



Escondido Creek Trail Expansion and Renovation Project

Final Initial Study – Mitigated Negative Declaration

prepared by

City of Escondido
Planning Division
201 North Broadway
Escondido, California 92025
Contact: Joanna Axelrod, Deputy City Manager/Director
Communications & Community Services

prepared with the assistance of

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2215 Faraday Avenue, Suite A
Carlsbad, California 92008

Approved by Zoning Administrator 1/30/24

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November 2022



RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

rinconconsultants.com

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Initial Study

1. Project Title

Escondido Creek Trail Expansion and Renovation Project

2. Lead Agency Name and Address

City of Escondido
201 North Broadway
Escondido, California 92025

3. Contact Person and Phone Number

Joanna Axelrod
Deputy City Manager/Director Communications & Community Services
760-839-4871

4. Project Location

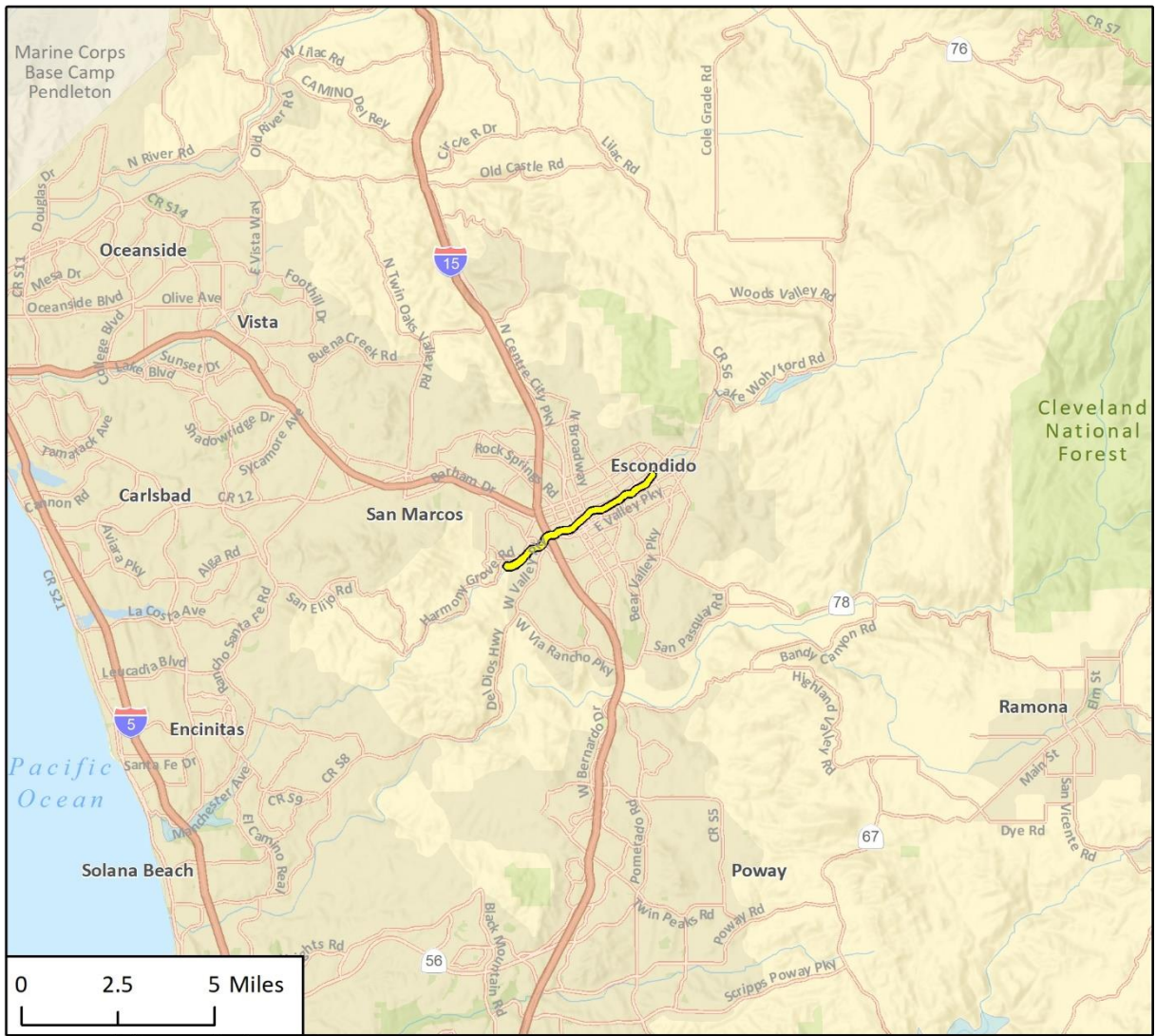
Regional Setting

The city of Escondido is in San Diego County's North County region. It is situated in a valley bisected by Escondido Creek and surrounded by hills and mountains (Escondido 2012a). Escondido Creek originates at Lake Wholford to the east, follows a 28-mile journey to the San Elijo Lagoon, and ultimately discharges into the Pacific Ocean (Escondido 2012b). A seven-mile segment of Escondido Creek flows to the southwest through the city of Escondido. Interstate 15 (I-15) traverses Escondido in a north-south direction, providing connections to San Diego and Riverside County (Escondido 2012a). Figure 1 shows the project's regional setting.

Local Setting

The project site is an approximately 4.5-mile corridor along the banks of Escondido Creek in the city of Escondido. The western terminus of the corridor is near Citracado Parkway, and the eastern endpoint is N. Midway Drive. In almost 4.2 miles of the corridor, between Harmony Grove Road and N. Midway Drive, Escondido Creek is channelized and lined with concrete. The creek channel slopes gently downward from an elevation of approximately 680 feet at N. Midway Drive to 610 feet near Citracado Parkway. From Centre City Parkway to N. Escondido Boulevard, the creek channel enters a tunnel beneath urban development. Figure 2 shows the project site's local setting in Escondido.

Figure 1 Regional Location



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 Project Location

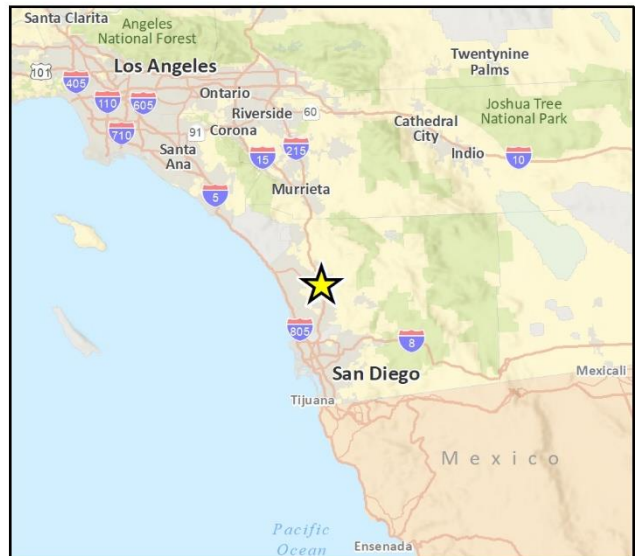


Fig 1 Regional Location

Figure 2 Project Location

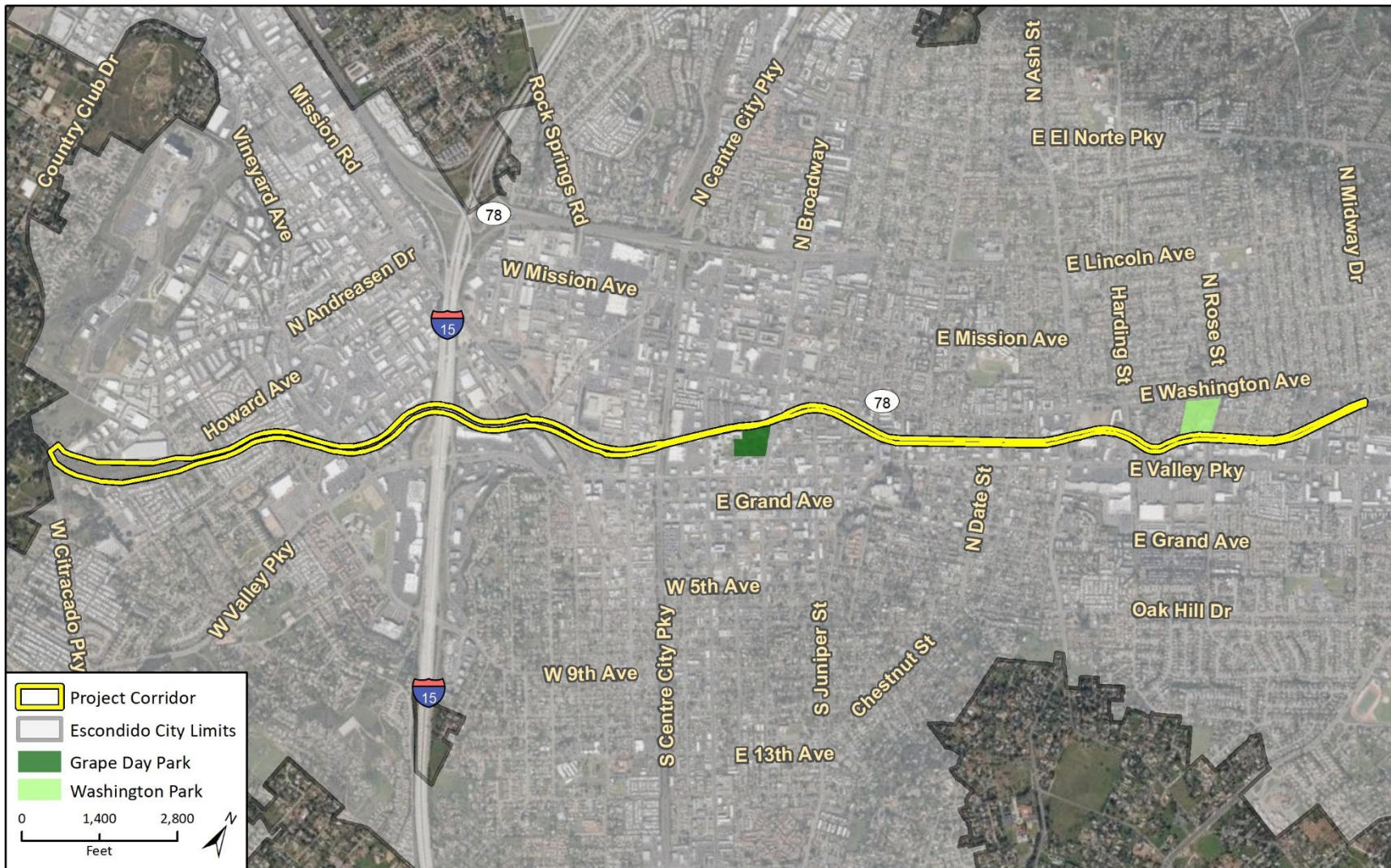


Fig 2 Project Corridor

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The existing multi-use Escondido Creek Trail is in the following segments of the project corridor:

- The south side of Escondido Creek from Harmony Grove Road to Centre City Parkway;
- The north side of Escondido Creek from N. Broadway to N. Fig Street;
- Both sides of Escondido Creek from N. Fig Street to N. Date Street (with a bridge connecting the parallel segments at N. Date Street); and
- The south side of Escondido Creek from N. Date Street to N. Midway Drive.

Between Centre City Parkway and N. Broadway, the Escondido Creek Trail diverts from the project corridor, avoiding the creek channel's tunnel. In this segment the trail becomes a separated bikeway along Centre City Parkway, W. Valley Parkway, and N. Broadway.

Many transportation routes cross the project corridor over its 4.5-mile length. Key crossings include the I-15 overpass; a railroad bridge to the east of N. Tulip Street; and multiple north-south arterial roadways such as Centre City Parkway, N. Broadway, and N. Ash Street. Near the Escondido Transit Center, the Inland-Rail Trail crosses Escondido Creek on a bridge and intersects with the Escondido Creek Trail. The Inland-Rail Trail is a multi-use path that parallels the Sprinter Light Rail line and connects Escondido with San Marcos (Escondido 2012c).

5. Project Sponsor's Name and Address

Same as Lead Agency

6. General Plan Designation

Flood

7. Zoning

Flood Control Channel (FCC)

8. Description of Project

The proposed project would expand and renovate the existing Escondido Creek Trail in an approximately 4.5-mile corridor in the city of Escondido. Currently, the trail's western terminus is at Harmony Grove Road. The project would extend the trail westward along the north side of the creek terminate in the vicinity of an extension of Citracado Parkway. From Harmony Grove Road eastward to N. Midway Drive, the project would involve landscaping and recreational improvements to the existing trail. Table 1 describes the proposed features by segment of the trail corridor.

