



**Addendum**  
**General Plan & Zoning Ordinance Update FEIR**  
**State Clearinghouse # 2011071028 (Certified February 14, 2012)**  
**2013 Zoning Ordinance Update**  
**Telecommunications Section (Chapter 20.465)**

DATE: December 13, 2013  
APPLICANT: City of San Marcos

1. PROJECT CASE NUMBER(S) / TITLE: P13-0065 (Text Amendment 13-001)  
Public Draft Zoning Ordinance Update – Telecommunications Section
2. LEAD AGENCY NAME AND ADDRESS: City of San Marcos, 1 Civic Center Drive, San Marcos, CA 92069.
3. CONTACT PERSON AND PHONE NUMBER: Karen Brindley, Principal Planner, 760 744-1050 ext.3220
4. PROJECT LOCATION: City-wide
5. PROJECT SPONSOR'S NAME AND ADDRESS: City of San Marcos, 1 Civic Center Drive
6. GENERAL PLAN DESIGNATION: Multiple
7. ZONING: Multiple
8. BACKGROUND:

The City of San Marcos is located in the central portion of northern San Diego County (North County), approximately 40 miles north of downtown San Diego (Exhibit 1, Project Location Map). The City limits, i.e., Project Area, is shown in white on Exhibit 1 (per the General Plan FEIR) is bound by the cities of Vista and Carlsbad to the west, by the City of Escondido to the east; and by unincorporated areas within the County of San Diego to the north and south. Regional access to the City is provided by State Route 78 (SR-78). SR-78 is situated in an east-west orientation, and links Interstate 5 with Interstate 15 that provides north-south regional access. Access to the City is also provided by the North County Transit District (NCTD) Sprinter, the commuter light rail system connecting San Marcos to neighboring jurisdictions. San Marcos has not public airport but is located approximately 2.5 miles west of the McClellan-Palomar Airport located west of the City within the City of Carlsbad.

San Marcos is characterized by steep ridgelines of local mountains which form Twin Oaks Valley, the San Marcos Creek and watershed, and the foothills of San Marcos Creek. Twin Oaks Valley has

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historically been an agricultural area capitalizing on the unnamed tributary of San Marcos Creek that runs through the area; however, in recent decades agricultural lands have been converting to low density residential development. The majority of San Marcos Creek is urbanized, running between Discovery Street and San Marcos Boulevard and continuing in a north eastern direction east of Twin Oaks Valley. This portion of San Marcos Creek is adjacent to the existing and planned “urban core” of the community. Foothills along the southern boundary of San Marcos Creek include Double Peak and Frank’s Peak which are over 1,600 feet above mean sea level. These foothills support a natural vegetation community and protected habitat and species. This natural setting supports unique habitats like vernal pools, sensitive plant and wildlife species and agricultural areas.

Elevations in the City range from approximately 1,715 feet above mean sea level (amsl) at Mt. Whitney on the south to about 325 feet on the southwest where San Marcos Creek crosses the City boundary. Development is present throughout the planning area, occupying the lower elevations in the San Marcos Creek valley and Twin Oaks valley areas, and the hillside areas surrounding these valleys. Underlying formations are young and older alluvium in the lowest areas, sedimentary and crystalline rocks in the intermediate elevation hills, and metavolcanic/crystalline rocks in the higher hills and mountains.

In fall 2009, the City of San Marcos initiated a collaborative program to complete a comprehensive update of its General Plan and Zoning Ordinance by appointing the General Plan Advisory Committee (GPAC). The GPAC held 24 public meetings which included public input, Staff and consultant collaboration. During the GPAC and General Plan update process, several zoning-related topics were publicly addressed including non-conforming structures, need for a transitional zone, and land use decisions regarding focus areas that impact the Zoning Map. Through this process the City focused their efforts on updating the General Plan first, to guide the direction of the subsequent Zoning Ordinance update. The General Plan and FEIR (“GPA FEIR”) was adopted by resolution by the City Council on February 14, 2012. The subsequent Zoning Ordinance update was approved in October 2012 and an Initial Study was conducted.

Previous analysis of environmental impacts has been conducted for the General Plan and Zoning Ordinance updates, including two Initial Studies (one for the General Plan update and one for the Zoning update), a draft EIR, and a Certified Final PEIR (“Final PEIR”).

The proposed Telecommunications Section (Chapter 20.465) update is a supplemental update to the Zoning Ordinance update of 2012 in order to provide a more uniform and comprehensive set of procedures and standards for the development, siting, installation, and removal of Wireless Telecommunication Facilities, Amateur Radio Facilities, and Over-the-Air Receiving Devices.

## 9. DESCRIPTION OF PROJECT:

The City of San Marcos Zoning Ordinance (Title 20 of the San Marcos Municipal Code) serves as the primary implementation tool of the General Plan. Whereas the General Plan is a policy document and sets forth direction for development decisions, the Zoning Ordinance is a regulatory document that establishes specific standards for the use and development of all properties in the City. The Ordinance regulates development intensity using a variety of methods, such as setting limits on building setbacks, yard landscaping standards, and building heights. The City of San Marcos Zoning Ordinance was redesigned in 2012 to function as a more user-friendly document. The purpose of the current update to the Telecommunications Section of the Municipal Code is to provide a uniform and comprehensive set of procedures and standards for the development, siting, installation, and removal

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of Wireless Telecommunications Facilities, Amateur Radio Facilities, and Over-the-Air Receiving Devices. More specifically, the purpose of this chapter is as follows:

