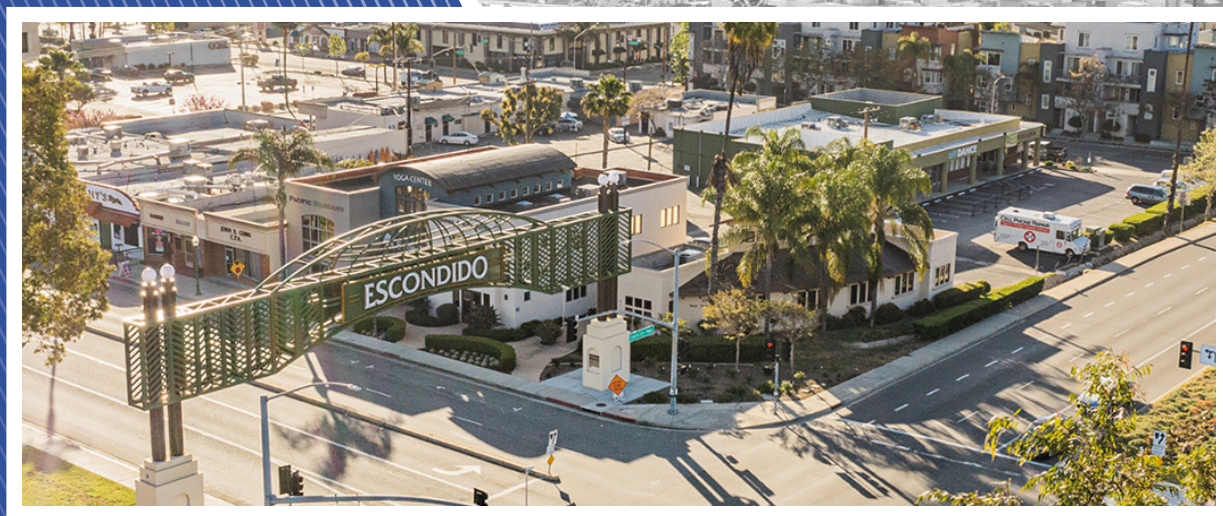
INITIAL STUDY/PROPOSED NEGATIVE DECLARATION

City of Escondido Vehicle Miles Traveled Exchange Program



Prepared for:

City of Escondido

October 2022

INITIAL STUDY/PROPOSED NEGATIVE DECLARATION

City of Escondido Vehicle Miles Traveled Exchange Program

Prepared for:

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October 2022

PROPOSED NEGATIVE DECLARATION

PROJECT: CITY OF ESCONDIDO VEHICLE MILES TRAVELED EXCHANGE PROGRAM

LEAD AGENCY: CITY OF ESCONDIDO

Under the California Environmental Quality Act (CEQA), the lead agency is the public agency with primary responsibility over approval of the project. The City of Escondido (City) is the CEQA lead agency because it is responsible for adoption and implementation of the proposed Vehicle Miles Traveled Exchange Program.

PROJECT DESCRIPTION SUMMARY

The proposed program is a Vehicle Miles Traveled (VMT) Exchange Program (program) – a voluntary program in which discretionary development applicants can participate to reduce the amount of VMT generated by their projects. The program will also provide applicants with the option to reduce potentially significant VMT impacts identified through the CEQA review process by constructing specified VMT-reducing projects that have been identified by the City. Initially, the program will provide applicants with the option to implement early action exchange program projects, which include pedestrian network, bicycle network, and transit supportive improvements that are located within existing developed rights of way. In the future, the types of projects included in the program may be expanded, for example to include trip reduction marketing or an intra-city shuttle, but these future project options would not be included in the initial program.

If the program is adopted, any VMT-reducing projects that an applicant voluntarily elects to implement would be adopted as mitigation measures in the CEQA environmental review document for the applicable project. The program would require that VMT-reducing projects be completed by the applicant before the impact from the development project occurs. Ongoing monitoring and tracking of the implementation of VMT-reducing projects would be included in the City's annual Climate Action Plan implementation status report.

FINDINGS

An Initial Study has been prepared to assess the project's potential effects on the environment and the significance of those effects. Based on the Initial Study, the City has determined that the project would not have any significant effects on the environment. Therefore, no mitigation measures are proposed.

Pursuant to Section 21082.1 of the California Environmental Quality Act, the City has independently reviewed and analyzed the Initial Study and Negative Declaration for the project and finds that the Initial Study and Negative Declaration reflects the independent judgment of the City.

I hereby approve this project:

_____

Ivan Flores, Associate Planner
City of Escondido
(to be signed upon approval of the project after the public review period is complete)

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TABLE OF CONTENTS

Figures

Tables

LIST OF ABBREVIATIONS

AB	Assembly Bill
Basin Plan	Water Quality Control Plan for the San Diego Basin
BMP	best management practice
CAA	federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalGreen	California Green Building Standards Code
CAP	climate action plan
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
City	City of Escondido
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon-dioxide-equivalent
	County of San Diego 2007
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CWMP	construction waste management plan
dB	decibels
diesel PM	diesel particulate matter
DOC	California Department of Conservation
DWR	California Department of Water Resources
EAP	Energy Action Plan
EFD	City of Escondido Fire Department
EMC	City of Escondido Municipal Code

EO	Executive Order
EPA	U.S. Environmental Protection Agency
EPD	Escondido Police Department
EUHSD	Escondido Union High School District
EUSD	Escondido Union School District
EWWD	City of Escondido Water and Wastewater Division
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Monitoring and Mapping Program
General Plan EIR	2012 *Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Environmental Impact Report*
GHG	greenhouse gas
GSP	groundwater sustainability plan
HA	hydrologic area
HU	hydrologic unit
I-15	Interstate 15
IS/proposed ND	Initial Study/Proposed Negative Declaration
lbs/day	pounds per day
LED	light emitting diodes
LOS	level of service
MHCP	Multiple Habitat Conservation Program
MLD	most likely descendant
MRZ	mineral resource zone
MWD	Municipal Water District
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCTD	North County Transit District
NO_2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System

OPR	Governor's Office of Planning and Research
PM_{10}	Respirable particulate matter
$PM_{2.5}$	Fine particulate matter
PPV	peak particle velocity
PRC	Public Resources Code
program	Vehicle Miles Traveled Exchange Program
RAQS	*2016 Revision of the Regional Air Quality Strategy for San Diego County*
RMS	root-mean-square
RWQCB	regional water quality control board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDG&E	San Diego Gas & Electric
SLT	screening level threshold
SO_2	sulfur dioxide
SR 78	State Route 78
SWPPP	storm water pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
VdB	vibration decibels
VMT	vehicle miles traveled
VOC	volatile organic compounds
VWD	Vallecitos Water District

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1 INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

This Initial Study/Proposed Negative Declaration (IS/proposed ND) has been prepared by the City of Escondido to evaluate potential environmental effects resulting from Vehicle Miles Traveled (VMT) Exchange Program (program). Section 2 "Project Description" presents the detailed program information.

This document has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.). An initial study is prepared by a lead agency to determine if a project may have a significant effect on the environment (State CEQA Guidelines Section 15063[a]), and thus to determine the appropriate environmental document. In accordance with State CEQA Guidelines Section 15070, a "public agency shall prepare…a proposed negative declaration or mitigated negative declaration…when: (a) The Initial Study shows that there is no substantial evidence…that the project may have a significant impact on the environment, or (b) The Initial Study identifies potentially significant effects but revisions to the project plans or proposal are agreed to by the applicant and such revisions would reduce potentially significant effects to a less-than-significant level." In this circumstance, the lead agency prepares a written statement describing its reasons for concluding that the project would not have a significant effect on the environment and, therefore, does not require the preparation of an Environmental Impact Report (EIR). By contrast, an EIR is required when the project may have a significant environmental impact that cannot clearly be reduced to a less-than-significant effect by adoption of mitigation or by revisions in the project design.

1.2 WHY THIS DOCUMENT?

As described in the environmental checklist (Chapter 3), the program would not result in any significant environmental impacts. Therefore, an IS/proposed ND is the appropriate document for compliance with the requirements of CEQA. This IS/proposed ND conforms to these requirements and to the content requirements of State CEQA Guidelines Section 15071.

Under CEQA, the lead agency is the public agency with primary responsibility over approval of the project. The City of Escondido is the CEQA lead agency because they are responsible for adopting and implementing the program, which is the "project" evaluated in this IS/proposed ND. The purpose of this document is to present to decision-makers and the public information about the environmental consequences of implementing the program. This disclosure document is being made available to the public for review and comment. This IS/proposed ND will be available for a 20-day public review period from October 27, 2022 to November 16, 2022.

Supporting documentation referenced in this document is available for review at:

City of Escondido
City Hall, First Floor
201 North Broadway
Escondido, CA 92025

Comments should be addressed to:

Ivan Flores
City of Escondido
City Hall, First Floor
201 North Broadway
Escondido, CA 92025

E-mail comments should be addressed to:

Ivan Flores
iflores@escondido.org

If you have questions regarding the IS/proposed ND, please call Ivan Flores at: (760) 839-4529. If you wish to send written comments (including via e-mail), they must be postmarked by November 16, 2022.

After comments are received from the public and reviewing agencies, the City may (1) adopt the ND and adopt the program; (2) undertake additional environmental studies; or (3) abandon the program.

1.3 SUMMARY OF FINDINGS

Chapter 3 of this document contains the analysis and discussion of potential environmental impacts of the program using the sample initial study checklist questions provided in Appendix G to the State CEQA Guidelines. The evaluation demonstrates that the program would have either no impacts or less-than-significant impacts for all of the environmental topics evaluated, which are as follows:

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

1.4 DOCUMENT ORGANIZATION

This IS/proposed ND is organized as follows:

Chapter 1: Introduction. This chapter provides an introduction to the environmental review process. It describes the purpose and organization of this document as well as presents a summary of findings.

Chapter 2: Project Description and Background. This chapter presents an overview and background of the program, provides a detailed description of the program, and identifies program objectives.

Chapter 3: Environmental Checklist. This chapter analyzes the potential environmental impacts of the program using the sample initial study checklist questions provided in Appendix G to the State CEQA Guidelines.

Chapter 4: References. This chapter lists the references used in preparation of this IS/proposed ND.

Chapter 5: List of Preparers. This chapter identifies report preparers.

2 PROJECT DESCRIPTION

2.1 VMT EXCHANGE PROGRAM OVERVIEW

The City of Escondido (City) proposes to adopt a Vehicle Miles Traveled (VMT) Exchange Program (program) – a voluntary program in which discretionary development applicants can participate to reduce the amount of VMT generated by their individual development projects. This program is the "project" evaluated in this IS/proposed ND.

The program would provide applicants with the option to reduce potentially significant VMT impacts identified through the California Environmental Quality Act (CEQA) review process if they agree to construct specified VMT-reducing projects that have been identified by the City. The program would provide applicants with the option to implement early action exchange program projects, which include pedestrian network, bicycle network, and transit supportive improvements that are located within existing developed rights-of-way in the city. In the future, the types of projects included in the program may be expanded, for example to include trip reduction marketing or an intra-city shuttle, but these future project options would not be included in the initial program.

If the program is adopted, any VMT-reducing projects that an applicant voluntarily elects to implement would be adopted as mitigation measures in the CEQA environmental review document for the applicable project. The program would require that VMT-reducing projects be completed by the applicant before the impact from the development project occurs. Ongoing monitoring and tracking of the implementation of VMT-reducing projects would be included in the City's annual climate action plan (CAP) implementation status report.

This chapter presents a description of the program, including the types of VMT-reducing projects that could be implemented if the program is adopted. Chapter 3, Environmental Checklist, evaluates the potential environmental effects that would occur if the VMT-reducing projects included in the program are implemented.

2.2 BACKGROUND

Traditionally, Level of Service (LOS) has been used as the primary transportation analysis metric under the California Environmental Quality Act (CEQA). However, in 2013 the Legislature passed legislation that ultimately eliminated LOS in most instances as a basis for environmental analysis under CEQA. Senate Bill (SB) 743, which was signed into law in 2013, required the Governor's Office of Planning and Research (OPR) to develop a new State CEQA guideline to address transportation metrics under CEQA; thus, changing how lead agencies evaluate transportation impacts under CEQA.

Enacted as part of Senate Bill 743 (2013), Public Resources Code (PRC) Section 21099, subdivision (b)(1), directed OPR to prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed CEQA Guidelines addressing "criteria for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Subdivision (b)(2) of PRC Section 21099 further provides that "[u]pon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to [CEQA], except in locations specifically identified in the guidelines, if any."

On December 28, 2018, the California Resources Agency certified and adopted updates to the CEQA Guidelines which included the adoption of California Code of Regulations (CCR) Section 15064.3, "Determining the Significance of Transportation Impacts." Pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion were eliminated as the basis for determining significant impacts, effectively being replaced with VMT as the primary metric to identify transportation related impacts under CEQA. This fundamental shift to the manner in which transportation impacts are considered under CEQA has led to the need for the development and application of new VMT-based mitigation strategies and options.

Various strategies are available to mitigate transportation impacts from VMT-inducing projects. Direct mitigation strategies are generally applied either directly at the project site in the form of a Transportation Demand Management (TDM) plan and/or on-site improvements (e.g., bicycle, pedestrian, and transit facility improvements). TDM strategies are methods of reducing VMT by changing travel behavior, and commonly include commute reduction programs such as carpooling, vanpools, and telecommuting options; subsidized transit passes; parking cash-out programs; reductions in on-site parking spaces; on-site bike racks and showers; and providing school bus services. These direct mitigation strategies are generally most effective in areas with higher land use density, a greater diversity of land uses, and where multiple travel modes are available (e.g., walking, bicycling, and taking public transit). Although on-site multi-modal improvements are commonly used to mitigate VMT impacts, the most effective manner to mitigate VMT through the provision of multi-modal facilities is via comprehensive network improvements that would more than likely be located outside of the project site and within the public right-of-way. Therefore, using multi-modal facilities to mitigate VMT related impacts is best done at the programmatic level. Common program-based approaches include:

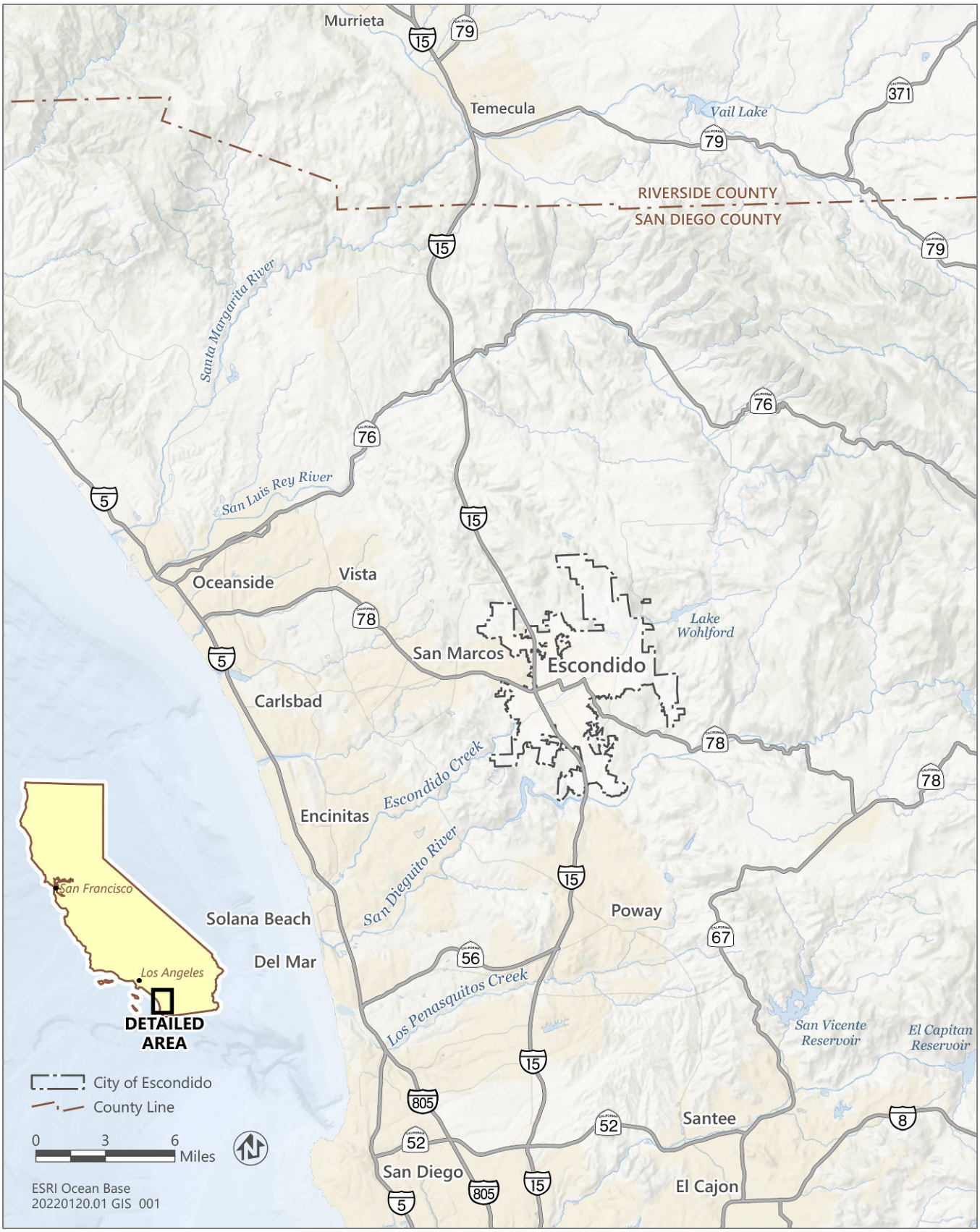
- VMT Impact Fee Programs: This type of program allows a developer to pay a VMT impact fee that goes toward funding a capital improvement program, consisting largely of transit, bicycle, and pedestrian projects.
- VMT Exchange Programs: This type of program allows a developer to offset transportation impacts from a VMT-generating project by implementing an off-site VMT-reducing project.
- VMT Mitigation Banks: This type of program allows a developer to purchase VMT reduction credits that can be applied to fund local, regional, or state-level VMT reduction projects or actions.

The City determined that a VMT exchange program would best fit the needs of Escondido. The City commissioned a technical report, entitled *City of Escondido VMT Exchange Program Documentation* (Fehr & Peers 2022), which provides justification for creating the VMT exchange program, identifies the projects that would be available under the VMT exchange program, and quantifies the VMT reduction that each project would achieve. The technical report identifies early action and future VMT-reducing projects that would be included as part of the City's overall VMT exchange program. The early action VMT-reducing projects, which would include bicycle, pedestrian, and transit supportive infrastructure and capital improvement projects, are the subject of this IS/proposed ND. In the future, the City may expand the types of VMT-reducing projects included in the program, for example to include trip reduction marketing or an intra-city shuttle, but these future project options would not be included in the initial program. Because these future VMT-reducing projects are not currently proposed for inclusion in the program, they are not reasonably foreseeable, and therefore are not evaluated as part of this IS/proposed ND.

2.3 PROGRAM LOCATION

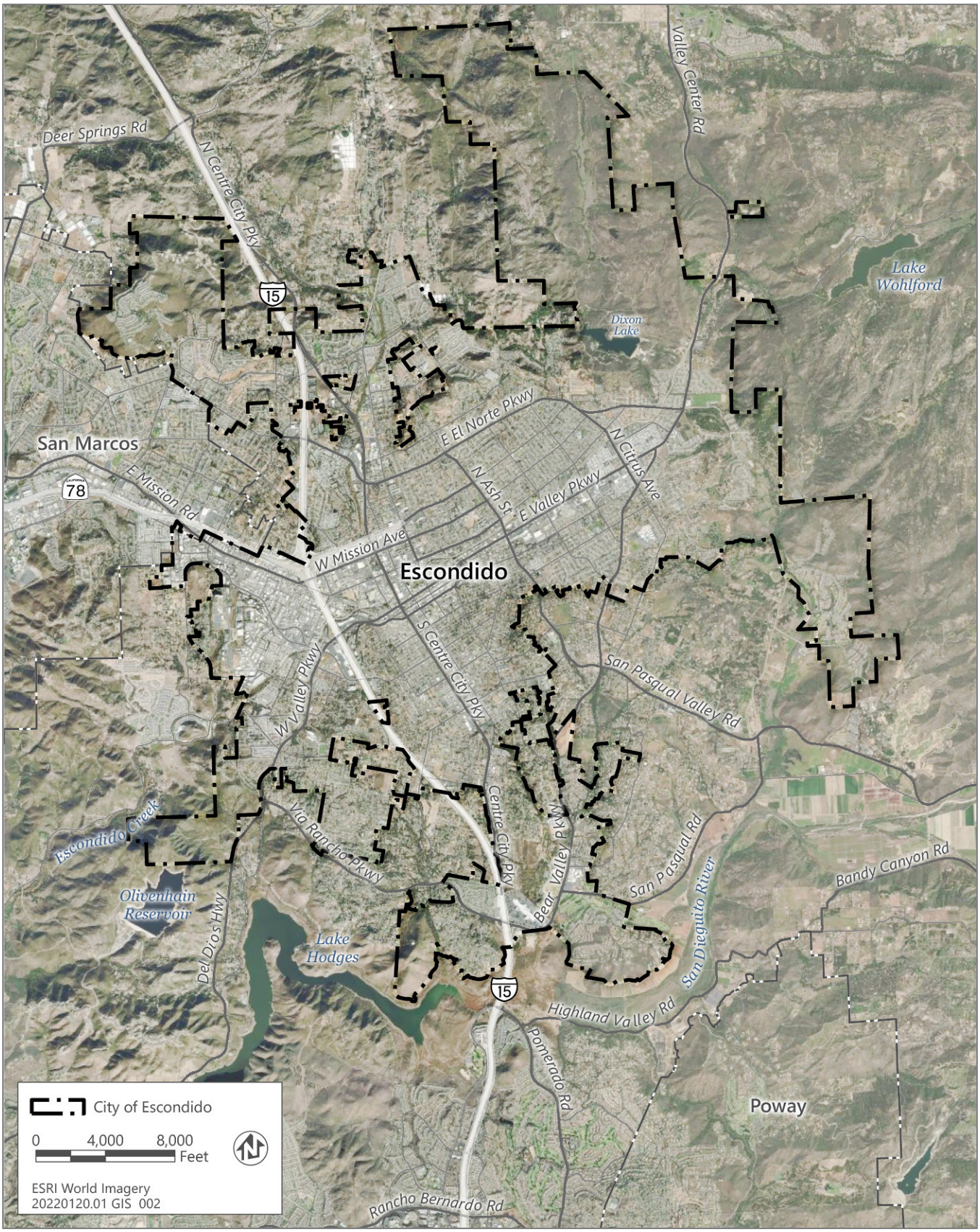
As shown in Figure 2-1, the City of Escondido is located in northern San Diego County, approximately 30 miles north of Downtown San Diego and 18 miles east of the Pacific Ocean. The city includes approximately 37.5 square miles within the incorporated boundary, and approximately 68 square miles within the city's Sphere of Influence. Escondido is bounded on the north by the unincorporated communities of Valley Center and Hidden Meadows, on the west by the City of San Marcos, on the south by Lake Hodges and the City of San Diego, and on the east by unincorporated San Diego County. Interstate 15 bisects Escondido in a north-south direction and State Route 78 transitions from freeway to surface streets in an east-west direction through the community.