Table 1 Proposed Features by Trail Segment

Trail Segment	Feature
Citracado Parkway to Harmony Grove Road	<ul style="list-style-type: none"> ▪ Expansion of trail on existing maintenance road by adding striping for bicycle lanes. ▪ New trail access point at Harmony Grove Road.
Harmony Grove Road to N. Quince Street	<ul style="list-style-type: none"> ▪ Decomposed granite surface on south side of the creek.
N. Quince Street to N. Broadway	<ul style="list-style-type: none"> ▪ No work (trail follows existing streets in this segment).
N. Broadway to N. Hickory Street	<ul style="list-style-type: none"> ▪ Landscaping and trail improvements (likely decomposed granite surface) on north side of creek.¹
N. Hickory Street to N. Fig Street	<ul style="list-style-type: none"> ▪ Landscaping improvements on north side of creek.
N. Elm Street to N. Midway Drive	<ul style="list-style-type: none"> ▪ Decomposed granite surface, landscaping improvements, and new trail access point at N. Beech Street on north side of creek. ▪ 4 new outdoor fitness stations with bike racks on north side of creek. ▪ Landscaping improvements on south side of creek. ▪ 75 lighting fixtures on north side of trail from N. Date Street to N. Midway Way. ▪ 65 light fixtures on south side of trail from N. Ash Street to N. Midway Drive. ▪ Bike racks near N. Date Street and Washington Park.

¹ All landscaping in the trail corridor would be irrigated with recycled water. The irrigation system would connect to the City's existing recycled water lines that run along the trail corridor.
Source: Escondido 2021a

In addition to the trail features listed in Table 1, the project would add new fencing, potable water features, and trees. Between the trail and the creek, an existing six-foot chain link fence would be replaced with a 4.5-foot cable fence. Vines would be planted along some segments of the new creekside fence. Next to adjacent streets, an existing six-foot chain link would be replaced with a black wrought-iron or other black metal material fence from four to six feet high. Some six-foot privacy fences at the boundary of adjacent properties also would be replaced with a six-foot chain link fence and vines in some reaches and a six-foot wrought-iron fence in other areas. In landscaped areas, the City would plant more than 150 trees. Four existing Mexican fan palm trees would be removed. Four water bottle filling stations also would be installed along the trail.

The project would implement trail improvements envisioned in the City's Escondido Creek Trail Master Plan Report (Escondido 2012b). This plan is intended to connect residents to work, home, recreation, schools, and shopping via the Escondido Creek Trail, reducing the need to travel by automobile. Specific populations served by the Escondido Creek Trail include residents of the traditionally under-served Mission Park area and much of Escondido's senior population. The Trail Master Plan focuses on a 4.5-mile study area along the creek, from the vicinity of the Escondido Transit Center to Daley Ranch. Although the portion of the proposed project to the west of Centre City Parkway is outside this study area, the Trail Master Plan sets forth a vision, goals, themes, and amenities that can be applied to any segment of the trail, including those outside the study area.

Proposed trail features would be consistent with design guidelines in the Trail Master Plan. In several segments of the trail, for example, a strip of asphalt would be removed on either side of the trail and replaced with a stabilized surface of decomposed granite, which is preferred by joggers (Escondido 2012b). The project also would implement design guidelines for meandering decomposed granite paths alongside the paved trail and landscaping with native plants. In addition, consistent with design guidelines for pedestrian safety, the project would add lighting to the trail

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segment from N. Date Street to N. Midway Drive. The Trail Master Plan states that lighting should be energy-efficient, durable, and have directional hoods to prevent light spill onto adjacent properties. Proposed lighting, mounted on 25-foot poles, would consist of light-emitting diode (LED) fixtures shielded with a downward-facing, six-inch-deep cylinder to focus light on the trail surface.

Concurrently with this project, the City will be replacing existing chain link fencing with new wrought iron fencing along an approximately 1.3 mile portion of the Escondido Creek Trail, between Date Street and Midway Drive. These improvements would be undertaken completely separately from the proposed trail improvements under this project and would undergo separate environmental analysis under CEQA and the National Environmental Policy Act. Replacing fencing along this portion of the trail is a separate, independent project that would occur regardless of the implementation of the proposed project. This replacement of fencing is therefore considered a cumulative project.

9. Surrounding Land Uses and Setting

The 4.5-mile project corridor is surrounded by a wide variety of land uses, ranging from single-family residential to industrial (Escondido 2019). The western portion of the corridor, from Citracado Parkway to N. Broadway, is generally the most urban in terms of the types and density of land uses. This segment is surrounded by a mixture of industrial uses; commercial development including the Escondido Auto Park, shopping malls, stand-alone stores; a transit hub (the Escondido Transit Center); residential development (single-family, multi-family, and mobile home parks); institutional uses (e.g., the Conrad Prebys Escondido Branch of the Boys & Girls Club); and parkland (Grape Day Park). The Escondido Transit Center is the eastern terminus of the North County Transit District's SPRINTER light rail line, which crosses the project site near N. Tulip Street.

To the east of N. Broadway, surrounding land uses are predominantly residential and commercial. Residential uses in this area include several mobile home parks, single-family and multi-family residential neighborhoods. A strip of retail stores and restaurants along Valley Parkway is located on the south side of the corridor. Several institutional land uses also occur along this segment: Escondido Charter High School, Escondido Fire Station No. 2, and the Church of Jesus Christ of Latter-day Saints. Washington Park is on the north side of the project site by N. Rose Street.

10. Other Public Agencies Whose Approval Is Required

None.

11. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

On June 1, 2021, the City of Escondido distributed AB 52 consultation letters for the proposed project; including project information, map, and contact information to each of the five (5) Native American tribes previously requesting to consult on City of Escondido projects. The tribal governments that were provided an AB 52 consultation letter include the following:

- Mesa Grande Band of Mission Indians
- Rincon Band of Luiseño Indians
- San Luis Rey Band of Mission Indians
- San Pasqual Band of Mission Indians
- Soboba Band of Luiseño Indians

On June 11, 2021, San Pasqual Band of Mission Indians responded to the AB 52 consultation letter, requesting government-to-government consultation under Section 106 of the NHPA. In addition, San Pasqual Band of Mission Indians has requested access to any cultural resource reports generated under the environmental review processes. See Section 18, *Tribal Cultural Resources*, for additional discussion. The San Pasqual Band of Mission Indians consulted with the City through February 2022.

In addition to the San Pasqual Band of Mission Indians, the following tribes responded and City met with each tribe on the indicated dates:

- Rincon Band of Luiseño Indians on September 22, 2021
- San Luis Rey Band of Mission Indians on October 6, 2021

The Rincon Band of Luiseño Indians sent a letter to the City on November 1, 2021 agreeing with the measures proposed by Rincon Consultants, Inc. Cultural Resources Assessment (Appendix B) and requested to be notified of any changes to project plans.

The San Luis Rey Band of Mission Indians notified staff on February 14, 2022 that they have concluded consultation.

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Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

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

Determination

Based on this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “less than significant with mitigation incorporated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Signature

Date

Printed Name

Title

Environmental Checklist

1 Aesthetics

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

Visual Resources Policy 3.6 in the Resource Conservation Element of the City’s General Plan identifies I-15 as a scenic corridor (Escondido 2012a). This policy is intended to preserve prominent scenic views along the corridor, including “outstanding continuous, panoramic views of the valley floor, surrounding ridges and Lake Hodges, and focal views where the eye is channeled toward a visually dominant feature such as an undisturbed hillside or steep slopes with rock outcroppings.” Development proposals within 1,750 feet of the freeway are required to include a visual assessment and conform to community design policies which address:

- a. The siting of new structures outside of significant viewshed corridors;
- b. The protection of hillsides and ridgelines; and
- c. The need to blend developments with their setting in terms of height and scale.

A scenic highway is generally defined by the California Department of Transportation (Caltrans) as a public highway that traverses an area of outstanding scenic quality, containing striking views, flora, geology, or other unique natural attributes. Two highways, I-15 and State Route 78 pass through Escondido. Neither roadway is a State-designated scenic highway or eligible for such designation in the vicinity of Escondido (Caltrans 2019). I-15 is an eligible scenic highway to the north of Palo Mesa,

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which is 15 miles north of the project site. State Route 78 also is an eligible scenic highway to the east of Santa Ysabel, which is 22 miles east of the project site. Escondido is not visible from these highway segments.

The City's General Plan also identifies scenic resources in Escondido. Visual Resources Policy 3.1 states that the following elements are significant visual resources to be preserved: "unique landforms (e.g., skyline ridges, intermediate ridges, hilltops, and rock outcroppings), creeks, lakes, and open space areas in a natural state" (Escondido 2012a). In addition, Visual Resources Policy 3.3 identifies floodways as significant visual resources. Under Visual Resources Policy 3.2, new development is required to avoid obstructing views of such resources. Figure 3 shows existing views of scenic ridges from the trail corridor.

Visually prominent features in the trail corridor include the paved trail, the concrete-lined creek, chain-link fencing that separates the trail from adjacent uses, lighting fixtures where installed on the trail, and scattered trees (e.g., palm trees) near the property line. Figure 4 through Figure 7 show representative views in different sections of the 4.5-mile trail corridor. Figure 8 shows public views from neighboring parks (including Grape Day Park and Washington Park) toward the project corridor.

a. Would the project have a substantial adverse effect on a scenic vista?

The City's General Plan identifies I-15 as a scenic corridor (Escondido 2012a). The freeway offers scenic vistas of hillsides and ridgelines around Escondido. The project corridor crosses I-15 to the west of central Escondido. An approximately 0.7-mile segment of the project corridor is within 1,750 feet of either side of I-15, where Visual Resource Policy 3.6 in the General Plan requires that projects undergo a visual assessment and conform to policies for the protection of scenic vistas. This segment of the project corridor stretches from S. Auto Parkway to the railroad overcrossing east of N. Tulip Street.

As shown in Figure 5, I-15 passes over Escondido Creek by bridge. The creek is situated approximately 40 feet below the freeway's elevation. The bridge offers a narrow view of the project corridor, perpendicular to the direction of traffic flow. The most prominent features visible to motorists are the concrete-lined channel of Escondido Creek and trees lining the riparian corridor. This view is briefly available as motorists cross the bridge and otherwise obscured by intervening trees and buildings. Panoramic views of the valley floor are not visible through the project corridor because of obstructing features. Scenic resources cited in Visual Resources Policy 3.6, such as hillsides and ridgelines, also are not part of the view. However, the channelized floodway of Escondido Creek visible from I-15 could be considered a significant visual resource under Visual Resource Policy 3.3.

The project would not obstruct existing views of the project corridor from the freeway. In the scenic corridor within 1,750 feet of I-15, the project would add decomposed granite paths on the south side of the creek. With the freeway overpass elevated above the trail, this surface-level feature would not affect existing views available to motorists. The project would not include buildings or other structures that could obstruct significant viewshed corridors, views of scenic hillsides and ridgelines, or panoramic views of the valley floor from I-15. In addition, the proposed paths would be compatible with the height and scale of features in the project corridor. Escondido Creek Trail would continue to offer trail users scenic views of ridges, hilltops, and rock outcroppings. Therefore, the project would have a less than significant impact on scenic vistas.

LESS THAN SIGNIFICANT IMPACT

Figure 3 Photographs of Scenic Views from Trail Corridor



Photograph 1. Westward view of hilltop from western terminus of trail corridor near Citracado Parkway.



Photograph 2. Eastward view of skyline ridges, intermediate ridges, and hilltops from trail corridor at N. Midway Drive.

Figure 4 Photographs of Representative Views: Western Terminus to Near I-15



Photograph 3. Eastward view of trail corridor between Citracado Parkway and Harmony Grove Road.



Photograph 4. Eastward view of trail corridor and neighboring mobile home park east of Harmony Grove Road.

Figure 5 Photographs of Representative Views: I-15 to N. Quince Street



Photograph 5. Westward view of I-15 overpass from trail corridor.



Photograph 6. Eastward view of trail corridor to the east of I-15 overpass.

Figure 6 Photographs of Representative Views: N. Broadway to N. Fig Street



Photograph 7. Eastward view of trail corridor and lighting fixtures, to east of N. Broadway.



Photograph 8. Eastward view of trail corridor between N. Hickory Street and N. Fig Street.

Figure 7 Photographs of Representative Views: N. Fig Street to N. Midway Drive



Photograph 9. Northeast-ward view of trail corridor to the east of N. Fig Street.



Photograph 10. Eastward view of trail corridor near N. Midway Drive.

Figure 8 Photographs of Park Views Toward Project Corridor



Photograph 11. Northward view from Grape Day Park toward trail corridor and N. Broadway overpass.



Photograph 12. Southwest-ward view of trail corridor from parking lot at Washington Park.

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

As discussed above, the project corridor is not visible from the nearest officially State-designated or eligible scenic highways, which are located at least 15 miles away. Therefore, the project would not affect scenic resources within a State scenic highway. No impact would occur.

NO IMPACT

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

The project corridor is a flood control channel located in an urbanized area. It is primarily surrounded by residential, commercial, and industrial development in the city of Escondido. Applicable policies governing scenic quality in the City's General Plan are intended to protect existing views of scenic resources, such as hillsides, ridgelines, hilltops, rock outcroppings, creeks, lakes, natural open spaces areas, and floodways. As discussed in item 1a, the project would not conflict with policies to protect scenic views from I-15. The project also would not introduce features that detract from scenic qualities of the Escondido Creek floodway. Although the project would involve removal of four Mexican fan palm trees, more than 150 trees would be planted along the 4.5-mile project corridor. Several new native plant gardens and a pollinator garden would substantially increase the amount and quality of landscaping along the floodway. In addition, the proposed replacement of some existing chain-link fencing with wrought-iron fencing and trailing vines would improve the appearance of the floodway.