- A. Provide for the managed development and installation, maintenance, modification, and removal of wireless telecommunications infrastructure in the City with the fewest number of Wireless Telecommunications Facilities to complete a network without unreasonably discriminating against wireless telecommunications providers including all of those who install, maintain, operate, and remove Wireless Telecommunications Facilities.
- B. Promote and protect the public health, safety, and welfare by reducing the visibility of telecommunications facilities to the fullest extent possible through techniques including but not limited to camouflaging and underground of wireless facilities and the equipment associated therewith
- C. Reduce, if not eliminate, the impacts of telecommunications facilities on City residents and the traveling public, which includes encouraging the location of Wireless Telecommunications Facilities outside of residential and agricultural areas in the City.
- D. Effectively manage Wireless Telecommunications Facilities in the public Right of Way.
- E. Manage Amateur Radio Facilities and Over-the-Air Receiving Devices in the City.
- F. Comply with applicable state and federal laws.
- G. Grant no additional rights or entitlements to Wireless Telecommunications Facilities providers or operators to construct, maintain, modify, or remove Wireless Telecommunications Facilities, other than those rights or entitlements existing under applicable state or federal law.

## 10. ENVIRONMENTAL ANALYSIS FRAMEWORK

The Zoning Ordinance is a tool utilized by local governments to implement the General Plan. The Public Draft Zoning Ordinance represents an update to the Zoning Ordinance to bring the establishment and regulation of zoning districts (zones) into conformance with the Land Use and Community Design Element of the current General Plan.

The purpose of the Zoning Ordinance update was expanded to address current planning trends, standards, and innovations; streamline regulation; and reorganize the document and simplification of language to improve public and staff understanding of the application and regulations of the Zoning Ordinance. The proposed updated ZO, including the updated Wireless Telecommunications Facility Chapter, is consistent with the General Plan update.

When a lead agency has already prepared an EIR, CEQA mandates that "no subsequent or supplemental environmental impact report shall be required by the lead agency or any responsible agency, unless one or more of the following events occurs: (a) substantial changes are proposed in the project which will require major revisions of the environmental impact report; (b) substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; (c) new information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available" (Cal. Pub. Res. Code, § 21166). State CEQA Guidelines Section 15162 clarifies that a subsequent EIR or supplemental EIR is only required when "substantial changes" occur to a project or the circumstances surrounding a project, or "new information" about a project implicates "new significant environmental effects" or a "substantial increase in the severity of previously significant effects."

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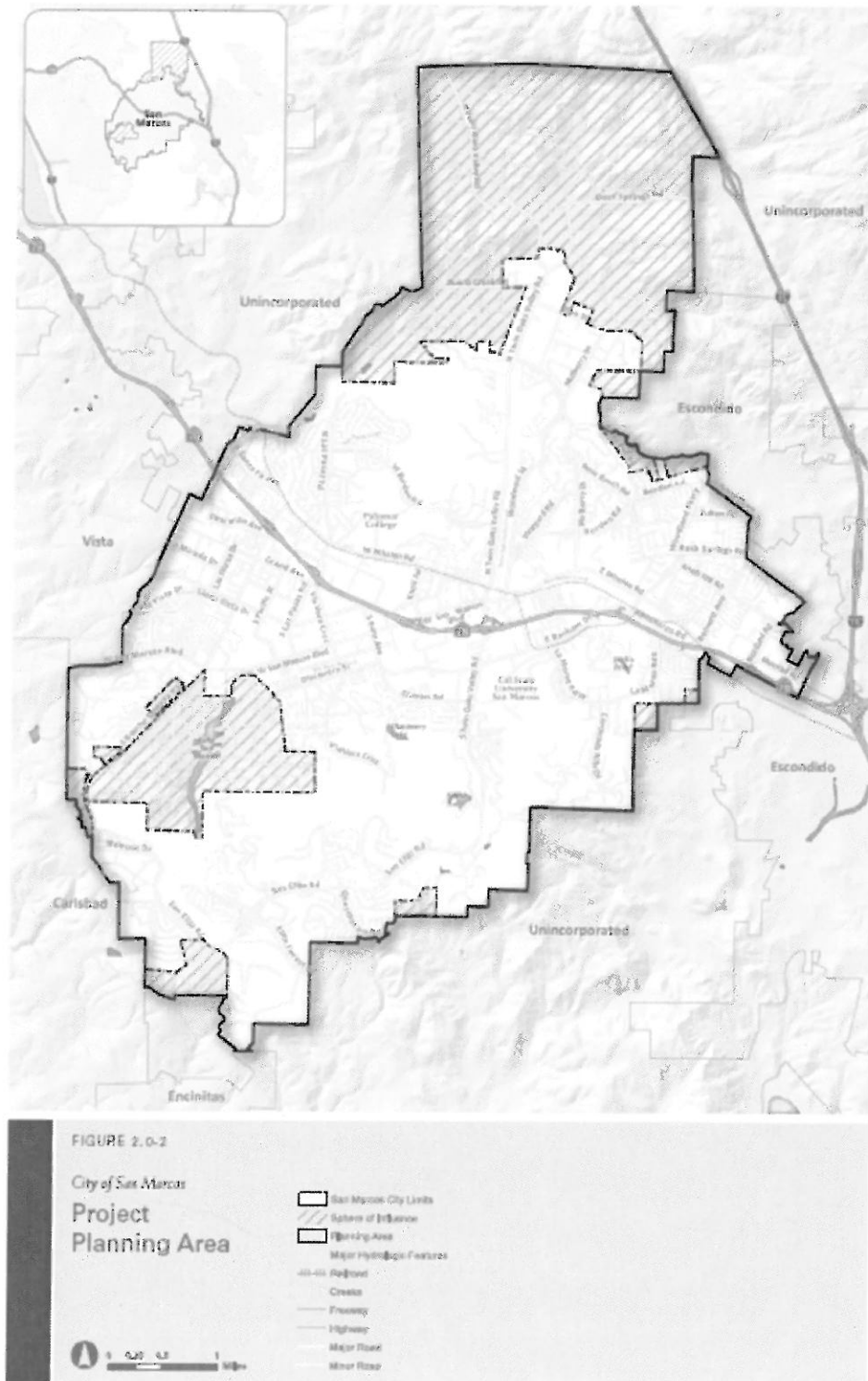
When only some changes or additions to a previously certified EIR are necessary and none of the conditions described in Public Resources Code Section 21166 or Section 15162 of the State CEQA Guidelines calling for the preparation of a subsequent or supplemental EIR are met, CEQA allows the lead agency to prepare and adopt an addendum. (State CEQA Guidelines, § 15164(a). The proposed update to the Telecommunications Chapter of the Zoning Ordinance will result in only some changes or additions to a previously certified EIR, and therefore an Addendum is now being prepared. This said, mitigation measures outlined in the GPA FEIR Table ES-3 (Attachment A to this Addendum), and as modified in the City Council adopting Resolution 2012-7615, where applicable, shall also be applied to the implementation of the Zoning Ordinance update, including the proposed update to the Telecommunications Chapter of the Zoning Ordinance.

