manufactured Home Park (R-MHP) to Specific Plan Area (SPA). This Rezone would allow the Specific Plan to provide regulations for development of the project site.

- Specific Plan A Specific Plan is required to be reviewed and approved concurrently with the Site Development Plan application. The Specific Plan establishes the development regulations of all land uses within the project site. Upon adoption of the Specific Plan by the City, all development within the project site must conform to the regulations of the Specific Plan.
- Multi-Family Site Development Plan to address the design of 192 multi-family residential units, associated common open space and residential amenities, and the plotting of floor plans and elevations within the project site.
- Tentative Map to create 192 for-sale condominium units.
- Conditional Use Permit to allow for blasting and the temporary use of a rock crusher during grading operations.
- Grading Variance would be required for several slopes within the project site which exceed 20 feet in height (wall/slope combination up to 36 feet).

In addition to above, Annexation of Assessor Parcel Number APN 228-312-10-00 from the County to the City will require approval by the San Diego Local Agency Formation Commission in accordance with State law.

### 9. Surrounding land uses and setting:

The project site is immediately bordered by low density residential manufactured homes to the north and west. To the east and south of the project site is a light industrial business park with a variety of businesses located within the City of Escondido. An existing vacant lot is located within the City of Escondido (zoned as Planned Development – Industrial) adjacent the proposed project site access driveways, east/northeast of the project site. The proposed driveway providing project site access from Meyers Avenue is located off-site within the City of Escondido. To the southwest, within the County of San Diego are semi-rural residential lands with associated agricultural and equestrian uses. E. Barham Drive and State Route 78 (SR-78) are located just north of the project site, and Meyers Avenue is to the east.

The North County Transit District (NCTD) operates the Nordahl Road Sprinter and Breeze transit station located approximately 0.3 mile from the E. Barham Drive entrance and approximately 0.4 mile from the Meyers Avenue entrance.

# 10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Additional approvals from other public agencies may include but are not limited to approval of a site-specific Stormwater Pollution Prevention Plan (SWPPP) and

approvals from neighboring jurisdictions. Additional permits and approvals from responsible and other agencies are also listed in Table 1.

Table 1
Required Actions and Approvals – Other Public Agencies

Agency -	Required Action/Approval			
San Diego Local Agency Formation Commission	Approval and other related actions for the annexation of APN 228-312-10-00 into the City from unincorporated County of San Diego lands.			
	Approval and other related actions for the annexation of APN 228-312-10-00 into the Vallecitos Water District.			
City of Escondido	Encroachment Permit – An Encroachment Permit(s) would be required for Private Driveway "B" and utility improvements on Meyers Avenue and E, Barham Drive.			
	Utility Improvement Plan for water, sewer, water quality, drainage, dry utilities, gates, signage, lighting, and road repairs.			
	Grading Plan			
	Landscaping Plan			
Vallecitos Water District	Annexation of APN 228-312-10-00 into the Vallecitos Water District.			
San Diego Regional Water Quality Control Board	National Pollutant Discharge Elimination System Construction General Permit (State Water Resources Control Board Order 2009-09-DWQ)			

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, has consultation begun? Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The City has notified the tribes in accordance with Public Resources Code section 21074. To date, tribal consultation has been initiated with the San Luis Band of Mission Indians. Tribal consultation input will be considered throughout the environmental document preparation process.

#### **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," as indicated by the checklist on the following pages.

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

<b>DETERMINATION:</b> (To be completed by the Lead Agency)	
On the basis of this initial evaluation:	
☐ I find that the proposed project COULD NOT have a significant and a NEGATIVE DECLARATION will be prepared.	effect on the environment,
I find that although the proposed project could have a significant there will not be a significant effect in this case because revision made by or agreed to by the project proponent. A MITIGATED NEO will be prepared.	s in the project have been
☑ I find that the proposed project MAY have a significant effect of ENVIRONMENTAL IMPACT REPORT is required.	n the environment, and an
I find that the proposed project MAY have a "potentially significated" significant unless mitigated" impact on the environment, but at less adequately analyzed in an earlier document pursuant to applicable I been addressed by mitigation measures based on the earlier analysis sheets. An ENVIRONMENTAL IMPACT REPORT is required, by effects that remain to be addressed.	ast one effect (1) has been egal standards, and (2) has is as described on attached
☐ I find that although the proposed project could have a significant of because all potentially significant effects (a) have been analyzed ENVIRONMENTAL IMPACT REPORT or NEGATIVE DEC applicable standards, and (b) have been avoided or mitigated ENVIRONMENTAL IMPACT REPORT or NEGATIVE DE revisions or mitigation measures that are imposed upon the propos is required.	d adequately in an earlier LARATION pursuant to pursuant to that earlier CLARATION, including
Mandrew P	March 28, 2019
Signature	Date

#### **EVALUATION OF ENVIRONMENTAL IMPACTS:**

- 1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources 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 will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "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 Environmental Impact Report (EIR) is required.
- 4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5. 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. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state 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 Measures Incorporated," describe 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.

