

# **University District Specific Plan Amendment Initial Study and Final EIR Addendum**

**City of San Marcos**

**April 2014**

*Prepared by:*

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AGENDA ITEM

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### 1.0 INTRODUCTION

#### 1.1 PURPOSE AND SCOPE

This Initial Study/Addendum is an addendum to the Final Environmental Impact Report (FEIR) (State Clearinghouse No. 2008101083) certified by the City of San Marcos (City) in 2009 for the University District San Marcos Specific Plan (UDSP).

These documents serve as the environmental review of the proposed project, as required pursuant to the provisions of the California Environmental Quality Act (CEQA), Public Resources Code Section 21000, et seq., and the State and local CEQA Guidelines. A complete project description is included in Section 2.0.

Pursuant to the provisions of CEQA and the State and local CEQA Guidelines, the City of San Marcos is the Lead Agency. As part of the decision-making process, the City is required to review and consider the potential environmental effects that could result from the modification of the project analyzed in the previously certified EIR.

#### 1.2 PREVIOUS ENVIRONMENTAL DOCUMENTATION

In 2009, the San Marcos City Council certified the FEIR for the UDSP. The FEIR identified significant unmitigated impacts related to air quality (project- and cumulative-level CO, NOx and ROG impacts), cumulative greenhouse gas emissions, and cumulative traffic impacts. All other impacts were determined to be either less than significant in relation to the identified significance threshold levels, or to be mitigated to a level of less than significant through recommended mitigation measures. The complete FEIR is included as **Appendix A** of this document.

In 2011, the San Marcos City Council adopted a Mitigated Negative Declaration for a Conditional Use Permit (CUP) for a rock crusher within the University District Specific Plan area. The analysis concluded that all impacts were either less than significant in relation to the identified significance threshold levels, or to be mitigated to a level of less than significant through recommended mitigation measures. The MND for the rock crusher CUP is included as **Appendix B** of this document.

#### 1.3 FINDINGS OF THIS INITIAL STUDY/ADDENDUM

Pursuant to CEQA and the State CEQA Guidelines, this Initial Study/Addendum has been prepared in order to determine whether the proposed UDSP Amendment (the proposed project) will result in a change in circumstances, new impacts, or new information of substantial importance requiring the preparation of a subsequent or supplemental EIR.

This addendum reviews new information of substantial importance that was not known and could not have been known with exercise of reasonable diligence at the time the FEIR was certified. It further examines whether, as a result of any changes or any new information, preparation of a subsequent or supplemental EIR is required. This examination includes an analysis of the provisions of Section 21166 of CEQA and Section 15164 of the State CEQA Guidelines and their applicability to the proposed project. The focus of the examination is on whether the FEIR adequately addresses the impacts associated with development of the proposed project.

Pursuant to CEQA and the *State CEQA Guidelines*, the City's environmental review of the proposed project is limited to examining the environmental effects associated with the changes between the

## 1.0 INTRODUCTION

previously certified FEIR and the potential impacts which may result from implementation of the proposed project. This focus is due to the fact that the FEIR has already addressed the environmental impacts associated with the UDSP and that the San Marcos City Council certified that the FEIR was adequate and met the provisions of CEQA.

Based upon the information provided in the attached Initial Study/Addendum, the implementation of the proposed project will not result in any new significant impacts and the conclusions in the UDSP FEIR are valid for this project.

### 1.3.1 Use of an Addendum to a Previously Certified EIR

Section 15164 of the *State CEQA Guidelines* states that an Addendum to an EIR shall be prepared “if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Section 15162 of the *State CEQA Guidelines* identifies the conditions that require preparation of a subsequent EIR. A proposed change in a project will require preparation of a subsequent EIR if:

1. *The change in the project is substantial.*

Substantial changes in the project are those that would require major revision of the previous EIR due to the involvement of new significant environmental effects, or if a substantial increase in the severity of previously identified significant effects has occurred.

2. *The circumstances under which the project is undertaken have substantially changed.*

Substantial changes in circumstances are those defined as those that would require major revisions of the previous EIR in order to describe and analyze new significant environmental effects, or any changes that would cause a substantial increase in the severity of the previously identified significant effects.

3. *New information of substantial importance, which was not known and could have not been known, with the exercise of reasonable diligence at the time the previous EIR was certified, shows:*

- A. The project will have one or more significant effects not discussed in the previous EIR;
- B. The significant effects previously examined will be substantially more severe than identified in the previous EIR;
- C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives; or
- D. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

If none of the above conditions is met, the City is not required to prepare a subsequent EIR. Rather, the City may prepare a Mitigated Negative Declaration or an Addendum, or the City may decide that no further environmental documentation is necessary.

This Initial Study/Addendum has evaluated each of the issues addressed in the FEIR, as well as each of the issues contained in the checklist presented in Section 3.0 of this document.

## 1.0 INTRODUCTION

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Based on this analysis and the information contained herein, there is no evidence that the proposed project requires major changes to the FEIR. Comparison of the previous project with the proposed project, as described in Section 2.4 of this document, indicates that there are no new significant environmental impacts associated with implementation of the proposed project.

This Initial Study/Addendum relies on use of an Environmental Checklist Form (Form), as suggested in Section 15063 (d)(3) of the *State CEQA Guidelines*. The Form is used to evaluate whether or not there are any new or more severe significant environmental effects associated with implementation of the proposed project and proposed amendments; and to review whether there is new information or circumstances that would require preparation of additional environmental documentation in the form of a subsequent or supplemental EIR, or if an Addendum is appropriate.

Section 3.0 of this document contains the Checklist Form and explains the basis for each response to the questions on the Form.

### 1.4 EXISTING DOCUMENTS TO BE INCORPORATED BY REFERENCE

Section 15150 of the *State CEQA Guidelines* permits an environmental document to incorporate by reference other documents that provide relevant data.

The documents outlined in this section are hereby incorporated by reference, and the pertinent material is summarized throughout this Initial Study/Addendum, where that information is relevant to the analysis of impacts of the project. Any document incorporated by reference is available for review at City of San Marcos, Planning Division.

- *University District Specific Plan Final Environmental Impact Report*. 2009 (SCH No. 2008101083).
- *University District Rock Crusher Conditional Use Permit Mitigated Negative Declaration*. 2011. (SCH No. 2011081083)

The FEIR and MND are also included as Appendices B and C of this document.

### 1.5 CONTACT PERSON

The Lead Agency for the Initial Study/Addendum for the proposed project is the City of San Marcos. Any questions should be referred to the following:

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## 2.0 PROJECT DESCRIPTION

### 2.1 PROJECT SITE SETTING

The project site is located in the City of San Marcos, in the northern portion of San Diego County. The project area is the University District San Marcos Specific Plan (UDSP) as shown in **Figure 1a**. The approximate 195-acre project site is situated in the heart of San Marcos, with parcels located east and west of Twin Oaks Valley Road. The site is bounded by State Route 78 (SR 78) and San Marcos Creek on the north and Barham Drive and Discovery Hills on the south (**Figure 1b**). California State University San Marcos (CSUSM) is located adjacent to the southeast section of the University District project site.

The project area includes a mixture of low-density commercial, legal non-conforming and non-conforming industrial and residential uses, new student housing east of Twin Oaks Valley Road as well as undeveloped vacant lands.

### 2.2 PROPOSED DISCRETIONARY ACTIONS, PERMITS & CONSULTATION

The proposed project requires the following discretionary action by the City of San Marcos:

- Approval of Specific Plan Amendment
- Approval of Tentative Subdivision Map or Vesting Map
- Approval of Conditional Use Permit

### 2.3 PROJECT BACKGROUND

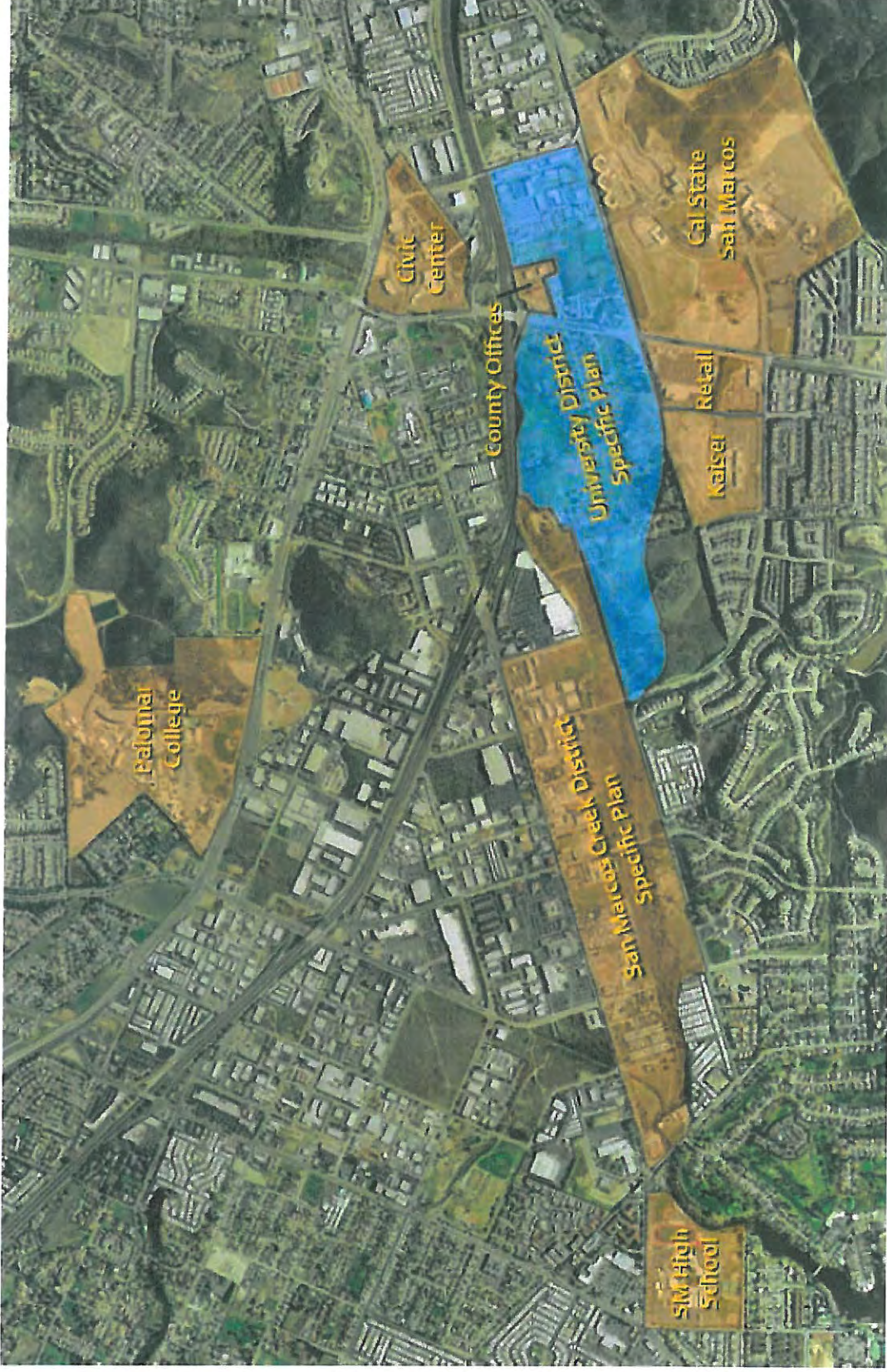
In 2009, the City of San Marcos approved the UDSP and certified the Final Environmental Impact Report (FEIR) (SCH No. 2008101083). In 2011 a Conditional Use Permit (CUP) for use of a rock crusher and modified grading operations at the site was approved and a Mitigated Negative Declaration (MND) was adopted for the CUP (SCH No. SCH No. 2011081083).

Since certification of the FEIR and approval of the CUP, the only new development that has occurred within the UDSP plan area is the Quad student housing project and associated infrastructure located east of Twin Oaks Valley Road and adjacent to CSUSM.

The project applicant is now proposing an amendment to the UDSP. These changes are detailed in Section 2.4, below.

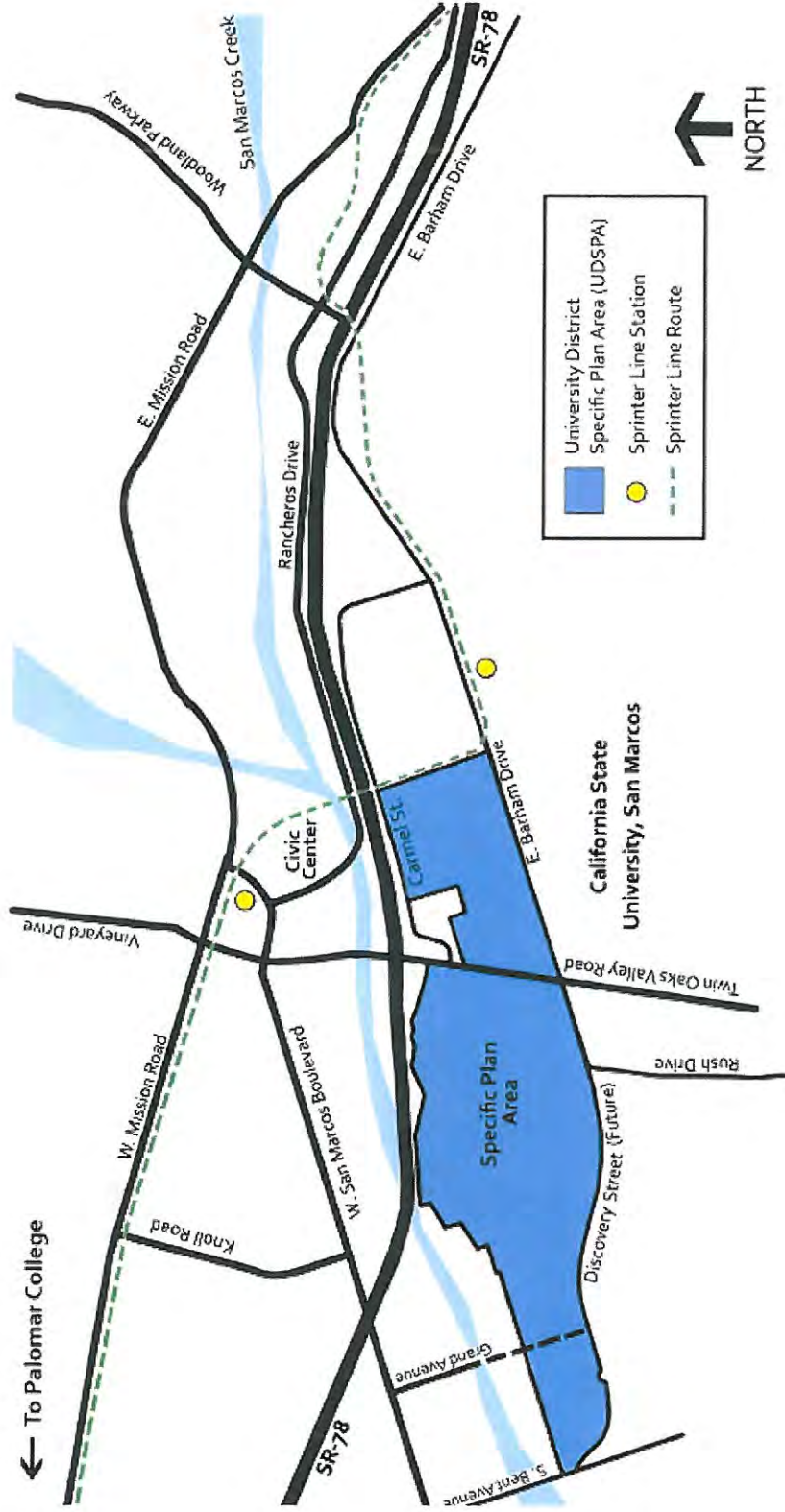
## 2.0 PROJECT DESCRIPTION

Figure 1a. Project Site and Vicinity



## 2.0 PROJECT DESCRIPTION

Figure 1b. Specific Plan Area



### 2.4 PROJECT DESCRIPTION

#### Project Objectives

The project objectives of the Specific Plan Amendment have not been altered from the original Specific Plan, and are as follows:

- Design a systematic plan for providing infill mixed-use development in Smart Growth Area No. 3 identified in the Regional Comprehensive Plan.
- Utilize existing transit corridors, such as State Route (SR 78), and major roads, such as Twin Oaks Valley Road and Barham Drive/Discovery Street, to concentrate development in areas of available infrastructure and minimize urban sprawl.
- Create a “university village” urban core that responds to CSUSM needs for student and faculty housing, commercial shopping, entertainment, visitor accommodations, and business/administrative conference centers.
- Develop a commercial center that provides retail-serving needs due to its central location in North County San Diego and close proximity to SR 78.
- Create a true mixed-use center that provides a variety of housing, retail, employment, hotel and entertainment options in a pedestrian-oriented, walkable environment to reduce the dependence on automobiles, thus fulfilling the goals of Senate Bill (SB) 375.
- Achieve land use intensities that support smart growth concepts and utilize available mass-transit, such as the SPRINTER, while creating opportunities for alternative transportation modes, such as shuttles.
- Implement a strategic Transportation Demand Management (TDM) plan, which supports “park once” strategies to encourage alternate modes of travel.
- Incorporate Low Impact Development (LID) features, as a sustainable approach to storm water management for the use of natural systems for permeation, filtration, storage, and evapotranspiration.
- Incorporate Leadership in Energy and Environmental Design (LEED) and/or other “green building” concepts and standards into the Specific Plan and implementing Form Based Code.
- Provide quality outdoor spaces for recreation, walking, and community gatherings.
- Provide a variety of housing opportunities, including affordable housing units.
- Enhance employment opportunities by identifying areas for commercial and office uses within the Specific Plan area.
- Preserve sensitive habitats associated with San Marcos Creek.
- Maintain an option for an elementary school within the Specific Plan area.

#### Land Use and Development Intensity

The UDSP includes a diverse mix of land uses that will provide an assortment of amenities for residents and visitors upon full build-out. No land use changes are proposed in the Amendment.

## 2.0 PROJECT DESCRIPTION

The conceptual land use plan allows for transfer of land use totals (i.e., use square-footage, number of dwelling units) between the west and east sides of the project (separated by Twin Oaks Valley Road), provided there is no overall increase to the total approved development densities.

**Table 1** shows the land use intensities proposed in the Specific Plan Amendment, and **Table 2** details the differences between the adopted Specific Plan and the proposed Specific Plan Amendment, by land use. **Figure 2** presents the proposed site plan under the Specific Plan Amendment

**Table 1. Proposed Land Use Intensities under Specific Plan Amendment**

| Land Use Description          | West Side of<br>Twin Oaks Valley Road | East Side of<br>Twin Oaks Valley Road | Total        |
|-------------------------------|---------------------------------------|---------------------------------------|--------------|
| Mixed-Use Residential         | 2,070 units                           | 530 units                             | 2,600 units  |
| Student Housing               | -                                     | 800 units                             | 800 units    |
| Hotel                         | 200 rooms                             | 250 rooms                             | 450 rooms    |
| General Office                | 452,000 s.f.                          | 200,000 s.f.                          | 652,000 s.f. |
| Medical Office                | 200,000 s.f.                          | 100,000 s.f.                          | 300,000 s.f. |
| Mixed-Use Retail/Commercial   | 100,000 s.f.                          | 600,000 s.f.                          | 700,000 s.f. |
| Civic/Community               | 30,000 s.f.                           | -                                     | 30,000 s.f.  |
| Parks/Urban Open Space        | 20.00 acres                           | 5.00 acres                            | 25.00 acres  |
| Urban Trails/Paths            | 1.38 miles                            | -                                     | 1.38 miles   |
| Habitat Preservation          | 15.10 acres                           | -                                     | 15.10 acres  |
| Public Streets <sup>(1)</sup> | 15.00 acres                           | 10.00 acres                           | 25.00 acres  |

**Note:** 1. Includes public streets, adjacent sidewalks, and segments of Twin Oaks Valley Road within project boundary.

**Table 2. Comparison of Land Use Intensities (Adopted Specific Plan vs. Specific Plan Amendment)**

| Land Use Description        | Adopted Specific Plan | Proposed Specific Plan<br>Amendment | Difference                      |
|-----------------------------|-----------------------|-------------------------------------|---------------------------------|
| Mixed-Use Residential       | 2,600 units           | 2,600 units                         | ---                             |
| Student Housing             | 800 units             | 800 units                           | ---                             |
| Hotel                       | 450 rooms             | 450 rooms                           | ---                             |
| General Office              | 638,000 s.f.          | 652,000 s.f.                        | + 14,000 s.f.<br>2.2% increase  |
| Medical Office              | 300,000 s.f.          | 300,000 s.f.                        | ---                             |
| Mixed-Use Retail/Commercial | 1,000,000 s.f.        | 700,000 s.f.                        | (300,000 s.f.)<br>30% reduction |
| Civic/Community             | 30,000 s.f.           | 30,000 s.f.                         | ---                             |
| Parks/Urban Open Space      | 25.33 acres           | 25.60 acres                         | + 0.30 acre<br>1.1% increase    |
| Urban Trails/Paths          | 1.38 miles            | 1.38 miles                          | ---                             |
| Habitat Preservation        | 15.10 acres           | 15.10 acres                         | ---                             |
| Public Streets              | 26.74 acres           | 25.00 acres                         | (1.74 acres)<br>6.5% reduction  |

As shown in Table 2, no changes to intensity would result in the following Land Use types: Mixed Use Residential, Student Housing, Hotel, Medical Office, Civic/Community, Urban Trails/Paths, or Habitat Preservation.

## 2.0 PROJECT DESCRIPTION

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The Amendment proposes an overall increase in General Office square footage of 14,000 square feet, a reduction of Mixed-Use Retail / Commercial of 300,000 square feet, an increase of Parks and Urban Open Space of 0.30 acres, and a reduction of Public Streets by 1.74 acres.

Under the UDSP and the proposed Specific Plan Amendment, a K-6 elementary school/park is permitted. If the school is constructed, there will be no resulting decrease in the allowed number of Mixed-Use Residential dwelling units. The units that would have been constructed in the area of the potential school site will be absorbed into the residential dwelling units proposed elsewhere within the project boundary. Should the San Marcos Unified School District decide that the school facility is not needed, this area would revert to residential without need to amend the Specific Plan.

### **Transportation and Circulation**

**Figures 3a and 3b** depict the circulation network under the proposed Specific Plan Amendment and the network under the UDSP. Under the proposed Specific Plan Amendment, the project results in reconfiguration of some roadways both east and west of Twin Oaks Valley Road.

The project will continue to include construction of a new bridge crossing over the SR 78 freeway to provide direct access to the site from San Marcos Boulevard between SR 78 and Twin Oaks Valley Road. The proposed bridge crossing will be generally aligned with Westlake Drive, and a new signalized four-way intersection will be constructed at San Marcos Boulevard / Westlake Drive.

An internal street network will be built throughout the project site, with access intersections provided on Discovery Street, Barham Drive, and Twin Oaks Valley Road. The project will also provide a third westbound lane on Barham Drive along the project frontage between Twin Oaks Valley Road and the eastern boundary of the project site.