11. REQUIRED APPROVALS

- Approval of the Zoning Ordinance Update (Text Amendment 13-001).



**Exhibit 1. Project Area Map**



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***Determination: (To Be Completed by the Lead Agency)***

On the basis of this initial evaluation:

- ☐ The City finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ The City finds 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 on an attached sheet have been added to the project. A NEGATIVE DECLARATION will be prepared.
- ☐ The City finds the proposed project may have a significant effect(s) 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. If the effect is a potentially significant impact or potentially significant unless mitigated an ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ The City finds that changes to the project or the circumstances under which the project would be undertaken require major revisions to the previous EIR in order to make the previous EIR adequately apply to the proposed project in accordance with Public Resources Code Section 21166 and CEQA Guidelines Section 15163. Thus, a SUBSEQUENT EIR shall be prepared.
- ☐ The City finds that changes to the project or the circumstances under which the project would be undertaken would require only minor revision to the previous MND in order to make the previous MND adequately apply to the proposed project in accordance with Public Resources Code Section 21166 and CEQA Guidelines Section 15163. Thus, a SUPPLEMENTAL MND shall be prepared.
- ☒ The City finds that the significant effects that would result from the project have been addressed in an earlier ENVIRONMENTAL IMPACT REPORT and that none of the determinations set forth in Public Resources Code Section 21166 and State CEQA Guidelines Section 15162 can be established. Thus, an ADDENDUM to the General Plan & Zoning Ordinance Update ENVIRONMENTAL IMPACT REPORT shall be prepared.

  
Karen Brindley

Principal Planner

Title

December 13, 2013

Date

City of San Marcos

Agency

## Environmental Analysis Checklist

ISSUES:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant Effects than Previous EIR	New Information Showing Ability to Reduce, but not Eliminate Significant Effects in Previous EIR	Less than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
<b>1. AESTHETICS</b> – Would the proposed project:						
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>2. AGRICULTURE RESOURCES</b> – 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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the proposed 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>3. AIR QUALITY</b> – 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 proposed project:						
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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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 exceeding quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<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 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>4. BIOLOGICAL RESOURCES – Would the proposed project:</b>						
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 type="checkbox"/>	<input checked="" 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, 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



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<b>5. CULTURAL RESOURCES – Would the proposed project:</b>						
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>6. GEOLOGY AND SOILS – Would the proposed project:</b>						
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<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 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 proposed project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>7. GREENHOUSE GAS EMISSIONS – Would the proposed project:</b>						
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>8. HAZARDS AND HAZARDOUS MATERIALS – Would the proposed project:</b>						
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 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 upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<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 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a proposed 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a proposed 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>9. HYDROLOGY AND WATER QUALITY – Would the proposed project:</b>						
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<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, in a manner that would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Expose people or structures to inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>10. LAND USE AND PLANNING</b> – Would the proposed project:						
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>11. MINERAL RESOURCES</b> – Would the proposed 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>12. NOISE</b> – Would the proposed project:						
a) Result in exposure of persons to or generation of noise levels 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the proposed project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



ISSUES:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant Effects than Previous EIR	New Information Showing Ability to Reduce, but not Eliminate Significant Effects in Previous EIR	Less than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a proposed 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 expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a proposed project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>13. POPULATION AND HOUSING</b> – Would the proposed project:						
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>14. PUBLIC SERVICES</b> – Would the proposed project:						
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:						
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ISSUES:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant Effects than Previous EIR	New Information Showing Ability to Reduce, but not Eliminate Significant Effects in Previous EIR	Less than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
<b>15. RECREATION – Would the proposed project:</b>						
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>16. TRANSPORTATION/TRAFFIC – Would the proposed project:</b>						
a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>17. UTILITIES AND SERVICE SYSTEMS – Would the proposed project:</b>						
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with Federal, State, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>18. MANDATORY FINDINGS OF SIGNIFICANCE</b>						
a). <b>POTENTIAL TO DEGRADE:</b> Does the proposed project 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b). <b>CUMULATIVE IMPACTS:</b> Does the proposed project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ISSUES:							
	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant Effects than Previous EIR	New Information Showing Ability to Reduce, but not Eliminate Significant Effects in Previous EIR	Less than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact	
c) <u>ADVERSE IMPACTS ON HUMANS:</u> Does the proposed project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	



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## Discussion of the Environmental Checklist Form Responses

The following Initial Study Environmental Checklist Form responses provide a summary and substantiation of the findings of the City of San Marcos. The proposed project is the approval of an updated Wireless Telecommunications Facilities Chapter of the Zoning Ordinance.

