



CITY OF SAN MARCOS
Mitigated Negative Declaration
ND# 10-798

DATE: May 16, 2011
APPLICANT: AT&T Mobility, LLC.

1. PROJECT CASE NUMBER(S) / TITLE:

SP 92-27(09M) & CUP 09-814 / AT&T Wireless Telecommunication Facility

2. LEAD AGENCY NAME AND ADDRESS:

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

3. CONTACT PERSON AND PHONE NUMBER:

Sean del Solar, Assistant Planner, 760-744-1050, extension 3223, sdelsolar@san-marcos.net

4. PROJECT LOCATION:

842 Nordahl Road, San Marcos CA, 92069
APN: 228-120-46

5. PROJECT SPONSOR'S NAME AND ADDRESS:

AT&T Mobility, LLC.
5738 Pacific Center Drive
San Diego, CA 92121

6. GENERAL PLAN DESIGNATION:

Commercial, Richland Neighborhood

7. ZONING:

"SPA" Specific Plan Area (Richland Hills North Specific Plan)

8. DESCRIPTION OF PROJECT:

The proposed project consists of a request to modify the Richland Hills North Specific Plan to include a provision in the permitted land uses to allow for one (1) disguised wireless telecommunication facility upon issuance of a conditional use permit. The project also proposes a conditional use permit to install and operate a thirty-five (35) foot tall monopole with twelve (12) panel antennas disguised as a broadleaf tree, a 355 square foot (28' x 12'-8") open roof equipment enclosure with an eight (8) foot high split face concrete masonry unit (CMU) wall and the installation of landscaping. The project will also include trenching for underground conduit from the proposed facility to the existing utilities near Nordahl Road and minor grading activities (less than fifty (50) cubic yards) to create a pad for the equipment enclosure and an unpaved access road from the existing parking lot to the wireless telecommunication facility. The project will also include the removal of existing metal poles and nets throughout the project site, which exist from a previous use of the site that has ceased.

9. SURROUNDING LAND USES AND SETTING:

The project site is located in the northeast portion of the city, in an urbanized area as defined in § 21071(a)(2) of the Public Resources Code. The project site can be seen in Image 1, and is bounded on the west by Nordahl Road, to the north and east by Pine Heights Way, and to the south by Montiel Road. The project site was originally developed in 1997 as a PAR-3 golf course consisting of an approximately 3,027 square foot main building, parking lot facilities and graded/landscaped grounds, however the project site is currently used as a church under CUP 06-706 (the church would continue to operate and is not a part of this application). Immediately adjacent to the subject property and to the south is an approximately 56,000 square foot three (3) story Class A medical office building. West of the project site, across Nordahl Road are apartment homes, condominiums and a commercial center. To the north and east of the project site is a patchwork of City and County area with rural residential homes and rolling terrain.

10. OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED (e.g. PERMITS, FINANCING APPROVAL OR PARTICIPATION AGREEMENT):

None.

