

DRAFT

INITIAL STUDY / ENVIRONMENTAL CHECKLIST

AND MITIGATED NEGATIVE DECLARATION

FOR THE

GARRISON STREET OCEANSIDE PROJECT

OCEANSIDE, CALIFORNIA

Prepared by:

**RECON Environmental, Inc.
3111 Camino del Rio North, Suite 600
San Diego, CA 92108
(619) 308-9333**

June 2025

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INITIAL STUDY

City of Oceanside California

1. PROJECT TITLE:

Garrison Street Oceanside

2. LEAD AGENCY & ADDRESS:

City of Oceanside
300 N. Coast Highway
Oceanside, CA 92054

3. CONTACT PERSON & PHONE:

Dane Thompson; (760) 435-3562

4. PROJECT LOCATION:

333 Garrison Street, Oceanside, CA

5. PROJECT SPONSOR & ADDRESS:

Michael Torres
TTLC Oceanside Garrison, LLC
4350 Von Karman Ave., Suite 200
Newport Beach, CA 92660

6. GENERAL PLAN DESIGNATION:

EXISTING: Civic Institutional (CI) and Medium Density C Residential (MDC-R)
PROPOSED: Medium Density C Residential (MDC-R)

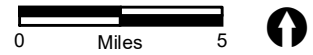
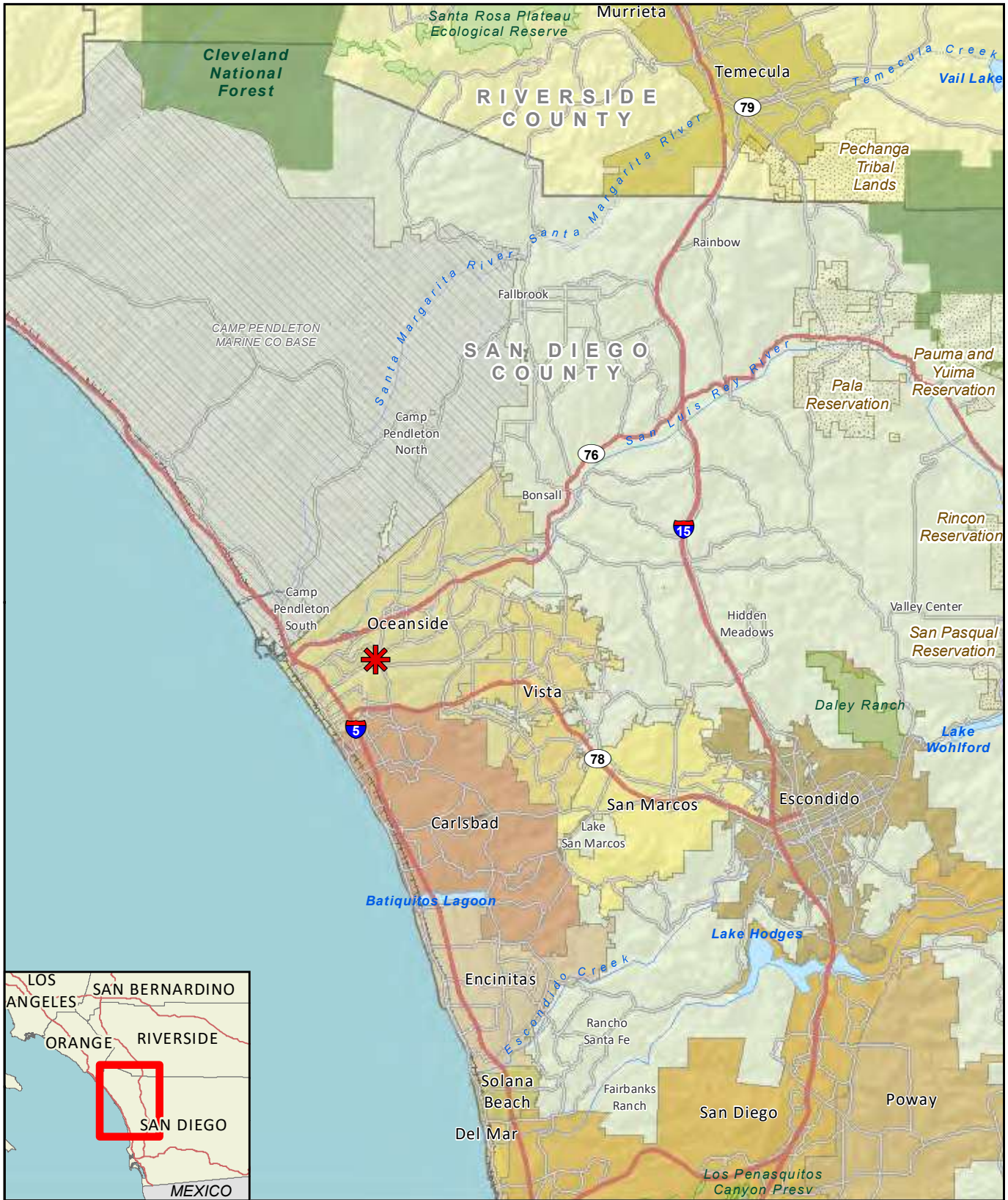
7. ZONING:

EXISTING: Public and Semipublic (PS) and Medium Density C (RM-C)
PROPOSED: Planned Development District (PD)

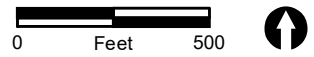
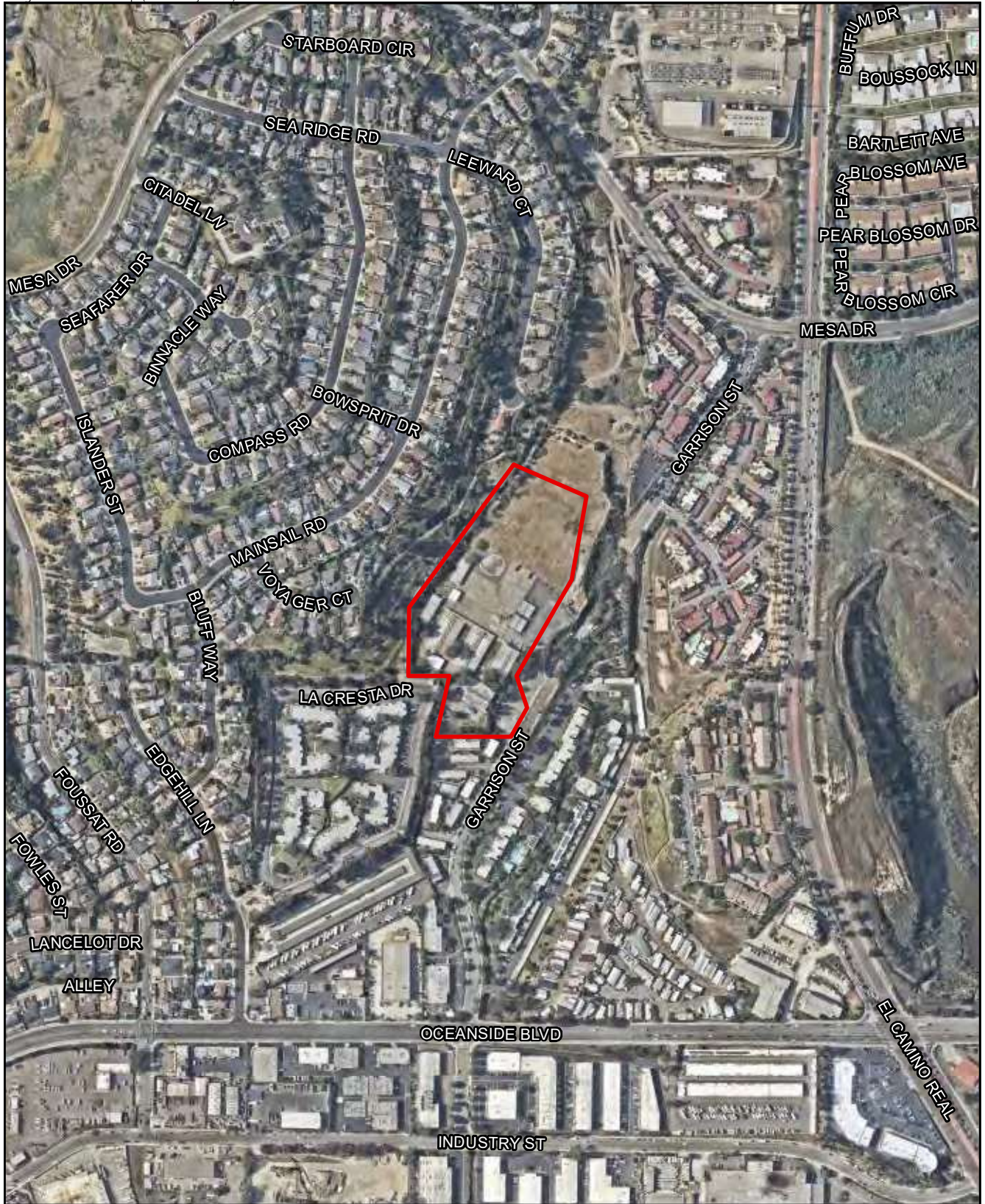
8. PROJECT DESCRIPTION:

PROJECT OVERVIEW

TTLC Oceanside Garrison, LLC (Applicant) is proposing the following: a General Plan Amendment (GPA24-00002) to redesignate the project site from Civic Institutional (CI) to Medium Density C Residential (MDC-R); a Zone Amendment (ZA24-00001) to change the zoning from Public Semipublic (PS) and Medium Density C (RM-C) to Planned Development (PD); a Tentative Map (T24 00002) for the construction of 140 dwelling units within 22 structures; and a Development Plan (D24-00010), hereinafter referred to as the "project." The project site is an approximately 8.3-acre property identified as Assessor's Parcel Number 162-020-26-00 at 333 Garrison Street within the Loma Alta community of the City of Oceanside (City). Figure 1 shows the project's regional location and Figure 2 shows the project location on an aerial photograph.



 Project Location



 Project Boundary

FIGURE 2

Project Location on Aerial Photograph

The approximately 8.3-acre property includes relatively flat developable areas, with limited manufactured slopes at the edge of the property to the south descending approximately 5 to 10 feet to the existing multi-family residences below. The project site is east of Interstate 5 (I-5), south of State Route 76 (SR-76), west of El Camino Real, and north of Oceanside Boulevard. The project site is within a low vehicle miles traveled (VMT) area per the San Diego Association of Governments (SANDAG) VMT screening maps.

The project site is currently developed with a vacant school comprising approximately 10 abandoned school structures, playground equipment, and some miscellaneous maintenance materials. The project site has been unused for four years since it closed in 2019. The project would include demolition and removal of all structures and materials, along with the finish surfaces of the playground, prior to the start of grading for the proposed residential construction. The project proposes a total of 140 dwelling units within 22 three-story townhomes buildings ranging in size from approximately 1,320 square feet to 2,100 square feet. The proposed density would be 16.9 dwelling units per acre, which is consistent with the proposed Medium Density C Residential (MDC-R) designation. Additional residential amenities proposed on-site would include passive recreational fields, a dog park, and picnic areas. Figure 3 shows the project's Site Plan and Figure 4 shows the Project Impact Areas.

DISCRETIONARY APPLICATIONS

The project application includes a number of discretionary land use applications, as discussed further below.

General Plan Amendment

The current General Plan land use designation for the property is Civic Institutional (CI) and Medium Density C Residential (MDC-R). This designation does not allow for residential uses on the entire property, as the land use designations are largely intended to be applied to public and quasi-public uses and facilities. The change in the General Plan land use to Medium Density C Residential (MDC-R) for the entire property would allow for housing to be developed on the project site at an appropriate scale for the area and the size of the parcel.

Zoning Ordinance Amendment

The current zoning designation for the property is Public and Semipublic (PS) and Medium Density C (RM-C). This designation does not allow for residential uses on the entire property, as the Zoning designations are largely intended to be applied to public and quasi-public uses and facilities. As detailed in Article 17 of the City's Comprehensive Zoning Ordinance (CZO), the purpose of the Planned Development District (PD) includes (but is not limited) to the following: (A) establish a procedure for the development of parcels of land in order to reduce or eliminate the rigidity, delays, and inequities that otherwise would result from application of zoning standards and procedures designed primarily for small parcels; (B) ensure orderly and thorough planning and review procedures that will result in quality urban design; and (C) encourage variety and avoid monotony in large developments by allowing greater freedom in selecting the means to provide access, light, open space, and amenity (City CZO Section 1701).

Tentative Map

A Tentative Map is proposed to provide specific lot configurations for the project site. It is anticipated that the project would be developed in a single phase.

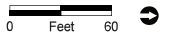
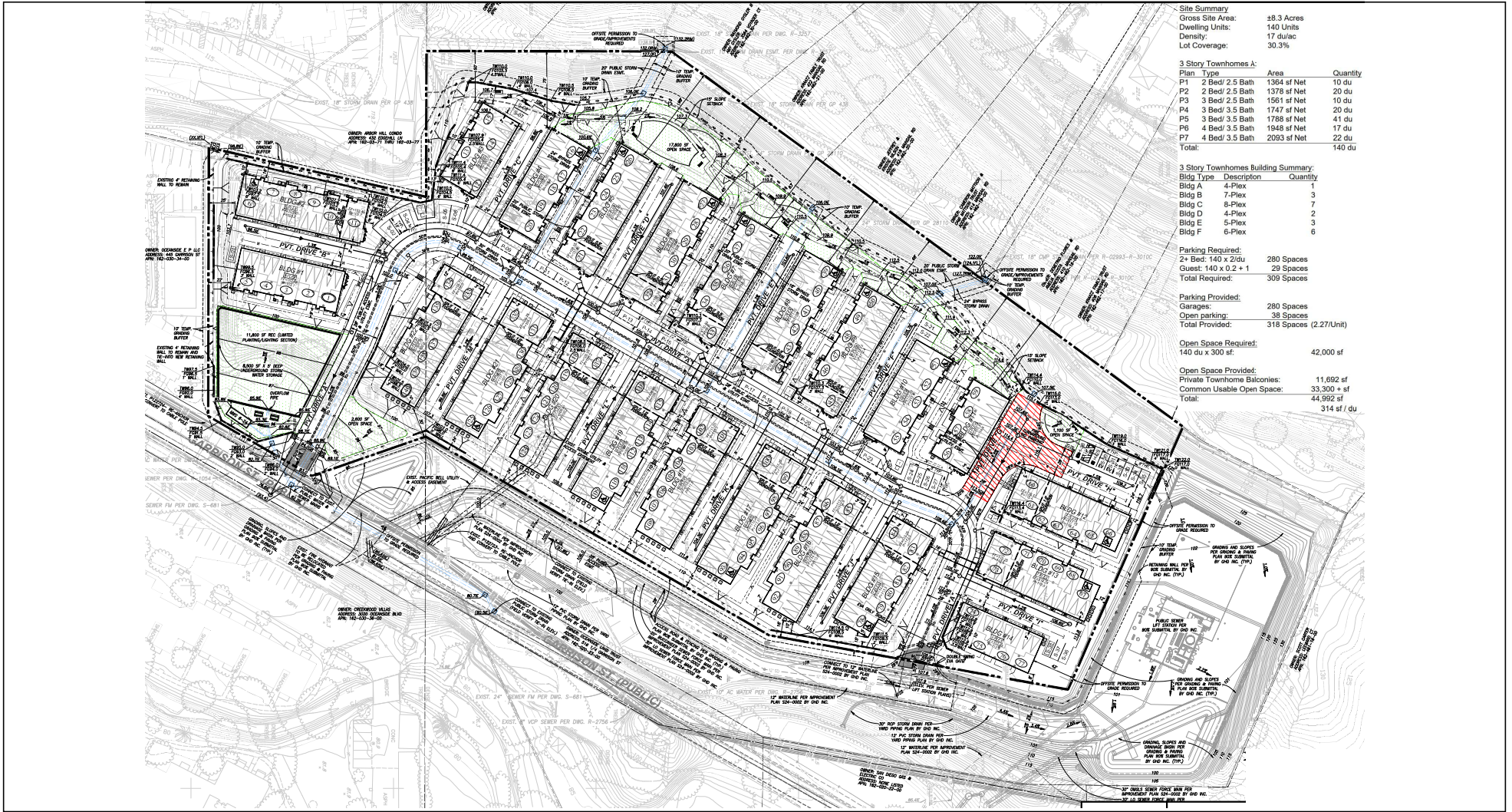






FIGURE 3
Site Plan



-  Project Boundary
-  On-site Project Impact Area
-  Off-site Project Impact Area
-  Off-site Access Road Grading

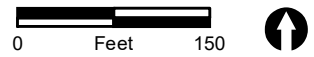


FIGURE 4
Project Impact Areas

Development Plan

As stated above, the project would amend the project site's General Plan land use designation to Medium Density C Residential (MDC-R) and would amend the zoning to Planned Development (PD). Consistent with Articles 17 and 43 of the City's CZO, a Development Plan requires the submittal of all relevant materials required for design review, including a Site Plan illustrating the new development adherence to all applicable zoning requirements. A Development Plan presents the proposed Site Plan configuration and project architecture along with additional information related to aesthetics, building orientation, landscaping and open space, and infrastructure. The Development Plan corresponds with the Tentative Map presenting the proposed building locations and conceptual grading elements of the planning area.

Planned Development Plan

In addition to the plans and materials required by Article 45 of the CZO for a zoning map amendment application, an application for rezoning to a Planned Development (PD) district is also required to include a Planned Development Plan (PDP).

The Oceanside Garrison Street PDP (RRM 2025) has been prepared in accordance with the City's CZO—Article 17. The PDP provides zoning, use regulations, and development standards applicable to the development of the project site and would serve as the project's regulating document going forward. The reliance on the project's PDP allows for creative design and development of the property site that would not be possible through the strict application of zoning regulations found in the City's CZO. The PDP acts as the development guide for the project, including direction for land uses, development intensities, development regulations, as well as design guidelines relating to materials and architecture. In alignment with the proposed General Plan land use designation of Medium Density C Residential (MDC-R), the project has been designed to be generally consistent with the development standards of the corresponding zoning designation Medium Density C (RM-C), including the minimum setbacks, open space, and parking requirements of this zone. However, the zoning designation of Planned Development is proposed to allow for minor deviations that would result in a more cohesive, compact, and pedestrian-friendly community. Table 1, Development Regulations Compliance Summary compares zoning regulations under the City's Medium Density C (RM-C) to the proposed Planned Development standards. For ease of reference, the differences between the Medium Density C (RM-C) and Planned Development have been summarized below.

Table 1 Development Regulations Compliance Summary				
	Medium Density C (RM-C) Zoning ¹	Planned Development Standards	Project Development Plan	Additional Standards/Notes
Density and Intensity				
Min. Site Area/Unit (sf)	2,000 sf	2,000 sf	2,583 sf	--
Max. Site Area/Unit (sf)	2,500 sf	2,500 sf		
Min. Density (du/ac)	15.1 du/ac	15.1 du/ac	16.9 du/ac	--
Max. Density (du/ac)	20.9 du/ac	20.9 du/ac		
Min. Lot Area (sf)	7,500 sf	7,500 sf	361,548 sf	--
Min. Lot Width (ft)	60 ft	60 ft	Approximately 995 ft	--
Min. Building Setbacks				
Front Yard (ft)	15 ft	15 ft	107 ft	--
Side Yard (ft)	5 ft	5 ft	7 ft	--
Corner Side Yard (ft)	10 ft	10 ft	10 ft	--
Rear Yard (ft)	15 ft	15 ft	15 ft	--

Table 1 Development Regulations Compliance Summary				
	Medium Density C (RM-C) Zoning ¹	Planned Development Standards	Project Development Plan	Additional Standards/Notes
Courts (ft)	Min. depth shall be half the height of the opposite wall but not less than 18 ft. opposite a living room and 12 ft. opposite a required window for any other habitable room.	Min. depth shall be half the height of the opposite wall but not less than 18 ft. opposite a living room and 12 ft. opposite a required window for any other habitable room.	20 ft	Measured building front to building front (front defined as the longest side of building).
Private Drive Aisle – Alley (ft)	0 ft	0 ft	3 ft	Measured from the face of garage door at ground level. Building projections allowed at upper stories so long as 24 ft private drive clearance is maintained.
Other Standards				
Max. Building Height (ft)	36 ft	40 ft or 3 stories	35 ft or 3 stories	Whichever is less; measured from finished adjacent grade top of the tallest roof or architectural feature.
Max. Coverage (%)	--	--	30.3%	--
Max. Fence and Wall Height (including retaining)	6 ft; 42 inches if in the front yard at the street	6 ft; 42 inches if in the front yard at street; retaining walls 8 ft max.	6 ft	--
Parking				
Garage	2 sp/unit (2 covered)	2 sp/unit (2 covered)	2 garage sp / unit	--
Guest	1 + 20% of total units = 29	1 + 20% of total units = 29	38	--
Vehicular Access Lane Width (ft)	24 ft; 28 ft for fire lanes	24 ft; 28 ft for fire lanes	24 ft; 28 ft for fire lanes	--
Useable Open Space				
Basic Requirement	300 sf/unit = 42,000 sf	300 sf/unit = 42,000 sf	44,992 sf = 314 sf/unit	--
Private Usable Open Space Min. Dimension for Deck and Balcony	5 ft	5 ft	5 ft	--
Common Usable Open Space	Min. 50% of total usable open space	Min. 50% of total usable open space	Min. 50% of total usable open space	--
Source: RRM 2025 RM-C = Medium Density C (RM-C); min. = minimum; max. = maximum; sf = square feet; du/ac = dwelling units per acre; ft = feet; in = inches; % = percent; sp = spaces ¹ Medium Density-C (RM-C), City of Oceanside, Zoning Ordinance				

PROJECT COMPONENTS

Construction

The proposed project would develop the project site as a single parcel. Construction is anticipated to begin in 2027 and last for approximately 16 months. The project would demolish all four existing buildings on-site (approximately 60,000 square feet). The preliminary grading design indicates that approximately 81,873 cubic yards of cut and fill would be necessary to balance the project site. In addition, off-site grading impacts along the northern edge of the project site along the adjacent City property are required to blend grades; this would result in approximately 100 cubic yards of cut. Grading associated with the off-site road providing emergency access to Private Drive "A" (described below under "Off-Site Improvements") would require approximately 5,208 cubic yards of cut, 221 cubic yards of fill, and 4,987 cubic yards of export. The proposed retaining walls along the property boundaries and along the foot of the existing slopes would allow for the construction of building pads, parking, and circulation areas. Retaining wall heights have been minimized to the extent practical, with landscaping incorporated in front of, and in some instances, above the retaining walls to soften their appearance.

Residences

The project would develop 140 dwelling units ranging in size from 1,364 square feet to 2,093 square feet on an approximate 8.3-acre lot at a density of 16.9 dwelling units per acre. The project comprises 22 buildings, featuring six distinct layout types: two variations of 4-plexes, along with 5-plex, 6-plex, 7-plex, and 8-plex configurations.

The project would meet the 15 percent inclusionary requirement per City Code of Ordinances Chapter 14C—Inclusionary Housing by reserving 10 percent of the total units (14 units) at a level affordable to moderate-income households as determined by Health and Safety Code Section 50093 (b), and through payment of a prorated Affordable In-Lieu Fee for the balance of the requirement. By being consistent with this regulation, the project qualifies for a five percent density bonus under California Government Code section 65915(b)(1)(A).

Architectural Design

Through its PDP, the project intends to provide a contemporary interpretation of the architectural styles found in existing residential neighborhoods surrounding the planning area. The project proposes two variations of a Contemporary architectural style with coastal influences. The project architecture would be modern and earth-toned, including brown and taupe stucco finishes with metal detailing and flat roofs. Designs would include flat roofs, primary wall materials of stucco and smooth horizontal siding, accent materials including woodgrain horizontal siding, brick veneer, metal railings and light fixtures, and unique primary entry doors. The community would be aesthetically connected throughout with some diversity of elevations and color modeling. Garages would be rear facing. Buildings would comprise two-, three-, and four-bedroom units with second- and third-floor balconies. Outdoor lighting would be included throughout the project site (RRM 2025).

Access/Circulation

Primary access to the project site is located near the terminus of Garrison Street, north of Oceanside Boulevard, and directly adjacent to the proposed City sewer lift station access road, which is to the north/northeast of the project site. Internal vehicular circulation would be provided by private drives, with primary access taken from Private Drive "A" off Garrison Street (see Figure 3). Private Drive "A" is proposed at 28 feet in width, would accommodate fire department requirements. Private Drive "A" would allow guest parking and provide access to smaller interior roads throughout the project site. Each interior road would also provide access to residential garages. Secondary access is proposed for emergencies only at the terminus of Private Drive A and would be located to the northeast of the project site, connecting to the City's sewer lift station access road.

On-site walkways connect to the public sidewalk at Garrison Street, allowing residents the opportunity to access nearby residential neighborhoods, churches, places of employment, open space amenities, transit, and commercial/retail land uses in the surrounding neighborhood. These on-site walkways provide an interconnected system through the project site and connect to various smaller paseos that lead to individual residential units. On-site walkways also provide convenient access for residents and their guests to access the common landscape area amenities.

Parking

The City's CZO requires multi-family developments to provide two parking spaces per dwelling unit to serve residents, of which a minimum of one parking space must be covered. The project meets this parking requirement by providing two parking spaces per dwelling unit and exceeds the covered space requirement by providing garages to house both parking spaces.

In addition, the City's CZO requires the provision of guest parking in an amount equal to 20 percent of the total number of dwelling units plus one. Based on the 140 units proposed, the project is required to provide 29 guest parking spaces ($140 \times 20\% = 28 + 1 = 29$). The project proposes 38 guest parking spaces, exceeding the minimum requirement by nine parking spaces. Guest parking spaces are distributed throughout the community to provide guest parking in proximity to each home and community amenity area. Of the 38 guest parking spaces, the project would include two accessible parking spaces, one of which would be van accessible parking space. Table 2, Parking Summary compares the City's parking requirement to the parking provided by the project.

Use	Parking Standard	Required Parking Spaces	Provided Parking Spaces
Attached Residential (Garage Parking)	2 spaces per 2 or more bedroom units	280	280
Guest Parking	Minimum amount equal to 1 space plus 20 percent of the total dwelling units	29	38
Total		309	318

SOURCE: Hunsaker & Associates 2025

Common Recreational Spaces

Pursuant to the City's CZO (Section 1050), property development regulations for residential districts require at least 300 square feet of total usable open space per dwelling unit. The project is therefore required to provide a total of 42,000 square feet of open space (140 dwelling units x 300 square feet = 42,000 square feet). A minimum of fifty percent of the total usable open space requirement is required to be common usable open space. The project provides both private useable and common useable open space as summarized in Table 3.

Type of Open Space	Square Feet
Private Useable Open Space (Townhome Balconies)	11,692
Common Open Space	33,300
Total Useable Open Space	44,992

SOURCE: Hunsaker & Associates 2025

As summarized in Table 3, the project would exceed the required usable open space requirement. Open Space areas are shown in the Site Plan (see Figure 3).

Common recreational spaces, including 33,300 square feet of common open space, will be designed with amenities such as active turf area to allow for a variety of activities, a dog run, picnic table and seating areas, walkways, and an informal lawn play area.

Landscape, Wall, and Fence Plans

Landscaping (proposed and natural) is proposed to cover approximately 39.2 percent of the project site (140,970 square feet). All landscaping improvements will follow City guidelines related to irrigation and water conservation. Plant palettes will include native and climate-appropriate species that reduce water demands and support birds, pollinator species, and other wildlife.

Thirty-eight on-site trees are proposed for removal and replacement due to poor conditions while three on-site trees would be preserved as shown on the Conceptual Landscape Plan (Figure 2.3 of the PDP; RRM 2025). Approximately 149 new trees would be planted on-site.

The project would include walls and fencing to serve a number of purposes including grading support, visual quality, and resident privacy. The following walls and fencing are proposed:

- Retaining Wall: 1-to-6-foot, tan-colored, block wall to be constructed in multiple locations throughout the project site
- Perimeter Screening Wall: Approximately 5-foot freestanding block wall along the southern, northern, and eastern perimeters of the project site
- Tube Steel Fence: 4-foot fence surrounding the dog park, and 5-foot fence along the western perimeter of the project site

Fire Management

The project has been designed to ensure a fire-safe development. Interior private roads provide adequate width and turning radius to allow fire and rescue vehicles to serve the project site. Private Drive "A" would connect to the access road that connects to Garrison Street, east of the proposed site driveway, to provide secondary emergency access. This access road is currently part of the City's Sewer Improvements Program Environmental Impact Report (SCH No. 2021030277) to provide primary access to the El Corazon Lift Station adjacent to the project site. The Applicant has an agreement to utilize this access road once built as a secondary emergency access to the project site per Fire Department requirements.

An existing fire hydrant is adjacent to the project entrance on Garrison Street, and six fire hydrants are proposed throughout the development, adjacent to building numbers 1, 4, 10, 12, 14, and 19. The water system has been designed to meet the City's minimum design flow requirement of 3,000 gallons per minute for two hours, with a minimum residual pressure of 20 pounds per square inch. (Appendix A).

Utilities and Services

Water and sewer services for the project site and area are provided by the San Diego County Water Authority. Electric and gas services for the project site and area are provided by San Diego Gas and Electric (SDG&E).

Water

The projected average water demand from the project would be 26,560 gallons per day (see Appendix A). Per the City's requirement, the on-site water system for the project would be private. Two connections would be made for both domestic service and fire protection service to the project site. Domestic and fire

connections would be made along the existing 10-inch water line in Garrison Street at the southern end of the project and domestic, and fire connections would be made along the proposed 12-inch water line (by others) at the northern end of the project. Both of the project's private domestic water system and private fire protection system would be connected at each location. The proposed water system is shown in Figure 5.

Domestic Meter Service

The preliminary water fixture count (WFU) for the project is estimated to be 30 to 35 WFUs per unit. Based on this WFU, the design demand for each alley's water meter sizing is estimated to be between 530 and 590 gallons per minute (gpm). Based on the meter capacities, the project would require two 3-inch meters, with a 700 gpm total capacity, that would be constructed per City specifications.

Private Fire Protection Service

The private fire protection system would consist of two double check detector assembly backflow preventers at each connection point and 10-inch diameter water lines throughout the project. The 10-inch diameter private fire protection system would sufficiently convey the projected 3,000 gpm fire flow requirement.

Sewer

Sewer infrastructure to service the project site is provided via on-site, private, gravity sewer lines that will connect to the existing 8-inch public gravity sewer lines within Garrison Street. This includes both 6-inch to 8-inch private gravity sewer lines. The projected average sewer flow from the project would be 19,600 gallons per day (Appendix B). The proposed sewer system is shown in Figure 6.