### 1. Aesthetics

- a-d. Less than significant:** The proposed Telecommunications Section update within the Zoning Ordinance is a supplemental update to the Zoning Ordinance update of 2012 in order to provide a more uniform and comprehensive set of procedures and standards for the development, siting, installation, and removal of Wireless Telecommunication Facilities, Amateur Radio Facilities, and Over-the-Air Receiving Devices.

The General Plan Update FEIR (refer to Section 3.1) indicates that implementation will not result in any significant adverse aesthetic impacts. The Zoning Ordinance update, including the update to the Wireless Telecommunications Facilities Chapter, is a regulatory document and would not result in the development of specific projects. It does not include site-specific development plans, but it does incorporate specific design standards for improved aesthetic design for future development. Future development applications submitted for development within the City of San Marcos would be subject to additional environmental review, which would ensure that aesthetic impacts are minimized. With the implementation of the updated Zoning Ordinance, future projects would be subject to the updated ZO levels of design review addressing building, design, landscaping, and lighting requirements, which, in turn, would enhance the aesthetic quality of future development. Therefore, no new impacts identified for this issue area beyond that which was identified in the GPA FEIR.

### 2. Agricultural Resources

- a, c-e. Less Than Significant:** Much of City is urbanized, particularly in the areas immediately adjacent to SR-78. Most of the cities agricultural land is located in the northern part of San Marcos in the Twin Oaks Valley Neighborhood. Smaller areas of grazing land, Farmland of Local Importance, and Unique Farmland are located south of SR-78, and can be found in the Lake San Marcos and Questhaven/La Costa Meadows neighborhoods. San Marcos has been developed and agricultural land use is limited with the City Limits. The GPA FEIR identified one mitigation measure for impacts to agricultural lands which is the update to the Zoning Ordinance to address conflicts between the General Plan and Agricultural Zoning. Implementation of the updated ZO, including the Telecommunications update, will therefore result in a less than significant impacts and no further impact than was addressed in this issue area in the GPA FEIR. No further mitigation is required.

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- b. **Less Than Significant.** The Williamson Act properties are located within the northern City Sphere of Influence and not within the City limits. The Implementation of the updated ZO, including the update to the Wireless Telecommunications Facility Chapter will not modify, and therefore not impact, the status of two parcels currently under Williamson Act contracts within the City. Implementation of the updated ZO will therefore result in less than significant impacts in this issue area and no further mitigation is required.

### 3. Air Quality

- a. **Less Than Significant.** Air quality planning efforts are based on analysis and forecasts of air pollutant emissions throughout the entire region. Consistency with air quality planning efforts is based on the consistency of the General Plan with the regional air quality plan. Policies in the General Plan include a variety of actions aimed at cooperating with SANDAG and regional planning efforts. The SANDAG 2050 Regional Transportation Plan (RTP) is a comprehensive approach to addressing the region's mobility challenges. The General Plan update includes relevant goals and policies that reflect and respond to the SANDAG RTP. Concurrent with the implementation of the General Plan update, the updated ZO, The Zoning Ordinance update, including the update to the Wireless Telecommunications Facility Chapter, would serve as a tool to implement the General Plan and not obstruct or conflict with any Air Quality Plan.
- b. **Significant and unavoidable.** The General Plan update FEIR concluded that implementation of the update would result in construction and operational emissions that would occur over an extended period or be of an intensive nature, therefore resulting in an impact to air quality. The application of mitigation measures including the use of renewable energy features and others listed (AQ-1 to AQ-5) in Mitigation Table ES-3 of the GPA FEIR will not reduce the emission thresholds to a level below significant for which the region is in nonattainment. The updated ZO as an implementing tool for the General Plan will implement the goals, policies and applicable mitigation measures as outlined in the GPA FEIR. In so doing, however, the ZO will also allow for new construction and operational activities that would not reduce the significant and unmitigated impacts identified in the adopted General Plan. Therefore, the conclusions in the GPA FEIR are still applicable to the updated ZO. The updated ZO, The Zoning Ordinance update, including the update to the Wireless Telecommunications Facility Chapter, as an implementing tool for the GPA FEIR, however will not allow any emissions beyond that which was not already considered in the GPA FEIR. No new impacts for this issue area are generated as a result of the updated ZO, including the Telecommunications update. The provision of mixed use zoning districts, complete streets, implementation of transit opportunities will minimize significant and unmitigated impacts, but not below a level of significance.

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- c. **Less Than Significant.** Specific types of emissions and emission levels with any future land use proposal cannot be determined until such a proposal is submitted for City review. A future land use proposal would then be subject to the applicable CEQA level review. Since the proposed updated ZO is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO, The Zoning Ordinance update, including the update to the Wireless Telecommunications Facility Chapter, would not authorize any activities that would result in release of substantial concentrations of air pollutants. The updated ZO would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.
- d. **Less Than Significant.** The updated ZO, The Zoning Ordinance update, including the update to the Wireless Telecommunications Facility Chapter, would not authorize any activity known to generate significant odor problems. Specific types of emissions and emission levels with any future land use proposal cannot be determined until such a proposal is submitted for City review. A future land use proposal would then be subject to the applicable CEQA level review. The updated ZO would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.