Image 1

Aerial Image of Site



Proposed location* for equipment enclosure

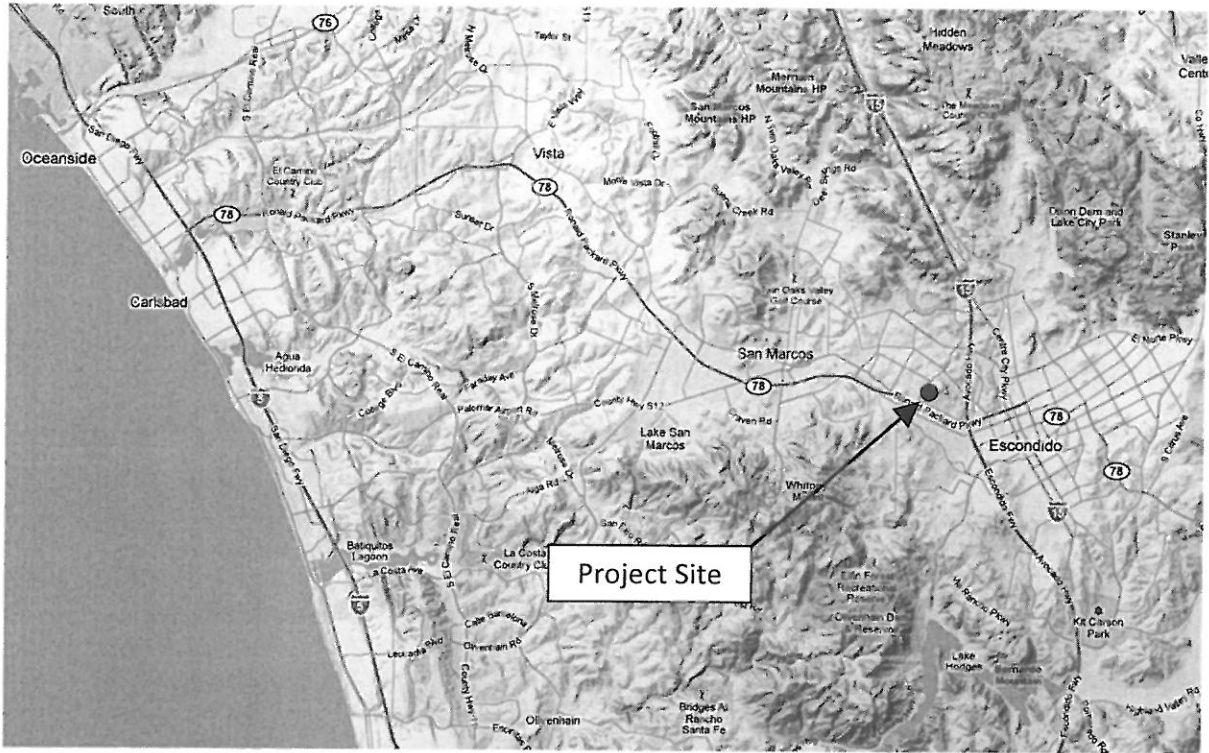


Proposed location* for faux tree antenna

**Locations are approximate on aerial image. For specific locations of equipment, see project plans.*

Image 2

Regional Map



Site Photos



Image 3

View of main building from southeast corner of the existing parking lot.



Image 4

View of the main entrance to the subject site from Nordahl Road.

Site Photos (continued)



Image 5

View of the proposed project site from the northwest corner of the existing parking lot.



Image 6

View of the proposed location of the faux tree antenna.

Site Photos (continued)



Image 7

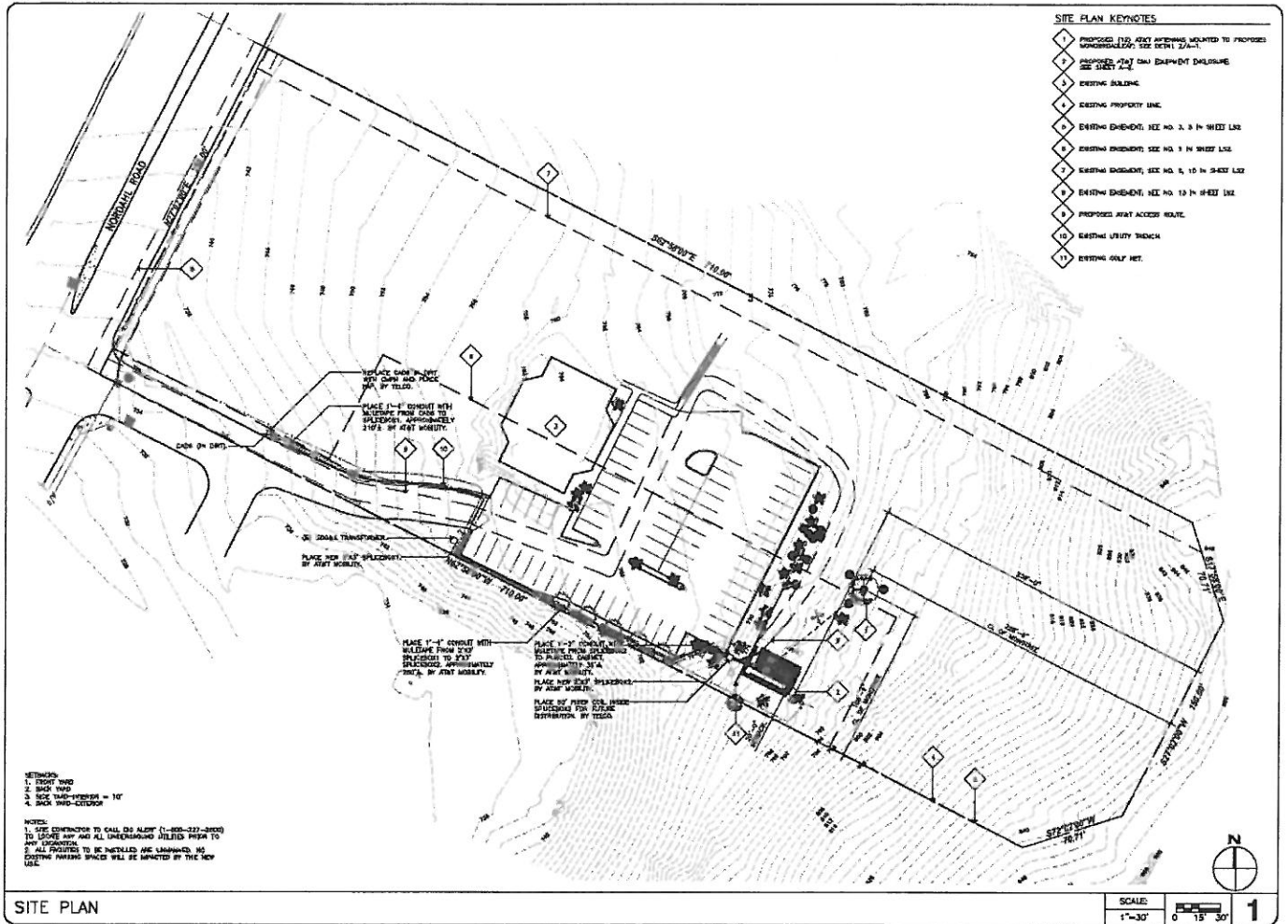
View of the proposed location of the equipment enclosure.