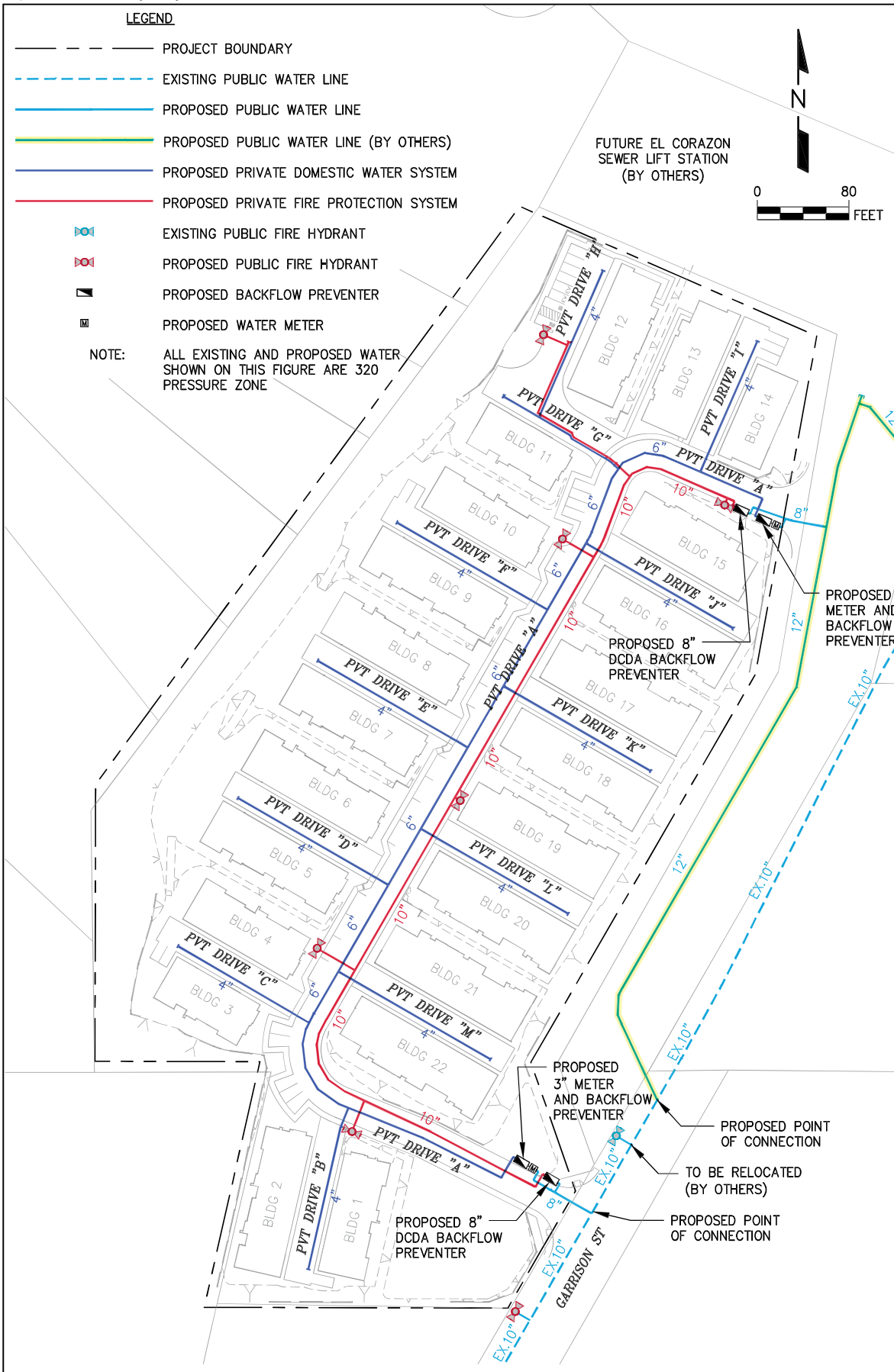


FIGURE 5
Proposed Water Infrastructure



Stormwater

Development of the project site would result in increased impervious surfaces (Appendix C). The project would include the construction of two underground dual storm drain systems: a private system and a public bypass system. The private system consists of ribbon gutters, curbs and gutters, and rolled curbs that capture on-site stormwater and convey it to inlets. These inlets direct stormwater to the south/southeast, where it would be routed to a new underground stormwater storage vault at the project's southern end.

The underground stormwater system includes a storm drain riser box with orifices and an internal weir designed to control the volume of stormwater conveyed through the system. The water quality flow is diverted to a Modular Wetland System unit, which removes pollutants before reconnecting to the downstream storm drain. Stormwater that exceeds the design water quality volume bypasses the Modular Wetland System unit through a secondary outlet within the riser box and merges with downstream flows after the vault. It is important to note that the underground vault does not infiltrate stormwater, as it includes a liner per Geotechnical recommendations to prevent infiltration. Flows conveyed through the system are ultimately discharged at a rate consistent with preconstruction conditions into the existing storm drainpipes crossing Garrison Street. These storm drainpipes release stormwater to an outfall on the adjacent property east of Garrison Street, which drains to Garrison Creek. The proposed Drainage Plan is shown in Figure 7.

Off-site Improvements

The project would include the following off-site improvements:

- Water lines connect at two locations to the existing 10-inch line in Garrison Street
- Sewer line would connect with the existing 8-inch line in Garrison Street
- Storm drain system connection to existing public storm
- Dry utility connections to existing infrastructure in Garrison Street
- Grading and installation of two outfalls from the 24-inch storm drain bypass on the western edge of the project site
- Grading of slopes along the northern edge of the project site
- Access road connecting to Private Drive "A"¹

¹ For purposes of the California Environmental Quality Act (CEQA) document, the grading and construction of the off-site road providing emergency secondary access to Private Drive "A" has been included within the project analysis. In the event that the City's Sewer Lift Station on the adjacent parcel to the northeast moves forward prior to the project, the City would be responsible for construction of the access road and implementation of appropriate mitigation measures. The City would then share the use of the road pursuant to the aforementioned fair-share agreement between the Applicant and the City.

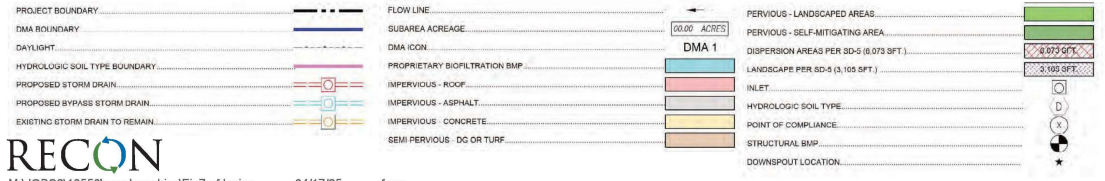
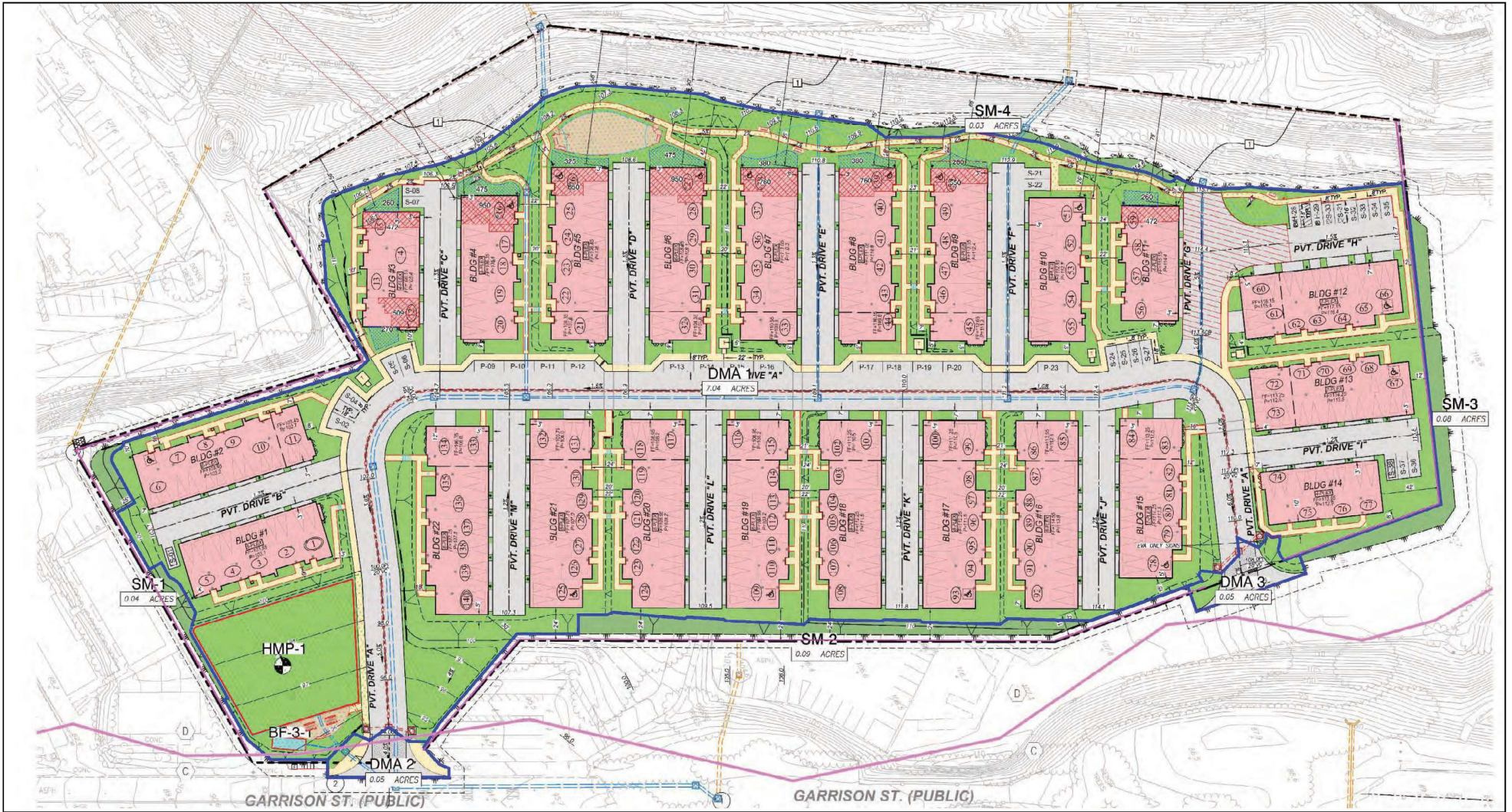


FIGURE 7
 Drainage Management Areas

Project Design Features

Several sustainable project design features (PDFs) would be implemented through compliance with design guidelines and/or through project conditions of approval. The project would be designed to meet or exceed building codes and standards in effect at the time of construction, including the California Building Code (CBC) which regulates water, material, and energy efficiency, and improved air quality. Applicable PDF that would facilitate the reduction of environmental impacts are detailed below:

- Exterior-to-interior noise analysis
- Fire resistant construction materials
- All electric development with no natural gas connections
- Installation of electric vehicle (EV) chargers within garages
- Installation of a photovoltaic solar electrical system for each building
- Undergrounding of all overhead utilities along the project frontage
- Use of permeable pavers
- Recommendations related to geotechnical considerations as detailed in Section 5 of the project's Geotechnical and Infiltration Evaluation (see Appendix J) including construction site stabilization and soil compaction, foundation design criteria, retaining wall construction design, pavement and concrete construction and design, and landscape maintenance
- San Diego Air Pollution Control District (SDAPCD) rules and regulations (Rules 50, 51, 52, 54, and 55) for controlling emissions from fugitive dust and fumes, as summarized here:
 - Water the grading areas a minimum of twice daily to minimize fugitive dust.
 - Provide sufficient erosion control to prevent washout of silty material onto public roads.
 - Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling.
 - Periodically sweep up dirt and debris spilled onto paved surfaces to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites of construction-related dirt.
- California Air Resources Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation. This regulation, which applies to all off-road diesel vehicles 25 horsepower or greater, limits unnecessary idling to five minutes, requires all construction fleets to be labeled and report to CARB, bans Tier 0 equipment and phases out Tier 1 and 2 equipment (thereby replacing fleets with cleaner equipment), and requires that fleets comply with Best Available Control Technology requirements.

REGULATORY SETTING

Federal

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (16 United States Code 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The Migratory Bird Treaty Act, which is enforced by United States Fish and Wildlife Service (USFWS), makes it unlawful "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird or attempt such actions, except as permitted by regulation. The applicable regulations prohibit the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations (50 Code of Federal Regulations [CFR] 21.11).

Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual

The Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018) recommends a daytime construction noise level threshold of 80 A-weighted decibels (dB[A]) 8-hour equivalent noise level ($L_{eq(8)}$) when detailed construction noise assessments are performed to evaluate

potential impacts to community residences surrounding a project. Although this guidance is not a regulation, it can serve as a quantified standard in the absence of such limits at the state and local jurisdiction levels. The FTA provides criteria for acceptable levels of groundborne vibration for various types of buildings. Structures amplify groundborne vibration; wood-frame buildings, such as typical residential structures, are more affected by ground vibration than heavier buildings.

State

Assembly Bill 52

Assembly Bill (AB) 52 requires lead agencies to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. If a project will result in an adverse effect to tribal cultural resources, the lead agency must consider measures to mitigate the impact.

California Public Resources Code

Section 5097 of the PRC specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American burial falls within the jurisdiction of the California Native American Heritage Commission (NAHC).

- Section 5097.5 No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.
- Section 5097.98 further defines the standards for the handling of Native American human remains.
- Section 5097.993 sets requirements for the unlawful and malicious excavation, removal, destruction, injury, or defacing of a Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources (CRHR).

California Government Code

California Government Code Sections 51175–51189 provide guidance for classifying lands in California as fire hazard areas and requirements for management of property within those lands. The California Department of Forestry and Fire Protection (CalFire) is responsible for classifying fire hazard severity zones (FHSZs) based on statewide criteria and makes the information available for public review. Further, local agencies must designate, by ordinance, very fire hazard severity zones (VHFHSZs) within their jurisdiction based on the recommendations of CalFire.

- Section 51182 of the California Government Code sets forth requirements for maintaining property within fire hazard areas, such as defensible space, vegetative fuels management, and building materials and standards. Defensible space around structures in fire hazard areas must consist of 100 feet of fuel modification on each side of a structure, but not beyond the property line unless findings conclude that the clearing is necessary to significantly reduce the risk of structure ignition in the event of a wildfire. Clearance on adjacent property shall only be conducted following written consent by the adjacent owner. Further, trees must be trimmed from within 10 feet of the outlet of a chimney or stovepipe, vegetation near buildings must be maintained, and roofs of structures must be cleared of vegetative materials. Exemptions may apply for buildings with an exterior constructed entirely of nonflammable materials.

California State Historical Building Code

Section 7050.5 requires that construction activities be stopped near discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC.

Section 7052 of the California Health and Safety Code makes the willful mutilation, disinterment, or removal of human remains a felony.

California Code of Regulations

Title 24 – California Building Code

The California Code of Regulations (CCR), Title 24, is referred to as the CBC. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility. The City has adopted the 2022 CBC by reference in its Code of Ordinances (Part I, Chapter 6, Article II, Section 6.6 Adoption by Reference).

For residential uses, interior noise levels for habitable rooms are regulated also by Title 24 of the CCR, California Noise Insulation Standards. Title 24, Chapter 12, Section 1206.4 of the 2022 CBC requires that interior noise levels attributable to exterior sources not exceed 45 Community Noise Equivalent Level (CNEL) in any habitable room within a residential structure. A habitable room is a room used for living, sleeping, eating, or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable rooms for this regulation.

Chapter 18 of the CBC addresses the requirement for geotechnical investigations to be conducted to ensure foundational studies and soil investigation support the proposed development. As further detailed in Chapter 18, Section 1803.6 a Geohazard report is also required for all development to identify geologic and seismic conditions that may require project mitigations.

The Title 24, Part 6 is the Energy Efficiency Standards or California Energy Code. This code establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC).

California Green Building Standards

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 CBC). The most recent 2022 CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of nonresidential and residential structures.

Quimby Act and Assembly Bill 1359

The Quimby Act, which is within the state's Subdivision Map Act, authorizes the legislative body of a city or county to require the dedication of land or impose fees for park or recreational purposes as a condition to the approval of a tentative or parcel subdivision map, if specified requirements are met. One of these requirements is that the dedicated land or fees, or combination thereof, shall be used only for the purposes of developing or rehabilitating neighborhood or community park or recreational facilities to serve the subdivision for which the land was dedicated, or fees were paid. The act provides that the dedication of land or the payment of fees, or both, shall not exceed the proportionate amount necessary to provide three acres of park area per 1,000 persons residing within a subdivision subject to the act, except as specified.

Senate Bill 743: California Environmental Quality Act Transportation Analysis Changes

Under Senate Bill (SB) 743, the focus of transportation analysis will shift from driver delay to reduction of vehicle miles traveled, and the associated reductions in greenhouse gas (GHG) emissions, creation of multimodal networks, and promotion of a mix of land uses. SB 743 requires the Governor's Office of Planning and Research to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts.

Regional*San Diego Forward: The 2021 Regional Plan*

SANDAG is the regional authority that creates region-specific documents to provide guidance to local agencies, as SANDAG does not have land use authority. SANDAG's *San Diego Forward: The 2021 Regional Plan* (2021 Regional Plan; SANDAG 2021) is a long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The purpose of the Regional Plan is to provide direction and guidance on future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout San Diego County as stipulated under SB 375. The Regional Plan establishes a planning framework and implementation actions that increase the region's sustainability and encourage "smart growth while preserving natural resources and limiting urban sprawl." The Regional Plan encourages an increase in residential and employment concentrations in areas with the best existing and future transit connections, and preservation of important open spaces. The focus is on implementation of basic smart growth principles designed to strengthen the integration of land use and transportation.

The Regional Plan also addresses border issues, providing an important guideline for communities bordering Mexico. In this case, the goal is to create a regional community where San Diego, its neighboring counties, tribal governments, and northern Baja California mutually benefit from San Diego's varied resources and international location.

San Diego Air Pollution Control District Rules and Regulations

Regulation 4, Rules 50, 51, 52, 54, and 55 for controlling emissions from fugitive dust and fumes:

- Rule 50 (Visible Emissions) prohibits any activity that will create air contaminant emissions darker than 20-percent opacity for more than an aggregate of three minutes in any 60-minute period.
- Rule 51 (Nuisance) Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property.
- Rule 52 (Particulate Matter) prohibits discharge into the atmosphere from any source particulate matter in excess of 0.10 grain per dry standard cubic foot (0.23 gram per dry standard cubic meter) of gas.
- Rule 54 (Dust and Fumes) prohibits discharge in any one hour into the atmosphere from any source dust or fumes, including lead and lead compounds, within any one hour, with the exact limits defined in a corresponding table within the rule itself; meaning any facility subject to this rule must monitor and control their emissions to stay below the specified levels of particulate matter to avoid violations.
- Rule 55 (Fugitive Dust Control) regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site.

California Air Resources Board In-Use Off-Road Diesel-Fueled Fleets Regulation

CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation applies to all self-propelled off-road diesel vehicles of 25 horsepower or greater used in California, and most two-engine vehicles. The regulation is aimed at reducing emissions of diesel particulate emissions.

North County Multiple Habitat Conservation Program

The North County Multiple Habitat Conservation Program (MHCP) is a comprehensive conservation planning process that addresses the needs of multiple plant and animal species in Northwestern San Diego County. The MHCP encompasses the cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista. Its goal is to conserve approximately 19,000 acres of habitat, of which roughly 8,800 acres (46 percent) are already in public ownership and contribute toward the habitat preserve system for the protection of more than 80 rare, threatened, or endangered species. The MHCP sets forth general and subarea conditions of coverage that must be met for each covered species for the cities to obtain take authorization. Each MCHP encompassing city must adopt subarea plans and implement agreements with the California Department of Fish and Wildlife (CDFW) and USFWS before incidental take permits can be issued.

Draft Subarea Habitat Conservation Plan

The draft Oceanside Subarea Plan (SAP) was prepared per the state of California's Natural Community Conservation Planning Act of 1991 and the Endangered Species Act. In 1996, the City began subarea planning to better define conservation priorities within the City and developed a draft SAP under the subregional umbrella of the MHCP. The approach was to identify a citywide preserve system that met local and regional biological goals, while minimizing fiscal and economic impacts to the City and adverse effects on private property rights or property values. Although the draft SAP was circulated for public review in 2004 and revised in 2009, it has not been approved. Due to the prohibitive cost of program management and a lack of adequate implementation funding and staff resources, the City has decided not to pursue formal adoption of the draft SAP. Nevertheless, the City utilizes the draft SAP as a guide for habitat preservation and restoration in conjunction with new private development and Capital Improvement Programs (CIPs; see Section 4.5, below). The most critical SAP strategies include the creation of habitat preserve areas, wildlife crossing zones, mitigation ratios for impacts to biological resources.

State General Construction Stormwater Permit

Stormwater runoff from construction activity that results in soil disturbances of at least one acre of total land area (and projects that meet other specific criteria) is governed by the California State Water Resources Control Board (SWRCB) under Water Quality Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-0006-DWQ), National Pollutant Discharge Elimination System (NPDES) Permit No. CAS000002. This permit regulates discharges of stormwater and non-stormwater from construction projects. The nine individual Regional Water Quality Control Boards (RWQCBs) enforce the General Construction Stormwater Permit for projects within their region. It is the construction site owner or landowner's responsibility to obtain coverage under this General Permit prior to commencement of construction activities. To obtain coverage, the operator or owner must file a Notice of Intent with a vicinity map and pay the appropriate fee with the SWRCB. The General Permit outlines the requirements for preparation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is a document created to define and control the handling of stormwater runoff from a construction site. The SWPPP identifies construction Best Management Practices (BMPs), which are implemented during the construction phase of development. All future projects that would be disturbed by development exceeding one acre would be required to comply with the General Construction Stormwater Permit.

San Diego County Airport Land Use Commission

The San Diego County Airport Land Use Commission (ALUC) prepares airport land use compatibility plans (ALUCP) in order to promote compatibility between airports and the land uses surrounding them. ALUCPs set compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances. The Oceanside Municipal Airport ALUCP was prepared in 2010 and provides noise level contours and noise compatibility criteria for various land uses.

Airport Land Use Consistency Plan

The purpose of an ALUCP is to provide for the orderly growth of airports and the areas surrounding airports, and to safeguard the general welfare of inhabitants within an airport's vicinity. An ALUCP addresses compatibility between airport operations and future land uses that surround them by providing policies and criteria for aircraft overflight, noise, safety, and airspace protection, to both minimize the public's exposure to excessive noise and safety hazards within the Airport Influence Area (AIA) that could affect airspace and/or overflight concerns. Any proposed land use plan amendments or rezones within an AIA are required by state law to be submitted to the Airport Land Use Commission for a consistency determination with the ALUCP.

Local

City Comprehensive Zoning Ordinance

The City's CZO is an implementation tool for the General Plan and provides permitted land uses and development standards for each land use category. The Zoning Ordinance establishes zoning designations or classifications, each with a list of permitted uses and standards for building setbacks, densities, heights, and other design considerations. The Zoning Ordinance establishes multiple base districts, as well as nine overlay zoning districts, each of which includes land use and development standards.

- Article 10 Residential Districts
- Article 17 PD Planned Development District
- Article 30 Site Regulations
- Article 31 Off-Street Parking and Loading Regulations
- Article 40 Environmental Review
- Article 43 Development Plan Review
- Article 45 Amendments

City Code of Ordinances

- Chapter 6 Building Construction Regulations: The City adopts by reference 2016 CALGreen in Chapter 6, Article XIII. Chapter 6 also addresses rooftop solar energy systems (Article XIV) and EV charging stations (Article XV).
 - Chapter 6 Section 6.1 specifically adopts the 2022 CALGreen as the City's building construction regulations. Additionally, Section 6.8 adopts CALGreen as the City's regulatory standards.
- Chapter 11 Fire Prevention: The City adopts the California Fire Code and incorporates local amendments based on geographical, climatological, and topographical factors, as the governing regulations for the safeguarding of life and property from fire and explosion hazards arising from the storage, handling and use of hazardous substances, materials and devices, and from conditions hazardous to life or property in the occupancy of buildings and premises and in the erection,

construction, enlargement, alteration, repair, moving, removal, conversion, demolition, equipment use, and maintenance of buildings and structures.

- Chapter 13 Solid Waste and Recycling addresses solid waste and recycling and includes regulations requiring new and substantially remodeled commercial, industrial, and multi-family residential uses to be designed to include space for storage and collection of recyclable materials on the premises (Article II) and incorporates regulations prohibiting single use carry-out bags (Article IV).
- Chapter 32B of the City's Code of Ordinances covers all impact fees imposed by the City as a condition of development approval for the purpose of financing capital improvements, the need for which is attributable to such development, unless expressly exempted. Fees include (d) park fees imposed pursuant to Ordinance No. 91-10 and (e) park fees imposed pursuant to Article 40 of the Zoning Regulations.
- Chapter 32B of the City's Code of Ordinances covers all impact fees imposed by the City as a condition of development approval for the purpose of financing capital improvements, the need for which is attributable to such development, unless expressly exempted. Chapter 32B applies to the imposition of fees by the City as a condition of development approval for the purpose of financing CIP, the need for which is attributable to such development. Impacts fees are imposed for sewer and water connections (pursuant to Code of Ordinance Chapters 29 and 37, respectively), and drainage fees. Fees include (d) park fees imposed pursuant to Ordinance No. 91-10 and (e) park fees imposed pursuant to Article 40 of the Zoning Regulations.
- Chapter 32C Public Facility Fee Requirements: The Code of Ordinances includes provisions for the assessment of public facility fees as a condition of issuing building permits. The public facility fees regulate community growth and ensure that new development pay impact fees for new public facilities.
- Chapter 32D of the City's Code of Ordinances outlines provisions that apply to all development within the City by which additional residential lots and/or dwelling units are created.
- Chapter 37 contains rules and regulations related to the governing of use and consumption of water.
- Chapter 38 Noise Control Ordinance: The Noise Control Ordinance establishes noise level limits for stationary sources. Noise level limits are specific to base district zones such as residential zones, commercial zones, etc. Except for exempted activities, it is unlawful for any person to cause or allow the creation of any noise in excess of applicable noise level limits at or beyond the property boundary. When property lines form the joint boundary of two zones, the sound level limit shall be the arithmetic mean of the limit applicable to each of the zones. The Noise Control Ordinance regulates the timing of construction activities and includes special provisions for sensitive land uses. Section 38.17(h) of the Noise Control chapter prohibits construction between the hours of 10:00 p.m. and 7:00 a.m. Monday through Saturday. No construction activities shall occur outside of these hours, on Sundays, or federal holidays.
- Chapter 39 contains the City's light pollution and light installation regulations, detailing lighting standards, such as lamp types allowed, shielding requirements, and hours of operation for certain lighting types.
- Chapter 40 Urban Runoff Management and Discharge Control Ordinance: The overall intent of this ordinance is to protect water resources and to improve water quality. The Urban Management and Discharge Control Ordinance includes compliance with current and applicable RWQCB discharge

permits, requirements for discretionary approvals subject to discharge control, development of Urban Runoff Standards Manuals, and designations for permitted use of collected stormwater.

- Article IX Floodplain Management Regulations: The purpose of this article is to protect against damage and loss associated with flood conditions. Specifically, development within flood prone areas is subject to floodplain management regulations to provide standards for preventing and reducing flood loss and damage. Identified Special Flood Hazard Areas are those having special flood, mudslide, mudflow or flood-related erosion hazards, and shown on a flood boundary and floodway maps prepared by the Federal Emergency Management Agency (FEMA). As applicable, City regulations mandate all Letter of Map Revisions required for flood control projects are to be approved by FEMA prior to the issuance of building permits.

Historical Preservation Ordinance

Per the City's Historical Preservation Ordinance (Code of Ordinances Chapter 14A), the City's policy is to recognize, preserve, enhance, perpetuate and use structures, landscape features, sites, and areas with the city with historical, architectural, archaeological, cultural or aesthetic significance in the interest of the economic prosperity, cultural enrichment and general welfare of the people. In order to protect such resources, a resource may be designated a historical area or site if it meets the following criteria:

- It exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, or architectural history; or
- It is identified with persons or events significant in local, state, or national history; or
- It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
- It is representative of the notable work of a builder, designer, or architect; or
- It is found by the council to have significant characteristics which should come under the protection of this chapter.

Grading Regulations Manual (Grading Ordinance)

The City's Grading Ordinance establishes a set of standards regulating the design and construction of building sites and the development of property by grading; to regulate the alteration of the ground surface; to minimize differential settlement and the slipping or sliding of the earth; and to require engineering analysis of expansive soil conditions, erosion control, and drainage.

Drought Response Ordinances

The City has two ordinances in place that establish procedures for long- and short-term water shortages, the Water Conservation Program and Drought Response Conservation Measures for Mandatory Water Reduction (Ord. No. 09-OR0439-1) and Updated to Water Conservation Program and Drought Response Conservation Measures (Ord. No. 15-OR0276-1). Ordinance No. 08-OR0439-1 establishes four levels of drought response actions, with increasing restrictions on water use in response to decreasing available supplies. Ord. No. 15-OR0276-1 was implemented in 2015 in response to Governor Brown's 2014 state of emergency proclamation for drought and the 2015 Executive Order (EO) for 25 percent reduction of water use statewide.

*Adopted General Plan*Community Facilities Element (CF Element)

The CF Element addresses issues related to public services, community facilities management, the provision of parks and recreation facilities, library facilities, fire department facilities, and police facilities. Policies related to these resources include:

Community Facilities

- **Policy 0.4:** Community growth shall be managed in order that new residents who pay impact fees for new public facilities and services will benefit from those facilities and services within a reasonable period of time after paying the fees.
- **Policy 0.7:** Capital improvement fees shall be collected at the time a building permit is issued and shall be based on the proportionate share of the costs of capital improvement needs represented by the proposed development.

Fire Department Facilities

- **Policy 3.1:** The City of Oceanside shall strive to provide adequate Fire Department facilities through the achievement of the following facilities and service standards:
 - A five-minute response time from fire stations to all developed areas within the City;
 - Personnel staffing at a minimum of four people per company;
 - City-maintained staffing levels adequate to achieve a locals desirable Insurance Service Office rating; and
 - A maximum response time for paramedic units of eight minutes in urban areas and 15 minutes in rural areas.
- **Policy 3.5:** Close coordination shall be maintained between planned improvements to the Circulation System within the City and the location of future fire stations, in order to assure adequate levels of service and response times to all areas of community along existing and future arterials, collectors, and local streets.
- **Policy 3.7:** Future fire station sites and facilities shall be closely coordinated with existing and planned public parks, libraries, police substations, and other activity centers in order to encourage implementation of the community facilities campus concept.
- **Policy 3.10:** In order to minimize fire hazards, the Oceanside Fire Department shall be involved in the review of development applications. Consideration shall be given to adequate emergency access, driveway widths, turning radii, fire hydrant locations, and needed Fire Flow requirements.

Police Department Facilities

- **Policy 4.3:** The City of Oceanside Police department shall strive to provide a maximum response time of five (5) minutes for all Priority I and II emergency service calls.
- **Policy 4.9:** Police operations, including proactive and reactive law enforcement and administration efforts, shall be expanded as the City's population grows, and the City shall evaluate the quality of police services on an annual basis. This evaluation shall focus on staffing and facilities, including assessing the need for additional police substations relative to changing conditions within the City.

- **Policy 4.11:** Future police facilities sites shall be closely coordinated with existing and planned public parks, libraries, fire stations, and other activity centers in order to encourage the implementation of a community facilities campus concept.

Sanitary Sewer

- **Policy 5.4:** New development shall be responsible for on-site facility improvements required by that development.

Water Supply

- **Policy 5.9:** Throughout the community, the City shall systematically expand water storage capabilities and service line distribution systems to keep pace with growth projections of the adopted General Plan.
- **Policy 5.11:** New development shall be responsible for on-site water facilities improvements required by that development.

Stormwater Management System

- **Policy 6.2:** All new development in the City shall pay drainage impact fees to defray that development's proportionate share of drainage facilities serving the basin where the new development is located.
- **Policy 6.3:** The City shall continue to participate in the National Flood insurance Program. Any development application for construction within the 100-year floodplain shall be reviewed to ensure that the project complies with flood protection measures required by the National Flood insurance Program. For existing developed areas within the 100-year floodplain, these same measures and standards shall be applied if the City approval of substantial improvements or upgrades is sought.
- **Policy 6.4:** To the degree that it is economically feasible and consistent with sound engineering practices and maintenance criteria, the City shall discourage disruption of the natural landform and encourage the maximum use of natural drainage ways in new development. Non-structural flood protection methods, which avoid major construction programs such as channels and favor vegetative measures to protect and stabilize land areas, should be considered as an alternative to constructing concrete channels where feasible.
- **Policy 6.7:** The City shall require appropriate and sufficient screening, fencing, landscaping, open space setbacks, or other permanent mitigation or buffering measures between drainage way corridors and adjacent surrounding land uses. The employed measures shall be of sufficient scope to minimize, to the maximum extent possible, negative impacts to adjacent surrounding land uses from the particular drainage way corridor.
- **Policy 6.9:** The City shall comply with the sections of the Federal Clean Water Act in regard to stormwater drainage.

Circulation System

- **Policy 12.3:** The City shall set a goal of LOS "C" on street segments with a corresponding LOS "D" at intersections during AM and PM peak periods in new, urbanized areas of Oceanside. In older and more densely developed areas of the community, generally west of Interstate 5, it may not always be possible to achieve these levels of service due to existing patterns of development.

- **Policy 12.5:** Private land developers will continue to be responsible for constructing adjacent and internal Arterial Streets, Collector Streets, and Local Streets necessary to provide access and internal service to their subdivisions in a manner consistent with City standards. Developers will be required to contribute to and correct off-site impacts for local streets, collectors, and arterials to insure and maintain a smooth, functional, and safe circulation system.
- **Policy 12.8:** The City shall encourage the comprehensive development of pedestrian sidewalks, pathways, and trails throughout the community.