#### 4. Biological Resources

- a-d. **Less Than Significant.** Within the City, several sensitive vegetation communities/land cover types occur that provide habitat for a variety of plant and animal species. The General Plan update through the development of proposed projects will result in direct, indirect, temporary, and permanent impacts to biological resources. Mitigation measures BR-1 to BR-5 outlined in GPA FEIR ES-3 will address impacts on Critical Habitat, Vegetation Communities, and Jurisdictional Waters Including Wetlands and Riparian Habitat. Implementation of these measures in coordination with federal, state and local regulations would reduce the General Plan impacts associated with biological resources and result in a less than significant impact in this issue area. The Zoning Ordinance update, including the update to the Wireless Telecommunications Facility Chapter, would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.
- e-f. **Less Than Significant.** The Zoning Ordinance update, including the update to the Wireless Telecommunications Facility Chapter, is a regulatory-level document and would not directly cause development or redevelopment of specific projects within the City. Case-by-case review of future development projects is required by the City to assess the potential for project specific biological impacts and project consistency with State and federal regulations and all General Plan goals, objectives and policies as well as compliance with the updated ZO. Because the updated ZO is a regulatory-level document, the update does not include any site-specific designs or proposals for assessment of potential site-specific biological impacts that may result from future development proposals.

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## 5. Cultural Resources

- a-b,d. Less Than Significant.** Implementation of the San Marcos General Plan that would allow for new development would result in significant impacts related to Cultural Resources as outlined in Section 3.5 of the GPA FEIR. Mitigation measures (CR-1 to CR-8) as outlined in Attachment A will mitigate the impacts to below a level of significance. The updated ZO, as an implementing tool for the GPA FEIR, however will not allow any cultural impacts beyond that which was not already considered in the GPA FEIR. Case-by-case review of future development projects is required by the City to assess the potential for project specific cultural impacts and project consistency with State and federal regulations and all General Plan goals, objectives and policies as well as compliance with the updated ZO. Because the updated ZO is a regulatory-level document, the update does not include any site-specific designs or proposals for assessment of potential site-specific paleontological impacts that may result from future development proposals. No new impacts for this issue area are generated as a result of the updated ZO.
- c. Less Than Significant.** The City is underlain by old alluvial flood plain deposits of an unproven/undetermined paleontological sensitivity (Deméré and Siren 2010). Though no specific paleontological resources are documented in the planning area, buried paleontological resources may exist. Implementation of the General Plan would not result in any direct impacts regarding paleontological resource disturbance within the planning area. Ground-disturbing activities, such as construction associated with development, and/or expansion of infrastructure, have the potential to impact buried paleontological resources. Thus, development of land pursuant to the General Plan has the potential to impact significant known and unknown paleontological resources. However, the majority of development anticipated under the General Plan will involve redevelopment of or new development within existing developed areas. Substantial excavation activities for installation of new infrastructure would be limited to new development in undeveloped areas; potential for this type of development does exist but is limited by the General Plan. Thus, the likelihood of finding new or undiscovered paleontological resources is limited.

Existing City of San Marcos review processes and conservation/management policies protect prominent land forms, reduce run off, and limit human interaction with unmanaged open space. The City assesses and mitigates the potential impacts of private development and public facilities and infrastructure to these resources pursuant to the provisions of CEQA. The City will continue to review future development proposals to ensure that paleontological resources are conserved in compliance with CEQA requirements. With adherence to and implementation of existing regulations and City review processes, the GPA FEIR determined that impacts to paleontological resources will be less than significant. No mitigation is required.



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Because the updated ZO is a regulatory-level document, the update does not include any site-specific designs or proposals for assessment of potential site-specific paleontological impacts that may result from future development proposals. No new impacts for this issue area are generated as a result of the updated ZO, including the Telecommunications section.

## 6. Geology and Soils

- a. **Less Than Significant.** The City is not located within a designated Alquist-Priolo fault zone. However, the Rose Canyon, Newport-Inglewood and Elsinore faults are active and potentially active and within proximity to potentially create earth shaking in the City. Since 1986, the geologic studies of North County indicate that the City does not have any active earthquake faults traversing the area. Another potential source of ground shaking could result from an onshore projection of the (Oceanside) Thirty Mile Bank Blind thrust fault that may underlie the City. City code and ordinances require that all development activity comply with local and state building seismic codes, as they apply to the structure proposed. The city has required all structures built after 1984 to comply with Seismic Zone 4 standards, the highest resistant standards in the most current Building Code.

Further, the General Plan Safety Element contains policies that recognize potential hazards and set forth actions the City and the development community would be required to undertake to minimize potential hazards due to fault rupture. These policies require site-specific geology, geotechnical, and earthquake engineering investigations and mitigation as prescribed by licensed professionals as part of the environmental development review process. With adherence to and implementation of the proposed General Plan policies, City regulations, and implementation of existing federal, state, and local laws and regulations concerning seismic safety program-level impacts related to fault rupture would be less than significant.

With adherence to and implementation of the proposed General Plan policies and regulations, and implementation of existing federal, state, and local laws and regulations concerning seismic safety (as described in Section 3.6.2 of GPA FEIR), program-level impacts related to earthquake-induced ground failure and liquefaction would be less than significant.

The City of San Marcos will continue to implement building code standards for the development of safe structures. Implementation of the proposed General Plan does not prescribe any actions that would result in the location of development in relation to soil-slip susceptible areas. With adherence to and implementation of the proposed General Plan policies and regulations, and implementation of existing federal, state, and local laws and regulations concerning seismic safety program-level impacts related to earthquake-induced landslides would be less than significant.