- 6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9. The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No impact
1.	AESTHETICS – Except as provided in Public Reso	urces Code Section	on 21099, would the	i	
<u>a)</u>	Have a substantial adverse effect on a scenic vista?		Щ		
b)	Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			$\boxtimes$	
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?				$\boxtimes$
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			$\boxtimes$	

#### 1.1 Aesthetics

Public Resources Code (PRC) Section 21099(d)(1) states "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit

priority area shall not be considered significant impact on the environment." A "transit priority area" is defined as "an area within one-half mile of a major transit stop that is existing or planned".

PRC Section 21099 provided the additional definitions:

- Infill site: "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75% of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses."
- Transit priority area: "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."

The state CEQA Guidelines provide the following additional definitions:

- Urbanized area: Section 15387 of the CEQA Guidelines states that an urbanized area means a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile.
- Qualified urban use: Section 15191(k) of the CEQA Guidelines (see also PRC Section 21072), defines qualified urban use as any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.
- Major transit stop: Section 15191(i) of the CEQA Guidelines (see also PRC Section 21064.3) defines a major transit stop as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

The project site is located less than one-half mile from the Nordahl Road Sprinter Light Rail station, and any existing rail transit station is considered to be a major transit stop per CEQA Section 21064.3. As such, the project is located within a "transit priority area." Further, the project site is located on a vacant lot and more than 75% of the project boundary is adjacent to "qualified urban uses" (i.e., residential and commercial) per CEQA Section 21072, and thus qualifies as an "infill site." As such, based upon the above definitions, the proposed project would be considered a residential project on an infill site within a transit priority area per PRC 21099. Therefore, per PRC Section 21099, aesthetic impacts shall not be considered significant. However, aesthetics will be discussed in the EIR.

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

Less Than Significant Impact. The City's General Plan does not identify any designated scenic vistas; however, the General Plan 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. The project site and surrounding valley terrain are encompassed by mountains to the west and south that provide opportunities for elevated vantage points offering long and broad views, which may include views of the project site. Per PRC Section 21099, impacts related to scenic vistas would be less than significant. However, this topic will be discussed and analyzed in the EIR.

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

**No Impact.** The project site is not located adjacent to, or in the vicinity of, a designated state scenic highway (Caltrans 2011). Therefore, the project would not substantially damage scenic resources including, but not limited to, trees rock outcroppings, and historic building within a state scenic highway. No impact would occur.

c) Would the project, 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?

Less Than Significant Impact. As described above, the project site is located in an urbanized area. The project site does not have any existing zoning related to scenic quality, such as a scenic overlay zone. The project is a Specific Plan which would include development standards and regulations governing the visual character and aesthetics of future development of the project site. Per PRC Section 21099, impacts related to scenic quality would be less than significant. However, this topic will be discussed and analyzed in the EIR.

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

Less Than Significant Impact. The project would introduce new sources of lighting to the undeveloped project site. Per PRC Section 21099, the project site would be would be considered a residential project on an infill site located within a "transit priority area", As such, impacts related to lighting and glare would be less than significant. However, this topic will be discussed and analyzed in the EIR.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>II.</b>	AGRICULTURE AND FORESTRY RESOURCES—significant environmental effects, lead agencies man Assessment Model (1997) prepared by the California assessing impacts on agriculture and farmland. In care significant environmental effects, lead agencies Forestry and Fire Protection regarding the state's in Project and the Forest Legacy Assessment project; Protocols adopted by the California Air Resources II	y refer to the Califo ia Department of Caletermining whether may refer to infortiventory of forest land and forest carbon	ornia Agricultural La Conservation as an o er impacts to forest i mation compiled by and, including the Fo measurement meth	nd Evaluation and optional model to unescurces, including the California Deporest and Range A	Site use in use timberland, artment of assessment
а)	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?				

# 1.2 Agriculture and Forestry Resources

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.** Dudek conducted a California Land Evaluation and Site Assessment (LESA) analysis for the project site due to previous agricultural use (Dudek 2018). The LESA analysis concluded that the project site does not contain significant agricultural resources. The LESA analysis will be included in the EIR. Additionally, the project site is designated

as "Urban and Built-Up Land" and "Other Land" by the Farmland Mapping and Monitoring Program (Department of Conservation 2018). No impact would occur.

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

**No Impact.** The project site is not zoned for agricultural use or designated as land under the Williamson Act. 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. The project site is not zoned for forest land or timberland production. No impact would occur.

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

**No Impact.** As previously described, the proposed project site is not zoned for forest land, and therefore would not result in the loss or conversion of forest land. 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?

Less Than Significant Impact. Designated farmland exists within the vicinity of the project site. However, the proposed project, similar to other surrounding development, would not result in substantial changes that could result in the conversion of farmland to non-agricultural use. This topic will be discussed in the EIR.

			Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact	
III.	III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
a)	Conflict with or obstruct implementation of the applicable air quality plan?	$\boxtimes$				

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

### 1.3 Air Quality

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

Potentially Significant Impact. San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plans for attainment and maintenance of the ambient air quality standards in the basin—specifically, the State Implementation Plan (SIP) and RAQS. The County's Guidelines for Determining Significance and Report and Format and Content Requirements - Air Quality discusses conformance with the RAQS (County of San Diego 2007). The guidance indicates that, if the project, in conjunction with other projects, contributes to growth projections that would not exceed SANDAG's growth projections for the City, the project would not be in conflict with the RAQS (County of San Diego 2007). If a project includes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the SIP and RAOS and may contribute to a potentially significant cumulative impact on air quality. A General Plan Amendment is necessary to rezone Assessor's Parcel Number (APN) 228-312-10 within the County from Single Family Residential (RS-1) to the Sunrise Specific Plan (SP), and APN 228-312-09 in the City from Residential Manufactured Home Park (R-MHP) to SP. As such, because the proposed project could result in a conflict with the SIP and RAQS, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

For the purpose of this discussion, the relevant federal air quality plan is the Ozone Maintenance Plan (SDAPCD 2012). The RAQS is the applicable plan for purposes of State air quality planning. Both plans reflect growth projections in the basin.

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?

Potentially Significant Impact. Construction of the proposed project would generate air pollutant emissions from dust, off-road equipment, vehicle emissions, rock crushing, blasting, architectural coatings, and asphalt pavement application. Following the completion of construction activities, the project would generate VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from mobile sources, including vehicular traffic generated by residents of the project; area sources, including the use of landscaping equipment and consumer products; and from architectural coatings. As such, air quality emissions associated with both construction and operation of the project could be potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** Sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. As such, because the proposed project could expose sensitive receptors to substantial pollutant concentrations, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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. Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the proposed project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered less than significant.

Land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project would not engage in any of these activities. Moreover, typical odors generated from operation of the proposed project would primarily include vehicle exhaust generated by residents, as well as through the periodic use of landscaping or maintenance equipment. Therefore, impacts

would be considered less than significant. However, this topic will be further discussed and analyzed in the EIR.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	BIOLOGICAL RESOURCES – 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 Game or U.S. Fish and Wildlife Service?				
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	⊠			
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?	Ø			
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?				

# 1.4 Biological Resources

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 Game or U.S. Fish and Wildlife Service?

**Potentially Significant Impact.** A biological survey of the project site was conducted and six vegetation communities/land covers were mapped within the Project site. These include

wild oats grassland, California buckwheat scrub (including Disturbed), black sage scrub, white sage scrub, agricultural (orchard), and ornamental. Native vegetation communities within the Project site include 4.52 acres of black sage scrub, 0.38 acres of California buckwheat scrub, 1.55 acres of disturbed California buckwheat scrub, and 0.07 acres of white sage scrub, which is a total of 6.52 acres of coastal sage scrub and its subcategories of habitat. Further, one coastal California gnatcatcher individual and one special-status reptile, Belding's orange-throated whiptail were observed during the focused surveys completed in 2018. Along with these 2 species, five other species have moderate to high potential to occur within the Project site. As such, impacts to special-status species are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

**Potentially Significant Impact.** As discussed above, sensitive vegetation communities are present on site. As such, the proposed project could result in disturbance of these communities. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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?

**Potentially Significant Impact.** Jurisdictional waters could be present within the project site or surrounding area. As such, because the potential for wetland or non-wetland water features were present in the area is unknown at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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?

**Potentially Significant Impact.** Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. The proposed project is undeveloped but surrounded by development on all sides, limiting the effectiveness of the site as a wildlife movement corridor. Nonetheless, because the project site provides some suitable habitat for wildlife species, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** A few trees are present thorough the site and would be removed with implementation of the proposed project. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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?

Potentially Significant Impact. The project would be required to conform to the goals and policies in the City of San Marcos General Plan, North County Multiple Species Conservation Plan (MSCP), and any approved Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) subarea plan, related to the protection of biological resources. Because the project site provides some sensitive vegetation communities and suitable habitat for wildlife species, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

	CULTURAL RESOURCES – Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No impact
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?	$\boxtimes$			

### 1.5 Cultural Resources

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064?