Environmental Resources Management Element

Objectives included in the Environmental Resources Management Element (ERM) relevant to the project include the following:

- Encourage the preservation of significant visual open spaces when such preservation is in the best interest of the public health, safety, and welfare. ERM Table ERM-2 and Figure ERM-8 provides an inventory of areas which serve as open space, and which are currently dedicated or restricted in some manner to ensure preservation.
 - Garrison Street Elementary School is listed as Existing Open Space (#42 in Table ERM-2).
- Continued cooperation with county, state, and federal agencies in continuing programs of air quality improvement. This includes the development and updating of a Regional Air Quality Strategy (RAQS) in coordination with the SDAPCD. The ERM notes that development should implement regulations and controls of the SDAPCD, including dust control measures, to protect the health and wellbeing of the surrounding community.
- Conservation and enhancement of vegetation and wildlife habitat, especially areas of rare, endangered, or threatened species. The ERM notes that several areas of significance to these resources are generally found in the wetland regions and in particular, along the San Luis Rey River and the Buena Vista Lagoon.
 - The project site is not located within these areas of significance.
- Conservation and protection of significant cultural resources for future scientific, historic, and educational purposes. To achieve this objective, the City encourages the use of "O" zoning and open space easements for the preservation of cultural sites, the acquisition, restoration, and maintenance of significant historical sites, and the investigation by appropriate groups to explore and record significant archaeological sites in the area for inclusion in the San Diego County Natural Resource Inventory.
 - The project site is not a known cultural site.
- Minimization of pollution of water supplies, including lakes, rivers, streams, lagoons, and groundwater. It also includes the objective of minimizing the loss of life and property in flood prone areas.

Energy and Climate Action Element

The City's Energy and Climate Action Element (ECAE), adopted in 2019, provides policy direction for energy efficiency and renewable energy. The ECAE's policies related to residential energy include:

- **Policy ECAE-1a-2:** Require that new development supply a portion of its energy demand through renewable sources, to the extent practical and financially feasible.

- **Policy ECAE-1c-2:** Encourage passive solar building design in new development.

Housing Element

Consistent with state law, the City recently updated the General Plan Housing Element to serve the planning period of 2021-2029. The Housing Element evaluates City demographics, housing resources, and constraints on development to provide a detailed inventory of potential sites to serve projected housing needs. The Housing Element includes a Housing Action Plan which contains goals and policies to address housing-related issues during the 2021-2029 planning period. The primary goal of the Housing Action Plan is to ensure that reasonable housing is available at a cost that is affordable to all current and future residents.

Land Use Element

The Land Use Element (LUE) contains policies related to residential development including those that ensure compatible land uses, to not create negative visual impacts, to not subject people to potential sources of objectionable noise, light, odors, and other emissions, to encourage the development of a variety of housing opportunities, to produce opportunities for decent and affordable housing, to ensure that housing is developed in areas with adequate access to employment opportunities, community facilities, and public services. The following LUE sections and policies are relevant to the project:

- 1.1 Community Values
 - **Policy 1.1.B:** Land uses shall not significantly distract from nor negatively impact surrounding conforming land uses.
- 1.12 Land Use Compatibility
 - **Policy 1.12.B:** The use of land shall not create negative visual impacts to surrounding land uses.
 - **Policy 1.12.C:** The use of land shall not subject people to potential sources of objectionable noise, light, odors, and other emissions nor to exposure of toxic, radioactive, or other dangerous materials.
- 1.14 Noise Control
 - **Policy 1.14.A:** Noise emissions shall not reach levels that poses a danger to the public health.
 - **Policy 1.14.B:** Noise emissions shall be controlled at source where possible.
 - **Policy 1.14.C:** Noise emissions shall be intercepted by barriers or dissipated by space where the source cannot be controlled.
 - **Policy 1.14.D:** Noise emissions shall be reduced from structures by the use of soundproofing where other controls fail or are impractical.
 - **Policy 1.14.E:** Acceptable noise levels shall be demonstrated by the applicant in the review and approval of any projects or public or private activities that require a permit or other approval from the City.

- 1.152 Seismic and Geologic Hazards
 - **Policy 1.152.A:** The City shall consider seismic and geologic hazards when making land use decisions, particularly in regards to risk sensitive land uses as defined in the Public Safety Element.
 - **Policy 1.152.D:** The City shall require expanded soils and geologic testing and necessary engineering precautions when deemed necessary to reduce risks to acceptable levels. Wave action, erosion, and geotechnical reports shall be required as determined necessary.

- 1.16 Housing
 - **Policy 1.16.B:** The City shall strive to produce opportunities for decent and affordable housing in a pleasant environment for all of Oceanside's citizens.
 - **Policy 1.16.C:** The City shall ensure that housing is developed in areas with adequate access to employment opportunities, community facilities, and public services.
 - **Policy 1.16.D:** The City shall encourage development of a variety of housing opportunities, with special emphasis on providing:
 - 1) A broad range of housing types, with varied levels of amenities and number of bedrooms;
 - 2) Sufficient rental stock for all segments of the community, including families with children, and
 - 3) Housing which meets the special needs of the elderly and the handicapped.
 - **Policy 1.16.E:** The City shall protect, encourage and where feasible, providing housing opportunities for persons of low and moderate income.

- 1.17 Public Facilities Management
 - **Policy 1.17.A:** Residential, commercial, and industrial development throughout the City shall be coordinated to ensure that adequate public services and facilities are provided to serve future development.
 - **Policy 1.17.B:** Land use and development review applications that are inconsistent with the capability of any public service agencies to provide cost-effective services shall not be approved.

- 1.2 Site Design
 - **Policy 1.2.A:** The placement of all proposed structural components, landscaping, accessways, etc. shall be oriented on the site in such a manner to maximize:
 - 1) Interior building absorption and retention of solar energy during appropriate seasons and times of day, and the access to sunlight for potential solar energy collection; and
 - 2) The even circulation of natural breezes between and through all buildings; and
 - 3) The quality of view and vistas from the site to the surrounding environment; and
 - 4) The quality of views and vistas of the site from surrounding land uses; and
 - 5) The public safety by eliminating designs that may harbor or hide detrimental activities.
 - **Policy 1.2.F:** The City shall encourage plans that maximize convenient, safe, and efficient design features for future residents of the project.
 - **Policy 1.2.G:** All developments shall design parking areas to maximize efficiency, safety, convenience, and open space.
- 1.21 Common Open Space
 - **Policy 1.21.A:** Common open space must be accessible and usable by potential users of the common open space.
- 1.22 Landscaping
 - **Policy 1.21.C:** Drought-tolerant materials, including native California plant species, shall be encouraged as a landscape type.
 - **Policy 1.21.E:** The City shall encourage the inclusion of greenbelts and common open space for pedestrian use in residential developments.
- 1.23 Architecture
 - **Policy 1.23.A:** Architectural form, treatments, and materials shall serve to significantly improve on the visual image of the surrounding neighborhood.
 - **Policy 1.23.B:** Structures shall work in harmony with landscaping and adjacent urban and/or topographic form to create an attractive line, dimension, scale, and/or pattern.
 - **Policy 1.23.C:** Elevations, floor plans, perspectives, lines-of-sight, material boards, and other such displays and exhibits shall be provided as necessary to ensure compliance with General Plan policies.
 - **Policy 1.23.J:** Potential hazards of flooding, erosion and sedimentation shall be reduced by designing the site drainage system to accommodate the existing upstream storm runoff and to coordinate with existing downstream conditions.

Noise Element

The Noise Element includes policies related to compliance with the City's Noise Ordinance, to control noise at the source where possible or intercepted where the source cannot be controlled, to consider noise levels in the approval of any discretionary projects, and to reduce noise to acceptable levels. Specific policies relevant to the project include the following:

- Noise levels shall not be so loud as to cause danger to public health in all zones except manufacturing zones where noise levels may be greater.
- Noise shall be controlled at the source where possible.
- Noise shall be intercepted by barriers or dissipated by space where the source cannot be controlled.
- Noise shall be reduced from structures by the use of soundproofing where other control fail or are impractical.
- Noise levels shall be considered in the approval of any projects or activities, public or private, which requires a permit or other approval from the City.

Public Safety Element

The Public Safety Element includes objectives related to seismic and geologic hazards, the consideration of flooding hazards in land use decisions and ensuring public awareness of existing flood hazards, and public services, especially related to fire protection. Specific policies relevant to the project include the following:

- Seismic and Geologic Hazards
 - Minimize the risk of occupancy of all structures from seismic and geologic occurrences
- Flooding Hazard
 - Consider the potential for flooding when making land use decisions.

Climate Action Plan

The General Plan ECAE and Climate Action Plan (CAP) were prepared together and adopted in tandem in May 2019 (City of Oceanside 2019a and 2019b). The ECAE builds on the GHG emission inventories, emissions targets, reduction measures, and implementation actions identified in the CAP. The CAP provides GHG reduction strategies through a series of measures regarding energy and buildings, water and wastewater, solid waste, transportation and land use, and agriculture and forestry.

Zero Waste Resolution and Zero Waste Strategic Resource Management Plan

In 2010, the City adopted Zero Waste as a goal by resolution in order to eliminate waste and pollution in the manufacture, use, storage, and recycling of materials. The resolution included a milestone goal to reach 75 percent landfill diversion by the year 2020. In June 2012, the City passed a Zero Waste Strategic Resource Management Plan that has allowed the City to implement programs and provide resources to the community that has increased the City's diversion rate.

Emergency Operations Plan

The City Emergency Operations Plan (EOP) forms the basis for the conduct and coordination of emergency operations within the City. The EOP provides a system for the effective management of emergency situations; identifies lines of authority and relationships; assigns tasks and responsibilities; ensures adequate facilities, services, and resources; and provides a framework for adequate resources for recovery operations.

Public Library Strategic Plan Update 2021-2023

The Public Library Strategic Plan Update 2021-2023 (Strategic Plan) is the second strategic plan developed by the City. The first focused on literacy programming, employee training, and increasing awareness of the library culture. The Strategic Plan focuses on remaining issues including access to technology and expansion. Theme 3, Expansion, provides goals for plans to expand library spaces.

Parks and Recreation Master Plan

The Parks and Recreation Master Plan provides guidelines for the orderly development of future park, recreation, and open space facilities and programs to meet the community's current and future needs. The Master Plan is intended to provide a realistic view of the City's parks and recreation system and to develop a vision for the parks and recreation system through 2030.

Thoroughfare and Traffic Signal Fee Program

The City has adopted a Thoroughfare and Traffic Signal Fee Program, with the most recent update to the fees being July 1, 2017. This is based on Resolution No. 16-R0324-1, adopted May 18, 2016. The traffic signal fee was established by Ordinance No. 87-19, while the thoroughfare fee was established by Ordinance No. 83-01. The purpose of the Thoroughfare and Traffic Signal Fee Program is to finance the construction of roads, bridges, and traffic signals.

City of Oceanside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service

City of Oceanside Traffic Impact Analysis Guidelines (TIAG), adopted 2020, provides City-specific guidelines to adhere to SB 743 which replaces the analysis of LOS with VMT for projects qualifying to meet documentational requirements under CEQA.

Pedestrian Master Plan

The Pedestrian Master Plan aims to guide how the City plans and implements pedestrian projects, including projects to enhance neighborhood quality or mobility options by providing pedestrian improvement projects.

Bicycle Master Plan

The Bicycle Master Plan evaluates the City's existing bikeway facility system and its relationship with other systems, such as mass transit, and recommends improvements wherever appropriate. Additionally, the goal of the Bicycle Master Plan is to maximize the efficiencies offered by multi-modal connections between mass transit and bikeways as well as to promote a viable alternative to the automobile travel in a climate particularly conducive to bicycle transportation.

Engineers Design and Processing Manual

The City Engineering Design Manual serves to establish procedures and minimum standards for various plans and documents submitted to and processed by the Engineering Department. The standards presented in the manual govern the processing of subdivision maps and related documents as well as

public and private improvement and grading plans. The Manual specifically addresses the standards for preparation of Erosion Control Plans.

Stormwater Quality Assessment

Prior to project submittal all development and redevelopment projects applying for discretionary or administrative permits are subject to a formal Stormwater Quality Assessment (SWQA) determination. The objective of the SWQA is to ensure that all new and redevelopment projects receive a consistent and thorough initial review, with the purpose of categorizing projects, determining applicable SWQMP requirements, and serving as a mechanism for recordkeeping of approved projects. The SWQA determination also demonstrates to the RWQCB that each project receives a consistent review and enables the City to document project categorization and satisfy the municipal separate storm sewer systems (MS4) Permit requirements. The SWQA is an integral part of the City BMP Design Manual.

Stormwater Facilities Maintenance Agreement

The City Standard Stormwater Facilities Maintenance Agreement with Access Rights and Covenants (SWFMA) is a recorded agreement for the maintenance and repair of stormwater management facilities (i.e. permanent post-construction BMPs), entered into between the owner and the City. The SWFMA is the final step to ensure ongoing stormwater management.

Best Management Practice Design Manual

To ensure that new and redevelopment complies with City ordinances and the San Diego Phase 1 Municipal Stormwater Permit, the City has developed a BMP Design Manual which addresses on-site post construction stormwater requirements for Standard Projects and Priority Development Projects. The BMP Design Manual provides guidance and procedures for planning, design, selection, and construction of permanent post-construction stormwater BMPs. Based on a site-specific analysis of a proposed new or redevelopment project, permanent post-construction structural/treatment control BMPs may be required to ensure that a project controls the discharge of pollutants in stormwater to the Maximum Extent Practicable and reduces the volume and flow rate of runoff due to increases in impervious surfaces.

The City's 2022 BMP Design Manual details measures that must be implemented on-site post-construction stormwater requirements for Standard Projects and Priority Development Projects, and provides updated procedures for planning, preliminary design, selection, and design of permanent stormwater BMPs based on the performance standards presented in the MS4 Permit. The BMP Design Manual includes performance standards for source control BMPs and site design BMPs, stormwater pollutant control BMPs, and hydromodification management BMPs based on the MS4 Permit. The City's BMP Design Manual includes a low impact development design guide for projects that includes incorporation of design features on site that would control runoff.

Best Management Practices for Development

All development and redevelopment projects are obligated to comply with federal, state, and local stormwater regulations during the planning, construction, and post-construction phases of development. Projects entering the construction phase of development are regulated under City grading and erosion control ordinances and the RWQCB's NPDES MS4 Permit that covers the San Diego Region (Order No. R9-2013-0001). The City is responsible for local administration and enforcement of stormwater management requirements throughout the development planning and construction stages for each project.

2020 Urban Water Management Plan

The City's 2020 Urban Water Management Plan (UWMP) provides an analysis of the current and anticipated water supply needs for the City until the horizon year of 2045 and contains a water supply

reliability assessment that identifies a diverse mix of imported and local supplies necessary to meet demands over the next 25 years on average, single-dry year, and multiple-dry year periods.

City of Oceanside General Plan Update

The City is in the process of comprehensively updating its General Plan through its 2024 General Plan Update (GPU). It is anticipated that the GPU Final Program Environmental Impact Report will be certified, and GPU adopted in 2025. This draft Program Environmental Impact Report was released for public review in June 2024 and is accessible on the City's website at <https://onwardoceanside.com/project-documents>. As the subject project of this Initial Study/Mitigated Negative Declaration is anticipated to be adopted by the end of 2024, the project was designed to be consistent with the adopted General Plan rather than the policies of the draft GPU.

9. SURROUNDING LAND USES & PROJECT SETTING:

The project site is bordered to the northwest, west, and east by a single-family, residential community which is zoned Single-Family Residential (RS). The project site is bordered to the north by City-owned property where a project application for a sewer lift station is being processed, and further north by a multi-family residential community, zoned Medium Density Residential B (RM-B). The project site is bordered immediately to the south by a multi-family residential community which is zoned Medium Density C (RM-C).

The topography of the project site is relatively flat, gently sloping down toward the south end, with larger slopes on the western edge. The project site sits within the Loma Alta community of the City. The project site is east of I-5, south of SR-76, west of El Camino Real, and north of Oceanside Boulevard.

The project area is currently occupied by a vacant school comprising 10 abandoned school structures, playground equipment and some miscellaneous maintenance materials. The property has been unused for four years since it closed in 2020.

10. OTHER REQUIRED AGENCY APPROVALS:

None

11. HAVE CALIFORNIA NATIVE AMERICAN TRIBES TRADITIONALLY & CULTURALLY AFFILIATED WITH THE PROJECT AREA REQUEST CONSULTATION PER 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, PROCEDURE REGARDING CONFIDENTIALITY, ETC.?

Pursuant to AB 52 and SB 18, the City as lead agency is required to conduct government-to-government consultation with Native American tribal groups. The City has conducted consultation with the San Luis Rey Band of Mission Indians, the Rincon Band of Luiseño Indians, and the Pala Band of Mission Indians. The San Luis Rey Band of Mission Indians requested for the City to impose its standard cultural resource mitigation measures. The Rincon Band of Luiseño Indians requested a few minor adjustments to the City's standard mitigation measures, including that invasive and non-invasive testing would be prohibited unless prior written approval is furnished by the affiliated tribes. The Pala Band of Mission Indians requested that the cultural resource report acknowledge the Cupeño history related to the area and retain a Cupeño monitor during ground disturbance activities.

12. CONSULTATION:

A. Federal, State, and Other Local Agencies Consulted: Native American Heritage Commission (NAHC)

B. Persons Consulted: None

13. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The project would not affect any environmental factors resulting in a Potentially Significant Impact or Potentially Significant Impact Unless Mitigated. A summary of the environmental factors potentially affected by this project, consisting of a Potentially Significant Impact or Potentially Significant Impact Unless Mitigated, include:

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology / Soils |
| <input type="checkbox"/> Greenhouse Gases | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality |
| <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input checked="" type="checkbox"/> Mandatory Finding of Significance | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Energy | | |

DETERMINATION. (To be completed by lead agency) Based on 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 the mitigation measures described herein have been included in this project. 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.

Dane Thompson
 Digitally signed by Dane Thompson
 DN: cn=Dane Thompson, ou=Building,
 email=DThompson@oceansideca.org
 Reason: I agree to the specified
 portions of this document
 Date: 2025.06.12 15:17:45 -0700
 Dane Thompson, Associate Planner City of Oceanside

14. 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.

	Potentially Significant	Potentially Significant Unless Mit.	Less than Significant	No Impact
14.1 AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic building along a State-designated scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public view are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicant zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.1 AESTHETICS

Analysis:

a. *Have a substantial adverse effect on a scenic vista?*

Less than Significant Impact. Within the City's western foothills, the visual resources include views out to the Pacific Ocean, as well as the San Luis Rey River and the open space habitat within Marine Corps Air Station Camp Pendleton to the north. Views from the project site include low hills, overhead utility towers, and surrounding residential homes (Photographs 1 through 3).

The project site is not within the City's designated Scenic Park Overlay District and does not include views of any scenic resources or to any other scenic vistas that may be of note in the project area, including but not limited to hills, open spaces, or creeks. Implementation of the project would rezone and redevelop the project site as shown on the Site Plan (see Figure 3) and while the project site composition would change, no changes to existing views of or from the project site would occur. The project would be developed consistent with the PDP which outlines the specific requirements and regulations applicable to the project site. Specifically, the PDP outlines land uses, development intensities, development regulations, as well as design guidelines that would provide a framework for the visual and aesthetic components of the structures, landscape, and all recreational amenities. Through the application of the site, architectural, and design guidelines, the City would be ensured that the project would not detrimentally affect project views. Therefore, the project would result in a less than significant impact on scenic vistas.



PHOTOGRAPH 1
Surrounding Views



PHOTOGRAPH 2
Adjacent Residential Uses



PHOTOGRAPH 3
Distant Views

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

Less than Significant Impact. The I-5 corridor is part of the California Scenic Highway System and is eligible for designation as an Official Scenic Highway (City of Oceanside 2021). As it passes through the City, I-5 provides visual access to the Pacific Ocean. The project site is not visible from I-5. The SR-76 corridor is also part of the California Scenic Highway System and is eligible for designation as an Official Scenic Highway (California Department of Transportation 2024). The project is a proposed residential development on an existing abandoned school site. It does not contain any scenic resources that could be visible from either highway. Therefore, the project would not result in the damage of a scenic resource visible from a designated scenic highway. Per General Plan LUE Section 1.23 policies, the project would be designed architecturally to improve the visual image of the surrounding neighborhood and would work in harmony with adjacent urban and or topographic landforms. Details related to the architecture and design materials are included in the project's PDP. Therefore, impacts related to damaging scenic resources within a state scenic highway would be less than significant.

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

Less than Significant Impact.

Construction: Construction of the project would result in incremental changes to the visual character of the project site and surrounding areas. Heavy equipment would be staged on-site, particularly during grading activities. Bulldozers, backhoes, cranes, and cement trucks would likely be used at various times throughout the construction phase. The presence of this equipment and the grading and construction activities associated with the project would alter the visual character and quality of the project site and would be visible from surrounding areas. Total construction would last approximately 23 months, and all equipment would subsequently be removed from the project site. While construction would last 23 months, visual effects associated with the visibility of construction equipment and personnel would be temporary. In addition, the visual change would be transitory as buildings are demolished, frames and other components would rise from the project site and progress daily. Over time, these features would begin to reflect the completed project including screening and landscaping that would allow the project to reflect the adjacent land uses and landforms.

Operation: The project site is located within the Loma Alta neighborhood, which is situated amidst sloping terrain between Mission Avenue to the north, Oceanside Boulevard to the south, El Camino Real to the east, and I-5 to the west. While Loma Alta is predominantly residential, with a mix of housing types (including single-family homes oriented around cul-de-sacs and curvilinear streets and multi-family apartment housing in self-contained complexes), other types of land uses extend along the boundaries of the neighborhood and create a range of edge conditions (City of Oceanside 2021). The project would result in a change in land use and zoning to allow a 140-unit residential development with on-site amenities. This would represent a change in the visual character of the project site from the existing use of a vacant school site to a residential development. Deviations from the base district regulations would allow for the creation of a high-quality residential community on an otherwise abandoned site that provides for pedestrian and vehicular connectivity to the existing neighborhoods. Modification of the front setback and wall height proposed by the PDP would have a minimal effect on neighboring properties due to the proximity of the proposed buildings to Garrison Street and the location of the retaining walls, which are all located interior to the project site and not visible from a public right-of-way.

The PDP would guide project architecture to ensure the project would be aesthetically connected throughout internally and would be architecturally and structurally consist with surrounding existing development. The proposed project represents a Contemporary style of architecture with coastal influences

that would complement the overall site surroundings. The integration of stucco, siding, and a neutral color palette complement the Contemporary and Mediterranean architectural styles of surrounding development. Buildings would have diverse elevations and would comprise two-, three-, and four-bedroom units with second- and third-floor balconies. This would ensure structural massing would be visually appealing. As an infill development, the project would also serve to activate the street frontage along Garrison Street by replacing an underutilized property.

The project would include walls and fencing which would serve to maintain the visual quality of the project site. As detailed in the PDP, all walls would be tan colored to reduce visuality and any fences visual from the exterior would be screened with landscaping or provide screening. The manufactured slopes that surround the project site to the west and northwest would be preserved with landscaping to maintain neighbor privacy and improve their appearance.

As detailed in the PDP, the project would also adhere to City ordinances including preparation and approval of a landscape plan, adherence to visual regulations relating to HVAC equipment, and lighting plan (CZO 3091, CZO 3021, and Code of Ordinances Chapter 39, respectively). Specifically, as described in the project description (and detailed in the PDP), the Landscape Plan would follow City guidelines related to plant types, irrigation, and water conservation. The project would replace 18 on-site trees in accordance with the City-approved tree list and several on-site trees would be preserved. Replacement trees would be chosen and planted in accordance with the City-approved tree list and selected from local, quality nursery stock, composed of 15-gallon and 24-inch boxed specimens, as detailed in the Tree Survey and Arborist Report (Appendix D). The replacement and preservation of the on-site trees would allow the project site to maintain its visual quality with respect to mature trees. Trees and landscaping proposed to be planted on the existing site slopes would further provide visual continuity with surrounding uses.

Through implementation of the development regulations and design guidelines included in the PDP, the project would be consistent with the surrounding residential character. In addition, the project would be designed consistent with the policies of General Plan LUE Section 1.2 Site Design, which would ensure the project to be designed to maximize the quality views and vistas from the project site to the surrounding environment and to maximize efficiency, safety, convenience, and open space. Therefore, the project would not result in the degradation of the existing visual character of the site and its surroundings. Impacts related to visual character and quality would be 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 Impact. Implementation of the project would introduce new sources of daytime light and glare and may change nighttime lighting and illumination levels. Lighting would be introduced in the form of interior and exterior light fixtures and vehicles entering and exiting the community, while glare could be a result of windows and glass on structures. However, the project would comply with the City's Code of Ordinances Chapter 39, which addresses citywide lighting standards, requiring that all lighting use is shielded luminaries with glare control to prevent light spillover onto adjacent areas. Windows and glass would be glazed appropriately per building standards to reduce the impact of glare on views in the area. Vehicle source lighting from headlights and taillights would be temporary, and in character with existing uses of the area. In addition, the project would be consistent with surrounding residential uses and would not introduce lighting that would be out of character for the area. In addition, the project would be consistent with General Plan LUE Section 1.12 Land Use Compatibility Policy C, which requires that the use of land would not subject people to potential sources of objectionable light, in addition to other objectionable nuisances. Therefore, the project's impact related to light and glare and adversely affecting day or nighttime views would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
<p>14.2 AGRICULTURE & FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. 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 project:</p>				
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance as depicted on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the CA. Resources Agency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

14.2 AGRICULTURE & FORESTRY RESOURCES

Analysis:

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

No Impact. Designated land uses within the project site do not include agricultural uses and project implementation would not result in conversion of existing farmland to non-agricultural uses. Therefore, the project does not affect an agricultural resource area and thus would have no impact on the conversion of designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

- b. *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. The proposed project is in an area zoned for residential uses; agricultural designations do not occur within the project site and no Williamson Act contracts apply. Therefore, implementation of the project

would not result in any conflicts with existing zoning for agricultural use or a Williamson Act Contract. No impacts are anticipated in this regard.

- 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))?*

No Impact. As noted in (b), the project site is in an area zoned for residential uses and no forestland timberland, or timberland zoned Timberland Protection areas occur within the project area or project site. Therefore, there would be no impacts related to conflict with forestland.

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

No Impact. See response to (c) above.

- 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 previously stated, the proposed project site is not located within an agricultural area. Thus, implementation of this project would not result in changes in the environment, which would result in the conversion of farmland to non-agricultural use. No impacts are anticipated in this regard.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.3 AIR QUALITY. Where available, the significant criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determination. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under the applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions, such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.3 AIR QUALITY

Analysis:

- a. *Conflict with or obstruct implementation of the applicable air quality plan?*

Less Than Significant Impact. Following the California Clean Air Act, California was divided geographically into 15 air basins for managing the state air resources on a regional basis. Areas within each air basin are considered to share the same air masses and therefore have similar ambient air quality. The project site is located within the San Diego Air Basin (SDAB). Stationary sources of air emissions within each air basin are regulated by regional air quality districts, of which the project is located within the jurisdiction of the SDAPCD.

Air districts are tasked with regulating emissions such that air quality in the basin does not exceed national or California ambient air quality standards (NAAQS and CAAQS, respectively); where NAAQS and CAAQS represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. NAAQS and CAAQS have been established for six common pollutants of concern known as criteria pollutants, which include ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), lead (Pb), and respirable particulate matter (particulate matter less than 10 microns [PM₁₀] and less than 2.5 microns [PM_{2.5}]).

The SDAB is currently classified as a federal and state non-attainment area for ozone, and as a state non-attainment area for PM₁₀, and PM_{2.5}. The SDAPCD prepared an air quality plan, the RAQS, to identify feasible emission control measures intended to progress toward attaining NAAQS and CAAQS for ozone. Reducing ozone concentrations is achieved by reducing the precursors to the photochemical formation of ozone (volatile organic compounds [VOC] and oxides of nitrogen [NO_x]). The RAQS was most recently updated in 2022.

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by SANDAG in the development of the 2021 Regional Plan which combines the Regional Transportation Plan (RTP), the Sustainable Communities Strategy (SCS), and the Regional Comprehensive Plan. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's and/or the General Plan would not conflict with the RAQS. If a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

The project site is currently designated as Civic Institutional (CI) and Medium Density C Residential (MDC-R) in the General Plan and is zoned Public Semipublic (PS) and Medium Density C (RM-C). The project proposes a General Plan Amendment to redesignate the project site to Medium Density Residential (MDC-R) and would rezone the project site as Planned Development (PD). When the site operated as an elementary school, enrollment between the year 1981 and its closure in 2020 ranged from 415 to 915 students (California Department of Education 2023). Assuming an Institute of Transportation Engineers (ITE) trip rate of 1.89 trips per student (California Air Pollution Control Officers Association [CAPCOA] 2022), the elementary school generated 785 to 1,730 daily weekday trips. The project would generate 973 daily weekday trips (Appendix E). Thus, the trips that would be generated by the project would be within the range of trips that were generated by the elementary school use allowable under the Civic Institutional (CI) land use designation. Since overall emissions are largely due to mobile sources, emissions generated by the project would be within the range of emissions generated by the elementary school, and the project would not result in an increase in emissions beyond those that are accounted for in the RAQS. Additionally, as discussed in Section 14.3(b) below, project emissions would not exceed the project-level significance thresholds. Therefore, the project would not result in an increase in emissions that are not already accounted for in the RAQS, and impacts would be 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 Impact. The SDAPCD does not provide quantitative thresholds for determining the significance of construction or mobile source-related impacts. However, the SDAPCD does specify Air Quality Impact Analysis trigger levels for new or modified stationary sources (SDAPCD Rules 20.1, 20.2, and 20.3). These trigger level thresholds align with attainment of the NAAQS and be protective of public health. Thus, air quality emissions below these levels would meet the NAAQS. The NAAQS were developed to protect public health, specifically the health of "sensitive" populations, including asthmatics, children, and the elderly. The air quality impact screening levels used in this analysis are shown in Table 4.

Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
NO _x	25	250	40
SO _x	25	250	40
CO	100	550	100
PM ₁₀	--	100	15
Lead	--	3.2	0.6
VOC, ROG ¹	--	250	--
PM _{2.5}	--	67	10

NO_x = oxides of nitrogen; SO_x = oxides of sulfur; CO = carbon monoxide; PM₁₀ = particulate matter less than 10 microns; VOC = volatile organic compounds; ROG = reactive organic gases; PM_{2.5} = particulate matter less than 2.5 microns
 SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3.
¹ROG threshold based on federal General Conformity *de minimis* levels for ozone precursors.

The project would result in short-term emissions from construction and long-term emissions associated with project operation. Construction and operational emissions associated with the project were modeled using CalEEMod version 2022.1 (Appendix F), which incorporates current air emission data. Planning methods, protocol, modeling methodology, and assumptions are summarized below.

Construction Emissions

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include the following:

- Fugitive dust from demolition and grading activities;
- Construction equipment exhaust;
- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

Construction-related pollutants result from dust raised during demolition and grading, emissions from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55 of the SDAPCD's rules and regulations. Compliance with these regulations is consistent with the objectives of the General Plan ERM Element for development projects to ensure the protection of air quality.

Heavy-duty construction equipment is usually diesel powered. In general, emissions from diesel-powered equipment contain more NO_x, SO_x, and particulate matter than gasoline-powered engines. However, diesel-powered engines generally produce less CO and less ROG than do gasoline-powered engines. Standard construction equipment includes tractors/loaders/backhoes, rubber-tired dozers, excavators, graders, cranes, forklifts, rollers, paving equipment, generator sets, welders, cement and mortar mixers, and air compressors.

Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Specific construction phasing and equipment parameters are not available at this time. However, CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The estimates are based on surveys (performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District) of typical construction projects, which provide a basis for scaling equipment needs and schedule with a project's size. Air emission

estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. Construction is anticipated to begin in 2027 and last for approximately 16 months. Construction emissions were calculated using CalEEMod default phasing and equipment for the given land use, project site size, and building size. Grading of the project site would require the raw cut and raw fill of 81,873 cubic yards of soil. As a conservative analysis that accounts for any possible soil transport, an export quantity of 81,873 cubic yards was modeled.

Table 5 shows the total projected construction maximum daily emission levels for each criteria pollutant. The CalEEMod output files for construction emissions for the project are contained in Appendix F.

Table 5						
Summary of Maximum Build-out Construction Emissions						
(pounds per day)						
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition	2	23	20	<1	5	1
Site Preparation	3	28	29	<1	9	5
Grading	2	60	35	<1	14	5
Building Construction	1	10	17	<1	1	1
Paving	1	7	10	<1	<1	<1
Architectural Coatings	42	1	2	<1	<1	<1
Maximum Daily Emissions	42	60	35	<1	14	5
<i>Significance Threshold</i>	<i>250</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
SOURCE: Appendix F, CalEEMod Outputs						

Standard dust control measures would be implemented as a part of project construction in accordance with mandatory SDAPCD rules and regulations. Fugitive dust emissions were calculated using CalEEMod default values with implementation of SDAPCD dust control measures.