The program area encompasses incorporated areas within Escondido's city limits, as shown in Figure 2-2. All early action VMT-reducing projects in the program area would be located within developed roadway rights-of-way in the city. Table 2-1 identifies the specific locations of early action VMT-reducing projects that could be selected. The locations of early action sidewalk projects are shown in Figure 2-3 and potential future bicycle facility projects are shown in Figure 2-4. Additional potential future sidewalk and bicycle facility projects will be located within City streets and will be identified in the City's future Comprehensive Active Transportation Strategy Applicants may choose a VMT-reducing project from Table 2-1. Alternatively, applicants may propose similar VMT-reducing projects at other locations throughout Escondido. These applicant-proposed locations must be reviewed by City Development Services staff and must meet specific criteria to demonstrate that comparable VMT reductions would be achieved. The criteria for applicant-proposed locations are described in more detail in Section 2.4, "Description of the Proposed Program."



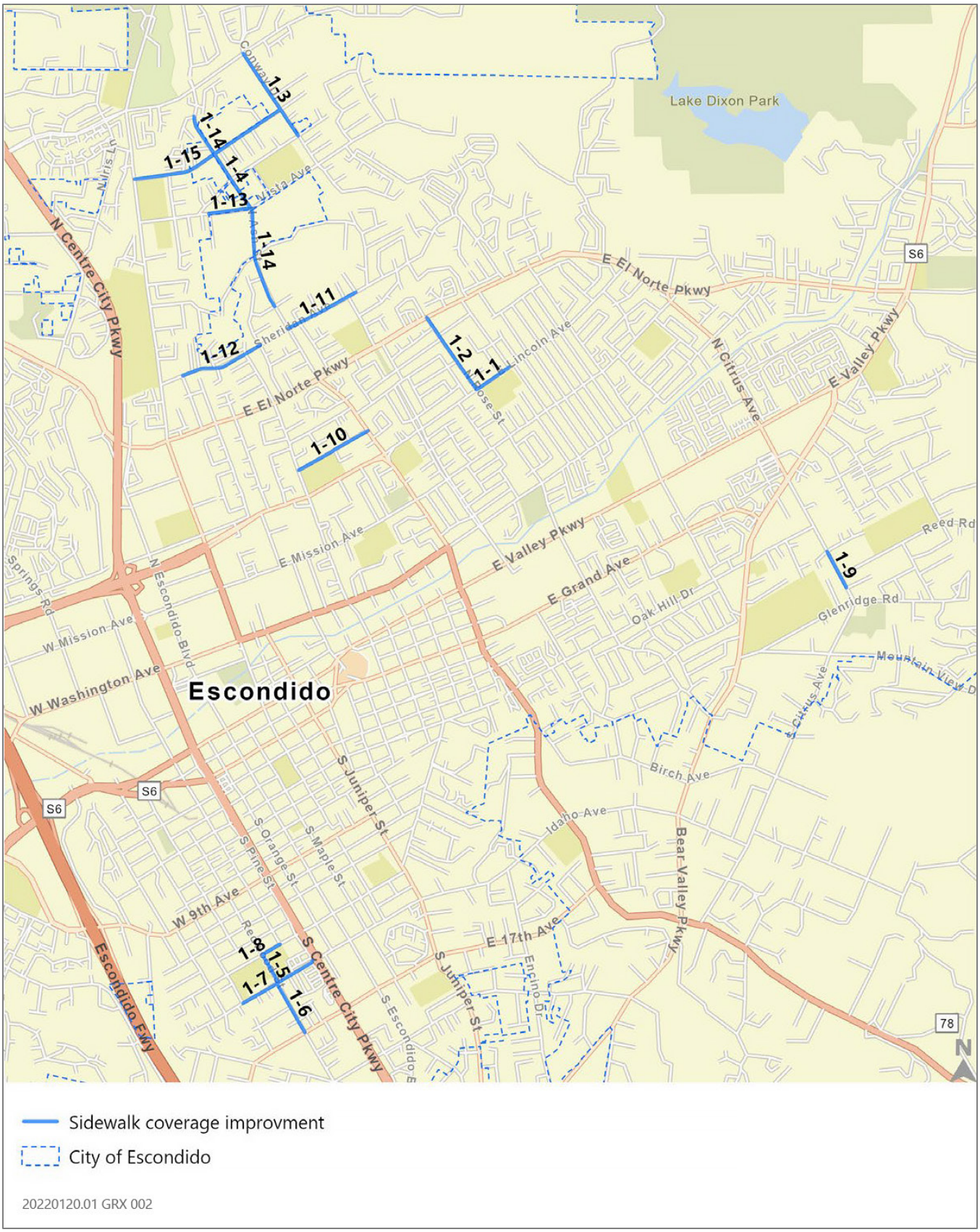
Source: image adapted by Ascent Environmental in 2022.

Figure 2-1 Regional Location



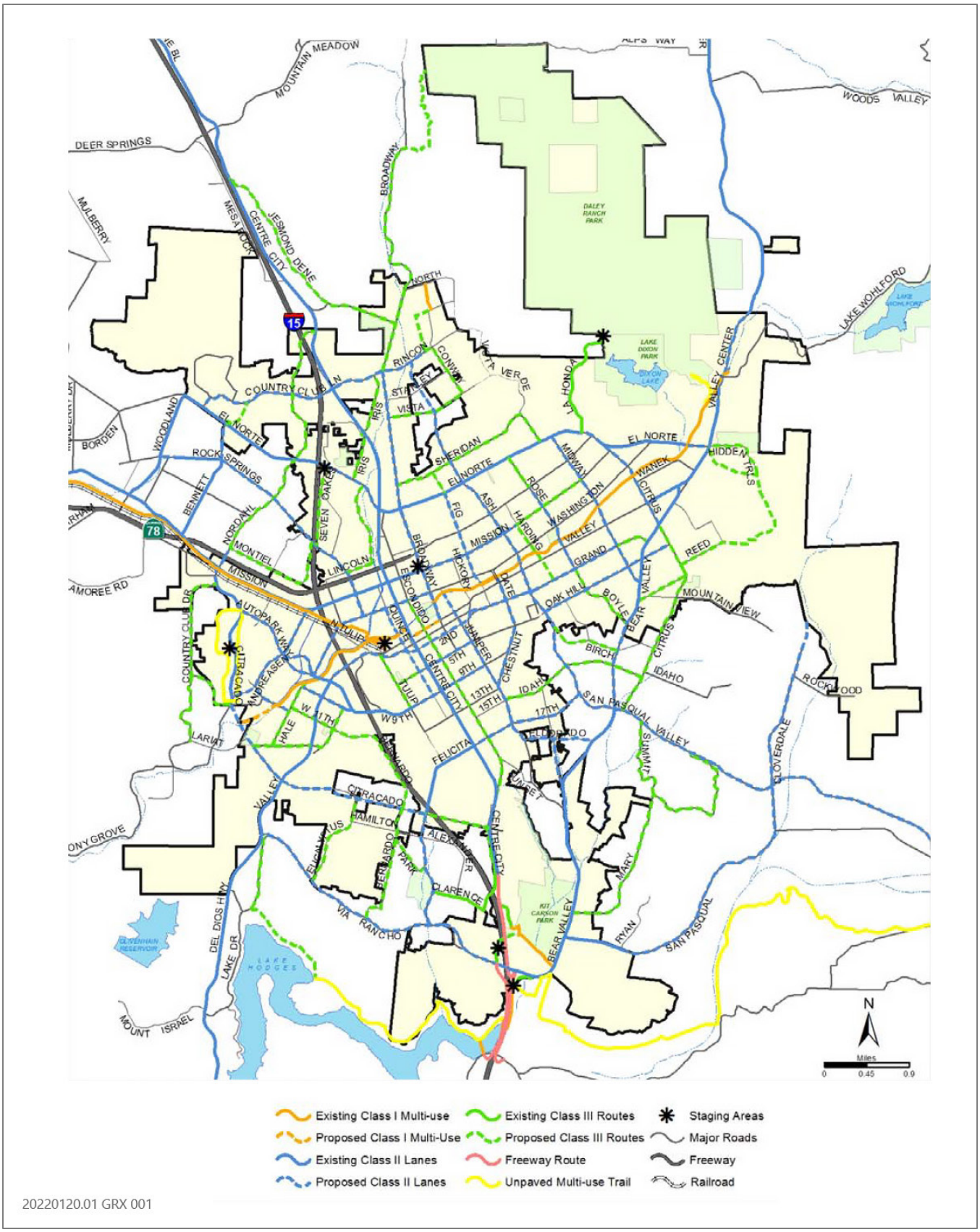
Source: image adapted by Ascent Environmental in 2022.

Figure 2-2 Project Location



Source: image prepared by Fehr & Peers in 2022, adapted by Ascent Environmental in 2022.

Figure 2-3 Early Action Sidewalk Projects



Source: image prepared by the city of Escondido in 2012, adapted by Ascent Environmental in 2022.

Figure 2-4 Existing and Planned Bikeways

2.4 DESCRIPTION OF THE PROPOSED PROGRAM

As required under SB 743, an applicant would perform a transportation VMT analysis to determine if a development project would result in a potentially significant transportation VMT impact under CEQA. If a potentially significant impact under CEQA is identified, an applicant would be required to first identify on-site mitigation measures in consultation with City Development Services staff to reduce the project's VMT. If a significant impact remains after applying on-site mitigation, the applicant would have the option to utilize the program for full or partial mitigation of the impact. The program would consist of projects that applicants can implement in exchange for VMT reductions that can be applied to individual development projects.

As part of the program, the applicant would consult with City Development Services Staff to discuss which VMT-reducing projects could be implemented to reduce VMT impacts. VMT-reducing projects would fall within the following categories: pedestrian network, bicycle network, and transit-supportive improvements. Table 2-1 identifies specific early action VMT-reducing projects that are part of the program. An applicant may select a project from the project list in Table 2-1. Alternatively, applicants may propose VMT-reducing projects at other locations beyond those listed in Table 2-1. However, applicant-proposed locations must be reviewed and approved by City Development Services Staff. VMT-reducing projects would be selected based on feasibility and considering the following conditions, as listed in order of priority:

a) The VMT-reducing project is near the development project (i.e., within a 0.5-mile travel distance from the development project) and connects the project or existing community to an existing pedestrian, bicycle or transit corridor.

b) If a VMT-reducing project that meets priority (a), cannot be identified, identify a VMT-reducing project that facilitates bicycle or pedestrian access to a key destination (e.g., park, school, community center, or shopping center) within a 0.5-mile travel distance from the development project.

c) If a VMT-reducing project that meets priorities (a) and (b), cannot be identified, then expand the geography to citywide, first identifying a VMT-reducing project that connects existing communities to an existing pedestrian, bicycle or transit corridor and then expanding to a VMT-reducing project that facilitates bicycle or pedestrian access to a key destination (e.g., park, school, community center, or shopping center).

Depending on the type of VMT-reducing project (i.e., pedestrian network, bicycle network, and transit-supportive improvements), additional parameters must be met. These parameters are described in Sections 2.4.1 to 2.4.3.

Adoption of the program would not directly result in changes to the physical environment; however, individual VMT-reducing projects would result in improvements to the existing transportation network. Physical improvements would vary depending on the type of VMT-reducing project an applicant selects. In general, physical improvements may include installing new painted or raised crosswalks or mid-block crossings; new painted or raised medians; new curb extensions, curb ramps, pedestrian refuge islands, or other modifications to existing curbs, gutters and drainage inlets; raised intersections; new colored concrete and/or colored pavement; new signage; re-striped vehicle lanes; new landscaping; new traffic signals; and new rapid rectangular flashing beacons. In addition, physical improvements may include modifying traffic signals (e.g., new phase for people on bikes/walking), repaving the roadway surface (e.g., slurry seal), adding new street lighting, marking new bike lanes or upgrading existing bike lanes, installing new street furniture and amenities at existing bus stops, and implementing similar minor physical improvements. Some of these physical improvements would require limited ground disturbance within existing, developed roadway rights-of-way. Some improvements may require relocating existing above-ground utilities (e.g., powerlines or utility boxes) or stormwater infrastructure (e.g., curb, gutter, and drains).

Table 2-1 VMT Exchange Program – Early Action Project List

#	Project	Unit	Daily VMT Reduction
Pedestrian Network Improvements			
1. Increase Sidewalk Coverage			
1-1	Rose Elementary: E. Lincoln Ave between N. Rose St and Thomas Way (North side)	850 feet	49 VMT
1-2	Rose Elementary: N. Rose Street between E. Lincoln Avenue and E. El Norte Parkway (East side)	1,750 feet	101 VMT
1-3	Rincon Middle School: Conway Drive between Rincon Avenue and Lehner Avenue (Both sides)	3,800 feet	219 VMT
1-4	Rincon Middle School: N. Ash Street between Spur Court to the City Limits (Both sides)	2,250 feet	130 VMT
1-5	Felicita Elementary: S. Redwood Street between 13th Avenue and 15th Avenue (West side)	700 feet	41 VMT
1-6	Felicita Elementary: S. Redwood Street between 15th and W. Felicita Avenue (Both sides)	1,150 feet	66 VMT
1-7	Felicita Elementary: 15th Avenue between Tulip Street and Centre City Parkway (Both sides)	2,250 feet	130 VMT
1-8	Felicita Elementary: 13th Avenue between S. Redwood Street and South Quince Street (South side)	400 feet	23 VMT
1-9	Hidden Valley Middle School: S. Citrus Avenue between La Ramada Lane and Patterson Road (East side)	950 feet	55 VMT
1-10	Farr Elementary: Farr Avenue between North Ash Street and North Fig Street (North side)	1,100 feet	64 VMT
1-11	Conway Elementary School Sheridan Avenue between N. Ash Street and Fallsview Place (North side)	950 feet	55 VMT
1-12	Escondido High School: Sheridan Avenue between Taft Street and N. Elm Street (Both sides)	2,100 feet	121 VMT
1-13	Calvin Christian School: Vista Avenue between N. Ash Street and Bello Hills Lane (South side)	920 feet	53 VMT
1-14	N. Ash Street between Rincon Avenue and Madison Avenue	Various	303 VMT per 1 mile of new sidewalk
1-15	Stanley Avenue between N. Broadway Street and Conway Street	Various	303 VMT per 1 mile of new sidewalk
1-16	Other locations	Various	303 VMT per 1 mile of new sidewalk
2. Improve Existing Pedestrian Infrastructure			
2-1	Intersection HVC	2 legs striped HVC	30 VMT
		4 legs striped HVC	60 VMT
		3 legs striped HVC for T-intersection	45 VMT
2-2	Intersection Pedestrian Refuge Islands	2 islands	30 VMT
		4 islands	60 VMT
		3 islands for T-intersection	45 VMT

#	Project	Unit	Daily VMT Reduction
2-3	Intersection Raised Crosswalk[1]	2 raised crosswalks	30 VMT
		4 raised crosswalks	60 VMT
		3 raised crosswalks for T-intersection	45 VMT
2-4	Intersection Pedestrian Signal Upgrades (countdown pedestrian heads and accessible pedestrian signals)	1 intersection upgrade (whole intersection)	60 VMT per intersection
2-5	Intersection Curb Ramps (directional ramps preferred)	1 corner	8 VMT per corner
2-6	Install Curb-Extensions (bulb-outs)	1 intersection approach	8 VMT per intersection approach (32 VMT maximum)
2-7	Upgrade Existing or Install New Mid-Block Crossing with HVC and RRFB/PHB (or other pedestrian activated crossing signals) as determined appropriated by the City's Crosswalk Policy	1 HVC Mid-Block Crossing with RRFB or PHB	30 VMT per mid-block crossing with RRFB or PHB
2-8	Mid-Block Crossing Pedestrian Refuge Island and other improvements as determined appropriate by the City's Crosswalk Policy	1 island	30 VMT per unit
2-9	Mid-Block Crossing Raised Crosswalk and other improvements as determined appropriate by the City's Crosswalk Policy	1 raised crosswalk	30 VMT per crosswalk
2-10	Traffic Calming Device (e.g., traffic circles, speed tables, other speed reduction features) as identified in the City's Traffic Management Toolbox[2]	Each device	30 VMT per each device (maximum 60 VMT per block)
2-11	Other pedestrian improvements may be identified through consultation with City Development Services staff	1 measure	30 VMT per measure as reviewed/approved by City Development Services staff
Bicycle Network Improvements			
3. Increase Bicycle Facility Coverage			
3-1	New Class I or Class IV Bikeway	1 mile (bi-directional)	107 VMT
3-2	New Class II Bike Lane	1 mile (bi-directional)	71 VMT
3-3	Upgrade Existing Bicycle Facility (from Class II to Class I or IV; Class III to Class I, II, or IV)	1 mile (bi-directional)	36 VMT
Transit Supportive Improvements			
4. Upgrade Bus Stops			
4.1	Upgrade Existing Bench Stop to Shelter Stop if all NCTD criteria are met[3]	1 upgrade	50 VMT

Notes: HVC = High-Visibility Crosswalk; RRFB = Rapid Rectangular Flashing Beacons; PHB = Pedestrian Hybrid Beacon; NCTD = North County Transit District

1. If high-visibility crosswalks are also installed at intersection raised crosswalks, the VMT reduction would not be doubled.

2. https://www.escondido.org/Data/Sites/1/media/Engineering/TrafficManagementToolbox.pdf

3. Upgrade must include all required amenities for shelter stops as described in the NCTD Bus Stop Development Handbook (NCTD 2018) guidelines.

Source: Fehr & Peers 2022.

In general, construction activities for each VMT-reducing project would last for approximately one to two weeks and would be completed in the following phases:

- Demolition (1-2 days): Sawcutting and removing existing hardscape.
- Grading (1 day): Minor grading, surface preparation, and compaction.
- Concrete (2-5 days): Placing concrete formwork and reinforcement, placing and finishing concrete, and stripping formwork.
- Paving (1 day): Installing asphalt concrete pavement.
- Striping (1 day): Striping and placing signs and pavement markers.

Construction equipment used for VMT-reducing projects may include concrete saws, a backhoe or mini excavator, skip loader, smooth drum roller, and dump truck. Additionally, a striping and paving machine may be required for some bicycle network improvement projects. On average, linear improvements would be completed at a rate of 250 to 350 feet per day.

2.4.1 Pedestrian Network Improvements

The program would include projects to increase sidewalk coverage throughout Escondido, with the objective of increasing access to surrounding land uses by providing new sidewalks, pedestrian ramps, and multi-use paths. Table 2-1 lists City-identified sidewalk projects included in the program, which includes locations near schools and areas of high pedestrian activity. Applicants may propose locations for sidewalk projects other than those listed in Table 2-1; however, the locations must be reviewed by City Development Services Staff to ensure that the locations are comparable to those identified in Table 2-1, result in increased pedestrian activity, and meet one of the conditions described above (a, b, or c), as listed in in order of priority.

The program would also include projects to improve the existing pedestrian network. These projects are intended to encourage people to walk instead of drive by improving the safety and quality of existing pedestrian infrastructure. Projects include the installation of high-visibility crosswalks, pedestrian hybrid beacons, pedestrian signals, mid-block crosswalks, pedestrian refuge islands, speed tables, bulb-outs (i.e., curb extensions), curb ramps, roundabouts and mini-circles, pedestrian-only connections and districts, and planter strips with street trees (minimum 1 mile). Table 2-1 lists City-identified pedestrian network improvement projects included in the program. Applicants may propose other types of pedestrian improvements; however, applicants must demonstrate how the improvements encourage walking. In addition, applicants may need to provide a VMT reduction study to justify the VMT reduction applied, if different from the VMT reduction shown in Table 2-1.

2.4.2 Bicycle Network Improvements

The program would include projects to increase the number of bicycle facilities or quality of existing bicycle facilities. Projects include the construction of new Class I facilities (bike paths that are physically separated from motor vehicle routes and have exclusive right-of-way for bicycles and pedestrians), Class II facilities (marked bicycle lanes within roadways), and Class IV facilities (protected bicycle lane that is separated from motor traffic with a physical barrier). Additionally, projects include upgrading existing bicycle facilities from Class II to Class I or IV facilities, or from Class III to Class I, II, or IV facilities. Applicants may select a location from the bicycle network gaps/opportunities within existing roadway rights-of-way identified in the City *Bicycle Master Plan* (City of Escondido 2012) or other planning document (e.g., General Plan or Specific Plan) if the location is not already funded by a different source. The City may also require the applicant to provide evidence of how the proposed bicycle facility would connect existing bicycle facilities or key destinations, based on the conditions described above (a, b, or c), thus contributing to increased bicycling and reduced VMT.

2.4.3 Transit-Supportive Improvements

Bus services within Escondido are provided generally by North County Transit District (NCTD) with some rapid service provided by MTS. VMT-reducing projects would include the installation of amenities at existing NCTD bus stops, such as lighting, transit route information, bicycle racks and lockers, benches, and shelters to enhance comfort and experience for users of NCTD bus services. Bus shelters would be required to meet the NCTD *Bus Stop Development Handbook* (NCTD 2018) guidelines or receive approval from NCTD. According to NCTD guidelines, bus stops would be required to have a bus stop sign, an ADA-accessible pad, a bench, a shelter, connection to adjacent sidewalks, and a trash receptable. Recommended and optional amenities include lighting, bicycle racks and lockers, transit route information, landscaping, transit system information, and digital messaging signs. Bus stop locations would be identified through consultation with City and NCTD staff, or selected from the locations identified as NCTD priorities.