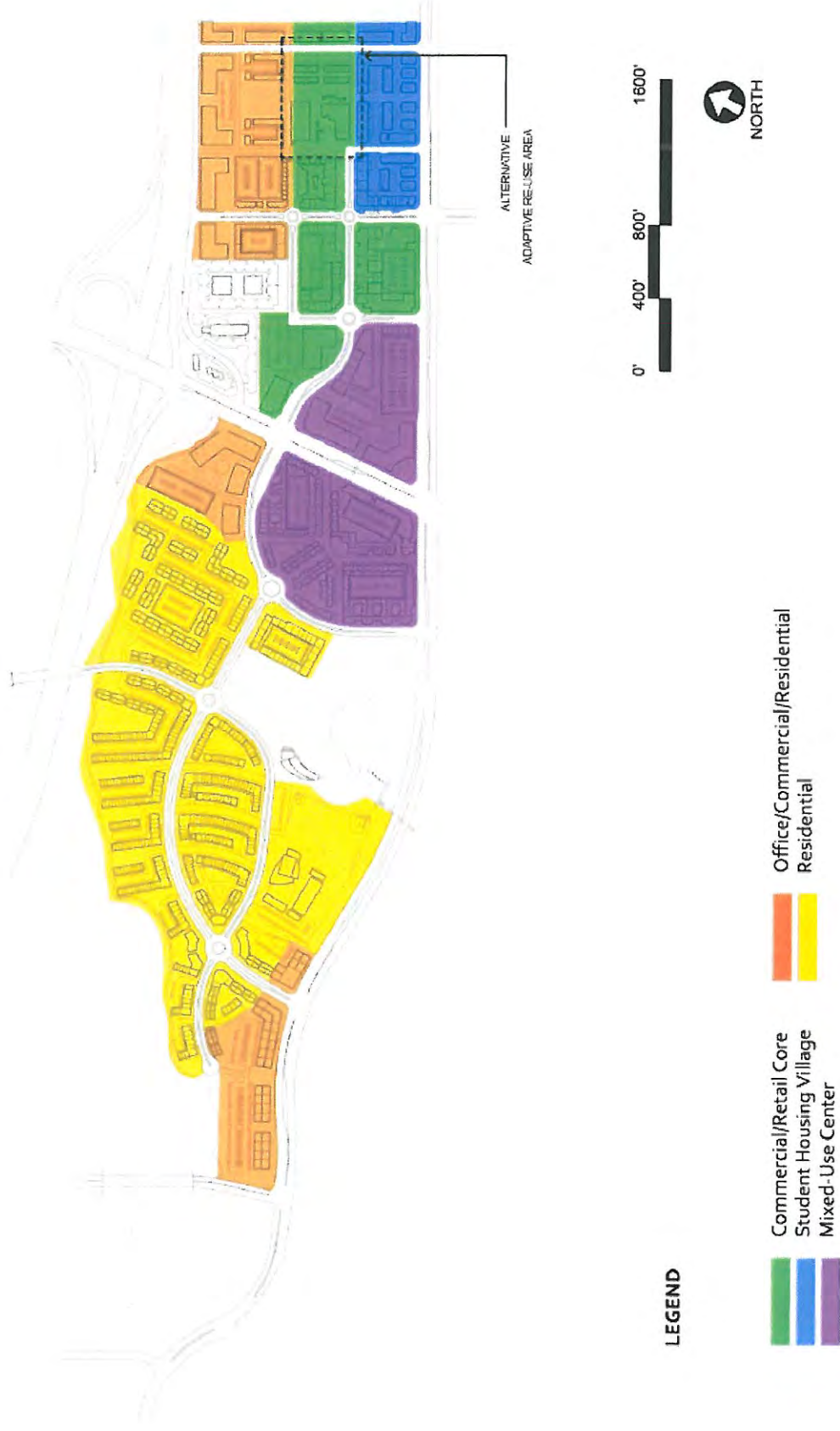
### **Low Impact Development Strategy**

Low Impact Development (LID) is a storm water management approach that seeks to preserve or mimic natural drainage systems and retain storm water run-off on-site. LID presents the environmental benefits of restoring stream quality in watersheds, as well significant economic benefits that come from intelligent, dual-purpose design of functional landscape and hardscape treatments. LID satisfies National Pollutant Discharge Elimination System (NPDES) requirements for managing stormwater, including capturing storm water run-off at the source, detaining and retaining a portion of the peak storm water run-off flow, and treating the captured flow through natural filtration systems (e.g., constructed wetlands, underground basins, grassy areas with opportunities for percolation, etc.).

The Specific Plan Amendment is updating the standards for compliance with the City of San Marcos Standard Urban Stormwater Mitigation Plan (SUSMP). Developers may still choose to use flow through planters, permeable paving, and bio-retention to satisfy the LID requirements.

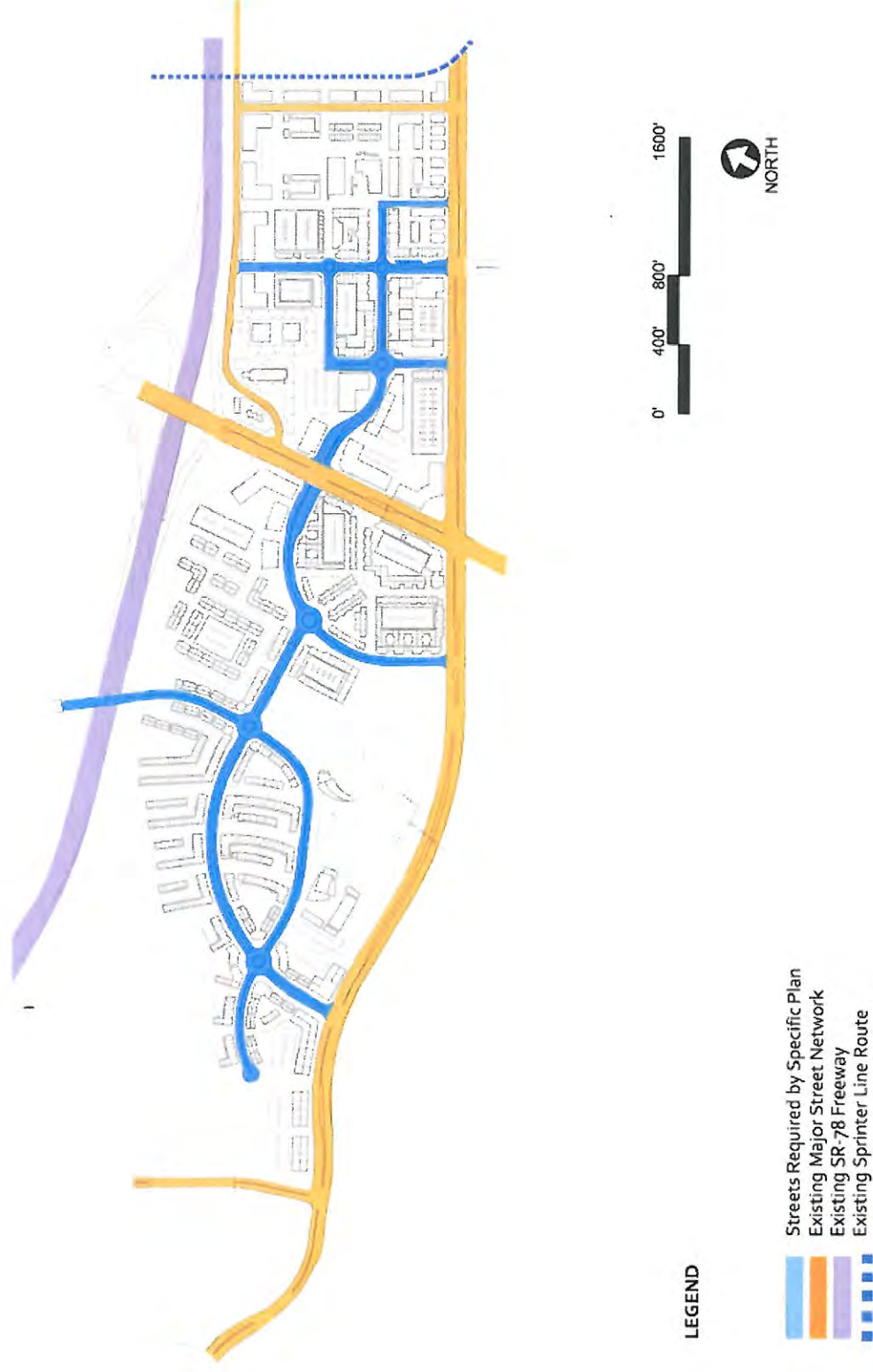
## 2.0 PROJECT DESCRIPTION

Figure 2. Site Plan



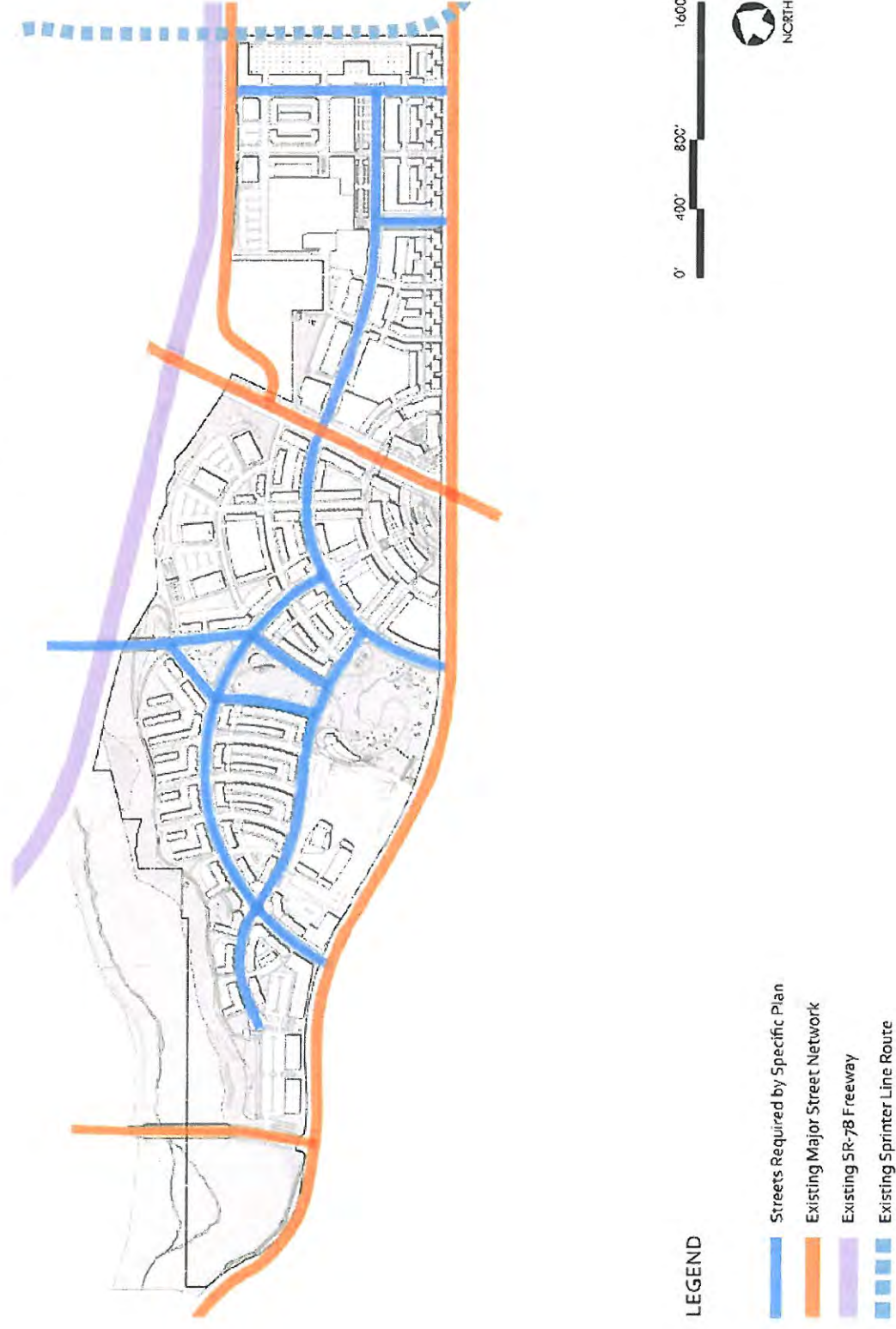
## 2.0 PROJECT DESCRIPTION

Figure 3a. Circulation Network – Proposed Specific Plan Amendment



## 2.0 PROJECT DESCRIPTION

Figure 3b. Circulation Network – Adopted Specific Plan



## 2.0 PROJECT DESCRIPTION

### Urban Open Space

The urban open space concept seeks to create a distinct community character and neighborhood feel that is reinforced by the University District's relationship to a larger open space network of parks and trails. The conceptual landscape plan provides for an extension of the existing urban trail system in San Marcos. The urban parks, trails, and gathering plazas within University District serve the dual purpose of providing open space amenities, as well as extensive and integrated storm water management.

The Specific Plan Amendment updates the conceptual location of all proposed public and private parks, public gathering plazas, and preserved natural open spaces. **Figures 4a and 4b** depict the urban open space configuration under the proposed Specific Plan Amendment and the network under the adopted Specific Plan.

**Table 3** shows the acreage differences between the UDSP and the proposed Specific Plan Amendment for urban plazas and urban open space/parks. Overall, the total open space is increasing by 0.30 acres. The overall acreage for Urban Plazas would be reduced while the overall acreage for Urban Parks would be increased. The amount of Trails and Paths remains constant.

**Table 3. Urban Open Space Statistical Summary**

| Type                    | Adopted Specific Plan | Specific Plan Amendment | Difference          |
|-------------------------|-----------------------|-------------------------|---------------------|
| Urban Plazas            | 7.96 acres            | 4.5 acres               | -3.46 acres         |
| Urban Parks             | 17.37 acres           | 21.13 acres             | +3.76 acres         |
| <b>Total Open Space</b> | <b>25.33 acres</b>    | <b>25.63 acres</b>      | <b>+ 0.30 acres</b> |

### Form Based Code

The purpose of the Form Based Code in the Specific Plan is to provide a set of development regulations and procedures for property owners or developers to implement the envisioned future for the University District project. The code establishes clear design standards while allowing flexibility in future land uses to account for adjustments in market conditions.

Minor updates have been made to the street types, open space standards, and building type standards within the Form Based Code.

#### **General Public Space Updates**

General Public Space standards have been altered slightly in the Amendment. The updates include altering the canopy shade tree planting requirements for the East Urban Plaza and updating the Knoll Park and Neighborhood Green section to reflect the combination of areas in the Open Space plan.

#### **Building Type Standards Updates**

Development Standards for the following Building Types have been altered slightly in the Amendment. The updates include:

- Allowing residential units on the ground floor on streets other than Main Street in Mixed-Use Building A.
- Allowing retail, general service, health service, dining, office, live-work, and residential uses on the ground floor of all streets except Main Street in Mixed-Use Building B.
- In the Townhomes/Flats and Creek Side Townhomes/Flats Types, the open space requirements were updated to reflect the changes made in the Open Space Chapter of the Specific Plan Amendment.

## 2.0 PROJECT DESCRIPTION

Figure 4a. Urban Open Space Comparison – Proposed Specific Plan Amendment



- Bioretention/Green Belt
- Park/Slope
- Open Space
- Plaza

Note: common usable open space amenities as described herein shall be required of residential developments west of Twin Oaks Valley Road at the time of project-specific design and site development permits

## 2.0 PROJECT DESCRIPTION

Figure 4b. Urban Open Space Comparison – Adopted Specific Plan



## 2.0 PROJECT DESCRIPTION

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Development Standards for the Alternative "Special Mixed-Use Area" were added. The Alternative Special Mixed-Use Area is generally located along Main Street east from Redel Road to Industrial Street. The buildings in this area are primarily conceived of as adaptive re-use of the existing warehouse and industrial buildings as unique residential, live/work, specialty retail, bar and restaurant, entertainment, and beer and wine tasting venues. Under the proposed Specific Plan Amendment, the re-use of existing buildings on site is encouraged. Additionally, new buildings that take cues from vernacular industrial or agricultural buildings and employ sustainable design features or use recycled or salvaged materials shall also be allowed.

Existing buildings and structures that are retained as part of the Special Mixed-Use area shall be considered conforming buildings. Since many of the existing buildings and lots in this area will not comply with lot size and building placement regulations for other building types in the Form Based Code, there are no specific standards for building placement or lot size within this area. Rather, it is encouraged that each building be thoughtfully planned to engage with adjacent structures, sidewalks, and public spaces to create interesting and dynamic spaces.

### **District Signage/Public Art**

Having a visibly unique identity is essential to creating an active urban center, especially within a City's downtown core. People relate to the identity of different places based on themes, natural context, urban form, and special events. This identity can be achieved through the use of public art, landscaping, and by creating a hierarchy of sign types that are linked by a consistent theme. Sign types will range in scale from District identity signs scaled for visibility by passing motorists on SR 78, down to smaller way-finding signs scaled for individual pedestrians. The Amendment does not propose any changes to the sign types or requirements or art in public places program. The Amendment proposes a change to the sign locations map to reflect the updated street layout.

### **Infrastructure, Utilities, and Public Services**

The UDSP discusses the existing and proposed water system, sewer facilities, flood control and storm drainage, solid waste disposal, and other public services including schools, fire protection, police protection, and libraries. The Amendment proposes changes to the water facilities. The descriptions of existing water facilities were updated to include more details about what size water lines currently exist in the project area. The description of proposed water facilities system improvements that are necessary to serve the project area were updated to include descriptions of the sizes of water pipes necessary to serve the project. The proposed water facilities map was updated to reflect the changes to the road network.

### **Project Grading**

The 2009 FEIR included an analysis of the proposed grading and assumed up to 2,316,000 cubic yards (cy) of cut and fill, with approximately 587,500 cy of this being import fill material.

In 2011, a CUP for a rock crusher was issued. This CUP also permitted a change in the grading plans in the central portion of the project site which resulted in a total earthwork amount of approximately 2,772,700 cy of cut and 1,703,500 cy of fill, leaving an export volume of approximately 1,069,200 cy for the overall Specific Plan Area.

## 2.0 PROJECT DESCRIPTION

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Under the Specific Plan Amendment, the grading quantities would balance onsite and include approximately 1,473,000 cubic yards of cut and fill, with no import or export. Compared to the approved Specific Plan, the project reduces the amount of earthwork activity by approximately 36 percent. Compared to the grading plan considered as part of the 2011 Conditional Use Permit process, this represents a 46 percent reduction and eliminates large amount of materials export.

**Figure 5** depicts a comparison of the finished grades under the original grading plan considered in the Specific Plan and the grading plan considered as part of the Specific Plan Amendment. The changes focus on the central portion of the project site. Areas in blue and purple depict areas that will have a higher finished elevation than was considered in the FEIR. Areas in orange and red depict areas that will have a lower finished elevation compared to what was considered in the FEIR.

### **Tentative Subdivision Map or Vesting Map (14-002)**

The project applicant is requesting approval of a Tentative Subdivision Map (TSM 14-002) to consolidate 25 existing lots, located on 25 acres, into 18 new lots ranging from 0.09 acres to 2.08 acres for future mixed use development. The area associated with the Tentative Subdivision Map or Vesting Map is located on the east side of Twin Oaks Valley Road within the UDSP area.

### **Conditional Use Permit (14-006)**

The project applicant is also requesting a Conditional Use Permit (CUP) for use of a temporary rock crusher facility. The temporary rock crusher facility would include the following components: a jaw crusher and associated screening; loading and power generation equipment; and a stacker, cone crusher and conveyers. The rock crusher would stay in one location on the project site during the duration of the crushing activity. Cone crushers and blend gates would be up to 22 feet in height, conveyors would be 33 feet in height and material storage areas would be up to 30 feet high. The location of the proposed crusher is the same as what was considered in the 2011 Mitigated Negative Declaration for the Rock Crusher Conditional Use Permit.

The primary difference between this CUP and previously-approved CUP is the modification to the grading plan and the use of a smaller rock crusher.

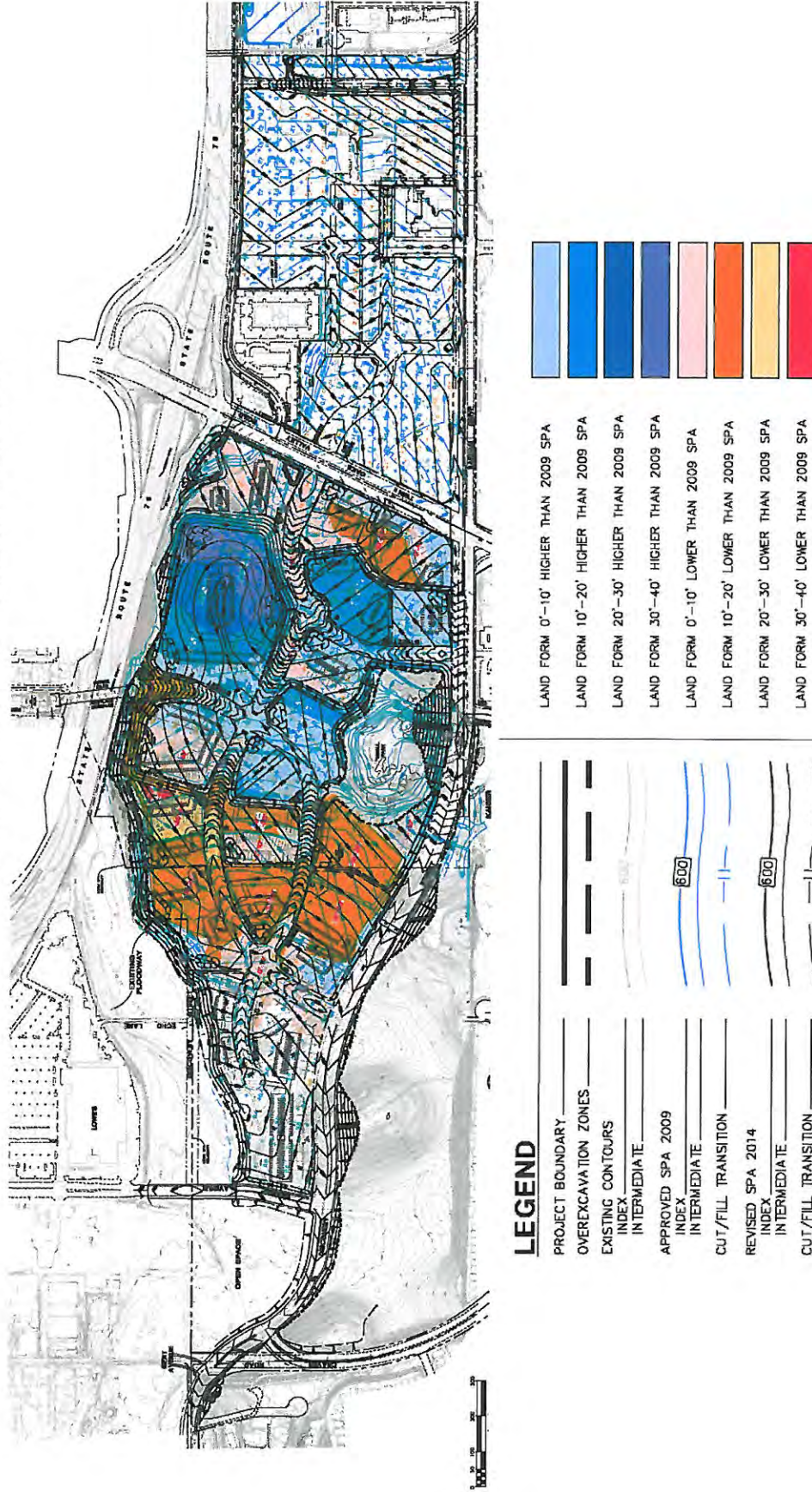
## 2.5 EXISTING CONDITIONS

The UDSP FEIR included a summary of existing on-site conditions. Conditions within the limits of the Specific Plan area have not substantially changed since certification of the FEIR with the exception of the following:

- Development of The Quad at CSUSM on the east side of Twin Oaks Valley Road within the UDSP area. The development includes 174 student housing units and 40, 353 s.f. of community commercial.

## 2.0 PROJECT DESCRIPTION

Figure 5. Finish Grade Elevation Differences Between Adopted Specific Plan and Proposed Specific Plan Amendment



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## 2.0 PROJECT DESCRIPTION

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### 2.6 FINDINGS AND CONCLUSIONS

Based on the project description contained in Section 2.4 of this Initial Study, each of the issues addressed in the UDSP FEIR, as well as each of the issues contained in the checklist presented in Section 3.0 of this document, have been evaluated, leading to the following findings and conclusions:

- The proposed Specific Plan Amendment results in an overall reduction in development.
- The proposed Specific Plan Amendment results in a reduction in traffic generation (21,817 ADT/ 19 percent reduction).
- The proposed Specific Plan Amendment reduces operational noise and air/greenhouse gas (GHG) emissions due to a reduction of vehicular trips generation (estimated 19 percent reduction).
- The proposed Specific Plan Amendment reduces the amount of grading which results in a corresponding reduction in construction-related noise and air/GHG emissions.
- The proposed Specific Plan Amendment maintains the mixed-use and transit-oriented nature of UDSP providing multi-modal transportation options (e.g., pedestrian, bicycles, SPRINTER, bus/transit).
- The FEIR adequately addressed the impacts of the proposed Specific Plan Amendment.

Thus, none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

1. *The change in the project analyzed in the FEIR for the UDSP is substantial.* Substantial changes in the project are those that would require "major revisions of the previous EIR ... due to the involvement of new significant environmental effects, or a substantial increase in the severity of previously identified significant effects." As noted above, the proposed Specific Plan Amendment will not result in new significant impacts or a substantial increase in the severity of previously identified significant effects.
2. *The circumstances under which the project is undertaken have substantially changed.* Substantial changes in the circumstances under which the project is being undertaken are defined as those that would "require major revisions of the previous EIR ... due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects." The only changes required in the FEIR to address the impacts of the proposed Specific Plan Amendment are to include the project description contained in this Addendum as part of the FEIR project description.
3. *New information of substantial importance, which was not known and could have not been known, with the exercise of reasonable diligence at the time the previous EIR was certified, shows:*
  - "The project will have one or more significant effects not discussed in the previous EIR...;
  - Significant effects previously examined will be substantially more severe than shown in the previous EIR;

## 2.0 PROJECT DESCRIPTION

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- Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative."

As noted above, there is no evidence that any of these conditions exist.

Section 15164 of the State CEQA Guidelines states that an Addendum to an EIR shall be prepared "if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Since none of the conditions of Section 15162 of the State CEQA Guidelines occur, an Addendum to the UDSP FEIR is the appropriate form of environmental documentation under CEQA for the proposed project.