To assess the significance of the air quality emissions resulting from construction of the project, construction emissions were compared to the significance thresholds. As shown, maximum daily construction emissions associated with the project are projected to be less than the applicable thresholds for all criteria pollutants. These thresholds are designed to provide limits below which project emissions would not significantly change regional air quality. In addition, the project applicant would implement standard construction measures to comply with mandatory SDAPCD rules and regulations (Rules 50, 51, 52, 54, and 55) for controlling emissions from fugitive dust and fumes, as detailed above and summarized here:

- Water the grading areas a minimum of twice daily to minimize fugitive dust.
- Provide sufficient erosion control to prevent washout of silty material onto public roads.
- Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling.
- Periodically sweep up dirt and debris spilled onto paved surfaces to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites of construction-related dirt.

Further, all construction equipment is subject to the CARB In-Use Off-Road Diesel-Fueled Fleets Regulation. This regulation, which applies to all off-road diesel vehicles 25 horsepower or greater, limits unnecessary idling to five minutes, requires all construction fleets to be labeled and report to CARB, bans Tier 0 equipment and phases out Tier 1 and 2 equipment (thereby replacing fleets with cleaner equipment), and requires that fleets comply with Best Available Control Technology requirements.

Therefore, as project construction emissions would be below these limits and the project would implement standard construction measures as required by SDAPCD rules and regulations and CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation, construction emissions would not result in regional emissions that would exceed the NAAQS or CAAQS or contribute to existing violations. Therefore, construction of the

project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, and impacts would be less than significant.

Operational Emissions

Operation of the project would result in long-term emissions from mobile, energy, and area sources. Mobile emissions were calculated using ITE 11th Edition trip generation rate of 6.95 weekday trips per dwelling unit for a total of 973 daily trips (see Appendix E). Weekend trip rates were calculated by proportionately adjusting the CalEEMod default trip rates. CalEEMod default trip lengths and vehicle emission factors for the soonest operational year of 2028 were modeled.

Area sources include emissions from the use of landscaping equipment, consumer products (aerosols, cleansers, etc.), and architectural coatings (e.g., building and parking lot paint). These area sources were calculated based on default CalEEMod regional use factors. Energy sources of emissions from a project include the combination of natural gas used for water heating; however, the project would be all electric (i.e., no natural gas appliances) and would not include any energy sources of emissions.

Table 6 provides a summary of the total operational emissions generated by the project. Air quality modeling output files via CalEEMod for operation of the project are contained in Appendix F

Emission Source	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile	3	2	20	<1	5	1
Area	4	<1	8	<1	<1	<1
Energy	0	0	0	0	0	0
Total	7	2	28	<1	5	1
<i>Significance Threshold</i>	250	250	550	250	100	67
SOURCE: Appendix F, CalEEMod Outputs						
NOTE: Totals may vary due to independent rounding.						

As shown in Table 6, operation of the project would not generate regional emissions that would exceed the NAAQS or CAAQS or contribute to existing violations. Therefore, operation of the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, and impacts would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A sensitive receptor is a person in the population who is more susceptible to health effects due to exposure to an air contaminant than is the population at large. Examples of sensitive receptor locations in the community include residences, schools, playgrounds, childcare centers, churches, athletic facilities, retirement homes, and long-term health care facilities. The project site is surrounded by residential uses. The two primary emissions of concern regarding health effects are diesel particulate matter (DPM) and CO.

Construction DPM

Construction of the project would result in the generation of diesel exhaust DPM emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from the project site. Not all construction worker vehicles would be diesel-fueled and most DPM emissions associated with material delivery trucks and construction worker vehicles would occur off-site.

Generation of DPM from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were a year, the exposure would be three percent of the total exposure period used for health risk calculation.

For purposes of analyzing construction-related toxic air contaminant emissions and their impact on sensitive receptors, the maximum annual PM₁₀ emissions from equipment exhaust were used to develop an average daily emission rate. The exhaust emissions were calculated by CalEEMod, and the maximum annual DPM concentration was calculated using AERSCREEN. AERSCREEN calculates a worst-case maximum 1-hour concentration at a specific distance and specific angle from the source. The maximum 1-hour concentration is then converted to an annual concentration using a 0.08 conversion factor (U.S. Environmental Protection Agency [U.S. EPA] 1992).

Once the dispersed concentrations of diesel particulates are estimated in the surrounding air, they are used to evaluate estimated exposure to people. Exposure is evaluated by calculating the dose in milligrams per kilogram body weight per day (mg/kg/d). For residential exposure, the breathing rates are determined for specific age groups, so inhalation dose (Dose-air) is calculated for each of these age groups: third trimester of pregnancy, 0<2, 2<9, 2<16, 16<30 and 16–70 years. The equation for dose through inhalation (Dose-air) is as follows:

$$\text{Dose-air} = (C_{\text{air}} \times \text{DBR} \times A \times \text{EF} \times 10^{-6});$$

Where:

Dose-air	=	Chronic daily intake, mg/kg/d
C _{air}	=	Ground-level concentration of toxic air contaminants to which the receptor is exposed, micrograms/cubic meter
DBR	=	Daily breathing rate, normalized to body weight (liters per kilogram body weight per day (OEHHA 2015))
A	=	Inhalation absorption factor (OEHHA recommended factor of 1)
EF	=	Exposure frequency, days/year (OEHHA recommended factor of 0.96 for resident and 0.68 for workers)

Cancer risk is calculated by multiplying the daily inhalation or oral dose, by a cancer potency factor, the age sensitivity factor, the frequency of time spent at home and the exposure duration divided by averaging time, to yield the excess cancer risk. The excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk for any given location. The worst-case cancer risk is calculated as follows:

$$\text{Excess Cancer Risk} = \text{Dose-air} \times \text{CPF} \times \text{ASF} \times \text{ED/AT} \times \text{FAH};$$

Where:

Dose-air	=	Chronic daily intake, mg/kg body weight per day
CPF	=	Cancer potency factor (mg/kg/d)
ASF	=	Age sensitivity factor
ED	=	Exposure duration (years)
AT	=	Averaging time for lifetime cancer risk (years)
FAH	=	Fraction of time at home

Non-cancer risks are defined as chronic or acute. With respect to DPM only chronic risks are calculated and are determined by the hazard index. To calculate hazard index, DPM concentration is divided by its chronic Reference Exposure Levels. Where the total equals or exceeds one, a health hazard is presumed to exist.

In this analysis, non-carcinogenic impacts are evaluated for chronic exposure inhalation exposure. Estimates of health impacts from non-carcinogenic concentrations are expressed as a hazard quotient (HQ) for individual substances, such as diesel particulate. An HQ of one or less indicates that adverse health effects are not expected to result from exposure to emissions of that substance. Reference Exposure Levels are defined as the concentration at which no adverse health effects are anticipated. Generally, the inhalation pathway is the largest contributor to the total dose. The HQ is calculated with the following equation:

$$HQ = \text{Ground-Level Concentration } (\mu\text{g}/\text{m}^3) / \text{Reference Exposure Level } (\mu\text{g}/\text{m}^3)$$

It should also be noted that all construction equipment is subject to the CARB In-Use Off-Road Diesel-Fueled Fleets Regulation. This regulation, which applies to all off-road diesel vehicles 25 horsepower or greater, limits unnecessary idling to five minutes, requires all construction fleets to be labeled and reported to CARB, bans Tier 0 equipment and phases out Tier 1 and 2 equipment (thereby replacing fleets with cleaner equipment), and requires that fleets comply with Best Available Control Technology requirements.

Based on the CalEEMod calculations for project construction, the project would result in on-site maximum annual emissions of 0.0549 tons of PM₁₀ exhaust (Note that total combined on-site and off-site maximum annual emissions would be 0.0626 tons of PM₁₀ exhaust, however, only on-site emissions are included in the analysis because off-site emissions would occur at other locations further from the surrounding sensitive receptors). This maximum annual emissions rate was modeled over the entire 16-month construction period and therefore is a conservative assessment. Based on AERSCREEN modeling results, the maximum 1-hour ground-level DPM concentration from construction activities would be 0.0342 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). This was converted to an annual average concentration of 0.00274 $\mu\text{g}/\text{m}^3$ using a conversion factor of 0.08 (U.S. EPA 1992). The resulting annual concentration was used in the equations discussed above. Using this methodology, it was calculated that the excess cancer risk would be 0.64 in a million. AERSCREEN and cancer risk calculations are provided in Appendix F. DPM generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer. Additionally, the HQ would be 0.0005, which is less than one. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with diesel particulate matter during construction that could result in excess cancer risks, and impacts would be less than significant.

Carbon Monoxide Hotspots

Localized CO concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. Under specific meteorological conditions, CO concentrations may reach unhealthy levels with respect to local sensitive land uses. Projects that would site sensitive receptors near potential CO hotspots or would contribute vehicle traffic to local intersections where a CO hotspot could occur would be considered as having a potentially significant impact.

The SDAB is a CO maintenance area under the federal Clean Air Act. This means that SDAB was previously a nonattainment area and is currently implementing a 10-year plan for continuing to meet and maintain air quality standards. According to the California Department of Transportation's Project-Level Carbon Monoxide Protocol (CO Protocol), in maintenance areas, only projects that are likely to worsen air quality necessitate further analysis. The CO Protocol indicates projects may worsen air quality if they worsen traffic flow, defined as increasing average delay at signalized intersections operating at LOS E or F or causing an intersection that would operate at LOS D or better without the project to operate at LOS E or F. Accordingly, the CO Protocol recommends detailed air quality dispersion modeling for projects that may worsen traffic flow at any signalized intersections operating at LOS E or F.

Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, more recent screening procedures based on more current methodologies have been developed. The Bay Area Air Quality Management District (BAAQMD) developed a screening threshold in their 2022 CEQA Guidelines (BAAQMD 2022). If all the following screening criteria are met, operation of a project would result in a less than significant impact related to CO (BAAQMD 2022):

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, the RTP, and local congestion management agency plans.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).
- The Bay Area and San Diego have the same federal and state CO attainment designations, and therefore experience similar CO concentrations; thus, these screening volumes are appropriate for evaluating CO impacts in the SDAB. As discussed above, the project would be consistent with SANDAG's 2021 Regional Plan. Based on the traffic analysis, peak hour turning volumes at study area intersections would be well less than 44,000 vehicles per hour (see Appendix E). Therefore, based on BAAQMD screening criteria, the project would not result in CO hotspots.

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

Less Than Significant Impact. A potential odor impact can occur from the following two different situations: (1) the project would introduce receptors (people) in a location where they would be affected by an existing or future planned odor source, or (2) future land uses would generate odors that could adversely affect a substantial number of persons.

Emissions from construction equipment, such as diesel exhaust, and VOCs from architectural coatings and paving activities may generate odors. However, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Therefore, construction would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

The type of facilities that are considered to generate objectionable odors during operation include wastewater treatment plants, landfills, and paint/coating operations (e.g., auto body shops), among others. The project proposes residential use that would not be an operational source of odors. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.4 BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the USFWS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game (DFG) or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy/ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.4 BIOLOGICAL RESOURCES

Analysis:

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

Less than Significant Impact with Mitigation Incorporated. As part of the Biological Technical Report prepared for the project (see Appendix F), special-status species with the potential to occur within one mile of the survey area per the California Natural Diversity Database and SanBIOS occurrence records, or which were identified in the Information for Planning and Consultation database (IPaC), are listed in Table 7. The survey area is defined as the project site, off-site areas where work is proposed (including the secondary/emergency access road), and a 300-foot buffer of the furthest extent of these combined areas. As shown in Table 7, most special-status species have a low potential to occur except three listed species have a moderate potential to occur (highlighted in yellow). It is noted that there were no previous records of special-status species directly within the survey area itself. The nearest record was for thread-leaved brodiaea, identified as a federally threatened, state endangered, and a California rare, threatened, or endangered species with low potential to occur, located approximately 120 feet northeast of the survey area. During the field survey, a pair of willow flycatchers were observed near the school building in an ornamental ash tree. The willow flycatchers could not be identified to subspecies and therefore may either have been migrants of the special-status southwestern subspecies or of the little willow flycatcher subspecies which is not special-status and breeds outside of the region. However, no nesting behavior was

observed and no riparian forest nesting habitat for this species occurs in the survey area; therefore, this was considered a transient or migrant observation.

Table 7 Special Status Species Reviewed for the Potential to Occur			
Scientific Name	Common Name	Special Status	Potential to Occur
PLANTS			
<i>Acanthomintha ilicifolia</i>	San Diego thornmint	FT	Does not occur
<i>Acmispon prostratus</i>	Nuttall's acmispon	1B.1	Low
<i>Adolphia californica</i>	California adolphia	2B.1	Low
<i>Ambrosia pumila</i>	San Diego ambrosia	FE, 1B.1	Low
<i>Aphanisma blitoides</i>	aphanisma	1B.2	Low
<i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i>	Del Mar Manzanita	FE	Does not occur
<i>Atriplex coulteri</i>	Coulter's saltbush	1B.2	Low
<i>Atriplex pacifica</i>	south coast saltscale	1B.2	Low
<i>Brodiaea filifolia</i>	thread-leaved brodiaea	FT, SE, 1B.1	Low
<i>Centromadia pungens</i> ssp. <i>laevis</i>	smooth tarplant	1B.1	Low
<i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i>	Orcutt's pincushion	1B.1	Does not occur
<i>Cryptantha wigginsii</i>	Wiggins' cryptantha	1B.2	Low
<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	Blochman's dudleya	1B.1	Low
<i>Dudleya variegata</i>	variegated dudleya	1B.2	Low
<i>Dudleya viscida</i>	sticky dudleya	1B.2	Low
<i>Eryngium aristulatum</i> var. <i>parishii</i>	San Diego button-celery	FE, SE, 1B.1	Does not occur
<i>Erysimum ammophilum</i>	sand-loving wallflower	1B.2	Low
<i>Euphorbia misera</i>	cliff spurge	2B.2	Low
<i>Ferocactus viridescens</i>	San Diego barrel cactus	2B.1	Low
<i>Isocoma menziesii</i> var. <i>decumbens</i>	decumbent goldenbush	1B.2	Low
<i>Iva hayesiana</i>	San Diego marsh-elder	2B.2	Low
<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's pepper-grass	4.3	Moderate
<i>Leptosyne maritima</i>	sea dahlia	2B.2	Low
<i>Nama stenocarpa</i>	mud nama	2B.2	Does not occur
<i>Navarretia fossalis</i>	spreading navarretia	FT, 1B.1	Does not occur
<i>Nemacaulis denudata</i> var. <i>denudata</i>	coast woolly-heads	1B.2	Does not occur
<i>Nemacaulis denudata</i> var. <i>gracilis</i>	slender cottonheads	2B.2	Does not occur
<i>Quercus dumosa</i>	Nuttall's scrub oak	1B.1	Low
<i>Sidalcea neomexicana</i>	salt spring checkerbloom	2B.2	Does not occur
<i>Sphenopholis interrupta</i> ssp. <i>californica</i>	prairie false oat	1B.1	Low
INVERTEBRATES			
<i>Bombus crotchii</i>	Crotch's bumble bee	SC	Low
<i>Branchinecta lynchi</i>	Vernal Pool Fairy Shrimp	FT	Does not occur
<i>Branchinecta sandiegonensis</i>	San Diego fairy shrimp	FE	Does not occur
<i>Cicindela latesignata</i>	western beach tiger beetle	SA	Does not occur
<i>Danaus plexippus plexippus</i> pop. 1	monarch - California overwintering population	FC	Low (overwintering roosts)
<i>Streptocephalus woottoni</i>	Riverside Fairy Shrimp	FE	Does not occur
<i>Tryonia imitator</i>	mimic tryonia (=California brackishwater snail)	SA	Does not occur
FISH			
<i>Eucyclogobius newberryi</i>	tidewater goby	FE, SSC	Does not occur
AMPHIBIANS AND REPTILES			
<i>Actinemys pallida</i>	southwestern pond turtle	PT, SSC	Does not occur
<i>Anaxyrus californicus</i>	arroyo toad	FE	Does not occur

Table 7 Special Status Species Reviewed for the Potential to Occur			
Scientific Name	Common Name	Special Status	Potential to Occur
<i>Anniella stebbinsi</i>	Southern California legless lizard	SSC	Low
<i>Arizona elegans occidentalis</i>	California glossy snake	SSC	Low
<i>Crotalus ruber</i>	red-diamond rattlesnake	SSC	Moderate
<i>Spea hammondi</i>	western spadefoot	PT, FP, SSC	Does not occur
<i>Thamnophis sirtalis pop. 1</i>	south coast gartersnake	SSC	Moderate (300-foot buffer only)
BIRDS			
<i>Agelaius tricolor</i>	tricolored blackbird	ST, SSC, BCC	Does not occur (nesting)
<i>Aimophila ruficeps canescens</i>	southern California rufous-crowned sparrow	WL	Low
<i>Buteo swainsoni</i>	Swainson's hawk	ST	Does not occur (nesting)
<i>Campylorhynchus brunneicapillus sandiegensis</i>	coastal cactus wren	SSC, BCC	Does not occur (nesting)
<i>Charadrius nivosus nivosus</i>	western snowy plover	FTSSC	Does not occur (nesting/breeding/foraging)
<i>Circus hudsonius</i>	northern harrier	SSC, BCC	Does not occur (nesting)
<i>Elanus leucurus</i>	white-tailed kite	FP	Does not occur (nesting)
<i>Empidonax traillii extimus</i>	southwestern willow flycatcher	FE, SE	Does not occur (breeding/nesting)
<i>Icteria virens</i>	yellow-breasted chat	SSC	Does not occur (nesting)
<i>Passerculus sandwichensis beldingi</i>	Belding's savannah sparrow	SE, BCC	Does not occur (nesting/foraging)
<i>Plegadis chihi</i>	white-faced ibis	WL	Does not occur (nesting)
<i>Polioptila californica californica</i>	coastal California gnatcatcher	FT, SSC	Low
<i>Rallus obsoletus levipes</i>	light-footed Ridgway's rail	FE, SE, FP	Does not occur (nesting/breeding/foraging)
<i>Riparia riparia</i>	bank swallow	ST	Does not occur (nesting)
<i>Setophaga petechia</i>	yellow warbler	SSC	Does not occur (nesting)
<i>Sternula antillarum browni</i>	California least tern	FE, SE, FP	Does not occur (nesting/breeding/foraging)
<i>Vireo bellii pusillus</i>	least Bell's vireo	FE, SE	Does not occur (nesting)
MAMMALS			
<i>Antrozous pallidus</i>	pallid bat	SSC	Does not occur (roosting)
<i>Chaetodipus fallax fallax</i>	northwestern San Diego pocket mouse	SA	Low
<i>Dipodomys stephensi</i>	Stephens' kangaroo rat	FT, ST	Low
<i>Lasiurus xanthinus</i>	western yellow bat	SSC	Does not occur (roosting)
<i>Leptonycteris yerbabuenae</i>	lesser long-nosed bat	FD, SSC	Does not occur (roosting)
<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	SA	Low
<i>Nyctinomops femorosaccus</i>	pocketed free-tailed bat	SSC	Does not occur (roosting)
<i>Perognathus longimembris pacificus</i>	Pacific pocket mouse	FE	Low
SOURCES: CDFW 2024, SANDAG 2024, USFWS 2024			

Table 7
Special Status Species Reviewed for the Potential to Occur

Status Key:

FE = Federal Endangered
 FD = Federally Delisted
 FT = Federal Threatened
 PT = Federal Proposed Threatened
 FC = Candidate for federal listing
 SE = California Endangered
 ST = State Threatened
 SC = Candidate for state listing
 FP = California fully protected
 SSC = California Special Concern Species
 SA = Other California Natural Diversity Database-designated Special Animal
 BCC = Birds of Conservation Concern
 WL = Watch List

California Rare Plant Ranks (CRPR):

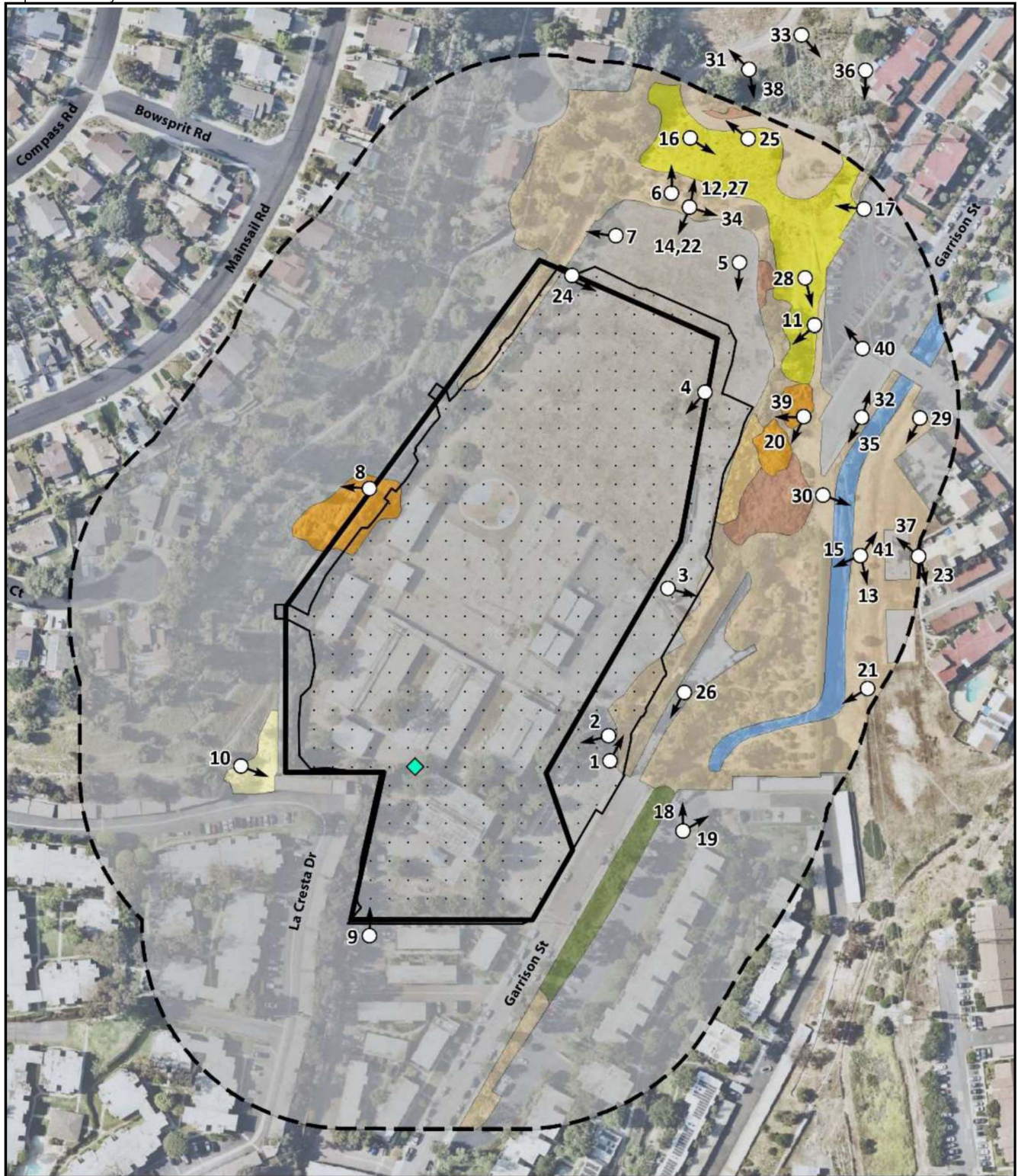
1B = Rare, Threatened or Endangered in California and elsewhere
 2B = Rare, Threatened or Endangered in California, but more common elsewhere
 4 = Watch List, Plants of limited distribution
 .1 = seriously threatened in California
 .2 = moderately threatened in California
 .3 = Not very threatened in California

A biological reconnaissance survey was completed to verify this data review, evaluate potential habitat suitability for special-status species, document incidental observations of special-status species, and to investigate habitat suitability for riparian birds within a drainage east of the project site. Per the field survey completed of the survey area, most areas of the project site were heavily disturbed due to mowing and maintenance of the former use of the project site. The project site currently consists of abandoned school buildings, a mowed field, ornamental vegetation, and small patches of natural vegetation. The most intact habitat consisted of Diegan coastal sage scrub on the eastern side of the project site which was still influenced by non-natives such as Mexican fan palm, shortpod mustard, annual grasses, and Mediterranean stork's bill. Diegan coastal sage scrub dominated by California sagebrush, coyote brush, and California buckwheat is not listed as a California Sensitive Natural Community by CDFW, and native grassland dominated by cane bluestem is not included on the California Natural Community List.

To assess potential impacts on any species identified as a candidate, sensitive, or special status, the Biological Technical Report (Appendix G) identified permanent impacts as the furthest extent of both the project boundary and project impact areas (Figure 8). Temporary impacts for materials storage or construction staging would take place entirely within the permanent impact area boundary and therefore are not discussed further.

Plants

Per the Biological Technical Resources Report (see Appendix G), 0.113 acres of disturbed Diegan coastal sage scrub and 0.001 acres of Diegan coastal sage scrub are within the grading boundary and would be impacted by removal, grading, or other project activities (see Figure 8). The Diegan coastal sage scrub community is fragmented and disturbed within the project site but has the potential to support rare plant species, such as Robinson's pepper-grass. Therefore, potentially significant direct impacts to a species identified as a candidate, sensitive, or special status species would occur as a result of the removal of on-site vegetation. Per the Oceanside Subarea Habitat Conservation Plan/Natural Communities Conservation Plan (City of Oceanside 2010), Diegan coastal sage scrub is identified as a priority for conservation and the recommended mitigation ratio is 3:1. As such, mitigation measure **BIO-1** recommends that 0.342 acres of coastal sage scrub be conserved through conservation of open space on-site or through purchase of off-site mitigation credit at a City-approved mitigation bank and/or restoration of habitat. Implementation of this measure would reduce impacts to Diegan coastal sage scrub to less than significant.



- | | | |
|---|---|---|
| <ul style="list-style-type: none"> Project Boundary Project Impacts Survey Area Photo Location Other Observations Willow Flycatcher (<i>Empidonax traillii</i>) | <p>Vegetation</p> <ul style="list-style-type: none"> Disturbed Wetland Baccharis Scrub Diegan Coastal Sage Scrub Diegan Coastal Sage Scrub - Disturbed | <ul style="list-style-type: none"> Native Grassland Non-native Grassland Eucalyptus Disturbed Habitat Urban/Developed |
|---|---|---|

FIGURE 8
Biological Resource Impacts

Additionally, potentially significant indirect impacts could occur to off-site sensitive plant species as a result of construction activities. Mitigation measure **BIO-2** recommends the implementation of general construction measures to avoid and minimize impacts to biological resources based on guidance within the SAP. Implementation of mitigation measure **BIO-2** would reduce impacts to off-site native or natural habitats and therefore potential special status species to less than significant.

Mitigation measure **BIO-3** recommends the completion of a rare plant survey to reduce potential impacts to special-status plant species. Per the mitigation measure **BIO-3**, if threatened or endangered plants, such as thread-leaved brodiaea, are detected during the survey, the project proponent or representative shall consult with the applicable wildlife agencies to determine appropriate mitigation.

Wildlife

The Diegan coastal sage scrub community is fragmented and disturbed within the project site but has the potential to support transient/dispersing coastal California gnatcatcher. However, as detailed above, no nesting behavior was observed and no riparian forest nesting habitat for this species occurs in the survey area; therefore, impacts to coastal California gnatcatcher is considered less than significant. The only special-status wildlife species with a moderate potential to occur within the impact area is the red-diamond rattlesnake. Impacts from the project could include displacement, habitat loss, and direct mortality resulting from site development and grading. However, impacts are expected to be less than significant based on the limited extent of habitat within the impact area. In addition, in off-site areas, the south coast gartersnake has a moderate potential to occur within the drainage located approximately 120 feet east of the project site; however, no impacts to this species or other special status wildlife species are anticipated.

In addition, due to the potential for occurrence of rare plant species (see Table 7) and proximity of a known occurrence and critical habitat for thread-leaved brodiaea, the project has the potential to impact rare plants through direct destruction during clearing and grading. As noted above, the nearest record for thread-leaved brodiaea, identified as a federally threatened, state endangered, and a California rare, threatened, or endangered species with low potential to occur, is located approximately 120 feet northeast of the Survey Area. Within the Survey Area, Robinson's pepper-grass was the only species determined to have a moderate potential to occur within the project impact area.

Impacts to rare plants may be significant depending on the degree of impacts to these species. To mitigate the potential for impacts to special-status plants, mitigation measure **BIO-3** is proposed. Mitigation measure **BIO-3** recommends a rare plant survey prior to construction during the appropriate seasons within portions of the project site/grading area determined to have the potential to support rare plants. If rare plants are detected during the survey, they should be avoided to the maximum extent feasible. If threatened or endangered plants, such as thread-leaved brodiaea, are detected during the survey, the project proponent or representative shall consult with the applicable wildlife agencies to determine appropriate mitigation. This would reduce potential impacts to species identified as a candidate, sensitive, or special status species to less than significant.

In addition, due to the presence of native or natural habitats in the project area vicinity, the project has the potential to result in off-site habitat impacts from construction activities such as fugitive dust settling on sensitive habitats near the project. This would result in a significant impact without mitigation implemented.

Mitigation Measures

BIO-1: Coastal Sage Scrub Mitigation

Prior to construction, the permanent loss of approximately 0.114 acres of disturbed coastal sage scrub within the Wildlife Corridor Planning Zone (WCPZ) and south of SR-76 shall be mitigated at a ratio of 3:1 for a total of 0.342 acres of replacement habitat. The habitat mitigation will be provided either by conservation, restoration, and/or enhancement of coastal sage scrub habitat within the WCPZ and south

of SR-76, if possible. If not possible, habitat mitigation will be provided within the WCPZ as the second priority, and within the City of Oceanside as the third priority. Conservation, restoration or enhancement of coastal sage scrub habitat will be provided either on-site, if feasible, or off-site at a City-approved mitigation bank and/or as directed by the City.

BIO-2: General Construction Measures for Biological Resources

1. The project applicant shall temporarily fence (with silt barriers) the limits of project impacts (including construction staging areas and access routes) to prevent additional habitat impacts and prevent the spread of silt from the construction zone into adjacent native habitats to be preserved. Fencing shall be installed in a manner that does not impact habitats to be preserved. If work occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of the Wildlife Agencies. Any riparian/wetland or upland habitat impacts that occur beyond the approved fenced area shall be mitigated at a minimum 5:1 ratio. Temporary construction fencing shall be removed upon project completion.
2. Impacts from fugitive dust will be avoided and minimized through watering and other appropriate measures.
3. The Applicant shall ensure that the following conditions are implemented during project construction:
 - a. Employees shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint;
 - b. To avoid attracting predators of covered species, the project site shall be kept as clean of debris as possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from the project site;
 - c. Pets of project personnel shall not be allowed on the project site;
 - d. Disposal or temporary placement of excess fill, brush or other debris shall not be allowed in waters of the United States or their banks;
 - e. All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities shall occur in designated areas outside of waters of the United States within the fenced project impact limits. These designated areas shall be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering waters of the United States and shall be shown on the construction plans.
4. Fueling of equipment shall take place within existing paved areas greater than 100 feet from waters of the United States. Contractor equipment shall be checked for leaks prior to operation and repaired as necessary. "No-fueling zones" shall be designated on construction plans.
5. If night work is necessary, night lighting shall be of the lowest illumination necessary for human safety, selectively placed, shielded, and directed away from natural habitats.
6. The applicant shall ensure that development landscaping adjacent to on- or off-site habitat does not include exotic plant species that may be invasive to native habitats. Exotic plant species not to be used include any species listed on the California Invasive Plant Council's "Invasive Plant Inventory" List. This list includes such species as pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. A copy of the complete list can be obtained from the California Invasive Plant Council's website or other similar sources that may evolve over the life of this plan. In addition,

landscaping should not use plants that require intensive irrigation, fertilizers, or pesticides adjacent to the Preserve and water runoff from landscaped areas should be directed away from the biological conservation easement area and contained and/or treated within the development footprint. The applicant shall ensure that development lighting adjacent to all on- or off-site habitat shall be directed away from and/or shielded so as not to illuminate native habitats. Any planting stock to be brought onto the project site for landscape or habitat creation/restoration/enhancement shall be first inspected by a qualified pest inspector to ensure it is free of pest species that could invade natural areas, including but not limited to, Argentine ants, fire ants, and other insect pests. Any planting stock found to be infested with such pests shall not be allowed on the project site or within 300 feet of natural habitats unless documentation is provided to the Agencies that these pests already occur in natural areas around the project site. The stock shall be quarantined, treated, or disposed of according to best management principles by qualified experts in a manner that precludes invasions into natural habitats. The applicant shall ensure that all temporary irrigation will be for the shortest duration possible, and that no permanent irrigation will be used, for landscape or habitat creation/restoration/enhancement.