Image 8

View of the proposed equipment enclosure location from the parking lot of the Class "A" medical office building at 838 Nordahl Road.

Project Plans



[illegible][illegible]

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

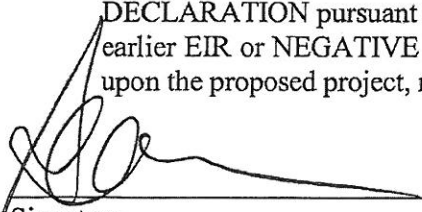
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant Impact with Mitigation Incorporated" as indicated by the checklist on the following pages:

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

DETERMINATION:

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because of the incorporation of mitigation measures and/or revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


Signature

5/16/2011
Date

Sean del Solar, Assistant Planner
Printed Name

INITIAL STUDY ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS -- <i>Would the project:</i>				
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 buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION:

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

Less Than Significant Impact

The subject site was previously developed as a PAR 3 golf course but now operates as a church. The property is situated at the foot of a hillside that gains altitude easterly. At the west end of the property at Nordahl Road, the property is at an approximate elevation of 734 feet above mean sea level (AMSL), and at the rear in the east, the property is at an elevation of 848 feet AMSL. The project proposes the installation of a 35 foot tall disguised monopole and an approximately 355 square foot equipment enclosure. The monopole would be located at a site with an approximate elevation of 787 feet AMSL. The proposed equipment enclosure would be located approximately 90 feet south, southwest of the monopole and at an approximate elevation of 780 feet AMSL. The hillside has a peak at approximately 950 feet AMSL east, northeast of the project site and a ridge (at 870 to 860 feet AMSL) that tapers downward south of the peak running along the east side of the project site. The top of the proposed 35' disguised monopole at 787 feet AMSL would be approximately 38 feet below the ridgeline. In addition to being below the ridgeline, the proposed facility has been designed to be disguised as a broadleaf tree to emulate surrounding vegetation and further camouflage the facility. The equipment enclosure is proposed to be located approximately 90 feet away from the monopole to further enhance the camouflaging by removing the presence of any synthetic shapes near the monopole. As a result, the project is not expected to have a significant impact to a scenic vista.

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

No Impact

As stated previously, the project proposes the installation of a 35' disguised monopole and equipment enclosure at an already developed site. The nearest state highway is State Route 78 (approximately 1,600 feet south of the project site), which is not currently designated as a state scenic highway. Additionally, Interstate 15, which is located approximately 6,600 feet east of the project site, is also not currently designated as a state scenic highway. As a result, the project is not expected to have an impact to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway and no mitigation measures are required.

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

Less Than Significant with Mitigation Incorporated

As discussed previously, the project proposes to install a 35' monopole and support equipment enclosure at the site. To mitigate potential visual quality impacts resulting from the project, the monopole has been designed to incorporate natural elements to emulate a broadleaf tree and the equipment enclosure will be located 90 feet away from the monopole and utilize building materials and landscaping to further conceal its presence. In addition, existing poles and nets from the property that were remaining from the prior PAR 3 golf course that is no longer operating at the project site shall be removed from the site to further enhance camouflaging the proposed project. As a result of the incorporation of these mitigation measures, the project is not expected to substantially degrade the existing visual character or quality of the site and its surroundings.

MM 1.1 - Monopole shall be disguised as a broadleaf tree with sufficient branches, leaves and full enough synthetic canopy to completely conceal all antenna panels and electronic appurtenances from public view.

MM 1.2 - The supporting equipment shall also be placed 90 feet away from the proposed tower and further concealed using materials compatible with the site and surrounded by landscaping harmonious to that of the color and type of existing landscaping at the site.

MM 1.3 - Applicant shall remove existing metal poles and netting from the site.

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

No Impact

The disguised monopole will not contain any lights and service lighting located within the equipment enclosure will be below the top of the wall and only utilized during service intervals by a technician. The proposed materials of all structures will not produce a glare and sufficient setbacks exist from all surrounding properties that shadows shall be contained on site. In addition, section 20.56.040 of the S.M.M.C. requires that all outdoor lighting be shielded and directed onto the site and City policy requires

low pressure sodium lighting be used in order to preserve important dark sky resources such as Palomar Mountain and Mount Laguna. As a result, the project is not expected to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area and no mitigation measures are required.

MITIGATION MEASURES:

- MM 1.1 - Monopole shall be disguised as a broadleaf tree with sufficient branches, leaves and full enough synthetic canopy to completely conceal all antenna panels and electronic appurtenances from public view.
- MM 1.2 - The supporting equipment shall also be placed 90 feet away from the proposed tower and further concealed using materials compatible with the site and surrounded by landscaping harmonious to that of the color and type of existing landscaping at the site.
- MM 1.3 - Applicant shall remove existing metal poles and netting from the site.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
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II. AGRICULTURE AND FOREST RESOURCES -- In

determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) 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:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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? | <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"/> |

DISCUSSION:

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

No Impact

The project site is located on a previously developed parcel. According to the 2006 San Diego County Important Farmland Map prepared by the California Farmland Mapping and Monitoring Program, the site is not classified as Prime Farmland, Unique Farmland or Farmland of Statewide Importance by the Farmland Mapping and Monitoring Program of the California Resources Agency. As a result, no impacts are anticipated and no mitigation measures are required.