### 3.0 INITIAL STUDY

#### 3.1 ENVIRONMENTAL CHECKLIST FORM

The following pages contain the Environmental Checklist Form (Form) for the proposed project. The Form is marked with findings as to the environmental effects of the project. A checked box (■) in columns 1, 2, or 3 shall require additional environmental analysis in the form of a supplemental or subsequent EIR. A checked box in columns 4, 5, or 6 shall require preparation of a mitigated negative declaration, a negative declaration, or an addendum.

As explained in Section 1.0, this analysis has been undertaken, pursuant to the provisions of CEQA, to provide the City of San Marcos with the factual basis for determining, based on the information available, the form of environmental documentation the project warrants. The basis for each of the findings listed in the attached Form is explained in Section 3.2, Environmental Analysis and Explanation of Checklist Responses.

#### ENVIRONMENTAL CHECKLIST FORM

- |                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Project Title:</b>                                   | University District Specific Plan Amendment                                                                                                                                                                                                                                                                                                                                                                              |
| <b>2. Lead Agency Name and Address:</b>                    | City of San Marcos<br>1 Civic Center Drive<br>San Marcos, CA 92069                                                                                                                                                                                                                                                                                                                                                       |
| <b>3. Contact Person:</b>                                  | Mr. Garth Koller, Principal Planner<br>Tel: (760) 744-1050 ext. 3231<br>GKoller@san-marcos.net                                                                                                                                                                                                                                                                                                                           |
| <b>4. Project Location:</b>                                | The 195-acre project site is situated in the heart of San Marcos, with parcels located on both the east and west sides of Twin Oaks Valley Road. The site is bounded by State Route 78 (SR 78) and San Marcos Creek on the north and Barham Drive and Discovery Hills on the south. California State University San Marcos (CSUSM) is located adjacent to the southeast section of the University District project site. |
| <b>5. Project Applicant:</b>                               | Urban Village San Marcos, LLC<br>3525 Del Mar Heights Road #246<br>San Diego, CA 92130                                                                                                                                                                                                                                                                                                                                   |
| <b>6. Existing and Proposed General Plan Designations:</b> | Existing: Specific Plan<br>Proposed: Specific Plan                                                                                                                                                                                                                                                                                                                                                                       |
| <b>7. Existing and Proposed Zoning:</b>                    | Existing: Specific Plan<br>Proposed: Specific Plan                                                                                                                                                                                                                                                                                                                                                                       |

### 3.0 INITIAL STUDY

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- 8. Project Description:** The project is an amendment to the University District Specific Plan (UDSP). The primary changes focus on an overall reduction of development intensity, changes to the grading plan, reconfiguration of some of the internal streets and urban opens space areas within the UDSP area, changes in the proposed stormwater approach to meet current regulatory requirements, and the allowance of adaptive reuse of some existing buildings.
- 9. Existing and Proposed Surrounding Land Use and Setting:** The UDSP area is located near existing residential and commercial uses and is adjacent to CSUSM. The UDSP is adjacent to the San Marcos Creek Specific Plan (Creek District) area which proposes a mix of residential, commercial and office uses.
- 10. Public Agencies Whose Approval is Required (e.g., permits, financing approval, or participation agreement):** City of San Marcos

### 3.0 INITIAL STUDY

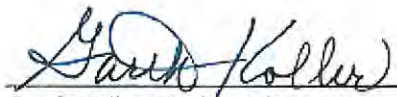
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#### Determination

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 require only minor revision 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 SUPPLEMENTAL EIR shall be prepared
- The City finds that the significant effects that would result from the proposed project have been addressed in an earlier EIR, 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 University District Specific Plan project FEIR shall be prepared.

  
Garth Koller, Project Planner

Date: April 21, 2014

## 3.0 INITIAL STUDY

### 3.2 ENVIRONMENTAL ANALYSIS CHECKLIST

See Section 3.3 of a full discussion of the conclusions in the 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 EIR | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------|
| <b>1. AESTHETICS</b> – Would the 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 AND FORESTRY 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. 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 project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resource 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 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 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 51140(g))?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <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 land use?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input type="checkbox"/>                                                               | <input checked="" type="checkbox"/> |

### 3.0 INITIAL STUDY

| 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 EIR | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------|
| 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 type="checkbox"/>                                                                         | <input type="checkbox"/>                                                               | <input checked="" 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 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 type="checkbox"/>                                                                         | <input checked="" 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 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 type="checkbox"/>                                                               | <input checked="" type="checkbox"/> |
| <b>4. BIOLOGICAL RESOURCES</b> – 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 Wildlife 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 Wildlife 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"/>            |

### 3.0 INITIAL STUDY

| 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 EIR | No Impact                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|--------------------------|
| 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"/> |
| <b>5. CULTURAL RESOURCES – Would the 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 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"/> |

### 3.0 INITIAL STUDY

| 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 EIR | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------|
| 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 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"/>            |
| 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 type="checkbox"/>                                                               | <input checked="" type="checkbox"/> |
| <b>7. GREENHOUSE GAS EMISSIONS – Would the 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 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 type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/>            |
| <b>8. HAZARDS AND HAZARDOUS MATERIALS – Would the 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"/>            |

### 3.0 INITIAL STUDY

| 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 EIR | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------|
| 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 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 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 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 type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/>            |
| <b>9. HYDROLOGY AND WATER QUALITY – Would the 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) Have a potentially significant adverse impact on groundwater quality or cause or contribute to an exceedance of applicable groundwater receiving water quality objectives or degradation of beneficial uses?                                                                                                                                                                              | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/>            |
| c) 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 preexisting nearby wells would drop to a level which 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"/>            |
| d) 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 which would result in substantial erosion or siltation on- or off-site (e.g., downstream)?                                                                                                                                        | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/>            |

### 3.0 INITIAL STUDY

| 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 EIR | No Impact                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|--------------------------|
| e) Create a significant adverse environmental impact to drainage patterns due to changes in runoff flow rates or volumes?                                                                                                                                                                                                                  | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/> |
| f) 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 which 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"/> |
| g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water 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"/> |
| h) Result in increased impervious surfaces and associated increased runoff?                                                                                                                                                                                                                                                                | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/> |
| i) Result in significant alteration of receiving water quality during or following construction?                                                                                                                                                                                                                                           | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/> |
| j) Result in an increase in pollutant discharges to receiving waters? Consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical storm water pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash). | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/> |
| k) Be tributary to an already impaired water body as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?                                                                                                                                 | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/> |
| l) Be tributary to environmentally sensitive areas (e.g., MSCP, RARE, Areas of Special Biological Significance, etc.)? If so, can it exacerbate already existing sensitive conditions?                                                                                                                                                     | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/> |
| m) Have a potentially significant environmental impact on surface water quality, to either marine, fresh or wetland waters?                                                                                                                                                                                                                | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/> |
| n) Otherwise substantially degrade water quality?                                                                                                                                                                                                                                                                                          | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/> |

### 3.0 INITIAL STUDY

|                                                                                                                                                                                                                                                                                                             | Substantial<br>Change in<br>Project<br>Requiring<br>Major EIR<br>Revisions | Substantial<br>Change in<br>Circumstance<br>Requiring<br>Major EIR<br>Revisions | Information<br>Showing<br>Greater<br>Significant<br>Effects than<br>Previous EIR | New<br>Information<br>Showing<br>Ability to<br>Reduce, but<br>not Eliminate<br>Significant<br>Effects in<br>Previous EIR | Less than<br>Significant<br>Impact/No<br>Changes or<br>Information<br>Requiring<br>Preparation<br>of an EIR | No Impact                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|---------------------------------------------------------------------------------|----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|-------------------------------------|
| <b>ISSUES:</b>                                                                                                                                                                                                                                                                                              |                                                                            |                                                                                 |                                                                                  |                                                                                                                          |                                                                                                             |                                     |
| o) 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 type="checkbox"/>                                                                                    | <input checked="" type="checkbox"/> |
| p) Place within a 100-year flood hazard area structures which 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"/>            |
| q) 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 type="checkbox"/>                                                                                    | <input checked="" type="checkbox"/> |
| r) Inundation by seiche, tsunami, or mudflow?                                                                                                                                                                                                                                                               | <input type="checkbox"/>                                                   | <input type="checkbox"/>                                                        | <input type="checkbox"/>                                                         | <input type="checkbox"/>                                                                                                 | <input type="checkbox"/>                                                                                    | <input checked="" type="checkbox"/> |
| <b>10. LAND USE AND PLANNING – Would the project:</b>                                                                                                                                                                                                                                                       |                                                                            |                                                                                 |                                                                                  |                                                                                                                          |                                                                                                             |                                     |
| a) Physically divide an established community?                                                                                                                                                                                                                                                              | <input type="checkbox"/>                                                   | <input type="checkbox"/>                                                        | <input type="checkbox"/>                                                         | <input type="checkbox"/>                                                                                                 | <input type="checkbox"/>                                                                                    | <input checked="" type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the 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 checked="" type="checkbox"/>                                                                         | <input type="checkbox"/>            |
| <b>11. MINERAL RESOURCES – Would the project:</b>                                                                                                                                                                                                                                                           |                                                                            |                                                                                 |                                                                                  |                                                                                                                          |                                                                                                             |                                     |
| 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 type="checkbox"/>                                                                                    | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?                                                                                                                                      | <input type="checkbox"/>                                                   | <input type="checkbox"/>                                                        | <input type="checkbox"/>                                                         | <input type="checkbox"/>                                                                                                 | <input type="checkbox"/>                                                                                    | <input checked="" type="checkbox"/> |
| <b>12. NOISE – Would the project:</b>                                                                                                                                                                                                                                                                       |                                                                            |                                                                                 |                                                                                  |                                                                                                                          |                                                                                                             |                                     |
| 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"/>            |

### 3.0 INITIAL STUDY

| 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 EIR | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------|
| c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                                                                                                                                                                  | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/>            |
| d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                                                                                                                                                      | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input 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 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 type="checkbox"/>                                                               | <input checked="" type="checkbox"/> |
| f) For a 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 type="checkbox"/>                                                               | <input checked="" type="checkbox"/> |
| <b>13. POPULATION AND HOUSING – Would the project:</b>                                                                                                                                                                                                                                                                                                                                                    |                                                             |                                                                  |                                                                   |                                                                                                  |                                                                                        |                                     |
| 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 – Would the project:</b>                                                                                                                                                                                                                                                                                                                                                           |                                                             |                                                                  |                                                                   |                                                                                                  |                                                                                        |                                     |
| 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"/>            |

### 3.0 INITIAL STUDY

| 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 EIR | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------|
| 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"/>            |
| <b>15. RECREATION – Would the 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 type="checkbox"/>                                                               | <input checked="" type="checkbox"/> |
| <b>16. TRANSPORTATION/TRAFFIC – Would the project:</b>                                                                                                                                                                                                                                                                                                                                                   |                                                             |                                                                  |                                                                   |                                                                                                  |                                                                                        |                                     |
| a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant circulation systems, including but not limited to intersections, streets, highways and freeways, pedestrian, bicycle paths and mass transit? | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/>            |
| b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, other standards established by the county congestion management agency for designation 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 type="checkbox"/>                                                               | <input checked="" 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 type="checkbox"/>                                                               | <input checked="" type="checkbox"/> |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease performance of safety of such facilities?                                                                                                                                                                                                                       | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input type="checkbox"/>                                                               | <input checked="" type="checkbox"/> |

### 3.0 INITIAL STUDY

| 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 EIR | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------|
| <b>17. UTILITIES AND SERVICE SYSTEMS – Would the 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 type="checkbox"/>                                                               | <input checked="" type="checkbox"/> |
| 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 type="checkbox"/>                                                               | <input checked="" type="checkbox"/> |
| <b>18. MANDATORY FINDINGS OF SIGNIFICANCE</b>                                                                                                                                                                                                                                                                                                                                                                                                            |                                                             |                                                                  |                                                                   |                                                                                                  |                                                                                        |                                     |
| a) Does the 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"/>            |

### 3.0 INITIAL STUDY

| 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 EIR | No Impact                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|--------------------------|
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)                                                                                                                                                     | <input type="checkbox"/>                                    | <input type="checkbox"/>                                         | <input type="checkbox"/>                                          | <input type="checkbox"/>                                                                         | <input checked="" type="checkbox"/>                                                    | <input type="checkbox"/> |
| c) Does the 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"/> |
| <b>19. EARLIER ANALYSES</b><br><br>Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR (Section 15063[c][3][D]). <ul style="list-style-type: none"> <li>• <i>University District Specific Plan Final Environmental Impact Report</i>. 2009. (SCH No. 2008101083)</li> <li>• <i>University District Rock Crusher Conditional Use Permit</i>. 2011. (SCH No. 2011081083)</li> </ul> |                                                             |                                                                  |                                                                   |                                                                                                  |                                                                                        |                          |

### 3.3 DISCUSSION OF THE ENVIRONMENTAL CHECKLIST FORM RESPONSES

The following Initial Study Environmental Checklist Form substantiation provides a summary of the findings of the City of San Marcos.

#### 1. Aesthetics – Would the project:

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

**FEIR Conclusion: Less than Significant.** The FEIR identified San Marcos Creek as the primary visual amenity on the project site and that the site did not support any primary or secondary ridgelines. The FEIR concluded (page 3.1-33) that the UDSP project would not impact views of San Marcos Creek or impact views of primary or secondary ridgelines. Impacts to scenic vistas were considered less than significant and no mitigation measures were proposed.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint of the Specific Plan analyzed in the UDSP FEIR. The range of building heights remains the same as the UDSP (18 feet/one story to 90 feet/7 stories) under the proposed Specific Plan Amendment. These heights are consistent with what was analyzed in the FEIR.

Under the Specific Plan Amendment, a modified grading plan is proposed for the central portion of the site. Overall grading quantities will be reduced, but there are some changes in the finished grade elevations, resulting in higher elevations in a limited area near SR 78 (Figure 5). These elevation changes do not result in any adverse impacts to scenic vistas and there are no new impacts.

**Finding:** There are no changes or new information associated with this project that would require the preparation of an EIR.

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

**FEIR Conclusion: Less than Significant.** SR 78 is designated as a view corridor by the City. The FEIR (page 3.1-34) concluded that there are no significant trees, rock outcroppings or historic buildings located within the view corridor of SR 78. There are a few rock outcroppings that are associated with the knoll in the southern portion of the UDSP plan area; however, the majority of the rock outcrop features will be retained and incorporated in the Knoll Park as part of the recreational amenities of the UDSP. The FEIR analysis also concluded that there are no state scenic highways located in the project area, although the City has designated SR 78 as a view corridor to surrounding ridgelines.

**Discussion of the Specific Plan Amendment:** Development under the Specific Plan Amendment would still occur within the overall footprint analyzed in the FEIR. However, under the Specific Plan Amendment, the proposed grading and circulation network have been modified to retain more of the knoll area in the southern portion of the project area, and the Knoll Park would be expanded. See Chapter 4 of the Specific Plan for more information on the Knoll Park.

The revised grading plan reduces the overall amount of cut and fill. The grading plan revisions also result in a change in the finished grade in some areas. Figure 5 depicts the changes in finished grade elevation between the UDSP and the proposed Specific Plan Amendment. As

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shown in Figure 5, these changes are limited to a small area near SR 78. These elevations range from 20 feet to 40 feet higher than the UDSP.

**Figures 6a, 6b, and 6c** present a cross section map and a cross section for westbound and eastbound viewers on SR 78 to compare the elevation differences between the two plans. As shown in Figure 6b, the finished elevation grade will increase from 598 feet to 632 feet at the selected cross section point. Under both the proposed and adopted Specific Plan, up to five stories of development would be visible for westbound motorists on SR 78.

Figure 6c compares the line of sight for eastbound motorists on SR 78. As shown in Figure 6c, the finished elevation grade will increase from 619 to 632 feet at the selected cross section point. Under both the proposed and adopted Specific Plan, up to three stories of development would be visible for eastbound traffic. The changes in the grading plan do not result in a significant difference in the viewer experience from SR 78. Therefore, no new impacts are identified.

**Finding:** There are no changes or new information associated with this project that would require the preparation of an EIR.

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

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.1-34) concluded that the UDSP proposed urban development and new roadways that would alter the existing visual character of the project site. The FEIR also noted that the Specific Plan would introduce new visual amenities to the project site and surroundings. The FEIR concluded that implementation of the UDSP would result in a change in the visual character to the site and surrounding, although this change was not characterized as a degradation. Therefore, a less than significant impact was identified in the FEIR.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment still proposes urban development and new roadways, though there have been some reconfigurations of the internal roadway network. These roadway changes were made to reflect the proposed grading plan. Landscaping would still be required along the roadways. These roadway changes would not result in any changes in visual character or quality that were not already considered in the FEIR.

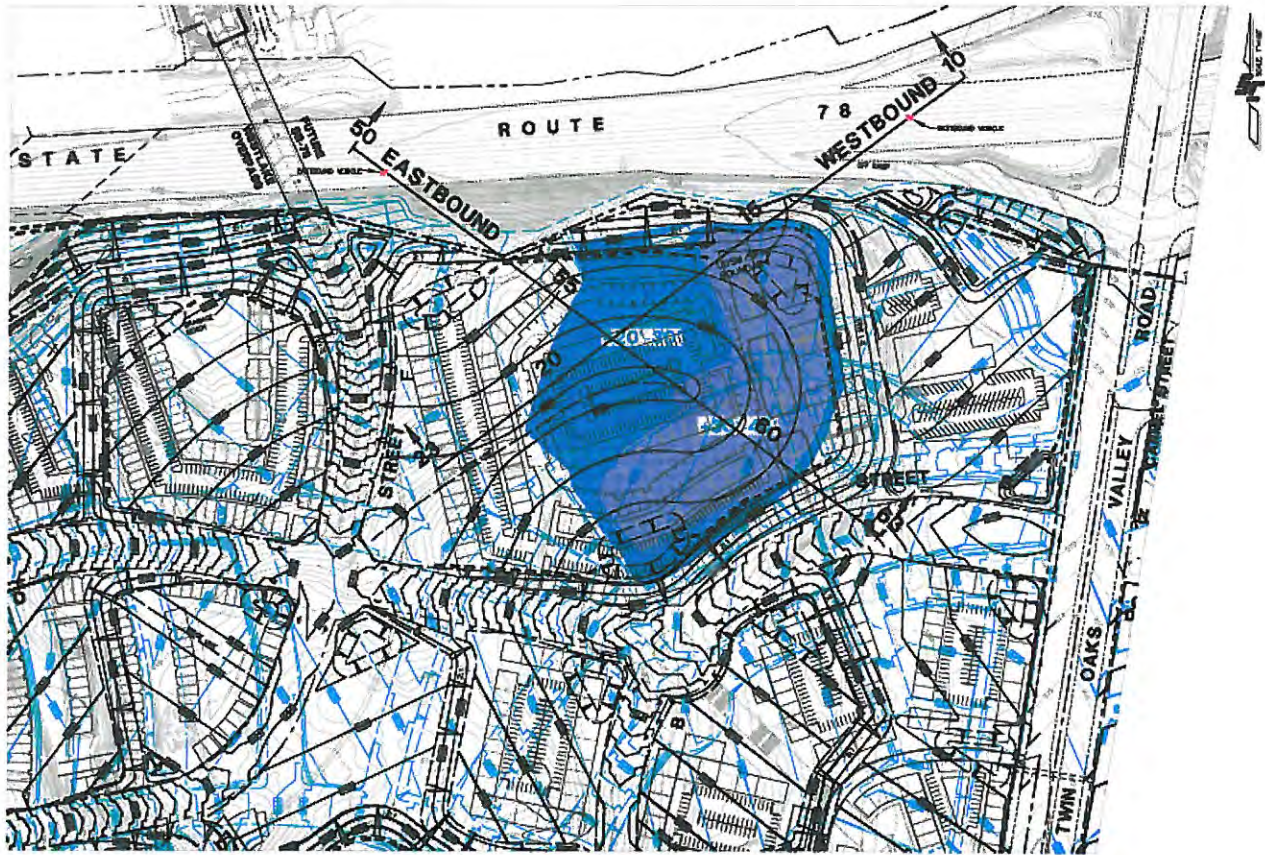
Under the proposed Specific Plan Amendment the building height regulating plan has been modified. The range of building height remains the same as the UDSP (18 feet/one story to 90 feet/7 stories) under the proposed Specific Plan Amendment; however, the maximum heights for some buildings have changed. These changes are a difference of 10 feet (increase or decrease) and would not be considered significant within the overall context of the Specific Plan. See Figure VI.C (Building Height Regulating Plan) in the Specific Plan for more information on the height regulations for each area of the Specific Plan.

The proposed Specific Plan Amendment still includes requirements for a comprehensive landscape plan and specific guidance related to building finishes, treatments and signage. There are no impacts related to visual character associated with the Specific Plan Amendment that were not already disclosed in the FEIR. No new impacts are identified.

**Finding:** There are no changes or new information associated with this project that would require the preparation of an EIR.

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Figure 6a. View Corridor Comparison – Cross Section Location Map



#### LEGEND

|                                        |       |
|----------------------------------------|-------|
| PROJECT BOUNDARY                       | _____ |
| OVEREXCAVATION ZONES                   | _____ |
| EXISTING CONTOURS                      | _____ |
| INDEX                                  | _____ |
| INTERMEDIATE                           | _____ |
| APPROVED SPA 2009                      | _____ |
| INDEX                                  | _____ |
| INTERMEDIATE                           | _____ |
| CUT/FILL TRANSITION                    | _____ |
| REVISED SPA 2014                       | _____ |
| INDEX                                  | _____ |
| INTERMEDIATE                           | _____ |
| CUT/FILL TRANSITION                    | _____ |
| LAND FORM 20'-30' HIGHER THAN 2009 SPA | _____ |
| LAND FORM 30'-40' HIGHER THAN 2009 SPA | _____ |

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Figure 6b. Cross Section Comparison – View from SR 78 Westbound

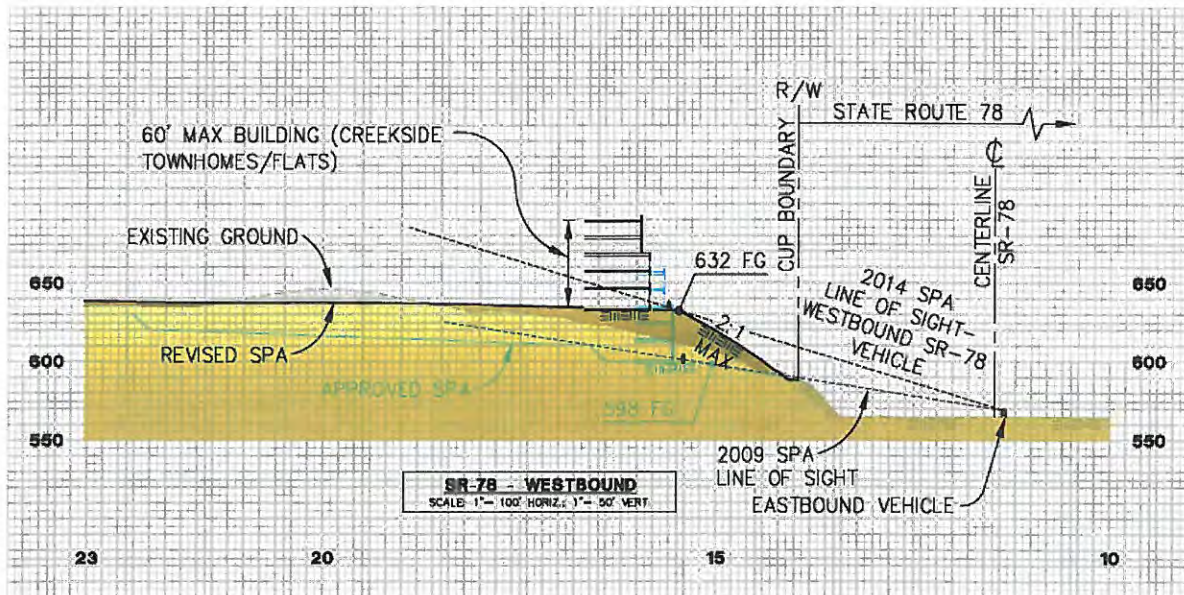
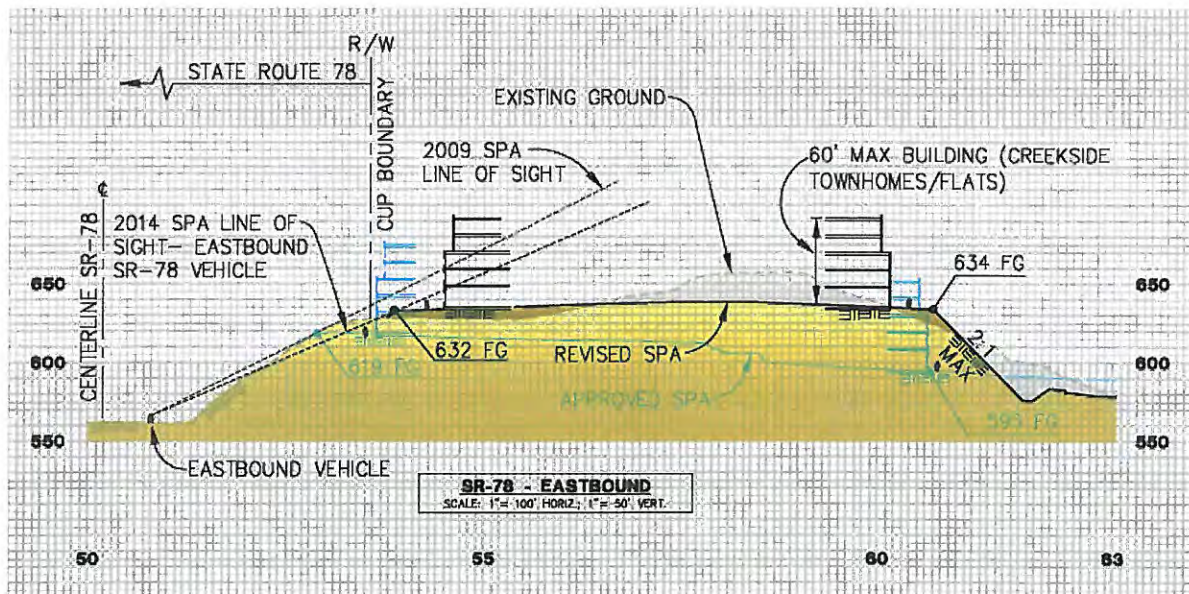


Figure 6c. Cross Section Comparison – View from SR 78 Eastbound



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

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.1-35) concluded that the UDSP project would adhere to the standards set by the City to use downward-directed low-pressure sodium vapor lighting for outdoor lighting to preserve dark-sky conditions. The FEIR analysis concluded that impacts due to substantial light or glare would be considered less than significant.