2.5 PROGRAM OBJECTIVES

The following objectives have been identified for the program:

- Provide a list of community-based transportation projects and programs that can be selected to be full or partial mitigation for a transportation VMT impact pursuant to CEQA.
- Establish a framework that supports the development of facilities and infrastructure to support the City's future transportation needs.
- Reduce Citywide VMT to help meet greenhouse gas emission reduction targets identified in the City's CAP (City of Escondido 2021).

2.6 REQUIRED APPROVALS

The City of Escondido is the CEQA lead agency responsible for considering adoption and implementation of the program. As the lead agency under CEQA, the City is responsible for considering the adequacy of the Initial Study/Negative Declaration before determining if the overall program should be adopted. Table 2-2 summarizes the required approvals.

Table 2-2 Required Approvals

Approval	Approving Authority
Adopt Vehicle Miles Traveled Exchange Program	Escondido City Council
Adopt Initial Study/Negative Declaration	Escondido City Council

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3 ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION

1. **Project Title:** Vehicle Miles Traveled Exchange Program

2. **Lead Agency Name and Address:** City of Escondido
   Planning Division
   City Hall, First Floor
   201 North Broadway
   Escondido, CA 92025

3. **Contact Person and Phone Number:** Ivan Flores
   (760) 839-4529, iflores@escondido.org

4. **Project Location:** City of Escondido

5. **Project Sponsor's Name and Address:** Same as Lead Agency

6. **General Plan Designation:** Various

7. **Zoning:** Various

8. **Description of Project:**
   The proposed program is a Vehicle Miles Traveled (VMT) Exchange Program (program) – a voluntary program in which discretionary development applicants can participate to reduce the amount of VMT generated by their projects. The program will also provide applicants with the option to reduce potentially significant VMT impacts identified through the California Environmental Quality Act (CEQA) review process by constructing specified VMT-reducing projects that have been identified by the City. Initially, the program will provide applicants with the option to implement early action exchange program projects, which include pedestrian network, bicycle network, and transit supportive improvements that are located within existing developed rights of way. In the future, the types of projects included in the program may be expanded, for example to include trip reduction marketing or an intra-city shuttle, but these future project options would not be included in the initial program.

   If the program is adopted, any VMT-reducing projects that an applicant voluntarily elects to implement would be adopted as mitigation measures in the CEQA environmental review document for the applicable project. The program would require that VMT-reducing projects be completed by the applicant before the impact from the development project occurs. Ongoing monitoring and tracking of the implementation of VMT-reducing projects would be included in the City's annual CAP implementation status report.

9. **Surrounding Land Uses and Setting:**
   The City is located in the northern San Diego County (North County), approximately 30 miles north of Downtown San Diego. The City is bounded on the north by the unincorporated communities of Valley Center and Hidden Meadows, on the west by the City of San Marcos, on the south by Lake Hodges and the City of San Diego, and on the east by unincorporated San Diego County.

10. **Other public agencies whose approval is required:**
    None

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

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.

In compliance with PRC section 21080.3.1, the City provided formal written notification of the program on September 7, 2022 to Rincon Band of Luiseno Indians, San Luis Rey Band of Mission Indians, San Pasqual Band of Mission Indians, Soboba Band of Luiseno Indians, and Mesa Grande Band of Mission Indians. The San Pasqual Band of Mission Indians requested consultation on September 18, 2022, and the City and Tribe met on October 21, 2022. The Rincon Band of Luiseno Indians requested consultation on October 17, 2022, and the City and Tribe will meet on November 10, 2022. The tribal consultation process is ongoing and will be completed before the Final Initial Study/Negative Declaration is considered by the City Council. The outcome of consultation will be summarized in the Final Initial Study/Negative Declaration. Refer to Section 3.18, "Tribal Cultural Resources," for additional information.

ENVIRONMENTAL EFFECTS REQUIRING AN ENVIRONMENTAL IMPACT REPORT

If one or more boxes are checked for environmental topics below it means that the program would result in at least one "Potentially Significant Impact" as indicated by the checklist on the following pages, and that preparation of an environmental impact report (EIR) is required. If the box is checked for "None" or "None with Mitigation Incorporated" then preparation of an EIR is not required, and a negative declaration or mitigated negative declaration may be prepared.

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards / Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance
	☒ None	☐ None with Mitigation Incorporated

DETERMINATION (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 effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

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

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

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

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

Signature Ivan Flores Date 10/24/22

Printed Name Ivan Flores Title Associate Planner

Agency City of Escondido

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 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.

3.1 AESTHETICS

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

3.1.1 Environmental Setting

The City of Escondido is characterized by hills and mountains surrounding an open valley bisected by Escondido Creek. The hillsides and ridges are considered visually prominent in views from the valley floor. The natural setting of the city provides many opportunities for views from surrounding higher elevations. Other scenic natural features located throughout the city include creeks and riparian areas, rock outcroppings, and lakes. The city includes several large areas of open space that showcase these scenic resources, including parks, Multiple Habitat Conservation Program (MHCP) lands, and other designated conservation areas. These dramatic features are characteristics that distinguish Escondido from other areas in the region. The community derives its name, "hidden valley", from the ring of mountains which rise 1,500 feet above the valley floor. Escondido includes a historic downtown and urban core area. The urbanized core surrounds downtown within the “valley floor” of Escondido (City of Escondido 2012a; City of Escondido 20212b).

There are no state designated scenic highways or corridors within the program area (Caltrans 2019). However, the City has designated several scenic roadways including Interstate 15 (I-15), segments of Del Dios Highway, Via Rancho Parkway, Bear Valley Parkway, Valley Parkway, Lake Wohlford Road, South Citrus Avenue, and San Pasqual Valley Road (City of Escondido 2012b: 4.1-7)

Light and glare conditions within developed portions of the program area are typical of those associated with urban uses. The main sources of daytime glare in the program area are from sunlight reflecting from structures with reflective surfaces such as windows, and from vehicles on major roadways. Nighttime lighting is prevalent throughout the city along roadways, parking lots, building perimeters and within residential areas. The urban core of the City currently generates substantial nighttime light from signs, street lights and traffic lights, and security lighting. Nighttime light is reduced toward the northern and eastern edges of the planning area. The residential neighborhoods outside of the urban core utilize less lighting than the commercial and retail centers in the City’s

downtown. The large open spaces on the edge of the City, such as Lake Wohlford and Daley Ranch, generate very little light for security purposes (City of Escondido 2012b: 4.1-14).

3.1.2 Discussion

a) Have a substantial adverse effect on a scenic vista?

Less than significant. Adoption of the program would not directly result in changes to the physical environment; however, VMT-reducing projects would result in short-term construction and long-term changes to the physical environment. Implementation of the program would result in improvements to the City's existing pedestrian, bicycle, and transit network within existing roadway rights-of-way. Specific types of VMT-reducing projects include increasing sidewalk coverage; improving existing pedestrian infrastructure (e.g., adding new crosswalks, refuge islands, signals, curb ramps, curb-extensions, mid-block crossings, and traffic calming devices); adding new bicycle facilities or upgrading existing bicycle facilities; and upgrading existing bus stops to shelter stops. These improvements would be implemented at or near grade level of existing roadways; would not involve substantial grading or earthwork with potential to alter landforms; and would not introduce new features with substantial height, bulk, or massing that could block or impede existing scenic vistas. In addition, the VMT-reducing projects would be located in already disturbed, urbanized areas where existing transportation infrastructure (e.g., paved roadways, sidewalks, parking lots) and urban development (e.g., buildings, pavement, ornamental landscaping) are predominant.

The activities involved in constructing VMT-reducing projects would introduce visual elements to public viewsheds, including heavy equipment, stored materials, and fencing. Construction activities would vary depending on the type of VMT-reducing project, but may involve removing existing pavement; repaving roadway surfaces; painting or restriping pavement; modifying curbs; laying concrete, and installing traffic signals, lighting, landscaping, street furniture, and other amenities. Some of these improvements may require limited ground disturbance. Construction activities would be short-term and temporary, and would typically not involve equipment of substantial height, bulk, or massing that would alter existing scenic vistas. Following the construction period, construction equipment and materials would be removed from the program area. Therefore, construction-related effects on scenic vistas would not be substantial.

Thus, for all of the foregoing reasons, implementation of VMT-reducing projects under the program would not result in a substantial adverse effect on a scenic vista. This impact is less than significant.

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

Less than significant. Of the VMT-reducing projects that could be implemented as part of the program (listed in Table 2-1), one project (#1-9) would occur on a City-designated scenic roadway. This project would involve the addition of sidewalks on the east side of South Citrus Avenue between La Ramada Lane and Patterson Road (near Hidden Valley Middle School). Additionally, applicants may propose VMT-reducing projects at other locations throughout Escondido, which may include City-designated scenic roadways.

Construction associated with VMT-reducing projects would introduce heavy equipment, staged materials, and fencing within City-designated scenic roadways. However, construction activities would be short-term and temporary. Additionally, construction activities would be limited to disturbed areas within roadway rights-of-way where no scenic resources are present. Furthermore, construction activities would adhere to the City of Escondido Municipal Code (EMC) Section 33-1062, which outlines best management practices (BMPs) regarding trash and debris, erosion control, and perimeter control. Thus, construction associated with VMT-reducing projects would not result in substantial damage to scenic resources along City-designated scenic roadways.

As discussed in Section 3.1.2(a), VMT-reducing projects would include improvements to the City's existing pedestrian, bicycle, and transit network. These improvements would be implemented at or near grade level of existing roadways; would not involve substantial grading or earthwork with potential to alter landforms; and would not introduce new features with substantial height, bulk, or massing that could substantially damage scenic resources. In addition, the

VMT-reducing projects would be located in already disturbed, urbanized areas where existing transportation infrastructure is present. For all of the foregoing reasons, implementation of VMT-reducing projects under the program would not substantially damage scenic resources. This impact is less than significant.

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 points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than significant. The VMT-reducing projects listed in Table 2-1 are located in urbanized areas within the city of Escondido. Additionally, applicants may propose VMT-reducing projects at other locations throughout Escondido, which would be within roadway rights-of-way in urbanized areas. Therefore, the following analysis evaluates the potential for VMT-reducing projects that would be implemented as part of the program to conflict with applicable zoning and other regulations governing scenic quality.

The Resource Conservation Element of the City's General Plan includes policies to protect visual resources that provide aesthetic value to the city and contribute to the city's identity. Scenic resources of importance to the city include natural landforms, such as hillsides and ridgelines. Additional scenic resources include human-made buildings, structures, sites, and landscapes of cultural significance. The Escondido Zoning Ordinance (EMC Chapter 33) contains several articles that pertain to the protection of aesthetic character and scenic resources, including the following:

- Article 5, "Open Space Development Standards," establishes standards for the development of lands identified as having open space value to the community, such as slopes greater than 15 percent, vegetation conservation areas, and natural drainage courses.
- Article 35, "Outdoor Lighting," includes requirements intended to minimize outdoor light pollution and glare.
- Article 40, "Historical Resources," includes requirements for any new construction or alteration that would affect the exterior appearance of a historical resource.
- Article 55, "Grading and Erosion Control," includes requirements to ensure that development occurs in a manner that protects the natural and topographic character and identity of the environment and the visual integrity of hillsides and ridgelines.

Additionally, the City's *Design Standards and Standard Drawings* provide guidance for the design of all development and construction in the city. These standards apply to public improvements on streets and roadways fronting development projects and other offsite improvements, and include requirements related to sidewalks, street lights, traffic signals, street striping, street signs, landscaping, and bus stops (City of Escondido 2014).

VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would be located within roadway rights-of-way where existing transportation infrastructure is present. Improvements would be implemented at or near grade level of existing roadways and would not involve substantial grading or earthwork with potential to alter landforms. In addition, these projects would not introduce new features with substantial height, bulk, or massing that could block or impede views of scenic resources. As discussed further in Section 3.1.2(d) below, these projects would not include substantial new lighting or surfaces that would contribute to outdoor light pollution or glare. Additionally, as discussed further in Section 3.5.2(a), VMT-reducing projects would not involve construction that would affect the integrity of historic resources. Furthermore, VMT-reducing projects would be reviewed and approved by the City Engineer to ensure compliance with the City's *Design Standards and Standard Drawings* (City of Escondido 2014). Therefore, VMT-reducing projects would not conflict with policies in the City's General Plan or applicable zoning regulations governing scenic quality.

As described in Section 3.1.2(a), construction associated with VMT-reducing projects would introduce visual elements to public viewsheds, including heavy equipment, stored materials, and fencing. However, construction activities would

be short-term and temporary; would not involve equipment of substantial height, bulk, or massing; and would comply with applicable City regulations governing construction activities. Following the construction period, construction equipment and materials would be removed from the program area. Therefore, construction activities would not conflict with policies in the City's General Plan or applicable zoning regulations governing scenic quality.

Based on the above discussion, implementation of VMT-reducing projects under the program would not conflict with applicable zoning and other regulations governing scenic quality. This impact is less than significant.

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

Less than significant. The following sections describe the potential for the VMT-reducing projects that would be implemented as part of program to create substantial new sources of light and glare.

Light

As discussed in Section 3.1.2(a), VMT-reducing projects would include improvements to the City's existing pedestrian, bicycle, and transit network. As listed in Table 2-1, these improvements would include new pedestrian activated crossing signals (e.g., rapid rectangular flashing beacons and pedestrian hybrid beacons), new lighting at bus shelters, and upgraded pedestrian signals. These VMT-reducing projects would introduce new permanent light sources to the program area. The installation of permanent lighting would adhere to EMC Article 35, which governs outdoor lighting and includes requirements to minimize glare, light trespass, and artificial skyglow. Additionally, the City's outdoor lighting ordinance requires the use of the minimum amount of light to meet lighting criteria, proper shielding to prevent spillover, and the use of low-pressure sodium, narrow-spectrum light emitting diodes (LED) or equivalent light fixtures. Furthermore, VMT-reducing projects would be located in generally lit areas, characteristic of a typical urban environment. Thus, operation of VMT-reducing projects would not create a new source of substantial light that would adversely affect day or nighttime views in the area.

In accordance with EMC Section 17.234(a-e), construction activities would be limited to Monday through Friday between 7:00 a.m. and 6:00 p.m., or on Saturdays between 9:00 a.m. and 5:00 p.m. Therefore, no nighttime lighting is anticipated during construction, unless a variance has been obtained in advance from the City manager. In the event that nighttime construction is approved by the City manager, nighttime lighting would be directed on-site and away from adjacent light-sensitive receptors, such as residences, hotels, and hospitals. The introduction of light sources from construction activities would be short-term and temporary. Thus, construction activities would not create a new source of substantial light that would adversely affect day or nighttime views in the area.

Glare

As discussed in Section 3.1.2(a), VMT-reducing projects would include improvements to the City's existing pedestrian, bicycle, and transit network. Upgraded bus shelters may be fabricated with reflective materials such as glass, stainless steel, or aluminum; however, these materials would be coated with non-glare finishes. Bus shelters may also be equipped with photovoltaic panels as a power source for LED lighting and digital messaging signs; however, solar panels would be directed upward and out of the line-of-sight for motorists, pedestrians, bicyclists, and adjacent land uses. Any new sources of glare would be minimal and characteristic of a typical urban environment. Thus, operation of VMT-reducing projects would not create a new source of substantial glare that would adversely affect day or nighttime views in the area.

Construction associated with VMT-reducing projects could introduce glare from windshields of vehicles and construction equipment. The introduction of glare sources from construction activities would be minor, short-term, and temporary. Thus, construction activities would not create a new source of substantial glare that would adversely affect day or nighttime views in the area.

Summary

Based on the above discussion, implementation of VMT-reducing projects under the program would not create new sources of substantial light or glare. This impact is less than significant.

3.2 AGRICULTURE AND FOREST RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. Agriculture and Forest Resources.				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.				
In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the program:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

3.2.1 Environmental Setting

Most of the program area is urbanized, specifically areas near I-15 and State Route 78 (SR 78). Very few existing agricultural operations exist within the program area. Of the existing agricultural operations identified in the 2012 *Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Environmental Impact Report* (General Plan EIR), only the Watson Farms Llama Ranch, located on 1984 Greenview Road, is within the program area (City of Escondido 2012b).

The California Department of Conservation (DOC) Farmland Monitoring and Mapping Program (FMMP) produces maps and statistical data to analyze impacts on agricultural resources. FMMP classifies different agricultural land categories based on soil quality and suitability for agricultural uses including Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Grazing Land, and Urban and Built-Up Land. Most of the program area is

classified as Urban and Built-Up Land. Smaller areas of Farmland of Local Importance and Unique Farmland are scattered around the periphery of the program area. Small areas of Grazing Land are found in the western portion of the city, in the Rancho San Pasqual and Valley View specific plan areas (City of Escondido 2012b).

The Williamson Act was passed in 1965 to preserve agricultural and open space lands by discouraging premature and unnecessary conversion to urban uses. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. There are three parcels of Williamson Act Contract lands within the program area (City of Escondido 2012b).

There are no lands currently used for timber production or management in the program area. No lands within the program area have a zoning designation for timberland or forest land. The City has approximately 4,734 acres of forest resources under its jurisdiction, which include coast live oak woodland and Engelmann oak woodland habitat near Daley Ranch and Lake Wohlford (City of Escondido 2012b).

3.2.2 Discussion

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

and

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

No impact. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. The locations of VMT-reducing projects are identified in Table 2-1; however, applicants may propose VMT-reducing projects at other locations throughout Escondido. VMT-reducing projects would generally be located in urbanized areas that are within 0.5-mile travel distance of a proposed development project and in proximity to key destinations (e.g., existing parks, schools, community centers, or shopping centers). Additionally, the locations for VMT-reducing projects would be limited to disturbed areas within existing roadway rights-of-way that are classified as Urban and Built-Up Land and are not being used for agricultural production or enrolled in a Williamson Act contract. Therefore, implementation of VMT-reducing projects under the program would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance to non-agricultural use; conflict with existing zoning for agricultural use; or breach the conditions of a Williamson Act contract. No impact would occur.

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))?

and

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No impact. There are no lands currently used for timber production or management in the program area and no lands that have a zoning designation for timberland or forest land. Therefore, VMT-reducing projects that would be implemented as part of the program would not conflict with existing zoning or cause rezoning any forest land, timberland, or timber land zoned for timberland production. Additionally, VMT-reducing projects would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No impact. As described in Section 3.2.2(a), VMT-reducing projects would be in urbanized areas and would generally be within a 0.5-mile travel distance of a proposed development project and in proximity to key destinations (e.g., existing parks, schools, community centers, or shopping centers). Additionally, the locations for VMT-reducing projects would be limited to disturbed areas within existing roadway rights-of-way that do not support forest or agricultural uses. Therefore, implementation of VMT-reducing projects under the program would not result in changes to the existing environment that could result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

3.3 AIR QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality.				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations.				
Are significance criteria established by the applicable air district available to rely on for significance determinations?		☒ Yes		☐ No
Would the program:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3.3.1 Environmental Setting

The City of Escondido is in the San Diego Air Basin (SDAB), which encompasses San Diego County and is under the jurisdiction of San Diego County Air Pollution Control District (SDAPCD). Regional and local air quality in the SDAB is affected by topography, dominant airflows, location, and season. The SDAB is bounded by the Pacific Ocean to the west and high mountain ranges to the east, which inhibit the dispersal of pollutants to the east. The region is characterized by warm dry summers and mild winters, and rainfall averages approximately 9 to 14 inches annually. During fall, the region often experiences dry, warm easterly winds, called the Santa Ana winds, which raise temperatures and lower humidity. Two types of high-pressure cells, called subsidence and radiation inversions, affect air quality in the SDAB and trap the dispersion of pollutants, resulting in temporary degradation of air quality (City of Escondido 2012a).

CRITERIA AIR POLLUTANTS

Concentrations of emissions from criteria air pollutants (i.e., the most prevalent air pollutants known to be harmful to human health) are used to indicate the quality of the ambient air. Criteria air pollutants include ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable and fine particulate matter (PM_{10} and $PM_{2.5}$), and lead. The sources of criteria air pollutants and their respective acute and chronic health impacts are described in Table 3-1.

Table 3-1 Sources and Health Effects of Criteria Air Pollutants

Pollutant	Sources	Acute[1] Health Effects	Chronic[2] Health Effects
Ozone	Secondary pollutant resulting from reaction of ROG and NO_X in presence of sunlight. ROG emissions result from incomplete combustion and evaporation of chemical solvents and fuels; NO_X results from the combustion of fuels	Increased respiration and pulmonary resistance; cough, pain, shortness of breath, lung inflammation	Permeability of respiratory epithelia, possibility of permanent lung impairment
Carbon monoxide (CO)	Incomplete combustion of fuels; motor vehicle exhaust	Headache, dizziness, fatigue, nausea, vomiting, death	Permanent heart and brain damage
Nitrogen dioxide (NO_2)	Combustion devices (e.g., boilers, gas turbines) and mobile and stationary reciprocating internal combustion engines	Coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis or pulmonary edema; breathing abnormalities, cough, cyanosis, chest pain, rapid heartbeat, death	Chronic bronchitis, decreased lung function
Sulfur dioxide (SO_2)	Coal and oil combustion, steel mills, refineries, and pulp and paper mills	Irritation of upper respiratory tract, increased asthma symptoms	Insufficient evidence linking SO_2 exposure to chronic health impacts
Respirable particulate matter (PM_{10}), Fine particulate matter ($PM_{2.5}$)	Fugitive dust, soot, smoke, mobile and stationary sources, construction, fires and natural windblown dust, and formation in the atmosphere by condensation and/or transformation of SO_2 and ROG	Breathing and respiratory symptoms, aggravation of existing respiratory and cardiovascular diseases, premature death	Alterations to the immune system, carcinogenesis
Lead	Metal processing	Reproductive/developmental effects in fetuses and children	Numerous effects including neurological, endocrine, and cardiovascular effects

1. "Acute" refers to effects of short-term exposures to criteria air pollutants, usually at fairly high concentrations.

2 "Chronic" refers to effects of long-term exposures to criteria air pollutants, usually at lower, ambient concentrations.

Notes: NO_X = oxides of nitrogen; ROG = reactive organic gases.

Sources: EPA 2022.