While the existing trail is channelized and covered with concrete panels, the proposed trail extension to the west of Harmony Grove Road would open to public views a more natural segment of Escondido Creek without concrete panels. Furthermore, the project would not introduce buildings or structures that could block scenic views of hillsides, ridgelines, and hilltops. Existing scenic views of these resources from the trail would continue to be available to trail users. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

As shown in Figure 6 and Figure 7, portions of the existing trail from N. Broadway to N. Midway Drive are lined by pole-mounted lighting fixtures. Downward-facing shields on existing lighting fixtures focus light on the trail while minimizing spillover of light onto neighboring properties. The project would introduce additional lighting fixtures to improve visibility and enhance safety for trail users. New pedestrian-scale lighting, mounted on 25-foot poles, would be installed on the following trail segments:

- 75 lighting fixtures on the north side of the trail from N. Date Street to N. Midway Way; and
- 65 light fixtures on the south side of the trail from N. Ash Street to N. Midway Drive.

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Although proposed light fixtures would increase nighttime lighting near Escondido Creek, they would be built consistent with design guidelines in the Trail Master Plan, with shielding to prevent light spillover onto adjacent properties. The Trail Master Plan states that lighting should be energy-efficient, durable, and have directional hoods to prevent light spill onto adjacent properties. Each new lighting fixture would be shielded with a downward-facing, six-inch-deep cylinder.

Proposed lighting also would be consistent with the outdoor lighting standards in Chapter 33, Article 35 of the Escondido Municipal Code. These standards require that new outdoor lighting in non-residential development consist of shielded low-pressure sodium, narrow-spectrum amber LEDs, or other energy efficient outdoor light fixtures (Escondido 2020). Other lighting types are allowed for recreational uses if timed to shut off when recreational activity ceases at night. Based on these standards, the City would only install narrow-spectrum amber LEDs or else would turn off lighting nightly when trail use is no longer occurring.

Because the project would use shielded, pedestrian-scale lighting that complies with design guidelines in the Trail Master Plan and standards in the Escondido Municipal Code, it would not substantially increase nighttime lighting levels or glare to the extent that would affect views.

LESS THAN SIGNIFICANT IMPACT

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

-
- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
 - b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*
 - c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*
 - d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

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- e. *Would the project 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?*

The project corridor is located in an urbanized part of Escondido, which the California Department of Conservation does not identify as suitable for farmland (California Department of Conservation 2019). The Department of Conservation has mapped the entire corridor as Urban and Built-Up Land, except that the portion of the corridor west of Harmony Grove Road is labeled as Other Land. Therefore, the project would not facilitate conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The project corridor also is not zoned for agricultural use, forest land, or timberland, and does not include such land uses (Escondido 2019). It is not under Williamson Act contracts for the preservation of farmland. Therefore, the project would have no impact on agricultural or forest land.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan (or applicable air quality thresholds specified in City of Escondido Zoning Code Article 47)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Located in the San Diego Air Basin (SDAB) and bordered by the South Coast Air Basin to the north, the Salton Sea Air Basin to the east, the United States/Mexico border to the south, and the Pacific Ocean to the west, the project site lies approximately 9 miles inland from the coast in an interior valley. Air pollutant emission sources in the SDAB are typically grouped into two categories: stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point source emissions originate from manufacturing and industrial processes, whereas area emissions originate from residential heaters, small engines, and other consumer products. Mobile source emissions can be attributed to vehicles and transportation-related activities. Both major emissions categories are widely distributed within SDAB and may have a cumulative effect.

Air Quality Standards and Attainment

Enacted in 1970, the federal Clean Air Act (CAA) was amended in 1977 and 1990 [42 United States Code (USC) 7401] for the purposes of protecting and enhancing the quality of the nation’s air resources to benefit public health, welfare, and productivity. In 1971, to achieve the purposes of Section 109 of the CAA [42 USC 7409], the U.S. Environmental Protection Agency (USEPA) developed primary and secondary national ambient air quality standards (NAAQS) for ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter with a diameter of up to ten microns (PM₁₀) and up to 2.5 microns (PM_{2.5}), and lead (Pb). Ambient Air Quality Standards

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represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare.

The California Clean Air Act (CCAA) was enacted in 1988 (California Health & Safety Code (H&SC) §39000 et seq.). While USEPA is the federal agency designated to administer air quality regulation, the California Air Resources Board (CARB) is the State equivalent in the California EPA (CalEPA). Under the CCAA, the State has developed the California Ambient Air Quality Standards (CAAQS), which are generally more stringent than the NAAQS. Like the federal CAA, the CCAA classifies specific geographic areas as either “attainment” or “nonattainment” areas for each pollutant, based on the comparison of measured data within the CAAQS.

Located within the SDAB, the project site is designated a nonattainment area for the federal and State eight-hour ozone standards, State one-hour ozone standards, and for State PM₁₀ and PM_{2.5}. The SDAB is designated unclassifiable or in attainment for all other federal and State standards (San Diego Air Pollution Control District [SDAPCD] 2021).

The health effects associated with criteria pollutants for which the SDAB is in non-attainment are described in Table 2.

Table 2 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; and, Long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans.
Suspended particulate matter (PM ₁₀)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma. ^a
Suspended particulate matter (PM _{2.5})	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma. ^a

^a More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: USEPA, Air Quality Criteria for Particulate Matter, October 2004. Source: USEPA 2021, <https://www.epa.gov/criteria-air-pollutants>

Air Quality Management

The SDAPCD is the designated air quality control agency for the SDAB. The SDAPCD developed the San Diego Regional Air Quality Strategy (RAQS) pursuant to CCAA requirements. The RAQS was initially adopted in 1991 and updated in 1995, 1998, 2001, 2004, 2009, and 2016. The RAQS identifies feasible emission control measures to provide progress in San Diego County toward attaining the State ozone standard. The pollutants addressed in the RAQS are volatile organic compounds (VOCs) and NO_x, precursors to the photochemical formation of ozone (the primary

component of smog). The RAQS was initially adopted by the SDAPCD Board on June 30, 1992, and amended on March 2, 1993, in response to CARB comments. At present, no attainment plan for PM₁₀ or PM_{2.5} is required by the state regulations. However, SDAPCD has adopted measures to reduce PM₁₀ and PM_{2.5} in San Diego County. These measures range from regulation against open burning to incentive programs that introduce cleaner technology. These measures can be found in a report titled “Measures to Reduce Particulate Matter in San Diego County” (2005) found on the SDAPCD website (<http://www.sdapcd.org>).

The RAQS relies on information from CARB and San Diego Association of Governments (SANDAG), including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls.

Air Quality Criteria Pollutant Significance Thresholds

The SDAPCD has adopted numerical air quality impact analysis trigger levels to determine whether an air pollution source could contribute individually or cumulatively to the worsening local or regional air quality. These trigger levels are also used by planning agencies and local jurisdictions as screening level thresholds for comparative purposes when evaluating projects under the California Environmental Quality Act (CEQA). Thus, a project that does not exceed these SDAPCD screening level thresholds would have a less than significant impact for air quality significance criterion b. The screening level thresholds for temporary construction and long-term operational emissions in the SDAB are shown in Table 3.

Table 3 SDAPCD Screening Level Thresholds

Pollutant	Total Emissions (lbs/day)
ROG/VOCs	250
NO _x	250
CO	550
SO _x	250
PM ₁₀	100
PM _{2.5}	67

Source: SDAPCD Rule 20.2.

The SDAPCD does not have a specified threshold for health risk impacts from toxic air contaminants (TACs). Rule 1200 for the SDAPCD relates to review of new sources for TACs. The rule states that new sources with a maximum incremental cancer risk greater than 10 in one million shall conduct the following to obtain an Authority to Construct or Permit to Operate: implementation of Toxics Best Available Control Technology (T-BACT) and a report in support of approving an Authority to Construct the project, which includes methods to reduce cancer risk. As the maximum incremental cancer risk greater than 10 in one million is used by SDAPCD to determine projects that must meet a high standard for Authority to Construct, that limit is used for the determination of impacts in this analysis.

The City of Escondido Zoning Code Article 47 also contains air quality thresholds. These are similar to the SDAPCD thresholds stated above, with stricter VOC limits of 75 pounds per day for construction and 55 pounds per day for operation, and a PM_{2.5} limit of 55 pounds per day.

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- a. *Would the project conflict with or obstruct implementation of the applicable air quality plan (or applicable air quality thresholds specified in City of Escondido Zoning Code Article 47)?*

The applicable air quality management plan (AQMP) for Escondido is the RAQS for San Diego County, last updated in December 2016 (SDAPCD 2016). This plan outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone. To be consistent with an AQMP, a project must conform to the local General Plan and must not result in or contribute to an exceedance of the local jurisdiction's forecasted future population. Population growth would lead to increased vehicle use, energy consumption, and associated air pollutant emissions.

As discussed in Section 14, *Population and Housing*, the project would not involve the construction of infrastructure that could induce substantial population growth such as new or increased capacity sewer or water lines, or the construction of new streets and roads for motorized vehicles. While the proposed trail expansion and renovation would make non-motorized transportation more efficient, this would not be a substantial growth-inducing effect in Escondido. Furthermore, improvements to the Escondido Creek Trail would be consistent with transportation control measures in the RAQS to reduce ozone pollution. Bicycle facilities are one of six transportation control measures in the plan, which collectively have reduced motor vehicle travel and emissions (SDAPCD 2016). The Escondido Creek Trail provides convenient access to many destinations in the heart of the city and would continue to allow people to walk, bicycle, or use other non-motorized forms of transportation instead of motor vehicles. Therefore, the project would not result in or contribute to an exceedance of Escondido's forecasted population and would be consistent with the SDAPCD's RAQS.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project 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?*

Emissions for construction of the intersection improvements were estimated in Road Construction Emissions Model (RCEM) Version 9.0.0 from the Sacramento Metropolitan Air Quality Management District. The RCEM model was used for the trail improvements because it was designed specifically for linear construction projects. The modeling outputs are included in Appendix A of this document. For scheduling in the model, construction was assumed to begin in summer 2022 and until spring 2023 (approximately nine months). Construction equipment was identified as likely being graders, dump trucks, loaders, cranes, and backhoes. It was conservatively assumed that one of each equipment would operate per day, and that there would be two workers per equipment.

Project construction would primarily generate temporary criteria pollutant from construction equipment operation on-site and construction worker vehicle trips to and from the site. Table 4 summarizes maximum daily and annual emissions of pollutants throughout the construction period of the project. As shown in the table, emissions would not exceed SDAPCD screening level thresholds or City of Escondido thresholds during project construction. Therefore, project construction would not result in a cumulatively considerable net increase of a criteria pollutant, and impacts would be less than significant.

Table 4 Construction Criteria Pollutant Emissions

Construction Year	Maximum Daily Emissions (lbs/day)					
	ROC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction	2	17	13	<1	6	2
SDAPCD Thresholds	250	250	550	250	100	67
City of Escondido Thresholds	75	250	550	250	100	55
Threshold Exceeded?	No	No	No	No	No	No

See Appendix A for modeling results. Some numbers may not add up due to independent rounding.

Operation

The proposed project would emphasize non-vehicular modes of transportation. One of the regional benefits of increased trips from bicyclists and pedestrians is a potential reduction in vehicle miles traveled, and therefore a reduction in vehicular air pollutant emissions that could contribute to an existing or project air quality violation. Thus, impacts from a substantial contribution to an existing or project air quality violation from operation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Construction

Construction-related activities would result in short-term, project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts (CARB 2020a). At this time, SDAPCD has not adopted a methodology for analyzing such impacts.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 6 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends in a household). OEHHA recommends this risk be bracketed with 9-year and 70-year exposure periods. Health risk assessments (HRAs) should be limited to the period/duration of activities associated with the project.

The maximum PM_{2.5} emissions, which is used to represent DPM emissions for this analysis, would occur during grading activities. While grading emissions represent the worst-case condition, such activities would only occur for a few months, a fraction of the typical health risk calculation periods

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of 9 years, 30 years, and 70 years. In addition, as the project is linear, construction would only occur near a single sensitive receptor for a short period of time. Therefore, DPM generated by project construction is not expected to create conditions where the project would expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

Operation

The project would renovate an existing multi-use trail which is located near roadways. Proximity to travel lanes for motor vehicles would temporarily expose users of the Escondido Creek Trail to particulate matter, carbon monoxide, and other pollutants from motor vehicle exhaust. However, users would only be exposed to air pollutants for brief periods while using the trail and are not considered sensitive receptors. In addition, according to a 2017 review of scientific literature published in the Lancet Public Health journal, “consensus exists that despite the harmful effects of air pollution exposure, physical activity from active commuting provides more gains in health outcomes than air pollution exposure provides losses” (Cepeda et. al 2017). Therefore, it is expected that the health benefits from increased bicycling and pedestrian activity available through the project would outweigh the risks from exposure to air pollution.

The project would not introduce sources of operational pollutants that would expose adjacent sensitive receptors such as homes, hospitals, and schools to substantial pollutant concentrations. Furthermore, because the project is intended to facilitate non-motorized transportation, it is expected to reduce vehicle miles traveled in Escondido, thereby incrementally reducing the exposure of sensitive receptors to pollutant concentrations from motor vehicles. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

During construction of the project, emissions from construction equipment could potentially result in minor odors. However, construction activities would be temporary and would not involve materials or activities that are a potential source of significant odors. They would not result in the creation of objectionable odors affecting a substantial number of people. Furthermore, bicyclists, pedestrians, and other trail users would not be exposed to any objectionable odors from construction because the affected segment of the Escondido Creek Trail would be closed to the public when under construction. Therefore, the impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Vegetation communities in Escondido broadly include grassland, freshwater marsh, oak woodlands, riparian communities, chaparral, coastal scrub, and nonnative habitats (e.g., agriculture and ruderal/disturbed) as described in the city's General Plan (May 2012). The southern portion of the city (south of the project site) is largely developed urban landcover with agriculture and remnant coastal scrub and chaparral, while the northern portion (north of the project site) is primarily native habitat with agriculture. Areas of notable biological sensitivity within the city include Daley Ranch, Lake Wohlford, and San Dieguito River Park. These natural areas have potential to support several threatened and endangered plant and animal species.