**Potentially Significant Impact.** Because the presence of historical resources on site is not known at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** Because the presence of archeological resources on site is not known at this time, and because the proposed project could result in disturbance of unidentified archeological resources, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** Because the proposed project could result in disturbance of unidentified human remains, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

VI.	ENERGY – Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Result in 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?	$\boxtimes$			

# 1.6 Energy

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

Potentially Significant Impact. During construction, the proposed project would utilize temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers and heating, ventilation, and air conditioning), and petroleum for construction equipment. During operations, the proposed project would generate electricity for operation of residences, natural gas primarily for heating of homes, and petroleum use for movement of vehicles. Due to increased consumption of energy on-site, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** Due to increased consumption of energy on-site, the project could conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII.	GEOLOGY AND SOILS - 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.				
	ii) Strong seismic ground shaking?	$\boxtimes$			
	iii) Seismic-related ground failure, including liquefaction?				
	iv) Landslides?				
b)	Result in substantial soil erosion or the loss of topsoil?	$\boxtimes$			
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 onor 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 waste water disposal systems where sewers are not available for the disposal of waste water?				⊠
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	$\boxtimes$			

### 1.7 Geology and Soils

- 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. Geotechnical evaluations have been prepared for the proposed project and will be included in the EIR. The project site is not located within an Alquist-Priolo Earthquake Fault Zone. However, because the proposed project would be located in tectonically active southern California, impacts would be potentially significant. This topic will be discussed and analyzed in the EIR.

#### ii) Strong seismic ground shaking?

**Potentially Significant Impact.** Because the proposed project would be located in tectonically active southern California, the project would be required to comply with the California Building Code. Additional recommendations for seismic safety may also be required. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

### iii) Seismic-related ground failure, including liquefaction?

**Potentially Significant Impact.** Because potential for seismic-related ground failure, including liquefaction are not know at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

#### iv) Landslides?

**Potentially Significant Impact.** The project site and surrounding area are slightly to moderately sloping. Because potential for landslides are not know at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** A grading variance would be required for several slopes within the project site which exceed 20 feet in height. All slopes, including proposed cut and fill slopes, are susceptible to surficial slope failure or erosion. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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?

**Potentially Significant Impact.** Because the project site could consist of unstable soils, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** Because the soils at project site are not know at this time, mpacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed project does not include the use of septic tanks. No impact would occur.

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

**Potentially Significant Impact.** Because the soils at project site and thus the potential to unearth paleontological resources, are not know at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No impact
<b>⊢</b> . −	GREENHOUSE GAS EMISSIONS – Would the pro	ject:	Γ		
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?				

### 1.8 Greenhouse Gas Emissions

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

Potentially Significant Impact. The City has adopted a Climate Action Plan (CAP), which was developed to help reduce the City's GHG emissions. Generally, this is achieved by demonstrating consistency with the permitted land use; however, the project would not be consistent with the existing land use and zoning as inventoried in the CAP. Projects that do not comply with the land use designation at the time the CAP was developed are generally considered inconsistent with the CAP. However, if buildout of the proposed land use can be demonstrated to result in fewer emissions than buildout of the existing land use designated in the General Plan, the project would be consistent with the CAP. Nonetheless, because the project is inconsistent with the land use designation of the site, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** Under the City's CEQA Thresholds, the method for determining significance for project-level environmental documents is through the CAP Consistency Worksheet (City of San Marcos 2013b). The EIR will assess the project's consistency with the CAP. Until then, impacts are considered potentially significant.

X.	HAZARDS AND HAZARDOUS MATERIALS – Wo	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No impact
d)	Be located on a site that 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?				

#### 1.9 Hazards and Hazardous Materials

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

**Potentially Significant Impact.** Construction and operations of the proposed project would entail transport, use, or disposal of potentially hazardous materials that are routinely used for construction and for household uses. However, some trash and debris, including one concrete and asphalt rubble pile, trash debris piles, and a groundwater supply well are present on site. Because these existing materials could be hazardous and transport, use, or disposal of these existing materials could result in a hazard to the public or the environment, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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?

**Potentially Significant Impact.** As discussed above, trash and debris, including one concrete and asphalt rubble pile, trash debris piles, and a groundwater supply well are present on site. Because these existing materials could be hazardous and could potentially

result in a foreseeable upset and accident conditions, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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?

**No Impact.** The proposed project is not located within one-quarter mile of an existing or proposal school. No impact would occur.

d) Would the project be located on a site that 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?

**Potentially Significant Impact.** A database search report which documents various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials, chemical handlers, and/or polluters would be performed at the site. The results of the database search will be will be discussed and analyzed in the EIR. Impacts are considered potentially significant.

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

Less Than Significant Impact. The public airport closest to the project site is the McClellan-Palomar Airport, located approximately 8.5 miles west. However, the project site is located within Review Area 2 of the airport influence area (AIA), according to the Airport Land Use Compatibility Plan (ALUCP) (San Diego County Regional Airport Authority 2011). Limits on the heights of structures are the only restrictions on land uses within Review Area 2. The project site is not located in an area of high terrain or in an area of Terrain Penetration to Airspace Surfaces. Further, all buildings would not exceed 40 feet in height. This topic will be further discussed in the EIR.

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

Less Than Significant Impact. An Evacuation Plan has been prepared for the proposed project and will be incorporated into the EIR. According to the General Plan Safety Element, the San Marcos Emergency Operations Plan (EOP) governs the operations of the City during a disaster. This plan addresses response to moderate evacuation scenarios,

including the identification of evacuation points and general routes (City of San Marcos 2013a). Based on the existing road network, the community can evacuate to the north, east, south and west within a short distance, depending on the nature of the emergency. Impacts are expected to be less than significant; however, this topic will be discussed and analyzed in the EIR.