TOXIC AIR CONTAMINANTS

Toxic air contaminants (TACs), also called hazardous air pollutants, are a defined set of airborne pollutants that may pose a present or potential hazard to human health. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are separated into carcinogens and non-carcinogens based on the nature of the physiological effects associated with exposure to the pollutant. Carcinogens are assumed to have no safe threshold below which health impacts would not occur.

According to the *California Almanac of Emissions and Air Quality* (CARB 2013), the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being diesel particulate matter (diesel PM). Diesel PM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emissions control system is being used. In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

ODORS

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). Odor sources of concern can include wastewater treatment plants, landfills and composting facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, and food processing facilities.

SENSITIVE RECEPTORS

Sensitive receptors are generally considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residential dwellings, schools, childcare facilities, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and/or the potential for increased and prolonged exposure of individuals to pollutants.

FEDERAL AND STATE AMBIENT AIR QUALITY STANDARDS

The U.S. Environmental Protection Agency (EPA) has been charged with implementing national air quality programs. EPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), which was enacted in 1970 and most recently amended by Congress in 1990. The CAA required EPA to establish the National Ambient Air Quality Standards (NAAQS) for the following criteria air pollutants: ozone, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. The CAA also requires each state to prepare a state implementation plan (SIP) for attaining and maintaining the NAAQS. The federal CAA Amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. Individual SIPs are modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies.

The California Air Resources Board (CARB) is the agency responsible for coordination and oversight of State and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA). The CCAA, which was adopted in 1988, required CARB to establish its own California Ambient Air Quality Standards (CAAQS). CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the above-mentioned criteria air pollutants. In most cases, the CAAQS are more stringent than the NAAQS.

The SDAB is currently designated as nonattainment for ozone with respect to the NAAQS and designated as nonattainment for ozone, PM_{10}, and $PM_{2.5}$ with respect to the CAAQS (SDAPCD n.d.).

SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT

SDAPCD is the agency responsible for regulating sources of air pollution within San Diego county and the SDAB to protect public health and welfare through the administration of federal and State air quality laws and policies. SDAPCD is responsible for monitoring air pollution, preparing the San Diego County portion of the SIP, and developing and implementing rules and regulations.

SDAPCD also develops air quality plans to identify the pollution control measures needed to expeditiously attain and maintain air quality standards. In response to the federal nonattainment designation for the 8-hour ozone standard, SDAPCD prepared the *2008 Eight-Hour Ozone Attainment Plan for San Diego County* and the *2008 Eight-Hour Ozone Reasonably Available Control Technology Demonstration for San Diego County,* which identify control measures and rules implementing "reasonably available control technology" necessary to bring the SDAB into attainment (SDAPCD 2016a; SDAPCD 2016b). These documents were submitted to the EPA through CARB for approval as part of the San Diego County portion of the SIP for attaining and maintaining the 2008 eight-hour ozone standard. SDAPCD subsequently prepared the *2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County* and the *2020 Reasonably Available Control Technology Demonstration for the National Ambient Air Quality*

Standards for Ozone in San Diego County to demonstrate how the region will further reduce air pollutant emissions in order to attain the current NAAQS for ozone in the future (SDAPCD 2020a, SDAPCD 2020b). These documents were submitted to the EPA as a revision to the San Diego County portion of the SIP for attaining the 2008 and 2015 eight-hour ozone standards.

In compliance with the CCAA, SDAPCD has also developed the *2016 Revision of the Regional Air Quality Strategy for San Diego County* (RAQS) to address ozone (SDAPCD 2016c). The RAQS is currently being updated to reflect more recent information on air quality, emission trends, and new feasible control measures.

SAN DIEGO COUNTY

Neither the City of Escondido nor SDAPCD have adopted CEQA thresholds of significance for assessing air quality impacts. However, the County of San Diego Planning & Development Services department has prepared the *Guidelines for Determining Significance, Air Quality*, which present screening level thresholds (SLTs) of significance for regional air pollutant emissions (County of San Diego 2007). The County's air quality SLTs were developed based on SDAPCD stationary source trigger levels (Rule 20.2 and Rule 20.3) and are tied to achieving or maintaining attainment designations with the NAAQS and CAAQS. Supportive of the NAAQS and CAAQS, the County's SLTs are scientifically substantiated, numerical mass emissions levels of criteria air pollutants considered to be protective of human health. A project with emissions rates below these thresholds, shown in Table 3-2, is considered to have a less-than-significant impact on regional and local air quality and would avoid the impacts on human health identified in Table 3-1.

Table 3-2 County of San Diego Screening-Level Thresholds for Air Quality Impact Analysis

Pollutant	Mass Daily Thresholds (lbs/day)
Respirable particulate matter (PM_{10})	100
Fine particulate matter ($PM_{2.5}$)	55
Oxides of nitrogen (NO_X)	250
Oxides of sulfur (SO_X)	250
Carbon monoxide (CO)	550
Lead and lead compounds	3.2
Volatile organic compounds (VOCs)	75

Notes: lbs/day = pounds per day

Source: County of San Diego 2007.

3.3.2 Discussion

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than significant. The emission inventories used to develop the applicable air quality attainment plans (i.e., *2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County*, *2020 Reasonably Available Control Technology Demonstration for the National Ambient Air Quality Standards for Ozone in San Diego County*, and *2016 Revision of the Regional Air Quality Strategy for San Diego County*) are based primarily on projected population and employment growth and VMT for SDAB. These projections are based, in part, on the planned growth identified in regional and local plans. Therefore, projects that would result in increases in population or employment growth beyond that projected in regional or local plans could result in increases in VMT above those forecasted in the attainment plans, further resulting in mobile source emissions that could conflict with or obstruct implementation of air quality planning efforts for the SDAB. An increase in VMT beyond that projected in applicable air quality plans generally would be considered to have a significant adverse incremental effect on the SDAB's ability to attain or maintain State and federal ambient air quality standards. The analysis below focuses on whether the program would increase population, employment, or VMT above planned levels.

VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These improvements would not induce population growth directly or indirectly because they do not propose new housing and do not propose changes to policies or regulations related to land use or residential zoning. Rather, as shown in Table 2-1, VMT-reducing projects are anticipated to reduce vehicle trips. The VMT reductions would vary depending on the type and length of improvements. Therefore, implementation of the program would not result in an increase in VMT relative to projections included in applicable air quality plans. Furthermore, VMT reductions would improve overall air quality in the SDAB by reducing mobile-source emissions of criteria air pollutants. The effects associated with the reduction of air pollutant emissions in the SDAB would be beneficial.

Construction associated with VMT-reducing projects could result in a temporary increase in the number of construction workers in the program area. These types of projects would be considered small construction projects, which would not require a large construction crew or generate substantial vehicle trips. Furthermore, construction workers would likely be sourced from the San Diego region. Permanent, substantial relocation of workers would not be required. Therefore, construction activities associated with VMT-reducing projects would not result in substantial population growth, employment growth, or VMT increases.

Based on the above discussion, VMT-reducing projects would not induce substantial population or employment growth, would not increase VMT, and would result in beneficial air quality effects; therefore, implementation of VMT-reducing projects under the program would not conflict with or obstruct implementation of any applicable air quality plans. This impact is less than significant.

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?

Less than significant. The SDAB is designated as nonattainment for ozone with respect to the NAAQS and designated as nonattainment for ozone, PM_{10}, and $PM_{2.5}$ with respect to the CAAQS. Impacts would be cumulative in nature if the program, in combination with cumulative development, leads to violation of any air quality standard or contributes substantially to an existing or projected air quality violation. In developing thresholds of significance for air pollutants, the County of San Diego and SDAPCD (through Rules 20.2 and 20.3) considered the emission levels for which a project's individual emissions would be cumulatively considerable. For the purposes of this analysis, the program would result in a significant localized and/or regional air quality impact such that human health would be adversely affected if it would cause construction-generated or operational criteria air pollutant or precursor emissions to exceed the County's SLTs of 100 pounds per day (lbs/day) for PM_{10}, 55 lbs/day for $PM_{2.5}$, 250 lbs/day for NO_X and SO_X, 550 lbs/day for CO, and 75 lbs/day for volatile organic compounds (VOCs).

As discussed in Section 3.3.2(a), VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. VMT-reducing projects are anticipated to reduce vehicle trips. The VMT reductions would vary depending on the type and length of improvements. Therefore, VMT-reducing projects would improve overall air quality in the SDAB by reducing mobile-source emissions of criteria air pollutants. The effects associated with the reduction of air pollutant emissions in the SDAB would be beneficial.

Construction of VMT-reducing projects would result in emissions of PM_{10}, $PM_{2.5}$, NO_X, SO_X, CO, and VOCs from the use of construction equipment, construction worker vehicle trips, and truck hauling trips. Emissions of fugitive dust (PM_{10} and $PM_{2.5}$) are largely associated with ground-disturbing activities, such as site preparation. Construction of VMT-reducing projects could require a temporary increase in the number of construction workers, ground disturbance, and use of construction equipment. Construction-related emissions would be minor and temporary. Some air districts have established screening level sizes for the types of projects that would be expected to generate significant levels of criteria air pollutants during construction, such as a 114 dwelling unit single-family development, or a 277 thousand square foot office park, which are much larger projects than would be implemented under the program (BAAQMD 2017). Therefore, construction of VMT-reducing projects would not result in a cumulatively considerable net increase of criteria pollutants.

Based on the above discussion, implementation of VMT-reducing projects under the program would not result in the violation of any air quality standard or result in a cumulatively considerable contribution to an existing or projected air quality violation. VMT-reducing projects would not result in emissions that would exceed the County's SLTs, and therefore, would not contribute to nonattainment designations and would not exacerbate or interfere with the region's ability to attain the health-based standards. This impact is less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant. The following sections describe the potential for the VMT-reducing projects that would be implemented as part of program to expose sensitive receptors to substantial concentrations of CO and TACs.

Carbon Monoxide

The single largest source of CO is motor vehicle engines. CO concentration near roadways is a direct function of vehicle idling time and, thus, traffic flow conditions. VMT-reducing projects that would be implemented as part of the program would not result in any residential development that would directly cause regional population growth or otherwise induce population growth. Additionally, VMT-reducing projects would not change existing land use designations in a manner that would increase traffic or have the potential to result in CO hotspots. Rather, the goal of VMT-reducing projects is to reduce vehicle trips, which would have the co-benefit of reducing vehicle idling time and air pollutant emissions. Although there would be a temporary increase in vehicle trips related to construction worker commute and equipment delivery, VMT-reducing projects would not result in substantial short- or long-term vehicle trip generation at levels that could cause unhealthy concentrations of CO on nearby roadways. Therefore, the program would not create or contribute to a CO hotspot.

Toxic Air Contaminants

For projects that do not propose stationary sources of emissions, diesel PM is the primary TAC of concern. Diesel PM dissipates rapidly from the source, and exposure concentrations would decline with distance from construction activities (Zhu et al. 2002). The dose to which receptors are exposed is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, should be based on a 70- or 30-year exposure period. However, such assessments should be limited to the period and duration of activities that generate TAC emissions (OEHHA 2015).

VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These types of improvements would not introduce new stationary or mobile sources of diesel PM emissions. Rather, VMT-reducing projects are anticipated to reduce vehicle trips and vehicle idling time, which would have the co-benefit of reducing diesel PM emissions. Therefore, VMT-reducing projects would result in beneficial long-term air quality impacts.

Construction of VMT-reducing projects would result in diesel PM emissions from the use of construction equipment and from the use of haul trucks to deliver materials. These types of construction activities would occur in residential and commercial areas, which include sensitive receptors such as residences, schools, and hospitals. However, these activities would involve minimal use of heavy-duty diesel equipment and thus, diesel PM emissions would be minimal well. Furthermore, construction activities would be temporary and it is unlikely that construction involving use of heavy-duty diesel equipment or vehicles would last for longer than one to two weeks for the most-intensive VMT-reducing projects (e.g., installing new roundabouts, sidewalks, and bicycle facilities), which is a short exposure period relative to the 30- or 70-year exposure timeframe recommended for health risk assessments. Construction activities would not be of the size, intensity, or duration to exceed County's SLTs or to emit substantial TAC concentrations. The County has adopted these thresholds in consideration of achieving attainment for the NAAQS and CAAQS, which represent concentration limits of criteria air pollutants needed to adequately protect human health. Because construction of VMT-reducing projects would not exceed the County's SLTs and would not emit substantial TAC

concentrations, these projects would not exacerbate or interfere with the region's ability to attain the health-based standards.

Summary

Based on the above discussion, implementation of VMT-reducing projects under the program would not result in the violation of any air quality standard and would not expose sensitive receptors to substantial pollutant concentrations such that human health would be adversely affected. This impact is less than significant.

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

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These types of improvements would not introduce new permanent sources of emissions, such as those leading to odors (e.g., wastewater treatment plants, landfills and composting facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, and food processing facilities). However, the activities involved in constructing VMT-reducing projects, such as asphalt paving and use of diesel-powered construction vehicles and equipment, would result in temporary emissions, including odors. Although construction activities would generally occur in populated residential and commercial areas, emissions would be intermittent in nature, highly localized, and would disperse rapidly from the source. Additionally, emissions would be minimal, short-term, and would cease upon completion of construction. Therefore, construction-generated emissions, such as odors, would not adversely affect a substantial number of people. Based on the above discussion, implementation of VMT-reducing projects under the program would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people. This impact is less than significant.

3.4 BIOLOGICAL RESOURCES

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

3.4.1 Environmental Setting

The city of Escondido is largely built out, and remaining native habitat is primarily located along the city's periphery, adjacent to undeveloped portions of unincorporated county. Land cover within the city is comprised of developed land, chaparral, coastal sage scrub, oak woodland, grassland, and riparian habitat. Chaparral communities, particularly southern mixed chaparral and chamise chaparral, dominate on higher and steeper slopes in northern Escondido. Coastal sage scrub and oak woodland communities are located around the outskirts of the city. Grassland habitats are prominent along the southeastern and eastern edges of the city. Riparian habitats within the city include freshwater marsh and wetland habitats. Riparian forests, woodlands, and scrub communities are found along many of the drainages with the most significant stands associated with Kit Carson Park (City of Escondido 2012b).

Five large areas of natural habitats, located in the northeastern, eastern, southern, southwestern, and northwestern portions of the city support an array of reptiles, amphibians, birds, and small mammals. At the time the City's General Plan EIR was adopted, the program area was found to support 42 special-status plant species and 64 special-status wildlife species, including Harbison's dun skipper, southwestern pond turtle, coastal cactus wren, Cooper's hawk, golden eagle, and burrowing owl (City of Escondido 2012b).

Wildlife movement primarily occurs within large natural habitat areas in the city. These areas provide two primary landscape linkages: (1) east-west across the northern portion of the city, including Daley Ranch, between the County of San Diego and northern San Marcos; and (2) east west across the southern portion of the city, as part of the San Pasqual River Valley corridor. The southern habitat linkage, in particular, is considered essential for maintaining natural genetic exchange and population connectivity for the California gnatcatcher and coastal cactus wren populations in the San Pasqual River Valley (City of Escondido 2012b).

The MHCP, adopted by San Diego Association of Governments (SANDAG) in 2003, is a comprehensive, multiple jurisdictional sub-regional habitat planning program designed for northwestern San Diego County. The city of Escondido is included in the MHCP study area for which SANDAG, in cooperation with the City, created a Draft Escondido Subarea Plan. The subarea plans describe specific biological conservation policies each city agrees to institute to implement the MHCP (City of Escondido 2001). The public review draft of the Escondido Subarea Plan was released in 2001; however, the subarea plan was not adopted by the city. The subarea plan covers the entire city boundary and approximately 3,000 acres of unincorporated County land within the City's sphere of influence (City of Escondido 2001).

3.4.2 Discussion

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

No Impact. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. The activities involved in constructing VMT-reducing projects would include minor grading, excavation, and other ground disturbance. However, VMT-reducing projects would be located in areas that lack suitable habitat for candidate, sensitive, or special-status species. Most construction activities would be located in developed areas within roadway rights-of-way, such as on existing roads and sidewalks. Some VMT-reducing projects, such as those involving new sidewalk coverage, may occur along undeveloped roadway shoulders; however, construction activities would be limited to small, disturbed areas that contain ruderal vegetation and are surrounded by urban development. Therefore, implementation of VMT-reducing projects under the program would not result in a substantial adverse effect on candidate, sensitive, or special-status species. No impact would occur.

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

No Impact. As discussed in Section 3.4.2(a), VMT-reducing projects would be located in developed areas within roadway rights-of-way, such as on existing roads and sidewalks, or in disturbed areas along roadway shoulders that are surrounded by urban development. These projects would be located in areas that lack riparian habitat or other sensitive natural communities. Therefore, implementation of VMT-reducing projects under the program would not result in a substantial adverse effect on any riparian habitat or other sensitive natural communities. No impact would occur.

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?

No Impact. As discussed in Section 3.4.2(a), VMT-reducing projects would be located in developed areas within roadway rights-of-way, such as on existing roads and sidewalks, or in disturbed areas along roadway shoulders that are surrounded by urban development. These projects would be located in areas where protected wetlands are not present. Therefore, implementation of VMT-reducing projects under the program would not result in a substantial adverse effect state or federally protected wetlands. No impact would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. As discussed in Section 3.4.2(a), VMT-reducing projects would be located in developed areas within roadway rights-of-way, such as on existing roads and sidewalks, or in disturbed areas along roadway shoulders that are surrounded by urban development. These projects would be located in areas where wildlife corridors and nursery sites are not present. Therefore, implementation of VMT-reducing projects under the program would not interfere with wildlife corridors or impede the use of native wildlife nursery sites. No impact would occur.

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

No Impact. General Plan Policy 1.9 of the Resource Conservation Element directs the City to encourage proposed development projects to minimize the removal of significant stands of trees unless needed to protect public safety and to limit tree removal to the minimum amount necessary to assure continuity and functionality of building spaces. Additionally, the City's Municipal Code includes regulations governing the protection of biological resources, including mature and protected trees. EMC Section 33-1052 defines a protected tree as "any oak (genus quercus) which has a ten (10) inch or greater DBH, or any other species or individual specimen listed on the local historic register, or determined to substantially contribute to the historic character of a property or structure listed on the local historic register, pursuant to Article 40 of the Escondido Zoning Code." EMC Section 1068 prohibits the removal of trees and encroachment by new construction or improvements into the dripline of protected and required trees within the public right-of-way without a vegetation removal permit. In addition, pursuant to EMC Section 33-1069, every feasible effort shall be made to preserve sensitive biological habitat, sensitive biological species, mature trees, and protected trees in-place.

As discussed in Section 3.4.2(a), VMT-reducing projects would be located in developed areas within roadway rights-of-way, such as on existing roads and sidewalks, or in disturbed areas along roadway shoulders that are surrounded by urban development. Construction activities would occur in areas where protected biological resources are not present. Additionally, VMT-reducing projects would not require trimming, pruning, shaping, or removal of any mature or protected trees. Therefore, implementation of VMT-reducing projects under the program would not conflict with local policies or ordinances protecting biological resources. No impact would occur.

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?

Less than significant. The Draft Escondido Subarea Plan has not been adopted. However, the City complies with the conservation policies identified in the MHCP through use of the Draft San Escondido Subarea Plan as an implementation tool. As discussed in Section 3.4.2(a), VMT-reducing projects would be located in developed areas within roadway rights-of-way, such as on existing roads and sidewalks, or in disturbed areas along roadway shoulders that are surrounded by urban development. Construction activities would occur in areas that lack natural habitat. Therefore, VMT-reducing projects would not conflict with the provisions of SANDAG's MHCP. No impact would occur.

3.5 CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources.				
Would the program:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☒	☐
c) Substantially disturb human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

3.5.1 Environmental Setting

CEQA defines historic resources as those that are listed on, or determined to be eligible for listing on, the California Register of Historical Resources (CRHR) or a local register, or are otherwise determined to be historical pursuant to CEQA (PRC Section 21084.1) or the CEQA Guidelines (CCR Title 14, Section 15064.5). The CRHR also includes properties formally determined eligible for listing or listed in the National Register of Historic Places (PRC Section 5024.1). A historic resource may be an object, building, structure, site, area, place, record, or manuscript that is historically significant or significant in terms of California's architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records (PRC Section 5020.1[j]). Typically, historic resources are more than 50 years old. The city contains historical sites that are designated on local, state, and national historical lists, and that meet the definitions of historical resources under Section 15064.5(a) of the State CEQA Guidelines. These resources include historic districts, parks, buildings, roadways, and bridges (City of Escondido 2012b).

Archaeological resources may be considered historic resources or, if not, they may be determined to be "unique" as defined by CEQA (PRC Section 21083.2[g]). A "unique archaeological resource" is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) is directly associated with a scientifically recognized important prehistoric or historic event or person. Archaeological resources within the city are primarily associated with settlement patterns of the area over time beginning approximately 10,000 years ago. The City has recorded hundreds of known archaeological sites, but the locations are kept confidential in order to protect those resources. Known archaeological resources within archaeological sites include, but are not limited to, bedrock milling sites, midden deposits, rock art, stone artifacts, concrete pads, local stone foundations, and refuse scatters containing historic age trash (City of Escondido 2012b).

3.5.2 Discussion

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. Construction activities would occur within roadway rights-of-way and would not involve the demolition, destruction, alteration, or structural relocation of a historical resource. VMT-reducing projects may be located within the boundaries of a potential or formally designated historic district. However, these projects would be required to comply with applicable requirements in the City's *Design Standards and Standard Drawings*, including standards for construction and maintenance of curbs, sidewalks, and pedestrian ramps within historic districts (City of Escondido 2014). Compliance with the EMC Article 40, Section 33-798, would protect historic resources from adverse change by requiring the project proponent to obtain a permit and Certificate of Appropriateness for any new construction or alteration that would affect the exterior appearance of a historical resource listed on the local register, or located within an historical overlay district, including the back, sides, and street façade, even when a building permit is not otherwise required. Additionally, public right-of-way improvements (e.g., curb and gutter, sidewalks, street paving, curb cuts, driveways, and stamped sidewalk) and new street furniture would be subject to historic preservation commission review prior to project approval. Compliance with local requirements would ensure that implementation of VMT-reducing projects under the program would not cause a substantial adverse change in the significance of a historical resource. This impact is less than significant.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. The activities involved in constructing VMT-reducing projects would include minor grading, excavation, and other ground disturbance. However, VMT-reducing projects would be located in developed areas within roadway rights-of-way, such as on existing roads and sidewalks, or in disturbed areas along roadway shoulders. Because ground disturbance would be limited to shallow depths, comprised of artificial fill or previously disturbed soils, archaeological resources are unlikely to be encountered. Furthermore, VMT-reducing projects would be consistent with General Plan Goal 5 and Policies 5.2 of the Resource Conservation Chapter, which call for the preservation of important cultural and paleontological resources that contribute to the unique identity and character of Escondido. Policy 5.2 encourages the preservation of significant cultural and paleontological resources listed on the national, state, or local registers through maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process (City of Escondido 2012a). Therefore, implementation of VMT-reducing projects under the program would not adversely affect archaeological resources. This impact is less than significant.

c) Substantially disturb human remains, including those interred outside of formal cemeteries?