Development has altered much of Escondido's landscape, restricting natural vegetation primarily to undeveloped hillside areas. Many species are locally rare or no longer occur in portions of Escondido as a result of agricultural and urban development within the city limits. Most of Escondido's population lives in developed areas in the center-southern portion of the city's limits.

Rincon conducted a reconnaissance-level biological survey of the project site on February 11, 2021. The survey occurred from 9:00 a.m. to 2:00 p.m. with temperatures ranging from 67 degrees Fahrenheit (°F) to 72°F, low winds (0-2 miles per hour), and partly cloudy (20%) skies. The purpose of the survey was to document existing biological conditions within the survey area, including plant and wildlife species, vegetation communities, and the potential for presence of sensitive species. The analysis provided below is derived from the reconnaissance survey, as well as a literature and database review of sensitive biological resources that have been recorded in the region, including other resources that are further described in the analysis below.

- a. *Would the project 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?*

Special-status species are those plants and animals that are: 1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the United States Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) under the Federal Endangered Species Act (FESA); 2) those listed or proposed for listing as Rare, Threatened, or Endangered by the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act (CESA); 3) those recognized as Species of Special Concern (SSC) or Fully Protected by CDFW; and 4) plants occurring on lists 1 and 2 of the CDFW California Rare Plant Rank (CRPR) system per the following definitions:

- List 1A = Plants presumed extinct or extirpated in California
- List 1B.1 = Rare or endangered in California and elsewhere; seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- List 1B.2 = Rare or endangered in California and elsewhere; fairly endangered in California (20-80% occurrences threatened)
- List 1B.3 = Rare or endangered in California and elsewhere; not very endangered in California (<20% of occurrences threatened or no current threats known)
- List 2B.1 = Rare, threatened or endangered in California, but more common elsewhere; seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)

- List 2B.2 = Rare, threatened or endangered in California, but more common elsewhere; moderately endangered in California (20-80% of occurrences threatened/high degree and immediacy of threat)
- List 2B.3 = Rare, threatened or endangered in California, but more common elsewhere; not very endangered in California (<20% of occurrences threatened or no current threats known)

In addition, special-status wildlife and plant species are ranked globally (G) and subnationally (S) 1 through 5 based on NatureServe's (2010) methodologies:

- G1 or S1 - Critically Imperiled Globally or Subnationally (state)
- G2 or S2 - Imperiled Globally or Subnationally (state)
- G3 or S3 - Vulnerable to extirpation or extinction Globally or Subnationally (state)
- G4 or S4 - Apparently secure Globally or Subnationally (state)
- G5 or S5 - Secure Globally or Subnationally (state)
- ? - Inexact Numeric Rank
- T - Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)
- Q – Questionable taxonomy that may reduce conservation priority

Although not considered special status, most nesting birds are afforded protection under the federal Migratory Bird Treaty Act (MBTA) and/or California Fish and Game Code (CFG) 3505.

A review of records from the California Natural Diversity Database (CNDDDB) (queried in February 2021 for a five-mile radius of the project site) and California Native Plant Society's Electronic Inventory (CNPSEI) (queried for the *Escondido* and nine surrounding U.S. Geological Survey quadrangles) identified 28 special-status animal species and 96 special-status plant species with occurrence records within the project's vicinity (within five miles of the project site), including 26 federal and/or state listed species. Suitable habitat occurs within or adjacent to the project site for three special-status wildlife species (coastal whiptail, least Bell's vireo, and western yellow bat). The USFWS Critical Habitat Mapper (USFWS 2021) search also showed that critical habitat for listed species occurs in hillsides in the vicinity of Escondido; however, does not occur within or adjacent to the project site.

The project site consists primarily of existing disturbed areas that run along the Escondido Creek channel. The existing trail along the north side of Escondido Creek is comprised of pavement along much of its length, and a utility easement is at the downstream (southwestern) end of the project west of Harmony Grove Road. Vegetation is primarily ruderal or ornamental along most of the project site's length, with native habitat limited to the downstream terminus (Figure 9 through Figure 12). Native habitat at the downstream portion of the project consists of southern coast live oak riparian forest with adjacent upland areas comprised of open coast live oak woodland, non-native grassland, and disturbed habitat.

Figure 9 Vegetation Communities & Land Cover Types

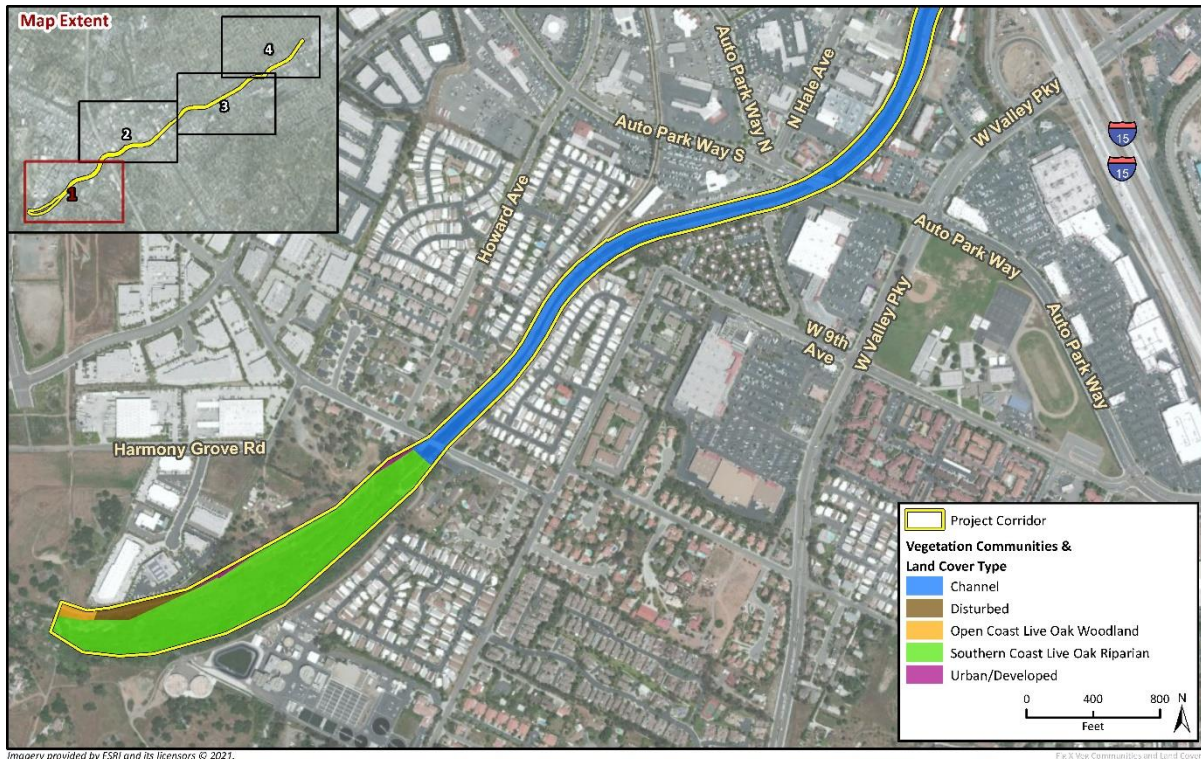


Figure 10 Vegetation Communities & Land Cover Types



Figure 11 Vegetation Communities & Land Cover Types

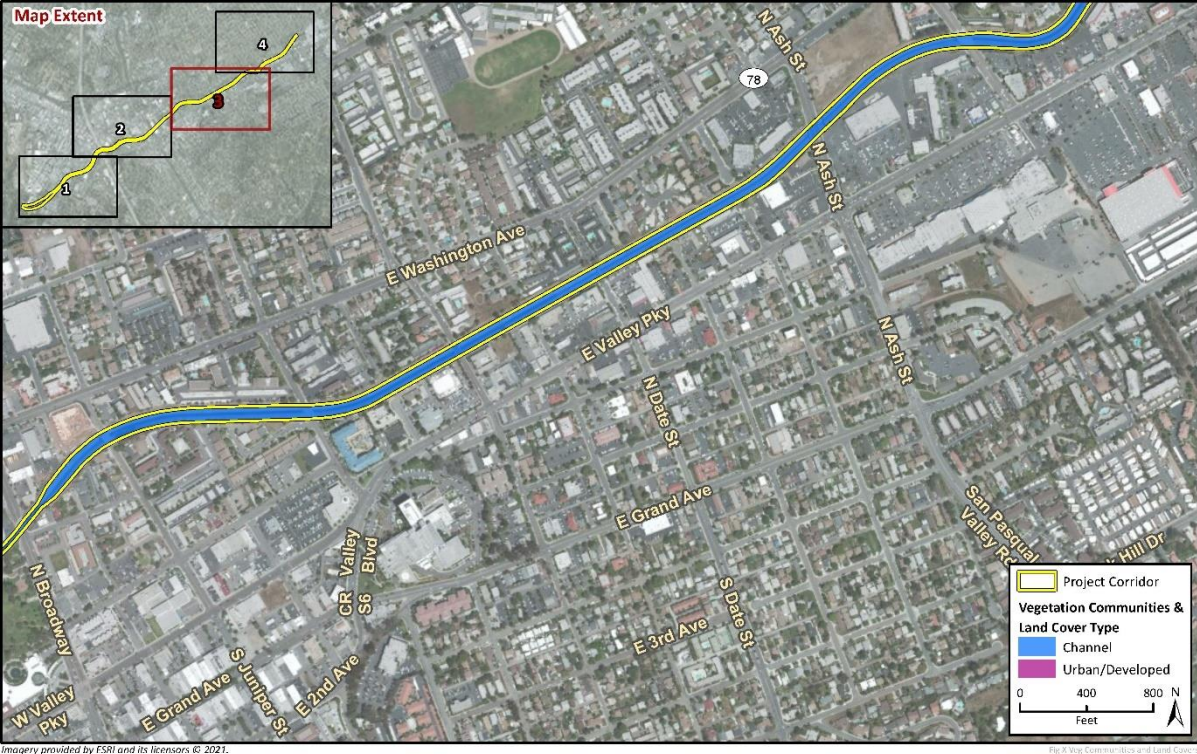


Figure 12 Vegetation Communities & Land Cover Types



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Plant species observed on-site during field reconnaissance included: coast live oak (*Quercus agrifolia*), California sycamore (*Platanus racemosa*), arroyo willow (*Salix lasiolepis*), lemonade berry (*Rhus integrifolia*), castor bean (*Ricinus communis*), cheatgrass (*Bromus* species), red willow (*Salix laevigata*), poison hemlock (*Conium maculatum*), wood fern (*Dryopteris* species), mulefat (*Baccharis salicifolia*), eucalyptus (*Eucalyptus globulus*), mugwort (*Artemisia douglasiana*), coyote willow (*Salix exigua*), Menzies' goldenbush (*Isocoma menziesii* var. *menziesii*), coyote bush (*Baccharis pilularis*), California buckwheat (*Eriogonum fasciculatum*), ~~Mexican fanqueen~~ palm (*Syagrus romanzoffiana*), ~~Washingtonia robusta~~, short-pod mustard (*Hirschfeldia incana*), black mustard (*Brassica nigra*), common stork's-bill (*Erodium cicutarium*), common horehound (*Marrubium vulgare*), toyon (*Heteromeles arbutifolia*), ripgut brome (*Bromus diandrus*), giant wildrye (*Elymus condensatus*), tree tobacco (*Nicotiana glauca*), blue elderberry (*Sambucus nigra* ssp. *caerulea*), pampas grass (*Cortaderia selloana*), purple fountain grass (*Pennisetum setaceum*), cheeseweed (*Malva parviflora*), wall barley (*Hordeum murinum*), Russian thistle (*Salsola tragus*), prickly lettuce (*Lactuca serriola*), wild oat (*Avena* species), and tree of heaven (*Ailanthus altissima*). No special-status plant species were observed on-site.

Wildlife species observed on-site during the field reconnaissance survey included: American crow (*Corvus brachyrhynchos*), lesser goldfinch (*Spinus psaltria*), European starling (*Sturnus vulgaris*), mallard (*Anas platyrhynchos*), Nuttall's woodpecker (*Dryobates nuttallii*), Anna's hummingbird (*Calypte anna*), black phoebe (*Sayornis nigricans*), great egret (*Ardea alba*), California scrub-jay (*Aphelocoma californica*), bushtit (*Psaltriparus minimus*), red-shouldered hawk (*Buteo lineatus*), acorn woodpecker (*Melanerpes formicivorus*), great blue heron (*Ardea herodias*), yellow-rumped warbler (*Setophaga coronata*), western kingbird (*Tyrannus verticalis*), mourning dove (*Zenaida macroura*), common raven (*Corvus corax*), house sparrow (*Passer domesticus*), red-tailed hawk (*Buteo jamaicensis*), California ground squirrel (*Otospermophilus beecheyi*), and Pacific tree frog (*Pseudacris regilla*). No special-status wildlife species were observed on-site.