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. The project site is not designated as a high fire severity zone (Ready San Diego 2018). An Evacuation Plan was prepared for the proposed project in case of a wildland fire. The project would be constructed in accordance with the California Fire Code and the San Marcos Fire Department, which require a design that affords fire and emergency responders suitable fire access roads dimensions and surfaces. Thus, impacts are considered less than significant.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X.	HYDROLOGY AND WATER QUALITY - Would the	e 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:				
	<ul> <li>result in substantial erosion or siltation on- or off-site;</li> </ul>	$\boxtimes$			
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;				
	iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
	iv) impede or redirect flood flows?				

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

# 1.10 Hydrology and Water Quality

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. Construction activities associated with the proposed project could result in wind and water erosion of the disturbed area leading to sediment discharges. Additionally, fuels, oils, lubricants, and other hazardous substances used during construction could be released and impact water quality. The proposed project is required to comply with the National Pollution Discharge Elimination System (NPDES) State Water Resources Control Board Construction General Permit Order No. 2009-0009-DWQ for stormwater discharges and general construction activities, and incorporate standard Best Management Practices (BMPs) such as regular cleaning or sweeping of construction areas and impervious areas, and various stormwater BMPs such as filtration media screens. In compliance with the Construction General Permit, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that specifies BMPS that would be implemented during construction to minimize impacts to water quality. Therefore, impacts are expected to be less than significant. This topic will be further discussed and analyzed in the EIR.

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?

**Potentially Significant Impact.** The project does not propose the use of groundwater resources. However, the project would result in increased stormwater runoff which could potentially interfere with groundwater recharge. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

- c) Would the project 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:
  - i) Would result in substantial erosion or siltation on- or off-site;

**Potentially Significant Impact.** The proposed project would increase the area of impervious surface on the project site, which could increase runoff flow rates or volumes, which could result in erosion or siltation on- or off-site. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

**Potentially Significant Impact.** As discussed above, the proposed project would increase the area of impervious surface on the project site, which could increase runoff flow rates or volumes, which could result in flooding on- or off-site. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

**Potentially Significant Impact.** As discussed above, because the proposed project would increase the area of impervious surface on the project site, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

iv) Impede or redirect flood flows?

**Potentially Significant Impact.** As discussed above, because the proposed project would increase the area of impervious surface on the project site, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

d) Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. Per the Federal Emergency Management Agency's (FEMA's) Flood Insurance Rate Map Number 06073C0794G, the project site is not located within a 100-year flood hazard area (FEMA 2012). The project site is approximately 11 miles inland from the Pacific Ocean and would not be subject to inundation by tsunami. Given that the project site is not located near a large standing body of water, inundation by seiche (or

standing wave) is considered negligible. The project site is generally flat with no steep slopes and does not contain slopes subject to mudflows. No impact would occur.

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

**Potentially Significant Impact.** The project site is located within the Carlsbad Management Area Water Water Quality Improvement Plan (WQIP). Wetlands could be present within the project site or surrounding area. As such, because the potential for wetland or non-wetland water features were present in the area is unknown at this time, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Χ.	<b>LAND USE AND PLANNING</b> – Would the project:				
a)	Physically divide an established community?	· 🗆			$\square$
b)	Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				

# 1.11 Land Use and Planning

a) Would the project physically divide an established community?

**No Impact.** The proposed project would not construct structures that have the potential to physically divide an established community (such as large roadways, walls/fences, etc.). The site currently has no public access and no existing roadways, trails, or other means of travel exist through the project site. Therefore, the proposed project would not result in the physical division of an established community. No impact would occur.

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

**Potentially Significant Impact**. The proposed project would require approval and adoption of the GPA by City Council, rezoning of the site, and approval of an annexation of the southern parcel into the City. The proposed project's consistency with applicable plans and

policies, including San Marcos General Plan, the City of San Marcos zoning ordinance, the McClellan-Palomar Airport Land Use Compatibility Plan, and 2050 Regional Transportation Plan/Sustainable Communities Strategy, will be discussed and analyzed in the EIR. Because the proposed project would be inconsistent with the land use designation of the project site, and because the project could result in potentially significant environmental impacts, impacts are considered potentially significant.

XII	MINERAL RESOURCES – Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				$\boxtimes$

#### 1.12 Mineral Resources

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. According to the City of San Marcos General Plan Conservation & Open Space Element, the City has land classified in all four Mineral Resource Zones (MRZ) (City of San Marcos 2013a). California does not require that local governments protect land designated as MRZ-1, MRZ-3, or MRZ-4. However, the City is responsible for recognizing lands designated as MRZ-2 and protecting these areas from premature development incompatible with mining. The lands designated as MRZ-2 include small portions between Double Peak, Mt. Whitney, and Franks Peak; and small portions in the northern Sphere of Influence within Twin Oaks Valley Neighborhood. These locations do not overlap with the proposed project site; therefore, no loss of known mineral resources would occur. 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. The proposed project site is not designated as a locally important mineral resource recovery site on any local general plan, specific plan, or other land use plan (City

of San Marcos 2013a). Due to the location and the nature of the proposed project, there would be no impact to mineral resources.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII.	NOISE – 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?	$\boxtimes$			
с)	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?			$\boxtimes$	

#### 1.13 Noise

a) Would the project result in 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?