Less than significant. As discussed in Section 3.5.2(b), the activities involved in constructing VMT-reducing projects would include minor grading, excavation, and other ground disturbance. However, VMT-reducing projects would be located in developed areas within roadway rights-of-way, such as on existing roads and sidewalks, or in disturbed areas along roadway shoulders. Because ground disturbance would be limited to previously disturbed soils, human remains are unlikely to be encountered.

In the unlikely event that human remains are encountered during construction activities, applicants would be required to comply with California Health and Safety Code Section 7050.5, which states that if human remains are discovered during project construction, no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin. Further, pursuant to California PRC Section 5097.98(b), remains shall be left in place and free

from disturbance until a final decision as to the treatment and disposition of the remains has been made. If the County Coroner determines the remains to be of Native American origin, the Native American Heritage Commission (NAHC) shall be contacted within 24 hours. Subsequently, the NAHC shall identify the most likely descendant (MLD). The MLD shall then make recommendations and engage in consultations concerning the treatment of the remains as provided in California PRC Section 5097.98. Because of the limited potential for human remains to be encountered during construction activities and required compliance with existing regulations pertaining to the discovery of human remains, implementation of VMT-reducing projects under the program would not substantially disturb human remains. This impact is less than significant.

3.6 ENERGY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy.				
Would the program:				
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?	☐	☐	☒	☐

3.6.1 Environmental Setting

ENERGY SOURCES

San Diego Gas & Electric (SDG&E) is a regulated public utility that provides energy service to 3.7 million people within a 4,100-square-mile service area that encompasses San Diego and southern Orange counties (SDG&E 2022a). SDG&E is the primary electricity and natural gas supplier for the City (City of Escondido 2012b). SDG&E obtains electricity from a variety of sources, including SDG&E-owned facilities and other private and publicly owned facilities that provide electricity through contracts and agreements. In 2020, SDG&E delivered approximately 40 percent renewable energy to its customers (SDG&E 2022b).

ENERGY REGULATIONS

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the California Energy Commission (CEC). The Warren-Alquist Act established State policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The California Public Utilities Commission (CPUC) regulates privately-owned utilities in the energy, rail, telecommunications, and water fields.

State of California Energy Action Plan

The CEC, CPUC, and now defunct Consumer Power and Conservation Financing Authority prepared the first State of California Energy Action Plan (EAP) in 2003 to establish shared goals and specific actions to ensure that adequate, reliable, and reasonably-priced electrical power and natural gas supplies are achieved and provided through policies, strategies, and actions that are cost-effective and environmentally sound for California's consumers and taxpayers. The plan was updated in 2005 and 2008 to address policy, the emerging importance of climate change, transportation-related energy issues, and research and development activities (CEC and CPUC 2008).

Transportation-Related Regulations

Various regulatory and planning efforts are aimed at reducing dependency on fossil fuels, increasing the use of alternative fuels, and improving California's vehicle fleet. SB 375 aligns regional transportation planning efforts, regional greenhouse gas (GHG) emission reduction targets, and land use and housing allocation. CARB, in

consultation with the metropolitan planning organizations, provides each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in their respective regions for 2020 and 2035.

As described in Section 2.2, Senate Bill 743 directed OPR to adopt CEQA Guidelines addressing "criteria for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." SB 743 resulted in a fundamental shift to the manner in which transportation impacts are considered under CEQA, which has led to the need for the development and application of new VMT-based mitigation strategies and options.

Renewable Energy Regulations

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB X1-2 also requires the renewable electricity standard to be met increasingly with renewable energy that is supplied to the California grid from sources within, or directly proximate to, California. SB X1-2 mandates that renewables from these sources make up at least 50 percent of the total renewable energy for the 2011-2013 compliance period, at least 65 percent for the 2014-2016 compliance period, and at least 75 percent for 2016 and beyond.

SB 100, signed in September 2018, requires that all California utilities, including independently-owned utilities, energy service providers, and community choice aggregators, supply 44 percent of retail sales from renewable resources by December 31, 2024, 50 percent of all electricity sold by December 31, 2026, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The law also requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045.

3.6.2 Discussion

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

Less than significant. Implementation of the program would result in the construction of improvements to the City's existing pedestrian, bicycle, and transit network within existing roadway rights-of-way. Certain VMT-reducing projects would result in the consumption of energy resources during operations, including energy used to power new pedestrian signals; rapid rectangular flashing beacons, pedestrian hybrid beacons, or other pedestrian activated crossing signals; and lighting and digital messaging signs at bus stops. However, energy consumption associated with operation of these features would be minor. Alternatively, these features could be powered by small on-site solar panels. Additionally, VMT-reducing projects would benefit from various State laws and requirements related to increasing the use of renewable energy and using energy more efficiently, such as SB X1-2 and SB 100 requirements to increase the amount of electricity generated from renewable and carbon-free energy sources. Furthermore, these VMT-reducing projects are intended to reduce vehicle trips, with the co-benefit of reducing transportation-related energy consumption and reliance on fossil fuels. Therefore, VMT-reducing projects which have a beneficial impact on energy resources.

Construction activities for VMT-reducing projects would require the consumption of energy resources such as electricity, fuels, and non-renewable resources. However, these types of projects would not involve large amounts of labor or extensive use of construction equipment. Some worker trips and construction equipment may be required during installation of these improvements, resulting in the short-term consumption of diesel fuel and gasoline. Standard BMPs would discourage unnecessary idling and the operation of poorly maintained equipment during construction. Construction-related energy demand would vary throughout the construction period and would cease upon completion of construction.

Based on the above discussion, the program would not result in wasteful, inefficient, or unnecessary consumption of energy during construction or operation of VMT-reducing projects. This impact is less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

Less than significant. Relevant plans that pertain to the efficient use of energy include the EAP, which identifies transportation fuels supply, demand, and infrastructure as an area of focus (CEC and CPUC 2008). As discussed in Section 3.6.2(a), implementation of VMT-reducing projects would require the minor consumption of energy resources during construction and operation; however, these projects would reduce vehicle trips, with the co-benefit of reducing transportation-related energy consumption and reliance on fossil fuels. Furthermore, VMT-reducing projects would benefit from, and would not conflict with, various State laws and requirements related to increasing the use of renewable energy and using energy more efficiently, such as SB X1-2 and SB 100 requirements to increase the amount of electricity generated from renewable and carbon-free energy sources. Therefore, VMT-reducing projects would directly support EAP goals and strategies and would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. This impact is less than significant.

3.7 GEOLOGY AND SOILS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. Geology and Soils.				
Would the program:				
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 California Geological Survey Special Publication 42.)	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), 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?	☐	☐	☒	☐

3.7.1 Environmental Setting

The city is in the foothills subprovince of the Peninsular Ranges Geomorphic Province, an area that transitions between the coastal plain to the west and the granitic highlands to the east. Elevations range from 600 to 2,000 feet above mean sea level and surface exposures in the area include rocks ranging from Mesozoic to Quaternary in age as well as recent soils and alluvial deposits of variable depth and composition (City of Escondido 2012b).

EARTHQUAKE HAZARDS

The program area is not located within an Alquist-Priolo Fault Zone. There are no known active fault lines within the program area and the potential for surface fault displacements is considered low. The program area is in a region of high seismic potential due to several active faults in the greater region, including the San Jacinto, Elsinore, and Rose Canyon Fault Zones, all of which are located outside of the program area (City of Escondido 2012b).

Liquefaction occurs primarily in saturated, loose, fine to medium-grained soils in areas where the groundwater table is generally 50 feet or less below the surface. When these sediments are shaken during an earthquake, a sudden increase in pore water pressure can cause the soils to lose strength and behave as a liquid. In the program area, liquefaction hazard areas primarily occur along natural waterways, such as Escondido Creek, Reidy Creek, and Lake Wohlford (City of Escondido 2012b).

Ground shaking from an earthquake can cause landslides or result in a boulder-rolling hazard in boulder-strewn hillside areas. The program area contains small landslide hazard areas, which are located along the city's periphery, on slopes greater than 25 percent (City of Escondido 2012b).

SOIL CHARACTERISTICS

Soils in the program area generally consist of well-drained, medium-to coarse-grained, often rocky sandy loams, commonly with clay loam substrata and underlying igneous and metamorphic bedrock. Most of the soils within the program area are prone to severe erodibility. There are also small areas of highly expansive soils within the program area, generally located around the periphery. Expansive soils are deposited in a loose, highly porous state, then harden and remain dry after deposition. Upon contact with moisture, the weak cementation between the loose soil particles softens and can result in settlement or collapse. The program area has had no known cases of lateral spreading resulting in damage to property or structures and has a very low potential of subsidence, due to underlying geologic formations that are mostly granitic (City of Escondido 2012b).

PALEONTOLOGICAL SENSITIVITY

Geologic formations within the program area include alluvial deposits from the Holocene and Pleistocene era, granitic and other intrusive crystalline rocks from the mid-Cretaceous era, and metamorphic formations of sedimentary and volcanic origin from the Mesozoic era. None of these formations are considered to have high paleontological sensitivity. Several of the formations are considered to have moderate paleontological sensitivity, including areas in the central portion of the city (City of Escondido 2012b).

3.7.2 Discussion

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 California Geological Survey Special Publication 42.)

No impact. There are no delineated Alquist-Priolo Earthquake Fault Zones within the program area. Therefore, VMT-reducing projects that would be implemented as part of the program would not cause substantial adverse effects related to the rupture of a known earthquake fault. No impact would occur.

ii) Strong seismic ground shaking?

No impact. The program area is in a region of high seismic potential due to several active faults in the greater region. VMT-reducing projects that would be implemented as part of the program would be located within developed roadway rights-of-way where existing transportation infrastructure is present. These projects do not include construction of habitable structures and thus would not exacerbate hazards to people or property from strong seismic ground shaking. No impact would occur.

iii) Seismic-related ground failure, including liquefaction?

No impact. Liquefaction hazard areas in the program area primarily occur along natural waterways. VMT-reducing projects that would be implemented as part of the program would be located within developed roadway rights-of-way where existing transportation infrastructure is present. These projects do not include construction of habitable structures and thus would not exacerbate hazards to people or property from seismic-related ground failure, including liquefaction. No impact would occur.

iv) Landslides?

No impact. The program area contains small landslide hazard areas, which are located along the periphery, on slopes greater than 25 percent. The VMT-reducing projects that would be implemented as part of the program would be located within developed roadway rights-of-way where existing transportation infrastructure is present. These projects do not include construction of habitable structures and thus would not exacerbate hazards to people or property from landslides. In addition, VMT-reducing projects would not occur on steep slopes or require substantial ground disturbing activities that could cause a landslide. No impact would occur.

b) Result in substantial soil erosion or the loss of topsoil?

Less than significant. Most of the soils within the program area are prone to severe erodibility. Thus, projects that would involve ground disturbing activities have the potential to cause soil erosion and loss of topsoil. VMT-reducing projects that would be implemented as part of the program would require minor grading, excavation, and other ground disturbance. Ground disturbing activities would generally occur in already disturbed, developed roadway rights-of-way where existing transportation infrastructure is present. VMT-reducing projects would be required to comply with the City's *Design Standards and Standard Drawings*, which specifies grading and erosion control standards (City of Escondido 2014). Additionally, VMT-reducing projects involving disturbance of one or more acres would be required to comply with a project-specific storm water pollution prevention plan (SWPPP) that complies with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order 2009-0009-DWQ). The SWPPP would identify erosion and sediment controls to substantially reduce the amount of soil disturbance, erosion, and sediment transport into receiving waters during construction. Refer to Section 3.10, "Hydrology and Water Quality," for additional information. Through compliance with applicable requirements, VMT-reducing projects that would be implemented as part of the program would not result in substantial soil erosion or the loss of topsoil. This impact is less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

No impact. Landslide hazards and liquefaction are discussed in Sections 3.7.2(a)(iii) and (iv). The program area has had no known cases of lateral spreading resulting in damage to property or structures and has a very low potential of subsidence (City of Escondido 2012b). Furthermore, VMT-reducing projects that would be implemented as part of the program do not include construction of habitable structures that could be affected by lateral spreading, subsidence, or collapse. No impact would occur.

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

No impact. Expansive soils are known to occur within the program area; however, VMT-reducing projects that would be implemented as part of the program do not include construction of habitable structures that could be affected by expansive soils. Therefore, VMT-reducing projects would not create substantial risks to life or property from expansive soils. No impact would occur.

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?

No impact. VMT-reducing projects that would be implemented as part of the program do not include installation of any septic tanks or alternative waste water disposal systems. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than significant. The central portion of the city includes areas that are underlain by geologic formations of moderate paleontological sensitivity. Thus, projects that involve ground disturbing activities have the potential to disturb unique paleontological resources. VMT-reducing projects that would be implemented as part of the program would involve minor grading, excavation, and other ground disturbance during construction. Ground disturbance would generally be limited to shallow depths, comprised of artificial fill or previously disturbed soils, within developed roadway rights-of-way. Furthermore, VMT-reducing projects would be consistent with General Plan Goal 5 and Policies 5.2 of the Resource Conservation Chapter, which call for the preservation of important cultural and paleontological resources that contribute to the unique identity and character of Escondido. Policy 5.2 encourages the preservation of significant cultural and paleontological resources listed on the national, state, or local registers through maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process (City of Escondido 2012a). For all the foregoing reasons, the program would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. This impact is less than significant.

3.8 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. Greenhouse Gas Emissions.				
Would the program:				
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?	☐	☐	☒	☐

3.8.1 Environmental Setting

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. GHGs are responsible for "trapping" solar radiation in the earth's atmosphere, a phenomenon known as the greenhouse effect. Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Human-caused emissions of these GHGs in excess of natural ambient concentrations are believed responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. Emissions of GHGs contributing to global climate change are attributable, in large part, to human activities associated with on-road and off-road transportation, industrial/manufacturing, electricity generation by utilities and consumption by end users, residential and commercial on-site fuel usage, and agriculture and forestry. Emissions of CO_2 are largely byproducts of fossil fuel combustion.

The quantity of GHGs in the atmosphere that ultimately result in climate change is not precisely known, but is enormous; no single project alone would measurably contribute to an incremental change in the global average temperature, or to global, local, or micro climates. From the standpoint of the CEQA, GHG impacts relative to global climate change are inherently cumulative.

Although there is strong scientific consensus that global climate change is occurring and is influenced by human activity, there is less certainty as to the timing, severity, and potential consequences of the climate phenomena. Scientists have identified several ways in which global climate change could alter the physical environment in California, including:

- increased average temperatures;
- modifications to the timing, amount, and form (rain vs. snow) of precipitation;
- changes in the timing and amount of runoff;
- reduced water supply;
- deterioration of water quality; and
- elevated sea level.

CLIMATE CHANGE LAWS, REGULATIONS, AND PLANS

Assembly Bill 32, the California Global Warming Solutions Act of 2006

In September 2006, the California Global Warming Solutions Act of 2006, Assembly Bill (AB) 32, was signed into law. AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 also requires that (a) the statewide greenhouse gas emissions limit remain in effect unless otherwise amended or repealed; (b) the statewide greenhouse gas emissions limit continue in existence and be used to maintain and continue reductions in emissions of greenhouse gases beyond 2020; and (c) [CARB] shall make recommendations to the Governor and the Legislature on how to continue reductions of greenhouse gas emissions beyond 2020 [California Health and Safety Code, Division 25.5, Part 3, Section 38551]. For the purposes of AB 32 and other legislation in California, GHGs are expressed in carbon dioxide equivalent (CO_2e). CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

Senate Bill 32 and Assembly Bill 197 of 2016

In August 2016, Governor Brown signed SB 32 and AB 197, which serve to extend California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a Statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EOs S-3-05 and B-30-15 of 80 percent below 1990 emissions levels by 2050.

Climate Change Scoping Plan and Updates

In December 2008, CARB adopted its first version of its Climate Change Scoping Plan, which contained the main strategies California will implement to achieve the mandate of AB 32 (2006) to reduce statewide GHG emissions to 1990 levels by 2020. In May 2014, CARB released and subsequently adopted the First Update to the Climate Change Scoping Plan to identify the next steps in reaching the goals of AB 32 (2006) and evaluate the progress made between 2000 and 2012 (CARB 2014). After releasing multiple versions of proposed updates in 2017, CARB adopted the next version titled California's 2017 Climate Change Scoping Plan (2017 Scoping Plan) in December of that same year (CARB 2017). The 2017 Scoping Plan indicates that California is on track to achieve the 2020 statewide GHG target mandated by AB 32 of 2006 (CARB 2017). It also lays out the framework for achieving the mandate of SB 32 of 2016 to reduce statewide GHG emissions to at least 40 percent below 1990 levels by the end of 2030 (CARB 2017). The 2017 Scoping Plan identifies the GHG reductions needed by each emissions sector.

The 2017 Scoping Plan also identifies how GHGs associated with proposed projects could be evaluated under CEQA (CARB 2017:101-102). Specifically, it states that achieving "no net increase" in GHG emissions is an appropriate overall objective of projects evaluated under CEQA if conformity with an applicable local GHG reduction plan cannot be demonstrated. CARB recognizes that it may not be appropriate or feasible for every development project to mitigate its GHG emissions to zero and that an increase in GHG emissions because of a project may not necessarily imply a substantial contribution to the cumulatively significant environmental impact of climate change.

The Draft 2022 Scoping Plan Update aims to assess progress towards achieving the Senate Bill 32 2030 target and lay out a path to achieve carbon neutrality by no later than 2045. The Draft 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities (CARB 2022).

Executive Order B-30-15

On April 20, 2015, Executive Order (EO) B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG reduction targets with those of leading international governments such as

the 28-nation European Union, which adopted the same target in October 2014. California has met the target of reducing GHG emissions to 1990 levels by 2020, as established in the California Global Warming Solutions Act of 2006 (Assembly Bill 32, discussed above). California's new emission reduction target of 40 percent below 1990 levels by 2030 sets the next interim step in the State's continuing efforts to pursue the long-term target expressed under EO S-3-05 to reach the ultimate goal of reducing emissions 80 percent below 1990 levels by 2050. This target is in line with the scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius, the warming threshold at which major climate disruptions are projected, such as super droughts and rising sea levels.

San Diego County Air Pollution Control District

SDAPCD administers EPA's Prevention of Significant Deterioration and Title V GHG Tailoring Rule through Rule 20.3(d)(3) and Regulation XIV (Title V Operating Permits), respectively. SDAPCD has not developed thresholds of significance or guidance for analysis of GHGs under CEQA.

Escondido Climate Action Plan

The City's CAP provides a roadmap for reducing GHG emissions through the implementation of various strategies, goals, actions and supporting measures. The CAP primarily focuses on reducing GHG emissions by 2020, 2030, and 2035, consistent with State mandates including SB 32 and the 2017 Scoping Plan, and the City's General Plan horizon year of 2035. The following nine strategies for reducing citywide GHG emissions are identified in the CAP: (1) increase the use of zero-emission or alternative fuel vehicles, (2) reduce fossil fuel use, (3) reduce VMT, (4) increase building energy efficiency, (5) increase renewable and zero-carbon energy, (6) increase water efficiency, (7) diversify local water supply, (8) reduce and recycle solid waste, and (9) carbon sequestration and land conservation. Through implementation of the CAP, the City intends to implement 31 GHG reduction measures to achieve emission reductions from transportation, energy consumption, water and wastewater, solid waste, and carbon sequestration. Implementation of all 31 GHG reduction measures is projected to result in a reduction of approximately 499,000 metric tons of CO_2e in 2030 and 456,000 metric tons of CO_2e in 2035 (City of Escondido 2021).

3.8.2 Discussion

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

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These VMT-reducing projects would not introduce new land uses or human activities that would result in substantial sources of GHG emissions. Rather, these projects are intended to reduce vehicle trips, with the co-benefit of reducing GHG emissions associated with on-road transportation. Therefore, VMT-reducing projects would have a beneficial impact related to greenhouse gas emissions.

Construction activities for VMT-reducing projects would generate GHG emissions from the operation of construction equipment, construction worker vehicle trips, and truck hauling trips. However, these types of projects would not involve large amounts of labor or extensive use of construction equipment. Standard BMPs would discourage unnecessary idling and the operation of poorly maintained equipment during construction. Construction-related GHG emissions would vary throughout the construction period and would cease upon completion of construction. Any temporary GHG emissions would be offset by the by the overall net benefit of GHG emission reductions after implementation of the program. Based on the above discussion, implementation of VMT-reducing projects under the program would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. This impact is less than significant.

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

Less than significant. Based on Appendix G of the CEQA Guidelines, a project would have a significant impact if it would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Applicable plans, policies, or regulations include Statewide GHG emission targets established by AB 32, SB 32, and EO S-3-05; the most recently adopted 2017 Scoping Plan; and the City's CAP (City of Escondido 2021) and General Plan (City of Escondido 2012b).

As discussed in Section 3.8.2(a), VMT-reducing projects are intended to reduce vehicle trips, with the co-benefit of reducing GHG emissions associated with on-road transportation. Temporary, construction-related GHG emissions would be offset by the by the overall net benefit of GHG emission reductions after implementation of the program. Therefore, VMT-reducing projects would help the City meet Statewide GHG reduction targets established by AB 32, SB 32, and EO S-3-05; the most recently adopted 2017 Scoping Plan.