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Because the updated ZO is a regulatory-level document, the update does not include any site-specific designs or proposals for assessment of potential site-specific geology and soils impacts that may result from future development proposals. No new impacts for this issue area are generated as a result of the updated ZO.

- c-d. **Less Than Significant.** Existing building codes and ordinances enforced by the City, and policies of the General Plan require all new development to be consistent with current California Building codes and natural hazard mitigation standards. These codes address grading, excavation, fills, and applicable geotechnical report preparation and submittal. Application of the existing regulations identified in the Municipal Code and Uniform Building Code and grading regulations would minimize the risk associated with any development proposed within areas containing expansive soils. Therefore, program-level impacts associated with expansive and collapsible soils would be less than significant.
- e. **Less Than Significant.** With adherence to City of San Marcos regulations, and implementation of existing federal, state, and local laws and regulations concerning building construction and hazard mitigation (as described in Section 3.6), program-level impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems would be less than significant.

Implementation of the San Marcos General Plan would result in less than significant impacts related to geology, and soils. No mitigation is required in the GPA FEIR.

Because the updated ZO is a regulatory-level document, the update does not include any site-specific designs or proposals for assessment of potential site-specific geology and soils impacts that may result from future development proposals. No new impacts for this issue area are generated as a result of the updated ZO, including the Telecommunications update section.

## 7. Greenhouse Gas Emissions

- a. **Significant and Unavoidable.** With regard to the generation of Greenhouse Gas Emissions (GHG's), the GPA FEIR concluded that that construction related gas emissions generated by construction via the land uses approved in the General Plan update would be primarily in the form of CO<sub>2</sub>. Construction-generated exhaust emissions would be temporary and short term in they would occur only during the buildout period. In addition, the regulatory environment that continues to evolve under the mandate of Assembly Bill 32 (AB 32), Climate Change Scoping Plan (Scoping Plan), and mandating California emissions reductions by 2030. This mandate is expected to reduce some of the GHG emissions from construction activity. There are currently no State or regional standards to evaluate construction generated GHG's; therefore the threshold is based on a quantitative evaluation of whether the project implements applicable Best Management Practices (BMP's) for reducing GHG emissions related to construction activities. To this end, mitigation measures GHG-1 to GHG-3 are included in the GPA FEIR.

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With the incorporation of the mitigation measures outlined in the GPA FEIR in combination with the policies of the General Plan, construction emissions impacts are less than significant.

Further, to address operational impacts GHG-4 to GHG-10 are also included. The application of the mitigation measures to operational GHG impacts, however, would reduce GHG emissions, but it is unclear to what extent the measures would be applied throughout the project area. Therefore, it cannot be ensured that these reductions would reduce emissions below the required levels for the City services population in 2030 as required by AB 32. This said, mitigation measures GHG-4 to GHG-10 would result in impact reductions, but not to a level below significant. This impact would remain significant and unavoidable.

Since the proposed updated ZO, including the update to the Wireless Telecommunications Facilities Chapter, is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO would not authorize any activities that would result in release of substantial concentrations of greenhouse gas emissions. The updated ZO would not generate any greater impact than the significant and unavoidable impacts as determined in the GPA FEIR for this issue area.

In so doing, however, the ZO will also allow for new construction and operational activities that would not reduce the significant and unmitigated impacts identified in the adopted General Plan. Therefore, the conclusions in the GPA FEIR are still applicable to the updated ZO. The updated ZO, as an implementing tool for the GPA FEIR, however will not allow any emissions beyond that which was not already considered in the GPA FEIR. Specific types of emissions and emission levels with any future land use proposal cannot be determined until such a proposal is submitted for City review. A future land use proposal would then be subject to the applicable CEQA level review. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not generate any greater impact than impact levels as determined in the GPA FEIR for this issue area.

- b. Less Than Significant.** The General Plan would not conflict with the AB 32 Scoping Plan, or any other plans, policies, or regulations for the purpose of reducing GHG emissions. Neither the City nor any other agency with jurisdiction over this project has adopted climate change or GHG reduction measures with which the General Plan would conflict.

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Since the proposed updated ZO, including the update to the Wireless Telecommunications Facility Chapter, is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not authorize any activities that would result in release of substantial concentrations of greenhouse gas emissions. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.

## 8. Hazards and Hazardous Materials

- a-h. Less Than Significant.** Implementation of the San Marcos General Plan would result in significant impacts related to hazardous materials, flood, fire and emergency planning. Mitigation measures included in the GPA FEIR (HM-1 to HM-8) are programmatic in nature, and would be refined in project-specific CEQA documents. Since the proposed updated ZO is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO would not authorize any activities that would result in release of hazardous materials. The updated ZO would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.

## 9. Hydrology and Water Quality

- a, c-n. Less Than Significant.** Mitigation Measures HWQ-1, HWQ-2, HWQ-3, HWQ-4, HWQ-5, HWQ-6, HWQ-7, HWQ-8, HWQ-9, HWQ-10, HWQ-11, and HWQ-12 of the GPA FEIR are proposed to address the impacts related to hydrology and water quality. With adherence to, and implementation of, the General Plan policies, and implementation of Mitigation Measures HWQ-1, HWQ-2, HWQ-3, HWQ-4, HWQ-5, HWQ-6, HWQ-7, HWQ-8, HWQ-9, HWQ-10, HWQ-11, and HWQ-12 the potential impacts on hydrology and water quality will be reduced to a less than significant level at the General Plan program level. Neither the City nor any other agency with jurisdiction over this project has adopted climate change or GHG reduction measures with which the General Plan would conflict.