BIO-3: Rare Plant Survey

Prior to construction, a qualified biologist shall determine rare plant species with potential to occur and conduct a rare plant survey during the appropriate seasons within portions of the project site/grading area determined to have the potential to support rare plants. If rare plants are detected during the survey, they should be avoided to the maximum extent feasible. If threatened or endangered plants, such as thread-leaved brodiaea, are detected during the survey, the project proponent or representative shall consult with the applicable wildlife agencies to determine appropriate mitigation.

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

Less than Significant Impact with Mitigation. According to the Biological Technical Report (see Appendix G), the project site does not contain any federal or state jurisdictional areas. The proposed project would have no substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wild Service. Direct and indirect impacts to coastal sage scrub would be potentially significant as detailed above. However, because the project site is void of riparian corridors and sensitive habitat, no impacts to riparian habitat or sensitive natural communities would occur. Potentially significant impacts to coastal sage scrub would be mitigated through implantation of mitigation measures **BIO-1** and **BIO-2**, detailed above.

- 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?*

Less than Significant Impact. No wetlands or potentially jurisdictional waters were noted within the project site during the field survey, and the National Wetlands Inventory and National Hydrography Dataset did not show any mapped wetlands, waters, or riparian features within the project site per the Biological Technical Report (see Appendix G). Within the 300-foot buffer portion of the survey area, a perennial drainage was identified that runs along the east side of Garrison Street. Although dominated by cattails, this area is within a concrete-lined ditch and as such is better classified as a Disturbed Wetland. In addition, within the 300-foot buffer portion of the survey area, there is a stream tributary to Loma Alta Creek with disturbed wetlands approximately 110 feet east of the project site. The stream channel contained water at the time of the October 2024 survey and is identified in National Hydrography Dataset as a canal/ditch. There is also an upland ephemeral brow ditch on the slope west of the school facility that drains into a storm drain. The brow ditch was dry at the time of the June 2024 survey. Despite the presence of these potentially jurisdictional waters, the project's proposed work would be limited to the project site and appropriate BMP measures

would be undertaken during construction to avoid impacts to these potential resources. Therefore, no impacts to either of these potentially jurisdictional aquatic features would occur from project implementation.

- 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?*

Less Than Significant Impact with Mitigation Incorporated. Per the Biological Technical Report prepared for the project (see Appendix G), the survey area is unlikely to serve as an important wildlife movement corridor or habitat linkage because the project site is mostly developed and cut off by roads and developed lands in all directions. However, per the draft SAP, the survey area is within the City's WCPZ, which encompasses a large area extending from the southern border of Marine Corps Base Camp Pendleton south to Buena Vista Creek and includes priority restoration areas for regional stepping-stone wildlife corridors. The draft SAP recommends the following avoidance and minimization standards be established for projects within this zone:

- Removal of native habitats shall be avoided to the maximum extent feasible, without precluding reasonable use of the property.
- New development on existing properties larger than 2 acres within this zone shall conserve at least 50 percent of the parcel as open space and may remove no more than 25 percent of the coastal sage scrub habitat. This standard must be applied prior to any splitting or combining of existing lots, unless it can be proven that applying the standard after combining lots provides for superior biological conservation value.
- Deviations from these standards can be approved only if 1) the amount of the conservation deficit is provided elsewhere within the WCPZ and is provided in addition to all other required mitigation, and 2) the alternative solution provides biologically superior conservation value as determined by the City and the Wildlife Agencies.

In addition, mature trees and ornamental and naturalized vegetation may be used by various migrating birds as well as resident species that commonly occur in residential areas.

Nesting raptors and other nesting native birds protected under the Migratory Bird Treaty Act and California Fish and Game Code may be directly impacted by ground disturbance and the removal of vegetation and structures on the project site as well as indirectly impacted by noise disturbance. Therefore, direct and indirect impacts to nesting migratory birds would be potentially significant. Due to the presence of native habitats within the project site, the following measure is recommended based on the draft SAP. Mitigation measure **BIO-4** recommends educational materials be distributed by the project applicant to future landscaping companies working on the project site during operations and that a pre-construction survey be completed prior to ground disturbance. With implementation of mitigation measure **BIO-4**, impacts to migratory birds would be reduced to less than significant. Mitigation measure **BIO-5** recommends that a monitoring biologist shall be on-site due to the requirement of biological mitigation measures and the presence of native habitats within the site.

Mitigation Measures

BIO-4: Migratory Bird and Raptor Nest Buffers

The project applicant shall develop an educational pamphlet (in English and Spanish) for the identification of raptor nests and to guide tree pruning activities in suburban areas during the breeding season. Landscaping companies and tree trimming services that have projects in the City shall be required to use the pamphlet to educate their employees on the recognition of raptor nest trees. Trimming of trees containing raptor or migrating bird nests shall be prohibited during the raptor breeding season (January 15 to August 31). Human disturbance shall be restricted around documented nesting habitat during the breeding season based on the following: To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat will occur outside of the breeding season (January 15 to August 31). If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the applicant shall retain a City-approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 300 feet of the construction area, and federally- or State-listed birds and raptors on or within 500 feet of the construction area. The pre-construction survey must be conducted within 10 calendar days prior to the start of construction, the results of which must be submitted to the City for review and approval prior to initiating any construction activities. If nesting birds are detected by the City-approved biologist, the following buffers shall be established: 1) no work within 300 feet of a non-listed nesting migratory bird nest, and 2) no work within 500 feet of a listed bird or raptor nest. However, the City may reduce these buffer widths depending on site-specific conditions (e.g., the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction must take place within the recommended buffer widths above, the project applicant will contact the City and Wildlife Agencies to determine the appropriate buffer.

BIO-5: Biological Monitor

A monitoring biologist shall be on site during initial clearing and grubbing of all native habitats to ensure compliance with all conservation measures. The biologist must be knowledgeable of the covered species biology and ecology. The biological monitor should flush birds out of habitat areas before they are cleared. The biological monitor shall prepare periodic construction monitoring reports and a post-construction report to document compliance.

Therefore, with implementation of the mitigation measures above and the SAP's recommended avoidance and minimization standards, impacts to migratory wildlife or nurse site would be less than significant.

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

Less than Significant Impact. The project would be subject to the policies of adopted Land Use Element Section 1.22 Landscaping, which requires projects to retain existing mature trees wherever possible and to replace trees that are removed. The City's Code of Ordinances (Section 31A.1) outlines limited provisions and guidelines for tree removal and maintenance within streets and parkways within the City. Any trees that are intended for removal as part of a project may require a removal permit and must be approved by the Planning Director or Superintendent. Although tree replacement is not specified in the City's Code of Ordinances, the City has the authority to require mitigation during the permitting process. The project site is surrounded by a residential neighborhood and ornamental vegetation. Per the Tree Survey and Arborist Report (see Appendix D) prepared for the project, the trees on the project site are mostly ornamental trees of the species Aleppo pine and no mature native trees were observed on the project site. A majority of the trees appear to be regularly maintained and are able to be preserved, but several show indications of infection, disease, and potential failure. These would likely require removal and replacement. The project would replace 18 on-site trees in accordance with the City-approved tree list and several on-site trees would

be preserved. Therefore, the project would incorporate tree replacement as a condition of the project at the discretion of the City during the permitting process and would otherwise not conflict with any local policies or ordinances protecting trees. Impacts would be less than significant.

- 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 Impact. Per the Biological Technical Report (see Appendix G), the project is within the MHCP, a regional conservation plan established by SANDAG to protect sensitive species and habitats. Each jurisdiction that is a signatory to the MHCP implements the program through their respective subarea plan. While the City's draft SAP has not been adopted, it is used to provide guidance for development and mitigation. Per the draft SAP, the project site is outside of Softline and Hardline Preserve areas, the Coastal Zone, Off-site Mitigation Zones, and pre-approved mitigation areas. The survey area is not within any of the restoration areas targeted within the corridor and is outside of all Regional Corridors and Local Gnatcatcher Corridors designated in draft SAP Figure 3-6. As noted above under the analysis for issue (d), the project site is located within the WCPZ and would implement all avoidance and minimization standards required for all properties within this zone. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.5 CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of CEQA?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of CEQA?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

14.5 CULTURAL RESOURCES

Analysis:

- a. *Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of CEQA?*

Less than Significant Impact. The project proposes to demolish the existing abandoned school buildings (ten detached, one-story buildings) on the project site to construct a multi-family development. The buildings are all separated by outdoor courtyards and linked by concrete walkways on all sides. The buildings are divided into the original 1970 buildings (Units A through D) and the prefabricated and portable classroom buildings installed between 1985 and 2016 (identified as Buildings 5 through 10 in the Historical Resource Analysis Report [HRAR] prepared for the project [Appendix H]). Initially planned and designed in 1966, the E.G. Garrison Elementary School was constructed in 1970 in the Loma Alta neighborhood of Oceanside. The school was designed by architect Samuel W. Hamill and constructed by the Chamac Construction Company of Escondido. All four original buildings were constructed in a similar fashion with a rectilinear floorplan atop a concrete foundation. The HRAR (see Appendix H) prepared for the project determined that the E.G. Garrison Elementary School property does not meet the definition of a historical resource under CEQA. Historical research and field survey observations informed the significance evaluation of the school property under the Local Register and CRHR criteria, as detailed below. These eligibility criteria establish a threshold under which a property may be determined to meet the definition of a historical resource for the purposes of CEQA and the local discretionary review process.

The E.G. Garrison Elementary School property is not significant under CRHR Criterion 1 (associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States) or Local Register Criterion A (exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, or architectural history) as it has not been identified as having a direct individual association with, or exemplification or reflection of a significant event in Oceanside, San Diego County, California, or United States history. The school was one of several schools that were constructed locally at the tail-end of the larger post-World War II (WWII) period, generally defined as ca. 1945-1968. In this period, the entire state and country was in a substantial pattern of suburban development with capital improvements like utilities, schools, parks, etc., constructed to support expanding populations. No specific information was identified to call out the E.G. Garrison Elementary School property as having a more unique history than other schools and capital improvements built to support the growing city and population. E.G. Garrison Elementary School is not among the early post-WWII schools that may be directly associated with the post-WWII population boom in Oceanside and the greater San Diego region. For this reason, the property is not recommended eligible under CRHR 1/Local Register A.

No information was identified that would suggest the E. G. Garrison Elementary School property has a direct association with an individual significant in local, state, or national history. The school was named after Elra G. Garrison, who served on the Oceanside Union School District as Assistant Superintendent, Business Services and Deputy Superintendent until his retirement in 1965. Mr. Garrison died in 1973, within three years of the school's completion. To date, Mr. Garrison has not been identified as an important person in local history, and because he is not directly associated with the school's design, construction, administrative management, or education functions having retired in 1965 prior to the school's design and construction, the school is not directly associated with Elra Garrison. For this reason, the E.G. Garrison Elementary School property is not recommended eligible under CRHR 2 (Associated with the lives of persons important to local, California, or national history) or Local Register B (identified with persons or events significant in local, state, or national history).

Per the HRAR, the design for E.G. Garrison Elementary School is similar to many suburban schools designed in California in the larger post-WWII period, ca. 1945-1968, specifically in the 1950s and early-to-mid-1960s. By the time the E.G. Garrison Elementary School design was produced, in 1966, and built, in 1970, the design, style, and aesthetic employed were no longer regarded as innovative or distinctive. By 1970 these designs had been recycled and built throughout California communities and may be described as 'off the shelf' and redundant. The school design is a late example of Mid-Century Modern school design that does not embody the distinctive characteristics of the type or style, nor does it feature the distinctive characteristics of the next iteration of school design – Open Education. The E.G. Garrison Elementary School design also does not appear to embody the distinctive characteristics of an open education school as it does not appear to feature open classrooms free of dividing walls or partitions. For these reasons, the HRAR determined that E.G. Garrison Elementary School property is not eligible under CRHR 3 (embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values) or Local Register C (embodies distinct characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship).

The E.G. Garrison Elementary School was determined to not be eligible under CRHR Criterion 3 (embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values) or Local Register D (representative of the notable work of an acclaimed builder, designer, or architect). Although the E.G. Garrison Elementary School was designed in 1966 by Samuel Wood Hamill, FAIA, who is now recognized as a notable and Master Architect by the City of San Diego Historical Resources Board and in the San Diego region, the design does not appear to be a notable or masterful example of Mr. Hamill's work. The design appears to be fairly repetitive to schools built in the 1950s and 1960s, and without masterful or notable design intervention by Mr. Hamill. The design occurred in the last few years of Mr. Hamill's design career and is generally regarded as being outside his

period of significance as a practicing architect, established as ca. 1930 to ca. 1965. The E. G. Garrison Elementary School has not been found to have significant characteristics by the City Council for inclusion in the local register and therefore is not eligible under Local Register E. The property is not eligible under CRHR Criterion 4 (has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation). Further study of the property would not yield information important to local, regional, state, or national history. While the property retains some aspects of integrity, further integrity analysis is not merited due to the property's overall lack of significance as defined above. Therefore, implementation of the project would result in a less than significant impact to a historical resource.

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

Less than Significant Impact with Mitigation. An Archaeological Resources Survey Report (Appendix I) was prepared for the project which detailed the archaeological resources surveys conducted for the project site, and details the background research completed, the review of historic topographic map and aerial photographs for the project site, and the results of the pedestrian survey of the project area completed for the project. This report was prepared to provide necessary information to identify adverse impacts to potentially significant archaeological resources by implementation of the proposed project.

Prior to the survey, a records search was requested from the South Coastal Information Center (SCIC) to identify any previously recorded cultural resources located within a one-mile radius of the Area of Potential Effect (APE). The SCIC records search indicated that there have been 76 cultural investigations conducted within one mile of the APE, four of which include the APE. These cultural resources include 10 prehistoric sites, 2 prehistoric isolated artifacts, 2 historic-era sites, 1 multicomponent site (a site composed of both prehistoric and historic resources), and 1 site that has been subsumed by another prehistoric site. The prehistoric sites include lithic scatters, ceramic scatters, ground stone scatters, marine shell scatters, and one hearth. The historic-era resources represent trash scatters. The multicomponent resource includes lithic, ground stone, ceramic and shell scatters, with historic adobe remnants, historic ceramics, burials, and glass beads. Three historic addresses are also identified within the one-mile search area. However, none of these resources occur within the APE.

In addition, a letter was sent on May 15, 2024, to the NAHC requesting a search of their Sacred Lands File to identify spiritually significant and/or sacred sites or traditional use areas in the project vicinity. The NAHC was also asked to provide a list of local Native American tribes, bands, or individuals that may have concerns or interests regarding cultural resources potentially occurring within the area of potential effect. The NAHC responded on May 29, 2024, indicating that their search results were positive.

As stated above, two pedestrian surveys of the project site were completed by an archaeologist and Luiseño Native American representative. The primary goal of these surveys was to determine (1) if there are previously unrecorded cultural resources present, and if so, document the resources' locations and what they consist of and (2) to update conditions of previously recorded cultural resources. The project area and off-site project areas were inspected for evidence of archaeological materials such as flaked and ground stone tools or fragments, ceramics, milling features, and human remains. No prehistoric or historic-era cultural resources were observed during the survey of the APE.

The SCIC records search did not identify any cultural resources within the project APE; therefore, the project would not result in an adverse impact to known cultural resources. Because the entire project APE has been disturbed by the development of the school buildings and associated grounds, the possibility of buried intact significant cultural resources being present within the project APE is considered low. However, the NAHC indicated that their search of the Sacred Lands File was positive for the project APE vicinity. Due to the possibility that undisturbed and unrecorded archaeological resources could be discovered during grading activities, impacts to cultural resources from ground disturbance could be significant. Additionally,

the Luiseño Native American representative from Saving Sacred Sites and a Cupeño Native American representative has requested cultural monitoring, post demolition, for all ground disturbing activities within the APE. RECON Environmental, Inc. (RECON) anticipates that the local consulting tribe(s) will likewise request construction monitoring during the AB 52 consultation with the City. Mitigation measures **CUL-1** through **CUL-8** would require archeological and tribal cultural resource protocols be put in place prior to and during ground disturbing activities. The mitigation measures provide details on actions to be taken should cultural resources be discovered including collection, investigation, and date recovery. With implementation of mitigation measures **CUL-1** through **CUL-8**, potentially significant impacts would be reduced to less than significant levels.

Mitigation Measure

CUL-1: Prior to the issuance of a Grading Permit, the Applicant/Owner shall enter into a pre-excavation agreement, otherwise known as a Tribal Cultural Resources Treatment and Tribal Monitoring Agreement with the "Traditionally and Culturally Affiliated (TCA) Native American Monitor associated with a TCA Luiseño Tribe" and "Traditionally and Culturally Affiliated (TCA) Native American Monitor associated with a TCA Cupeño Tribe." Both monitors shall be retained unless one tribe defers to another. A copy of the agreements shall be included in the Grading Plan Submittals for the Grading Permit. The purpose of this agreement shall be to formalize protocols and procedures between the Applicant/Owner and the "Traditionally and Culturally Affiliated (TCA) Native American Monitors associated with a TCA Luiseño Tribe" and "Traditionally and Culturally Affiliated (TCA) Native American Monitor associated with a TCA Cupeño Tribe" for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and tribal cultural resources, located and/or discovered through a monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities. At the discretion of the Luiseño and/or Cupeño Native American Monitor(s), artifacts may be made available for 3D scanning/printing, with scanned/printed materials to be curated at a local repository meeting the federal standards of 36 CFR 79.

CUL-2: Prior to the issuance of a Grading Permit, the Applicant/Owner or Grading Contractor shall provide a written and signed letter to the City of Oceanside Planning Division stating that a Qualified Archaeologist and Luiseño and/or Cupeño Native American Monitor have been retained at the Applicant/Owner or Grading Contractor's expense to implement the monitoring program, as described in the pre-excavation agreement. Both monitors shall be retained unless one tribe defers to another.

CUL-3: The Qualified Archaeologist shall maintain ongoing collaborative consultation with the Luiseño and/or Cupeño Native American monitor during all ground disturbing activities. Both monitors shall be retained unless one tribe defers to another. The requirement for the monitoring program shall be noted on all applicable construction documents, including demolition plans, grading plans, etc. The Applicant/Owner or Grading Contractor shall notify the City of Oceanside Planning Division of the start and end of all ground disturbing activities.

CUL-4: The Qualified Archaeologist and Luiseño and/or Cupeño Native American Monitor shall attend all applicable pre-construction meetings with the General Contractor and/or associated Subcontractors to present the archaeological monitoring program. Both monitors shall be retained unless one tribe defers to another. The Qualified Archaeologist as well as the Luiseño Native American Monitor and the Cupeño Native American Monitor, unless one tribe defers to another, shall be present on-site full-time during grubbing, grading and/or other ground altering activities, including the placement of imported fill materials or fill used from other areas of the project site, to identify any evidence of potential archaeological or tribal cultural resources. All fill materials shall be absent of any and all tribal cultural resources.

CUL-5: In order for potentially significant archaeological artifact deposits and/or cultural resources to be readily detected during mitigation monitoring, a written "Controlled Grade Procedure" shall be prepared by

a Qualified Archaeologist, in consultation with the Luiseño and/or Cupeño Native American monitor, other TCA Luiseño and/or Cupeño Tribes that have participated in the state-prescribed process for this project, and the Applicant/Owner, subject to the approval of City representatives. Both tribes shall be consulted unless one tribe defers to another. The Controlled Grade Procedure shall establish requirements for any ground disturbing work with machinery occurring in and around areas the Qualified Archaeologist and Luiseño and/or Cupeño Native American monitor determine to be sensitive through the cultural resource mitigation monitoring process. The Controlled Grade Procedure shall include, but not be limited to, appropriate operating pace, increments of removal, weight and other characteristics of the earth disturbing equipment. A copy of the Controlled Grade Procedure shall be included in the Grading Plan Submittals for the Grading Permit.

CUL-6: The Qualified Archaeologist or the Luiseño and/or Cupeño Native American monitor may halt ground disturbing activities if unknown tribal cultural resources, archaeological artifact deposits or cultural features are discovered. Both monitors shall be retained unless one tribe defers to another. Ground disturbing activities shall be directed away from these deposits to allow a determination of potential importance. Isolates and clearly non-significant deposits will be minimally documented in the field, and before grading proceeds these items shall be secured until they can be repatriated. If items cannot be securely stored on the project site, they may be stored in off-site facilities located in San Diego County. If the Qualified Archaeologist and Luiseño and/or Cupeño Native American monitor(s) determine that the unearthed tribal cultural resource, artifact deposits or cultural features are considered potentially significant TCA Luiseño and/or Cupeño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the respectful and dignified treatment of those resources. The avoidance and protection of the significant tribal cultural resource and/or unique archaeological resource is the preferable mitigation. If, however, it is determined by the City that avoidance of the resource is infeasible, and it is determined that a data recovery plan is necessary by the City as the Lead Agency under CEQA, TCA Luiseño and/or Cupeño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the drafting and finalization of any such recovery plan. For significant tribal cultural resources, artifact deposits or cultural features that are part of a data recovery plan, an adequate artifact sample to address research avenues previously identified for sites in the area will be collected using professional archaeological collection methods. The data recovery plan shall also incorporate and reflect the tribal values of the TCA Luiseño and/or Cupeño Tribes that have participated in the state-prescribed consultation process for this project. If the Qualified Archaeologist collects such resources, the Luiseño and/or Cupeño Native American monitor(s) must be present during any testing or cataloging of those resources. Moreover, if the Qualified Archaeologist does not collect the tribal cultural resources that are unearthed during the ground disturbing activities, the Luiseño and/or Cupeño Native American monitor, may at their discretion, collect said resources and provide them to the appropriate TCA Luiseño and/or Cupeño Tribe, as determined through the appropriate process, for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Ground disturbing activities shall not resume until the Qualified Archaeologist, in consultation with the Luiseño and/or Cupeño Native American Monitor, deems the cultural resource or feature has been appropriately documented and/or protected.

CUL-7: The landowner shall relinquish ownership of all tribal cultural resources unearthed during the cultural resource mitigation monitoring conducted during all ground disturbing activities, and from any previous archaeological studies or excavations on the project site to the appropriate TCA Luiseño and/or Cupeño Tribe, as determined through the appropriate process, for respectful and dignified treatment and disposition, including reburial at a protected location on-site, in accordance with the Tribe's cultural and spiritual traditions. All cultural materials that are associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98. No tribal cultural resources shall be subject to curation.

CUL-8: Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusions of the archaeological monitoring program (e.g., data

recovery plan) shall be submitted by the Qualified Archaeologist, along with the Luiseño and/or Cupeño Native American monitor(s) notes and comments, to the City of Oceanside Planning Division for approval.

c. *Disturb any human remains, including those interred outside of formal cemeteries?*

Less than Significant Impact with Mitigation. There are no known grave sites within the project limits. Therefore, the disturbance of human remains is not anticipated. However, in the unlikely event that human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of any human remains found immediately. If the remains are determined to be prehistoric, the Coroner will notify the NAHC which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the project site of the discovery and shall complete the inspection within 24 hours of notification by the NAHC. The MLD will have the opportunity to make recommendations to the NAHC on the disposition of the remains. The project would implement mitigation measure **CUL-9** to ensure work is halted should human remains be discovered. Therefore, impacts associated with the disturbance of human remains would be less than significant.

Mitigation Measure

CUL-9: Human Remains

As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Office of the Medical Examiner by telephone. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Medical Examiner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. If suspected Native American remains are discovered, the remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Luiseño and/or Cupeño Native American monitor(s). By law, the Medical Examiner will determine within two working days of being notified if the remains are subject to his or her authority. If the Medical Examiner identifies the remains to be of Native American ancestry, he or she shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall make a determination as to the Most Likely Descendent.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.6 ENERGY. Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during the project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.6 ENERGY

Analysis

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

Less than Significant Impact.

Construction

During construction, energy use would occur in two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. The project is a proposed residential community consisting of 140 three-story townhomes buildings. The scale and density of the residential development is unlikely to result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Construction is likely to span approximately 16 months, generating between approximately 15 to 30 vehicle trips a day from the local area during most construction phases, with grading and hauling phases generating between 101 and 512 trips, respectively. This is standard for a project of this size and scale per CalEEMod defaults based on the proposed land use and density for the project. In addition, the project would not require the excessive use of energy to operate the equipment necessary to construct the project for the same reasons. This would be unlikely to contribute to a wasteful, inefficient, or unnecessary use of energy resources.

Operations

CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of nonresidential and residential structures. CALGreen was adopted by reference by the City as Chapter 6 of its City Code. The mandatory measures are related to planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The project would be consistent with the policies of the adopted General Plan ECAE related to energy efficiency and renewable energy, including Policy 1a-2 which requires that new development supply a portion of its energy demand through renewable sources and Policy 1c-2, which requires the use of solar in new developments. To achieve this, the project would implement and enforce CCR Title 24 building standards (parts 6 and 11) to improve energy efficiency, design the project to be fully electric with no new gas connections, include a photovoltaic system, and would include EV chargers within each unit's garage. New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The compliance reports must demonstrate a building's energy performance through use of CEC approved energy performance software that shows iterative increases in energy efficiency given the selection of various heating, ventilation, and air conditioning; sealing; glazing; insulation; and other components related to the building envelope. Therefore, impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant.

- b. *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Less than Significant. The applicable state plans that address renewable energy and energy efficiency are CALGreen, the California Energy Code, and the Renewables Portfolio Standard (RPS). As discussed above in (a) above, the project would be required at a minimum to meet the mandatory energy requirements of CALGreen and the California Energy Code in effect at the time of development, as is consistent with its General Plan policies related to energy efficiency and renewable energy. New construction and major renovations must demonstrate their compliance with the current Energy Code and CALGreen through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The RPS promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. The project would be served by SDG&E, who, under SB 350 (2015), is required to achieve a renewable energy mix goal of 50 percent by the year 2030. Based on the latest report to the legislature, SDG&E has obtained 59 percent renewables as of 2022 (California Public Utilities Commission

2023). Implementation of the project would not interfere with SDG&E's progress towards achieving RPS goals.

In addition, the project would not conflict with the City's adopted CAP, which includes policies related to using energy more efficiently and pursuing clean and renewable energy sources. Per the CAP and Section 3047 of the Zoning Ordinance, development projects of this scale would be required to offset at least 50 percent of forecasted energy demand through on-site renewable energy sources. To comply with this requirement, the project would include solar photovoltaic panels to power the community. Therefore, there would be less than significant impacts related to obstruction of a state or local plan for renewable energy or energy efficiency.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.7 GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist, or based on other substantial evidence of a known fault (Refer to DM&G Pub. 42)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the 1994 UBC, creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

14.7 GEOLOGY AND SOILS

Analysis

- a. *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- (i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less Than Significant Impact. The nearest known active fault is the Newport Inglewood-Rose Canyon Fault located about seven miles to the southwest of the project site. However, per the Geotechnical and Infiltration Evaluation (Appendix J) prepared for the project, the project site is not located within an Alquist-Priolo Earthquake Fault Zone or Special Studies Zone and no known seismic faults traverse the City o. The project site, however, is within seismically active southern California and could be subject to earthquake risk and would be required to be designed and built in conformance with the Uniform Building Code (UBC), the City's Seismic Hazard Mitigation Ordinance, and other applicable standards. Therefore, impacts related to adverse effects from rupture of a known earthquake would be less than significant.

- (ii) *Strong seismic ground shaking?*

Less Than Significant Impact. The nearest known active fault to the project site is the Newport Inglewood-Rose Canyon Fault, located about seven miles to the southwest of the project site. The project site would thus be exposed to strong ground shaking in the event of an earthquake. Per the Geotechnical and Infiltration Evaluation (see Appendix J), due to the depth of relatively shallow bedrock beneath the project site, the project would be designed with the appropriate seismic design parameters to reduce risks associated with strong seismic ground shaking. However, the project would be required to be designed and built in conformance with the UBC, the City's Seismic Hazard Mitigation Ordinance, and other applicable standards. Conformance with standard engineering practices and design criteria would reduce the risk of loss, injury, or death associated with seismic ground shaking to less than significant levels.

- (iii) *Seismic-related ground failure, including liquefaction?*

Less Than Significant Impact. Liquefaction is the loss of strength of cohesionless soils when the pore water pressure in the soil becomes equal to the confining pressure. Liquefaction generally occurs as a "quicksand" type of ground failure caused by strong ground shaking. The primary factors influencing liquefaction potential include groundwater, soil type, relative density of the sandy soils, confining pressure, and the intensity and duration of ground shaking. The General Plan Public Safety Element requires that soil borings be taken on all proposed building areas prior to the issuance of building permits. These borings are generally used to identify water table levels and the presence of expansive soils, uncompacted fill, etc. to assess seismic related ground failure risk. Consistent with this element, the project completed exploratory borings as detailed within the Geotechnical and Infiltration Evaluation (see Appendix J).

Per the Geotechnical and Infiltration Evaluation (see Appendix J) prepared for the project, the project site is underlain with relatively dense alluvium and relatively shallow bedrock. Due to the dense and clayey nature of the subsurface soils and presence of relatively shallow bedrock, seismic induced ("dry sand") settlements are estimated to be minimal within the areas of alluvium. Therefore, as the liquefaction potential for the project site is considered low, there would be less than significant impacts associated with liquefaction induced ground failure.

(iv) Landslides?

Less Than Significant Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. Per the Geotechnical and Infiltration Evaluation (see Appendix J) prepared for the project, a site investigation for the project site did not find evidence of landslides or slope instabilities. The preparation of the evaluation is consistent with adopted General Plan Land Use Policy 1.152 (D), which requires expanded soils and geologic testing when deemed necessary to reduce risks to acceptable levels. However, the evaluation does note that the northwest portion of the project site is regionally geologically mapped as the “toe” of landslide deposits that descend from the adjacent properties and slopes to the west. Based upon review of aerial imagery, the adjacent properties to the west are comprised of a residential tract development with what appears to be a large, engineered slope descending to the project site. The landslide deposits on the descending slope appear to have been mitigated by means of industry standard slope grading and benching, V-ditch construction and surficial landscaping and the potential for landslides are considered low. Additionally, the application of site stabilization and soil compaction requirements, as well as other geotechnical recommendations required by the project Geotechnical and Infiltration Evaluation, design parameters established by the most recent CBC, and the City’s Seismic Hazard Mitigation Ordinance would reduce any potential impacts to less than significant levels. The project would also be required to be consistent with the City’s Grading Ordinance which would specify criteria concerning maximum slope, yards, stormwater runoff, slope stabilization, and treatment of expansive soils which would further reduce the risk of landslides on the project site.

Therefore, through regulatory and policy compliance, impacts related to landslides would be less than significant.

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

Less Than Significant Impact. Grading and trenching during the construction phase of the project would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. The project proposes the grading of the entire site (approximately 7.5 acres) after demolition of the existing pavement and structures, including approximately 81,873 cubic yards of cut and fill. This has the potential of subjecting the project site to substantial soil erosion unless construction implements best management practices. Short-term erosion and sedimentation impacts would be addressed through conformance with the City stormwater regulations including implementation of BMPs as detailed in the City’s BMP Design Manual. As noted in the general recommendations of the Geotechnical and Infiltration Evaluation (see Appendix J), the contractor would be required to comply with standard engineering practices for erosion control in accordance with the applicable grading ordinances of the County of San Diego, City, and the 2019 CBC during construction.

During operations, controlling surface drainage and runoff and maintaining a suitable vegetation cover through the incorporation of water quality controls can minimize erosion. As detailed under Section 14.10 Hydrology, the project would design drainage to flow over impervious surfaces such as driveways and roadways into an underground storage facility on-site which would reduce erosion potential from flooding or substantial runoff. In addition, the project would incorporate landscaping to further reduce erosion over pervious areas. Per the SWQMP prepared for the project (see Appendix C), as the project would ensure that post-development discharge rates and durations do not exceed pre-project rates through the incorporation of the underground storage facility which would store the required fraction of the designed captured volume and regulate flows downstream and thus further reduce downstream erosion potential. Implementation of the BMPs would reduce potential soil erosion impacts to less than significant levels.