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

No Impact

The proposed project will not conflict with existing zoning for an agricultural use, or a Williamson Act contract. The site is not zoned agricultural and no agricultural land uses occur on the subject property. As a result, no impacts are anticipated and no mitigation measures are required.

- 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

The project site is located on a previously developed parcel. The project is not zoned for 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)). As a result, no impacts are anticipated and no mitigation measures are required.

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

No Impact

Since the project site is developed and contains no forest land as defined in Public Resources Code section 12220(g), no loss or conversion of forest land will occur if the project is approved. As a result, no impacts are anticipated and no mitigation measures are required.

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

No Impact

The project proposes to install a 35' disguised monopole and supporting telecommunication equipment enclosure at the site. As discussed previously, the project site is not located in agricultural zone or forestlands as defined in Public Resources Code section 12220(g) nor would the project involve other changes to the environment that would convert land to non-agricultural or non-forest uses. As a result, no impacts are anticipated and no mitigation measures are required.

MITIGATION MEASURES:

None.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
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III . AIR QUALITY -- *Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:*

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

DISCUSSION:

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

No Impact

The project site is located in the San Diego Air Basin (SDAB) which is a federal and state non-attainment area for ozone (O3). The SDAB was designated in attainment for all other criteria pollutants, with the exception of particulate matter less than or equal to 10 microns in diameter (PM10) which was determined to be unclassifiable under federal standards and a non-attainment pollutant for state standards. The periodic violations of National Ambient Air Quality Standards (NAAQS) in the San Diego Air Basin, particularly for ozone in inland foothill areas, requires that a plan be developed outlining the pollution controls that will be undertaken to improve air quality. In San Diego County, this attainment planning process is embodied in the San Diego Regional Air Quality Strategies (RAQS) developed jointly by the San Diego Air Pollution Control District (SDAPCD) and the San Diego Association of Governments (SANDAG).

The RAQS was initially adopted in 1991, and is updated on a triennial basis; most recently in 2009. The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for O3. The SDAPCD has also developed the air basin's input to the State Implementation Plan (SIP), which is required under the Federal Clean Air Act for areas that are in nonattainment of air quality standards. The SIP includes the APCD's plans and control measures for attaining the O3 NAAQS and is also updated on a triennial basis.

The proposed project relates to the SIP and/or RAQS through the land use and growth assumptions that are incorporated into the air quality planning document. These growth assumptions are based on each City's and the County's General Plans. Since the proposed project is consistent with the City of San Marcos' General Plan, the project has been anticipated with the regional air quality planning process; and therefore the project would be consistent with the applicable air quality plan (RAQS). As a result, the project is not expected to conflict with or obstruct implementation of the San Diego Regional Air Quality Strategies (RAQS).

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

Potentially Significant Unless Mitigated

The construction phase of the proposed project will produce VOC, NOx, CO, SOx, PM10 and PM2.5 emissions. These emissions will be the result of the use of diesel powered construction equipment, the use of building materials such as cement and the movement of dirt/soil during trenching and grading activities.

The operation of the unmanned facility is not expected to create any emissions effecting air quality other than those resulting from the once to twice monthly vehicle trips required for maintenance intervals from a technician. Implementation of a fugitive dust control plan during construction and demolition activities will contain the release of particulate matter into the air and protect air quality. The impacts anticipated by the limited construction activities with the incorporation of the mitigation measures discussed above and the small number of vehicle trips anticipated to be generated by the project will be far below the thresholds of significance and are not expect to violate any air quality standard or contribute substantially to an existing or projected air quality violation.

MM 3.1 - The project shall implement a fugitive dust emissions control plan during construction. This plan shall include the watering of the site for dust control; isolating excavated soil until it is removed from the site; and periodic cleaning of parking lot, driveway and/or street to remove accumulated materials.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact

During the construction phase, the proposed project will contribute toward a cumulative net increase of criteria pollutants for which the San Diego Air Basin (SDAB) is a non-attainment area under an applicable air quality standard (including releasing emissions of ozone). However, because the facility will be unmanned and the proposed landscaping will require minimal ongoing maintenance, the project is not expected to make a significant contribution of criteria pollutants from the ongoing operation of the site.