As stated in Section 2.5, "Program Objectives," one of the objectives of the program is to reduce Citywide VMT to help meet GHG emission reduction targets identified in the City's CAP. Therefore, VMT-reducing projects would support CAP measures to reduce vehicle trips and VMT through improving pedestrian infrastructure near schools (Measure T-3.3), installing new or improving existing bicycle lanes (Measure T-3.5), and encouraging transit ridership (Measure T-3.8). VMT-reducing projects would also be consistent with policies in the Mobility and Infrastructure Element of the City's General Plan that are intended to reduce automobile trips and associated GHG emissions. Applicable policies in the Mobility and Infrastructure Element that would contribute to reductions in GHG emissions include policies that promote complete streets (Policy 2.1 through 2.9) and improvements to the pedestrian network (Policy 3.1 through 3.10), bicycle network (Policy 4.1 through 4.8), and transit system (Policy 5.1 through 5.11). Additionally, the element includes policies to manage transportation demand (Policy 6.1 through 6.3), enhance the existing street network (Policy 7.1 through 7.11), and implement traffic calming measures (Policy 9.1 through 9.3). As described above, the GHG reductions that would be achieved from implementation of VMT-reducing projects would offset the temporary GHG emissions from construction of these projects.

Based on the above discussion, implementation of VMT-reducing projects under the program would support rather than conflict with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions. This impact is less than significant.

3.9 HAZARDS AND HAZARDOUS MATERIALS

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

3.9.1 Environmental Setting

This section describes the environmental setting and impacts related to hazards and hazardous materials. For the purposes of this analysis, the term “hazards” refers to risk associated with such issues as fires, explosions, exposure to hazardous materials, and interference with emergency response plans. The term “hazardous material” is defined in different ways for different regulatory programs. For this analysis, a “hazardous material” is defined by the California Health and Safety Code, Section 25501 as a material that “because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.”

"Hazardous waste" is a subset of hazardous materials. For this analysis, "hazardous waste" is defined by the California Health and Safety Code, Section 25517, and in the California Code of Regulations, Title 22, Section 66261.2 as a solid waste that "because of its quantity, concentration, or physical or chemical, or infectious characteristics, may— (A) cause, or significantly contribute to an increase in mortality or an increase in serious illness, or (B) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed." California Government Code section 65962.5 requires the California Environmental Protection Agency to compile, maintain, and updated specified lists of hazardous material release sites. The program area contains sites listed on regulatory databases, including leaking underground storage tank cleanup sites and cleanup program sites listed on State Water Resources Control Board's (SWRCB) GeoTracker database, as well as sites formerly or presently used for agriculture and petroleum storage (SWRCB 2022).

There are no public airports or private airstrips within the city. The nearest airport is the McClellan-Palomar Airport locate approximately 12 miles west of the city.

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped Fire Hazard Severity Zones (FHSZs) for the entire State. FHSZs are based on an evaluation of fuels, fire history, terrain, housing density, and occurrence of severe fire weather and are intended to identify areas where urban fires could result in catastrophic losses. FHSZs are categorized as: Moderate, High, and Very High. According to CAL FIRE's Fire Resource Assessment Program FHSZ Geographic Information System data, several areas around the perimeter of the city are categorized as very high FHSZs (CAL FIRE 2009).

3.9.2 Discussion

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

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would involve the use of hazardous materials during construction and routine maintenance. However, these projects would be required to comply with relevant federal, State, and local regulations regarding the safe use, transportation, and disposal of hazardous materials as well as ensuring the reduction of the potential for humans or the environment to be affected by an accidental release of hazardous materials. Regulations that would be required of those transporting, using or disposing of hazardous materials include the Resource Conservation and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Transportation Act; CCR Titles 22 and 27; and the California Fire Code, adopted by reference in EMC Section 11-15. Therefore, implementation of VMT-reducing projects under the program would not create a significant hazard through the routine transport, use, or disposal of hazardous materials. This impact is less than significant.

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

Less than significant. As discussed in Section 3.9.2(a), VMT-reducing projects would be required to comply with relevant federal, State, and local regulations that require strict adherence to guidelines regarding the safe use, transportation, and disposal of hazardous materials. Compliance with these regulations would reduce the potential for humans or the environment to be affected by an accidental release of hazardous materials. Enforcement of these regulatory standards would ensure that construction and routine maintenance of VMT-reducing projects would not create a significant hazard through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment. This impact is less than significant.

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

Less than significant. As discussed in Section 3.9.2(a), VMT-reducing projects that would be implemented as part of the program would be required to comply with relevant federal, State, and local regulations that require strict adherence to guidelines regarding the safe use, transportation, and disposal of hazardous materials. Compliance with these regulations would reduce the potential for humans or the environment to be affected by an accidental release of hazardous materials. Because such laws are established to be protective of human health and the environment, compliance with applicable regulations is sufficient to ensure that any hazardous materials used during construction or routine maintenance of VMT-reducing projects would not result in hazardous emissions within one-quarter mile of an existing or proposed school. This impact is less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than significant. Sites with the potential to contain soil and groundwater contamination are located throughout the city. VMT-reducing projects that would be implemented as part of the program could potentially be located on a hazardous materials site. Ground disturbing activities, such as grading and excavation, on or near hazardous materials sites could result in the release of contaminants into the environment. However, compliance with General Plan policies would protect the public and the environment from the release of contaminants from hazardous materials sites. Specifically, General Plan Policy 8.10 of the Community Protection Chapter directs the City to require project proponents of projects in known contamination areas to conduct comprehensive soil and groundwater contamination assessments, in accordance with applicable regulations. If contamination exceeds regulatory levels, the City requires project proponent to undertake remediation procedures consistent with county, regional, and State regulations prior to grading and development of the project site. For this reason, implementation of VMT-reducing projects under the program would not create a significant hazard to the public or the environment. This impact is less than significant.

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

No impact. VMT-reducing projects that would be implemented as part of the program would not result in new or relocated residential land uses, new types of noise-sensitive receptors, or new places of permanent employment where residents or workers could be exposed to a safety hazard or excessive noise. The nearest airport, McClellan-Palomar Airport, is approximately 12 miles west of the city. Therefore, implementation of VMT-reducing projects under the program would not expose residents or workers to a safety hazard or excessive noise levels. No impact would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would occur within roadway rights-of-way and could alter existing roadways that serve as emergency access routes, which would have the potential to impair adopted emergency response and evacuation plans. All improvements within roadway rights-of-way would be designed in compliance with the California Fire Code, which is adopted by reference in the Escondido Fire Code. The California Fire Code requires the width of an unobstructed roadway to measure no less than 24 feet in order to provide adequate access for fire and emergency responders. Additionally, improvements within roadway rights-of-way would be required to comply with the City's *Design Standards and Standard Drawings*, which require emergency access roads be designed and constructed to the requirements of City Engineer and Fire

Marshal (City of Escondido 2014). Compliance with applicable codes and design standards would ensure that adequate access is provided for fire and emergency responders during operations of VMT-reducing projects.

Construction activities for VMT-reducing projects would occur within roadway rights-of-way and may require temporary lane closures or result in other traffic disruptions. Encroachment permits from the City would be required for all work within public rights-of-way. As a requirement of encroachment permit approval, project proponents would be required to develop a traffic control plan that meets the requirements of the most current California Manual on Uniform Traffic Control Devices (Caltrans 2021) and the latest edition of the Standard Specifications for Public Works Construction. Compliance with the encroachment permit and traffic control plan would ensure that adequate access is provided for fire and emergency responders for the duration of construction activities. Therefore, implementation of VMT-reducing projects under the program would not impair an adopted emergency response plan or emergency evacuation plan. This impact is less than significant.

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

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would not include the construction of new housing or other structures and would not introduce new occupants that could be exposed to risk of loss, injury, or death involving wildland fires. Furthermore, VMT-reducing projects would be primarily within developed roadway rights-of-way where wildfire risk is low.

VMT-reducing projects could require the use of construction vehicles and equipment within areas categorized as very high FHSZs. The temporary and periodic use of construction vehicles and equipment within a very high FHSZ has the potential to increase the risk of an accidental fire ignition. However, construction activities associated with their implementation would occur within developed roadway rights-of-way where wildfire risk is low. In addition, enforcement of the California Fire Code would require the implementation of fire safety measures during construction. Safety measures would include prohibiting smoking except in approved areas and ensuring proper use of motorized equipment so that exhausts do not discharge against combustible material and refueling would not occur while in equipment was in operation. Therefore, implementation of VMT-reducing projects under the program would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. This impact is less than significant.

3.10 HYDROLOGY AND WATER QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. Hydrology and Water Quality.				
Would the program:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial on- or offsite erosion or siltation;	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

3.10.1 Environmental Setting

The city is located within the South Coast Groundwater Hydrologic Region and overlies portions of the Escondido Valley Groundwater Basin and the San Pasqual Valley Groundwater Basin (DWR 2022). The Escondido Valley Groundwater Basin underlies the northern area of the city. This groundwater basin consists of a northeast trending valley drained by Escondido Creek. The San Pasqual Groundwater Basin covers portions of the southeastern area of the city. This groundwater basin underlies San Pasqual Valley and Cloverdale, Rockwood, and Bandy Canyons (City of Escondido 2012b).

The city is located within the San Diego Hydrologic Region and includes two watersheds: San Dieguito River Watershed and Carlsbad Watershed. San Dieguito River Watershed covers 221,307 acres and consists of one

hydrologic unit (HU) (San Dieguito) and the following five hydrologic areas (HAs): Solana Beach, Hodges, San Pasqual, Santa Maria Valley, and Santa Ysabel. This watershed contains the San Dieguito River and its tributaries, along with Santa Ysabel and Santa Maria Creeks. San Dieguito River Watershed also contains the following reservoirs: Hodges Reservoir, Lake Ramona, Lake Poway, Sutherland Reservoir, Olivenhain Reservoir, and the San Dieguito Reservoir. Carlsbad Watershed covers 135,322 acres and includes one HU (Carlsbad) and the following six HAs: Loma Alta, Buena Vista Creek, Agua Hedionda, Encinas, San Marcos, and Escondido Creek. This watershed also contains five coastal lagoons (Loma Alta Slough, Buena Vista Lagoon, Agua Hedionda Lagoon, Batiquitos Lagoon, and San Elijo Lagoon) and two small reservoirs (Lake Dixon Lake and Lake Wohlford) (City of Escondido 2012b).

Areas within the city that would be subject to flooding during a 100-year storm event include: northern portions of Reidy Creek north of Rincon Avenue; an area alongside Escondido Creek west of Hale Avenue; along Kit Carson Park Creek north of Via Rancho Parkway; an area straddling Midway Drive north of the Escondido Creek channel; and an area straddling Valley Parkway between Ash Street and Citrus Avenue (City of Escondido 2012b).

3.10.2 Discussion

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than significant. The Water Quality Control Plan for the San Diego Basin (Basin Plan), adopted by the San Diego Regional Water Quality Control Board (RWQCB), establishes water quality objectives for ground and surface waters in the San Diego region. The purpose of the Basin Plan is to preserve and enhance water quality and protect the beneficial uses of regional waters. The RWQCB also issues waste discharge requirements to ensure that wastewater is not discharged in a manner that would cause an exceedance of applicable water quality objectives or adversely affect beneficial uses designated in the Basin Plan.

VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These types of projects would not create substantial new sources of pollutants and would not involve the discharge of wastewater. The activities involved in constructing VMT-reducing projects would require minor grading, excavation, and other ground disturbance. Ground-disturbing activities, could, depending on their location, cause soil erosion and contaminate nearby surface water. However, VMT-reducing projects would be required to comply with the City's *Design Standards and Standard Drawings* (City of Escondido 2014) and EMC Article 55, which specify grading and erosion control standards. For VMT-reducing projects that involve one or more acres of ground disturbance, applicants would be required to submit a Notice of Intent to SWRCB to obtain approval to carry out construction activities under the NPDES Construction General Permit (Order 2009-0009-DWQ). Compliance with the Construction General Permit requires the applicant to develop a project-specific SWPPP, which would identify source control, site design, and treatment-control BMPs to reduce stormwater runoff volumes and pollutants leaving the site. Erosion and sediment controls identified in the SWPPP would substantially reduce the amount of soil disturbance, erosion, and sediment transport into receiving waters, and pollutants in site runoff during construction. Through compliance with all applicable regulations and permits, implementation of VMT-reducing projects under the program would not violate any water quality standards or waste discharge requirements established by the San Diego RWQCB or otherwise substantially degrade surface or groundwater quality. This impact is less than significant.

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

Less than significant. VMT-reducing projects would not involve development of new land uses (e.g., residential, commercial, or industrial) and would not induce population growth in the area that would increase water demand. Pedestrian network improvements and bus stop upgrades may include the installation of new landscaping, which would increase water demands compared to existing conditions. However, landscaping would be limited to water-

efficient varieties, such as plants that are native to the San Diego region or are adapted to a hot dry summer and cool winter climate, as required by EMC Article 62, "Water Efficient Landscape Regulations." Construction of VMT-reducing projects would involve ground disturbing activities, including grading and excavation, which could require the use of water for dust abatement as needed. These activities would be temporary and intermittent and would not involve the substantial use of existing groundwater supplies. Therefore, VMT-reducing projects would not substantially decrease groundwater supplies.

VMT-reducing projects would primarily occur in areas developed with impervious surfaces that do not provide for substantial groundwater recharge. Additionally, VMT-reducing projects would result in little to no changes in existing impervious surfaces throughout the program area. Therefore, VMT-reducing projects would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Based on the above discussion, the program would not decrease groundwater supplies or interfere with groundwater recharge. This impact is less than significant.

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

i) Result in substantial on- or offsite erosion or siltation;

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?

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. VMT-reducing projects would not be located within existing watercourses. Rather, these projects would occur within roadway rights-of-way in areas that are primarily developed with existing transportation infrastructure (e.g., paved roadways, sidewalks, parking lots) and urban development (e.g., buildings, pavement, ornamental landscaping). Most VMT-reducing projects would involve improvements to the existing roadway network and would not result in a net increase in impervious surfaces. However, VMT-reducing projects that would involve the addition of new impervious surfaces, such as the addition of new sidewalks or bicycle facilities, would be required to comply with the drainage design standards specified in the City's *Design Standards and Standard Drawings* (City of Escondido 2014). As applicable, drainage design would be subject to the requirements of the City's adopted *Standard Urban Stormwater Mitigation Plan Requirements for Development Projects* (SUSMP) and the latest *Drainage Master Plan*, the Federal Emergency Management Agency's Flood Insurance Rate Maps, the City Floodplain Ordinance, and the City engineer. Compliance with drainage design requirements would ensure that drainage patterns would not be substantially altered from the addition of new impervious surfaces.

The potential for erosion or siltation would be minimal because project sites would be developed with hardscape, landscaping, and appropriate drainage infrastructure. The relatively minor addition of impervious surfaces would not substantially increase surface runoff. The existing municipal storm drain system would have adequate capacity to accommodate these minor increases in surface runoff. Adequate drainage would reduce the potential for on- and off-site flooding. Additionally, VMT-reducing projects located within flood hazard areas would be subject to development permit requirements and EMC Section 6-474, which establishes standards for development in flood hazard areas. Construction activities would comply with grading and erosion control standards described in Section

3.10.2(a), including EMC Article 55 and the NPDES Construction General Permit. Compliance with applicable standards would reduce the potential for construction activities to result in substantial erosion and siltation, polluted surface runoff, and flooding.

Based on the above discussion, implementation of VMT-reducing projects under the program would not substantially alter drainage patterns in a manner that would (i) result in substantial erosion or siltation, (ii) increase surface runoff and result in flooding, (iii) contribute runoff water that would exceed the capacity of existing stormwater systems or provide substantial additional sources of polluted runoff, or (iv) impede or redirect flood flows. This impact is less than significant.

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

No impact. Flood hazard areas within the city are located along Reidy Creek, Escondido Creek, and Kit Carson Park Creek. VMT-reducing projects that would be implemented as part of the program would not result in the construction of new structures or the storage of materials and equipment on-site where they could be inundated by tsunami, floodwater, or seiche. Additionally, applicants would be required to obtain a development permit prior to construction of any VMT-reducing projects located within an area of special flood hazard. VMT-reducing projects would also be required to comply with EMC Section 6-474, which establishes standards for construction in all flood hazard areas. In addition, as described in Section 3.10.2(a), VMT-reducing projects involving disturbance of one or more acres would be subject to the requirements of the NPDES Construction General Permit. Applicants would be required to develop a project-specific SWPPP, which would identify BMPs to reduce the potential for pollutants in surface runoff from leaving the project site. Therefore, implementation of VMT-reducing projects under the program would not risk release of pollutants due to project inundation. No impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than significant. The potential for VMT-reducing projects that would be implemented as part of the program to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan is described in the following sections.

Water Quality Control Plan

As discussed in Section 3.10.2(a), the Basin Plan is the applicable water quality control plan for the San Diego region. VMT-reducing projects would be required to comply with the City's *Design Standards and Standard Drawings* and EMC Article 55, which specify grading and erosion control standards to avoid or reduce excessive erosion what could impact water quality. In addition, construction projects that disturb one or more acres would be required to prepare a SWPPP that demonstrates conformance with the NPDES Construction General Permit. The SWPPP would identify applicable BMPs that would need to be implemented to reduce the amount of pollutants and surface runoff leaving the project site. Through compliance with all applicable regulations and permits, implementation of VMT-reducing projects under the program would not conflict with or obstruct implementation of the Basin Plan for the San Diego region.

Sustainable Groundwater Management Plan

Under the Sustainable Groundwater Management Act, groundwater basins that are classified by the California Department of Water Resources (DWR) as medium- and high-priority basins are required to develop groundwater sustainability plans (GSP) and manage groundwater for long-term sustainability. The program area overlies portions of the Escondido Valley Groundwater Basin. A GSP has not been adopted for the Escondido Valley Groundwater Basin because this basin is classified by DWR as a very low priority basin. The program area also overlies portions of the San Pasqual Valley Groundwater Basin, which is classified by DWR as a medium priority basin. The adopted GSP for this basin is the San Pasqual Basin Groundwater Management Plan (GMP), which serves as a framework for establishing basin management objectives and related actions to improve groundwater resource management in San Pasqual Valley. However, the GMP only applies to land within the jurisdiction of the City of San Diego (City of

Escondido 2012b). Therefore, the City is not subject to the requirements of a sustainable groundwater management plan.

Regardless, as discussed in Section 3.10.2(b), VMT-reducing projects would not involve development of new land uses (e.g., residential, commercial, or industrial) and would not induce population growth in the area that would increase water demand. The minor water needs for dust abatement during construction and for landscaping would not require the substantial use of existing groundwater supplies.

Summary

Based on the above discussion, implementation of VMT-reducing projects under the program would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This impact is less than significant.

3.11 LAND USE AND PLANNING

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

3.11.1 Environmental Setting

Development within the program area is concentrated within the valley floor of Escondido, where the city's urbanized core surrounds the downtown area. Based on an inventory conducted for the City's updated General Plan land use categories, single and multifamily residential uses represented the dominant land uses, occupying 36,145 acres and 71 percent of the General Plan area. Public land and open space are the second largest land uses, occupying 7,686 acres and 15 percent of the General Plan area (City of Escondido 2012a). Open space areas are located around the perimeter of the program area, with larger areas in the north and east of the City.

Existing land use designations in the program area include residential land uses that range from low density rural to high-density urban, several types of commercial and industrial land uses with varying development intensity, office, public land uses, and specific planning areas (City of Escondido 2012b).

3.11.2 Discussion

a) Physically divide an established community?

Less than significant. Division of an established community could result from the construction of a physical feature, such as a wall, interstate highway, airport, roadway, or railroad tracks. Additionally, division of an established community could result from the removal of a means of access, such as a local road or bridge, that could impair mobility or constrain travel within an existing community or between a community and outlying areas.

VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network within developed roadway rights-of-way. These projects would generally be located within a 0.5-mile travel distance of a proposed development project and in proximity to key destinations (e.g., existing parks, schools, community centers, or shopping centers). As such, these projects are intended to improve, rather than impair, community connectivity and access throughout the city. Therefore, implementation of VMT-reducing projects under the program would not physically divide an established community. This impact is less than significant.

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

No impact. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network within developed roadway rights-of-way. These projects would not change existing land uses and would comply with all applicable zoning regulations. Furthermore, as

discussed in Section 3.3, "Air Quality," Section 3.8, "Greenhouse Gas Emissions," and Section 3.17, "Transportation," VMT-reducing projects would be consistent with General Plan policies intended to reduce vehicle trips and associated air pollutant and greenhouse gas emissions, which would have beneficial environmental effects. Therefore, implementation of VMT-reducing projects under the program would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

3.12 MINERAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Mineral Resources.				
Would the program:				
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?	☐	☐	☐	☒

3.12.1 Environmental Setting

The DOC Division of Mines and Geology classifies land into mineral resource zones (MRZs), according to the land's known or inferred mineral resource potential. Areas classified as MRZ-2 are underlain by mineral deposits where geologic information shows that significant measured or indicated resources are present. One area designated MRZ-2 exists within the program area boundary. The area designated MRZ-2 is an alluvial fan deposit located in the southeastern portion of the city. It is almost entirely located within the city of San Diego, except a small segment along the eastern edge of the city of Escondido along Rockwood Road (DOC 1982, City of Escondido 2012b).

There are currently no permitted mines or active extraction sites within the city of Escondido. The City's General Plan does not include a designation for mineral resources or extraction operations. Mining and extraction operations are not listed as a permitted or conditionally permitted use for any zone in the City's Zoning Ordinance (City of Escondido 2012b).

3.12.2 Discussion

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?

No impact. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. The locations of VMT-reducing projects are identified in Table 2-1; however, applicants may propose VMT-reducing projects at other locations throughout Escondido. Applicant-proposed locations for VMT-reducing projects would generally be within a 0.5-mile travel distance of a proposed development project and in proximity to key destinations (e.g., existing parks, schools, community centers, or shopping centers). Additionally, VMT-reducing projects would occur in already disturbed, developed areas within existing roadway rights-of-way where mineral resources are not present. Therefore, implementation of VMT-reducing projects under the program would not result in the loss of availability of a known mineral resource of value to the region and the state. No impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No impact. The City's General Plan and zoning ordinance does not include any designations for mineral resources or extraction operations and does not identify any locally important mineral resource recovery sites. Therefore, implementation of VMT-reducing projects under the program would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur.

3.13 NOISE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII.Noise.				
Would the program 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, or a substantial temporary or permanent increase in noise levels above existing ambient levels that could result in an adverse effect on humans?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

3.13.1 Environmental Setting

Sound is a mechanical form of radiant energy, transmitted by a pressure wave through a solid, liquid, or gaseous medium. Sound that is loud, disagreeable, unexpected, or unwanted is generally defined as noise. Noise is typically expressed in decibels (dB), which is a common measurement of sound energy. Definitions of acoustical terms used in this section are provided in Table 3-3.