**Potentially Significant Impact.** Construction of the proposed project would result in use of equipment, rock crushing activities, and vehicle trips that would generate noise in the area. During operations, the proposed project would generate noise through introduction of additional traffic on site, and an increase on stationary source noise, such as increased human presence on-site. Sensitive receptors, including residences, are located near the project site. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

b) Would the project result generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the proposed project would require blasting and rock crushing activities, which could result in generation of excessive

groundborne vibration or noise levels. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

c) Would the project be 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 proposed project is not located within the vicinity of a private airstrip. The public airport closest to the project site is the McClellan-Palomar Airport, located approximately 8.5 miles west. According to the ALUCP for the McClellan-Palomar Airport, the project site is not located within the existing or future 60 dB CNEL noise contour of the airport (San Diego County Regional Airport Authority 2011). Therefore, people residing or working in the project area would not be exposed to substantial airport noise. This topic will be discussed further in the EIR.

XIV	. POPULATION AND HOUSING – Would the projec	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

### 1.14 Population and Housing

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)?

Potentially Significant Impact. The proposed project would directly induce growth through the development of approximately 192 multi-family residential dwelling units, resulting in a gross density of approximately 13.3 dwelling units per acre. Based on the population rate coefficient of 3.14 persons per dwelling unit, as established by the California Department of Finance, the proposed project would directly induce population growth to the area and would potentially add an estimated 603 people to the area (DOF

2018). Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**No Impact.** There is no existing housing or people on the proposed project site; therefore, the proposed project would not displace any housing. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
Would the project result in substantial governmental facilities, need for new control of the substantial subs	or physically altered governme	ntal facilities, the co	nstruction of which	could cause
significant environmental impacts, in o objectives for any of the public service	order to maintain acceptable se es:	ervice ratios, respons	se times, or other p	performance
significant environmental impacts, in o objectives for any of the public service Fire protection?	order to maintain acceptable se es:	ervice ratios, respons	se times, or other p	performance
objectives for any of the public service	order to maintain acceptable se	ervice ratios, respons	se times, or other p	performance
objectives for any of the public service Fire protection?	es:	ervice ratios, respons	se times, or other p	performance
objectives for any of the public service Fire protection? Police protection?	es: 🔲 🖂	ervice ratios, respons	se times, or other p	performance

#### 1.15 Public Services

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:

#### Fire protection?

**Potentially Significant Impact.** The proposed project would increase the demand on San Marcos Fire Department resources as a result of the development of residential uses and the associated population increase. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

#### Police protection?

**Potentially Significant Impact.** The project would introduce approximately 603 residents on-site, resulting in an increased demand on existing police protection resources. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

#### Schools?

**Potentially Significant Impact.** The proposed project would introduce 603 residents to the site, some of which are expected to be students. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

#### Parks?

**Potentially Significant Impact.** Buildout of the proposed project is estimated to add an additional 603 residents to the City, which would result in increased demand for parks. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

#### Other public facilities?

**Potentially Significant Impact.** Development of the project would result in an additional 603 residents to the City. This would increase the demands on library services and resources. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No limpact
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?	$\boxtimes$			
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?				

#### 1.16 Recreation

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

**Potentially Significant Impact.** Buildout of the proposed project is estimated to add an additional 603 residents to the City. This increase in residents would increase demands for neighborhood and regional parks and other recreational facilities. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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?

**Potentially Significant Impact.** Impacts associated with construction of the proposed project's public and private open space are considered within the overall development footprint for the proposed project. Impacts of the overall development would be analyzed in the EIR. As such, impacts from construction of recreational facilities are considered potentially significant. This topic will be discussed and analyzed in the EIR.

XVI	I.TRANSPORTATION– Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
а)	Conflict with 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)(1)??				
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?			$\boxtimes$	

### 1.17 Transportation

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

**Potentially Significant Impact**. Construction of the proposed project would require approximately 78,800 cubic yards of cut and fill to be balanced on site, which would result in trips to and from the site. During operations, the proposed project would generate traffic to the existing roadway network. Project-generated traffic would also result in vehicle miles traveled (VMT) and will therefore need to be analyzed for consistency with State and local guidance. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?