Furthermore, all of Southern California is within a non-attainment region for these criteria pollutants (ozone and particulate matter). Consequently, the project will probably result in an insignificant incremental increase that is not expected to significantly contribute to the nonattainment status of the region. As a result, and pursuant to CEQA Guidelines Section 15064(h), these impacts are considered less than significant and no mitigation measures are required.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact

Sensitive receptors to substantial pollutant concentrations are population groups which are more susceptible to air pollution and include young children, the elderly and the acutely and chronically ill (especially those with cardio-respiratory disease). The nearest school to the project site is Knob Hill Elementary School, which is approximately 0.25 Northwest of the project site. Also nearby the project site are two senior housing facilities: Casa Vallecitos and Hacienda Vallecitos, both of which are approximately 0.25 miles west of the project site. Additionally, immediately adjacent to the project site, to the south is a Class "A" medical office building (with no overnight patient care). Lastly, the project site is surrounded on the north and east sides with residential areas, which have the potential to include populations of sensitive receptors. Nonetheless, the project is anticipated to operate well below emission thresholds considered significant and given the limited scope of the construction and incorporation of mitigation measures, impacts to sensitive receptors from the project are anticipated to be minimal. As a result, the project is not expected to significantly expose sensitive receptors to substantial pollutant concentrations and no mitigation measures are required.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact

As previously discussed, the project does propose a minimal construction period and operation of an unmanned disguised telecommunication facility. Given the scope of the project, it is not anticipated that objectionable odors will be generated. As a result, the project is not expected to create objectionable odors that will affect a substantial number of people and no mitigation measures are required.

MITIGATION MEASURES:

- MM 3.1 - The project shall implement a fugitive dust emissions control plan during construction. This plan shall include the watering of the site for dust control; isolating excavated soil until it is removed from the site; and periodic cleaning of parking lot, driveway and/or street to remove accumulated materials.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
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IV. BIOLOGICAL RESOURCES -- Would *the project*:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION:

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

No Impact

The subject property is partially disturbed and occupied by buildings, paved parking surfaces and ornamental landscaping which contains no natural biological habitat. The project proposes the installation of a wireless telecommunication facility in a disturbed portion of the site, a former fairway of the PAR 3 golf course which previously operated at the property. A biological report created in 1991 for the Richland Hills North Specific Plan recommended preserving the rear 0.86 acres of the lot for habitat conservation. The project will avoid this conservation area and will be limited to the disturbed portion of the property. As a result, no impacts are anticipated that would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service and no mitigation measures are required.

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

No Impact

There are no naturally occurring springs, permanent aquatic habitats or natural drainages on the project site. The project site is highly disturbed and partially built out with urban development and the surrounding area is either built out, highly disturbed or rural in nature. As a result, no impacts are anticipated that would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service and no mitigation measures are required.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact

As discussed in preceding responses, the project area is developed and does not contain any riparian habitat or other sensitive natural communities such as wetlands, marshes, or vernal pools, therefore, no impacts would occur to such habitats and no mitigation measures are required.

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

No Impact

The project site is surrounded by urban and rural development and is not considered a part of an identified wildlife corridor. Therefore, development of the proposed project would not interfere with the movement of any native resident wildlife species, or migratory wildlife corridors and no mitigation measures are required.

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

No Impact

As stated previously, the project site contains no sensitive biological resources and there are no such local policies or ordinances related to biological resources affecting the site. As a result, the project would not conflict with any local policies or ordinances and no mitigation measures are required.

- f) **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

No Impact

The project site is not located within an adopted conservation or preservation plan areas identified in the City's Draft Subarea Plan of the San Diego County Multiple Habitat Conservation Plan. Additionally, the project would not conflict with the provisions of any other adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As a result, no impacts are anticipated from the project that would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan and no mitigation measures are required.

MITIGATION MEASURES:

None.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
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V. CULTURAL RESOURCES -- Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic features? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

No Impact

A review of the National Register of Historic Places (<http://www.nationalregisterofhistoricplaces.com>), California Historic Landmarks (www.ohp.parks.ca.gov), and CERES State Historic Landmarks of San Diego County (www.ceres.ca.gov) indicate there are no historic resources within or adjacent to the project site. As a result, no impacts are anticipated that would cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 and no mitigation measures are required.

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

Potentially Significant Unless Mitigated

An archaeological survey of the project site was conducted in August of 1991 when the project site originally developed. The survey was prepared by Gallegos and Associates (included as Appendix "A") and did not identify any prehistoric or significant historic sites within the area of the project. Additionally, in 1997, when the initial development of the site occurred, no archaeological resources were recovered. Intrusions into the subsurface from the project will occur during construction and will primarily consist of trenching activities for extending underground utilities, the installation of irrigation lines and foundations of the monopole and equipment enclosure. The areas of the site where project related construction

activities are to occur are highly disturbed from the previous development of the site and make the likelihood of encountering archaeological resources at the project site very low. Nonetheless, if resources are encountered at the site, all work in the area shall cease until a qualified archaeologist is summoned to the site and able to evaluate the discovery and allow construction to be resumed. As a result of the incorporation of this mitigation measure, impacts are anticipated to be less than significant and will not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

MM 5.1 - Should archaeological resources be discovered during the project construction activities, all work in that area shall be halted, the City of San Marcos Building Official shall be notified and a qualified archaeologist shall be summoned to the site to evaluate the find. Should the resource be determined significant, a recovery and catalog program shall be implemented.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic features?