Table 3-3 Acoustic Term Definitions

Term	Definition
Noise	Noise is generally defined as sound that is loud, disagreeable, unexpected, or unwanted.
Decibel (dB)	Sound levels are measured using the decibel scale, developed to relate to the range of human hearing. A decibel is logarithmic; it does not follow normal algebraic methods and cannot be directly summed. For example, a 65-dB source of sound, such as a truck, when joined by another 65-dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by 3 dB). A sound level increase of 10 dB corresponds to 10 times the acoustical energy, and an increase of 20 dB equates to a 100-fold increase in acoustical energy.
Equivalent Noise Level (L_{eq})	The average noise level during a specified time period; that is, the equivalent steady-state noise level in a stated period of time that would contain the same acoustic energy as the time-varying noise level during the same period (i.e., average noise level).
Maximum Noise Level (L_{max})	The highest instantaneous noise level during a specified time period.
Community Noise Equivalent Level (CNEL)	Similar to the L_{dn} described above with an additional 5-dB penalty applied during the noise-sensitive hours from 7 p.m. to 10 p.m., which are typically reserved for evening relaxation activities.

Source: Caltrans 2013.

Noise can be generated by many sources, including mobile sources such as automobiles, trucks, and airplanes and stationary sources such as activity at construction sites, machinery, and commercial and industrial operations. As sound travels through the atmosphere from the source to the receiver, noise levels attenuate (i.e., decrease) depending on ground absorption characteristics, atmospheric conditions, and the presence of physical barriers.

In typical noisy environments, changes in noise of 1–2 dB are generally not perceptible. However, it is widely accepted that people are able to begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dB increase is generally perceived as a distinctly noticeable increase, and a 10-dB increase is generally perceived as a doubling of loudness. Therefore, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dB increase in sound would generally be perceived as barely detectable (Caltrans 2013).

GROUND VIBRATION

Vibration is the periodic oscillation of a medium or object with respect to a given reference point. Sources of vibration include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) and those introduced by human activity (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient in nature, such as explosions.

Vibration amplitudes are commonly expressed in peak particle velocity (PPV) or root-mean-square (RMS) vibration velocity. PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is typically used in the monitoring of transient and impact vibration and has been found to correlate well to the stresses experienced by buildings (FTA 2018; Caltrans 2020). PPV and RMS vibration velocity are normally described in inches per second. Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response. It takes some time for the human body to respond to vibration signals. In a sense, the human body responds to average vibration amplitude. The RMS of a signal is the average of the squared amplitude of the signal, typically calculated over a 1-second period. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to compress the range of numbers required to describe vibration (FTA 2018).

The typical background vibration-velocity level in residential areas is typically 50 VdB or lower and the threshold of perception for humans is approximately 65 VdB. A vibration level of 85 VdB in a residence can result in strong annoyance and a vibration level of 100 VdB is the threshold for risk of minor cosmetic damage for fragile buildings. Typical outdoor sources of perceptible ground vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground vibration is rarely perceptible. Constant or transient vibrations can weaken structures, crack facades, and disturb occupants (FTA 2018).

EXSTING SENSITIVE RECEPTORS

Noise- and vibration-sensitive land uses are generally considered to include those uses for which noise exposure could result in health-related risks to individuals, as well as uses for which quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are also considered sensitive to increases in exterior noise levels. Schools, health care facilities, places of worship, hotels, libraries, and other places where low interior noise levels are essential are also considered noise- and vibration-sensitive land uses.

EXISTING NOISE SOURCES

Major roadway sources of noise within the city are vehicular traffic along major roadways (i.e., SR 78 and I-15) and rail traffic along the North County Transit District (NCTD) SPRINTER rail line. The City's General Plan EIR shows existing noise contours around major roads and highways throughout the city. The roadways that generate the highest noise levels in the city include I-15 (78-81 dBA CNEL), SR 78 from Nordahl Road to the end of the freeway (76-79 dBA

CNEL), Bear Valley Parkway from Beethoven Drive to San Pasqual Valley Road (75-76 dBA CNEL), Centre City Parkway from South Iris Lane to the I-15 Southbound (SB) Ramps (74-76 dBA CNEL), Del Dios Road from Via Rancho Parkway to Mount Israel Road (77 dBA CNEL), Valley Parkway from Auto Park Way to the I-15 northbound (NB) Ramps (76 dBA CNEL), and Via Rancho Parkway from Quiet Hills Road to Beethoven Drive (72-77 dBA CNEL) (City of Escondido 2012b).

The McClellan-Palomar Airport is approximately 12 miles west of the city. According to the Airport Land Use Compatibility Plan, the facility generated less than 60 dBA CNEL within Escondido's airspace. In addition, noise is generated from air ambulances that provide unscheduled emergency patient deliveries to the Palomar-Pomerado Hospital by helicopter. However, due to the variability of flight schedules and flight patterns there are no laws or regulations regarding specific flight patterns (San Diego County ALUC 2011, City of Escondido 2012a).

Commercial and industrial land uses are present along major transportation corridors in the urban core of the city. Depending on the type of use, hours of operation, and specific equipment present, these areas could contribute to the surrounding noise environment. In addition, the city also experiences noises common in urban environments such as construction, landscaping equipment, barking dogs, loud music, schools, parks, playgrounds, and churches (City of Escondido 2012a).

CITY OF ESCONDIDO MUNICIPAL CODE

The City's Noise Ordinance (EMC Chapter 17, Article 12, "Noise Abatement and Control") prohibits the making of disturbing, excessive, offensive or unusually loud noises within the city limits. Excessive noise is considered as a detriment to public health, comfort, convenience, safety, welfare, and prosperity of City residents. Table 3-4 provides Section 17.229(a) sound limit levels for stationary sources at any point on or beyond the boundaries of the property from where the sound is originated according to land use type and a permitted time of day. According to Section 17.234(a-e), construction activities may not exceed more than one hour of 75 dB sound levels and are limited to Monday through Friday between 7:00 a.m. and 6:00 p.m., or on Saturdays between 9:00 a.m. and 5:00 p.m. However, as stated in Section 17.242(a), the City Manager may waive any or all of the provisions of this subsection in cases where a variance was obtained, and vehicles or equipment used are reduced to the lowest sounds levels while conducting effective operations.

Table 3-4 City of Escondido Sound Level Limits

Zone	Time	Applicable Limit One-hour Average (L_{eq}) Sound Level (Decibels)
Residential	7 a.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
Multi-residential	7 a.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
Commercial	7 a.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	55
Light Industrial/Industrial Park	Anytime	70
General Industrial	Anytime	75

Source: City of Escondido 2012b.

3.13.2 Discussion

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, or a substantial temporary or permanent increase in noise levels above existing ambient levels that could result in an adverse effect on humans?

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. During operation, these types of projects would not permanently introduce any new stationary sources of noise (e.g., machinery, pumps, fans, compressors, or other equipment) and would not generate new vehicle trips that would result in transportation-related noise. Therefore, operation of VMT-reducing projects would not result in any increases in permanent noise sources.

The City has established requirements intended to protect the community from construction-related noise impacts. EMC Section 17.234(a-e) limits construction activities to Monday through Friday between 7:00 a.m. and 6:00 p.m., or on Saturdays between 9:00 a.m. and 5:00 p.m. As stated in EMC Section 17.242(d), construction equipment may not cause noise in excess of a one-hour average sound level (i.e., L_{eq}) limit of 75 dB, unless a variance has been obtained in advance from the City manager. The Federal Transit Administration (FTA) has also established construction noise criteria, which specify noise levels that may result in an adverse community reaction (FTA 2018). The FTA criteria are as follows:

- Residential: 90 dBA L_{eq} (day) and 80 dBA Leq (night)
- Commercial/Industrial: 100 dBA L_{eq} (day and night)

Construction of VMT-reducing projects would result in temporary increases in ambient noise levels from vehicle trips that generate noise. For any given VMT-reducing project, construction-related vehicle trips would travel along multiple roads throughout the city, and therefore not expose any individual sensitive receptor to substantial noise levels for a sustained period of time. Additionally, the minor and temporary increase in construction-related vehicle trips would not result in a substantial increase in ambient noise levels along roadways in the city because, as discussed in Section 3.13.1, "Environmental Setting," a doubling of traffic volume on a roadway would have to occur before an increase in noise levels would be detectable to a person.

The use of heavy equipment would also result in temporary increases in ambient noise levels during construction of VMT-reducing projects. As described in Section 2.4, "Description of the Proposed Program," construction equipment that could be used includes concrete saws for hardscape removal, backhoes or mini excavators, skip loaders, smooth drum rollers, dump trucks, and striping and paving machines, depending on the type of VMT-reducing project. Based on the anticipated construction equipment that would be used and applying reference maximum noise levels for each, average hourly construction noise could range from 76 dBA L_{eq} to 83 dBA L_{eq} at 50 feet from the receptor (FTA 2018, FHWA 2006).

Construction activities for VMT-reducing projects would be required to comply with the City's construction noise requirements outlined in EMC Section 17.234(a-e). Construction activities would be limited to daytime hours. Depending on the specific construction activities involved and the proximity of construction activities to existing sensitive receptors, construction noise levels may exceed the one-hour average sound level limit of 75 dBA L_{eq}, as specified in in EMC Section 17.242(d). However, in these cases, applicants would be required to obtain a variance from the City Manager. Regardless, construction noise levels are not anticipated to exceed FTA's construction noise criteria of 90 dBA L_{eq} in residential areas and 100 dBA L_{eq} in commercial and industrial areas. Therefore, construction activities would not result in an adverse community reaction.

With regard to human response, changes in noise of 1 to 2 dB are generally not perceptible to people in typical noisy environments. However, it is widely accepted that people can begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dB increase is generally perceived as a distinctly noticeable increase, and a 10-dB increase is generally perceived as a doubling of loudness (Caltrans 2013: 2-10). However, a substantial increase in

noise itself does not necessarily constitute a significant noise impact, so long as overall noise exposure is below an acceptable level and does not result in excessive exposure for extended periods of time (FTA 2018)

As discussed in Section 3.13.1, existing noise levels range from 72-81 dBA CNEL along the loudest roadways in the city. For construction activity along these roadways, construction noise would be masked by existing ambient noise levels. However, at other locations, such as in quieter, residential neighborhoods away from major roadways, existing ambient noise levels could be below 60 dBA CNEL. In these areas, construction-related noise increases could exceed 10 dB, which would be perceived by people adjacent to the equipment as more than a doubling of existing noise levels. Actual increases in noise levels would vary depending on the distance from the construction equipment to the receptor and the presence of intervening topography, vegetation, or structures, which may provide shielding and reduce noise levels.

FTA provides general and detailed guidance for assessing construction noise impacts and this analysis is developed largely based on the general guidance. In addition, FTA recognizes the greater potential for noise impacts to occur when construction activities result in noise exposure for extended periods of time, which FTA has identified as 30 days, and in these circumstances, recommends the use of lower noise standards that account for the sensitive time of the day. Because the proposed project's construction would occur during the daytime hours and each individual phase would be relatively short (i.e., one to two days at any one location), it is appropriate to only consider the hourly noise levels at each construction location, assessing construction noise as a temporary and intermittent source rather than a source that occurs for an extended period of time.

On average, construction activities for each VMT-reducing project would be short-term, lasting for approximately one to two weeks. Construction activities would not involve particularly noisy equipment or activities, such as blasting or pile driving. Different pieces of construction equipment would be used intermittently to complete the work and would move linearly along a roadway or corridor and through a given area at an approximate rate of 250 to 350 feet per day. Because the sources of construction noise would be mobile and shifting as the work is performed, the exposure of individual residents, households, and other sensitive receptors to substantial noise level increases would be limited to a fraction of a workday. Furthermore, construction-related noise-generating activities would be limited to daytime hours when ambient noise levels are higher and people are less likely to be disturbed or awakened. Such brief, intermittent periods of exposure to substantial noise level increases would not result in the kinds of adverse health effects to humans that are associated with prolonged exposure to sustained substantial noise levels over long periods of time (e.g., weeks or months) or to substantial noise level increases that disrupt sleep. Thus, for all the foregoing reasons, construction activities would not result in substantial temporary increases in noise levels that would adversely affect human health or well-being in the city.

Based on the above discussion, implementation of VMT-reducing projects under the program would not generate substantial temporary or permanent increases in ambient noise levels in the vicinity of a given project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, or a substantial temporary or permanent increase in noise levels above existing ambient levels that could result in an adverse effect on humans. This impact is less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. Operation of these projects would not introduce stationary or transportation-related sources of groundborne vibration or noise. Therefore, operation of VMT-reducing projects would not generate excessive groundborne vibration or noise levels.

Based on FTA guidance, transient vibrations (such as construction activity) with a 0.2 inches per second (in/sec) PPV may be characterized as causing structural damage to non-engineered timber and masonry buildings, 0.3 PPV in/sec for engineered concrete masonry, and 0.5 PPV in/sec for reinforced concrete, steel, or timber structures. In addition, peak VdB established by the FTA, recommend a level of 80 VdB for the purpose of evaluating disturbance to sensitive land uses where people sleep.

Construction of VMT-reducing projects would result in temporary increases in groundborne noise and vibration from the use of heavy equipment. As described in Section 2.4, "Description of the Proposed Program," construction equipment that could be used includes concrete saws for hardscape removal, backhoes or mini excavators, skip loaders, smooth drum rollers, dump trucks, and striping and paving machines, depending on the type of VMT-reducing project. Construction activities would not require the use of pile drivers or other types of equipment that produce substantial groundborne vibration or noise. Of the types of equipment that would be used, vibratory rollers would generate the highest levels of vibration. Based on FTA guidance, reference vibration levels for this type of equipment are 0.21 PPV in/sec and 94 VdB at 25 feet (FTA 2018). FTA recommended criteria of 0.2 PPV in/sec for structural damage and 80 VdB for human disturbance could be exceeded for VMT-reducing projects at distances within 75 feet and 25 feet, respectively, of construction equipment use. Actual exposure levels would depend on equipment types, haul truck routes, and proximity to and characteristics of sensitive receptors.

As discussed in Section 3.13.2(a), construction activities for each VMT-reducing project would be short-term, lasting, on average, approximately one to two weeks. Different pieces of construction equipment would be used intermittently to complete the work and would move linearly along a roadway or corridor and through a given area at an approximate rate of 250 to 350 feet per day. Because the sources of groundborne vibration and noise would be mobile and shifting as the work is performed, the exposure of individual residents, households, and other sensitive receptors to excessive groundborne vibration and noise would be limited to a fraction of a workday. Furthermore, construction activities that generate groundborne vibration and noise would be limited to daytime hours when people are less likely to be disturbed or awakened. Such brief, intermittent periods of exposure to increases in groundborne vibration and noise would not result in the kinds of adverse health effects to humans that are associated with prolonged exposure to sustained substantial groundborne vibration and noise levels over long periods of time (e.g., weeks or months) or to substantial noise level increases that disrupt sleep. Furthermore, most construction activities would be located at distances greater than 25 feet from the nearest structures and vibration levels would dissipate rapidly at increasing distance from the vibration source. Finally, it is extremely rare for structural damage to occur from equipment other than pile driving, at these distances, thus, the potential for structural damage from the proposed construction activities would not be a concern. For all the foregoing reasons, implementation of VMT-reducing projects under the program would not generate excessive groundborne vibration or groundborne noise levels. This impact is less than significant.

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

No impact. VMT-reducing projects that would be implemented as part of the program would not be located within the vicinity of a private airstrip or an airport land use plan. In addition, these projects do not propose the siting of any new sensitive receptors near existing airstrips or airports. Therefore, implementation of the program would not expose people residing or working in the project area to excessive airport-related noise levels. No impact would occur.

3.14 POPULATION AND HOUSING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. Population and Housing.				
Would the program:				
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?	☐	☐	☐	☒

3.14.1 Environmental Setting

Historically, the city of Escondido has experienced a slower rate of population growth than the San Diego region. By 2035, the buildout date for the City's General Plan, SANDAG forecasts that the population in the city will increase to over 168,779 people, which represents a 17 percent growth rate when compared to 2010 conditions. In comparison, the San Diego region is anticipated to grow by 30 percent from 2010 to 2035 (City of Escondido 2012b).

Based on data from the US Census Bureau, the city's population in 2020 was 151,271 people (US Census Bureau 2021). In 2020, there were 48,724 households in the city with an average household size of approximately 3.04 people (US Census Bureau 2021).

3.14.2 Discussion

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)?

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would not induce population growth directly or indirectly because the projects do not propose new housing or changes to policies or regulations related to land use or residential zoning. Additionally, VMT-reducing projects would generally be located in urbanized areas that are within 0.5-mile travel distance of a proposed development project and in proximity to key destinations (e.g., existing parks, schools, community centers, or shopping centers). Therefore, VMT-reducing projects would not induce population growth through the extension of transportation infrastructure to undeveloped areas. Furthermore, improvements to the pedestrian, bicycle, and transit network would support the growth and development that is anticipated occur under the land use assumptions contained within the City's General Plan. Construction of VMT-reducing projects could result in a temporary increase in the number of construction workers in the program area. However, these types of projects are small construction projects, which would not require a large construction crew. Furthermore, construction workers would likely be from the San Diego region and permanent, substantial relocation of workers would not be required. Therefore, implementation of VMT-reducing projects under the program would not result in substantial population growth or employment growth in the program area. This impact is less than significant.

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

No impact. VMT-reducing projects that would be implemented as part of the program would occur within developed roadway rights-of-way. These projects would not displace people or housing because they would not require the removal of existing housing and would not propose changes to policies or regulations related to land use or residential zoning. Therefore, implementation of VMT-reducing projects under the program would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impact would occur.

3.15 PUBLIC SERVICES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. Public Services.				
Would the program:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

3.15.1 Environmental Setting

The City of Escondido Fire Department (EFD) and the Escondido Police Department (EPD) are the primary agencies responsible for providing fire protection and police protection services in the program area. Their joint headquarters are located at the combined Police and Fire Facility, at 1163 North Centre City Parkway. EFD operates seven fire stations and is staffed by 93 full-time safety officers, 18 full-time non-safety staff, 10 full-time administration, 3 part-time administration, and 27 senior volunteers. EFD is responsible for the protection of life and property from fire, explosion, hazardous materials incidents, severe weather, earthquakes, transportation disasters, multi-casualty incidents, terrorist acts, and other emergencies (EFD 2022). EPD has 170 sworn police personnel and 69 non-sworn support personnel who provide a variety of services, such as conducting criminal investigations and responding to emergency and routine calls for police service (EPD 2022).

Elementary and middle school educational services within the program area are provided by the Escondido Union School District (EUSD), while high school services are provided by the Escondido Union High School District (EUHSD). In addition to public schools operated by EUSD and EUHSD, the city contains a variety of charter and private school facilities (City of Escondido 2012b).

The City operates a number of other facilities, which include various government buildings, a library, and parks and recreational facilities. The Escondido Public Library is located at 239 South Kalmia Street, Escondido, CA 92025 (City of Escondido 2012b).

3.15.2 Discussion

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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?

Police protection?

Schools?

Parks?

Other public facilities?

No impact. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects do not include development of new residences or the creation of permanent jobs requiring increased fire or police services. As discussed in Section 3.14, "Population and Housing," VMT-reducing projects would not induce population growth that would generate new students in the community or new residents that would require school services, new or expanded park facilities, other public facilities. Therefore, implementation of VMT-reducing projects under the program would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities. No impact would occur.

3.16 RECREATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Recreation.				
Would the program:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

3.16.1 Environmental Setting

The City maintains many parks and recreational facilities throughout the program area, including regional parks, community parks, neighborhood parks, urban parks, trails, and recreational facilities (City of Escondido 2012b). The City's General Plan establishes the acceptable service standard ratio for parks. Quality of Life Standard 6, Parks System, requires the City to provide a minimum of 11.8 acres of active and passive parkland per 1,000 dwelling units. This parkland acreage must involve a minimum of 5.9 acres of developed active neighborhood and community parks in addition to 5.9 acres of passive park land and/or open space for habitat preservation per 1,000 dwelling units (City of Escondido 2012a).

3.16.2 Discussion

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

No impact. Population growth in an area can result in an increase in the demand for parks and recreational facilities. VMT-reducing projects would include improvements to the City's existing pedestrian, bicycle, and transit network. These types of improvements would not include construction of new housing or commercial development, and therefore, would not contribute to population growth. In addition, the number of construction workers needed to install future projects would be minimal and would not substantially increase the use of existing recreational facilities. Therefore, implementation of VMT-reducing projects under the program would not increase the use of recreational facilities to the extent that substantial deterioration would occur. No impact would occur.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No impact. As discussed in Section 3.16.2(a), VMT-reducing projects would not include development of recreational facilities and would not induce population growth that would require the construction or expansion of recreational facilities. No impact would occur.

3.17 TRANSPORTATION

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

3.17.1 Environmental Setting

The transportation system in the city consists of highways, streets, pedestrian pathways, transit routes, and bikeways. The circulation system is connected to the larger regional network, which includes SR 78 and I-15. Metropolitan Transit System and NCTD provide bus service in the program area. Bus service is generally provided along major circulation corridors with a heavier concentration of bus routes in the downtown area. There are two major bus transfer points located within the program area: Escondido Transit Center and Del Lago Transit Station. NCTD also operates a light rail transit system, the SPRINTER, which extends along the SR 78 corridor. Several major roadways within the program area are equipped with bike lanes, including Centre City Parkway, Bear Valley Parkway, El Norte Parkway and Mission Avenue. In addition to street bicycle facilities, Escondido has two regionally significant off-street bike paths: the Inland Rail Trail and the Escondido Creek Bikeway. The Inland Rail Trail follows the SPRINTER railroad right-of-way west to the cities of San Marcos and Vista. The Escondido Creek Bikeway extends east-west across the city through the downtown area (City of Escondido 2012b).

3.17.2 Discussion

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

Less than significant. Applicable programs, plans, and policies that address the circulation system within the program area include the following:

- The SANDAG 2050 Regional Transportation Plan (RTP) serves as the blueprint for developing a regional transportation system that further enhances quality of life, promotes sustainability, and offers more mobility options for people and goods in the San Diego region. The RTP includes strategies and programs to reduce VMT in the region, including actions to promote active transportation and improve transit infrastructure (SANDAG 2011).
- The Mobility and Infrastructure Element of the City's General Plan includes policies that address the transportation system, including policies to promote non-vehicular facilities, walkability, active living, transit usage, transportation demand management strategies, and complete streets (City of Escondido 2012a).