The only habitat on-site that has potential for sensitive species to occur is within the native habitat (oak riparian & open oak woodlands) at the southwestern terminus of the trail west of Harmony Grove Road. This area is mapped by the USFWS National Wetlands Inventory (NWI) as having perennial water with temporary and semi-permanently flooded areas and freshwater forested/shrub wetland, freshwater emergent, and riverine habitat. These conditions were verified in the field.

Sensitive species with potential to occur in the oak riparian and open woodland habitat include:

- Coastal whiptail (*Aspidoscelis tigris stejnegeri*; State Species of Special Concern): Coastal whiptail lizards occupy a variety of habitats including chaparral, woodland, and riparian areas. Whiptail lizards live in burrows and do not migrate, resulting in many subspecies of western whiptail occurring throughout the west, one of which is the coastal whiptail.
- Least Bell's vireo (*Vireo bellii pusillus*; Federally Endangered, State Endangered): Least Bell's vireo was formerly a common and widespread summer resident of riparian scrub and forest habitats throughout California. They occupy thickets of willows and other low shrubs and trees where they build open-cup nests. They are usually found near water, but also inhabit thickets along dry, intermittent streams.
- Western yellow bat (*Lasiurus xanthinus*; State Species of Special Concern): Western yellow bats occur in riparian habitats where they roost under the fronds of palm trees. Their range may be increasing due to the increased use of palm trees as ornamental species. They forage for insects over water and among riparian trees.

Construction at the proposed trail extension west of Harmony Grove Road, near the oak riparian and open woodland habitat, would be limited to restriping on an existing paved maintenance road north of the creek. Ground disturbance would not occur in this area. Therefore, construction activity would not directly impact this sensitive habitat. ~~However, coastal whiptails that may have occupy burrows in the sensitive habitat area could also occur on the adjacent to the maintenance road. It is assumed, however, that any coastal whiptails would move away when equipment is approaching and the adjacent native vegetation will not be disturbed; therefore, restriping along the road is not expected to impact coastal whiptails since their burrows would be in the adjacent natural vegetation, if present. Restriping of the road could cause mortality or injury to coastal whiptails if present on the road surface.~~ All other proposed trail renovations would occur in developed/urban settings comprised of paved surfaces and ornamental or nonnative habitat that is typically not suitable to support special-status species. The removal of four ~~Mexican fan~~ queen palm trees could potentially cause a direct impact to yellow bats.

Indirect impacts from construction activities would include noise and vibrations generated from restriping activities proposed west of Harmony Grove Road. Of the three special-status species with potential to occur in the oak riparian habitat, western yellow bat (which would use palm trees rather than oak trees) has potential to experience adverse impacts if determined to be present within any palm trees that would be removed. Coastal whiptails occupy burrows which would shield them from indirect impacts from project activities. Because substantial ground-disturbing activities such as excavation and trenching would not occur, potential impacts to coastal whiptails would be negligible. Even though there is some level of potential for least Bell's vireo to occur in the oak riparian habitat due to the presence of willows in Escondido Creek west of Harmony Grove Road, least Bell's vireo would not experience adverse indirect impacts related to restriping activities, because noise generated from restriping activities is not expected to reach a decibel level high enough to disturb nesting vireos given the generally substantial distance of the willows from the project site.

Construction activities that occur during the avian nesting season, typically February through August, also have the potential to directly impact nesting birds if nests are destroyed. They can also disrupt breeding activity, causing abandonment of nests or premature fledging of the young. The project site has trees and shrubs that are suitable habitat for a variety of nesting birds protected under the federal MBTA and state CFGC Section 3505. Therefore, impacts to nesting birds would be potentially significant unless mitigation is incorporated. As discussed above, the project also would remove palm trees that western yellow bats could use for roosting ~~and result in mortality or injury to coastal whiptails~~, resulting in significant impacts to ~~these~~ this special-status species unless mitigation is incorporated.

Mitigation Measures

~~BIO-1 Pre-Construction Biological Survey and Avoidance of Special-Status Species Worker Environmental Awareness Program Training~~

The City shall retain a qualified biologist to provide a Worker Environmental Awareness Program (WEAP) training for the construction crew. Each employee (including temporary, contractors, and subcontractors) will receive the WEAP on the first day of working on the proposed project. They will be advised of the potential impact to special-status species and the potential penalties for taking such species. At a minimum, the WEAP will include the following topics: potential occurrence of the special-status species in the area, their general ecology, sensitivity of the species to human activities, legal protection afforded these species, penalties for violations of Federal and State laws,

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~~and project features designed to reduce direct and indirect impacts to these species. complete a pre-construction survey for special status species in the portion of the project corridor west of Harmony Grove Road within seven days prior to the start of construction activities. Should special status species or their sign (including burrows) be found adjacent to the maintenance road, those that are not listed under the federal or state Endangered Species Act (FESA/CESA) shall be captured and relocated off site to nearby natural areas in or adjacent to Escondido Creek as appropriate dependent on the habitat requirements of the captured species. The recipient sites shall be comprised of natural vegetation with earthen, unlined substrates. Construction personnel shall temporarily halt restriping activities if a lizard is observed ahead of restriping equipment on the maintenance road, until the lizard is no longer present on the road.~~

BIO-2 Pre-Construction Bat Acoustic Survey

~~To the extent feasible, the City shall limit construction activities associated with the proposed trail improvements to outside of the typical bat roosting season, which extends from approximately March to September. No less than 30 days prior to vegetation removal, A qualified biologist (approved by CDFW) with expertise and experience conducting bat surveys, shall be retained by the City as a Designated Bat Biologist to conduct a two pre-construction reconnaissance surveys to identify trees or structures that provide suitable bat roosting habitat.~~

~~The Designated Bat Biologist shall conduct a bat survey within the project corridor (plus a 100-foot buffer as access allows) to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts, especially within trees surrounding Escondido Creek. The survey shall occur during the roosting season (approximately March-September), using acoustic technology and emergency counts to determine the presence maximize detection of bats roosts on-site. Night roosts are typically utilized from the approach of sunset until sunrise. Maternity colonies, composed of adult females and their young, typically occur from spring through fall.~~

~~No less Within 30 60 days prior to construction vegetation removal, the a Designated qualified Bat Biologist will shall conduct a pre-construction reconnaissance bat survey of the queen palm trees to be removed and the Date Street pedestrian bridge structure near Date Street that provide suitable bat roosting habitat (plus a 100-foot buffer as access allows) to identify the presence or absence of any night or maternity roosts. If a maternity roost is determined to be present, a Bat Mitigation and Avoidance Plan shall be developed for CDFW's approval. The Bat Mitigation and Avoidance Plan shall require a 300-foot no work buffer shall be placed around the roost and no work shall occur within the buffer until after the roosting season is over. Work may proceed after a qualified biologist is able to verify that the roost is no longer active.~~

BIO-3 Nesting Bird Surveys

If construction must begin within the breeding season (February 1 through August 31), then the City shall retain a qualified biologist to conduct a pre-construction nesting bird survey no more than three days prior to initiation of ground disturbance and/or vegetation removal activities. The pre-construction survey shall be conducted within the project site, plus a 300-foot no work buffer (500-foot for raptors), on foot, and within inaccessible areas (i.e., private properties) afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California coastal communities. If nests are found, an avoidance buffer (which is dependent upon the species, the proposed work activity, and existing disturbances associated with land uses in and around the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means

to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Encroachment into the buffer may occur only at the discretion of the qualified biologist.

Significance after Mitigation

Implementation of Mitigation Measures BIO-1 through BIO-3 would ensure protection of special-status bats, nesting birds, and coastal whiptail. These measures would reduce the potentially significant impact to special-status species to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- b. Would the project 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?*

Plant communities are considered sensitive if they have limited distributions or high wildlife value, include sensitive species, or are particularly susceptible to disturbance. CDFW ranks sensitive communities as "threatened" or "very threatened" and keeps records of their occurrences in CNDDDB. Similar to special-status plant species, vegetation alliances are ranked 1 through 5 based on NatureServe's (2010) methodology, with those alliances ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. According to CNDDDB, southern cottonwood willow riparian forest, a state sensitive habitat (G3, S3.2), has been recorded at the southwestern terminus of the project. This community was recorded in 1987 and is now identified as riparian coast live oak forest. Because the project would not involve ground disturbance in this area, it would not have a direct impact on the sensitive habitat community. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Escondido Creek is considered a State and federal protected wetland and perennial creek. The extent of the wetland area is limited to the creek channel. No work will occur within the creek channel or wetland habitat. The project would not have an indirect adverse impact on wetlands with implementation of required best management practices to control erosion and stormwater runoff during construction, as described below in Section 10, *Hydrology and Water Quality*.

LESS THAN SIGNIFICANT IMPACT

- d. Would the project 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?*

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return.

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Others may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

Wildlife movement corridors can be both large and small scale. Regionally, the City is not located within an Essential Connectivity Area (ECA) as mapped in the report California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California (Spencer et al. 2010). ECAs represent principal connections between Natural Landscape Blocks. ECAs are regions in which land conservation and management actions should be prioritized to maintain and enhance ecological connectivity. ECAs are mapped based on coarse ecological condition indicators, rather than the needs of species and thus serve most species in each region. No mapped wildlife movement corridors are present in the project site. Additionally, the only natural habitat along the creek occurs in the southwestern portion, and the creek continues into the urban core of Escondido as it travels northeast. Wildlife movement along the creek within the urban core would be limited to urban-adapted species.

Escondido Creek supports a diversity of wildlife and has several tributary creek channels which could serve as movement corridors for urban-adapted species throughout the City. The project could have temporary adverse effects on the movement of these species during construction, limited to specific activities including installation of temporary fencing, night lighting, construction noise, construction of multi-use paths, and the presence of construction personnel during working hours. Proposed nighttime lighting would have downward shielding to minimize light spillage into the surrounding habitat, minimizing adverse effects on wildlife from light pollution. The proposed trail expansion and renovations would occur along already existing pathways in a creek corridor and therefore would not result in significant changes to the genetic connectivity among local populations of wildlife, or within a broader regional context. The project is not expected to prevent local wildlife movement because species utilizing Escondido Creek within the urban core are adapted to existing urban conditions and disturbances. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Section 33-1052 of the Escondido Municipal Code defines protected trees as follows:

“Protected tree is any oak (genus Quercus) which has a ten (10) inch or greater DBH, or any other species or individual specimen listed on the local historic register, or determined to substantially contribute to the historic character of a property or structure listed on the local historic register, pursuant to Article 40 of the Escondido Zoning Code.”

Even though oak trees that meet the above definition are located along Escondido Creek and at the downstream end of the project site at the SDG&E easement west of Harmony Grove Road, the project would not involve removal of or encroachment upon any oak trees.

The expansion of the Escondido Creek Trail is identified as a planned trail in the Resource Conservation Element of the City of Escondido General Plan (Escondido 2012a). No conflict with General Plan policies would occur as the trail has already been factored into General Plan buildout. As discussed in item 4.a, the project would have a less than significant impact to sensitive habitat with mitigation incorporated. Therefore, the impact regarding conflicts with local policies or ordinances protecting biological resources would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- f. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Multiple Habitat Conservation Program

Escondido is inside the boundaries of the San Diego Association of Governments (SANDAG) Final Multiple Habitat Conservation Program (MHCP). The MHCP serves as a habitat conservation plan, pursuant to Section (a)(1)(B) of the federal Endangered Species Act, as well as a natural communities conservation plan under the California Natural Communities Conservation Planning Act of 1991. The MHCP is one of three, large multiple-jurisdictional habitat planning efforts in San Diego County that identifies priority areas for conservation and other areas for future development in northwestern San Diego County. The MHCP was approved in 2004 under a 50-year permit with seven participating cities: Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista. It covers 111,908 acres with the goal to conserve approximately 19,000 acres of habitat.

The MHCP identifies a series of Focus Planning Areas (FPAs) which will be dedicated for preservation of native habitats. These areas contain both “hard line” areas, which will be preserved as open space, and “soft line” areas, which will include both development and open space to be determined through the planning process (AMEC et al. 2003a, 2003b). The project site does not occur within a designated FPA.

The MHCP identifies Biological Core and Linkage Areas (BCLA) as those areas determined biologically valuable for inclusion in the regional preserve system (AMEC et al. 2003a, 2003b). BCLAs were designed to conserve sensitive species and corridors between areas of high-quality habitat and to provide avenues for wildlife movement between these areas. The project site does not occur within a designated BCLA.

The MHCP identifies 77 covered species (29 plants and 48 animals), which are provided take authorization under the MHCP. The federal action addressed in the MHCP is the issuance of incidental take permits for all species on the covered species list whether they currently are listed or are to be listed in the future.