Potentially Significant Unless Mitigated

Paleontological resources are not known to be present at the project site. The likelihood of encountering archaeological resources at the project site is very low because intrusions into the subsurface from project related construction activities are limited and the project area is highly disturbed from previous development. Nonetheless, if resources are encountered at the site, all work in the area shall cease until a qualified archaeologist is summoned to the site and able to evaluate the discovery and allow construction to be resumed. As a result of the incorporation of mitigation measures, impacts are anticipated to be less than significant and won't destroy a unique paleontological resource or site. Additionally, the project site is limited to an already graded portion of the property with no unique geologic features. As a result, no mitigation measures are required and no impacts are required to prevent the destruction of a unique geologic feature.

MM 5.2 - Should artifacts or items of potential paleontological significance be discovered during the project construction activities, all work in that area shall be halted, the City of San Marcos Building Official shall be notified and a qualified paleontologist shall be summoned to the site to evaluate the find. Should the resource be determined significant, a recovery and catalog program shall be implemented.

d) Disturb any human remains, including those interred outside of formal cemeteries?

No Impact

There are no known human remains within the project site or vicinity. As previously discussed, intrusions into the subsurface from the project are expected to be limited and because the project area is highly disturbed from previous development, the likelihood of encountering human remains at the project site is very low. Notwithstanding this fact and as a standard construction practice, if any human remains are encountered during project related activities, the State Health and Safety Code Section 7050.5 states that no further disturbance shall occur in the immediate area until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. As a result of the project's adherence with the State Health and Safety and Public Resources Codes, there are no impacts anticipated from the project that would disturb any human remains and no mitigation measures are required.

MITIGATION MEASURES:

- MM 5.1 - Should archaeological resources be discovered during the project construction activities, all work in that area shall be halted, the City of San Marcos Building Official shall be notified and a qualified archaeologist shall be summoned to the site to evaluate the find. Should the resource be determined significant, a recovery and catalog program shall be implemented.
- MM 5.2 - Should artifacts or items of potential paleontological significance be discovered during the project construction activities, all work in that area shall be halted, the City of San Marcos Building Official shall be notified and a qualified paleontologist shall be summoned to the site to evaluate the find. Should the resource be determined significant, a recovery and catalog program shall be implemented.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
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VI. GEOLOGY AND SOILS -- Would *the project*:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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-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 Uniform Building Code (1994), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> |

DISCUSSION:

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

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

No Impact

According to Figure 4F of the State Geologist's Fault-Rupture Hazard Zone map (http://www.consrv.ca.gov/cgs/rghm/ap/Map_index/Pages/F4F.aspx), the project site is not located within an Alquist-Priolo Earthquake Fault Zone delineated by the State of California for the hazard of fault surface rupture. As a result, no impacts are anticipated and no mitigation measures are required.

- ii. Strong seismic ground shaking?**

Less Than Significant Impact

The project site is located in a seismically active area, as is the majority of southern California. The most significant seismic hazard at the site is considered to be shaking caused by an earthquake occurring on a nearby or distant active fault. The nearest active fault is the Rose Canyon Fault located approximately fourteen (14) miles southwest of the site. If approved, and pursuant to the requirements of the California Building Code (CBC), the project will be required to be constructed to the standards of Seismic Design Category "D." Compliance with the CBC standards ensures that, to the extent possible under those standards, potential impacts related to strong seismic ground shaking would be less than significant. As a result, less than significant impacts from strong seismic ground shaking are anticipated and no mitigation measures are required.

- iii. Seismic-related ground failure, including liquefaction?**

Less Than Significant Impact

Liquefaction of soils can be caused by ground shaking during earthquakes when sandy soils are saturated with water causing the soil to take on the consistency of a thick liquid. According to Figure E-1 of the San Marcos General Plan (Geotechnical Conditions), the project site is located in an area delineated as "stable." In addition, compliance with the requirements contained in the latest adopted California Building Code will be required for the design and construction of the project. As a result, less than significant impacts are anticipated from seismic-related ground failure and no mitigation measures are required.

- iv. Landslides?**

Less Than Significant Impact

Landslide hazard areas are generally considered to exist when substantial slopes are located on or immediately adjacent to the subject property. While the property is sloped, the project site is relatively flat due to previous grading for fairways associated with the PAR 3 golf course. As previously discussed, compliance with latest adopted California Building Code will be required for the design and construction of the project and as a result, no impacts are anticipated that would cause landslides associated with the project and no mitigation measures are required.

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

Less Than Significant Impact

The site may be susceptible to soil erosion during the short-term construction activities. Short-term erosion effects during the construction phase of the project would be prevented through implementation of Best Management Practices (BMP's), which are required in accordance with the Chapter 14.15 of the San Marcos Municipal Code (S.M.M.C.). The BMP's will include standard construction methods such as sandbags, silt fencing, and temporary detention basins to control on-site and off-site erosion. The incorporation of BMP's are required by the City during plan review and approval of process for Building Permits; therefore, with the implementation of BMP's, any impacts resulting from erosion during construction are expected to be less than significant.