- The City's CAP includes a variety of measures to reduce GHG emissions through promoting and improving alternate modes of transportation. GHG reduction measures include synchronizing traffic signals and installing roundabouts to reduce vehicle idling, encouraging vanpooling, improving pedestrian infrastructure, implementing a Safe Routes to School program, developing a Transportation Demand Management Plan, installing new bicycle lanes, increasing the number of commuters using transit from new residential developments within the Downtown Specific Plan area, developing an intra-city shuttle system, increasing transit ridership, and establishing a new VMT threshold for new projects to reduce VMT.

VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would improve the operation of the circulation system by encouraging walking, bicycling, and taking public transit and thereby reducing vehicle trips on roadways in the program area. Therefore, these projects would support rather than conflict with the programs and policies in the SANDAG 2050 RTP as well as the City's General Plan and CAP that are intended to reduce VMT. Construction of VMT-reducing projects would result in a temporary increase in construction-related vehicle trips and worker commutes. However, these types of projects would be considered small construction projects, which would not require a large construction crew and would not result in a substantial number of vehicle trips. Therefore, implementation of VMT-reducing projects under the program would not adversely affect the performance of the circulation system and would not conflict with any applicable transportation programs, plans, or polices. This impact is less than significant.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

Less than significant. As described in Section 2.2, Senate Bill 743 required OPR to develop new CEQA guidelines that address traffic metrics under CEQA. The Office of Administrative Law approved comprehensive updates to the CEQA Guidelines (including Section 15064.3[b]) that included removing level of service as a measure of transportation impacts under CEQA and replacing it with VMT. A "vehicle mile traveled" is defined as one vehicle traveling on a roadway for 1 mile. According to OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, projects that generate or attract fewer than 110 vehicle trips per day generally may be assumed to cause a less-than-significant transportation impact (OPR 2018).

VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These improvements would not induce population growth directly or indirectly because they do not propose new housing and do not propose changes to policies or regulations related to land use or residential zoning. Rather, as shown in Table 2-1, VMT-reducing projects are anticipated to reduce vehicle trips. The VMT reductions would vary depending on the type and length of improvements. Construction of VMT-reducing projects would not require large construction crews, and thus, would not result in a number of vehicle trips that would exceed 110 vehicle trips per day. Thus, any temporary VMT increases associated with construction activities would be offset by the overall net benefits of long-term VMT reduction from implementation of the program. Therefore, implementation of VMT-reducing projects under the program would not conflict or be inconsistent with CEQA Guidelines section 15064.3(b). This impact is less than significant.

c) 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. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would occur within roadway rights-of-way. Improvements within roadway rights-of-way would be required to comply with the City's *Design Standards and Standard Drawings*, which specifies appropriate alignments, grades, and widths for all types of streets (City of Escondido 2014). Compliance with applicable design standards would ensure that traffic safety hazards are minimized. Furthermore, VMT-reducing projects are intended to improve the safety of the existing transportation network, such as through upgrading bicycle facilities; extending sidewalks; and installing high-visibility crosswalks,

pedestrian hybrid beacons, pedestrian signals, mid-block crosswalks, pedestrian refuge islands, speed tables, bulb-outs (i.e., curb extensions), curb ramps, roundabouts and mini-circles, and pedestrian-only connections and districts.

Construction activities for VMT-reducing projects would occur within roadway rights-of-way and have potential to increase hazards for bicyclists and pedestrians using the existing transportation network. Encroachment permits from the City would be required for all work within public rights-of-way. As a requirement of encroachment permit approval, project proponents would be required to develop a traffic control plan that meets the requirements of the most current California Manual on Uniform Traffic Control Devices (Caltrans 2021) and the latest edition of the Standard Specifications for Public Works Construction. Compliance with the encroachment permit and traffic control plan would ensure that traffic safety hazards within public rights-of-way are minimized for the duration of construction activities. Therefore, implementation of VMT-reducing projects under the program would not increase hazards due to a geometric design feature or incompatible uses. This impact is less than significant.

d) Result in inadequate emergency access?

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would occur within roadway rights-of-way and have potential to alter existing roadways that serve as emergency access routes. All improvements within roadway rights-of-way would be designed in compliance with the most recent California Fire Code at the time of project implementation. The California Fire Code, which is adopted by reference in the Escondido Fire Code, requires the width of an unobstructed roadway to measure no less than 24 feet in order to provide adequate access for fire and emergency responders. Additionally, improvements within roadway rights-of-way would be required to comply with the City's *Design Standards and Standard Drawings*, which require emergency access roads be designed and constructed to the requirements of City Engineer and Fire Marshal (City of Escondido 2014). Compliance with applicable codes and design standards would ensure that adequate emergency access is provided in the design of VMT-reducing projects.

Construction activities for VMT-reducing projects would occur within roadway rights-of-way and may require temporary lane closures or result in other traffic disruptions. Encroachment permits from the City would be required for all work within public rights-of-way. As a requirement of encroachment permit approval, project proponents would be required to develop a traffic control plan that meets the requirements of the most current California Manual on Uniform Traffic Control Devices (Caltrans 2021) and the latest edition of the Standard Specifications for Public Works Construction. Compliance with the encroachment permit and traffic control plan would ensure that traffic disruptions are minimized and adequate emergency access is provided for the duration of construction activities. Therefore, implementation of VMT-reducing projects under the program would not result in inadequate emergency access. This impact is less than significant.

3.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. Tribal Cultural Resources.				
Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?	☒ Yes		☐ No	
Would the program cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

3.18.1 Environmental Setting

Lands within the city of Escondido were traditionally inhabited by the Kumeyaay/Diegueño and Luiseño Native Americans. Diegueño is recognized as a member of the California-Delta Yuman division of the Yuman-Cochimi language family, and includes three main dialects: Ipai, Kumeyaay, and Tipai. The Ipai occupied the central portion of San Diego County, while the Kumeyaay inhabited the southern portion of the county, including lands extending into the California portion of the Colorado Desert. The Tipai territory included the lands from Jamul southward into Baja California, south of Ensenada. Modern ethnographers tend to combine the Kumeyaay and the Tipai as a single, continuous social group. The Luiseño traditional use area is mapped as extending from the Pacific Ocean inland to Lake Elsinore and Palomar Mountain in the east and extending from Agua Hedionda in the south to Aliso Creek in the north (City of Escondido 2012b).

AB 52, signed into law in September of 2014, established a new class of resources under CEQA: "tribal cultural resources," defined in PRC 21074. Pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, where one or more California Native American Tribes has requested formal written notification of proposed projects from a lead agency, the lead agency shall begin consultation with those tribes by providing them with formal written notification of proposed projects prior to the release of an environmental impact report, negative declaration, or mitigated negative declaration.

In compliance with PRC section 21080.3.1, the City provided formal written notification of the program on September 7, 2022 to Rincon Band of Luiseno Indians, San Luis Rey Band of Mission Indians, San Pasqual Band of Mission Indians, Soboba Band of Luiseno Indians, and Mesa Grande Band of Mission Indians. The San Pasqual Band of

Mission Indians requested consultation on September 18, 2022, and the City and Tribe met on October 21, 2022. The Rincon Band of Luiseno Indians requested consultation on October 17, 2022, and the City and Tribe will meet on November 10, 2022. The tribal consultation process is ongoing and will be completed before the Final Initial Study/Negative Declaration is considered by the City Council. The outcome of consultation will be summarized in the Final Initial Study/Negative Declaration.

3.18.2 Discussion

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

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

and

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

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. The activities involved in constructing VMT-reducing projects would include minor grading, excavation, and other ground disturbance. However, VMT-reducing projects would be located in developed areas within roadway rights-of-way, such as on existing roads and sidewalks, or in disturbed areas along roadway shoulders. Because ground disturbance would be limited to shallow depths, comprised of artificial fill or previously disturbed soils, tribal cultural resources are unlikely to be encountered. Therefore, implementation of VMT-reducing projects under the program would not adversely affect tribal cultural resources. This impact is less than significant.

3.19 UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. Utilities and Service Systems.				
Would the program:				
a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate 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) Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

3.19.1 Environmental Setting

Several agencies supply water to the city, including the City of Escondido Water and Wastewater Division (EWWD), Rincon Del Diablo Municipal Water District (MWD), Vallecitos Water District (VWD), Valley Water MWD, and Vista Irrigation District. Wastewater services are provided by EWWD and VWD. Escondido Disposal provides solid waste disposal services. Residential waste collected by Escondido Disposal is hauled to the Escondido Resource Recovery Transfer Station where it is sorted prior to being transported to the Sycamore Sanitary Landfill or Otay Mesa Landfill.

The City maintains the public roadway network and sidewalks, right-of-way electrical facilities, and the public storm drain conveyance system within the program area. The primary purpose of the public storm drain conveyance system is to facilitate the conveyance of drainage water from rainfall events away from urban areas (City of Escondido 2012b:4.17-27).

SDG&E, a regulated public utility, supplies electricity and natural gas to the city. SDG&E procures electricity generated from a variety of energy sources including coal, natural gas, nuclear, hydroelectric, and a mix of renewable resources.

3.19.2 Discussion

a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

No impact. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would not involve development of new land uses (e.g., residential, commercial, or industrial) and would not induce population growth in the area that would require the construction of new or expanded utilities. Although construction activities for VMT-reducing projects may require minor ground disturbance, excavation would be limited to shallow depths and would not require the relocation of underground utility lines, such as water or sewer lines. Some VMT-reducing projects, such as those involving the construction of new sidewalks or bicycle facilities, could require the relocation of existing above-ground utilities (e.g., powerlines or utility boxes) or stormwater infrastructure (e.g., curb, gutter, and drains) within roadway rights-of-way. However, the environmental effects of these utility relocations would be minor and consistent with the effects described throughout this IS/proposed ND. Therefore, implementation of VMT-reducing projects under the program would not result in significant environmental effects from the relocation or construction of water infrastructure, wastewater treatment facilities, storm drainage facilities, electric power, natural gas, or telecommunications facilities. No impact would occur.

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

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would not involve development of new land uses (e.g., residential, commercial, or industrial) and would not induce population growth in the area that would increase demand for water supplies. Pedestrian network improvements and bus stop upgrades may include the installation of new landscaping, which would increase water demands compared to existing conditions. However, landscaping would be limited to water-efficient varieties, such as plants that are native to the San Diego region or are adapted to a hot dry summer and cool winter climate, as required by EMC Article 62, "Water Efficient Landscape Regulations." Therefore, VMT-reducing projects would not result in a substantial permanent increase in the water demand. Construction activities for VMT-reducing projects may require small amounts of water for dust control and grading, which would be sourced from existing water supplies. Therefore, implementation of VMT-reducing projects under the program would not result in a physical impact associated with provision of sufficient water supplies, including related infrastructure needs. This impact is less than significant.

c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would not involve development of new land uses (e.g., residential, commercial, or industrial) and would not induce population growth in the area that would increase demand for wastewater treatment. Further, VMT-reducing projects would not involve the construction of new restroom facilities. Depending on the duration and location of VMT-reducing projects, the applicant may supply portable restrooms for use by work crews. Portable restrooms are self-contained and would be cleaned periodically, and the waste would be hauled off-site to a wastewater treatment facility for disposal. This service is typically provided by an independent contractor permitted to handle, haul, and dispose of sanitary sewage. Pursuant to 40 CFR Part 403.5, hauled waste must be disposed of at a designated publicly owned treatment facility. Typically, publicly owned treatment facilities are responsible for implementing permit programs for hauled waste and

ensure that adequate treatment capacity exists. Therefore, implementation of VMT-reducing projects under the program would not exceed the capacity of any wastewater treatment provider. This impact is less than significant.

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?

and

Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than significant. The City requires the development of a construction waste management plan (CWMP) for all new building construction and demolition projects. The purpose of the CWMP is to ensure that 65% of non-hazardous construction and demolition debris (e.g., asphalt, concrete, brick, dirt, rock, lumber, cardboard, metals, and any vegetative or other land clearing/landscaping materials) is recycled in compliance with SB 1374 and the California Green Building Standards Code (CalGreen, CCR Title 24) waste diversion requirements.

VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would not involve development of new land uses (e.g., residential, commercial, or industrial) and would not induce population growth in the area that would increase long-term demand for solid waste disposal services. Construction activities for VMT-reducing projects would not involve new building construction, but may require the removal of existing pavement, soils, and other debris. These types of projects would temporarily generate small amounts of solid waste that would be accommodated by nearby landfills. If determined to be applicable, project proponents would develop a CWMP to reduce solid waste generation and comply with the waste diversion requirements of SB 1374 and CalGreen. Based on the above discussion, VMT-reducing projects would not generate solid waste in excess of State or local standards or in excess of the capacity of existing landfills. This impact is less than significant.

3.20 WILDFIRE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. Wildfire.				
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?		☒ Yes		☐ No
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation 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?	☐	☐	☒	☐

3.20.1 Environmental Setting

CAL FIRE has mapped FHSZs for the entire state. FHSZs are based on an evaluation of fuels, fire history, terrain, housing density, and occurrence of severe fire weather and are intended to identify areas where urban fires could result in catastrophic losses. FHSZs are categorized as moderate, high, and very high. According to CAL FIRE's Fire Resource Assessment Program, several areas around the perimeter of the city are categorized as very high FHSZs (CAL FIRE 2009).

EFD is the primary agency responsible for wildfire protection in the program area. EFD implements various programs such as weed and vegetation abatement and enforces the Escondido Fire Code to improve public safety. EMC Section 11-15 adopts the more recent 2019 California Fire Code, which contains regulations regarding defensible space, vegetation management, and fire safety during construction.

3.20.2 Discussion

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than significant. VMT-reducing projects that would be implemented as part of the program would include improvements to the City's existing pedestrian, bicycle, and transit network. These projects would occur within

roadway rights-of-way and could alter existing roadways that serve as emergency access routes, which would have the potential to impair adopted emergency response plans. As discussed in Section 3.17.2(d), all improvements within roadway rights-of-way would be designed in compliance with the California Fire Code, which is adopted by reference in the Escondido Fire Code. The California Fire Code requires the width of an unobstructed roadway to measure no less than 24 feet in order to provide adequate access for fire and emergency responders. Additionally, improvements within roadway rights-of-way would be required to comply with the City's *Design Standards and Standard Drawings*, which require emergency access roads be designed and constructed to the requirements of City Engineer and Fire Marshal (City of Escondido 2014). Compliance with applicable codes and design standards would ensure that adequate access is provided for fire and emergency responders during operations of VMT-reducing projects.

Construction activities for VMT-reducing projects would occur within roadway rights-of-way and may require temporary lane closures or result in other traffic disruptions. Encroachment permits from the City would be required for all work within public rights-of-way. As a requirement of encroachment permit approval, project proponents would be required to develop a traffic control plan that meets the requirements of the most current California Manual on Uniform Traffic Control Devices (Caltrans 2021) and the latest edition of the Standard Specifications for Public Works Construction. Compliance with the encroachment permit and traffic control plan would ensure that adequate access is provided for fire and emergency responders for the duration of construction activities. Therefore, implementation of VMT-reducing projects under the program would not impair an adopted emergency response plan or emergency evacuation plan. This impact is less than significant.

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?

No impact. As discussed in Section 3.14, "Population and Housing," VMT-reducing projects that would be implemented as part of the program would not include the construction of new housing and do not propose changes to policies or regulations related to land use or residential zoning. Additionally, VMT-reducing projects would not introduce new occupants that could be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of as wildfire. Furthermore, VMT-reducing projects would be primarily within developed roadway rights-of-way where wildfire risk is low. No impact would occur.

c) Require the installation 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. VMT-reducing projects that would result in the construction of new pedestrian and bicycle facilities could alter existing roadways. No other infrastructure (such as new roads, 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 are proposed. VMT-reducing projects could require the use of construction vehicles and equipment within areas categorized as very high FHSZs. The temporary and periodic use of construction vehicles and equipment within a very high FHSZ has the potential to increase the risk of an accidental fire ignition. However, construction activities associated with their implementation would occur within developed roadway rights-of-way where wildfire risk is low. In addition, enforcement of the California Fire Code would require the implementation of fire safety measures during construction. Safety measures would include prohibiting smoking except in approved areas and ensuring proper use of motorized equipment so that exhausts do not discharge against combustible material and refueling would not occur while in equipment was in operation. Therefore, implementation of VMT-reducing projects under the program would not exacerbate fire risks. This impact is less than significant.

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?

Less than significant. Wildfire can significantly alter the hydrologic response of a watershed by reducing vegetative cover and altering soil characteristics. As a result, subsequent rainstorms after wildfire can produce landslides and debris flows, which can affect people or structures that are located below an area that has burned. Ground disturbing activities have the potential to destabilize soils, exacerbating post-fire landslide and debris flow hazards.

Construction of VMT-reducing projects would require minor grading, excavation, and other ground disturbance. As discussed in Section 3.7, "Geology and Soils," the program area contains small landslide hazard areas, which are located along the periphery of the city on slopes greater than 25 percent. However, ground disturbing activities for VMT-reducing projects would generally occur in disturbed areas within roadway rights-of-way where existing transportation infrastructure is present. These projects would not typically occur on steep slopes and would also be required to comply with the City's *Design Standards and Standard Drawings*, which specifies grading and erosion control standards (City of Escondido 2014). Furthermore, as discussed in Section 3.20.2(c), VMT-reducing projects would not exacerbate fire risk, and thus would not result in a substantial increase in post-fire flooding and landslide due to an increase in wildfire risk itself. Therefore, implementation of VMT-reducing projects under the program would not result in flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. This impact is less than significant.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. 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 an endangered, rare, or threatened species, 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 that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

3.21.1 Environmental Setting

Environmental settings provided throughout Sections 3.1 to 3.20 were used in preparing the impact discussion for this section.

3.21.2 Discussion

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 an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?

Less than significant. As discussed in Section 3.1, "Aesthetics"; Section 3.3, "Air Quality"; Section 3.8, "Greenhouse Gas Emissions"; Section 3.9, "Hazards and Hazardous Materials"; Section 3.10, "Hydrology and Water Quality"; and Section 3.13, "Noise," project construction would result in short-term and temporary changes to the visual environment; increases in air pollutants, greenhouse gas emissions, and noise levels; erosion and degradation of water quality; and potential releases of hazardous materials into the environment. However, through compliance with applicable permits, programs, and regulations during construction, implementation of VMT-reducing projects under the program would not substantially degrade the quality of the environment.

As described in Section 3.4, "Biological Resources," VMT-reducing projects would be located in developed areas within roadway rights-of-way, such as on existing roads and sidewalks, or in disturbed areas along roadway shoulders that are surrounded by urban development. These projects would be located in areas that lack habitat for fish or wildlife species. Therefore, implementation of VMT-reducing projects under the program would not have potential to reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

As described in Section 3.5, "Cultural Resources," VMT-reducing projects would not involve the demolition, destruction, alteration, or structural relocation of a historical resource. Projects would be required to comply with applicable City review and design requirements governing public right-of-way improvements within historic districts. Additionally, as described in Section 3.5, "Cultural Resources"; Section 3.7, "Geology and Soils"; and Section 3.18, "Tribal Cultural Resources," ground disturbance would be limited to shallow depths, comprised of artificial fill or previously disturbed soils, within developed roadway rights-of-way. Therefore, archaeological resources, cemeteries or burials, paleontological resources, and tribal cultural resources are unlikely to be encountered during construction activities. Furthermore, projects would be required to comply with applicable polices and regulations governing the protection of cultural and paleontological resources. Therefore, implementation of VMT-reducing projects under the program would not eliminate important examples of the major periods of California history or prehistory.

Through compliance with applicable permits, programs, and regulations, implementation of VMT-reducing projects under the program would not 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 an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory. This impact is less than significant.

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

Less than significant. Cumulative environmental effects are multiple individual effects that, when considered together, would be considerable or compound or increase other environmental impacts. Individual effects may result from a single project or a number of separate projects and may occur at the same place and point in time or at different locations and over extended periods of time.

As described in Sections 3.1 through 3.20 of this IS/proposed ND, construction activities would result in short-term and temporary effects on the environment, including the following: changes to the visual setting; increases in air pollutants and noise levels; erosion and degradation of water quality; potential releases of hazardous materials into the environment; and increases in demand for utilities and services. Construction-related effects would be localized within the immediate vicinity of each project site and would cease following the construction period. Additionally, compliance with applicable permits, programs, regulations referenced throughout this IS/proposed ND would minimize impacts such that construction-related impacts would not contribute to a cumulative effect when combined with the effects of other cumulative projects.

As described in Sections 3.1 through 3.20 of this IS/proposed ND, operation of VMT-reducing projects would not result in substantially adverse environmental effects. Rather, VMT-reducing projects would reduce vehicle trips, with the co-benefits of reducing air pollutant and greenhouse gas emissions and reducing reliance on fossil fuels. Therefore, operations-related impacts would not contribute to a cumulative effect when combined with the effects of other cumulative projects.

Reasonably foreseeable future development in the city would be subject to the same land use and environmental regulations as described throughout this IS/proposed ND. Development projects within the city are guided by policies identified in the City's General Plan and by the regulations established in the City's Municipal Code.

Compliance with these local regulations would minimize the combined effects of the related projects, thereby minimizing the potential for those effects to combine with VMT-reducing projects to produce a cumulatively considerable impact. Based on the above discussion, implementation of VMT-reducing projects under the program would not result in a cumulatively considerable contribution to environmental impacts. This impact is less than significant.

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

Less than significant. As discussed in Section 3.3, "Air Quality"; Section 3.8, "Greenhouse Gas Emissions"; Section 3.9, "Hazards and Hazardous Materials"; Section 3.10, "Hydrology and Water Quality"; Section 3.13, "Noise"; and Section 3.17, "Transportation"; project construction would result in the short-term and temporary increases in air pollutants, greenhouse gas emissions, and noise levels; degradation of water quality; potential releases of hazardous materials into the environment; and disruptions to the transportation network. However, through compliance with applicable permits, programs, and regulations during construction, these environmental effects would not cause substantial adverse effects on human beings. Furthermore, these construction-related effects would be offset by the overall net benefits of long-term VMT reduction and associated air pollutant and greenhouse gas emissions reductions from implementation of the program. Therefore, implementation of VMT-reducing projects under the program would not result in substantial adverse effects on human beings. This impact is less than significant.

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None

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3.21 Mandatory Findings of Significance

None

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