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

Less Than Significant Impact. As noted above in (a), the project site is not located on an unstable geologic unit or unstable soils that would result in in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. No water extractions or similar practices are anticipated to be necessary that are typically associated with project-related subsidence effects. It is noted that a storm drain system exists in the northern portion of the school site that would require repair, removal and/or replacement. The failure of these storm drains had prompted the abandonment of the school due to subsidence and the appearance of sinkholes. However, per the Geotechnical and Infiltration Evaluation (see Appendix J), with the design recommendations regarding excavations, subsidence of future soils with implementation of the project would be less than significant. In addition, surface material which would be disrupted or displaced would be balanced and re-compacted on-site during project construction. Adherence to standard engineering practices, as well as project specific geotechnical recommendations, would result in less than significant impacts related to subsidence of the land. Therefore, impacts from being located on a geologic unit or soil that is unstable or that would become unstable would be less than significant.

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

Less Than Significant Impact. Per the Geotechnical and Infiltration Evaluation (see Appendix J) prepared for the project, the project site is underlain with relatively dense alluvium and relatively shallow bedrock which exhibit a low risk for expansion. During site investigations, deposits of undocumented fill soils were encountered in the explorations and some of these soils were tested to have a moderate to high potential for settlement due to the addition of water with or without additional loading. Deeper deposits of undocumented fill may be present in areas that were not explored which may present additional risk for settlement. However, remedial grading, consisting of overexcavation and recompaction of the upper site soils, would be recommended to provide a uniform bearing for the proposed structures to avoid risks associated with expansion and settlement. Impacts related to risks related to expansive soils would be less than significant.

- e. *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

No Impact. The project does not include the implementation of septic tanks or alternative wastewater disposal systems and therefore no impacts would occur related to septic tank support. The project would tie into existing wastewater systems.

- f. *Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

Less Than Significant Impact with Mitigation Incorporated. It is noted that most of the City is developed and thus, redevelopment projects that do not exceed the original depth of excavation are unlikely to encounter paleontological resources. The project is anticipated to excavate from a range 8 to 10 feet in depth. Per the Geotechnical Evaluation and Infiltration Report (see Appendix J), the project site is underlain by artificial fill ranging from approximately 1 to 2 feet in depth, followed by alluvium which ranges from 1 to 38.5 feet in depth, or by Silverado Formation sedimentary bedrock in other areas ranging from approximately 3 feet to 39.5 feet below the artificial fill. As noted in the County of San Diego Guidelines for Determining Significance for Paleontological Sensitivity (County of San Diego 2009), the Santiago Formation is a geologic unit with a moderate to high paleontological sensitivity and may contain fossils in previously undisturbed depths and areas. Therefore, impacts to previously undiscovered paleontological resources would be possible, and impacts have the potential to be significant. However, with implementation of mitigation measure **PALEO-1**, impacts would be reduced to less than significant in the event of an unanticipated discovery.

Mitigation Measure**PALEO-1:**

Prior to the issuance of grading permits, the applicant shall provide written confirmation to the City that a qualified paleontologist has been retained. A qualified paleontologist is defined as an individual with an MS or PhD in paleontology or geology who is familiar with paleontological procedures and techniques and has expertise in local geology, stratigraphy, and biostratigraphy. The qualified paleontologist shall perform the following:

- Attend the pre-construction meeting and provide worker environmental awareness training at the preconstruction meeting as well as at the jobsite the day grading is to be initiated. In addition, the qualified paleontologist shall inform the grading contractor and City Engineer of the paleontological monitoring program methodologies.
- Identification of where paleontological monitoring of excavations impacting the San Diego Formation, Old Alluvial Floodplain Deposits, and deep excavations (greater than five feet below the ground surface) in areas underlain by Young Alluvial Floodplain Deposits is required within the project site based on construction plans and/or geotechnical reports.
- Procedures for adequate paleontological monitoring (including necessary monitoring equipment), methods for treating fossil discoveries, fossil recovery procedures, and sediment sampling for microvertebrate fossils, including the following requirements:
 - A paleontological monitor shall be on-site at all times during the original cutting of previously undisturbed sediments of moderately to highly sensitive geologic units (e.g., San Diego Formation, Old Alluvial Floodplain Deposits, and excavations below a depth of five feet below the ground surface in areas underlain by Young Alluvial Floodplain Deposits) to inspect cuts for contained fossils. (A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.) The paleontological monitor shall work under the direction of a qualified paleontologist. Monitoring is not required during shallow excavations within Young Alluvial Floodplain Deposits.
 - Paleontological monitoring is not required in areas underlain by Artificial Fill unless grading activities are anticipated to extend beneath the veneer of fill and impact underlying geological units with moderate to high paleontological sensitivity (e.g., San Diego Formation, Old Alluvial Floodplain Deposits, or deeper excavations into Young Alluvial Floodplain Deposits).
 - If fossils are discovered, the qualified paleontologist and/or paleontological monitor shall recover them. The paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading within 50 feet of the resource to allow recovery of fossil remains. Because of the potential for the recovery of small fossil remains, it may be necessary in certain instances, and at the discretion of the qualified paleontologist, to set up a screen-washing operation on the project site. Alternatively, sediment samples can be collected and processed off-site.
- Paleontological reporting and collections management:
 - Prepared fossils along with copies of all pertinent field notes, photos, maps, and the final paleontological monitoring report discussed below shall be deposited in a scientific institution with paleontological collections such as the San Diego Natural History Museum within 90 days of completion of monitoring unless the City and the qualified paleontologist determine

the extent of fossils recovered will require more preparation, stabilization, and/or curatorial time. Any curation costs shall be paid for by the applicant.

- o A final paleontological monitoring report shall be completed. This report shall include discussions of the methods used, stratigraphy exposed, fossils collected, and significance of recovered fossils, and shall be submitted to the designated scientific institution within 90 days of the completion of monitoring unless the City and the qualified paleontologist determine the extent of fossils recovered will require more preparation, stabilization, and/or curatorial time.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.8 GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.8 GREENHOUSE GAS EMISSIONS

Analysis

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

Less Than Significant Impact. State CEQA Guidelines Section 15064.4 states that “the determination of the significance of greenhouse gas emissions (GHG) calls for careful judgment by the lead agency, consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project.” Section 15064.4(b) further states that a lead agency should consider the following non-exclusive factors when assessing the significance of GHG emissions:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

State CEQA Guidelines Section 15064(h)(1) states that “the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.” A cumulative impact may be significant when the project’s incremental effect, though individually limited, is cumulatively considerable.

The General Plan ECAE and CAP were prepared together and adopted in tandem in May 2019 (City of Oceanside 2019a and 2019b). The ECAE outlines goals and policies meant to incorporate the concept of sustainability into the City’s decision-making process, including its long-range planning projects,

development review protocols, community engagement efforts, and CIPs. The ECAE builds on the GHG emission inventories, emissions targets, reduction measures, and implementation actions identified in the CAP. The CAP is the technical document that implements the policies of the ECAE by providing specific GHG reduction targets aligned with state and regional goals. The CAP identifies GHG reduction targets to address per capita energy and water use, transportation, solid waste management, agriculture, and other sources of GHG emissions. The CAP provides GHG reduction strategies through a series of measures regarding energy and buildings, water and wastewater, solid waste, transportation and land use, and agriculture and forestry. The CAP is currently being updated as a part of the City's General Plan Update.

The significance of the project-related GHG emissions can be determined by evaluating the project's compliance with regulations or requirements adopted to implement statewide, regional, or local plans for the reduction or mitigation of GHG emissions. The state's 2030 target (reduce GHG emissions to 40 percent below 1990 levels by 2030) has been codified in law through SB 32 and the 2017 Scoping Plan (CARB 2017). Therefore, 2030 marks the next statutory statewide milestone target applicable to the project. The City's 2019 CAP is a qualified GHG emissions reduction plan in accordance with CEQA Guidelines Section 15183.5. CEQA Guidelines 15183.5(a) states that lead agencies may analyze and mitigate the significant effects of GHG emissions at a programmatic level, such as in a General Plan, a long-range development plan, or a separate plan to reduce GHG emissions. Later project-specific environmental documents may tier from and/or incorporate by reference the existing programmatic review. CEQA Guidelines Section 15183.5(b) states that public agencies may choose to analyze and mitigate significant GHG emissions in a plan for the reduction of GHG emissions. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of a CAP. The City's CAP seeks to align with state efforts to reduce GHG emissions while balancing a variety of community interests (e.g., quality of life, economic development, and social equity). The CAP quantified baseline and projected future GHG emissions from activities within the City. State GHG reduction efforts were first initiated by EO S-3-05 in 2005, which established a 2050 emissions target to stabilize the climate (CARB 2008). EO S-3-05 also established a 2020 GHG emissions target goal, which was later codified by the State Legislature as AB 32. EO B-30-15 then established an additional interim 2030 GHG emissions target, which was also codified by the State Legislature.

On a per-capita basis, the 2020 GHG emissions target requires that emissions be reduced to "about 10 tons per person by 2020" (CARB 2008), and the subsequent targets require that emissions be reduced to "no more than 6 MT CO₂E [metric tons of carbon dioxide equivalent] per capita by 2030 and no more than 2 MT CO₂E per capita by 2050" (CARB 2017). The City's CAP established GHG reduction targets for 2030 that are more rigorous than the state's 6 MT CO₂E per capita goal. The City's goal is to achieve GHG emission levels of 4 MT CO₂E per capita by 2020, 3.5 MT CO₂E per capita by 2025, and 3.0 MT CO₂E per capita by 2040. A 2050 target of 2.0 MT CO₂E per capita is established for the City consistent with recommendations of the 2017 Scoping Plan. As discussed in the CAP, to ensure the City remains on track to achieve the long-term reduction goals of the state, the City has implemented GHG reduction measures proactively. The CAP measures outline how the City will reduce its near-term GHG emissions and establish infrastructure to support continued reductions beyond 2030. The City is already projected to meet state-aligned per capita near-term emissions targets (2030); as such, reduction measures in the CAP (Chapter 3 of the CAP) were selected based on their ability to achieve long-term GHG emission reductions. Measures were focused on energy, water, solid waste, transportation and land use, and agriculture and forestry. Although the City's CAP predates CARB's 2022 Scoping Plan, the City's measures are consistent with CARB's recommendations for local actions focused on transportation electrification, vehicle miles traveled reduction, and building decarbonization (CARB 2022).

The City's CAP establishes communitywide GHG emissions reduction targets based on an efficiency/service population methodology. "Service population" is defined as the sum of the City's residents and workforce. The City issued a policy directive in May 2023 that provides direction on CEQA compliant analysis of GHG emissions associated with new development. The 2023 Policy Directive notes that many of the CAP measures are contingent upon the adoption of several ordinances addressing renewable

energy, electric vehicle charging facilities, and preferential parking, transportation demand management, and tree canopy. Accordingly, in the interim, all projects must demonstrate that associated GHG emissions fall below one of two efficiency thresholds noted below:

- Projects that will be implemented after 2020 and prior to end of 2025 must show that GHG emissions related to both construction and operations will not exceed 3.5 MT CO₂E per service population per year.
- Projects that will be implemented after 2025 must show that GHG emissions related to both construction and operations will not exceed 3.0 MT CO₂E per service population per year.

GHG emissions are by nature a cumulative impact; therefore, projects may rely on the City's CAP and efficiency thresholds to determine a project's impact on a project-level/cumulative-level basis. Chapter 4, Implementation of the City's CAP outlines how the CAP reduction measures will be implemented and establishes a mechanism for individual development projects to evaluate their consistency with the CAP through completion of a checklist. The City's CAP relies on a screening threshold based on land use size and a CAP Consistency Checklist to determine whether a project's emissions would be consistent with GHG emissions estimated within the City's CAP. Consistent with the California Air Pollution Control Officers Association CEQA and Climate Change document (CAPCOA 2008), the City has established a bright-line threshold of significance for GHG emissions impacts: 900 MT CO₂E annually, with construction-related emissions amortized over 30 years. Specifically, the City has determined that new development projects emitting less than 900 MT CO₂E annual GHG would not contribute considerably to cumulative climate change impacts, and therefore do not need to demonstrate consistency with the CAP strategies, and would be determined to not conflict with the CAP. The 900 MT CO₂E bright-line threshold represents a market capture rate of 90 percent of all development projects (CAPCOA 2008). The objective of the bright-line threshold is to set the emissions low enough to capture a substantial fraction of future residential and nonresidential development that will be constructed to accommodate future statewide population and job growth, while setting the emission threshold high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative statewide GHG emissions (CAPCOA 2008). The 90 percent capture rate of new development establishes a strong basis for demonstrating that cumulative reductions are being achieved across the state. Projects greater than 900 MT CO₂E would be required to show CAP Checklist consistency, which can be used to determine that the project would be consistent with the CAP. Essentially, to demonstrate that a project would comply with the CAP, requires a two-step process: the first step is a screening-level bright line threshold, which if exceeded, would require the second step, which is a CAP efficiency and CAP measures consistency analysis.

The project's GHG emissions were calculated using CalEEMod Version 2022.1 (CAPCOA 2022). CalEEMod can be used to calculate GHG emissions from mobile (on-road vehicles), energy (electricity and natural gas), area (landscape maintenance equipment), water and wastewater, solid waste, and refrigerant sources.

Construction Emissions

Construction activities emit GHGs primarily through combustion of fuels (mostly diesel) in the engines of off-road construction equipment, and through combustion of diesel and gasoline in on-road construction vehicles and construction worker commute vehicles. Smaller amounts of GHGs are also emitted through the energy use embodied in water use for fugitive dust control. Construction emissions were calculated using the parameters discussed in Section 14.3(b).

Mobile Emissions

Mobile source emissions would originate from traffic generated by the project. As discussed in Section 14.3(b), the project would generate 973 daily trips. CalEEMod default trip lengths and default vehicle emission factors for the soonest operational year of 2028 were used.

Energy Emissions

Energy use emissions are generated by activities that utilize electricity and natural gas as energy sources. GHGs are emitted during the generation of electricity from fossil fuels off-site in power plants. These emissions are considered indirect but are calculated in association with a building's overall operation. Electric power generation accounts for the second largest sector contributing to both inventoried and projected statewide GHG emissions. Electricity use does not result in emissions of criteria pollutants. Combustion of fossil fuel (natural gas) emits criteria pollutants and GHGs directly into the atmosphere. When this occurs in a building, it is considered a direct emissions source associated with the building. CalEEMod estimates emissions from the direct combustion of natural gas for space and water heating. However, as noted under Project Design Features, the project has been designed to be all electric (i.e., no natural gas appliances). This PDF was included in the modeling.

CalEEMod estimates emissions from energy use by multiplying average rates of residential energy consumption by the quantities of residential square footage entered in the land use module to obtain total projected energy use. This value is then multiplied by electricity and natural gas GHG emission factors applicable to the project location and utility provider.

The CEC adopted the 2022 Energy Code in August 2021, it took effect January 1, 2023. The Energy Code contains energy conservation standards applicable to particular end use categories for all new or altered residential and nonresidential buildings throughout California. Energy consumption values are based on the CEC's 2018–2030 Uncalibrated Commercial Sector Forecast and the 2019 Residential Appliance Saturation Survey. GHG emissions were calculated using the default CalEEMod Version 2022.1 emission factors.

The project would be served by SDG&E. Therefore, SDG&E's specific energy-intensity factors (i.e., the amount of CO₂, methane [CH₄], and nitrous oxide [N₂O] per kilowatt-hour) are used in the calculations of GHG emissions. Current and forecasted SDG&E energy-intensity factors are included in CalEEMod 2022.1. Emissions were modeled using the forecasted year 2028 energy-intensity factors. These emissions take into account the statewide RPS goals. As SDG&E continues to procure renewable energy sources in line with state goals, the energy-intensity factors will decrease.

Area Source Emissions

Area sources include criteria pollutant and GHG emissions that would occur from the use of landscaping equipment. The use of landscape equipment emits criteria pollutant and GHGs associated with the equipment's fuel combustion. Default statewide emission rates from landscaping equipment were developed using the CARB Small Off-Road Engines Model v1.1 (CAPCOA 2022). Area sources also include consumer products and architectural coatings. However, only criteria pollutant emissions are associated with these sources and not GHG emissions. Area source emissions were calculated using default CalEEMod emission factors.

Water and Wastewater Emissions

The amount of water consumed and wastewater generated by a project have indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat the water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both CH₄ and N₂O.

CalEEMod Version 2022.1 calculates outdoor water use based on the Department of Water Resources Model Water Efficient Landscape Ordinance and calculates non-residential indoor water used based on the Pacific Institute's *Waste Not, Want Not: The Potential for Urban Water Conservation in California 2003* (as cited in CAPCOA 2022). Wastewater treatment is based on the region-specific distribution of wastewater treatment methods (CAPCOA 2022). Water and wastewater emissions were calculated using default CalEEMod data.

Solid Waste Emissions

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. To calculate the GHG emissions generated by disposing of solid waste for the project, the total volume of solid waste was calculated using waste disposal rates identified by the California Department of Resources Recycling and Recovery. The methods for quantifying GHG emissions from solid waste are based on the Intergovernmental Panel on Climate Change method, using the degradable organic content of waste. GHG emissions associated with the project's waste disposal were calculated using these parameters.

Refrigerant Emissions

Small amounts of GHG emissions result from refrigerants used in air conditioning and refrigeration equipment. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Emissions due to refrigerants were calculated using CalEEMod default values, which are based on industry data from the U.S. EPA.

Total Project GHG Emissions

Table 8 summarizes the total construction-related GHG emissions. Based on guidance from the SCAQMD, total construction GHG emissions resulting from a project should be amortized over 30 years and added to operational GHG emissions to account for their contribution to GHG emissions over the lifetime of a project (SCAQMD 2009). Thus, total construction emissions were divided by 30 and added to the operational emissions.

Table 8 Project Construction-Related GHG Emissions (MT CO ₂ E per Year)	
Year	Project GHG Emissions
2026	790
2027	54
Total	844
<i>Amortized Over 30 Years</i>	28

Table 9 summarizes the total project GHG emissions.

Table 9 Total Project GHG Emissions (MT CO ₂ E per Year)	
Source	Project GHG Emissions
Mobile	795
Energy ¹	10
Area	2
Water	8
Waste	32
Refrigerants	<1
Construction (amortized)	28
Total GHG Emissions	876
Service Population	392
Emissions per Service Population	2.2
SOURCE: Appendix F, CalEEMod Outputs	
NOTE: Totals may vary due to independent rounding.	
¹ The project would be all electric (i.e., no natural gas appliances); thus, energy emissions shown here are only associated with electricity use.	

As shown, the project would result in a total of 876 MT CO₂E per year, which would be less than the screening level threshold. Per the City's 2023 Policy Directive, projects that will be implemented after 2025 and exceed the screening level threshold must show that GHG emissions related to both construction and operations will not exceed 3.0 MT CO₂E per service population per year. This calculation was performed for informational purposes. The project's service population was calculated using 2.8 persons per household which is based on the latest census data for the City (U.S. Census Bureau 2024). Using this rate, 140 units would result in a service population of 392 people. As shown, the project would result in an emission rate of 2.2 MT CO₂E per service population. Emissions would be less than the 900 MT CO₂E screening threshold and less than the City's 2023 Policy Direction emission threshold of 3.0 MT CO₂E per service population per year. Impacts would be 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 Impact. EO S-3-05 and EO B-30-15 established GHG emission reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target, which the state has achieved. As required by SB 32, CARB's 2017 Climate Change Scoping Plan outlines reduction measures needed to achieve the interim 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. The 2022 Scoping Plan was adopted in December 2022. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279.

Each Scoping Plan builds upon the successful framework established by the initial Scoping Plan and subsequent updates, while also identifying new, technologically feasible, and cost-effective strategies to ensure that California meets increasingly stringent GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Scoping Plan updates have continued to express optimism in meeting future year targets of 2050 and 2030, as evaluated in the 2014 and 2017 Scoping Plans (respectively), and most recently, the 2045 goal addressed in the 2022 Scoping Plan under EO B-55-18, which AB 1279 codified and expanded on.

The City is on track to meet state-aligned emissions reduction targets for 2030 without additional emissions reduction measures (City of Oceanside 2019b). However, the City understands that meeting long-term reduction targets requires aggressive action. As such, the City has developed near-term local GHG emissions targets more aggressive than state targets that put the City on a trajectory consistent with the

state's 2050 GHG emissions targets, which represent the level necessary to stabilize the climate in the latter part of the twenty-first century (City of Oceanside 2019b). Regarding AB 1279, it is important to note that the state's carbon neutrality goal does not preclude any individual project from emitting GHG emissions. AB 1279 codifies EO B-55-18; however, its enactment was linked to the concurrent enactment of SB 905, which requires CARB to create a Carbon Capture, Removal, Utilization, and Storage Program that, fundamentally, will sequester carbon emitted by other projects. Therefore, the state's carbon neutrality goal does not preclude all individual projects from emitting GHG emissions. As discussed above, the project would be consistent with the CAP and, therefore, would be consistent with state GHG reduction goals and progress towards achieving carbon neutrality.

At the regional level, SANDAG's 2021 Regional Plan has been adopted for the purpose of reducing GHG emissions attributable to passenger vehicles in the San Diego region. The 2021 Regional Plan is the 2050 RTP prepared by SANDAG and adopted in December 2021. The 2021 Regional Plan establishes an implementation plan for how the region will grow over the next 30 years. Developed in accordance with SB 375, the 2021 Regional Plan includes an SCS. An SCS demonstrates how the region will meet its GHG reduction targets through integrated land use, housing, and transportation planning.

The SCS focuses on the following five main strategies, referred to as the 5 Big Moves, that will result in a more efficient transportation system:

1. Complete Corridors – Complete corridors act as the backbone of the entire regional transportation system, using technology, infrastructure improvements, pricing, and connectivity to support all forms of movement.
2. Transit Leap – Transit leap offers people a network of high-capacity, high-speed, and high-frequency transit services that will incorporate new modes of transit while also providing improved existing services.
3. Mobility Hubs – Mobility hubs are the centers of activity where a high concentration of people, destinations, and travel choices converge. They offer on-demand travel options and safe streets to enhance connections to high-quality transit while also making it easier for people to take short trips without needing a car.
4. Flexible Fleets – Flexible fleets offer people a variety of on-demand, shared vehicles, including microtransit, bikeshare, scooters, and other modes of transportation, to connect them to transit and make travel easy within Mobility Hubs.
5. Next Operating System (OS) – Next OS refers to an integrated digital platform that ties the transportation system together. Next OS enables the transportation system to be managed in real time so that people can be connected immediately to the modes of transportation that work best for them for any given situation and at any time.

SANDAG's 2021 Regional Plan is not directly applicable to the project because the underlying purpose is to provide direction and guidance on future regional growth (i.e., the location of new residential and nonresidential land uses) and transportation patterns throughout the City and greater San Diego County, as stipulated under SB 375. CARB has recognized that the approved 2021 Regional Plan is consistent with SB 375. The 2021 Regional Plan is generally consistent with the local government plans. Since the project is within the scope of development that was anticipated in the General Plan and it would not conflict with implementation of its key goals and 5 Big Moves, it would not result in growth that would conflict with the 2021 Regional Plan.

The project would not generate GHG emissions that have a significant impact on the environment because it would result in GHG emissions that would be less than a 900 MT CO₂E screening threshold and less than the City's 2023 Policy Direction emission threshold of 3.0 MT CO₂E per service population per year. It would

therefore be consistent with the City's CAP, which is the most applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and the impact would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.9 HAZARDS & HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.9 HAZARDS & HAZARDOUS MATERIALS

Analysis:

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

Less than Significant Impact. The project would not involve the routine transport, use, or disposal of hazardous materials. The project is a residential use which is not associated with hazardous emissions or substantial use of hazardous materials. The residential project would include the use of common household hazardous substances that would be managed in accordance with applicable regulations. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant.

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

Less than Significant Impact. The project is not anticipated to result in a release of hazardous materials into the environment. As noted in Section 14.9(a), residential uses are not associated with hazardous emissions or substantial use of hazardous materials. However, the Phase I Environmental Site Assessment prepared for the project (Appendix K) noted that the project site is listed on HazNET and HWTS databases due to a 1999 listing that is related to asbestos-containing waste. Although not a recognized environmental condition, the known presence of asbestos and lead containing materials within structures represents an environmental concern on the project site. These structures would be demolished and hauled off-site and would not continue to impact future uses on the project site. Demolition of the existing buildings would be done in accordance with all previous conclusions and recommendations provided in the Asbestos and Lead Survey by Weis Environmental, LLC, dated May 17, 2021 (see Appendix C of Appendix K) as well as the applicable state regulations by properly qualified and/or licensed workers which would safely reduce risks involving the release of this hazardous material into the environment. The Asbestos and Lead Survey recommended that all asbestos containing materials (1 percent or greater) must be removed and disposed of prior to demolition. Additionally, all asbestos abatement must be performed by a licensed asbestos abatement contractor. The contractor must profile and properly dispose of all abatement and/or demolition derived waste including lead containing ceramic tile, universal waste and any others.

During the short-term period of project construction, there is the additional possibility of accidental release of hazardous substances such as spilling of hydraulic fluid or diesel fuel associated with construction equipment maintenance. The level of risk associated with the accidental release of these hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials. The contractor would be required to use standard construction controls and safety procedures which would avoid and minimize the potential for accidental release of such substances into the environment and cleanup of any such occurrences would be managed through regulatory requirements. Therefore, impacts related to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions would be less than significant.

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

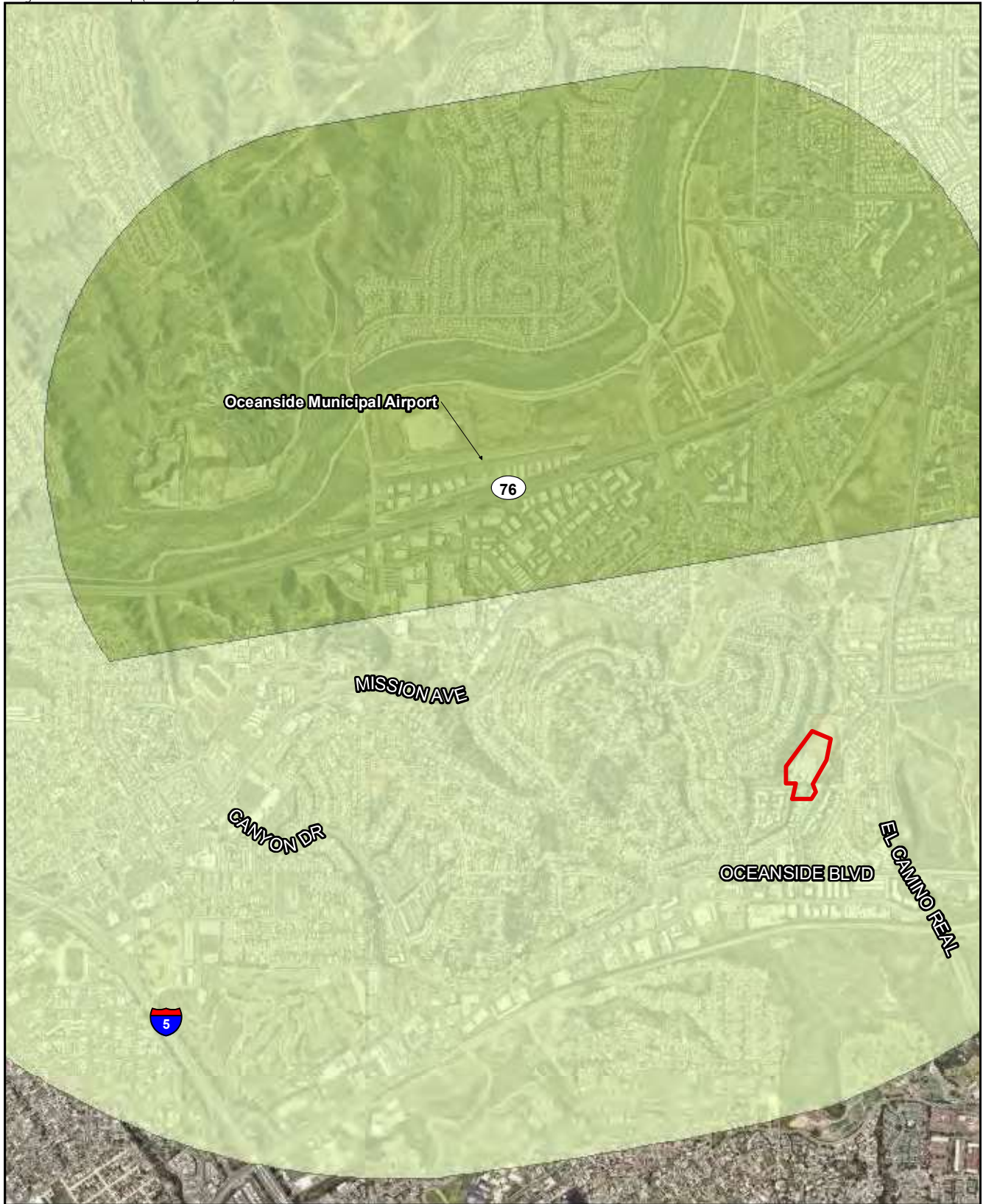
No Impact. No existing or proposed school facilities are located within a one-quarter mile radius of the project site. The project site is a former elementary school that was abandoned four years ago. The nearest elementary school (Mission Elementary School, 2100 Mission Avenue) is located approximately 2.2 miles from the project site and the nearest high school (Oceanside High School located at 1 Pirates Cove Way) is located approximately 3 miles from the project site. Therefore, there would be no impacts resulting from emissions of hazardous emissions 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?*


No Impact. According to Phase 1 Environmental Site Assessment prepared for the project (see Appendix K), the proposed project site is not included on the Cortese List. Therefore, there would be no impacts resulting from being located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List).

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

Less than Significant. The project site is located approximately 2.2 miles from the Oceanside Municipal Airport and is located within the Oceanside Municipal Airport Influence Area Review Area 2 (San Diego County Regional Airport Authority 2010; Figure 9). As identified by the Oceanside Municipal Airport Land Use Compatibility Plan, projects within Review Area 2 would be subject to the ALUCP regulations (San Diego County Regional Airport Authority 2010). Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. The recordation of overflight notification documents is also required in locations within Review Area 2. Overflight Notifications are generally appropriate in areas outside the area exposed to 60 dB CNEL, outside safety zones, and within areas where the height of structures and other objects would not pose a significant potential of being airspace obstruction hazards. The project site is not within Safety Zone or noise compatibility areas. The heights of the structures (36 feet) would also not pose a safety risk requiring review by the ALUC, which are typically projects with a height greater than 35 feet above ground level. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the project area and impacts would be less than significant.



 Project Boundary

 0 Feet 2,000



AIA Influence Area

 Review Area 1

 Review Area 2

FIGURE 9
Oceanside Municipal Airport –
Airport Influence Area

- f. *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less than Significant Impact. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Per the California Fire Code, adopted by reference in Chapter 11 Section 11.18 of the City's Code of Ordinances, the project would be subject to Fire Department review as part of the application review process, ensuring adequate emergency access and consistency with Fire Department evacuation procedures. The project would be designed, constructed, and maintained in accordance with applicable standards associated with the City's Local Hazard Mitigation Plan which falls under the County's Multi-Jurisdictional Hazard Mitigation Plan (County of San Diego 2023), including the provision of adequate emergency access and access to evacuation routes. As shown in the site plan (Figure 3), the project site would be accessed via a driveway along Garrison Street. The project site would be connected internally by a series of private drives, and an off-site secondary emergency access only roadway would connect to Private Drive "A" along the northeastern edge of the project site. These private drives would be 28 feet wide and would connect to 24-foot-wide private drives. These private drives would be designed consistent with the City's roadway standards and would not physically interfere with emergency access throughout the project site, per General Plan CF Element Policy 12.5. The project would meet City's Fire Department site design and construction design standards. The proposed residential buildings and infrastructure would be constructed per fire codes and comply with applicable City regulations. The project would provide adequate turn-around radii for fire trucks within the internal roadway network and would comply with applicable City fire-related regulations including the provision of secondary/emergency access.