**Discussion of the Specific Plan Amendment:** Under the Specific Plan Amendment, future development would be required to adhere to the lighting requirements identified in the Specific Plan (Chapter 6, Form Based Code). Per the requirements:

“Proposed street, sidewalk, path and trail lighting shall provide safe levels per City of San Marcos standards, and shall be configured so as not to create a new source of substantial sky-glow, light trespass or glare that would adversely affect nighttime views in San Marcos Creek and its environs. In addition to City ordinances, lighting and luminaries shall comply with all State of California and County light pollution and energy consumption regulations and standards.

“Safe levels of lighting shall be provided using energy efficient lamp technologies such as metal halide, induction lamps, high pressure sodium, LED, or other light sources as approved by the City of San Marcos, along with luminaries designed with shades and cut-offs to eliminate off-site lighting and nighttime sky pollution. Lighting should be directed from edges of view corridors onto paving surfaces, rather than placing fixtures or visible sources of light in the view.”

Thus, future development will continue to be required to adhere to the lighting requirements in the Specific Plan that focus on safety and security while minimizing sky-glow and light trespass that would adversely impact nighttime views. Thus the previous conclusions in the FEIR are still applicable to the proposed Specific Plan Amendment.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

## 2. Agricultural Resources – 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?**

**FEIR Conclusion: No Impact.** The Initial Study of the FEIR determined that the project would not impact agricultural resources. According to the California Department of Conservation’s *San Diego County Important Farmland Map 2006*, portions of the UDSP site are identified as Grazing Land and Farmland of Local Importance. The remaining part of the project area is either unmapped, or identified as urban/built-up land. While historically the UDSP site supported agriculture, there are no existing agricultural operations today. Additionally, while the site contains areas mapped as Farmland of Local Importance and Grazing Land, impacts to these lands would be less than significant, as the viability and feasibility of new or ongoing grazing or agricultural operations at that location are unlikely due to the existing development in the area, including residential uses.

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**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint analyzed in the FEIR and the previous conclusions regarding conversion of farmland in the FEIR are still applicable to the proposed Specific Plan Amendment. Therefore, no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: No Impact.** The FEIR prepared for the UDSP concluded that implementation of the Specific Plan would not have any impacts related to Williamson Act Contracts, since no contracts were associated with the project site (page 5-1).

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint analyzed in the FEIR. Therefore, the previous conclusions regarding Williamson Act Contracts in the FEIR are still applicable to the proposed Specific Plan Amendment. Therefore, no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**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 51140(g))?**

**FEIR Conclusion: No Impact.** The FEIR (page 5-1) determined that there is no forest land or timberland located on the UDSP site.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint analyzed in the FEIR. Therefore, the previous conclusions regarding conflicts with existing zoning for timberland in the FEIR are still applicable to the proposed Specific Plan Amendment. Therefore, no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: No Impact.** The FEIR (page 5-1) determined that there is no forestland on the UDSP site.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint analyzed in the FEIR. Therefore, the previous conclusions regarding the conversion of forest land to non-forest land use is still applicable to the proposed Specific Plan Amendment. Therefore, no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

- 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?*

**FEIR Conclusion: Partially Analyzed/No Impact.** The FEIR (page 5-1) determined that there are no forest lands or farmlands on the UDSP site.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint analyzed in the FEIR. Therefore, the previous conclusions regarding the conversion of Farmland and forest land to non-agricultural and non-forest land use is still applicable to the proposed Specific Plan Amendment. Therefore, no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

### 3. Air Quality – Would the project:

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

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.2-19) concluded that the emissions budget for the UDSP project would be consistent with the established San Diego Air Pollution Control District (SDAPCD) Regional Air Quality Strategies (RAQS). Due to the location of the UDSP it would reduce vehicular trips, encourage use of the SPRINTER train and alternative transportation. The FEIR concluded that impacts were less than significant for this issue area.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment is related to the RAQS and/or the State Implementation Plan (SIP) through the land use and growth assumptions that are incorporated into the air quality planning process. The proposed Specific Plan Amendment development is at an intensity that is lower than the adopted Specific Plan. Therefore, the Specific Plan Amendment would not conflict with or obstruct implementation of the applicable air quality plan and impacts remain less than significant.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Significant and Unmitigated.** The FEIR (page 3.2-30) concluded the project construction emissions would exceed NO<sub>x</sub> emissions, although implementation of mitigation measures AQ-1 through AQ-3 would reduce impacts to less than significant. Project operation emissions of carbon monoxide (CO), oxides of nitrogen (NO<sub>x</sub>), and reactive organic gases (ROG) were identified to have significant and unmitigated impacts. The FEIR required that a Traffic Demand Management program be implemented as part of the UDSP to reduce emissions by over 60 percent.

**Discussion of the Specific Plan Amendment:** Development under the Specific Plan Amendment would result in a reduction of air quality emissions from the UDSP. From a construction emissions perspective, the project reduces the amount of grading and also eliminates the export of earthwork materials. This results in a reduction of construction related emissions.

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From an operational perspective, the Specific Plan Amendment reduces the overall intensity of development. This corresponds to a proportionate reduction in vehicle trips of approximately 19 percent, which also means a proportionate reduction in vehicular emissions. Therefore, the conclusions in the FEIR are still applicable to the Specific Plan Amendment, and no new impacts beyond those identified in the FEIR are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**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)?***

**FEIR Conclusion: Significant and Unmitigated:** The FEIR cumulative air quality analysis (page 3.2-20) concluded that when CO, NO<sub>x</sub> and ROG emissions from operation of the UDSP are considered with the future emissions of the cumulative projects, a significant cumulative impact is identified. The FEIR included mitigation measures to reduce some of the project emissions; however, it was determined that impacts would not be reduced to below a level of significance.

**Discussion of the Specific Plan Amendment:** Development under the Specific Plan Amendment would result in an overall reduction of air quality emissions since there is a reduction in the number of vehicular trips. From a construction emissions perspective, the project reduces the amount of grading and also eliminated the export of earthwork materials. This results in a reduction of construction related emissions.

From an operational perspective, the Specific Plan Amendment reduces the over development intensity within the UDSP. This corresponds to a proportionate reduction in vehicle trips of approximately 19 percent, which also means a proportionate reduction in vehicular emissions. Therefore, the conclusions in the FEIR are still applicable to the Specific Plan Amendment, and no new impacts beyond those identified in the FEIR are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**d) *Expose sensitive receptors to substantial pollutant concentrations?***

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.2-15) concluded that onsite construction equipment would have a construction-related diesel exhaust health risk level probability of 0.022 percent (or 2.2 one hundredths of a percent risk per 70-year exposure duration assuming that implementation of toxics best available control technology (T-BACT) is used.

**Discussion of the Specific Plan Amendment:** Development under the Specific Plan Amendment would result in a reduction of air quality emissions, including construction-related diesel exhaust. The proposed Specific Plan Amendment reduces the amount of grading and also eliminates the export of earthwork materials. This results in a reduction of construction related emissions. Operational emissions would also be reduced due to the reduction in overall development intensity and associated vehicular trips. Therefore, the conclusions in the FEIR are still applicable to the Specific Plan Amendment, and no new impacts beyond those identified in the FEIR are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: *Less than Significant.*** The FEIR (page 3.2-15) concluded that onsite construction equipment would have a construction-related diesel exhaust health risk level probability of 0.022 percent (or 2.2 one hundredths of a percent risk per 70-year exposure duration assuming that implementation of toxics best available control technology (T-BACT) is used. This amount of concentration would not have a substantial impact to sensitive receptors and would be considered less than significant.

**Discussion of the Specific Plan Amendment:** Under the proposed Specific Plan Amendment, the development yield would decrease. The allowable uses under the proposed Specific Plan Amendment would be the same as those analyzed in the FEIR and would include a mix of residential, commercial, office and park uses. Therefore, the conclusions of the FEIR are still applicable to the proposed Specific Plan Amendment and no new impacts for this issue area would occur.

**Finding:** No significant impacts for this issue area and no changes in information that would require preparation of an EIR.

#### 4. **Biological Resources – Would the project:**

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

**FEIR Conclusion: *Mitigated to Below a Level of Significance.*** The FEIR (page 3.3-18) concluded several sensitive avian and reptilian species have been identified within the UDSP project area including Cooper's hawk, rufous-crowned sparrow, and orange throated whiptail. These species typically nest and forage in the upland habitats (i.e., coastal sage scrub and emergent wetland) found onsite. Upland habitat occurs within the proposed grading area; therefore, potential direct impacts to these species could occur during construction activities. Activities such as clearing, grubbing and grading would impact habitat where these species could live and/or forage. Mitigation identified in the FEIR would still be applicable for the Specific Plan Amendment, and when implemented, would reduce the potential direct impact to these species to below a level of significance. The mitigation includes a mix of habitat mitigation and pre-construction surveys.

Additionally, the FEIR noted that four least Bell's vireo have been identified outside of the UDSP area within the San Marcos Creek corridor, but within 500 feet of the UDSP area. Mitigation identified in the FEIR would still be applicable under the Specific Plan Amendment and would reduce the impact to below a level of significance.

Two sensitive plant species, southwestern spiny rush and smooth tarplant, were identified within the UDSP area in the FEIR (page 3.3-18). The spiny rush would be preserved within biological open space. The small population (166 individuals) of smooth tarplant was found in disturbed non-native grasslands vegetation in the eastern portion of the UDSP site. Although the smooth tarplant is a California Native Plant Society (CNPS), List 1B.1 species, it is not covered by

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the Multiple Habitat Conservation Plan (MHCP). The City does not recognize CNPS status as a determination of sensitivity. Therefore the FEIR did not identify any impacts related to these two plant species.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would occur within the same footprint and potential impacts would still be the same as identified in the FEIR. Mitigation measures identified in the FEIR (MM BIO 1A through 1E and BIO-1 through 20) would still be applicable to the proposed Specific Plan Amendment and would reduce the impact to below a level of significance.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.3-26) stated that the UDSP project proposes preservation of habitat, revegetation efforts, and compliance with appropriate permit conditions as determined by the CEQA process, the California Department of Fish & Wildlife (CDFW), United States Army Corp of Engineers (USACE), Regional Water Quality Board (RWQCB), and United States Fish & Wildlife Service (USFWS). Additionally, the project would mitigate impacts in a manner that are consistent with the goals of the MHCP.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would occur within the same footprint and potential impacts would still be the same as identified in the FEIR. Mitigation measures identified in the FEIR (BIO-1 through BIO-20) would still be applicable to the proposed Specific Plan Amendment and would reduce the impacts to below a level of significance.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**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?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.3-35) identified impacts to jurisdictional wetlands and waters, including permanent impacts to 3.06 acres and temporary impact to 2.06 acres of USACE Jurisdictional wetlands. Mitigation at a 3:1 and 2:1 ratio was identified in the FEIR for these losses and represents a total of 14.92 acres of mitigation. The FEIR also concluded that permanent impacts to 0.03 acre and temporary impacts to 0.32 acre of Jurisdictional Waters of the U.S. will be mitigated at a 1.5:1 and 1:1 ratio, respectively, for a total of 0.371 acres. Permanent impacts to 4.07 acres and temporary impacts to 2.06 acres of State Jurisdictional Wetlands will be mitigated at a 3:1 and 2:1 ratio, respectively, for a total of 16.33 acres. Additionally, before impacting those areas, the project would require a USACE Section 404 permit and RWQCB Section 401 Water Quality Certification for impacts to USACE jurisdictional wetlands and waters. Additionally, for impacts to CDFG jurisdictional areas, a Section 1600 Series Streambed Alteration Agreement would be required. Impacts were mitigated to below a level of significance.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would occur within the same footprint and potential impacts would be the same as identified in the FEIR. Mitigation measures identified in the FEIR (BIO-1 through BIO-20) would still be applicable to the proposed Specific Plan Amendment and would reduce the impacts to below a level of significance.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.3-20) concluded that the UDSP project site (including offsite and Discovery and Grand extension areas) supports a local corridor within the northwestern portion of the project boundary. This corridor consists primarily of San Marcos Creek and associated riparian habitat. The UDSP was designed to minimize impacts to the San Marcos Creek channel; however, installation of the Grand Avenue bridge and development slopes associated with the project could result in temporary and permanent impacts to the creek which serves as a wildlife corridor. Noise, equipment and human intrusion associated with the construction of the bridge could temporarily disrupt the movements of wildlife that uses the corridor; however, impacts were determined to be less than significant. Biological resources mitigation measures were included in the FEIR and were determined to reduce impacts to below a level of significance.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan amendment retains the same development footprint as the proposed project, including offsite and Discovery and Grand extension areas. Mitigation identified in the FEIR would still be applicable under the Specific Plan Amendment. Conclusions for this issue area in the FEIR are still applicable to the proposed Specific Plan Amendment.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: No Impacts.** The FEIR (page 3.3-25) identified that the City does not currently have any tree preservation policies and no impact was identified for this issue area.

**Discussion of the Specific Plan Amendment:** Development proposed under the Specific Plan Amendment would occur within the same footprint identified in the FEIR. The Specific Plan amendment still has a comprehensive landscape plan which includes the planting of trees, which will add to the stock of urban street trees within the city. Please see Chapter 6 of the Specific Plan document for more information on the landscape plan. The conclusions for the FEIR remain applicable to the proposed Specific Plan Amendment and no additional analysis is required.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

***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?***

***FEIR Conclusion: Less than Significant.*** The FEIR (page 3.3-25) identified that the UDSP project area is located within the City's Subarea Plan (not yet adopted) and is part of the adopted MHCP. The FEIR concluded that mitigation proposed for impacts to sensitive habitat and sensitive species is consistent with the recommendation of the MHCP. The FEIR did not identify any impacts for this issue area.

***Discussion of the Specific Plan Amendment:*** Development proposed under the Specific Plan Amendment would occur within the same footprint identified in the FEIR and the mitigation identified for impacts to biological resources would remain the same. Therefore, the conclusions for the FEIR remain applicable to the proposed Specific Plan Amendment and no additional analysis is required.

***Finding:*** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**5. Cultural Resources – Would the project:**

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

***FEIR Conclusion: Less Than Significant Impact.*** The FEIR concluded that there were two historical resources located within the project area (page 3.4-4): 1) ASM 12760 A&B consists of concrete foundation pads for a post-1945 chicken coop, as well as a concrete drain; and 2) ASM 127760 C consists of concrete foundation pads for a post-1945 chicken coop. The FEIR (page 3.4-9) concluded that these structures were not eligible for listing on the California Register of Historical Resources and concluded that impacts to historical resources would be less than significant.

***Discussion of the Specific Plan Amendment Project:*** Development under the Specific Plan Amendment would still occur within the footprint analyzed in the FEIR. Therefore, the previous conclusions regarding impacts to historical resources in the FEIR are still applicable to the Specific Plan Amendment.

***Finding:*** No new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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

***FEIR Conclusion: Mitigated to Below a Level of Significance.*** The FEIR (page 3.4-9) identified the following previously-identified archaeological resources within the UDSP project area: 1) SDI-17896, a single bedrock outcrop with three grinding slicks; 2) SDI-17897, a single bedrock grinding slick; and 3) SDI-17898, consisting of a concrete pad with floor tiles, remains of a chimney-like structure, and historic/modern debris. Native American consultation noted that subsurface cultural deposits may exist on the project site and the potential for a significant impact. Mitigation measures were identified in the FEIR to reduce the impact to below a level of significance (MM CR-1 through CR-5).

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**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint analyzed in the FEIR. Therefore, the previous conclusions regarding impacts to archaeological resources in FEIR are still applicable to the proposed Specific Plan Amendment and mitigation measures would still be implemented. No new impacts are identified for this issue area.

As part of the SB 18 process, letters were sent to local Tribes informing them of the proposed Specific Plan Amendment.

**Finding:** No new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.4-9) identified that new ground-disturbing activity has the potential to unearth previously unidentified paleontological resources, particularly in areas underlain by sedimentary formations. However, due to the young age of the Quaternary alluvial deposits on the project site, the potential for paleontological resources was determined to be low. Impacts were determined to be less than significant.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint analyzed in the FEIR. Therefore, the previous conclusions regarding impacts to paleontological resources in the FEIR are still applicable to the proposed Specific Plan Amendment and mitigation measures would still be implemented. No new impacts are identified for this issue area.

**Finding:** No new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.4-9) did not identify any human remains or find any indications that they would be expected to be found on the UDSP site.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint analyzed in the FEIR. Therefore, the previous conclusion regarding the potential to impact human remains is still applicable to the proposed Specific Plan Amendment. No new impacts are identified for this issue area.

**Finding:** No new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

### 6. Geology and Soils – Would the project:

a) *Expose people or structures to potential adverse effects, including 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?*

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.5-6) did not identify any known active faults within or adjacent to the UDSP site. The UDSP site is not located within a mapped Alquist-Priolo Earthquake Fault Zone as shown on United States Geological Survey (USGS) or California Geological Survey (CGS) maps.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would occur within the area analyzed in the FEIR. The site does not appear on the most recent Alquist-Priolo Earthquake Fault Zoning Maps, therefore, the conclusions of the FEIR are still applicable to the proposed Specific Plan Amendment and impacts would be less than significant. No new impacts are identified for the for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

ii) *Strong seismic ground shaking?*

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.5-6) stated that future development would be held to the requirements of the Uniform Building Code (UBC) for Zone 4 for resistance to seismic shaking.

**Discussion of the Specific Plan Amendment:** Development under the Specific Plan Amendment would occur within the area analyzed in the FEIR and future development would be designed to be consistent with the most current building codes related to seismic shaking. Therefore, the conclusions of the FEIR are still applicable to the Specific Plan Amendment and impacts would be less than significant.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.5-9) concluded the project area is not to be susceptible to liquefaction due to such factors as density and grain size distribution of the relatively thin and dense colluvial soils, Santiago Formation and granitic rock underlying the site. Based on the soil type on the project site and lightly occurring groundwater, impacts from liquefaction would be less than significant.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment will occur within the footprint analyzed in the FEIR. Therefore, the conclusions regarding seismic-related ground failure, including liquefaction, in the FEIR are still applicable to the proposed Specific Plan Amendment and a less than significant impact is identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

*iv) Landslides?*

**FEIR Conclusion: Less than Significant Impact.** As described in the FEIR (page 2-13), the UDSP area ranges from 550 to 710 feet above mean sea level (AMSL) elevation. The UDSP area is underlain with Cretaceous-aged granitic rock and sandy and silt loam soils. These identified soils and elevations would not be subject to landslides; therefore, impacts due to landslides were determined to be less than significant.

**Discussion of the Specific Plan Amendment:** Development under the Specific Plan Amendment will occur within the footprint analyzed in the FEIR. Therefore, the conclusions regarding including landslides in the FEIR are still applicable to the Specific Plan Amendment and a less than significant impact is identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.5-9) identified soil materials on the UDSP project site to range from slight to high potential for erosion. Since the slopes would be constructed using fill material generated from the cut portions of the site, many of the constructed fill slopes would be prone to superficial erosion, especially during periods of rain. The FEIR noted that implementation of a project-specific Erosion Control Plan and a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the California State Water Resources Control Board Order No. 92-08-DWQ, NPDES General Permit No. CAS000002 will reduce any impacts due to soil erosion. The SWPPP would comply with Best Available Technology (BAT) and Best Conventional Pollutant Control Technology to reduce or eliminate storm water pollution from areas of construction activity.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment does not result in any additional increase in a potential for soil erosion or loss of top soil. Development under the proposed Specific Plan Amendment will still implement, at minimum, the Best Management Practices (BMPs) identified in the Final EIR. Therefore, no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

*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?*

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.5-7) identified the UDSP area as being underlain with Santiago Formation and granitic rock, which are typically not susceptible to liquefaction. The soils derived from the underlain material and bedrock includes: very fine to coarse sandy loams and rocky silt loams. Based on the underlying bedrock and the soil composition of the project site, the FEIR determined that impacts due to landslides would be considered less than significant. The FEIR (page 3.5-10) also identified compressible soils located in a portion of the project area located along Barham Drive. Mitigation measures were identified in the FEIR and would still be applicable to the proposed Specific Plan Amendment.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment occurs within the same area analyzed in the FEIR; therefore, the soil characteristics are the same. Thus, no new impacts are identified and the conclusions of the FEIR are applicable to the proposed Specific Plan Amendment. Mitigation measures were identified in the FEIR and would still be applicable to the proposed Specific Plan Amendment.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.5-9) identified the UDSP area to consist predominantly of very fine to coarse, well-drained sandy loams, which have a low potential for expansion. Impacts were determined to be less than significant.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment occurs within the same area analyzed in the FEIR; therefore, the soil characteristics are the same. Thus, no new impacts are identified and the conclusions of the FEIR are applicable to the proposed Specific Plan Amendment.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**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?***

**FEIR Conclusion: No Impact.** The FEIR (page 3.5-9) identified that the UDSP project would not be serviced by either septic tanks or alternative wastewater disposal system.

**Discussion of the Specific Plan Amendment:** The use of septic tanks or alternative wastewater disposal systems is not proposed under the proposed Specific Plan amendment. As discussed in the FEIR, wastewater service would be through connection with existing sewer systems. Therefore, the conclusions in the FEIR are still applicable to the proposed Specific Plan Amendment and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

## 7. Greenhouse Gas Emissions – Would the project:

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

**FEIR Conclusion: Significant and Unmitigated.** The FEIR (page 3.2-20) analyzed both construction and operational GHG emissions. Impacts were determined to be less than significant as the UDSP project would reduce GHG emissions by approximately 43 percent below “business as usual”. The FEIR (page 3.2-30) concluded that project-level GHG impacts were less than significant.

With regard to cumulative GHG emissions, even with implementation of sustainable policies and reduction measures identified as part of the project, cumulative greenhouse gas emissions were

determined to be significant and unmitigable due to the legal, regulatory, and factual uncertainty regarding the proper greenhouse gas significance threshold, the method for creating thresholds, and the effectiveness of mitigation measures in actually reducing greenhouse gas emissions (page 7-2). These uncertainties made it speculative to conclude that cumulative impacts are adequately reduced to below a level of significance.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would result in a reduction of overall vehicular trips (19 percent), which results in a corresponding reduction in GHG emissions. The project also retains the mixed use character of the project with facilities for pedestrians and bicycles. Therefore the proposed Specific Plan Amendment would not result in any additional GHG impacts that were not already analyzed in the FEIR. No new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Significant and Unmitigated.** With regard to cumulative GHG emissions, even with implementation of sustainable policies and reduction measures identified as part of the project, cumulative greenhouse gas emissions were determined to be significant and unmitigable due to the legal, regulatory, and factual uncertainty regarding the proper greenhouse gas significance threshold, the method for creating thresholds, and the effectiveness of mitigation measures in actually reducing greenhouse gas emissions (page 7-2). These uncertainties made it speculative to conclude that cumulative impacts are adequately reduced to below a level of significance.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would result in a reduction of overall vehicular trips (19 percent), which results in a corresponding reduction in GHG emissions. The project also retains the mixed use character of the project with facilities for pedestrians and bicycles. Therefore the proposed Specific Plan Amendment would not result in any additional GHG impacts that were not already analyzed in the FEIR. No new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

## 8. 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?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** As identified in the FEIR (page 3.6-6), there is potential for accidental upset of fuels, lubricants or various other liquids needed for the operation of construction equipment. Mitigation was included in the FEIR to reduce the potential for impacts to below a level of significance. This mitigation measure requires a 100-foot buffer between fueling area and sensitive habitat.