Since the proposed updated ZO is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO would not authorize any activities above that which was addressed in the GPA FEIR. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.

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- b. **Less Than Significant.** Impacts related to water resources and the depletion of groundwater supply are less than significant based on the existing regulatory setting, actions of the City, and policies of the General Plan. Since the proposed updated ZO is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO would not authorize any activities above that which was addressed in the GPA FEIR. The updated ZO would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.
- o-r. **Less Than Significant.** Impacts related to altering existing drainage patterns; flood hazard areas and risks; and inundation by seiche, tsunami, or mudflow are less than significant based on existing conditions and regulatory setting; mitigation is not required. Since the proposed updated ZO is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO would not authorize any activities above that which was addressed in the GPA FEIR. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.

## 10. Land Use and Planning

- a. **Less Than Significant.** Implementation of the General Plan would have a significant environmental impact if it would allow for the introduction of features that would divide the physical arrangement of an established community. Since the proposed updated ZO is consistent with the General Plan update, potential future new, facilities pursuant to the update to the Wireless Telecommunications Facility Chapter would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO would not authorize any activities above that which was addressed in the GPA FEIR. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.
- b-c. **Less Than Significant.** There are numerous laws, regulations, policies, programs, codes, and ordinances that regulate land use development within the City. To simplify the volume and complexity of these regulations, this inventory focuses on laws, regulations, and programs that affect land use designations and zoning. Laws, regulations, and programs that indirectly affect land use planning, such as traffic, biological resources, water quality, and air quality regulations, for example, are included in applicable subsections of the GPA FEIR.

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The purpose of the current update to the Wireless Telecommunications Facilities Chapter of the Municipal Code is to provide a uniform and comprehensive set of procedures and standards for the development, siting, installation, and removal of Wireless Telecommunications Facilities, Amateur Radio Facilities, and Over-the-Air Receiving Devices. More specifically, the purpose of this chapter is as follows:

- i. Provide for the managed development and installation, maintenance, modification, and removal of wireless telecommunications infrastructure in the City with the fewest number of Wireless Telecommunications Facilities to complete a network without unreasonably discriminating against wireless telecommunications providers including all of those who install, maintain, operate, and remove Wireless Telecommunications Facilities.
- ii. Promote and protect the public health, safety, and welfare by reducing the visibility of telecommunications facilities to the fullest extent possible through techniques including but not limited to camouflaging and underground of wireless facilities and the equipment associated therewith
- iii. Reduce, if not eliminate, the impacts of telecommunications facilities on City residents and the traveling public, which includes encouraging the location of Wireless Telecommunications Facilities outside of residential and agricultural areas in the City.
- iv. Effectively manage Wireless Telecommunications Facilities in the public Right of Way.
- v. Manage Amateur Radio Facilities and Over-the-Air Receiving Devices in the City.
- vi. Comply with applicable state and federal laws.
- vii. Grant no additional rights or entitlements to Wireless Telecommunications Facilities providers or operators to construct, maintain, modify, or remove Wireless Telecommunications Facilities, other than those rights or entitlements existing under applicable state or federal law.

The update to the Wireless Telecommunications Facility Chapter represents a complete overhaul of the application, regulation, and administration of wireless telecommunications facilities within the Zoning Ordinance to reflect the goals of the General Plan.



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With implementation of the updated ZO, , including the update to the Wireless Telecommunications Facility Chapter, the updated General Plan would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts associated with conflicts with an adopted land use plan, policy, or regulation would be reduced to a less than significant level.

## 11. Mineral Resources

- a. **Less Than Significant.** The San Marcos planning area is primarily not located within an area specifically identified by the California Department of Mines and Geology as having substantial mineral resources, as the majority of the planning area has been identified with MRZ-1, MRZ-3, and MRZ-4 mineral resource classifications. Limited portions of the City contains land designated as MRZ-2 locations, or areas where there are known mineral resources. MRZ-2 areas are limited to small portions between Double Peak, Mount Whitney, and Franks Peak. In addition, no known mineral resource recovery sites of local importance are included in the General Plan or any other specific land use plan associated with the planning area. As the planning area has no operating mine/quarry operations, implementation of the General Plan would not impact the land planning or function mine and quarry operations. Land use changes that would affect the current or future operation of these areas, site-specific or adjacent to, is not proposed. Further, policies of the Conservation and Open Space Element ensure compliance with CEQA and state law for the protection of mineral resources. Should new mineral resources be discovered in the future, the City will require compliance with CEQA and state policies for protection and extraction of such resources.

Since the proposed updated ZO, including the update to the Wireless Telecommunications Facility Chapter, is consistent with the General Plan update, potential future wireless telecommunications facilities pursuant to the updated ZO would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not authorize any activities that would result in impacts to mineral resources. The updated ZO would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.

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- b. **Less Than Significant.** The General Plan contains policies and programs to ensure compliance with CEQA and state law for the protection of significant aggregate resources, should any be discovered within the planning area. Given the limited range of MRZ-2 area in the planning area, and that the policies and programs included in the General Plan ensure the protection and preservation of mineral resources, impacts related to the loss of availability of a locally known mineral resource that would be of future value to the region and the residents of the state would be less than significant. Because the updated ZO, including the update to the Wireless Telecommunications Facility Chapter, is a regulatory-level document, the update does not include any site-specific designs or proposals for assessment of potential site-specific mineral resource impacts that may result from future development proposals. No new impacts for this issue area are generated as a result of the updated ZO, including the update to the Wireless Telecommunications Facility Chapter.