**Potentially Significant Impact.** Implementation of the proposed project would generate traffic to the existing roadway network. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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. All roadways, including off-site improvements, constructed in association with the proposed project would be subject to existing City design standards and safety specifications for roadways. This topic will be further discussed and analyzed in the EIR.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. The California Fire Code, along with the San Marcos Fire Department, administers the rules and regulations on fire access design. The proposed project must present a design which affords fire and emergency responders suitable fire access roads dimensions and surfaces (Chapter 5, § 503.1 through 503.4 of the California Fire Code), an adequate number of emergency rated entrances to the community (Appendix D, §D106 of the California Fire Code), and entryway gate access for first responders (Chapter 5 of the California Fire Code, §503.6). Two points of entry have been identified for the project site and are designed to meet the design requirements codified in the California Fire Code. Both project site entrances meet the qualifications for emergency access to for the project site. Therefore, with implementation of procedures outlined in the

Evacuation Plan and compliance with the California Fire Code and San Marcos Fire Department requirements, the proposed project would not result in inadequate emergency access. Impacts would be less than significant. However, this topic will be discussed and analyzed in the EIR.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li>TRIBAL CULTURAL RESOURCES</li> <li>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, de Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically terms of the size and scope of the landscape, sacred place, or object with cultural value to a California I tribe, and that is:</li> </ul>				t is geographically o	defined in
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?				

#### 1.18 Tribal Cultural Resources

- 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)?

**Potentially Significant Impact.** The City has notified the tribes in accordance with Public Resources Code section 21074. To date, tribal consultation has been initiated

with the San Luis Band of Mission Indians. Tribal consultation input will be considered throughout the environmental document preparation process. However, as consultation with tribes is still ongoing, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

**Potentially Significant Impact.** As discussed above, the City has notified the tribes in accordance with Public Resources Code section 21074. As consultation with tribes is still ongoing, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No impact
XIX.	UTILITIES AND SERVICE SYSTEMS - Would the	project:			
(a)	Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?	⊠			
b)	Have sufficient water supplies available to serve the project from existing entitlements and resources, 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?				

### 1.19 Utilities and Service Systems

a) Would the project require or result in the relocation or construction of new or expanded water, or wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact. The proposed project would include development of 192 residential units. As such, the proposed project would increase the intensity of uses on the project site, resulting in increased use of water, wastewater treatment, electric power, natural gas, and telecommunication systems. Further, the proposed project would result in an increase of impervious areas. If not carefully planned for, increased runoff from impervious surface can cause alterations to drainage courses. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

b) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, and reasonably foreseeable future development during normal, dry and multiple dry years or are new or expanded entitlements needed?

**Potentially Significant Impact.** As discussed above, the proposed project would increase the intensity of uses on the project site, resulting in increased water use. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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?

**Potentially Significant Impact.** As discussed above, the proposed project would result in increased wastewater generation. Thus, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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?

**Potentially Significant Impact.** Construction of the proposed project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, and plastics. Operation of the proposed project would result in an increase in intensity of uses on the project site, which would likely be associated with increased generation of solid waste. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** As discussed above, the proposed project would result in the generation of solid waste during construction and operations. As such, impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

XX.	WILDFIRE – If located in or near state responsibility would the project:	Potentially Significant Impact y areas or lands cl	Less Than Significant Impact With Mitigation Incorporated assified as very high	Less Than Significant Impact In fire hazard sever	No impact ity zones,
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?				

#### 1.20 Wildfire

The project site is location in and near state responsibility areas (SRA) and near lands classified as "very high" fire hazards severity zones (CAL FIRE 2007 and 2009). The southern parcel of the project site is currently located within an SRA with a "moderate" fire hazard severity designation (CAL FIRE 2007). The northern parcel of the project site is located within a local responsibility area (LRA) with a "moderate" fire hazard severity designation (CAL FIRE 2009). Lands in the vicinity (west, east, and south) in both the SRA and LRA are designated with a "very high" fire hazard severity zone (CAL FIRE 2007 and 2009). However, these areas are separated from the project site by existing residential and commercial development (to the west, east, and south), as well as areas of "moderate" and "high" fire hazard severity zones. Therefore, due to the existing surrounding development, it is expected that the project would result less than significant impacts related to wildfire. However, this topic will be discussed and analyzed in the EIR.

- a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?
  - Less Than Significant Impact. Refer to Section 1.9, Hazards and Hazardous Materials. Impacts would be less than significant; however, this topic will be discussed in the EIR.
- b) Would the project, 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?
  - Less Than Significant Impact. For reasons described above, the project is expected to have a less than significant impact related to wildfire. However, this topic will be discussed in the EIR.
- 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?
  - Less Than Significant Impact. For reasons described above, the project is expected to have a less than significant impact related to wildfire. However, this topic will be discussed in the EIR.
- 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.** For reasons described above, the project is expected to have a less than significant impact related to wildfire. However, this topic will be discussed in the EIR.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
	MANDATORY FINDINGS OF SIGNIFICANCE	<u> </u>	<u>-</u>		
(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 considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	⊠			
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				

### 1.21 Mandatory Findings of Significance

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?