City of Escondido Draft Subarea Habitat Conservation Plan/Natural Communities Conservation Plan

The City’s Draft Subarea Habitat Conservation Plan/Natural Communities Conservation Plan (Escondido SHCP) comprehensively addresses how the City will conserve natural biotic communities and sensitive plant and wildlife species. The Escondido SHCP has not been formally approved and adopted, so all projects are required to obtain applicable permits for impacts to listed species as per Section 10 or Section 7 of the federal Endangered Species Act. The mitigation requirements for impacts to biological resources are based on ratios provided by the approved MHCP (AMEC et al. 2003a, 2003b). Although the Escondido SHCP has not been approved yet, the City has used the plan as a guide for open space design and preservation. The vegetation communities in the project area include urban/developed, eucalyptus woodland, and riparian scrub. Only riparian scrub is protected in accordance with the Escondido SHCP, with no net loss required as part of the larger MHCP’s requirements. As no direct impacts to riparian habitat are anticipated, impacts related to consistency with the SANDAG MHCP would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 (or conflict with applicable historic thresholds specified in City of Escondido Zoning Code Article 47)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section provides an analysis of the proposed project’s impacts on cultural resources, including historical and archaeological resources, as well as human remains, and is based on Rincon’s Cultural Resources Assessment Memorandum attached as Appendix B.

CEQA requires that a lead agency determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC], Section 21084.1) and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). State CEQA Guidelines Section 15064.5 also states the term “historical resources” shall include the following:

- 1) A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR (Public Resources Code [PRC] Section 5024.1, Title 14, CCR, Section 4850 et. seq.).
- 2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates it is not historically or culturally significant.
- 3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1, Title 14 CCR, Section 4852) as follows:
 - Is associated with events which have made a significant contribution to the broad patterns of California’s history and cultural heritage

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- Is associated with the lives of persons important in our past
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
- Has yielded, or may be likely to yield, information important in prehistory or history (State CEQA Guidelines Section 15064.5)

Properties listed on the National Register of Historic Places (NRHP) are automatically listed on the CRHR, along with State Landmarks and Points of Interest. The CRHR can also include properties designated under local ordinances or identified through local historical resource surveys.

The “Resource Conservation Element” Section of the City of Escondido’s General Plan includes the following:

- Goal 5: Preservation of important cultural and paleontological resources that contribute to the unique identity and character of Escondido.
- Cultural Resources Policy 5.1: Maintain and update the Escondido Historic Sites Survey to include significant resources that meet local, state, or federal criteria.
- Cultural Resources Policy 5.2: Preserve significant cultural and paleontological resources listed on the national, State, or local registers through: maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process.
- Cultural Resources Policy 5.3: Consult with appropriate organizations and individual (e.g., South Coastal Information Center of the California Historical Resources Information System, Native American Heritage Commission, Native American groups and individuals, and San Diego Natural History Museum) early in the development process to minimize potential impacts to cultural and paleontological resources.
- Cultural Resources Policy 5.4: Recognize the sensitivity of locally significant cultural resources and the need for more detailed assessments through the environmental review process.
- Cultural Resources Policy 5.5: Preserve historic buildings, landscapes, and districts with special and recognized historic or architectural value in their original locations through preservation, rehabilitation (including adaptive reuse), and restoration where the use is compatible with the surrounding area.
- Cultural Resources Policy 5.6: Review proposed new development and/or remodels for compatibility with the surrounding historic context.
- Cultural Resources Policy 5.7: Comply with appropriate local, State, or federal regulations governing historical resources.
- Cultural Resources Policy 5.8: Consider providing financial incentives, and educational information on existing incentives provided by the federal government to private owners and development in order to maintain, rehabilitate, and preserve historic resources.
- Cultural Resources Policy 5.9: Educate the public on the City’s important historic resources in increased awareness for protection (City of Escondido 2012a).

To address historical resources and archaeological resources, a cultural resources study was prepared for the project, including a cultural resources records search at the South Coastal Information Center (SCIC), a search of the Native American Heritage Commission’s (NAHC) Sacred Lands File (SLF), and pedestrian survey of the proposed project site.

The SCIC records search identified 94 cultural resources studies previously conducted within 0.5-mile of the project site (Attachment A). A portion of 22 of these studies overlap with the current project site. Three of these studies, SD-17745 (Smith et al. 2018), SD-18356 (Stropes and Smith 2012), and SD-18357 (Stropes and Smith 2016) discuss the archaeological testing and evaluation of resource P-37-12209/H, the recorded boundary of which overlaps the project site. The SCIC records search identified 455 previously recorded cultural resources within a 0.5-mile radius of the project site (Attachment A). These resources include 423 historic-period resources consisting of 418 buildings (predominantly residential), four refuse scatters, one road, one park, and one well; 30 resources of Native American origin including 26 sites and four isolated artifacts; and two multicomponent resources consisting of both prehistoric and historic-period components. As mentioned above, the recorded boundary of resource P-37-12209/H, a CEQA-significant multicomponent archaeological site, overlaps the final 82 feet (25 meters) of the western terminus of the project site. Resource P-37-12209/H is the only resource with recorded boundaries within the project site.

Resource P-37-12209/H was initially recorded by Jane Lenker in 1978 as a surface scatter of lithics. Subsequent studies (Stropes and Smith 2012; Stropes and Smith 2016; Smith et al. 2018) have since determined that P-37-12209/H is a two acre multicomponent archaeological site, consisting of prehistoric Native American habitation elements comprised of hundreds of milling features, surface scatters and subsurface deposits of lithic and pottery, faunal remains, at least one human cremation burial, pictographs, an historic-period reservoir, and two historic-period residences across four loci. The southeastern edge of the recorded boundary of Locus 1 overlaps the final 25 meters of the western terminus of the project site. The prehistoric components of site P-37-12209/H are likely part of a larger village complex that includes resource P-37-8280, recorded less than 0.25-mile to the south, on the opposite bank of Escondido Creek.

Beginning in 2010, Brian F. Smith and Associates, Inc. (BFSA) became involved in an ongoing archaeological study for the planned construction of the Citracado Parkway Extension Project as part of the City's engineering design of the roadway and for the environmental compliance documentation required under CEQA. Following subsurface testing of the site in 2012, BFSA recommended resource P-37-12209/H CRHR eligible (City of Escondido 2012b; Stropes and Smith 2012). In 2014, the City of Escondido applied for a Clean Water Act Section 404 Permit for the Citracado Parkway Extension Project and BFSA prepared the supporting Section 106 (National Historic Preservation Act [NHPA]) report (Stropes and Smith 2016). As a result of the Section 106 study which involved Phase III data recovery excavations, a recommendation of eligibility for listing on the NRHP was provided for P-37-12209/H (Stropes and Smith 2016). Archaeological studies conducted for the Citracado Parkway Extension Project established Native American occupation of the site between approximately 5,630 Before Present (BP) and 300 BP (Stropes and Smith 2012; Stropes and Smith 2016).

Rincon contacted the NAHC on September 3, 2020, to request an SLF search of the project site and a 0.5-mile radius. As part of this request, Rincon asked the NAHC to provide a list of Native American groups and/or individuals culturally affiliated with the area who may have knowledge of cultural resources within the project site. The NAHC responded on September 22, 2020, stating the results of the SLF search were positive. The positive SLF result is likely related to the fact that the recorded boundary of resource P-37-12209/H is within the western terminus of the project site. As the CEQA lead agency, the City of Escondido is responsible for conducting Native American consultation for the project in compliance with Assembly Bill 52.

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A review of historical aerial photographs and topographic maps indicates Escondido Creek was channelized between 1964 and 1967 (NETROnline 1964 and 1967). Aerial photographs taken in 1978 show the transformation of the project corridor, which was increasingly occupied by residential and commercial development in the 1970s, a stark difference between an area largely characterized by agricultural development in the 1940s and 50s (NETROnline Var.). Aerial photography from the late 1990s onward depicts the project site largely as it is today with paved surfaces lining the Escondido Creek Trail (NETROnline Var.).

Rincon Archaeologist, Mark Strother, MA, Registered Professional Archaeologist (RPA), conducted a pedestrian survey of the proposed project site on February 11, 2021. Overall, ground visibility was poor (approximately 10 to 20 percent) as much of the project site is developed with the existing paved trail. Areas of exposed ground surface are confined to the shoulders of the alignment. Exposed soils throughout the project site consist of light to medium-brown sandy loam, typically intermixed with gravel and/or decomposing granite. No cultural resources were identified within the project site during the survey. The survey confirmed the presence of prehistoric components attributed to P-37-12209/H including bedrock milling slicks and surficial lithic flakes adjacent to the western terminus of the project site. Although the recorded boundaries of the resource overlap the project site, no elements of the resource were observed within the project site during the survey. Rincon provides an update to the resource record in Attachment D. The project will not impact this resource because no ground disturbance will occur within its vicinity.

- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 (or conflict with applicable historic thresholds specified in City of Escondido Zoning Code Article 47)?*

As discussed above, there are 455 previously recorded cultural resources within 0.5-mile of the project site. Of these, there are 423 historic-period resources consisting of 418 buildings (predominantly residential), four refuse scatters, one road, one park, and one well. However, the cultural resources memorandum identified no historical resources within or adjacent to the project site. Therefore, no impact to historical resources would occur because of the proposed project.

NO IMPACT

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?*

The cultural resources study undertaken for this project included a resources records search, archival research, a search of the NAHC's SLF that returned a positive result, and field survey that resulted in updating the record of one previously recorded resource, P-37-12209/H, a multicomponent archaeological site consisting of prehistoric Native American habitation elements, an historic-period reservoir, and two historic-period residences. The background research concluded the recorded boundary of resource P-37-12209/H extends into the project corridor. An archaeological survey of the project site confirmed the presence of P-37-12209/H adjacent to the western terminus of the project site, but did not identify any components within the project site and no other resources were identified. The project has been specifically designed to avoid resource P-37-12209/H. Project-related work in the vicinity of Citracado Parkway will not involve ground disturbance and will be limited to sealing and striping the existing paved roadway; no impacts to resource P-37-12209/H will occur. However, given the presence of 30 resources of Native American origin and two multicomponent archaeological sites that include prehistoric components within 0.5-mile of the project corridor, the project site should be considered sensitive for archaeological

resources. The current project is directly adjacent to Escondido Creek, which would have served as a freshwater source and provided resources favorable to human occupation prior to its channelization in the 1960s, as evidenced by other nearby prehistoric sites located within 0.5-mile of the creek. Due to the high sensitivity of the project site for archaeological resources, mitigation would be necessary to reduce impacts to a less-than-significant level.

Mitigation Measures

CUL-1 Pre-Excavation Agreement

Prior to the issuance of a grading permit, the Applicant shall enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a Pre-Excavation Agreement) with a tribe that is traditionally and culturally affiliated with the Project Location (“TCA Tribe”). The purposes of the agreement are (1) to provide the Applicant with clear expectations regarding tribal cultural resources, and (2) to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the Project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground-disturbing activities. The agreement shall incorporate, at a minimum, the performance criteria and standards, protocols, and procedures set forth in mitigation measures M-CR-2 through M-CR-XX, and the following information:

- Parties entering into the agreement and contact information.
- Responsibilities of the Property Owner or their representative, archaeological monitors, and tribal monitors.
- Project grading and development scheduling, including determination of authority to adjust in the event of unexpected discovery, and terms of compensation for the monitors, including overtime and weekend rates, in addition to mileage reimbursement.
- Requirements in the event of unanticipated discoveries, which shall address grading and grubbing requirements including controlled grading and controlled vegetation removal in areas of cultural sensitivity, analysis of identified cultural materials, and on-site storage of cultural materials.
- Treatment of identified Native American cultural materials.
- Treatment of Native American human remains and associated grave goods.
- Confidentiality of cultural information including location and data.
- Negotiation of disagreements should they arise.
- Regulations that apply to cultural resources that have been identified or may be identified during project construction.

CUL-2 TCA Tribe Retention Verification

Prior to issuance of a grading permit, the Applicant shall provide written verification to the City that a qualified archaeologist and a Native American monitor associated with a TCA Tribe have been retained to implement the monitoring program. The archaeologist shall be responsible for coordinating with the Native American monitor. This verification shall be presented to the City in a letter from the Project archaeologist that confirms the selected Native American monitor is

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associated with a TCA Tribe. The City, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.

CUL-3 Archaeologist and Monitor Pre-construction Meetings

The qualified archaeologist and a Native American monitor shall attend all applicable pre-construction meetings with the General Contractor and/or associated subcontractors to explain and coordinate the requirements of the monitoring program.

CUL-4 Archaeologist and Monitor Observation

During ~~excavation and grading outside of previously filled or disturbed soils the initial grubbing, site grading, excavation or disturbance of the ground surface~~ (including both on- and off-site improvement areas), the qualified archaeologist and the Native American monitor shall be present full-time. If the full-time monitoring reveals that the top soil throughout the Project impact area (both on and off-site) has been previously removed during the development of the roads and buildings within the Project area, then a decrease of monitoring to part-time monitoring or the termination of monitoring can be implemented, as deemed appropriate by the qualified archaeologist in consultation with the Native American monitor. The frequency of subsequent monitoring shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring considering these factors. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits (i.e., soil conditions are comprised solely of fill or granitic bedrock).

CUL-5 Discovery of Unidentified Resources Work Halt Procedures

In the event that previously unidentified tribal cultural resources are discovered, all work must halt within a 100-foot radius of the discovery. The qualified archaeologist and the Native American monitor shall evaluate the significance of the find and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The qualified archaeologist and Native American Monitor shall consider the criteria identified by California Public Resources Code sections 21083.2(g) and 21074, and CEQA Guidelines sections 15064 and 15064.5(c) in determining the significance of a discovered resource. If the professional archaeologist and Native American monitor determine that the find does not represent a culturally significant resource, work may resume immediately, and no agency notifications are required. Isolates and clearly non-significant deposits shall be documented in the field and collected, and monitored grading can immediately proceed. All unearthed archaeological resources or tribal cultural resources shall be collected, temporarily stored in a secure location, and repatriated for later reburial on the project site, pursuant to the terms of the Pre-Excavation Agreement.