**Discussion of the Specific Plan Amendment:** Fueling of construction equipment would still be required during construction under the proposed Specific Plan Amendment. Mitigation

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identified in the FEIR would still be applicable and would ensure that impacts remain mitigated to below a level of significance. Therefore, no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant Impact.** As identified in the FEIR (page 3.6-8), potential impacts related to hazardous materials were identified due the presence of lead-based paint, contamination to pesticides, solid waste disposal, and asbestos-containing materials. Mitigation was included in the FEIR to reduce these impacts to below a level of significance. These measures require testing for lead-based paint and asbestos prior to demolition (HAZ-1 and HAZ-2). It also requires the clean-up of debris on the project site (HAZ-3) and testing of soils in areas where previous agricultural activities occurred.

**Discussion of the Specific Plan Amendment:** Demolition of structures containing lead-based paint and asbestos containing materials would still be required under the Specific Plan Amendment and mitigation related to these potential hazards still applies. The Specific Plan Amendment allows for adaptive reuse of buildings, which is a new feature of the Specific Plan. Any adaptive reuse of structure, which may include partial demolition of interior or exterior features would still require implementation of mitigation measures HAZ-1 and HAZ-2 to identify potential asbestos-containing materials and lead based paint, and if those materials are found, the proper handling and disposal. The Specific Plan Amendment does not introduce any additional impacts not already considered in the FEIR.

With regard to debris on the site and the potential for soils to contain pesticide residue from past agricultural operations, implementation of mitigation measures HAZ-3 and HAZ-4 would still be required. Thus impacts related to this threshold were adequately addressed in the FEIR and no additional impacts are identified.

**Finding:** No new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant Impact.** As identified in the FEIR (page 3.6-5), there are no known public or private schools located within one-quarter mile of the proposed project that would subject sensitive receptors to any hazardous materials due to the proposed project. Impacts related to this topic were determined to be less than significant during the Initial Study process for the FEIR.

**Discussion of the Specific Plan Amendment:** A future K-6 elementary school could be developed within the Specific Plan area. This was identified as an allowable use under the adopted Specific Plan. The uses proposed in the Specific Plan area would not be characterized as uses that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste.

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Therefore, the conclusions of the FEIR are still applicable to the proposed Specific Plan Amendment and no new impacts for this issue area would occur.

**Finding:** No new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

**d) *Be on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code 675962.5 and, as a result, would it create a significant hazard for people residing or working in the project area?***

**FEIR Conclusion: Less Than Significant Impact.** The FEIR (page 3.6-2) included a hazards database records search. The database search did not identify any areas of concern within the UDSP area and impacts were determined to be less than significant.

**Discussion of the Specific Plan Amendment:** At the time of the FEIR records search, the Unocal Station on 102 East Carmel Street was the nearest leaking underground storage tank (LUST) located east of Twin Oaks Valley Road. The LUST case has completed corrective action and the case was closed as of March 30, 2011. A recent review of the Department of Toxic Substance Control Database (EnviroStor) did not identify any new areas of concern within the project site since adoption of the FEIR<sup>1</sup>. Therefore, no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport, would the project result in a safety hazard for people residing or working in the project area?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.6-5) noted that the nearest airport is McClellan-Palomar airport, located approximately five miles west of the UDSP area. The influence area is regulated by the Airport Land Use Commission, which regulates land uses in the area to be compatible with airport-related noise, safety, airspace protection, and over-flight factors. The project area is located within Review Area 2, which consists of limits on heights of structures in areas of high terrain. Impacts were determined to be less than significant as part of the Initial Study process for the FEIR.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would occur within the footprint analyzed in the FEIR, though the overall development intensity would decrease. Revisions to the grading plan would result in the finished pad height being higher in some areas than under the Adopted Specific Plan (northern portion of the project site, east of Twin Oaks Valley Road); however, those areas also have a reduction in the maximum building height. The project would not result in a safety hazards from airport traffic for people residing or working in the project area. The previous conclusion of less than significant impact for this issue area is still applicable to the proposed Specific Plan Amendment and no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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<sup>1</sup> <http://www.envirostor.dtsc.ca.gov/public/>

***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?***

**FEIR Conclusion: No Impact.** As discussed in the previous significance criteria VIII, the FEIR identified the McClellan-Palomar airport as closest to the UDSP area with no identified private airstrips located within the vicinity of the proposed project area.

**Discussion of the Specific Plan Amendment:** Development proposed under the Specific Plan Amendment would be within the same footprint as analyzed in the FEIR. There are no new private airports in the vicinity of the project site; therefore, no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: No Impact.** The UDSP Initial Study (page 21, see Appendix A.2 of the FEIR) concluded that the additional roadway access will improve circulation, allowing for improved emergency services access and would not physically interfere with any adopted emergency response plans or emergency evacuation plans. No impact was identified for this issue area in the FEIR.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment will still provide the roadway connections via the improvement of both onsite and offsite roadways. Though the configurations of some of the internal streets have changed, these changes would not result in any impairment with adopted emergency response plans or emergency evacuation plans. Thus the conclusions in the FEIR are still applicable to the Specific Plan Amendment and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant Impact.** The FEIR identified that approximately 50 percent of the UDSP area is undeveloped and supports vegetation and noted that the proposed UDSP development with maintained parks and urban open spaces would reduce the danger of wildfires. Per the FEIR, impacts were determined to be less than significant for the UDSP.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment will still develop the project site and have maintained parks and urban open spaces. Thus the reduction of wildfire threat will be the same under the proposed Specific Plan Amendment. Thus the conclusions of the FEIR are still applicable to the project and no new impacts are identified for this issue area.

**Finding:** No new impact and no changes in information that would require preparation of an EIR.

#### 9. Hydrology and Water Quality – Would the project:

**a) *Violate any water quality standards or waste discharge requirements?***

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR prepared for the UDSP identified significant impacts related to water quality; however, mitigation measures were identified (HW-1 and HW-2) to reduce the impacts to below a level of significance.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still have the potential to impact water quality; however, development under the proposed Specific Plan Amendment would be required to comply with the latest City of San Marcos Standard Urban Stormwater Mitigation Plan (SUSMP) and the NPDES permit that is in place at the time of development. Additionally, the proposed Specific Plan Amendment retains the information pertaining to Low Impact Development (LID) which addresses the quantity and rate of runoff from the project site and has water quality benefits. Finally, mitigation identified in the FEIR will still be applicable to the project. The proposed Specific Plan Amendment does not result in any new impact beyond those identified in the FEIR.

**Finding:** No new impact and no changes in information that would require preparation of an EIR.

**b) *Have a potentially significant adverse impact on groundwater quality or cause or contribute to an exceedance of applicable groundwater receiving water quality objectives or degradation of beneficial uses?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR concluded (page 5-2) that the UDSP would not have an impact to ground water quality. Impacts were determined to be less than significant.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would develop the same types of uses as analyzed in the FEIR for the adopted Specific Plan. Such uses include residential, commercial and office and would not impact groundwater quality or degrade beneficial uses. Therefore, the FEIR adequately addressed this issue area for the proposed Specific Plan Amendment and no new impacts are identified.

**Finding:** No new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

**c) *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 preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 5-2) noted that some groundwater may be used for irrigation. The FEIR noted that implementation of the Specific Plan would likely increase the amount of impermeable surface area compared to the current condition, but percolation will still occur in areas where grass, permeable pavement and groundcover is proposed. The FEIR concluded that implementation of the UDSP would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and impacts are anticipated to be less than significant.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment does not propose an increase in groundwater use. Potable water service would continue to come from Vallecitos Water District (VWD) and some groundwater may be used for irrigation. Thus the FEIR conclusions remain accurate for the proposed Specific Plan Amendment. No new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**d) *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 which would result in substantial erosion or siltation on-or off-site (e.g., downstream)?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.7-16) identified that the UDSP project, upon build-out, is anticipated to increase flow rates in San Marcos Creek by 385.5 cubic feet per second (cfs) to 1,848.3 cfs. The San Marcos Creek flow rate during a 100-year storm event is approximately 12,400 cfs. Based upon a longer 100-year runoff time of concentration of the San Marcos Creek drainage basin, peak flows for the creek will not occur concurrently with peak flows for the project drainage basin. Thus a less than significant impact was identified in the FEIR.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would be required to comply with the latest City of San Marcos SUSMP and the NPDES permit that is in place at the time of development. Additionally, the proposed Specific Plan Amendment retains the information pertaining to LID which addresses the quantity and rate of runoff from the project site (see Section IV.5 of the Specific Plan). All post-project runoff flow rates and durations shall not exceed pre-project runoff flow rates and duration per the County of San Diego Guidelines for Determining Significance Hydrology. Adherence to these regulatory requirements and LID strategy would ensure that future development within the Specific Plan Area would not substantially alter the existing drainage patterns of the site or area. No new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**e) *Create a significant adverse environmental impact to drainage patterns due to changes in runoff flow rates or volumes?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.7-16) identified existing drainage points would not be changed by the proposed UDSP project. The FEIR noted that the UDSP would increase flow rates in San Marcos Creek by 385.5 cubic feet per second (cfs) to 1,848.3 cfs. The San Marcos Creek flow rate during a 100-year storm event is approximately 12,400 cfs. Based upon a longer 100-year runoff time of concentration of the San Marcos Creek drainage basin, peak flows for the creek will not occur concurrently with peak flows for the project drainage basin. Thus a less than significant impact was identified in the FEIR.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would be required to comply with the latest City of San Marcos SUSMP and the NPDES permit that is in place at the time of development. Additionally, the proposed Specific

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Plan Amendment retains the information pertaining to LID which addresses the quantity and rate of runoff from the project site (see Section IV.5 of the Specific Plan).

Overall, the conceptual plan identifies potential publicly- and privately-owned space for LID improvements such as vegetated roofs, flow through planters, permeable paving, bio-retention and infiltration. Developers may choose to employ any combination of one or more LID strategies to successfully manage the storm water run-off resulting from development on their individual project site.

Center drained bioretention medians are being proposed along the public stress in order to satisfy flood control, water quality, and hydromodification requirements. In addition, urban street trees planted in structural soil may also serve to capture storm water run-off. Chapter VI (Form Based Code) of the Specific Plan provides more detailed requirements for how to integrate this LID option into the streetscape design. The permeable paving LID option has been incorporated within the conceptually-planned surface parking lots throughout the District.

The bio-retention LID option has been incorporated into the District's large landscaped areas, Knoll Park vicinity, Twin Oaks Plaza (West), East Green Park, East Paseos near the Student Housing Village, and residential open space areas along the northwestern portion of the site.

Implementation of the LID strategies in the Specific Plan as well as adherence to regulatory requirements related to stormwater would ensure that future development within the Specific Plan Area would not create a significant adverse environmental impact to drainage patterns due to changes in runoff flow rates or volumes. No new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

- f) *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 which would result in flooding on-or off-site?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.7-19) concluded that the UDSP project would maintain the same major discharge points as the existing conditions. Flow volume at identified discharge point two during a 100-year storm could not be accommodated by the existing 24-inch storm drain. An overland release would be constructed to route some of the flow volume to discharge point three to directly discharge to San Marcos Creek, which is determined to have adequate capacity.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would be required to comply with the latest City of San Marcos SUSMP and the NPDES permit that is in place at the time of development. Additionally, the proposed Specific Plan Amendment retains the information pertaining to LID which addresses the quantity and rate of runoff from the project site (see Section IV.5 of the Specific Plan). All post-project runoff flow rates and durations shall not exceed pre-project runoff flow rates and duration per the County of San Diego Guidelines for Determining Significance Hydrology. Adherence to these regulatory requirements and LID strategy would ensure that future development within the Specific Plan Area would not substantially alter the existing drainage patterns of the site or area in a manner that would result in flooding on- or off-site. No new impacts are identified for this issue area.

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**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**g) *Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?***

**FEIR Conclusion: Less than Significant.** According to the FEIR (page 3.7-19), the UDSP project would maintain the same major discharge points identified under the existing conditions. Thus, the increase in surface runoff would not result in flooding.

**Discussion of the Specific Plan Amendment:** Under the proposed Specific Plan Amendment, the same major drainage points identified in the FEIR would be maintained. As previously noted, the development under the proposed Specific Plan Amendment would be required to comply with the latest City of San Marcos SUSMP and the NPDES permit that is in place at the time of development. Additionally, the proposed Specific Plan Amendment retains the information pertaining to LID which addresses the quantity and rate of runoff from the project site (see Section IV.5 of the Specific Plan). All post-project runoff flow rates and durations shall not exceed pre-project runoff flow rates and duration per the County of San Diego Guidelines for Determining Significance Hydrology. The FEIR adequately analyzed this issue area, and no new impacts associated with the proposed Specific Plan Amendment are anticipated.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**h) *Result in increased impervious surfaces and associated increased runoff?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.7-20) noted that implementation of the UDSP would increase the amount of impervious surfaces which could potentially result in increased surface runoff, alteration of the regional drainage pattern, and flooding. The UDSP would increase the 100-year discharge into San Marcos Creek by 385.5 cubic feet per second (cfs) over existing conditions. Hydromodification analysis demonstrated that the project development approach will match flow rates and durations deemed hydraulically significant for the creek and impacts for the UDSP were determined to be less than significant.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would result in an increase in impervious surfaces compared to the existing condition. While the project decreases the intensity of development, a similar amount of impervious surfaces are still expected. Therefore, the conclusions of the Final EIR are appropriate for the proposed Specific Plan Amendment and no new impacts are identified.

**Findings:** There are no changes or new information associated with this project that would require the preparation of an EIR.

**i) *Result in significant alteration of receiving water quality during or following construction?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.7-20) identified the preparation of project-specific SWPPPs per the National Pollutant Discharge Elimination System (NPDES) permit program and implementation of BMPs to prevent construction-related runoff from polluting receiving waters. Additionally, the Specific Plan has been designed to incorporate a variety of BMPs, IMPs, and LID features to limit the potential for water quality impacts to the greatest extent feasible for a less than significant impact. In addition, a Storm Water

Management Plan will be implemented to reduce potential impacts to receiving water quality to ensure water quality standards and discharge requirements. In addition, the grading plan will comply with the City Municipal Code Grading Ordinance, Chapter 17.32, San Diego County Code of Regulatory Storm Water Ordinances Sections 67.801 through 67.811, and Statewide General Construction Stormwater Permit No. CAS000002. Should SWPPP requirements change, due to changes in permit or City SUSMP requirements, the BMPs used during development and construction would reflect the latest requirements.

**Discussion of the Specific Plan Amendment:** Development under the Specific Plan Amendment would still have the potential for construction and operational water quality impacts. However, these do not represent any new impacts above and beyond the impacts identified in the FEIR. As previously noted, the development under the proposed Specific Plan Amendment would be required to comply with the latest City of San Marcos SUSMP and the NPDES permit that is in place at the time of development. Additionally, the future development would incorporate LID strategies which provide a water quality benefit. The FEIR adequately analyzed this issue area, and no new impacts associated with the proposed Specific Plan Amendment are anticipated.

**Finding:** No new impact and no changes in information that would require preparation of an EIR.

- j) ***Result in an increase in pollutant discharges to receiving waters? Consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical storm water pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash).***

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR prepared for the UDSP concluded that with implementation of BMPs, impacts related to an increase in pollutant discharges to receiving waters would be less than significant (page 3.7-15).

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still have the potential for construction and operational water quality impacts. However, these do not represent any new impacts above and beyond the impacts identified in the FEIR. As previously noted, the development under the proposed Specific Plan Amendment would be required to comply with the latest City of San Marcos SUSMP and the NPDES permit that is in place at the time of development. Additionally, the future development would incorporate LID strategies which provide a water quality benefit. The FEIR adequately analyzed this issue area, and no new impacts associated with the proposed Specific Plan Amendment are anticipated.

**Finding:** No new impact and no changes in information that would require preparation of an EIR.

- k) ***Be tributary to an already impaired water body as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.7-15) identified that the San Marcos Creek is listed on the 2008 CWA Section 303(d) List for benthic community effects, benthic-marcoinvertebrate bioassessments, DDE, phosphorus, selenium, total dissolved solids, turbidity and sediment. In addition, Lake San Marcos is impaired for ammonia as nitrogen, foam/scum/oil slicks, nutrients, total dissolved solids, and phosphorus. To avoid potential construction-related impacts to sensitive areas, a site-specific SWPPP would be implemented

during construction of the project. Implementation of the SWPPP and appropriate BMPs would reduce construction-related runoff from any riparian areas to prevent potential contamination.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment would still incorporate BMPs and landscape features to desilt and/or filter runoff before outlet into San Marcos Creek and Lake San Marcos. Please see response 3.3.9(e) for specific information on the proposed LID strategy for the project site. There are no new impacts for this issue area. Therefore, the analysis in the FEIR is adequate for the proposed Specific Plan Amendment and no new impacts are identified.

**Findings:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

***l) Be tributary to environmentally sensitive areas (e.g., MSCP, RARE, Areas of Special Biological Significance, etc.)? If so, can it exacerbate already existing sensitive conditions?***

**FEIR Conclusion: Less than Significant Impact.** As noted in the FEIR (page 3.7-15), San Marcos Creek is located to the northwest of the project area. Under existing conditions surface runoff discharges into San Marcos Creek either by sheet flow or through minor drainage facilities. To avoid potential construction-related impacts to sensitive areas, a site-specific SWPPP would be implemented during the construction phase of the proposed project.

**Discussion of the Specific Plan Amendment:** Future development under the proposed Specific Plan Amendment would still be required to prepare a site-specific SWPPP as well as comply with the City of San Marcos SUSMP and the NPDES permit that is in effect at the time development is proposed. Adherence to these regulatory requirements would ensure that there are no impacts due to water quality to any environmentally sensitive areas. The proposed Specific Plan Amendment does not result in any new impacts.

**Findings:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

***m) Have a potentially significant environmental impact on surface water quality, to either marine, fresh or wetland waters?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR (Page 3.7-16) concluded that that upon development and ultimate build-out of the project the site would continue to discharge into San Marcos Creek and Lake San Marcos. The implementation of the SWPPP and applicable BMPs to prevent contaminants from entering storm drains to minimize the amount of uncontrolled runoff to surface waters will prevent potential impact to marine, fresh or wetland waters. The Initial Study prepared for the UDSP project (Appendix A.2 of the FEIR) determined that all onsite drainage would convey runoff through an appropriately designed drainage system prior to outlet into any marine, fresh water or wetland waters, per the requirements of existing regulations and state and local water quality standards.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still discharge to San Marcos Creek. Under the proposed Specific Plan Amendment, onsite drainage would continue to convey runoff through an appropriately designed drainage system prior to outlet into any marine, fresh water or wetland waters, per the requirements of existing regulations and state and local water quality standards. As previously noted, the development under the proposed Specific Plan Amendment would be

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required to comply with the latest City of San Marcos SUSMP and the NPDES permit that is in place at the time of development. Additionally, the future development would incorporate LID strategies which provide a water quality benefit. The FEIR adequately analyzed this issue area, and no new impacts associated with the proposed Specific Plan Amendment are anticipated.

**Finding:** No new impact and no changes in information that would require preparation of an EIR.

***n) Otherwise substantially degrade water quality?***

**FEIR Conclusion: Less Than Significant.** The FEIR prepared for the UDSP did not identify any other issues related to water quality.

**Discussion of the Specific Plan Amendment:** As previously noted, the development under the proposed Specific Plan Amendment would be required to comply with the latest City of San Marcos SUSMP and the NPDES permit that is in place at the time of development. Additionally, the future development would incorporate LID strategies which provide a water quality benefit. The FEIR adequately analyzed this issue area, and no new impacts associated with the proposed Specific Plan Amendment are anticipated.

**Finding:** No new impact and no changes in information that would require preparation of an EIR.

***o) 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?***

**FEIR Conclusion: No Impact** The Initial Study prepared for the UDSP project (Appendix A.2 of the FEIR) determined that the project is located adjacent to the San Marcos Creek and included in the boundaries of a 100-year flood hazard zone area. No construction of housing was proposed within a 100-year flood hazard area and no impact was identified for this issue area.

**Discussion of the Specific Plan Amendment:** Housing would still be allowed under the proposed Specific Plan amendment, but none of the housing would be within areas mapped on a Federal Flood Hazards Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Therefore no impact is identified for this issue area and the conclusions of the FEIR are still applicable to the proposed Specific Plan Amendment. No new impacts are identified.

**Findings:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

***p) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?***

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.7-19) noted that the proposed extension of Grand Avenue and the SR 78 flyover across San Marcos Creek could require development within a 100-year flood hazard area. This was identified as a potentially significant impact. Mitigation measure HW-1 was included in the FEIR to reduce the impact to below a level of significance.

**Discussion of the Specific Plan Amendment:** Under the proposed Specific Plan Amendment, the extension of Grand Avenue and the SR 78 flyover across San Marcos could require development within a 100-year flood hazard area, thus the mitigation identified in the FEIR would still be required. The proposed Specific Plan Amendment does not result in any increase in impacts for this issue area. No new impacts are identified.

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**Findings:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

**q) *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?***

**FEIR Conclusion: No Impact** The Initial Study prepared for the UDSP project (Appendix A.2 of the FEIR) determined that the project area is not located in an area susceptible to flooding due to failure of a levee or dam.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment would be developed within the same footprint as analyzed in the FEIR. Therefore the conclusions in the FEIR are still applicable to the proposed Specific Plan Amendment. There are no new impacts related to exposure of 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.

**Findings:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

**r) *Inundation by seiche, tsunami, or mudflow?***

**FEIR Conclusion: No Impact.** The Initial Study prepared for the UDSP (Appendix A.2 of the FEIR) concluded that the project area is located approximately seven miles from the Pacific Ocean and would have a low potential for flooding impacts due to a tsunami. South Lake is located approximately one mile south, over the hill and west of Twin Oaks Valley Road and would not be located within an inundation zone in the event of a dam breach at South Lake. In addition, the project is not located in an area that would be subject to a mudflow.

**Discussion of the Specific Plan Amendment:** The project site remains in an inland location, away from a coastal area or an enclosed water body. Therefore, the conclusions of the FEIR are still applicable to the proposed Specific Plan Amendment and no new impact is identified.

**Findings:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

## 10. Land Use and Planning – Would the project:

**a) *Physically divide an established community?***

**FEIR Conclusion: No Impact.** The Initial Study (FEIR Appendix A.2) determined that the project would not divide an established community because the development either exists or is planned along the majority of the project boundaries. The UDSP project proposed internal circulation networks that will enhance vehicular, bicycle, and pedestrian movement to better connect to offsite areas.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment makes some modifications to the internal street network; however, enhanced movement of vehicles, bicycles and pedestrians between onsite and offsite areas is still proposed. Therefore the conclusions in the FEIR are still applicable the Specific Plan Amendment and no impact is identified.

**Findings:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the 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?**

**FEIR Conclusion: Less than Significant Impact.** The FEIR prepared for the UDSP did not identify any conflicts with applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purposes of avoiding or mitigating an environmental effect (page 3.8-21).

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment represents changes to the adopted Specific Plan to decrease the intensity of development, modify the roadway network internal to the project, reconfigure park spaces, and make other minor refinements. The amended Specific Plan reflects these changes. No new impacts are identified.

**Findings:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.3-25) identified that the UDSP project area is located within the City's Subarea Plan (not adopted) and is part of the adopted MHCP. The FEIR concluded that mitigation proposed for impacts to sensitive habitat and sensitive species is consistent with the recommendation of the MHCP. The FEIR did not identify any impacts for this issue area.

**Discussion of the Specific Plan Amendment:** Development proposed under the Specific Plan Amendment would occur within the same footprint identified in the FEIR and the mitigation identified for impacts to biological resource would remain the same. Therefore, the conclusions for the FEIR remain applicable to the proposed Specific Plan Amendment and no additional analysis is required.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

#### 11. Mineral Resources – Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?**

**FEIR Conclusion: No Impact.** The FEIR (page 5-4) identified that according to the City's General Plan, the State's Mineral Land Classification Maps identifies the City as unsuitable as a source of sand and gravel resources.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint analyzed in the FEIR. Therefore, the FEIR conclusion of no impact to mineral resources would still be applicable to the proposed Specific Plan Amendment. Therefore, no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**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?**

**FEIR Conclusion: No Impact.** The FEIR (page 5-4) identified that according to the City's General Plan, the State's Mineral Land Classification Maps identifies the City as unsuitable as a source of sand and gravel resources.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the footprint analyzed in the FEIR. Therefore, the FEIR conclusion of no impact to mineral resources would still be applicable to the proposed Specific Plan Amendment. Therefore, no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**12. Noise – Would the project:**

**a) Result in the 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?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR prepared for the UDSP identified noise impacts related to the placement of residential and commercial uses in proximity to each other as part of a mixed use project (page 3.9-12). Mitigation measures were identified (N-4 and N-5) to reduce the impacts to below a level of significance.