**Potentially Significant Impact.** As discussed in Section 1.4, Biological Resources, the proposed project has the potential to impact sensitive vegetation communities and habitat for special-status wildlife. Further, as discussed in Section 1.5, the proposed project could result in potentially significant impacts to cultural resources. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

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

**Potentially Significant Impact.** As evaluated throughout this document, the proposed project could result in impacts to Aesthetics, Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gases, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Impacts are considered potentially significant. This topic will be discussed and analyzed in the EIR.

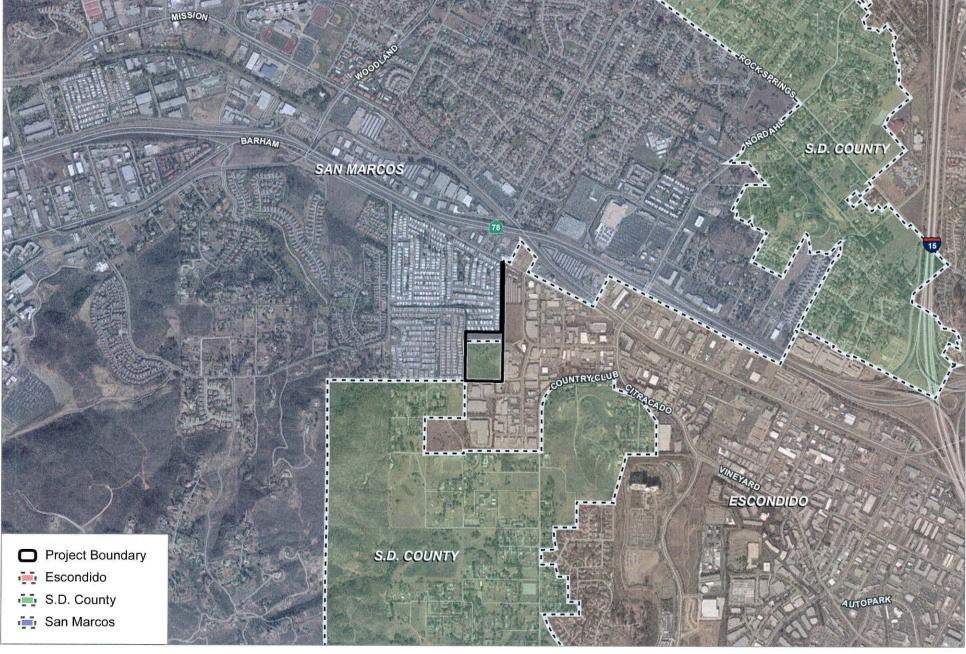
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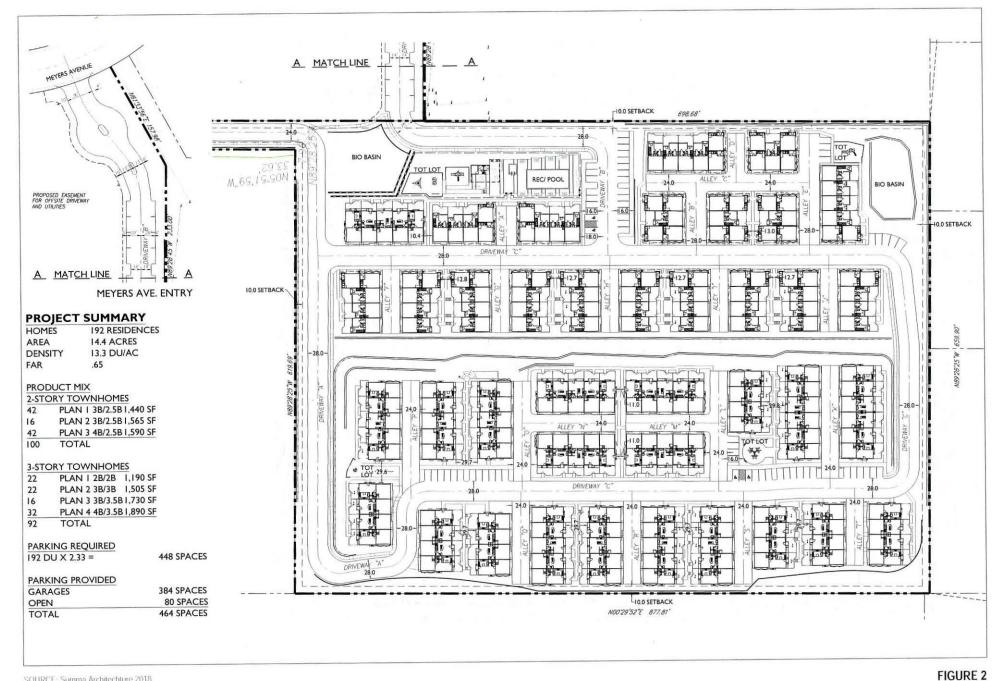


SOURCE: ESRI 2018

**DUDEK** 6 0 500 1,000 Feet

FIGURE 1
Project Site and Surroundings

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SOURCE: Summa Architechture 2018

Conceptual Site Plan

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