The project would not interfere with any off-site roadways in a way that would impact adopted evacuation routes. Adherence to applicable emergency planning standards and adopted General Plan policies would ensure that the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be 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 Impact. State law requires CalFire to identify areas, or zones, of very high fire hazard severity potential under the Fire and Resources Assessment Program as FHSZ. These VHFHSZ are considered Local Responsibility Areas, where local governments have fiscal responsibility for wildfire protection. In addition, the wildland-urban interface (WUI) is an area where structures and other human development meets or intermingles with undeveloped Wildlands. The mapped WUI includes these areas mapped as VHFHSZ. The project site is not located in a designated VHFHSZ nor in a WUI area per CalFire's Fire Hazard Severity Zones (CalFire 2024). The project would adhere to fire prevention regulations as detailed in the California Fire Code. Adherence to fire regulations includes adopting safety measures during construction activities, and installation and maintenance of fire preventive and protective features including fire sprinklers and landscape restrictions prior to occupancy. Management of landscape materials would also help prevent or reduce the spread of wildfire.

The project would be designed to minimize potential hazards from wildfire through incorporation of site design features including construction materials, site access and fire apparatus support, and water systems. Implementation of these measures would ensure the project would not expose people or structures to a significant risk of wildland fires because the project site is not mapped within a WUI or VHFHSZ.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.10 HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.10 HYDROLOGY AND WATER QUALITY

Analysis:

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

Less Than Significant. All development and redevelopment projects are obligated to comply with federal, state, and local stormwater regulations during the planning, construction, and post-construction phases of development. Per the SWQMP prepared for the project (see Appendix C), the project qualifies as a priority development project and is therefore subject to requirements of the BMP Design Manual. All priority development projects must implement structural BMPs for stormwater pollutant control. Consistent with the City's Jurisdictional Runoff Management Plan (JRMP), the project would be required to include project-specific BMPs and water quality treatment features that would ensure the project would not contribute to the impairment of the watershed (City of Oceanside 2022).

Compliance with the statewide NPDES General Permit for Stormwater Discharges Associated with Construction Activity would prevent stormwater pollution from impacting surface waters during construction. Projects entering the construction phase of development are regulated under City Grading and Erosion Control Ordinances.

The project includes an on-site drainage and stormwater collection system to collect and convey on-site stormwater through the project site, ultimately connecting to the off-site public stormwater system. On-site runoff would be captured by proposed inlets, and then directed to the south/southeast, where it would be routed to a new underground stormwater storage vault at the project site's southern end. This facility is specifically designed to store the designated capture volume and regulate flows to the underground

stormwater system to meet water quality requirements. Additionally, the underground storage facility would provide essential storage and flow control for the 100-year peak flows during storm events. The discharge from the underground storage facility and the biofiltration BMP would be directed through a corrugated metal pipe arch and subsequently flow into Garrison Creek and then to Loma Alta Creek and ultimately discharging into the Pacific Ocean via the Loma Alta Slough. As the Loma Alta Creek and Slough are considered 303(d) impaired water bodies, discharge into these water bodies must be treated as detailed in the project's SWQMP. In addition, runoff from project driveways would be self-retaining and self-treating, utilizing permeable pavers to treat runoff from these areas to meet water quality standards prior to being released into a subdrain. Implementation of the project's stormwater system, including treatment and source control BMPs would ensure that project impacts would be less than significant related to the violation of 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?

Less Than Significant Impact. The City's current water supplies include raw and treated water purchased from San Diego County Water Authority, desalinated local groundwater from the Mission Basin, and non-potable recycled water. As detailed in the 2020 UWMP, the City's total water supply is expected to increase by approximately four percent by 2045. Although this project would increase residential land uses compared to the model used to develop the 2020 UWMP, increased growth is forecasted and anticipated supplies would be available to serve the project. Per the 2020 Urban Water Management Plan (City of Oceanside 2021), there would be sufficient water supplies from a variety of sources, including groundwater, to supply anticipated growth throughout the City. Per the Geotechnical and Infiltration Evaluation (see Appendix J), groundwater is located approximately 25 to 35 feet below ground surface with a flow towards the southeast. Per the Drainage Study (Appendix L), the project site is not conducive to recharge due to the paved nature of the surface and the infiltration capabilities of the underlying soils. Therefore, impacts would be less than significant related to the depletion of groundwater supplies or the interference with groundwater recharge on the project site.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

- i. result in substantial erosion or siltation on- or off-site;*
- ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*
- iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*

Less Than Significant Impact. The project site is relatively flat, sloping down towards the southern end of the parcel with large slopes on the western edge. A small pond is located southeast of the project site at the corner of Oceanside Boulevard and El Camino Real along the Garrison Creek Trail system; however, this is located approximately 0.6 mile downstream of the project site and would therefore not be impacted by project construction or operations. Per the SWQMP prepared for the project (see Appendix C), approximately 165,848 square feet of the total site is currently impervious. Per the Drainage Study (see Appendix L) under existing conditions, the 100-year storm event peak runoff to the existing three discharge locations is 12.87 cubic feet per second (cfs), 5.34 cfs, and 4.46 cfs. Under implementation of the project, the project site's total impervious surfaces would increase to 245,981 sf, an increase of 148 percent, which could impact existing drainage patterns and the volume of runoff from the project site. The project proposes a new network of stormwater infrastructure that would consist of streets and associated utilities, including dual storm drain system (pipes, inlets, catch basins, brow ditches and cleanouts). One of the dual systems would collect and convey the on-site 100-year runoff through the project site to the proposed underground storage facility (corrugated metal pipe or equivalent). The second system (bypass storm drain system)

would replace the existing 30" storm drain that runs through the project site. The existing 30-inch storm drain would be removed. These proposed facilities are specifically designed to store the designated capture volume and regulate flows to the biofiltration system to meet water quality requirements. Additionally, the underground storage facility would provide essential storage and flow control for hydromodification management and attenuation of the 100-year peak flows. Under proposed conditions during a 100-year storm event, peak runoff flows would decrease to 10.85 cfs at the first discharge location and decrease to 2.00 cfs and 0.66 cfs at the other two locations (see Appendix L). Therefore, overall runoff rates would decrease post-construction. The flow from the project site is attenuated to make sure that the post-development flows would not exceed the capacity of the existing downstream drainage facilities (post-development flows compared to the existing flows).

During construction, BMPs and standard construction measures would be utilized to reduce erosion potential. Projects entering into the construction phase of development are regulated by the SWRCB and the City. Construction projects are required to demonstrate both intended and ongoing compliance with the City Grading and Erosion Control Ordinances, and the NPDES General Permit requirements. In addition, projects seeking approval of Grading Plans are obligated, by RWQCB and City regulations, to demonstrate compliance with State requirements for long-term inspection, operation, and maintenance of permanent BMPs through the implementation of an Operation and Maintenance Plan to control stormwater quality (City of Oceanside 2024a). The combined overall goal of the City and applicant is to produce a comprehensive stormwater management design that demonstrates compliance with all relevant local and state regulations to ensure minimal erosion stormwater runoff. This is consistent with General Plan LUE Policy 1.23.J, which requires that potential hazards of flooding, erosion and sedimentation shall be reduced by designing the project site drainage system to accommodate the existing upstream storm runoff and to coordinate with existing downstream conditions.

Therefore, through regulatory compliance, and reduction of stormwater flow through on-site drainage and hydromodification facilities, impacts related to substantial erosion, increased runoff, and off-site flooding would be less than significant.

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

Less than Significant Impact. The project site is located within Flood Zone X (i.e. 0.2 percent Annual Chance of Flood Hazard) as shown on FEMA Flood Insurance Rate Map number 06073C0754H per the Drainage Study (see Appendix L). Per Appendix C of the Geotechnical and Infiltration Evaluation (see Appendix J, the potential for secondary seismic hazards such as tsunami is considered negligible due to site elevation and distance from the Pacific Ocean (approximately 4.5 miles). The potential for secondary seismic hazards such as seiche is considered remote due to the project site elevation and distance to an open body of water. Therefore, the risk of pollutants related to project inundation is less than significant.

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

Less Than Significant Impact. The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The project would be required to prepare a SWPPP that would outline preliminary construction BMPs that would be implemented as PDFs, to minimize disturbance, protect slopes, reduce erosion, and limit or prevent various pollutants from entering surface water runoff. Implementation of these BMPs would ensure that construction activities would not result in polluted runoff from the project sites consistent with the requirements of NPDES permit. In addition, the project would be required to include BMPs that demonstrate compliance with the requirements outlined in the City's JRMP. The JRMP reflects the City's approach to protecting and improving surface water quality and municipal stormwater pollution prevention. Watershed management and pollution prevention strategies of the City's JRMP are closely aligned with the priority water quality conditions described in the Carlsbad and San Luis Rey Water Quality Improvement Plan and San Diego Basin Plan (City of Oceanside 2024b). Therefore, there would be less than significant impacts associated with conflict or obstruction of these plans.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.11 LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 impact?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.11 LAND USE AND PLANNING

Analysis:

a. *Physically divide an established community?*

No Impact. The project would not have an impact on the physical arrangement of an established community. The project proposes the redevelopment of an existing elementary school site in a residential community into a residential use. This project would not introduce new roadways that would bisect existing communities or limit existing access. Therefore, no impacts are anticipated to occur related to the division of 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 impact?*

Less than Significant Impact. The proposed project proposes a General Plan Amendment for the redesignation of the project site from Civic Institutional (CI) to Medium Density C (MDC-R) and a Zone Amendment (ZA24-00001) to change the zoning from Public Semipublic (PS) and Medium Density C (RM-C) to Planned Development (PD). Consistent with the PD zoning, a PDP has been prepared in accordance with the City’s Zoning Ordinance – Article 17, which outlines the specific requirements for a Planned Development District. The PDP serves as a development guide for the project site, including direction for land uses, development intensities, development regulations, as well as design guidelines while ensuring consistency with the goals and policies of the City’s General Plan LUE. The project would not conflict with relevant plans and policies, as follows:

- *San Diego Forward-The 2021 Regional Plan:* The project would generally be consistent with the goals of the 2021 Regional Plan, prepared by SANDAG to develop compact, walkable communities close to transit connections and consistent with smart growth principles. The project includes an internal network of pedestrian walkways that would connect residents to existing facilities along Garrison Street. Although the project does not propose new bicycle lanes, it places residents in close proximity to existing Class II bicycle facilities along Oceanside Boulevard and El Camino Real. Additionally, the project site is within a 0.5-mile walking distance of a transit line (Bus Route 318) serviced by North County Transit District. The 2021 Regional Plan is generally consistent with the local government plans. Since the project is within the scope of development that was anticipated in the General Plan and it would not conflict with implementation of its key goals and 5 Big Moves, it would not result in growth that would conflict with the 2021 Regional Plan. The adoption and implementation of the project would not conflict or be inconsistent with the 2021 Regional Plan.

- *City of Oceanside General Plan LUE:* As detailed in the relevant sections of this Initial Study, the project would be consistent with LUE policies adopted for the purpose of avoiding or mitigating an environmental impact. The project would be consistent with General Plan LUE Section 1.1 Community Values as it would propose a residential use consistent with the surrounding existing residential uses; this would ensure that no negative impacts would occur to surrounding conforming uses. As detailed under Section 12.4 Aesthetics, the project would be consistent with General Plan LUE Section 1.2 Site Design policies which require the project to be designed to maximize the quality views and vistas from the project site to the surrounding environment and to maximize efficiency, safety, convenience, and open space. The project site would also be consistent with General Plan LUE Section 1.23 Architecture, as the PDP would ensure a high quality of architectural form, treatments, and materials in addition to landscaping guidelines for the community. Additionally, the project site would be designed with adequate stormwater infrastructure to ensure that potential hazards of flooding, erosion, and sedimentation shall be reduced. Per General Plan LUE Section 1.12 Land Use Compatibility Policy C, the use of land shall not subject people to potential sources of objectionable noise, light, odors, and other emissions nor to exposure of toxic, radioactive, or other dangerous materials. The project is consistent with this policy as it proposes residential development which is not typically a land use that would introduce a source of potential objectionable light, odors, and other emissions nor to exposure of toxic, radioactive, or other dangerous materials. As detailed below under Section 14.13 Noise, the project is consistent with the City's Noise Control Ordinance and with the policies of the General LUE Section 1.14 Noise Control, which would ensure that the project would not be a source of potential objectionable noise. As detailed under Section 14.7 Geology and Soils, the project would not conflict with the policies of General Plan LUE Section 1.152 Seismic and Geologic Hazards as the Geotechnical and Infiltration Evaluation (see Appendix J) assesses seismic and geologic hazards and provides recommendations to ensure geologic stability and reduction of risks associated with geologic conditions.
- *City of Oceanside General Plan ERM Element:* As detail in the Regulatory Setting above, the project would be consistent with the objectives of the ERM Element and would ensure no environmental impacts related to open space, air quality management, vegetation and wildlife habitat, cultural sites, and water quality management.
- *City of Oceanside General Plan ECA Element/CAP:* It is noted that the ECA Element builds on the GHG emission inventories, emissions targets, reduction measures, and implementation actions identified in the CAP and would therefore ensure consistency with the CAP. As detailed under Section 14.8 Greenhouse Gas Emissions, the project would be consistent with Policies 1a-2 and 1c-2, as the project would supply a portion of its energy demand through renewable sources to the extent practical and would install photovoltaic system. To achieve this, the project would implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency, design the project to be fully electric with no new gas connections, include a photovoltaic system, and would include EV chargers within each unit's garage.

Therefore, significant environmental impacts from conflict with land use plans, policies, or regulations would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.12 MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

14.12 MINERAL RESOURCES

Analysis:

- 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. There are no known major mineral deposits within the City. Per the adopted General Plan ERM Element, there are two major mineral deposits within the City, with the more significant mineral extraction operation found along El Camino Real north of Oceanside Boulevard for silica sand. However, the majority of land within the City is designated as Mineral Resource Zone (MRZ) 3, land for which the significance of mineral resources cannot be determined, and MRZ-2, land for which adequate geologic information is not available. Neither of these MRZ categories are considered significant mineral resources. The project site is not located within the area with active mineral extractions. Therefore, the project would have no impact related to the loss of availability of a known mineral source.

- 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. Refer to the response to (a), above.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.13 NOISE. Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.13 NOISE

Analysis

- 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?*

Less than Significant Impact.

Construction Noise

The project would create a short-term impact in terms of construction noise. The Noise Control Ordinance has not established any upper limits for construction noise because it is temporary and will cease to occur after completion of the project construction. The Noise Control Ordinance regulates the timing of construction activities and includes special provisions for sensitive land uses. Section 38.17(h) of the Noise Control Ordinance prohibits construction between the hours of 10:00 p.m. and 7:00 a.m. Monday through Saturday. No construction activities shall occur outside of these hours, on Sundays, or federal holidays. The Noise Control Ordinance has not established any upper limits for construction noise. Table 7-10 of General Plan Noise Element provides standards for noise from non-transportation noise sources such as, but not limited to, industrial facilities, automotive servicing, car washes, equipment yards, nightclubs, hotels, and shopping centers. For the purposes of this analysis, the City is using a threshold of 75 dB(A) L_{eq} , which is the maximum noise level limits presented in Table 7-10.

Noise generated by construction and demolition equipment, including diesel engine-driven equipment used for site preparation and grading, building construction, loading, unloading, and placing materials and paving may temporarily impact nearby sensitive receptors. Residential uses surround the project site. Construction noise levels were modeled at the adjacent receivers assuming the simultaneous use of an excavator, grader, and scraper, which would generate a combined sound power level (L_{pw}) of 117.4 dB(A) L_{pw} . This noise level was modeled as an area source covering the entire project site. As discussed in the Noise Analysis (Appendix M) completed for the project, construction noise levels are anticipated to range from 55 to 69 dB(A) L_{eq} at the adjacent properties and would not exceed 75 dB(A) L_{eq} . Although the existing adjacent uses would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. As construction activities associated with the project would comply with the requirements of the Noise Control Ordinance, temporary ambient impacts associated with construction would be less than significant.

Traffic Noise Analysis

On-site Noise Compatibility

Operational noise was also modeled as part of the Noise Analysis (see Appendix M). Noise and land use compatibility is regulated by the Noise Element of the City's General Plan. As shown in Table 10, which includes the noise level standards as specified in the Healthy and Livable Communities Element², multi-family land uses are normally acceptable with noise levels up to 65 CNEL, conditionally acceptable with noise levels from 55 to 70 CNEL, normally unacceptable with noise levels from 70 to 75 CNEL, and clearly unacceptable with noise levels above 75 CNEL. Additionally, as shown in Table 11, the allowable noise exposure for outdoor activity areas is 60 CNEL and the allowable noise exposure for interior spaces in 45 CNEL.

² The Healthy and Livable Communities Element (HLC) noise goals and policies will replace the existing General Plan Noise Element if the GPU is adopted. The Draft GPU EIR was released for public review on June 3, 2024.

Table 10 Sound Level Limits Matrix							
Land Use Category	Exterior Day/Night Noise Levels DNL or L _{dn} , dB						Interpretation
	55	60	65	70	75	80	
Residential – Single-Family							<p>Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements</p> <p>Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.</p> <p>Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.</p> <p>Clearly Unacceptable: New construction or development clearly should not be undertaken.</p>
Residential – Multiple Family							
Transient Lodging – Motels, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert							
Sports Arena, Outdoor							
Playgrounds, Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

Table 11 Allowable Noise Exposure		
Land Use	Outdoor Activity ^{1,2} Areas [dB(A) CNEL] ³	Interior Spaces [dB(A) CNEL]
Residential	60 ⁴	45
Motels, Hotels	65	45
Hospitals, Residential Care Facilities, Schools, Libraries, Museums, Churches, Day Care Facilities	65	45
Playgrounds, Parks, Recreation Uses	65	50
Commercial and Office Uses	65	50
Industrial Uses	70	65

NOTE: Development proposed within the Oceanside Municipal Airport Area of Influence shall also be subject to the noise compatibility standards contained in the Airport Land Use Compatibility Plan (ALUCP).

¹For non-residential uses, where an outdoor activity area is not proposed, the standard does not apply. Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving use.

²Where it is not possible to reduce noise in outdoor activity areas to the allowable maximum, levels up to 5 dB higher may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

³dB(A) CNEL = A-weighted decibels community noise equivalent level.

⁴An exterior noise exposure level of 65 dB(A) CNEL is allowable for residential uses in a mixed-use project and for residential uses within the Oceanside Municipal Airport Area of Influence, pursuant to the noise compatibility policies contained in the ALUCP.

SOURCE: Appendix M, Noise Analysis

The main source of traffic noise at the project site is vehicle traffic on Garrison Street, Oceanside Boulevard, El Camino Real, and Mesa Drive. Vehicle traffic noise level contours across the project site were calculated using SoundPLAN. The results are summarized in Table 12.

Table 12 Vehicle Traffic Noise Levels (CNEL)			
Receiver	1 st Floor	2 nd Floor	3 rd Floor
1	58	59	59
2	59	59	59
3	58	58	58
4	57	57	57
5	53	53	54
6	47	49	51
7	31	33	35
8	30	32	35
9	33	34	37
10	54	54	54

CNEL = community noise equivalent level
SOURCE: Appendix M, Noise Analysis

As shown in Table 12, exterior noise levels are not projected to exceed 60 CNEL and would be considered normally acceptable with the City's noise compatibility standards. Therefore, the project would not expose receivers to exterior noise levels in excess of standards established in the City's General Plan, and impacts would be less than significant.

Interior noise levels can be reduced through standard construction techniques. When windows are closed, standard construction techniques provide various exterior-to-interior noise level reductions depending on the type of structure and window. According to the Federal Highway Administration Highway Traffic Noise Analysis and Abatement Guidance (Federal Highway Administration 2011), buildings with masonry façades and double-glazed windows can be estimated to provide a noise level reduction of 35 dB, while light-frame structures with double-glazed windows may provide noise level reductions of 20 to 25 dB.

The interior noise level standard for residential uses is 45 CNEL. As shown in Table 12, exterior noise levels are projected to be 59 CNEL or less. Standard light-frame construction would reduce exterior to interior noise levels by at least 20 dB. Assuming a 20 dB exterior to interior noise reduction results in interior noise levels that would be 39 CNEL or less. Therefore, the project would not expose receivers to interior noise levels in excess of standards established in the General Plan, and impacts would be less than significant.

Off-site Noise Compatibility

In addition, the project would contribute traffic to the local roadways as a residential project. An off-site traffic noise impact analysis was also prepared for the project to determine the noise level increase associated with the project. However, the project would not substantially alter the vehicle classifications mix on local or regional roadways, nor would the project alter the speed on an existing roadway or create a new roadway. Thus, the primary factor affecting off-site noise levels would be increased traffic volumes. While changes in noise levels would occur along any roadway where project-related traffic occurs, for noise assessment purposes, noise level increases are assumed to be greatest nearest the project site, as this location would represent the greatest concentration of project-related traffic. Long-term traffic noise that affects sensitive land uses would be considered substantial and constitute a significant noise impact if the project would:

- increase noise levels by 5 dB or more where the no project noise level is less than 60 CNEL;
- increase noise levels by 3 dB or more where the no project noise level is 60 CNEL to 65 CNEL; or
- increase noise levels by 1.5 dB or more where the no project noise level is greater than 65 CNEL.

The increases in vehicle traffic noise levels were calculated and are summarized in Table 13. As shown, vehicle traffic noise increases would not exceed the applicable thresholds. Therefore, operational roadway noise would not generate a substantial permanent increase in ambient noise levels for off-site noise sensitive land uses, and impacts would be less than significant.

Roadway Segment	Existing Noise Level	Year 2050 + Project Noise Level	Increase Over Existing	Threshold
Garrison Street	53.4	57.0	3.6	5.0
Oceanside Boulevard				
Foussat Road to Garrison Street	72.7	73.6	0.9	1.5
Garrison Street to El Camino Real	72.6	73.6	1.0	1.5
SOURCE: Appendix M, Noise Analysis. ADT = average daily traffic				

On-site Noise Analysis

Operational noise sources on the project site are anticipated to be typical of any multi-family residential neighborhood, such as vehicles arriving and leaving, children at play, and landscape maintenance machinery. None of these noise sources associated with multi-family uses are anticipated to violate the City's Code of Ordinances or result in a substantial permanent increase in existing noise levels. The project would include HVAC units. Noise levels due to HVAC units were modeled to determine if they have the potential to produce noise in excess of City limits. The applicable noise level limits for single-family and medium density multi-family residential uses are 50 dB(A) L_{eq} from 7:00 a.m. to 10:00 p.m. and 45 dB(A) L_{eq} from 10:00 p.m. to 7:00 a.m. (Table 14). As shown in Table 14, property line noise levels would range from 26 to 45 dB(A) L_{eq} during the daytime hours and 23 to 42 dB(A) L_{eq} during the nighttime hours. Noise levels would not exceed the applicable Noise Control Ordinance limits. Therefore, operational HVAC noise would not generate a substantial permanent increase in ambient noise levels for off-site noise sensitive land uses.

in excess of standards established in the City's Noise Control Ordinance, and impacts would be less than significant.

Table 14 HVAC Noise Levels at Off-site Receivers [dB(A) L _{eq}]		
Receiver	Land Use	HVAC Noise Level Daytime/Nighttime
1	Multi-family Residential – RM (Medium Density)	38/35
2	Multi-family Residential – RM (Medium Density)	36/33
3	Multi-family Residential – RM (Medium Density)	45/42
4	Multi-family Residential – RM (Medium Density)	43/40
5	Multi-family Residential – RM (Medium Density)	34/31
6	Multi-family Residential – RM (Medium Density)	33/30
7	Multi-family Residential – RM (Medium Density)	33/30
8	Multi-family Residential – RM (Medium Density)	30/27
9	Multi-family Residential – RM (Medium Density)	30/27
10	Multi-family Residential – RM (Medium Density)	26/23
11	Single Family Residential – RS (Single Family)	31/28
12	Single Family Residential – RS (Single Family)	34/31
13	Single Family Residential – RS (Single Family)	35/32
14	Single Family Residential – RS (Single Family)	36/33
15	Single Family Residential – RS (Single Family)	36/33
16	Single Family Residential – RS (Single Family)	36/33
dB(A) L _{eq} = A-weighted decibels equivalent noise level; HVAC = heating, ventilation, and air conditioning Source: Appendix M, Noise Analysis		

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

Human reaction to vibration is dependent on the environment the receiver is in, as well as individual sensitivity. For example, outdoor vibration is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying (FTA 2018).

Construction activities produce varying degrees of ground vibration depending on the equipment and methods employed. While ground vibrations from typical construction activities rarely reach levels high enough to cause damage to structures, special consideration must be made when sensitive or historic land uses are near the construction site. Construction activities that typically generate the highest levels of vibration are blasting and impact pile driving. However, the project would not include blasting or pile driving. The equipment that would be used during construction with the greatest potential to generate vibration would be loaded trucks. According to the FTA, loaded trucks generate vibration levels of 0.076 inch per second peak particle velocity at 25 feet, which would exceed 0.2 inch per second peak particle velocity at distances 10 feet or closer. The nearest structures are located approximately 10 feet or more from the edge of the project footprint. A loaded truck would not be located immediately adjacent to the building due to physical constraints. Rather, they would be located either on the adjacent roads or on the project site at distances greater than 10 feet from the adjacent buildings. All other construction equipment operating on-site would generate vibration levels that are less than a loaded truck. Therefore, the project would not generate excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant.

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

Less than Significant Impact. The Oceanside Municipal Airport is located north of SR-76 south of the San Luis Rey River, and east of Benet Road, approximately one mile north of the project site. The San Diego County ALUC prepares ALUCPs in order to promote compatibility between airports and the land uses surrounding them. ALUCPs set compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances. The Oceanside Municipal Airport ALUCP was prepared in 2010 and provides noise level contours and noise compatibility criteria for various land uses (San Diego County ALUC 2010). The quietest modeled contour, 60 CNEL, is considered the maximum acceptable level in the ALUCP for new residential uses. The project site is located well outside the 60 CNEL contour and therefore would not be exposed to aircraft noise levels that exceed 60 CNEL. Impacts associated with airport noise would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.14 POPULATION & HOUSING. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

14.14 POPULATION & HOUSING

Analysis:

- 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 Impact. The project would not induce substantial unplanned population growth through the proposed 140 residential units. SANDAG forecasting estimated an increase in population growth of approximately 7,616 by the year 2050. To accommodate this growth, the California Department of Housing and Community Development assigned a Regional Housing Needs Allocation to the City of 5,443 units, of which this project would assist the City in meeting. The population growth from implementation of this project would be consistent with the regional projections. Therefore, impacts from substantial unplanned population growth in an area would be less than significant.

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

No Impact. The project would not require the removal of existing housing as it proposes the redevelopment of an existing abandoned school site in a residential community and therefore would not displace existing people or housing which would necessitate the construction of replacement housing elsewhere.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.15 PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.15 PUBLIC SERVICES

Analysis:

1) Fire protection?

Less than Significant Impact. Proposed project implementation would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. The project does not propose new or expanded fire facilities or result in the need for new or expanded facilities. The project proposes the construction of 140 residential dwelling units which could result in an incrementally increased demand on fire protection services. However, per the LUE Policy 1.17, the City shall coordinate development to ensure that adequate public services and facilities are provided to serve future development. As such, the Fire Department reviews all development projects to ensure adequate coverage within their service area. The site would be served by City of Oceanside Fire Department Station 3, located approximately 0.6 miles from the site. Per LUE Policy 1.17.B, development review applications that are inconsistent with the capability of any public service agencies to provide cost-effective services shall not be approved.

In addition, the City has an established public facility development impact fee program (Code of Ordinances Chapters 32B and 32C) that requires new development to provide funds towards capital improvements for public services, including fire and emergency services. Under these regulations, future projects would be required to pay applicable developer impact fees in accordance with the City's requirements to ensure that facilities are funded, and new facilities are constructed as needed. General Plan CF Element Policy 3.1 sets the required response times that the Fire Department must meet. Fees would be used to ensure these standards are met. Therefore, the project would not result in the need for new facilities, or physical impacts due to new or expanded demand for fire facilities, and impacts would be less than significant.

2) Police protection?

Less than Significant Impact. Proposed project implementation would not result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities. Although the addition of residential units in the area would increase demand on police services, it would not result in the need for the construction of new or expanded facilities. The project site is within the existing service area served by the Oceanside Police Department, located approximately 2.4 miles from the project site. The Oceanside Police Department has an authorized budgeted strength of 219 sworn and 115 professional staff members and handles approximately 110,000 calls for service each year (City of Oceanside Police Department 2024). Based on existing resources, distance from the site, and the size of the development, it is reasonable to assume adequate coverage by existing police resources. Per LUE Policy 1.17.B, development review applications that are inconsistent with the capability of any public service agencies to provide cost-effective services shall not be approved. The City has an established public facility development impact fee program (Code of Ordinance Chapters 32B and 32C) that requires new development to provide funds towards capital improvements for public services, including police services. Therefore, as payment of these fees would be used to ensure City standards are met, the project would not result in physical impacts due to new or expanded demand for police services and impacts would be less than significant,

3) Schools?

Less than Significant Impact. Implementation of the proposed project would not result in the need for the construction of additional school facilities, nor does it propose new or expanded school facilities. Although the project proposes the replacement of an abandoned school site, the Oceanside Unified School District (OUSD) has not planned for the replacement of the school, as students have been consolidated to another local school (San Luis Rey Elementary) since 2019 (San Diego Union Tribune 2020). Future students generated by the project would be accommodated by the existing capacity of the OUSD. The project site lies within the Pablo Tac School of the Arts Elementary School, Lincoln Middle School, and Oceanside High School District boundaries. The current 2023/2024 enrollment is 456 students for Pablo Tac School of the Arts, 699 students for Lincoln Middle School, and 1,907 for Oceanside High School (Oceanside Unified School District [OUSD] 2023a, 2023b, 2023c). Per the OUSD Residential and Commercial/Industrial Development School Fee Justification Study, the OUSD school facilities in school year 2021/2022 have a capacity of 17,808 students, with an enrollment of approximately 16,082 students in the 2021/2022 school year (9,243 elementary school capacity, 3,465 middle school capacity, and 5,100 high school capacity). The OUSD facilities capacity exceeded student enrollment at the elementary school level while student enrollment exceeds facilities capacity at the middle school and high school levels in school year 2021/2022. As of 2023, the OUSD had a total enrollment of 16,261 (U.S. News and World Report 2024). Utilizing the student generation rates of the Fee Justification Study, the project would generate approximately 51 students³. Therefore, it is possible that the project would generate students that would further contribute to the exceedance of capacity at the middle school and high school levels. However, the OUSD is aware of this capacity exceedance through 2050 and is working towards procuring adequate capacity for future students. As the project would not be directly responsible for the exceedance of school capacity, the project does not directly result in the need for new or expanded school facilities.

To accommodate the students generated by the project, the applicant is required to pay developer fees to the OUSD per Resolution No. 36 (21-22), Government Code Section 65995, and Education Code Section 17620 for the continued maintenance and expansion of school facilities. The purpose of the fee is to pay for the construction, reconstruction/modernization and/or acquisition of new public -school facilities necessary to serve students expected to be generated from new residential and commercial/industrial development. Therefore, as payment of these fees would be used to ensure City standards for school enrollment are met, the project would not result in the need for new or expanded schools, or physical impacts from the construction of new or expanded schools and impacts would be less than significant.

³ (0.3606 student generation rate) * (140 units) = 50.48 total students

4) Parks?

Less than Significant Impact. Although implementation of the proposed project would increase the demand on existing public park facilities, the project would not result in the need to new or expanded facilities. As part of the project, each home would include private open space in the form of a balcony/deck. Common recreational amenities, consisting of approximately 34,496 sf of open space, would be designed with a variety of amenities such as active turf area to allow for a variety of activities, dog run, picnic table and seating areas, walkways, and informal lawn play area. Per the General Plan CF Element, the City shall strive to provide 5.0 acres of developed "Community Parks" per 1,000 residents within the City. The most recent household population estimates are 174,000 (American Census Bureau 2023a) and include an average household size of 2.65 residents in Oceanside (American Census Bureau 2023b). This existing population estimate requires approximately 870 acres of population-based parks. According to the City's Parks and Recreation Master Plan, the City has a current inventory of 642 acres of park land. This includes 269 acres of community parks and centers (including 2 acres of El Corazon), 74 acres of neighborhood parks, and two aquatic facilities (City of Oceanside 2019). It should be considered that parks, recreation facilities, and other services may also be used by the nearby residents of Vista and Carlsbad, Camp Pendleton Marine Corps Base, and unincorporated areas of San Diego County. Buildout of the project at 140 units would generate a population of 369 residents, utilizing the SANDAG Series 14 growth forecast methodology persons per household rate of 2.632 (SANDAG 2022), which would require 1.85 acres of population-based park area. As the project does not propose the construction or expansion of public parks, per City Code of Ordinance No. 91-09, the project would provide payment of public facility development impact fees to fund maintenance and expansion of public service facilities. Therefore, as payment of these fees would reduce cumulative impacts from project demand on park facilities, less than significant impacts in this regard would occur.