**Discussion of the Specific Plan Amendment:** The development under the proposed Specific Plan Amendment would be similar to the uses analyzed in the FEIR, and the same potential for noise conflicts at the interface of commercial and residential uses exists. Noise mitigation identified in the FEIR would be applicable to the proposed Specific Plan Amendment and would reduce impacts to below a level of significance. No new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**b) Expose persons to or generate excessive groundborne vibration or groundborne noise levels?**

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.9-10) identified potential construction-related vibration impacts due to proposed blasting. Mitigation was identified (N-3) to reduce the impact. The mitigation measure required a distance separation between blasting activities and nearby sensitive receptors.

**Discussion of the Specific Plan Amendment:** Uses proposed under the proposed Specific Plan Amendment would be similar to those analyzed in the FEIR. No new uses which would be characterized as capable of causing excessive groundborne vibration or groundborne noise would be developed. Overall, the grading for the project will be reduced under the proposed Specific Plan Amendment. Therefore the FEIR conclusions are still applicable to the proposed Specific Plan Amendment and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

***c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?***

***FEIR Conclusion: Mitigated to Below a Level of Significance.*** The FEIR prepared for the UDSP identified noise impacts to offsite sensitive receptors due to vehicular noise (page 3.9-10). The FEIR also identified impacts to residences on Westlake Drive, north of San Marcos Boulevard. Mitigation measures were identified (N-4 through N-6) to reduce the impacts to below a level of significance.

***Discussion of the Specific Plan Amendment:*** The proposed Specific Plan Amendment reduces the overall intensity of development, thus the number of vehicular trips would be reduced. Therefore, there would be a reduction in overall vehicular-related noise. Based upon the traffic analysis prepared for the project (Appendix C of this document), the number of vehicular trips on roadways within the project area and in the vicinity will either remain the same or be reduced (see Table 7 in Section 3.3.7 of this document). As such, the proposed Specific Plan Amendment would not result in any increases in the ambient noise level that were not already considered in the FEIR. No new impacts are identified. Noise mitigation identified in the FEIR would still be applicable under the proposed Specific Plan Amendment.

***Finding:*** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

***d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?***

***FEIR Conclusion: Mitigated to Below a Level of Significance.*** The FEIR (pages 3.9-9 and 3.9-10) identified significant impacts related to construction noise and vibration. Mitigation requiring buffering of construction activity and distance separation of blasting activities from adjacent residential uses was identified for the project. The FEIR concluded that this mitigation would reduce the impacts to below a level of significance.

***Discussion of the Specific Plan Amendment:*** Proposed grading under the Specific Plan Amendment would be reduced, which corresponds to a reduction in construction noise. Noise mitigation identified in the FEIR would be applicable to the proposed Specific Plan Amendment and would reduce impacts to below a level of significance. No new impacts are identified.

***Finding:*** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

***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 expose people residing or working in the project area to excessive noise levels?***

***FEIR Conclusion: Less than Significant.*** The FEIR (page 3.9-13) identified that the closest public airport to the project area is McClellan-Palomar Airport, located approximately 5.5 miles west of the project site. According to the Airport Land Use Compatibility Plan (ALUCP) for the McClellan-Palomar Airport, the proposed project site is not located within the 60 dB CNEL noise contour of the airport; therefore, impacts related to airport noise are considered less than significant.

***Discussion of the Specific Plan Amendment:*** The project site is in the same location and remains at an adequate distance from any operating airports to avoid any type of noise impact from

operating aircraft. Therefore, the conclusions in the FEIR are still applicable to the proposed Specific Plan Amendment and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

***f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?***

**FEIR Conclusion: No Impact.** The Initial Study prepared as part of the scoping for the FEIR concluded that the project was not in the vicinity of a private airstrip. Therefore no impact was identified and this issue was not discussed further in the FEIR.

**Discussion of the Specific Plan Amendment:** The project site is in the same location and remains at an adequate distance from any operating airports to avoid any type of noise impact from operating aircraft. Therefore, the conclusions in the FEIR are still applicable to the proposed Specific Plan Amendment and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**13. Population and Housing – Would the project:**

***a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?***

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.10-5) concluded that the UDSP would increase population by the addition of 2,600 mixed-use residential units and would create additional infrastructure; however, impacts were determined to be less than significant.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still include the same number of residential units (2,600 units) and the same level of population increase. Therefore, the conclusion of less than significant is still applicable to the proposed Specific Plan Amendment and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.10-5) noted that the existing residents could stay in their current locations until parcels are acquired by the developer. Until that time, none of the residences with the UDSP area would be required to be vacated. Full build-out of the UDSP would require approximately 75 existing residences would be removed. Impacts were determined to be less than significant. The FEIR concluded this was a less than significant impact since 2,600 residential units would be construction on the site.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still require the removal of up to 75 residences; however, as previously noted, none of the residences within the UDSP area would be required to be vacated until parcels are acquired by the developer. Under the Specific Plan Amendment, the project will still

construct 2,600 mixed-use residential units and up to 800 student housing units. Therefore, the conclusion of less than significant is still applicable to the proposed Specific Plan Amendment and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

***c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?***

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.10-5) noted that the existing residents could stay in their current locations until parcels are acquired by the developer. Until that time, none of the residences within the UDSP area would be required to be vacated. Full build-out of the UDSP would require approximately 75 existing residences would be removed. Impacts were determined to be less than significant. The FEIR concluded this was a less than significant impact since 2,600 residential units would be construction on the site.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still require the removal of up to 75 residences; however, as previously noted, none of the residences within the UDSP area would be required to be vacated until parcels are acquired by the developer. Under the Specific Plan Amendment, the project will still construct 2,600 mixed-use residential units and up to 800 student housing units. Therefore, the conclusion of less than significant is still applicable to the proposed Specific Plan Amendment and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

#### **14. Public Services – Would the 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 would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services?***

***i) Fire protection?***

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.11-8) concluded that the UDSP project would affect the City Fire Department due to the addition of residents and businesses. The FEIR concluded that the City Fire Department would be capable of handling an increase in services. The proposed project is expected to result in minimal response needs from the fire department. Any incremental effects would be offset by the City requirement for payment of fees in the CFD 98-01 for fire protection to make the impact less than significant.

**Discussion of the Specific Plan Amendment:** Under the proposed Specific Plan Amendment, the intensity of development would decrease. This would result in a corresponding decrease in demand for fire protection services. Development under the proposed Specific Plan Amendment would still be required to participate in the preexisting Fire Community Facilities District which would provide funding for enhancing the Fire Department/Emergency Medical Service and would continue to keep impacts at a less than significant level. No new impacts are identified

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due to the implementation of the proposed Specific Plan Amendment and the conclusions of the FEIR are still applicable.

**Finding:** No new impacts for this issue area are identified and there are no changes in information that would require preparation of an EIR.

*ii) Police protection?*

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.11-9), identified that the UDSP project would result in an increase in demand to police protective services from the San Diego County Sheriff's Department due to the increase in area residents and businesses. The proposed project is expected to result in minimal response needs from the Sheriff's department. Any incremental effects of the proposed project's demand on police protection were determined to be offset by the City requirement for the payment of fees to CFD 98-01 for police protection to make the impact less than significant.

**Discussion of the Specific Plan Amendment:** Under the proposed Specific Plan Amendment, the intensity of development would decrease. This would result in a corresponding decrease in demand for police protection services. Development under the proposed Specific Plan Amendment would still be required to participate in CFD-98-01 for police protection which would provide funding for additional police protection services and would keep impacts at a less than significant level. No new impacts are identified due to the implementation of the proposed Specific Plan Amendment and the conclusions of the FEIR are still applicable.

**Finding:** No new impacts for this issue area are identified and there are no changes in information that would require preparation of an EIR.

*iii) Schools?*

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.11-10) identified that the UDSP project would generate an additional 1,167 students which would need to be served by the San Marcos Unified School District. To offset the additional facilities and service that will be needed, future development would be required to pay Level II Statutory School Fees at the time the building permit is obtained to make the impact less than significant.

**Discussion of the Specific Plan Amendment:** Student generation is associated with residential development. Under the proposed Specific Plan Amendment, the number of residential units would stay the same (2,600 units). Therefore the conclusions in the FEIR are still applicable. At the time development is proposed, payment of school fees in effect at the time of building would still be required to be paid to the San Marcos Unified School District. Therefore, no new impacts are identified due to the implementation of the proposed Specific Plan Amendment and the conclusions of the FEIR are still applicable.

**Finding:** No new impacts for this issue area are identified and there are no changes in information that would require preparation of an EIR.

*iv) Parks?*

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.12-9) identified that the UDSP would construct 17.37 acres of park space, 7.96 acres of plazas and paseos, and 1.38 acres of trails. Even with the additional park space and trails proposed under the UDSP, impacts would occur to recreational facilities and parks due to the additional 10,500 residents that the UDSP would add to the City population. This would result in a deficiency in park space. The FEIR

concluded that this deficiency would be made up through the payment of fees as required by City Ordinance 88-799 (Municipal Code, Chapter 20.12, Growth Management).

**Discussion of the Specific Plan Amendment:** The Specific Plan Amendment reduces the amount of urban plazas but increases the amount of urban parks. Under the proposed Specific Plan Amendment, there would be 4.5 acres of urban plazas and 21.3 acres of urban parks. This is an overall net increase in urban open space of 0.30 acres.

The Knoll Park and Neighborhood Green in the southern portion of the plan area (west of Twin Oaks Valley Road) has been expanded and reconfigured to take advantage of the prominent topographical features on the project site. Additional park features and paseos are incorporated throughout the Specific Plan area. The project still proposes 1.38 acres of trail. Since the project increases the amount of urban open spaces and will pay park fees, impacts to parks and recreation would be less than significant under the proposed Specific Plan Amendment. This is consistent with the conclusion in the FEIR. No new impacts would be realized from the proposed Specific Plan Amendment.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

v) *Other public facilities?*

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.11-10) identified that the UDSP would result in additional residents that would increase demands on library services and resources, although additional library services were identified through the California State University San Marcos and Palomar College campuses. The additional library facilities would reduce impacts to a level of less than significant impact.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment results in the same amount of residential development, thus the demand for library service would be the same. Impacts to libraries would be less than significant under the proposed Specific Plan Amendment. This is consistent with the conclusion in the FEIR. No new impacts would be realized from the proposed Specific Plan Amendment.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

#### 15. Recreation – Would the project:

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?*

**FEIR Conclusion: No Impact.** The UDSP project proposes the construction of 17.37 acres of park space, 7.96 acres of plazas and paseos, and 1.38 acres of trails. The FEIR (page 3.12-9) identified impacts to recreational facilities and parks even with the additional park space and trails due to the additional 10,500 residents that the UDSP would add to the City population, which would result in a deficiency in park space. This deficiency would be made up through the payment of fees as required by City Ordinance 88-799 (Municipal Code, Chapter 20.12, Growth Management) as part of the project design for future development of parks and recreation.

**Discussion of the Specific Plan Amendment:** The Specific Plan Amendment reduces the amount of urban plazas but increases the amount of urban parks. Under the proposed Specific Plan Amendment, there would be 4.5 acres of urban plazas and 21.3 acres of urban parks. This is an overall net increase in urban open space of 0.30 acres.

The Knoll Park and Neighborhood Green in the southern portion of the plan area (west of Twin Oaks Valley Road) has been expanded and reconfigured to take advantage of the prominent topographical features on the project site. Additional park features and paseos are incorporated throughout the Specific Plan area. The project still proposes 1.38 acres of trail. Since the project increases the amount of urban open spaces and pays fees, impacts to parks and recreation would be less than significant under the proposed Specific Plan Amendment. This is consistent with the conclusion in the FEIR. No new impacts would be realized from the proposed Specific Plan Amendment.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**No Impact.** Please refer to Section 14.a above.

#### 16. Transportation/Traffic – Would the project:

**a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant circulation systems, including but not limited to intersections, streets, highways and freeways, pedestrian, bicycle paths and mass transit?**

**FEIR Conclusion: Significant and Unmitigated Impacts.** The FEIR analyzed trip generations due to the following land uses: mixed use multi-family residential, mixed use community commercial, mixed use office, mixed use medical office, hotel, community center, and elementary school, in addition to construction related traffic over a 20 year time period for future development. The FEIR (page 3.13-64 through 3.13-67) concluded that the project would not impact roadway segments for the Year 2015 time frame, would be considered less than significant impact for the 2020 time frame with the completion of the SR 78 flyover at Westlake Drive bridge, and would have a significant and unmitigated impact SR 78 ramps for the 2030 timeframe scenario.

**Discussion of the Specific Plan Amendment:** A new traffic assessment was prepared (RBF 2014) and is included as **Appendix C** of this document. This traffic impact assessment includes a review of various traffic-related factors that have a primary influence on the potential for the revised project to generate traffic impacts. The key traffic-related factors include:

- Land use changes and associated traffic generation;
- Changes to project-related trip assignment at build-out on study area roadways and at study area intersections;
- Changes to project-related traffic impacts;

- Changes to required mitigation measures;
- Changes to on-site traffic circulation needs; and
- Changes to mitigation phasing requirements.

At full build-out the proposed UDSPA project will consist of the following uses:

- 3,400 Mixed-Use Multi-Family Dwelling Units
- 700,000 square-feet Mixed-Use Community Commercial
- 652,000 square-feet Mixed-Use Office
- 300,000 square-feet Mixed-Use Medical Office
- 450 Hotel Rooms
- 30,000 square-foot Community Center
- 850-student Elementary School (pending School District decision)

The proposed Specific Plan Amendment will continue to include construction of a new bridge crossing over the SR 78 freeway to provide direct access to the site from San Marcos Boulevard between SR 78 and Twin Oaks Valley Road. The proposed bridge crossing will be generally aligned with Westlake Drive, and a new signalized four-way intersection will be constructed at San Marcos Boulevard / Westlake Drive. An internal street network will be built throughout the project site, with access intersections provided on Discovery Street, Barham Drive, and Twin Oaks Valley Road. The project will also provide a third westbound lane on Barham Drive along the project frontage between Twin Oaks Valley Road and the eastern boundary of the project site.

In accordance with the original University District Specific Plan Traffic Impact Analysis (RBF 2009) the following 48 intersections were included in the traffic impact assessment:

- 1) Mission Road / Knoll Road
- 2) Mission Road / Pico Avenue
- 3) Las Posas Road / SR 78 Westbound Ramps
- 4) Las Posas Road / Grand Avenue
- 5) Via Vera Cruz / Grand Avenue
- 6) Via Vera Cruz / Linda Vista Drive
- 7) Bent Avenue / Grand Avenue
- 8) Knoll Road / Los Vallecitos Boulevard
- 9) San Marcos Boulevard / Rancho Santa Fe Road
- 10) San Marcos Boulevard / Discovery Street
- 11) San Marcos Boulevard / Las Posas Road
- 12) San Marcos Boulevard / Via Vera Cruz
- 13) San Marcos Boulevard / Bent Avenue
- 14) San Marcos Boulevard / Grand Avenue
- 15) San Marcos Boulevard / SR 78 Eastbound Ramps

- 16) San Marcos Boulevard / SR 78 Westbound Ramps-Knoll Road
- 17) San Marcos Boulevard / Westlake Drive
- 18) San Marcos Boulevard / Pico Avenue
- 19) San Marcos Boulevard / Twin Oaks Valley Road
- 20) San Marcos Boulevard / Rancheros Drive
- 21) San Marcos Boulevard-Vineyard Road / Mission Road
- 22) Discovery Street / La Sombra Drive
- 23) Discovery Street / Via Vera Cruz
- 24) Discovery Street / Bent Avenue-Craven Road (*only Bent in future*)
- 25) Discovery Street / Craven Road (*future intersection*)
- 26) Discovery Street / Grand Avenue (*future intersection*)
- 27) Discovery Street / Rush Drive (*future intersection*)
- 28) Discovery Street-Barham Drive / Twin Oaks Valley Road
- 29) Barham Drive / Campus Way
- 30) Barham Drive / La Moree Road
- 31) Barham Drive / Hill Street
- 32) Barham Drive / SR 78 Eastbound Off-Ramp
- 33) Barham Drive / Woodland Parkway
- 34) Woodland Parkway / Rancheros Drive
- 35) Rancheros Drive / SR 78 Westbound Ramps
- 36) Twin Oaks Valley Road / Borden Road
- 37) Twin Oaks Valley Road / Richmar Avenue
- 38) Twin Oaks Valley Road / SR 78 Westbound Ramps
- 39) Twin Oaks Valley Road / SR 78 Eastbound Ramps
- 40) Twin Oaks Valley Road / Carmel Street
- 41) Twin Oaks Valley Road / Campus Marketplace Driveway
- 42) Twin Oaks Valley Road / Craven Road
- 43) Craven Road / Rush Drive
- 44) Twin Oaks Valley Road / (North) Village Drive
- 45) Twin Oaks Valley Road / (South) Village Drive
- 46) Twin Oaks Valley Road / Street "C" (*Project Intersection*)
- 47) Discovery Street / Street "A" (*Project Intersection*)
- 48) Barham Drive / Street "E" (*Project Intersection*)

#### **Project Trip Generation**

**Table 4** presents the SANDAG trip generation rates that were used for the land uses associated with the proposed project.

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**Table 4. SANDAG Trip Generation Rates for Proposed Land Uses**

| Land Use                           | Unit     | Daily Trip Rate | AM Peak Rate | AM In | AM Out | PM Peak Rate | PM In | PM Out |
|------------------------------------|----------|-----------------|--------------|-------|--------|--------------|-------|--------|
| Mixed Use Multi-Family Residential | DU       | 6               | 8%           | 20%   | 80%    | 9%           | 70%   | 30%    |
| Mixed Use Community Commercial     | KSF      | 80.0            | 4%           | 60%   | 40%    | 10%          | 50%   | 50%    |
| Mixed Use Office                   | KSF      | 17              | 13%          | 90%   | 10%    | 14%          | 20%   | 80%    |
| Mixed Use Medical Office           | KSF      | 50.0            | 6%           | 80%   | 20%    | 11%          | 30%   | 70%    |
| Hotel                              | rooms    | 10              | 6%           | 60%   | 40%    | 8%           | 60%   | 40%    |
| Community Center (ITE)             | KSF      | 22.88           | 7%           | 61%   | 39%    | 7%           | 29%   | 71%    |
| Elementary School                  | students | 1.6             | 32%          | 60%   | 40%    | 9%           | 40%   | 60%    |

Source: SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002).

The trip generation estimated for the original UDSP is summarized in Table 5.

**Table 5. Original UDSP Project Trip Generation at Project Build-Out**

| Land Use                               | Intensity | Unit     | Daily Trips    | AM Trips     | AM In        | AM Out       | PM Trips      | PM In        | PM Out       |
|----------------------------------------|-----------|----------|----------------|--------------|--------------|--------------|---------------|--------------|--------------|
| Mixed Use Multi-Family Residential     | 3,400     | DU       | 20,400         | 1,632        | 326          | 1,306        | 1,836         | 1,285        | 551          |
| Mixed Use Community Commercial         | 1,000     | KSF      | 80,000         | 3,200        | 1,920        | 1,280        | 8,000         | 4,000        | 4,000        |
| Mixed Use Office                       | 750       | KSF      | 12,750         | 1,658        | 1,492        | 166          | 1,785         | 357          | 1,428        |
| Mixed Use Medical Office               | 300       | KSF      | 15,000         | 900          | 720          | 180          | 1,650         | 495          | 1,155        |
| Hotel                                  | 450       | rooms    | 4,500          | 270          | 162          | 108          | 360           | 216          | 144          |
| Community Center <sup>(2)</sup>        | 30        | KSF      | 686            | 49           | 30           | 19           | 49            | 14           | 35           |
| Elementary School                      | 850       | students | 1,360          | 435          | 261          | 174          | 122           | 49           | 73           |
| <i>Subtotal</i>                        |           |          | <b>134,696</b> | <b>8,143</b> | <b>4,911</b> | <b>3,232</b> | <b>13,803</b> | <b>6,416</b> | <b>7,386</b> |
| 10% Mixed Use Reduction <sup>(1)</sup> |           |          | -13,265        | -766         | -462         | -304         | -1,363        | -635         | -728         |
| 5% Transit Reduction                   |           |          | -6,735         | -407         | -246         | -162         | -690          | -321         | -369         |
| <b>NET PROJECT TRIPS</b>               |           |          | <b>114,697</b> | <b>6,970</b> | <b>4,203</b> | <b>2,767</b> | <b>11,749</b> | <b>5,460</b> | <b>6,289</b> |

<sup>(1)</sup> SANDAG allows a 10% trip rate reduction for mixed-use developments where residential and commercial are combined.

<sup>(2)</sup> SANDAG does not have a trip rate available for a Community Center; therefore, the ITE trip generation rate for Community Center was used instead. Source: Institute of Transportation Engineers (ITE) Trip Generation, 7<sup>th</sup> Edition, 2003.

**Table 6** presents the UDSPA project trip generation at project build-out. As shown in Table 6, at project build-out, the proposed UDSPA project is forecast to generate approximately 92,880 trips per day, with approximately 5,970 trips occurring during the a.m. peak hour, and 9,511 trips occurring during the p.m. peak hour. In comparison, the original UDSP project was estimated to generate approximately 114,697 trips per day, with approximately 6,970 trips occurring during the a.m. peak hour, and 11,749 trips occurring during the p.m. peak hour.

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**Table 6. Proposed UDSPA Project Trip Generation at Project Build-Out**

| Land Use                               | Intensity | Unit     | Daily Trips   | AM Trips     | AM In        | AM Out       | PM Trips     | PM In        | PM Out       |
|----------------------------------------|-----------|----------|---------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Mixed Use Multi-Family Residential     | 3,400     | DU       | 20,400        | 1,632        | 326          | 1,306        | 1,836        | 1,285        | 551          |
| Mixed Use Community Commercial         | 700       | KSF      | 56,000        | 2,240        | 1,344        | 896          | 5,600        | 2,800        | 2,800        |
| Mixed Use Office                       | 652       | KSF      | 11,084        | 1,441        | 1,297        | 144          | 1,552        | 310          | 1,241        |
| Mixed Use Medical Office               | 300       | KSF      | 15,000        | 900          | 720          | 180          | 1,650        | 495          | 1,155        |
| Hotel                                  | 450       | rooms    | 4,500         | 270          | 162          | 108          | 360          | 216          | 144          |
| Community Center                       | 30        | KSF      | 686           | 49           | 30           | 19           | 49           | 14           | 35           |
| Elementary School                      | 850       | students | 1,360         | 435          | 261          | 174          | 122          | 49           | 73           |
| Sub Total                              |           |          | 109,030       | 6,967        | 4,140        | 2,827        | 11,169       | 5,170        | 6,000        |
| 10% Mixed Use Reduction <sup>(1)</sup> |           |          | -10,698       | -648         | -385         | -263         | -1,100       | -511         | -589         |
| 5% Transit Reduction                   |           |          | -5,452        | -348         | -207         | -141         | -558         | -258         | -300         |
| <b>NET PROJECT TRIPS</b>               |           |          | <b>92,880</b> | <b>5,970</b> | <b>3,548</b> | <b>2,422</b> | <b>9,511</b> | <b>4,401</b> | <b>5,110</b> |

<sup>(1)</sup> SANDAG allows a 10% trip rate reduction for mixed-use developments where residential and commercial are combined.

<sup>(2)</sup> SANDAG does not have a trip rate available for a Community Center; therefore, the ITE trip generation rate for Community Center was used instead. Source: Institute of Transportation Engineers (ITE) Trip Generation, 7<sup>th</sup> Edition, 2003.

The trip generation comparison shows the UDSPA will reduce the UDSP daily and p.m. peak hour trips by 19 percent and the a.m. peak hour trips by 14 percent. The reduction in project trips on the west side portion of the project is 34 percent during the more critical p.m. peak while the reduction in project trips on the east side portion of the project is estimated at approximately 6 percent during the p.m. peak.

The analysis results and mitigation would be valid for any modifications to the land use yields that result in the same or less project trip generation during the more critical evening peak hour (e.g., 9,511 trips after mixed-use and transit reductions). It must also be noted that the residential trip generation calculation represents a “worst-case” condition. Since the project is considering including approximately 800 student housing units, this use is expected to generate significantly fewer trips per day than the standard multi-family dwelling unit.

Findings of the trip generation assessment for the proposed Specific Plan Amendment indicate that the proposed project will generate significantly fewer vehicle trips than the currently adopted UDSP. While the reduction in vehicle trips is a strong indicator that the traffic-related environmental impacts will likely be lower with the amendment than with the UDSP, further assessments and comparisons have been made related to the project traffic assignment within the study area.

#### **Project Trip Distribution**

The general distribution of project traffic is not anticipated to change significantly from the trip distribution reported for the original UDSP Traffic Impact Assessment (RBF 2009) since the project continues to be a mixed-use project with a significantly higher percentage of non-

residential trip generation. As with the original UDSP, the evening peak hour continues to have the highest portion of the daily project trips.