## 12. Noise

- a-d. **Less Than Significant.** For the General Plan update, the significance of anticipated noise effects is based on a comparison between predicted noise levels and noise criteria defined by the City of San Marcos and San Diego County. For the General Plan update, noise impacts are considered significant if existing or proposed noise sensitive land uses would be exposed to noise levels in excess of applicable standards as described in GPA FEIR Section 3.11.2.

As a result, this impact is considered significant; mitigation is required. Mitigation Measures N-1, N-2 and N-3 will address the impacts associated with groundborne vibration and noise. The implementation of Mitigation Measures N-1, N-2 and N-3 would reduce the groundborne vibration and noise impact of new wireless telecommunications facilities to a level less than significant.

Mitigation Measure N-4 is proposed to address the impacts associated with ambient noise levels. Mitigation Measure N-4 states contractors shall be required to implement specific measures during construction activities through contract provisions and/or conditions of approval as appropriate. The implementation of Mitigation Measure N-4 would reduce the ambient noise level impacts to a less than significant level.

At the General Plan level, impacts would be reduced to a less than significant level. If project-level impacts are identified as subsequent projects are proposed, specific mitigation measures would be required.

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- e-f. Less Than Significant.** Noise sensitive land uses proposed in the City per the updated General Plan could be exposed to noise from overflights of aircraft. However, implementation of the General Plan would not expose new or existing noise sensitive land uses to elevated aircraft noise levels. The General Plan determined that this impact is less than significant.

Since the proposed updated ZO, including the update to the Wireless Telecommunications Facility Chapter, is consistent with the General Plan update, potential future new wireless telecommunications facilities would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not authorize any activities that would result in impacts to mineral resources. The updated ZO would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.

### 13. Population and Housing

- a-c. Less Than Significant.** Since the proposed updated ZO, including the update to the Wireless Telecommunications Facility Chapter, is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO would not result in land use types of intensities not anticipated in the General Plan or the General Plan update FEIR. The updated ZO, including the Telecommunications update, would not authorize any activities that would result in impacts in this issue area beyond that which was addressed in the GPA FEIR. The updated ZO would not generate any greater impact than the less than significant impact as determined in the GPA FEIR for this issue area.

### 14. Public Services

- a. Less Than Significant.** The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, as an implementation of the General Plan update, would result in an impact that would be less than significant in the service areas of *Fire and Emergency Services, Police Protection, Schools, and Libraries*.

### 15. Recreation

- a-b. Less Than Significant.** The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not authorize any activity known to generate significant recreational impacts. Specific types of impacts associated with any future park proposal cannot be determined until such a proposal is initiated for review. A future park proposal would then be subject to the applicable CEQA level review. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not generate any greater impact than the less than significant impact as determined in the GPA EIR for this issue area.

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## 16. Transportation/Traffic

- a-f. **Less Than Significant.** Since the proposed updated ZO, including the update to the Wireless Telecommunications Facility Chapter, is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not result in traffic impacts not anticipated in the General Plan or the General Plan update EIR. A future land use proposal and its generated traffic would then be subject to the applicable CEQA level review. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not generate any greater impact than impact levels as determined in the GPA EIR for this issue area.

## 17. Utilities and Service Systems

- a-f. **Less Than Significant.** Since the proposed updated ZO, including the update to the Wireless Telecommunications Facility Chapter is consistent with the General Plan update, potential future wireless telecommunications facilities would not result in land use types of intensities not anticipated in the General Plan or the General Plan update EIR. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not authorize any activities that would result in impacts to *landfill capacity, solid waste regulations, stormwater drainage facilities and energy*, at the programmatic level of review. The updated ZO would not generate any greater impact than the less than significant impact as determined in the GPA EIR for this issue area.

## 18. Mandatory Findings of Significance

- a. **Less Than Significant with Mitigation.** The project will be mitigated and conditioned as outlined in the GPA EIR to mitigate any and all projects to a level below significant in the areas of biological and cultural resources, and will not cause substantial adverse effects on human beings, either directly or indirectly.

Since the proposed updated ZO, including the update to the Wireless Telecommunications Facility Chapter, is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO, including the Telecommunications update, would not result in land use types of intensities not anticipated in the General Plan or the General Plan update EIR. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not authorize any activities that would result in impacts above and beyond that which was addressed in the GPA EIR.

- b. **Less Than Significant with Mitigation.** The project will be mitigated and conditioned as outlined herein to mitigate any and all cumulative projects to a level below significant so as to ensure that there are no project impacts that are cumulatively considerable except as outlined in the GPA EIR.

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Since the proposed updated ZO, including the update to the Wireless Telecommunications Facility Chapter, is consistent with the General Plan update, potential future new, infill, or redevelopment pursuant to the updated ZO, , including the update to the Wireless Telecommunications Facility Chapter, would not result in land use types of intensities not anticipated in the General Plan or the General Plan update EIR. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not authorize any activities that would result in impacts above and beyond that which was addressed in the GPA EIR.

- c. **Less Than Significant with Mitigation** The project will be mitigated and conditioned to ensure that all impact areas contained herein are fully mitigated to below a level of significance and will not cause substantial adverse effects on human beings, either directly or indirectly except as outlined in the GPA EIR.

Since the proposed updated ZO is consistent with the General Plan update, potential future new wireless telecommunications facilities would not result in land use types of intensities not anticipated in the General Plan or the General Plan update EIR. The updated ZO, including the update to the Wireless Telecommunications Facility Chapter, would not authorize any activities that would result in impacts above and beyond that which was addressed in the GPA EIR.

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**ATTACHMENT A**  
**Summary of Environmental Impacts for the San Marco General Plan EIR**