CUL-6 Discovery of Unidentified Resources Notification Procedures

If the qualified archaeologist and Native American monitor determine that the find does represent a potentially significant tribal cultural resource, considering the criteria identified by California Public Resources Code sections 21083.2(g) and 21074, and CEQA Guidelines sections 15064 and 15064.5(c), the archaeologist shall immediately notify the City of said discovery. The qualified archaeologist, in consultation with the City, the consulting TCA Tribe(s), and the Native American monitor, shall determine the significance of the discovered resource. A recommendation for the

tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe(s) and be submitted to the City for review and approval. If the find is determined to be a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) through (c), appropriate treatment measures will be implemented. Work may not resume within the no-work radius until the City, through consultation as set forth herein, determines either that: 1) the discovery does not constitute a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) through (c); or 2) the approved treatment and disposition measures have been completed.

CUL-7 Sacred Site Avoidance

All sacred sites, significant tribal cultural resources, and unique archaeological resources encountered within the Project area shall be avoided and preserved as the preferred mitigation. The avoidance and preservation of the significant tribal cultural resource or unique archaeological resource must first be considered and evaluated in consultation with the TCA Tribe(s) as required by CEQA and in compliance with all relevant mitigation measures for the Project. If any significant tribal cultural resource or unique archaeological resource has been discovered and such avoidance or preservation measure has been deemed to be infeasible by the City's Director of Community Development (after a recommendation is provided by the qualified archaeologist, in consultation with the TCA Tribe(s), making a determination of infeasibility that takes into account the factors listed in California Public Resources Code sections 21061.1, 21081(a)(3), and CEQA Guidelines section 15091, and in accordance with all relevant mitigation measures for the Project), then culturally appropriate treatment of those resources, including but not limited to funding an ethnographic or ethnohistoric study of the resource(s), and/or developing a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City. No artifact sampling for analysis is allowed, unless requested and approved by the consulting TCA Tribe(s). Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.

CUL-8 Discovery of Human Remains Procedures

As specified by California Health and Safety Code section 7050.5, if human remains are found on the Project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to a temporary off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (California Public Resources Code § 5097.98) for proper treatment and disposition in accordance with California Public Resources Code section 5097.98. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If

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the City does not agree with the recommendations of the MLD, the NAHC can mediate (California Public Resources Code § 5097.94). If no agreement is reached, the remains shall be kept in situ, or reburied in a secure location in close proximity to where they were found and where they will not be further disturbed (California Public Resources Code § 5097.98). Work may not resume within the no work radius until the lead agency, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction. The analysis of the remains shall only occur on site in the presence of the MLD, unless the forensic anthropologist and the MLD agree to remove the remains to an off-site location for examination.

CUL-9 Procedures for Collection and Cataloging of Resources

If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any cataloging of those resources. Moreover, if the qualified archaeologist does not collect the cultural resources that are unearthed during the ground-disturbing activities, the Native American monitor may, at their discretion, collect said resources for later reburial on the Project site or storage at a local curation facility. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe for reburial on the Project site. Should the TCA Tribe(s) decline the collection, the collection shall be curated at the San Diego Archaeological Center. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor, to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center.

CUL-10 Procedures for Release of Grading Bond

Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, that describes the results, analysis, and conclusions of the archaeological monitoring program and any data recovery program on the Project site, shall be submitted by the qualified archaeologist to the City. The Native American monitor shall be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report will include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources. A copy of the final report will be submitted to the South Coastal Information Center after approval by the City.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

No human remains have been identified within the project site. The discovery of unknown human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states no further disturbance shall occur until the County Coroner has decided on the origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner would notify the Native American Heritage Commission, which would determine and notify a most likely descendant (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. Therefore, impacts related to the discovery of human remains would be less than significant.

LESS THAN SIGNIFICANT IMPACT

6 Energy

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

Energy Setting

Escondido’s primary sources of energy are electricity and natural gas provided by San Diego Gas and Electric (SDG&E), which is a subsidiary of Sempra Energy (Escondido 2012a). SDG&E operates Palomar Energy Center, a 565-megawatt natural gas power plant that generates electricity, in the Escondido Research & Technology Center (Escondido 2012a; SDG&E 2018). The provider also has a 30-megawatt lithium-ion battery storage facility in Escondido (SDG&E 2020).

In 2018, the most recent year for which data is available, SDG&E’s power mix was 29 percent natural gas, 21 percent wind, 20 percent solar, 2 percent biomass and biowaste, and 27 percent unspecified (from transactions that are not traceable to specific generation sources) (California Department of Energy 2019). Forty-three percent of the provider’s power mix was classified as renewable, which exceeded the statewide figure of 31 percent.

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

Construction of the project would result in short-term consumption of energy from the use of construction equipment and processes. Energy use during construction would be primarily from fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. The scope of construction activity that requires energy use would be limited because many facilities would simply require restriping of or surface treatments on existing paved rights-of-way, while others would add narrow linear strips of pavement to widen existing roadways or construct new shared-use paths. Therefore, the project would not result in wasteful or inefficient use of energy during construction.

After construction, proposed active transportation projects would provide a safe and better connected non-motorized transportation system, facilitating an increase the number of bicyclists and pedestrians and a decrease in the number of motor vehicle trips. Decreasing the number of personal vehicles on roadways would reduce overall energy consumption, mainly from fuel

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consumption. Some proposed shared-use paths, pedestrian routes to public transportation stations, and crosswalk enhancements would include light fixtures that would require energy use at nighttime. However, energy for lighting would be minimal relative to existing lighting and offset by the reduced use of fossil fuels for vehicle transport. Therefore, the Plan would have no impact from wasteful, inefficient, or unnecessary consumption of energy resources.

NO IMPACT

- b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The City of Escondido has not adopted an energy efficiency plan. However, the Escondido 2012 General Plan, Chapter three; *Mobility and Infrastructure*, contains goals and policies 16.1-16.13 aimed at increased use of renewable energy sources, and improved energy conservation and efficiency. The project, by improving the active transportation network, would result in an overall reduction in motor vehicle trips and an improvement in energy efficiency with the city consistent with policies laid out in the General Plan. Including energy Policy 16.3 that states, the City will implement energy conserving land use practices that include compact development, provision of bikeways and pedestrian paths, and the incorporation of transit routes and facilities. Therefore, the Plan would not conflict with any state or local plans for energy efficiency, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The project corridor is located in the Peninsular Ranges geomorphic province of Southern California (Escondido 2017). A geomorphic province is a region of unique topography and geology that is distinguished from other regions based on its landforms and geologic history. The Peninsular Ranges province encompasses an area that extends 900 miles from the Transverse Ranges and the Los Angeles Basin south to the tip of Baja California. In general, the province consists of rugged mountains composed of Mesozoic igneous and metamorphic rocks to the east and a dissected coastal plain on Cenozoic sediments to the west. The province varies in width from approximately 30 to 100 miles and is traversed by a group of faults and fault zones trending roughly northwest.

The project corridor is part of a riparian corridor mapped as consisting of young alluvial floodplain deposits from the Holocene and late Pleistocene epochs (Qya) (Kennedy and Tan 2007). The Holocene epoch refers to approximately the last 11,700 years since the preceding glacial period. Paleontological resources are found in sedimentary strata of San Diego County, which primarily underlies the coastal plain, the desert and some mountain valleys (San Diego County 2017a). The project site is not located in a geologic unit with sedimentary strata. Therefore, the project corridor does not have a high potential for paleontological sensitivity.

Regulatory Setting

State Regulations

State geotechnical regulations applicable to the plan area include the Alquist-Priolo Earthquake Fault Zoning Act, the Seismic Hazards Mapping Act, and the California Building Code (CBC).

ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING ACT

The Alquist-Priolo Act provides for special seismic design considerations if developments are planned in areas adjacent to active or potentially active faults. Under the Act, development of a building for human occupancy is generally restricted within 50 feet of an identified fault.

SEISMIC HAZARDS MAPPING ACT

The Seismic Hazards Mapping Act addresses geo-seismic hazards, other than surface faulting, and applies to public buildings and most private buildings intended for human occupancy. The Seismic Hazards Mapping Act identifies and maps seismic hazard zones to assist cities and counties in preparing the safety elements of their general plans and encourages land use management policies and regulations that reduce seismic hazards. The Act mandated the preparation of maps delineating "Liquefaction and Earthquake-Induced Landslide Zones of Required Investigation."

CALIFORNIA BUILDING CODE

The CBC requires, among other things, seismically resistant construction and foundation and soil investigations prior to construction. The CBC also establishes grading requirements that apply to excavation and fill activities and requires the implementation of erosion control measures. The City is responsible for enforcing the 2019 CBC.

Local Regulations

CITY OF ESCONDIDO GENERAL PLAN

The Community Protection Element addresses seismicity and soils within the city (Escondido 2012a). The City aims to avoid new development projects in areas susceptible to erosion and sediment loss and also requires new development projects to complete a City-approved geotechnical study to mitigate any potential geologic or seismic hazards.

CITY OF ESCONDIDO MUNICIPAL CODE

Chapter 6, Article 1 of the Escondido Municipal Code adopts the 2019 CBC by reference. Chapter 6, Article 13 sets requirements for the investigation and treatment of expansive soils prior to construction of buildings. Chapter 33, Article 55 establishes grading and erosion control regulations for Escondido. The purpose of this article is to ensure that development occurs in a manner which protects the natural and topographic character and identity of the environment, visual integrity of hillsides and ridgelines, sensitive species and unique geologic/geographic features, and the health, safety, and welfare of the general public. This article regulates grading on private and public property and includes standards and design criteria to control storm water and erosion during construction activities. The ordinance sets forth rules and regulations to control excavation, grading, earthwork construction (including fills and embankments), and development on hillsides and along ridgelines; establishes the administrative procedures for the issuance of permits; and provides for approval of plans and inspection of grading construction in compliance with storm water management requirements.

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

Faults generally produce damage in two ways: ground shaking and surface rupture. Surface rupture is limited to an area very near the fault trace. No mapped faults occur in the immediate vicinity of the project corridor. Several fault traces are mapped to the west of Country Club Drive, as close as approximately one mile from the western terminus of the project corridor (Kennedy and Tan 2007). A northwest-southeast trending fault is mapped at the eastern edge of Lake Dixon. This fault is approximately 1.5 miles northeast of the eastern terminus of the project corridor. The nearest known active fault is the Elsinore fault, a branch of the San Andreas fault zone located almost 20 miles northeast of the project corridor, which is the dominant source of potential ground motion in the region (Escondido 2017; San Diego County 2017b). The U.S. Geological Survey (USGS) defines active faults as those that have had surface displacement within Holocene time (about the last 11,700 years). Because known earthquake faults are not mapped within the project corridor, the project would not result in the exposure of recreational users at the Escondido Creek Trail to a substantial risk of fault rupture. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Seismic ground shaking is the vibration of the ground during an earthquake (San Diego County 2017b). When a fault ruptures, seismic waves radiate, causing the ground to vibrate. The severity of

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the vibration increases with the amount of energy released and decreases with distance from the causative fault or epicenter. One way to express an earthquake's severity is to compare its peak ground acceleration (PGA) to the normal acceleration due to gravity (980 cm/sec/sec, or "g"). A 100% g earthquake is very severe. The risk level associated with earthquakes is considered high if an area lies within a 0.3 or greater PGA designation. In modeling of earthquake hazards for San Diego County, the city of Escondido has a 10 percent probability of experiencing PGA from 0.16 g to 0.25 g in the next 50 years (San Diego County 2017b). Earthquake hazards are higher in eastern San Diego County, closer to the Elsinore and San Jacinto fault systems.

Strong ground shaking at the project corridor could result from a rupture of faults in the San Diego region. Such strong ground shaking could damage pavement at the renovated Escondido Creek Trail. However, the City would resurface pavement that is substantially damaged by ground shaking to prevent a long-term risk of injury. The project also does not include proposed bridges or habitable structures that could be vulnerable to collapse during ground shaking. Therefore, the project would not expose people or structures to substantial adverse effects of seismic ground shaking. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction occurs when occurs when ground shaking causes loose soils to lose strength and act like viscous fluid (San Diego County 2017b). It is most common in soils with sand and silt or on reclaimed lands. In these areas, liquefaction can cause two kinds of ground failure: 1) lateral spread on slopes, where large masses of soil move sidelong as the underlying layer liquefies, and 2) a loss of bearing strength in the soil, collapsing structures. Liquefaction is not known to have occurred historically in San Diego County. Figure VI-9 in the City's General Plan maps the project corridor as a liquefaction hazard area approximately from the I-15 overpass to the eastern terminus at N. Midway Drive (Escondido 2012a). Liquefaction during an earthquake could damage pavement on the renovated trail. However, the project would not include habitable structures that could expose people to adverse effects from seismic-related ground failure, including liquefaction. Furthermore, the proposed trail expansion and renovation would not increase existing exposure to liquefaction by users of the Escondido Creek Trail. Therefore, the project would have a less than significant impact from seismic-related ground failure.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Landslides occur when masses of rock, earth, or debris move down a slope, including rock falls, deep failure of slopes, and shallow debris flows (San Diego County 2017b). Frequently they accompany other natural hazards such as floods and earthquakes. As mapped in Figure VI-9 in the City's General Plan, the project corridor does not have soils or extreme slopes vulnerable to landslides (Escondido 2012a). Therefore, the project would have a less than significant impact from landslide risks.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

Grading activity during construction of the proposed trail expansion and renovation would loosen surface soils and make them susceptible to erosion by wind and water. However, because the project would involve grading on more than one acre, all construction activity would be subject to the erosion control requirements set forth by the National Pollutant Discharge Elimination System (NPDES) Storm Water General Construction Permit (Order No. 2009-0009-DWQ). As described in Section 10, *Hydrology and Water Quality*, with compliance with existing regulations, substantial erosion during construction would not occur. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project 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?