### **Project Trip Assignment**

Utilizing the project trip distribution identified in the original UDSP EIR Traffic Impact Analysis, the projected UDSPA project-generated trips were assigned to the roadway network. **Table 7** presents a trip generation comparison between the original UDSP and the proposed Specific Plan Amendment including the net reduction in vehicle trips that would result under the Specific Plan Amendment.

A comparison of project traffic assignments shown in Table 6 for the daily a.m. peak hour and p.m. peak hour, demonstrate that in all cases the UDSPA will result in fewer project trips on roadway segments and at intersections throughout the study area. As such, there is no possibility for the UDSPA project to introduce new off-site traffic impacts that were not identified in the original UDSP EIR Traffic Impact Analysis.

### **Horizon Year 2030 Significant Impact and Mitigation**

Although the proposed Specific Plan Amendment will have a lower level of traffic impact due to the lower trip generation, the project impacts would not be reduced below the level of significance. Furthermore, the applicant has agreed to maintain the same list of off-site mitigation measures that were identified in the original Traffic Impact Analysis.

The following 11 intersections were identified as being significantly impacted in the FEIR by the UDSP under Horizon Year 2030 conditions:

- Mission Road / Knoll Road
- San Marcos Blvd. / Rancho Santa Fe Road
- San Marcos Blvd. / Las Posas Road
- San Marcos Blvd. / Via Vera Cruz
- San Marcos Blvd. / Bent Avenue
- San Marcos Blvd. / Twin Oaks Valley Road
- Discovery Street / La Sombra Drive
- Barham Drive / La Moree Road
- Barham Drive / Woodland Parkway
- Twin Oaks Valley Road / Borden Road
- Twin Oaks Valley Road / SR 78 Eastbound Ramps

The following five roadway segments were identified as being significantly impacted in the FEIR by the UDSP under Horizon Year 2030 conditions:

- Discovery Street, from San Marcos Blvd. to La Sombra Drive
- Discovery Street, from La Sombra Drive to Via Vera Cruz
- Bent Avenue, from San Marcos Blvd. to Discovery Street
- Westlake Drive, North of San Marcos Blvd.
- Twin Oaks Valley Road, from Richmar Avenue to San Marcos Blvd.

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**Table 7. Daily Project Trip Comparison**

| Roadway          | Location                                 | Total Original UDSP Trips | Total Revised UDSP Trips | Reduction in Trips | % Reduction |
|------------------|------------------------------------------|---------------------------|--------------------------|--------------------|-------------|
| Mission Rd.      | Las Posas Rd. to Knoll Rd.               | 2,789                     | 2,002                    | -787               | 28%         |
|                  | Knoll Rd. to Pico Ave.                   | 231                       | 192                      | -39                | 17%         |
|                  | East of Vineyard Rd.                     | 2,515                     | 1,822                    | -693               | 28%         |
| San Marcos Blvd. | Rancho Santa Fe Rd. to Discovery St.     | 3,389                     | 2,570                    | -818               | 24%         |
|                  | Discovery St to Las Posas Rd.            | 0                         | 0                        | 0                  | 0%          |
|                  | Las Posas Rd. to Via Vera Cruz           | 1,031                     | 831                      | -201               | 19%         |
|                  | Via Vera Cruz to Bent Ave.               | 1,579                     | 1,189                    | -390               | 25%         |
|                  | Bent Ave. to Grand Ave.                  | 1,579                     | 1,189                    | -390               | 25%         |
|                  | Grand Ave. to SR 78 EB Ramps             | 0                         | 0                        | 0                  | 0%          |
|                  | SR 78 WB Ramps-Knoll Rd. to Westlake Dr. | 5,983                     | 4,160                    | -1,823             | 30%         |
|                  | Westlake Dr. to Pico Ave.                | 6,757                     | 4,599                    | -2,158             | 32%         |
|                  | Pico Ave. to Twin Oaks Valley Rd.        | 5,209                     | 3,627                    | -1,582             | 30%         |
|                  | Twin Oaks Valley Rd. to Rancheros Dr.    | 4,304                     | 3,304                    | -1,000             | 23%         |
|                  | Rancheros Dr. to Mission Rd.             | 2,515                     | 1,822                    | -693               | 28%         |
| Discovery Street | San Marcos Blvd. to La Sombra Dr.        | 3,573                     | 2,758                    | -815               | 23%         |
|                  | La Sombra Dr. to Via Vera Cruz           | 4,262                     | 3,318                    | -944               | 22%         |
|                  | Via Vera Cruz to Bent Ave./Craven Rd.    | 6,230                     | 4,782                    | -1,448             | 23%         |
|                  | Bent Ave./Craven Rd. to Grand Ave.       | 9,618                     | 7,352                    | -2,266             | 24%         |
|                  | Grand Ave. to Street "A"                 | 17,627                    | 13,392                   | -4,234             | 24%         |
|                  | Street "A" to Rush Dr.                   | 14,216                    | 11,471                   | -2,746             | 19%         |
|                  | Rush Dr. to Twin Oaks Valley Road        | 10,648                    | 9,466                    | -1,182             | 11%         |
| Barham Drive     | Twin Oaks Valley Rd. to Campus Way       | 12,694                    | 11,417                   | -1,277             | 10%         |
|                  | Campus Way to La Moree Rd.               | 11,615                    | 10,026                   | -1,589             | 14%         |
|                  | La Moree Rd. to Hill St.                 | 11,657                    | 10,193                   | -1,465             | 13%         |
|                  | Hill St. to SR 78 EB Ramps               | 13,919                    | 12,283                   | -1,636             | 12%         |
|                  | SR 78 EB Ramps to Woodland Pkwy.         | 10,458                    | 9,056                    | -1,402             | 13%         |
| Craven Rd.       | Discovery St. to Rush Dr.                | 484                       | 472                      | -12                | 2%          |
|                  | Rush Dr. to Twin Oaks Valley Road        | 2,673                     | 1,905                    | -768               | 29%         |
| Las Posas Rd.    | SR 78 to Grand Ave.                      | 0                         | 0                        | 0                  | 0%          |
| Via Vera Cruz    | Grand Ave. to Linda Vista Dr.            | 547                       | 358                      | -189               | 35%         |
|                  | Linda Vista Dr. to San Marcos Blvd.      | 821                       | 537                      | -284               | 35%         |
| Bent Ave.        | Grand Ave to San Marcos Blvd.            | 0                         | 0                        | 0                  | 0%          |
|                  | San Marcos Blvd. to Discovery St.        | 3,389                     | 2,570                    | -818               | 24%         |
| Grand Ave.       | Las Posas Rd. to Via Vera Cruz           | 894                       | 647                      | -247               | 28%         |
|                  | Via Vera Cruz to Bent Ave.               | 1,210                     | 813                      | -398               | 33%         |
|                  | Bent Ave. to San Marcos Blvd.            | 2,357                     | 1,740                    | -618               | 26%         |
|                  | San Marcos Blvd. to Discovery St.        | 6,088                     | 4,581                    | -1,507             | 25%         |
| Knoll Rd.        | Mission Rd. to Los Vallecitos Blvd.      | 2,673                     | 1,905                    | -768               | 29%         |
|                  | Los Vallecitos Blvd. to San Marcos Blvd. | 1,579                     | 1,189                    | -390               | 25%         |
| Westlake Dr.     | North of San Marcos Blvd.                | 3,704                     | 2,736                    | -968               | 26%         |
|                  | South of San Marcos Blvd.                | 17,081                    | 11,939                   | -5,142             | 30%         |

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| Roadway              | Location                                   | Total  | Total  | Reduction | %   |
|----------------------|--------------------------------------------|--------|--------|-----------|-----|
| Pico Ave.            | Mission Rd to San Marcos Blvd.             | 1,326  | 909    | -417      | 31% |
| Rush Dr.             | Discovery St. to Craven Rd.                | 4,920  | 3,754  | -1,165    | 24% |
| Twin Oaks Valley Rd. | Borden Road to Richmar Ave.                | 5,556  | 4,652  | -904      | 16% |
|                      | Richmar Ave. to San Marcos Blvd.           | 7,071  | 5,954  | -1,117    | 16% |
|                      | San Marcos Blvd. to SR 78 Ramps            | 7,828  | 7,153  | -674      | 9%  |
|                      | SR 78 Ramps to Street "C"                  | 22,107 | 18,510 | -3,597    | 16% |
|                      | Street "C" to Barham Dr./Discovery St.     | 13,694 | 11,953 | -1,741    | 13% |
|                      | Barham Dr./Discovery St. to Craven Rd.     | 7,181  | 6,213  | -969      | 13% |
|                      | Craven Rd. to (North) Village Dr.          | 7,250  | 5,937  | -1,313    | 18% |
|                      | (North) Village Dr. to (South) Village Dr. | 5,829  | 4,831  | -999      | 17% |
|                      | South of (South) Village Dr.               | 5,645  | 4,643  | -1,003    | 18% |
| Woodland Pkwy.       | Rancheros Dr. to Barham Dr.                | 5,629  | 4,933  | -696      | 12% |
| Street "A"           | Discovery St. to Street "B"                | 7,167  | 4,868  | -2,299    | 32% |
|                      | Street "B" to Westlake                     | 5,804  | 4,178  | -1,626    | 28% |
|                      | Westlake to Street "C"                     | 10,203 | 7,679  | -2,523    | 25% |
| Street "B"           | Street "A" to Westlake                     | 6,620  | 4,510  | -2,110    | 32% |
|                      | Westlake to Street "C"                     | 14,334 | 9,736  | -4,599    | 32% |
| Street "C"           | Rush Dr. to Street "B"                     | 12,588 | 8,240  | -4,347    | 35% |
|                      | Street "B" to Street "A"                   | 10,745 | 7,832  | -2,913    | 27% |
|                      | Street "A" to Twin Oaks Valley Rd.         | 19,779 | 15,233 | -4,546    | 23% |
|                      | Twin Oaks Valley Rd. to Street "D"         | 23,953 | 20,956 | -2,997    | 13% |
|                      | Street "D" to Industrial St.               | 16,597 | 14,566 | -2,031    | 12% |
| Street "D"           | Street "C" to Barham Dr.                   | 11,710 | 10,983 | -727      | 6%  |

Mitigation measures have been identified for all of the above-listed intersections and roadway segments in the adopted FEIR (TR-1 through TR-32). Implementation of these mitigation measures will still be required under the proposed Specific Plan Amendment.

The recommended mitigation measures for each significantly impacted intersection and roadway segment under Horizon Year 2030 conditions are described in detail below:

#### **Recommended Horizon Year 2030 Intersection Improvements**

##### **Mission Road / Knoll Road**

- Northbound: Restripe approach to provide one left-turn lane, one shared left-turn/through/right-turn lane, and one right-turn lane.

##### **San Marcos Boulevard / Rancho Santa Fe Road**

- Westbound: Provide a third left-turn lane.

The recommended improvements at San Marcos Boulevard / Rancho Santa Fe Road would reduce the significant impact by reducing the average intersection delay to lower than the delay without the project. Improving intersection operations to an acceptable level of service would require additional widening at the intersection approaches to increase capacity, which may not be feasible due to development constraints.

### San Marcos Boulevard / Las Posas Road

- Northbound: Restripe approach to provide one left-turn lane, one shared left-turn/through lane, and one shared through/right-turn lane.
- Southbound: Provide a second right-turn lane. Modify signal to provide right-turn overlap phase. Prohibit u-turns during the corresponding eastbound left-turn phase.
- Convert signal phasing to split phasing for the northbound and southbound approaches.

### San Marcos Boulevard / Via Vera Cruz

- Southbound: Reduce existing dual left-turn lanes to a single left-turn lane; restripe approach to provide one left-turn lane, one through lane, and one shared through/right-turn lane.
- Eastbound: Provide a dedicated right-turn lane.

### San Marcos Boulevard / Bent Avenue

- Convert signal phasing to split phasing for the northbound and southbound approaches.
- Northbound: Restripe approach to provide one left-turn lane, one shared left-turn/through lane, and one right-turn lane.
- Southbound: Restripe approach to provide one left-turn lane, one shared left-turn/through lane, and one right-turn lane.
- Westbound: Provide a second left-turn lane.

### San Marcos Boulevard / Twin Oaks Valley Road

- Northbound: Modify signal to provide right-turn overlap phase. Prohibit u-turns during the corresponding westbound left-turn phase.
- Southbound: Provide a dedicated right-turn lane.
- Westbound: Provide a third left-turn lane.

### Discovery Street / La Sombra Drive

- Install traffic signal and provide the following lane geometries:
  - Northbound: Provide one shared through/right-turn lane (*same as existing conditions*).
  - Southbound: Restripe approach to provide one left-turn lane and one shared left-turn/through lane.
  - Westbound: Restripe approach to provide one left-turn lane and one right-turn lane. Provide a right-turn overlap phase.
  - Provide split phasing for the northbound and southbound approaches.

### Barham Drive / La Moree Road (West)

- Northbound: Modify signal to provide right-turn overlap phase. Prohibit u-turns during the corresponding westbound left-turn phase.
- Southbound: Restripe approach to provide one left-turn lane and one shared through/right-turn lane.

### **Barham Drive / Woodland Parkway**

- Westbound: Modify signal to provide right-turn overlap phase. Prohibit u-turns during the corresponding southbound left-turn phase.

### **Twin Oaks Valley Road / Borden Road**

- Eastbound: Modify signal to provide right-turn overlap phase. Prohibit u-turns during the corresponding northbound left-turn phase.

### **Twin Oaks Valley Road / SR 78 Eastbound Ramps**

- Eastbound (Off-Ramp Approach): Restripe approach to provide one left-turn lane, one shared left-turn/through/right-turn lane, and one right-turn lane. (Note that this improvement has already been implemented by the City of San Marcos.)

### **Recommended Horizon Year 2030 Roadway Segment Improvements**

#### **Discovery Street, from San Marcos Boulevard to La Sombra Drive**

- Improve roadway segment to four-lane Secondary Arterial standards.

#### **Discovery Street, from La Sombra Drive to Via Vera Cruz**

- Improve roadway segment to four-lane Secondary Arterial standards.

The current City Circulation Element now has different designations for 4-lane roadways and the future widening of Discovery Street should be consistent with the current Circulation Element design standards.

#### **Bent Avenue, from San Marcos Boulevard to Main Street (Creekside District)**

- Improve roadway segment to four-lane roadway standards.

The City Circulation Element classifies Bent Avenue as a two-lane roadway between San Marcos Boulevard and Discovery Street. The addition of traffic from the Creekside District Specific Plan project and other larger-scale projects results in daily roadway segment operations worsening to LOS F by Year 2030. The forecast Year 2030 ADT volume of 11,900 on Bent Avenue between San Marcos Boulevard and Discovery Street is an average of daily volumes along shorter segments within the Creekside District project, with the highest daily volume between San Marcos Boulevard and Main Street, and the lowest daily volume between Creekside Drive and Discovery Street. It is recommended that Bent Avenue from San Marcos Boulevard to Main Street be improved to four-lane roadway standards.

#### **Bent Avenue, from Main Street (Creekside District) to Discovery Street**

- Upgrade roadway segment to a two-lane roadway with continuous two-way left-turn lane (TWLTL).

The existing daily capacity of Bent Avenue between San Marcos Boulevard and Discovery Street of 8,000 ADT is based on its current pavement width. Although Bent Avenue south of Main Street can remain with two travel lanes to operate at LOS D or better, it is recommended that Bent Avenue from Main Street to Discovery Street be improved to a two-lane roadway with a continuous two-way left-turn lane (TWLTL).

#### **Westlake Drive, North of San Marcos Boulevard**

- Improve Westlake Drive from Dusty Lane to San Marcos Boulevard to a two-lane roadway with a two-way left-turn lane.

*Note:* This improvement can most likely be accommodated without physical widening; however, on-street parking would need to be prohibited to restripe the roadway as recommended.

#### **Twin Oaks Valley Road, from Richmar Avenue to San Marcos Boulevard**

- Improve intersection of Twin Oaks Valley Road / San Marcos Boulevard to provide peak hour operations at LOS D or better. The recommended improvements at Twin Oaks Valley Road / San Marcos Boulevard will also serve to mitigate the significant impact on this segment of Twin Oaks Valley Road.

This 4-lane segment is completely access-controlled between the two intersections at either end and it is the operations of these two intersections during the peak hours that would most influence operations on this roadway segment. A close look at the peak hour directional volumes on this segment of Twin Oaks Valley Road showed that during the peak hours, a maximum of 1,600 vehicles would travel between Richmar Avenue and San Marcos Boulevard, or approximately 800 vehicles per lane. This is equivalent to the directional volumes per lane on most segments of San Marcos Boulevard, which are forecast to have daily operations at LOS D or better.

**Table 8** and **Table 9** summarize the recommended Horizon Year 2030 mitigation measures for the impacted intersection and roadway segment locations, respectively, as described above. As previously noted, all of these segments and intersections were identified as impacted in the FEIR for the UDSP.

#### **Onsite Circulation and Traffic Operations Analysis**

The planned onsite roadway network for the proposed Specific Plan Amendment is depicted in Figure 3A. The configuration of the East Side roadway network is similar to the network identified in the original UDSP with the following differences:

- Main Street (east-west spine) terminates just west of Campus Way at Redel Road instead of connecting to Industrial Street.
- Campus Way has been extended north of Main Street to connect to Carmel Street.
- Street E (north-south street) has been added west of and parallel to Campus Way and this street extends from Barham Drive to new Street A north of Main Street.
- Street A has been added north of and parallel to Main Street and connects Street E to Campus Way.
- The configuration of the East Side roadway network is similar to the original UDSP in terms of the layout of Street B, Street D, and Street F. The southern terminus of Street B has been relocated to the east of Rush Drive due to topographic constraints. The configuration of Street C is somewhat different in that it loops back to Street D at Street F instead of continuing east to Street B. This change to Street C has also resulted in the elimination of the one-way couplet that was included in the original UDSP.

Urban Systems Associates (USA) completed the University District Specific Plan On-Site Traffic Study. This study analyzes traffic operations and roadway and intersection requirements for the planned UDSP project. The complete USA report is included as an attachment to the Traffic Impact Study (Appendix C of this document).

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Table 8. Summary of Horizon Year 2030 Mitigation Measures - Study Intersections

| Intersection                            | Recommended Mitigation Measure |         |
|-----------------------------------------|--------------------------------|---------|
|                                         | 2030 NP                        | 2030 WP |
| Mission Rd. / Knoll Rd.                 |                                | X       |
| San Marcos Blvd. / Rancho Santa Fe Rd.  | X                              | X       |
| San Marcos Blvd. / Las Posas Rd.        | X                              | X       |
| San Marcos Blvd. / Via Vera Cruz        | X                              | X       |
| San Marcos Blvd. / Bent Ave.            | X                              | X       |
| San Marcos Blvd. / Twin Oaks Valley Rd. | X                              | X       |
| Discovery St. / La Sombra Dr.           | X                              | X       |
| Barham Dr. / La Moree Rd.               | X                              | X       |
| Barham Dr. / Woodland Pkwy.             |                                | X       |
| Twin Oaks Valley Rd. / Borden Rd.       |                                | X       |
| Twin Oaks Valley Rd. / SR 78 EB Ramps   | X                              | X       |

Notes: 2030 NP = Year 2030 Without Project  
2030 WP = Year 2030 With Project (Specific Plan Land Uses)

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Table 9. Summary of Horizon Year 2030 Mitigation Measures - Study Roadway Segments

| Roadway Segment                                             | Recommended Mitigation Measure |         |
|-------------------------------------------------------------|--------------------------------|---------|
|                                                             | 2030 NP                        | 2030 WP |
| Discovery St., from San Marcos Blvd. to La Sombra Dr.       | X                              | X       |
| Discovery St., from La Sombra Dr. to Via Vera Cruz          | X                              | X       |
| From San Marcos Blvd. to Main St.                           | X                              | X       |
| From Main St. to Discovery St.                              | X                              | X       |
| Westlake Dr., North of San Marcos Blvd. Bent Ave.           |                                | X       |
| Twin Oaks Valley Rd., from Richmar Ave. to San Marcos Blvd. | X                              | X       |

Notes: 2030 NP = Year 2030 Without Project

2030 WP = Year 2030 With Project

TWLT = Two-Way Left-Turn Lane

Improve to four-lane roadway.  
Improve to four-lane roadway.  
Improve to four-lane roadway.  
Improve to two-lane roadway with TWLT.  
Improve to two-lane roadway with TWLT.  
Improve intersection of Twin Valley Rd. / San Marcos Blvd. to provide LOS D or better peak hour operations (see Table 11 for recommended improvements at this intersection).

The on-site traffic analysis includes assessments of:

- Project traffic generation;
- Project traffic distribution and assignment;
- Intersection and roadway segment traffic operations; and
- Intersection and roadway geometrics needed to accommodate project traffic circulation.

The USA traffic analysis included an evaluation of all on-site intersections as well as all of the primary access intersections around the perimeter of the project site. The on-site traffic analysis determined that all of the intersection and roadway segments would operate at Level of Service D or better during the more critical evening peak hour with traffic lane configurations.

### **Mitigation Phasing Analysis**

RBF (2014) conducted an analysis to evaluate the phasing requirements of the mitigation measures identified in the original EIR traffic impact analysis (RBF 2009) 2030 scenario with the project as well as the proposed phasing needs of new planned roadways such as the Discovery Street extension from Craven Road to Twin Oaks Valley Road and the new Westlake Drive bridge crossing.

In the original EIR Traffic Impact Analysis, a five-year (year 2015) and ten-year (year 2020) analysis was performed to aid in the assessment of the timing of traffic mitigation measures. The use of development timing assumptions did not prove to be an effective method of establishing the timing of mitigation measures. In the updated analysis, the timing of mitigation measures is correlated to the number of vehicle trips that are generated by the project and how those trips would impact the need for the identified mitigation measures.

To update the phasing analysis of mitigation measure improvements, several factors were considered including:

- Current traffic volumes at the intersections that are impacted by the project.
- Estimated traffic associated with City of San Marcos approved or pending projects.
- The City's current Capital Improvement Program (CIP) transportation projects and the anticipated timing of those projects.
- Findings of the original mitigation phasing analysis that was performed for interim 5 and 10-year forecast periods (e.g., 2015 and 2020)
- Estimated traffic associated with the UDSPA

The phasing analysis also included a review of the updated 2030 traffic forecast from the SANDAG Series 11 North County Traffic Model. This model includes the most up to date information relative to the City's General Plan land use and circulation element. The current City Circulation Element plans to construct San Marcos Boulevard as a four-lane multi-way boulevard.

The traffic model was updated to include the most current information for key approved and pending specific plan projects in the study area vicinity. A brief summary of the area specific plan project assumptions is as follows:

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- University District Specific Plan – Land use and trip generation was updated to reflect the currently proposed Specific Plan Amendment
- Creekside District Specific Plan - Land use and trip generation was updated to reflect the Final EIR Addendum dated 2011.
- Fenton Project Specific Plan – Land use is conservatively assumed to remain as primarily Business Park use as was assumed in the original traffic impact analysis.
- Kaiser Permanente Medical Center Specific Plan – Land use and trip generation is conservatively assumed to include a new hospital facility.
- Rancho Coronado Specific Plan – Land use and trip generation assumes the changes proposed in the recent Specific Plan Amendment.

For reference purposes, the current transportation projects included in the City's CIP are summarized in **Table 10**.

#### **Intersection Mitigation Phasing**

The results of the mitigation phasing analysis for mitigation measures at study area intersections are summarized in **Table 11**. The analysis has determined the maximum level of project trip generation that can occur before each mitigation measure must be constructed. In all cases, the project trip generation threshold applies to the number of trips generated during the more critical p.m. peak hour.

Also noted, is whether there is a CIP transportation project that is related to the mitigation measure and the currently programmed timing for the transportation project. In some cases, the UDSPA mitigation measure would be a component of the planned transportation project and coordination would be required. In these cases, the schedule of the CIP project would dictate the timing of the mitigation measure implementation. In other cases, the completion of the CIP transportation project would influence travel patterns in a manner that would accelerate the need for the mitigation measure. In these cases, the schedule of the CIP project would also dictate the need to implement the mitigation measure and this may be in advance of reaching the project trip generation threshold identified. While the timing of the related CIP Transportation project could be in advance of reaching the project trip generation threshold identified herein, the project would need to participate on a "fair share" basis to the cost of the mitigation measure at the time of the CIP project construction.

#### **Roadway Segment Mitigation Phasing**

The results of the mitigation phasing analysis for mitigation measures on study area roadway segments are summarized in **Table 12**. It should be noted that the extension of Discovery Street from Rush Street to Bent Street occurs at the first trip generation threshold level (760 total, 350 inbound, 410 outbound p.m. peak hour project trips) and this improvement is related to the CIP transportation construction project identified for Discovery Street between 2017 and 2019. The updated analysis indicates that Discovery should be constructed as a four-lane divided roadway from Bent to Rush Street and as a six-lane divided roadway from Rush Street to Discovery. The extension of Grand Avenue to Discovery could be delayed until the project meets the second trip generation threshold level (1,760 total, 795 inbound, 915 outbound p.m. peak hour project trips).