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

Less Than Significant Impact

According to Figure E-1 of the San Marcos General Plan (Geotechnical Conditions), the project site is located in an area noted as "stable." While the property is sloped, the project site is relatively flat due to previous grading for fairways associated with the PAR 3 golf course. As with the development of any site on or near a hillside, the potential risk of soil destabilization is present. However as previously discussed, compliance with the latest adopted California Building Code will be required for the design and construction of the project and as a result, no impacts are anticipated from the project that would result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse and no mitigation measures are required.

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

No Impact

There are no known expansive soils as defined in Table 18-1-B of the Uniform Building Code (1994) present at the site. As previously discussed, compliance with the latest adopted California Building Code (formerly known as the Uniform Building Code) will be required for the design of the project. As a result, no impacts are anticipated from the project and no mitigation measures are required.

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

No Impact

The project is located within, and served by the Vallecitos Water District (VWD); the project will continue to be connected to the municipal sewer system. As a result, septic tanks or alternative waste water disposal systems are not required.

MITIGATION MEASURES: None.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
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VII. GREENHOUSE GAS EMISSIONS -- Would the project:

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|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION:

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

Less Than Significant Impact

The project would directly and indirectly create greenhouse gas (GHG) emissions. During the construction phase of the project, the use of diesel powered construction equipment and the use of some building materials, such as concrete will directly emit greenhouse gases, while the ongoing operation of the facility would indirectly create an incremental increase in GHG emissions from the project's electrical power consumption and the burning of fossil fuels in service vehicles.

State law defines greenhouse gases as Carbon Dioxide (CO₂), Methane (CH₄), Nitrogen (N₂), Hydrofluorocarbons (HFC's), Perfluorocarbons (PFC's) and Sulfur Hexafluoride (SF₄), the most common greenhouse gases associated with human activity are CO₂, CH₄ and N₂. Furthermore, the California Air Pollution Control Officers Association (CAPCOA) has established a 900 tons/year threshold of significance for CO₂ emissions from commercial projects. The project would contribute significantly less than 900 tons/year of CO₂ during both the construction and operational phases. As a result, the project is not expected to generate greenhouse gas emissions that may have a significant impact on the environment and no mitigation measures are required.

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

No Impact

As discussed above, the construction and operation of the proposed project will not violate air quality standards, exceed significance thresholds or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions. As a result, the project is not expected to have an impact and no mitigation measures are required.

MITIGATION MEASURES: None.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
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VIII. HAZARDS AND HAZARDOUS MATERIALS -- Would *the project*:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <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 checked="" type="checkbox"/> | <input 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 a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Potentially Significant Unless Mitigated

Once operational, the telecommunication facility will both transmit and receive electromagnetic waves (Radio Frequency or RF) in the vicinity of the project through the use of twelve (12) panel antennas. Section 704 of the Telecommunication Act of 1996 states that "No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the commission's regulations concerning such emissions." Therefore, the City may not deny the proposed project based upon perceived health impacts of these facilities. The Federal Communications Commission (FCC) has developed exposure guidelines which are the implementing regulations for Section 704. The FCC guidelines require evaluation to determine whether transmitters of facilities comply with the FCC radio frequency (RF) guidelines, incorporating Maximum Permissible Exposure (MPE) limits. MPE limits are defined in terms of power density, electric field strength, and magnetic field strength to which a person may be exposed without harmful effect. The standards established in the FCC RF guidelines constitute exposure limits and are relevant only to facilities that are accessible to workers or members of the public.

Pursuant to FCC regulations, the City has required documentation from the applicant to confirm that the wireless antenna facility is operating within the FCC MPE limits for RF. To this end, the applicant has provided an analysis of the projected RF emissions of the site prepared by Dr. Jerrold T. Bushberg (included as Appendix "B") which concluded that the "proposed wireless facility as specified [above] would be in full compliance with FCC RF Public safety standards." Dr. Bushberg went on to note that "the FCC maximum allowable exposures are not set at a threshold between safety and known hazard, but 50 times below a level that the majority of the scientific community believes may pose a health risk to human populations." In addition to Dr. Bushberg's analysis of the site, the City of San Marcos requested that Mr. Jonathan L. Kramer conduct an independent analysis of the site to verify that the operation of the site will be in conformance with FCC regulations. Mr. Kramer's analysis (included as Appendix "C") concluded that as proposed, the facility would operate in compliance with FCC regulations. Nonetheless, the City will require that once the facility becomes operational, that a survey of RF levels at the project site be submitted to confirm that the operation of the site is in compliance with FCC regulations. With the incorporation of these mitigation measures, potentially significant impacts are expected to be less than significant.

- MM 8.1 - Within six months of final inspection approval for the installation, the applicant/operator of the facility shall submit to the Planning Division a project implementation report which provides field measurements of radio frequency densities of all antennas installed on the subject site, and all existing ambient levels of radio frequency emissions. This report shall include a written summary comparing results of the field measurements with FCC standards (i.e.: stating emissions as a percentage of FCC limits). Additionally, this report shall be conducted at a time that the facility is operating at its designed maximum power output level. If panel antennas are installed in phases, said report shall be updated when additional antennas are installed (not to exceed maximum of 12 panel antennas). The applicant shall submit to the Planning Division a copy of applicable FCC documentation (i.e.: license, permit, etc.) authorizing the operation of the facility.