5) Other public facilities?

No Impact. The project would not generate a significant number of residents that would trigger the need for new or physically altered public facilities, including libraries. Per the City's General Plan CF Element Policy 0.7, the City shall require payment of capital improvement fees prior to issuance of a building permit based on the proportionate share of the costs of capital improvement needs represented by the proposed development. Community growth shall be managed in order that new residents who pay impact fees for new public facilities and services will benefit from those facilities and services within a reasonable period of time after paying the fees (General Plan CF Element Policy 0.4). Therefore, as payment of these fees would be used to ensure City standards are met, the project would not result in physical impacts due to new or expanded demand for libraries or other public service facilities and impacts would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.16 RECREATION. Would the project:				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.16 RECREATIONAnalysis:

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

Less than Significant Impact. Implementation of the proposed project would not generate substantial populations that would result in an increase in demand on existing public or private parks or other recreational facilities that would cause substantial physical deterioration of the facility. Buildout of the project at 140 units would generate a population of 369 residents, utilizing the SANDAG Series 14 growth forecast methodology persons per household rate of 2.632 (SANDAG 2022). The nearest parks to the project site are Buddy Todd Park (located 1.2 miles from the project site), El Corazon Park (located 2.2 miles from the project site), and Joseph Carrasco Park (located 2.2 miles from the project site). Although the residents generated by the project would utilize these three parks, in addition to recreational opportunities on-site, substantial physical deterioration would not occur to any one facility from the addition of 369 new users. In addition, the proposed on-site park would be accessible to the public. Per City Code of Ordinances Section 32D and General Plan CF Element Policy 0.4 and 0.7, the project would pay park impact fees that would contribute to the City's maintenance of and expansion of their recreation system. As such, payment of this fee would be used to ensure City standards are met, the project would not result in substantial deterioration of the existing park facilities, and impacts would be less than significant.

- b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

Less than Significant Impact. Implementation of the proposed project would not involve the construction or expansion of off-site recreational facilities or on-site active recreational areas or facilities. However, the project would provide open space areas on-site for passive recreation. Any impacts associated with the grading and construction of this area are analyzed and mitigated as necessary under each respective resource topic discussion. Therefore, there would be less than significant impacts on the environment from the construction or expansion of recreational facilities.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.17 TRANSPORTATION/TRAFFIC. Would the project:				
a. Conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.17 TRANSPORTATION/TRAFFIC

Analysis:

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

Less than Significant.

Roadway

As of July 1, 2020, public agencies are required to adhere to Senate Bill 743 which replaces the analysis of LOS with VMT for projects qualifying to meet documentational requirements under CEQA (City of Oceanside 2020). The City's TIAG provides a framework for transportation analysis based on the City's transportation policies and the adopted General Plan and includes the transportation analysis significance criteria, screening criteria, and thresholds of significance for environmental clearance for development projects. To assess whether the project would conflict with the City's transportation policies and the adopted General Plan Circulation Element, the City considers both VMT and LOS to be relevant and necessary measurements for transportation impacts. To conduct this analysis, project trips to be generated by the project were calculated as part of the Local Transportation Study (LTS; see Appendix E) prepared for the project. It is noted that a transportation impact in relation to LOS is considered a non-CEQA transportation impact based on the City's TIAG. However, for purposes of determining consistency with adopted General Plan Circulation Element to ensure the goals, objectives, and policies adopted by the City are supported and implemented while monitoring the capacity for the roadway networks. The City maintains its goals for achieving a LOS "C" on street segments with a corresponding LOS "D" at intersections during AM and PM peak periods in new, urbanized areas of Oceanside per General Plan CF Element Policy 12.3.

The City's TIAG provides the following thresholds to determine if the proposed project is required to provide improvements to study area facilities:

- Implementation of the proposed project triggers a roadway segment operating at acceptable LOS to operate at unacceptable LOS or increases the volume-to-capacity (V/C) ratio for a study roadway segment that is already operating at unacceptable LOS by more than 0.02.
- Implementation of the proposed project triggers an intersection operating at acceptable LOS to operate at unacceptable LOS or increases the average delay for a study intersection that is already operating at unacceptable LOS by more than 2.0 seconds.

As discussed in the LTS (see Appendix E), the proposed project is anticipated to generate a total of 973 daily trips, including 66 (16-in/50-out) trips during the AM peak hour and 81 (51-in/30-out) trips during the PM peak hour. Per the direction of City staff, trip generation rates were derived from the ITE's *Trip Generation Manual, 11th Edition*. Based on the project's trip generation, distribution, and assignment, as well as the City's TIAG study area requirements, the following facilities were included in the project study area:

- Roadway Segments
 - Garrison Street, between Project Driveway and Oceanside Boulevard
 - Oceanside Boulevard, between Foussat Road and Garrison Street
 - Oceanside Boulevard, between Garrison Street and El Camino Real
- Intersections
 - Garrison Street and Oceanside Boulevard (signal)
 - El Camino Real and Oceanside Boulevard (signal)
 - Garrison Street and project driveway (side-street stop-control)

The intersection of Garrison Street and Oceanside Boulevard currently operates at LOS B during both the AM and PM peak hours. However, the intersection of El Camino Real and Oceanside Boulevard currently operates at LOS E during both the AM and PM peak hours.

As detailed in the LTS under an Opening Year (2027) with Project Traffic Conditions scenario, the roadway segment of Garrison Street is projected to operate below capacity, whereas the roadway segment of Oceanside Boulevard is projected to operate at LOS F. Based on the roadway segment LOS results, implementation of the proposed project triggers the need for improvements under Opening Year (2027) with project conditions since the project increases the V/C ratio for roadways already operating at an unacceptable LOS. Implementation of the proposed project increases the V/C ratio for Oceanside Boulevard, between Garrison Street and El Camino Real, by 0.026. This exceeds the TIAG established threshold of 0.02 for roadway segments already operating at unacceptable LOS. Per General Plan CF Element Policy 12.5, developers are required to contribute to and correct off-site impacts for local streets, collectors, and arterials to ensure and maintain a smooth, functional, and safe circulation system.

All study intersections are projected to operate at acceptable LOS C or better under Opening Year (2027) with project conditions, with the exception of the intersection of El Camino Real and Oceanside Boulevard. This intersection is projected to operate at unacceptable LOS F and implementation of the proposed project does not increase the average delay by more than 2.0 seconds. Therefore, no study intersections are anticipated to degrade in LOS to unacceptable levels and no improvements would be required.

Therefore, impacts from conflicts with the policies of the adopted General Plan Circulation Element for the roadway segments would be less than significant.

Pedestrian

The draft General Plan Update Circulation Element (City of Oceanside 2024) established a system of three pedestrian route typologies to guide level of pedestrian amenities for mobility network streets: Connectors, Corridors, and Pedestrian Priority Zones. Per the LTS (see Appendix E), a preliminary review of the project site plan's proposed pedestrian facilities as compared to the existing pedestrian route typology designations within the project study area would not conflict with existing or planned pedestrian facilities and would not result in any impacts to pedestrian safety and accessibility. Per General Plan CF Element 12.8, the City encourages the comprehensive development of pedestrian sidewalks, pathways, and trails throughout the community. The project proposes crosswalks across Private Drive A, sidewalks within and circling the community, and walkways.

Bicycle

The LTS (see Appendix E) assessed whether the project would conflict with existing or planned bicycle facilities in the planning area. The LTS notes that there are existing Class II bicycle facilities along Oceanside Boulevard and El Camino Real and no bicycle facilities exist along Garrison Street. However, the proposed project would not propose new bicycle facilities, and the new proposed roadways would not impact any existing facilities in the study area. Therefore, the project would not conflict with existing or planned bicycle facilities and would not result in any impacts to bicyclist safety and accessibility.

Transit

As noted in the LTS (see Appendix E), the project site is within 0.5-mile walking distance of a transit line (Bus Route 318) serviced by North County Transit District. Bus Route 318 is serviced along Oceanside Boulevard in the eastbound/westbound direction within the project study area. The nearest bus stops are located along Oceanside Boulevard, both east and west of Garrison Street. The project would not impact access to this transit line or with the infrastructure of the existing stops. Therefore, the project would not conflict with existing or planned transit facilities and would not result in any impacts to transit facilities.

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

Less than Significant. Based on the SANDAG VMT screening maps, the proposed project is located in an area where the average VMT per capita is 16.0 miles or 84.3 percent of the regional average. Figure 10 displays the proposed project’s VMT per capita. Since the proposed project would generate less than 85 percent of the regional average VMT per capita, the proposed project would be deemed to have a less than significant VMT impact and no additional VMT analysis would be required.

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. No public roadways are proposed as part of the project, therefore, no impacts regarding design features or incompatible uses would occur. The project would design internal circulating drives consistent with City design standards for roadways and would connect the development to the existing Garrison Street. As recommended by the LTS prepared for the project (see Appendix E), appropriate signage to warn drivers of pedestrian foot traffic and speed cushions/bumps along internal roadways should be installed on internal roadways to calm traffic. Therefore, impacts from an increase in hazards due to a geometric design feature would or incompatible use would be less than significant.

d. *Result in inadequate emergency access?*

Less than Significant. Adequate emergency access would be provided during both short-term construction and long-term operation of the project. The project would construct private drives ranging from 24 feet to 28 feet wide to circulate the entirety of the community via private drives that would connect to Garrison Street. In addition, an emergency secondary access road would be constructed that provides ingress/egress to Private Drive “A” from Garrison Street. The project would be required to be reviewed by the Fire Department for adequate emergency access prior to project approval, per General Plan CF Element Policy 3.10. Therefore, impacts from inadequate emergency access would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.18 TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

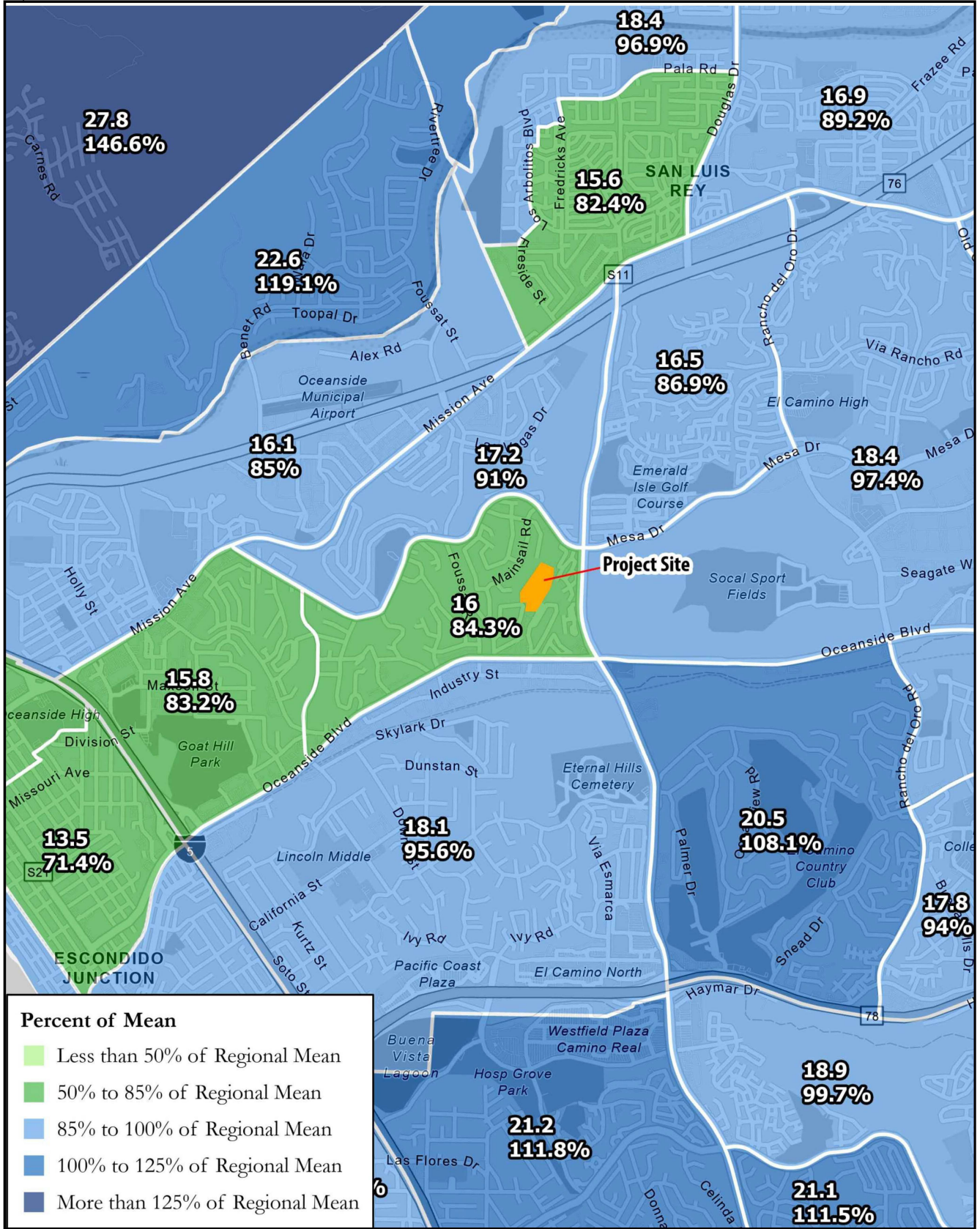


FIGURE 10
Project VMT Screening

14.18 TRIBAL CULTURAL RESOURCES

Analysis:

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

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

Potentially Significant unless Mitigated. Per the Archaeological Resources Survey Report (see Appendix I), a records search was requested from the SCIC to identify any previously recorded cultural resources located within a one-mile radius of the APE. The SCIC records search did not identify any cultural resources within the project APE. However, a search of the NAHC Sacred Lands File to identify spiritually significant and/or sacred sites or traditional use areas in the project vicinity returned a positive result. A field survey was completed with a Luiseño Native American representative from Saving Sacred Sites; no prehistoric or historic-era cultural resources were observed during the field survey of the project site. However, due to the possibility that undisturbed and unrecorded tribal cultural resources could be discovered during grading activities, impacts to tribal cultural resources from ground disturbance could be significant. As discussed under Issue 14.5(b), the Luiseño Native American representative from Saving Sacred Sites has requested cultural monitoring, post demolition, for all ground disturbing activities within the APE. RECON anticipates that the local consulting tribe(s) will likewise request construction monitoring during the AB 52 consultation with the City. Mitigation measures **CUL-1** through **CUL-8** would require archeological and tribal cultural resource protocols be put in place prior to and during ground disturbing activities. The mitigation measures provide details on actions to be taken should cultural resources be discovered including collection, investigation, and date recovery. Implementation of mitigation measure **CUL-1** through **CUL-8** would reduce potentially significant impacts to less than significant levels.

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

Potentially Significant unless Mitigated. As described above under 14.18(a), potential impacts to tribal cultural resources could occur as a result of grading and ground disturbing activities. Implementation of mitigation measure **CUL-1** would reduce potentially significant impacts to less than significant levels.

Mitigation Measure

See CUL-1 through CUL-8.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.19 UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of new or expanded, water or wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
b. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructures, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.19 UTILITIES AND SERVICE SYSTEMS

Analysis:

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

Less than Significant Impact. The nature and scope of the proposed project would not require or result in the construction of new or expanded water and wastewater, electric power, natural gas, or telecommunications facilities. To serve the proposed project, connections to existing infrastructure within Garrison Street would be required as detailed in the project description (see Figures 5 through 7). The project site is located within an urbanized area served by existing public services, utilities, and public facilities, which has been determined by the Water Systems Analysis and Sewer Systems Analysis to have adequate capacity to serve the project (see Appendices A and B).

All overhead utilities along the project frontage would be removed and undergrounded within Garrison Street. The impacts associated with this undergrounding would not result in significant environmental effects as the trenching required to complete this would be within the existing graded and paved road right of way. The wastewater treatment and stormwater drainage systems would be expanded on-site to include an underground storage facility and would be subject to the SWFMA to ensure ongoing maintenance. On-site runoff would be conveyed via the street curb and gutter system, captured by the proposed inlets, and then routed through the proposed storm drain system to the previously mentioned underground storage facility. As the expansion of the stormwater drainage system would be on-site, impacts associated with its construction are considered throughout this initial study in each corresponding analysis. All appropriate design features, policy and regulatory consistency, and mitigation measures have been applied to reduce impacts to less than significant associated with the construction of these facilities.

It is noted that significant caving and collapse have occurred in a centralized area within the asphalt pavement area near the existing playground on the project site due to a previous failure of an on-site storm drain, which led to the abandonment of the school site. This storm drain would be removed and replaced as part of the project. Therefore, environmental impacts associated with its removal and replacement have been assessed throughout this document under the various resource topics.

- b. *Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

Less than Significant Impact. Per the Water Systems Analysis prepared for the project, the projected average water demand from the project would be 26,560 gallons per day (see Appendix A). Water supply planning for the years 2025 to 2045 is addressed in the City's 2020 UWMP (City of Oceanside 2021a), which is a resource document that details long-term water supply and demand planning for the City's service area. The 2020 UWMP estimated the current (2020) population served by the City water service to be 177,531 and projected future population (2045) to be 184,657. Per this document, the City's total potable water demand is expected to decline, with multi-family residential dropping approximately 6 percent from base year conditions in 2045. The 2045 demand assumes passive and active conservation measures including water conservation, smart meters, and further implementation of non-potable recycled water conversions. Per the 2020 UWMP, the City's total water supply is expected to increase by approximately 4 percent by 2045 as compared to the base year. Although this project would increase residential land uses compared to the model used to develop the 2020 UWMP, increased growth is forecasted and anticipated supplies would be available to serve the project. Additionally, the City is in the process of updating their General Plan to account for higher growth projections, which would be included in updated population projections in the next UWMP anticipated in 2025. Furthermore, future development would be required to adhere to all state and local regulations relating to conservation and water efficiency measures, including development standards in Chapter 37 of the Code of Ordinances for residential projects relating to water conservation. Specific project water conservation measures include: all open space areas shall be landscaped in accordance with the City's Water Conservation Master Plan, the installation of low-flow showerheads, toilets, and faucets, and use of energy star appliances. Thus, no new or expanded entitlements would be required to serve the project with its implementation. Therefore, impacts from insufficient water supplies would be less than significant.

- c. *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less than Significant Impact. Per the Sewer Systems Analysis prepared for the project, the projected average sewage generated from the project would be 19,600 gallons per day (see Appendix B). The project would construct a private gravity collection system on-site that would allow flow to a new sewer manhole in Garrison Street, which would connect to the existing gravity sewer line adjacent to the project site. This existing 8-inch diameter line in Garrison Street at the eastern boundary of the project would be utilized by the project and would convey flow southward and ultimately connect to the trunk sewer line at Oceanside Boulevard near Industry Street. The Sewer Systems Analysis (see Appendix B) concluded that there would be adequate capacity to serve the project and therefore, there is no need for the expansion of the wastewater system. Impacts related to inadequate capacity to serve the project would be less than significant.

- d. *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructures, or otherwise impair the attainment of solid waste reduction goals?*

Less than Significant Impact. The demolition and removal of existing improvements (approximately 60,000 square feet) would generate a temporary increase in solid waste to local landfills. However, this increase would not be significant in the context of the remaining capacity of the City's utilized landfills. Per the City's Healthy and Livable Communities Element, in 2019, the most recent year data available, about 95 percent of Oceanside's waste went to Otay Landfill in Chula Vista, about 3 percent went to the El Sobrante Landfill in Corona, about 2 percent went to Sycamore Landfill in San Diego, and a small amount went to a handful of other facilities in Southern California. According to Cal-Recycle, the Otay Landfill has a remaining capacity of about 21 million cubic yards and is expected to remain in operation until 2030. The El Sobrante Landfill has a remaining capacity of about 143 million cubic yards, and it is expected to remain

in operation until 2051. The Sycamore Landfill has a remaining capacity of 113 million cubic yards and is expected to remain in operation until 2042.

As a residential development, operational activities would result in only a nominal amount of solid waste. See discussion under (e) below for specifics regarding solid waste reduction goals.

e. *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less than Significant Impact. The project is required to comply with applicable regulations related to recycling including the Code of Ordinances Chapter 13, in addition to requirements for the recycling of construction and demolition debris specified in state and local regulations. The City’s 2020 Zero Waste Plan also calls for the diversion of waste by 75 to 90 percent by 2030 (City of Oceanside 2021b). The City has adopted the latest version of CALGreen and requires waste diversion of C&D materials from new construction, commercial renovation, and most residential additions/alterations. The project would be required to submit a Waste Management Plan before permits are issued and construction begins to ensure compliance (City of Oceanside 2024). Additionally, the project would be consistent with HLC Policy 7-149, which supports the continued update and implementation of the City’s 2020 Zero Waste Plan, requiring recycling of organic materials including food scraps. In 2020, Waste Management of North County launched a food scraps recycling program for commercial and multi-family customers in accordance with AB 1826 and SB 1383. Food scraps recycling for residential customers is available through the yard waste bin and would be provided for the project residents.

Through mandatory compliance with regulations related to solid waste and implementation of adopted General Plan policies, the project would assist the City in achieving its solid waste generation reduction goals and increase recycling efforts, to help the City meet its solid waste management goals. Impacts would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.20 WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zone, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.20 WILDFIRE

Analysis:

a. *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

Less than Significant Impact. As noted under Issue 14.9 Hazards and Hazardous Materials (f), the project site is not located in a designated VHFHSZ nor in a WUI area, as shown in the CalFire Fire Hazard Severity Zone Map (CalFire 2024). Therefore, analysis under these threshold questions would not be required as the project site is not located in or near state responsibility areas or lands classified as VHFHSZ. There would be no impact related to substantial impairment of an adopted emergency response plan or emergency evacuation plan.

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

Less than Significant Impact. See response (a).

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

Less than Significant Impact. See response (a).

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 Impact. See response (a).

	Potentially Significant Impact	Potentially Significant Unless Mit.	Less than Significant Impact	No Impact
14.21 MANDATORY FINDINGS OF SIGNIFICANCE. Would the project:				
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 decrease below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts which are individually limited, but cumulatively considerable ("Cumulatively considerable" means the project's incremental effects are considerable when compared to the past, present, and future effects of other projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will have substantial adverse effects on human beings, directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

Less than Significant Impact with Mitigation Incorporated. Implementation of the project has the potential to result in significant impacts to biological resources, cultural resources, paleontological resources, and tribal cultural resources as discussed in Sections 14.4, 14.5, 14.7, and 14.18, respectively. Given the implementation of the recommended mitigation measures, potential impacts to all resources would be mitigated to a less than significant level. Therefore, the project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory, and impacts would be less than significant.

As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

- b. *Does the project have impacts which are individually limited, but cumulatively considerable ("Cumulatively considerable" means the project's incremental effects are considerable when compared to the past, present, and future effects of other projects)?*

Less than Significant Impact with Mitigation Incorporated. As described in Section 14.3 Air Quality, impacts related to air quality would be less than significant. Air quality is a regional issue and the cumulative study area for air quality impacts encompasses the SDAB as a whole. Therefore, the cumulative analysis addresses regional air quality plans and policies, such as the RAQS, as well as the project's contribution to a net increase of any criteria pollutant for which the SDAB is listed as a non-attainment area. As described under threshold (b), the project would not result in construction or operational emissions in excess of the applicable significance thresholds for all criteria pollutants. Consequently, the project would not result in an increase in emissions that are not already accounted for in the RAQS, and cumulative impacts would be less than significant. The analysis of GHG emissions in Section 14.8 is a cumulative analysis by nature as the issue of GHG emissions is a global issue. As detailed therein, the project would not contribute to a cumulatively considerable impact to the global cumulative GHG emissions impact. No cumulative impact would result related to issues of geology and soils, hazards and hazardous materials, or hydrology and water quality because like the project, each individual project would be subject to local and State regulations that ensure impacts related to these issues are avoided.

Cumulative impacts require consideration of development that may be occurring in the localized area to determine whether the project, in combination with other development, would significantly contribute to a cumulative impact. Past, present, and reasonably future projects were researched to identify projects that could contribute to a potentially significant cumulative impact. Table 15 includes several large-scale nearby developments, as identified by the LTS (see Appendix E). Figure 11 identifies the location of each of these projects in relation to the study intersections of the LTS, as identified in the LTS (see Appendix E). It is recognized that since preparation of the project's LTS several identified cumulative projects are beyond the statuses (i.e., from approved to constructed) identified in Table 15. However, the cumulative analysis is based on when the traffic counts were conducted, which is what is reflected in Table 15. The analysis is required to maintain the statuses, so all trips are adequately captured and assessed. It is reasonable to consider that these projects have already been accounted for in the RAQS through anticipated regional growth projections and would be subject to similar mitigation or City Conditions of Approval for the protection of resources. Therefore, the project's contribution to a potential cumulative impact would be less than significant and the project has been determined not to meet this Mandatory Findings of Significance.

As described in this Initial Study, all impacts would be mitigated to a level less than significant. Air quality is a regional issue and the cumulative study area for air quality impacts encompasses the SDAB as a whole. Therefore, the cumulative analysis addresses regional air quality plans and policies, such as the RAQS, as well as the project's contribution to a net increase of any criteria pollutant for which the SDAB is listed as a non-attainment area.

Table 15 Cumulative Projects			
Name	Land Use	Density/Size	Status
Coastal Academy	Charter School	1,500 Students	Built ¹
Ocean Creek	Multi-family Residential	295 du	Under Construction
El Corazon ²	Mixed Use	268 du 9.1-acre Hotel 43.8 KSF Commercial/Retail 15.1 KSF Warehouse 350.45 KSF R&D 5.5 KSF Civic Services 97.75 KSF Office 99 Acres Active Park 99 Acres Passive Park	Various
Avocado Road	Single-family Residential	19 du	Built ¹
Vista Bella	Mixed Use	73 du/4 live-work units/3.7 KSF Commercial/Retail	Approved
Ocean Pointe	Multi-family Residential	142 du	Under Construction
Grandview Pointe	Single-family Residential	28 du	Built ¹
Oceanside East Shopping Center	Commercial/Retail	Gas Station 1 Automatic Car Wash 2.5 KSF Fast-Food with Drive-through 2.32 KSF Sit-down Restaurant 3.48 KSF Commercial/Retail 4.5 KSF Tire Store	Partially Built
Ocean Kamp	Mixed Use	300 Hotel Rooms 700 du 126 KSF Commercial/Retail 1 Surf Lagoon/Resort	Under Construction
Barnwell Estates	Single-family Residential	7 du	Approved
Loma Alta Terraces	Single-family Residential	13 du	Approved

Source: Table 5.1 (Appendix E)

du = dwelling units; KSF = thousand square feet; R&D = research and development; sf = square feet

¹This project was recently completed. However, its associated traffic is included under cumulative conditions since it is not reflected under existing conditions.

²El Corazon is a multi-phase development. El Corazon represents the components of the project remaining to be constructed. Frontwave Arena is built and operational. Residential is constructed but left in the cumulative projects list as it was not occupied at the time of traffic counts .

- c. *Does the project have environmental effects which will have substantial adverse effects on human beings, directly or indirectly?*

Less than Significant Impact. The project would not have a significant impact related to any issue areas that could result in adverse effects to human beings either directly or indirectly. Impacts related to aesthetics, air quality, noise, geology and soils (excluding paleontological, which is covered above under threshold [a]), hazards and hazardous materials, or hydrology and water quality would be less than significant because the project would comply with local and state regulations that ensure impacts related to these issues are avoided. Compliance with fire codes ensures impacts related to wildfire would be avoided. Therefore, the project would not cause substantial adverse effects on human beings, either directly or indirectly, and the project has been determined not to meet this Mandatory Findings of Significance.

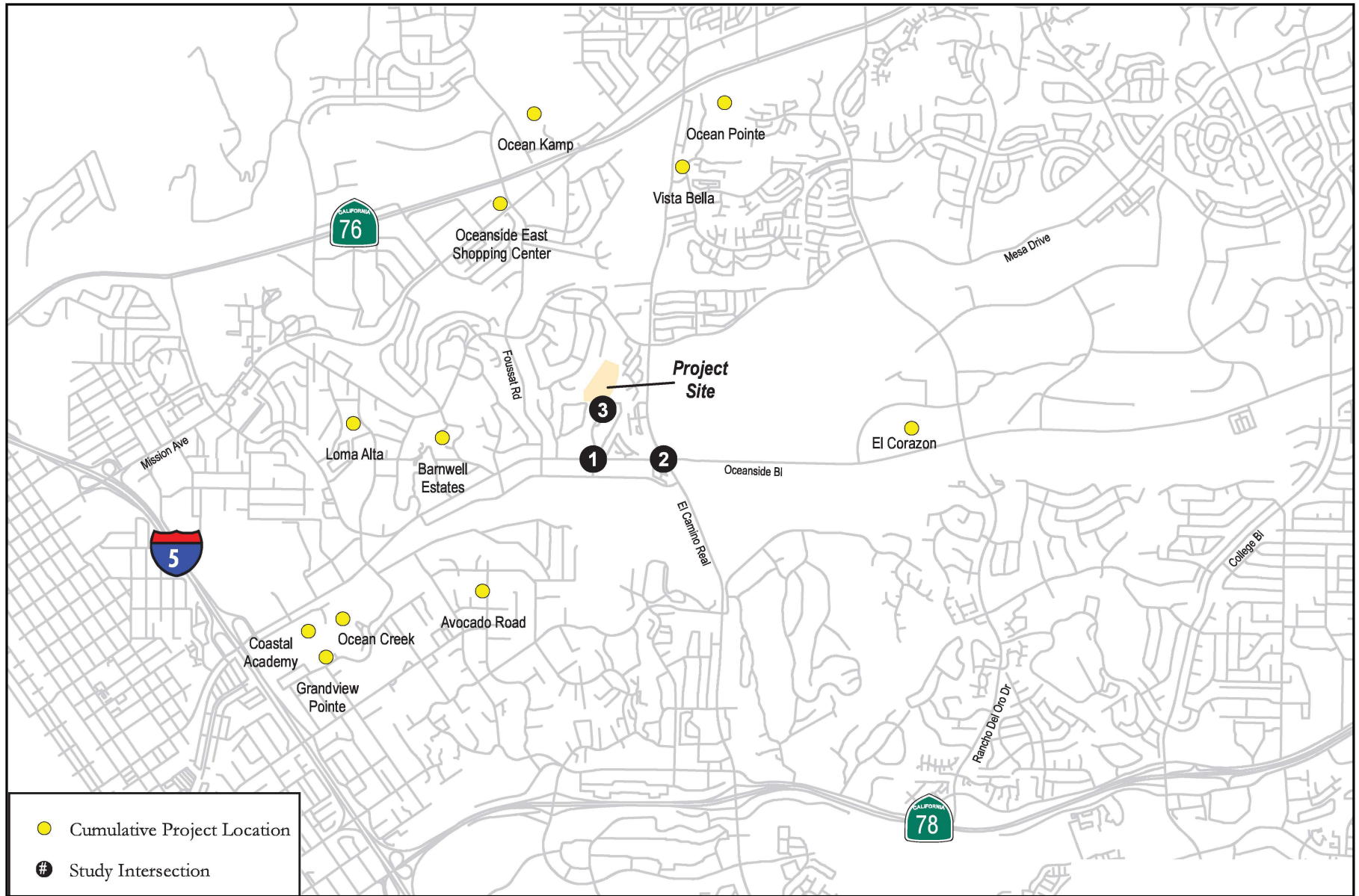


FIGURE 11
Cumulative Projects

15. **PREPARATION.** The initial study for the subject project was prepared by:



Signature

Preparer's Name: Lori Spar

Agency's / Consulting Firm's Name: RECON Environmental, Inc.

16. **PROPERTY OWNER/APPLICANT CONCURRENCE:** Section 15070(b)(1) of the California Environmental Quality Act (CEQA) Guidelines provides that Lead Agencies may issue a Mitigated Negative Declaration where *the initial study identifies potentially significant effects, but, revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.* The property owner/applicant signifies by their signature below their concurrence with all mitigation measures contained within this environmental document. However, the applicant's concurrence with the Draft Mitigated Negative Declaration is not intended to restrict the legal rights of the applicant to seek potential revisions to the mitigation measures during the public review process.



Signature

Property owner's / Applicant's Name: Michael Torres, TTLC Oceanside Garrison, LLC

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