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**Table 10. City of San Marcos Capital Improvement Program Transportation Projects**

| ID#       | Roadway Name                | From                 | To                       | Improvement                                 | Start of Construction (Year) | Project Open to Traffic (Year) |
|-----------|-----------------------------|----------------------|--------------------------|---------------------------------------------|------------------------------|--------------------------------|
| SM1       | South Santa Fe Avenue       | Bosstick Boulevard   | Smilax Rd.               | Realign & Signalize the Intersection        | 2017                         | 2018                           |
| SM2       | Woodland Parkway            | La Moree Rd.         | Rancheros Boulevard      | Interchange Improvements w/ Barham Widening | 2017                         | 2019                           |
| SM3       | Discovery St.               | Via Vera Cruz Rd.    | Bent Avenue/Craven Rd.   | Widen Roadway                               | 2017                         | 2019                           |
| SM4       | Via Vera Cruz Rd.           | San Marcos Blvd.     | Discovery Street         | Street Improvements                         | 2017                         | 2019                           |
| SM5       | Discovery Street            | Craven Rd.           | Twin Oaks Valley Rd.     | Street Improvements                         | 2017                         | 2019                           |
| SM6       | Barham Dr.                  | Twin Oaks Valley Rd. | La Moree Rd.             | Widen Roadway                               | 2018                         | 2019                           |
| SM7       | Creekside Dr.               | Via Vera Cruz Rd.    | Grand Avenue             | Street Improvements                         | 2018                         | 2019                           |
| SM8       | Borden Rd.                  | Mulberry Rd.         | Vineyard Rd.             | Street Reconstruction                       | 2018                         | 2019                           |
| SM9       | Borden Rd.                  | Wulff St.            | Redhill Ln.              | Street Widening                             | 2018                         | 2019                           |
| SM10      | E. La Moree Rd.             | Williamsburg Dev.    | Sandy Ln.                | Street Widening                             | 2018                         | 2019                           |
| SM11      | Twin Oaks Valley Rd.        | Buena Creek Rd.      | Sycamore Dr.             | Street Widening                             | 2019                         | 2020                           |
| SM12      | Twin Oaks Valley Rd.        | La Cienega Rd.       | Cassou Rd.               | Street Improvements                         | 2019                         | 2020                           |
| SM13      | Twin Oaks Valley Rd.        | Cassou Rd.           | Buena Creek Rd.          | Street Improvements                         | 2019                         | 2020                           |
| SM14      | Richland Rd.                | Borden Rd.           | Rock Springs Rd.         | Street Improvements                         | 2020                         | 2021                           |
| SM15/SM16 | Rancho Santa Fe Interchange | & SR78               | & SR78                   | Interchange Improvements                    | 2020                         | 2021                           |
| SM17      | Rancho Santa Fe Rd.         | South Santa Fe Rd.   | Grand Ave                | Street Improvements                         | 2020                         | 2021                           |
| SM18      | Richmar Ave.                | Twin Oaks Valley Rd. | Woodward St              | Street Improvements                         | 2020                         | 2021                           |
| SM19      | San Marcos Blvd.            | Knoll Rd.            | Pico Ave.                | Street Widening                             | 2020                         | 2021                           |
| SM20      | Rancho Santa Fe Rd.         | Grand Ave.           | San Marcos Blvd.         | Street Widening                             | 2020                         | 2021                           |
| SM21      | Borden Rd.                  | Via Barquero         | Palomar College Entrance | Street Widening                             | 2020                         | 2021                           |
| SM22      | Mulberry Dr.                | Woodward St          | Olive St.                | Street Widening                             | 2020                         | 2021                           |
| SM23      | San Marcos Boulevard        | Discovery St.        | Bent Ave.                | Street Improvements                         | 2025                         | 2027                           |

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**Table 11. Summary of Mitigation Measure Phasing Requirements - Intersection Improvements**

| Intersection                          | Project Trip Generation Threshold                  | Required Coordination w/ CIP Project Construction Period | Recommended Mitigation Measure                                                                                                                                                                                                                                                                                                           |
|---------------------------------------|----------------------------------------------------|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Twin Oaks Valley Rd. / SR-78 EB Ramps | 760 PM Peak Hr.<br>Inbound: 350<br>Outbound: 410   |                                                          | EB: Restripe approach to provide 1 left-turn lane, 1 shared left-turn / through / right-turn lane, and 1 right-turn lane.<br>(Note: This improvement has already been implemented)                                                                                                                                                       |
| San Marcos Blvd. / Via Vera Cruz      | 760 PM Peak Hr.<br>Inbound: 350<br>Outbound: 410   | SM4<br>(Est. 2017 – 2019)                                | SB: Restripe approach to provide 1 left-turn lane, 1 through lane, 1 shared through / right-turn lane.<br>EB: Provide a dedicated right-turn lane.                                                                                                                                                                                       |
| San Marcos Blvd. / Bent Ave.          | 760 PM Peak Hr.<br>Inbound: 350<br>Outbound: 410   | SM3 & SM5<br>(Est. 2017 – 2019)                          | Convert NB and SB signal phasing to split phasing.<br>NB: Restripe approach to provide 1 left-turn lane, 1 shared left-turn / through lane, and 1 right-turn lane.<br>SB: Restripe approach to provide 1 left-turn lane, 1 shared left-turn / through lane, and 1 right-turn lane.<br>WB: Provide a second left-turn lane.               |
| San Marcos Blvd. / Las Posas Rd.      | 760 PM Peak Hr.<br>Inbound: 350<br>Outbound: 410   |                                                          | Convert NB and SB signal phasing to split phasing.<br>NB: Restripe approach to provide 1 left-turn lane, 1 shared left-turn / through lane, and 1 shared through / right-turn lane.<br>SB: Provide a second right-turn lane, and modify signal to provide a right-turn overlap phase.                                                    |
| Barham Dr. / La Moree Rd.             | 760 PM Peak Hr.<br>Inbound: 350<br>Outbound: 410   | SM6<br>(Est. 2018 – 2019)                                | NB: Modify signal to provide a right-turn overlap phase.<br>SB: Provide 1 left-turn lane and 1 shared through/right-turn lane.                                                                                                                                                                                                           |
| Discovery St. / La Sombra Dr.         | 1,760 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 | SM3 & SM5<br>(Est. 2017 – 2019)                          | Install traffic signal. Provide split phasing at NB and SB approaches.<br>NB: No changes to existing lane geometry.<br>SB: Restripe approach to provide 1 left-turn lane and 1 shared left-turn / through lane.<br>WB: Restripe approach to provide a dedicated left-turn lane, and modify signal to provide a right-turn overlap phase. |
| Barham Dr. / Woodland Pkwy.           | 1,760 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 | SM2<br>(Est. 2017 – 2019)                                | WB: Modify signal to provide a right-turn overlap phase.                                                                                                                                                                                                                                                                                 |

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| Intersection                            | Project Trip Generation Threshold                  | Required Coordination w/ CIP Project Construction Period | Recommended Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------|----------------------------------------------------|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Twin Oaks Valley Rd. / Borden Rd.       | 1,760 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 | SM8 & SM9<br>(Est. 2018 – 2019)                          | EB: Modify signal to provide a right-turn overlap phase.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| San Marcos Blvd. / Grand Ave.           | 1,760 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 | SM5<br>(Est. 2017 – 2019)                                | NB: Convert signal phasing to protected left-turns. Restripe approach to provide two left-turn lanes, one through lane, and one right-turn lane.<br>SB: Convert signal phasing to protected left-turns. Restripe approach to provide two left-turn lanes, one through lane, and one shared through/right-turn lane.<br>EB: Reduce existing dual left-turn lane to a single left-turn lane. Restripe approach to provide three through lanes and one shared through/right-turn lane.<br>(Note: Some of these improvements have already been implemented) |
| San Marcos Blvd. / Twin Oaks Valley Rd. | 1,760 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 | SM19<br>(Est. 2020 – 2021)                               | NB: Modify signal to provide a right-turn overlap phase.<br>SB: Provide a dedicated right-turn lane.<br>WB: Provide a third left-turn lane.                                                                                                                                                                                                                                                                                                                                                                                                             |
| San Marcos Blvd. / Rancho Santa Fe Rd   | 1,760 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 | SM20<br>(Est. 2020 – 2021)                               | WB: Provide a third left-turn lane.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Mission Rd. / Knoll Rd.                 | 2,855 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 |                                                          | NB: Restripe approach to provide 1 left-turn lane, 1 shared left-turn / through / right-turn lane, and 1 right-turn lane.                                                                                                                                                                                                                                                                                                                                                                                                                               |

**Note:** Mitigation measure is required prior to project trip threshold being exceeded or completion of related CIP project, whichever occurs first.

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**Table 12. Summary of Mitigation Measure Phasing Requirements - Roadway Improvements**

| Roadway Segment                                                                       | Project Trip Generation Threshold                  | Required Coordination w/ CIP Project Construction Period | Recommended Mitigation Measure                                                                                                                                                       |
|---------------------------------------------------------------------------------------|----------------------------------------------------|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bent Ave. from San Marcos Blvd. to Main St.                                           | 760 PM Peak Hr.<br>Inbound: 350<br>Outbound: 410   | SM5<br>(Est. 2017 -2019)                                 | Improve to four-lane roadway                                                                                                                                                         |
| Bent Ave. from Main St. to Discovery St.                                              | 760 PM Peak Hr.<br>Inbound: 350<br>Outbound: 410   | SM5<br>(Est. 2017 -2019)                                 | Improve to two-lane roadway with TWLTL.                                                                                                                                              |
| Discovery St., from San Marcos Blvd. to La Sombra Dr.                                 | 1,760 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 | SM3 & SM5<br>(Est. 2017 -2019)                           | Improve to four-lane roadway                                                                                                                                                         |
| Discovery St., from La Sombra Dr. to Via Vera Cruz                                    | 1,760 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 | SM3 & SM5<br>(Est. 2017 -2019)                           | Improve to four-lane roadway                                                                                                                                                         |
| Twin Oaks Valley Rd., from Richmar Ave. to San Marcos Blvd.                           | 1,760 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 |                                                          | Improve intersection of Twin Valley Rd. / San Marcos Blvd. to provide LOS D or better peak hour operations (see Table 5 for recommended improvements at this intersection).          |
| Westlake Dr. Bridge from San Marcos Blvd. to Project Street D on West Side of Project | 2,855 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 |                                                          | Construct minimum two-lane bridge. Monitor directional peak hour volume and widen to four lanes if single direction volume reaches 800 vehicles per hour prior to project build-out. |
| Westlake Dr., North of San Marcos Blvd.                                               | 2,855 PM Peak Hr.<br>Inbound: 795<br>Outbound: 915 |                                                          | Improve to two-lane roadway with TWLTL.                                                                                                                                              |

**Note:** Mitigation measure is required prior to project trip threshold being exceeded or completion of related CIP project, whichever occurs first.

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Based upon the Traffic Impact assessment prepared by RBF (2014), the Specific Plan Amendment will not result in any new traffic impact or a severity of impacts.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**b) *Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, other standards established by the county congestion management agency for designation roads or highways?***

**FEIR Conclusion: Less than Significant.** The UDSP was determined to be consistent with the applicable transportation and traffic related goals, policies, and implementing strategies (FEIR Page 3.13-49).

**Discussion of the Specific Plan Amendment:** See analysis presented in Section 3.3.16(a). Traffic generation under the proposed Specific Plan Amendment would be reduced compared to the project analyzed in the FEIR, since the development intensity would decrease. Therefore, the proposed Specific Plan Amendment would contribute even fewer vehicles to the freeway and area roadways, intersections and freeway segments/ramps. Thus, the conclusions of the FEIR are still appropriate and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**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?***

**FEIR Conclusion: No Impact.** McClellan-Palomar Airport is the nearest airport and is located approximately five miles west of the proposed project. As discussed in the FEIR (page 3.6.5) the project site is located outside the over-flight notification area, but is located within the Review Area 2 of the airport influence area. The influence area is regulated by the ALUC, which regulates land uses in the area to be compatibility with airport-related noise, safety, airspace protection, and over-flight factors. Review Area 2 consists of limits on heights of structures in areas of high terrain. The UDSP project site would not be characterized as high terrain, as it is situated in a valley, with higher topography to the south. No impact was identified in the FEIR and no mitigation was proposed.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would not result in any change to air traffic patterns. Therefore, the previous conclusion of no impact for this issue area is still applicable to the proposed Specific Plan Amendment and no new impacts are identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**d) *Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

**FEIR Conclusion: Less than Significant Impact.** The Initial Study for the FEIR (Appendix A.2 of the FEIR) did not identify any hazards related to design features or incompatible uses. Impacts were determined to be less than significant.

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**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment would still require roadway improvements, though the location of some of the internal roadways to the Specific Plan will change. All roads constructed in association with the proposed Specific Plan Amendment would be constructed within City standards and safety specifications. Therefore, no impacts are identified for the proposed Specific Plan Amendment for this issue area. This is similar to the conclusion in the FEIR.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**e) Result in inadequate emergency access?**

**FEIR Conclusion: No Impact.** The Initial Study of the FEIR (Appendix A.2 of the FEIR) did not identify any impacts related to emergency access.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment does not result in any issues related to emergency access. As future projects come forward within the Specific Plan area, they would be subject to review by the Fire Department and Fire Marshal. There are no new impacts for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease performance or safety of such facilities?**

**FEIR Conclusion: No Impact.** The Initial Study of the FEIR (Appendix A.2 of the FEIR) did not identify any conflicts with policies, plans, or programs to support alternative transportation.

**Discussion of the Specific Plan Amendment:** The proposed project makes some changes to the roadway configurations within the UDSP. However, the UDSP will still maintain a transit- and pedestrian-oriented development pattern, which provides convenient access to the SPRINTER and bus service. The proposed Specific Plan Amendment would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or otherwise decrease performance or safety of such facilities. Therefore, no impact is identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

#### 17. Utilities and Service Systems – Would the project:

**a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

**FEIR Conclusion: No Impact.** The FEIR (page 3.14-6) concluded that Vallecitos Water District (VWD) would service the future development within the UDSP area for wastewater and reclamation services. The UDSP would increase wastewater flow by 791,116 gallons per day (gpd) over the existing land uses. As part of mitigation measure US-6, the future developer of the site is required to pay a fair share contribution for the Encina Water Pollution Control Facility and Meadowlark Water Reclamation Facility (MWRF). The FEIR concluded that there was no impact for this issue area.

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**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would decrease the level of development. This results in a proportional reduction in the need for wastewater treatment capacity. The project developer would still be required to pay a fair share contribution for the Encina Water Pollution Control Facility and Meadowlark Water Reclamation Facility (MWRF). The conclusions of the FEIR are adequate for the proposed Specific Plan Amendment and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**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?***

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (pages 3.14-8 through 3.14-18) analyzed the potential for the UDSP project to impact water and wastewater infrastructure due to additional residential, student housing, hotel and commercial business development. The FEIR concluded that additional development would increase demands on water and wastewater treatment facilities and require regional infrastructure improvements to accommodate the increases. Mitigation measures US-4 through US-6 were identified in the FEIR to reduce the impact to below a level of significance.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would decrease the level of development intensity. This results in a proportional reduction in the need for potable water supplies and water and sewer conveyance facilities. Impacts will be less than significant and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**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?***

**FEIR Conclusion: Less than Significant.** The FEIR prepared for the UDSP did not identify any impacts related to stormwater drainage facilities. The Final EIR concluded that the combination of project infrastructure and onsite detention feature from future Specific Plan development would ensure that impacts are less than significant.

**Discussion of the Specific Plan Amendment:** The overall drainage concept for the project area remains the same under the proposed Specific Plan Amendment. The FEIR adequately analyzed this issue area, and no new impacts associated with the proposed Specific Plan Amendment are anticipated. Please see Section 3.3.9 of this document that addresses the hydrology and water quality aspects of the proposed Specific Plan Amendment.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.14-28) determined that water impacts would be significant, and improvements are required for water storage and water infrastructure to accommodate the increase in demand due to the proposed

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project. Mitigation measures US-1 through US-3 will provide water pipeline improvements and payment of fees towards the provision of additional water storage. By improving infrastructure and increasing storage, impacts would be reduced to below a level of significance.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still generate a demand for potable water service from VWD; however, development under the proposed Specific Plan Amendment would decrease. Therefore, there will be less demand for water compared to what was analyzed in the FEIR. Thus the FEIR was more conservative in its analysis. No new impact is identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**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?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.14-28) determined that wastewater impacts would be significant and infrastructure and treatment facility improvements are required for the UDSP project. Implementation of mitigation measures US-4 through US-6 required the future developer to participate in regional infrastructure improvements to accommodate the increase in wastewater flows. Additionally, payment of fees towards increased wastewater treatment capacity would ensure that adequate services are available for the proposed project. The future developers within the site will be required to enter into future water and sewer service agreements. These agreements will further detail the extent and timing of the water and sewer mitigation and define how these improvements relate to other fees to be paid to VWD. By implementing these mitigation measures, impacts to wastewater would be reduced to below a level of significance for the UDSP.

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still generate wastewater flows that would need to use the existing conveyance system, treatment facilities and Land Outfall. However, development under the proposed Specific Plan Amendment would be decreased. Therefore, there will be less demand for wastewater facilities. Thus the FEIR was more conservative in its analysis. Development under the proposed Specific Plan Amendment will still have to adhere to the mitigation measures identified in the FEIR. No new impact is identified for this issue area.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

**f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.14-19) identified that the Sycamore Sanitary Landfill would have sufficient capacity for the UDSP project assuming a 50 percent diversion rate and with the implementation of a construction waste management program to divert materials. The FEIR analysis included waste generated due to the demolition of structures on the project site.

**Discussion of the Specific Plan Amendment:** The adopted Specific Plan would slightly increase the amount of General Office by 14,000 s.f. and reduce the amount of Commercial by

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300,000 s.f. This results in a total reduction of solid waste generation. As shown in **Table 13**, under the adopted Specific Plan, the project is forecast to generate 15,114 tons/year. Under the proposed Specific Plan Amendment, the project is forecast to generate 11,907 tons/year. This represents a reduction of 3,207 tons/year (21.2 percent). Therefore, the proposed Specific Plan Amendment decreases the amount of waste generation and the conclusions in the adopted FEIR would still be applicable to the proposed Specific Plan Amendment.

**Table 13. Solid Waste Generation Comparison (Adopted Specific Plan vs. Specific Plan Amendment)**

| Land Use                                | Generation Rate            | Units/s.f. proposed | Total Volume (tons/year) |
|-----------------------------------------|----------------------------|---------------------|--------------------------|
| <b>Adopted Specific Plan</b>            |                            |                     |                          |
| Residential                             | 0.44 ton/year/DU           | 2,600               | 1,144                    |
| Office General & Medical                | 0.0024 tons/s.f./year      | 938,000 s.f.        | 2,251                    |
| Commercial (Retail)                     | 0.0108 tons/s.f./year      | 1,000,000 s.f.      | 10,800                   |
| Hotel                                   | 2 lbs/room/day             | 450                 | 164                      |
| Student Housing                         | 5.31 lbs/dwelling unit/day | 800                 | 755                      |
|                                         |                            |                     | <b>15,114 tons/year</b>  |
| <b>Proposed Specific Plan Amendment</b> |                            |                     |                          |
| Residential                             | 0.44 ton/year/DU           | 2,600               | 1,144                    |
| Office General & Medical                | 0.0024 tons/s.f./year      | 952,000 s.f.        | 2,284                    |
| Commercial (Retail)                     | 0.0108 tons/s.f./year      | 700,000 s.f.        | 7,560                    |
| Hotel                                   | 2 lbs/room/day             | 450                 | 164                      |
| Student Housing                         | 5.31 lbs/dwelling unit/day | 800                 | 755                      |
| <b>Total</b>                            |                            |                     | <b>11,907 tons/year</b>  |

**Finding:** Implementation of the Specific Plan Amendment results in a reduction of solid waste generation. There are no changes or new information associated with this project that would require the preparation of an EIR.

**g) Comply with Federal, State, and local statutes and regulations related to solid waste?**

**FEIR Conclusion: No Impact.** The FEIR (page 3.14-3) addresses AB 939 - Integrated Waste Management Act which identifies the diversion rate of 50 percent of solid waste through reduction, recycling, and composting activities and the mandate that all California cities and counties achieve a 75 percent diversion rate by the year 2010. According to the FEIR, the City is currently at a 50 percent reduction and is compliant with AB 939.

**Discussion of the Specific Plan Amendment:** The proposed Specific Plan Amendment reduces the amount of development which reduces the amount of solid waste generated by the project. Specifically, the proposed Specific Plan Amendment results in a reduction of 3,207 tons/year (21.2 percent). Therefore, the proposed Specific Plan Amendment decreases the amount of waste generation and the conclusions in the adopted FEIR would still be applicable to the proposed Specific Plan Amendment.

**Finding:** Implementation of the Specific Plan Amendment results in a reduction of solid waste generation. There are no changes or new information associated with this project that would require the preparation of an EIR.

### 18. Mandatory Findings of Significance

- a) Does the 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?*

**FEIR Conclusion:** The Final EIR for the UDSP concluded that all biological resource impacts would be mitigated to below a level of significance (FEIR Section 3.3). Additionally the FEIR concluded that that impact to cultural resources would be mitigated to below a level of significance (FEIR Section 3.4).

**Discussion of the Specific Plan Amendment:** Development under the proposed Specific Plan Amendment would still occur within the same footprint. Biological resources and cultural resources mitigation identified in the FEIR will still be applicable to future development under the proposed Specific Plan Amendment. The proposed Specific Plan Amendment does not result in any increase in impacts to biological resources or cultural resources compared to what was analyzed in the FEIR.

**Finding:** Therefore, there are no changes or new information associated with this project that would require the preparation of an EIR.

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

**FEIR Conclusion:** The FEIR prepared for the UDSP concluded that the project would have significant and unmitigated cumulative impacts related to air quality (CO, NO<sub>x</sub>, and ROG), greenhouse gas emissions, and traffic in the 2030 time frame (SR 78 ramps/segments and the intersection of San Marcos Boulevard/Rancho Santa Fe Road). All other issue areas were determined to have cumulative impacts that were less than significant.

**Discussion of the Specific Plan Amendment:** Implementation of the proposed Specific Plan Amendment would reduce the amount of air emissions, as the overall development intensity would be reduced. Thus, the project's cumulative contribution to air quality and greenhouse gas emissions would decrease.

The reduction in development intensity also results in a reduction in trip generation. Thus the project will contribute fewer trips to the impacted road segments and intersections. Traffic-related mitigation measures identified in the FEIR will still be applicable to future development under the Specific Plan Amendment. The traffic study (Appendix C) prepared for this proposed Specific Plan Amendment assigned peak hour trip thresholds for each of the proposed mitigation measures (see Tables 11 and 12).

The proposed Specific Plan Amendment would not increase the cumulative air, greenhouse gas or traffic impacts beyond what was analyzed in the FEIR. No other cumulative contributions beyond what was identified in the FEIR for the other environmental issue areas would occur

### 3.0 INITIAL STUDY

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under the proposed Specific Plan Amendment. Therefore, the FEIR adequately disclosed the potential cumulative impacts of the proposed Specific Plan Amendment.

**Finding:** Therefore, there are no changes or new information associated with this project that would require the preparation of an EIR.

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

**FEIR Conclusion:** The FEIR prepared for the UDSP did not identify any project impacts that would have environmental effects on human beings either directly or indirectly with the exception of unmitigated project- and cumulative-level air quality and greenhouse gas impacts, as discussed in 18(b), above.

**Discussion of the Specific Plan Amendment:** Implementation of the proposed Specific Plan Amendment would reduce the amount of air emissions from the project, as development intensity would be reduced. However, this is not expected to be enough to reduce the significant and unmitigated cumulative impact identified in the FEIR. The proposed Specific Plan Amendment would not increase the cumulative impact beyond what was analyzed in the FEIR. No other cumulative contributions beyond what was identified in the FEIR for the other environmental issue areas would occur under the proposed Specific Plan Amendment. Therefore, the FEIR adequately disclosed the potential cumulative impacts of the proposed Specific Plan Amendment.

**Finding:** Therefore, there are no changes or new information associated with this project that would require the preparation of an EIR.

## 19. Earlier Analyses

Earlier analyses may be used where, pursuant to tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or Negative Declaration (Section 15063(c)(3)(D)). These documents are on file with the City of San Marcos Planning Division and are included as Appendices B and C of this document.

- *University District Specific Plan Final Environmental Impact Report*. 2009. (SCH No. 2008101083)
- *University District Rock Crusher Conditional Use Permit*. 2011. (SCH No. 2011081083)

## 20. References

RBF Consulting. 2014. University District Specific Plan Amendment Traffic Impact Assessment Report. April 17.

RBF Consulting. 2009. Traffic Impact Analysis Report for University District. June.

Urban Systems Associates. 2013. University District Specific Plan On-Site Traffic Study. November 27.

### 21. Preparers

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**TECHNICAL APPENDICES**  
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