- MM 8.2 - The report shall be subject to review and approval by the Planning Division Director. Upon receipt of sufficient public expression of concern that a Telecommunications Facility does not comply with existing FCC radio frequency guidelines, the City may utilize the services of an independent radio frequency engineer to verify, at the Telecommunications Carrier's expense, the Facility's compliance with federal guidelines. If the City finds that the facility is not in compliance with FCC standards, the City shall require the facility to be modified to comply with FCC standards, or the facility shall be entirely removed from the site.
- MM 8.3 - The applicant/operator shall at all times comply with all FCC rules and regulations, including without limitation, the RF emissions safety requirements of FCC Office of Engineering Bulletin 65, and any successors thereto. It shall be responsibility of the applicant to contact the City acknowledging any changes in the regulations that would affect the Telecommunications Facility.

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

Less Than Significant Impact

The project will be required to operate in compliance with FCC regulations pertaining to Maximum Permissible Exposure (MPE) limits for RF emissions. As previously discussed, the technical report notes that the "FCC maximum allowable exposures are not set at a threshold between safety and known hazard, but 50 times below a level that the majority of the scientific community believes may pose a health risk to human populations." As a result, the project is not expected to create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment and no additional mitigation measures are required.

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

Less Than Significant Impact

The nearest school to the project site is Knob Hill Elementary School, which is approximately 0.25 miles northwest of the project site. As discussed previously, the facility is required to operate in compliance with FCC regulations as they pertain to Maximum Permissible Exposure (MPE) limits for RF emissions. As a result, no impacts are anticipated from the proposed project and no mitigation measures are required.

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

The proposed project is not located on a hazardous materials site as designated by Government Code Section 65962.5. A review of the information on the Department of Toxic Substances Control website (www.envirostor.dtsc.ca.gov) did not identify any sites on the project site. As previously discussed, the project proposes limited subsurface disturbances and provided the previous use of the site (a PAR 3 golf course) the likelihood of the project creating a significant hazard to the public or the environment from

hazardous material sites is low. As a result, the project is not anticipated to have an impact and no mitigation measures are required.

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

Less Than Significant Impact

The closest public use airport is the McClellan-Palomar Airport, which is located about 9 miles west, southwest of the project site. According to the McClellan-Palomar Airport Land Use Compatibility Plan, the project site is located within Airport Influence Area (AIA) Review Area 2. AIA Review Area 2 consists of limitations on the height of structures, particularly in areas of high terrain. Given the fact the project site is located approximately 7 miles out of AIA Review area 1 (which encompasses areas with higher safety concerns) and that the project does not propose to exceed the ridge of the adjacent hillside to the east of the project site, no impacts from the project are anticipated and no mitigation measures are required.

- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact

The project site is not within the vicinity of a private airstrip. As a result, no impacts are anticipated that would result in a safety hazard for people residing or working in the project area and no mitigation measures are required.

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

No Impact

The City's design and environmental review procedures ensure compliance with emergency response and evacuation plans. In addition, the City of San Marcos Fire Department has reviewed the project and provided comments which have been included in the design of the facility and will be implemented during the Building Permit process. As a result, no impacts are anticipated that would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and no mitigation measures are required.

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

Less Than Significant Impact

Adequate emergency response capability is available. San Marcos Fire Station No. 3 is located within a 1.25-mile vicinity of the project site. As a result of standard City policies and the review of the project by the Fire Department, no impacts are anticipated and no additional mitigation measures are required.

MITIGATION MEASURES:

- MM 8.1 - Within six months of final inspection approval for the installation, the applicant/operator of the facility shall submit to the Planning Division a project implementation report which provides field measurements of radio frequency densities of all antennas installed on the subject site, and all existing ambient levels of radio frequency emissions. This report shall include a written summary comparing results of the field measurements with FCC standards (i.e.: stating emissions as a percentage of FCC limits). Additionally, this report shall be conducted at a time that the facility is operating at its designed maximum power output level. If panel antennas are installed in phases, said report shall be updated when additional antennas are installed (not to exceed maximum of 12 panel antennas). The applicant shall submit to the Planning Division a copy of applicable FCC documentation (i.e.: license, permit, etc.) authorizing the operation of the facility.
- MM 8.2 - The report shall be subject to review and approval by the Planning Division Director. Upon receipt of sufficient public expression of concern that a Telecommunications Facility does not comply with existing FCC radio frequency guidelines, the City may utilize the services of an independent radio frequency engineer to verify, at the Telecommunications Carrier's expense, the Facility's compliance with federal guidelines. If the City finds that the facility is not in compliance with FCC standards, the City shall require the facility to be modified to comply with FCC standards, or the facility shall be entirely removed from the site.
- MM 8.3 - The applicant/operator shall at all times comply with all FCC rules and regulations, including without limitation, the RF emissions safety requirements of FCC Office of Engineering Bulletin 65, and any successors thereto. It shall be responsibility of the applicant to contact the City acknowledging any changes in the regulations that would affect the Telecommunications Facility.