As discussed above, the project corridor is not subject to a substantial risk of landslides. Although it is at risk of liquefaction and lateral spreading, the project would not introduce habitable structures that are vulnerable to seismic-related ground failure. Therefore, the project would not increase the existing risk of liquefaction and lateral spreading along Escondido Creek. The proposed trail expansion and renovation also would not involve major excavation or grading that could increase the instability of underlying geologic units or soil. Therefore, the project would have a less than significant impact related to geologic or soil instability.

LESS THAN SIGNIFICANT IMPACT

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

Clay-rich soils that shrink and swell depending on water content are called expansive soils. According to the Natural Resource Conservation Service's (NRCS) Web Soil Survey, multiple soil types that occur in and near the project corridor have a moderate to high potential for shrinking and swelling behavior, including but not limited to Chino fine sandy loam, Fallbrook sandy loam, Fallbrook rocky sandy loam, Las Posas fine sandy loam, and Placentia sandy loam (NRCS 2021). In areas underlain by expansive soils, the shrinking and swelling of soil can disrupt or damage paved surfaces. However, the proposed trail expansion and renovation would occur on previously graded and paved ground that is likely underlain by fill material with a lower risk of expansiveness than the native soil. Even if proposed features are underlain by expansive soil, they would not alter the existing trail's susceptibility to expansive soil or increase the exposure of recreational users to this risk. Therefore, the risks attributed to the project with regard to expansive soils would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project 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?

The project would not involve the construction of septic tanks or alternative wastewater disposal systems. No impact would occur.

NO IMPACT

- f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, diagnostically important, or are common but have the potential to provide valuable scientific information for evaluating evolutionary patterns and processes, or which could improve our understanding of fossil chronologies, the ecology and geographic distribution of fossil organisms, or the history of geologic layers. Evaluating the potential for impacts to paleontological resources from implementing the Plan involves three distinct steps: 1) identify the geologic units that occur (i.e., are mapped at the surface or may be directly underlying mapped units) within the study area; 2) determine the paleontological sensitivity of mapped or underlying geologic units; and 3) determine if the project has the potential to disturb paleontologically sensitive geologic units.

Paleontological Resource Potential

The Society of Vertebrate Paleontology (SVP) (2010) describes sedimentary rock units as having a high, low, undetermined, or no potential for containing significant nonrenewable paleontological resources. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. While these standards were written specifically to protect vertebrate paleontological resources, all fields of paleontology have adopted these guidelines, which are given here verbatim:

- I. **High Potential (sensitivity)** – Rock units from which significant vertebrate or significant invertebrate fossils or significant suites of plant fossils have been recovered are considered to have a high potential for containing significant non-renewable fossiliferous resources. These units include but are not limited to, sedimentary formations and some volcanic formations that contain significant nonrenewable paleontological resources anywhere in their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. Sensitivity comprises both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, or botanical; and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, ecologic, or stratigraphic data. Areas that contain potentially datable organic remains older than Recent, including deposits associated with nests or middens, and areas which may contain new vertebrate deposits, traces, or trackways are also classified as significant.
- II. **Low Potential (sensitivity)** – Sedimentary rock units that are potentially fossiliferous, but have not yielded fossils in the past, or contain common and/or widespread invertebrate fossils of well documented and understood taphonomic, phylogenetic species and habitat ecology. Reports in the paleontological literature or field surveys by a qualified vertebrate paleontologist may allow determination that some areas or units have low potential for yielding significant fossils prior to the start of construction. Generally, these units will be poorly represented by specimens in institutional collections and will not require protection or salvage operations. However, as excavation for construction proceeds, it is possible that significant and unanticipated paleontological resources might be encountered and require a change of classification from Low to High Potential and, thus, require monitoring and mitigation if the resources are found to be significant.

- III. **Undetermined Potential (sensitivity)** – Specific areas underlain by sedimentary rock units for which little information is available are considered to have undetermined fossiliferous potentials. Field surveys by a qualified vertebrate paleontologist to specifically determine the potentials of the rock units are required before programs of impact mitigation for such areas may be developed.
- IV. **No Potential** – Rock units of metamorphic or igneous origin are commonly classified as having no potential for containing significant paleontological resources.

Paleontological Impact Analysis

As discussed above, the project corridor is in a riparian area with alluvial surface deposits, which does not have a high potential for containing paleontological resources. Intact Holocene deposits are typically considered too young to preserve paleontological resources and are assigned a low paleontological sensitivity. It is anticipated that grading for the project would extend up to five feet below ground surface, for the purpose of installing light fixtures, connections to the City's recycled water pipelines, and landscaping. At this depth in the mapped geologic unit, grading for the project would be unlikely to yield intact fossil resources. Furthermore, such resources if present would not be found in intact sedimentary formations that provide historical context. The project corridor also has been highly disturbed by prior grading to channelize Escondido Creek and construct maintenance roads on its banks. Ground disturbance would be relatively shallow and may primarily encounter fill material. Therefore, the impact on paleontological resources would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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8 Greenhouse Gas Emissions

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

Climate Change and Greenhouse Gas Emissions

Climate change is the observed increase in the average temperature of the earth’s atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The term “climate change” is often used interchangeably with the term “global warming,” but “climate change” is preferred to “global warming” because it helps convey that there are other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. According to the United Nations Intergovernmental Panel on Climate Change (IPCC 2013), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95 percent or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-20th century (IPCC 2013).

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with agricultural practices and landfills. Observations of CO₂ concentrations, globally-averaged temperature, and sea level rise are generally well within the range of the extent of the earlier IPCC projections. The recently

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observed increases in CH₄ and N₂O concentrations are smaller than those assumed in the scenarios in the previous assessments. Each IPCC assessment has used new projections of future climate change that have become more detailed as the models have become more advanced.

Man-made GHGs, many of which have greater heat-absorption potential than CO₂, include fluorinated gases and SF₆ (CalEPA 2006). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as “carbon dioxide equivalent” (CO₂e), and is the amount of a GHG emitted multiplied by its GWP. CO₂ has a 100-year GWP of one. By contrast, CH₄ has a GWP of 25, meaning its global warming effect is 25 times greater than CO₂ on a molecule per molecule basis over a 100-year period (IPCC 2007).

The accumulation of GHGs in the atmosphere regulates the earth’s temperature. Without the natural heat trapping effect of GHGs, Earth’s surface would be about 34° C cooler (CalEPA 2006). However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

Based on the California Air Resources Board (CARB) California Greenhouse Gas Inventory for 2000-2018, California produced 425 million metric tons (MMT) CO₂e in 2018 (CARB 2020b). The largest single source of GHG in California is transportation, contributing 40 percent of the State’s total GHG emissions. California’s total emissions are relatively high compared to other states due in part to its large size and population. However, the state’s mild climate reduces California’s per capita fuel use and GHG emissions as compared to other states. In a 2010 inventory of the City’s emissions, Escondido generated 886,118 MT CO₂e community-wide and 18,143 MT CO₂e from municipal operations (Escondido 2013).

Regulatory Setting

In response to an increase in man-made GHG concentrations over the past 150 years, California has implemented Assembly Bill (SB 32), which requires the State to reduce greenhouse gases (GHGs) to 40 percent below 1990 levels by 2030. On December 14, 2017, the California Air Resources Board (CARB) adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a statewide per capita goal of six metric tons (MT) CO₂e by 2030 and two MT CO₂e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State.

On September 10, 2018, the governor issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 32 and other legislation. EO B-55-18 also tasks CARB with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update.

In December 2013 the City adopted the Escondido Climate Action Plan (E-CAP). The E-CAP includes GHG inventories of community-wide and municipal sources based on data for the year 2010 (Escondido 2013). To meet the City’s target of reducing community-wide GHG emissions by 15

percent from 2005 levels by 2020, the E-CAP sets forth local reduction measures that encourage energy efficiency and renewable energy in buildings, transit oriented planning, water conservation, and increase waste diversion. The E-CAP also intends for implementation of statewide and local reduction measures to continue reducing community-wide GHG emissions through 2035 and beyond.

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Most individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

For projects in Escondido, Article 47 in the City's Municipal Code establishes the following thresholds to determine if a project would have a less than significant contribution to climate change:

- a. Projects that do not generate more than two thousand five hundred (2,500) metric tons (MT) of carbon dioxide equivalent (CO₂e) greenhouse gas (GHG) emissions; or
- b. Projects generating more than two thousand five hundred (2,500) MT CO₂e that have achieved one hundred (100) points implementing reduction measures outlined in the Escondido Climate Action Plan (E-CAP) screening tables, adopted by separate resolution; or
- c. Projects generating more than two thousand five hundred (2,500) MT CO₂e that demonstrate through a project specific analysis quantifying GHG emissions that through mitigation and design features, the project reduces GHG emissions consistent with the E-CAP.

Construction GHG emissions were estimated in RCEM as described under Section 3, Air Quality. The entire construction phase would generate 306 MT CO₂e (see Appendix A for air quality modeling). This would be well below the 2,500 MT CO₂e City threshold. In addition, in the long term the project would have a beneficial effect on community-wide GHG emissions in Escondido. The proposed addition of decomposed granite trail surfaces for pedestrian users of the Escondido Creek Trail, lighting, and landscaping would improve the utility and visual quality of the project corridor, making it a more attractive transportation option over vehicular use. This would have the effect of reducing vehicle miles traveled and therefore resulting in a reduction of GHG emissions for the City.

Given the vehicle miles traveled reduction benefits of an improved trail, the project would also be consistent with the City of Escondido Climate Action Plan (City of Escondido 2021b). For example, the Climate Action Plan contains the following policies that the trail improvements would support:

- **Measure T-3.2: Improve Pedestrian Infrastructure in Priority Areas.** The project would improve pedestrian infrastructure with the Escondido Creek Trail.

Escondido Creek Trail Expansion and Renovation Project

- **Measure T-3.3: Implement Safe Routes to School Program at Escondido Union School District.**
By improving pedestrian infrastructure in the Escondido Creek Trail, the project would provide a safe route between residents and nearby schools.

Therefore, the project would have a less than significant impact on the environment from GHG emissions and would not conflict with applicable plans to reduce GHG emissions.

LESS THAN SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site that is included on a list of hazardous material 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

The proposed trail expansion and renovation would not involve the transport, use, or disposal of hazardous materials other than the routine use of chemicals during construction (e.g., fuel and engine fluids for equipment, paint, and asphalt) and would not create conditions which could lead to the release of hazardous substances. Trail users would be subject to a very small risk of exposure to upset and accident conditions from the release of hazardous materials being transported on nearby travel lanes for motor vehicles or used on nearby industrial and commercial sites. However, this is not a reasonably foreseeable risk to trail users. These impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The project corridor is located within one-quarter mile of several existing schools, including Mission Middle School, Escondido Charter High School, Heritage Elementary School, Classical Academy High School, and Epiphany Prep Charter School. Ground disturbance during construction of the project could temporarily expose students and staff to emissions of fugitive dust. However, construction activity would be temporary, which would reduce the time of exposure to dust emissions. Construction also would proceed along the linear pathway of Escondido Creek Trail, which would reduce the amount of construction time near each school. Therefore, construction with one-quarter mile of schools would be short-term and would result in minimal fugitive dust emissions. In addition, operation of the project would not involve hazardous emissions or handling of hazardous materials beyond the routine application of materials like paints. The potential impact to schools would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project be located on a site that is included on a list of hazardous material 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?*

According to online databases of hazardous material sites maintained by the California Department of Toxic Substances Control (DTSC) (EnviroStor) and the California State Water Resources Control Board (SWRCB) (GeoTracker), no listed release sites that are still active or need further investigation are present in the project corridor (DTSC 2021; SWRCB 2021). However, contamination originating from one closed adjacent release case is present within the project corridor.

Closed Release Case

One closed release case with groundwater impacts is located nearby to the south of the project site. The groundwater plume associated with the release case extends north to Escondido Creek and is described further below.

1266 E. Valley Parkway – Express Gasoline #28

The release site at 1266 E. Valley Parkway is located on a nearby parcel located south of the project corridor. Groundwater sampling conducted in the vicinity of the gas station indicates that the release of gasoline from three underground storage tanks (USTs) caused soil and groundwater contamination of an ~~area~~ approximately 80,000-square foot area. Additional subsurface investigation results indicated that groundwater contamination extended north to Escondido Creek (SWRCB 2021). The Interim Remedial Action (~~IRA~~) and Corrective Action Plan (~~CAP~~) remediation activities (including free-product recovery, groundwater extraction, and soil vapor extraction with air sparging) resulted in the removal of 6,326 gallons of free product, 20,157,000 gallons of impacted groundwater, and 66,531 pounds of vapors at the site (SWRCB 2021, Heaton 2012). The remediation activities ended in 1999, and the San Diego County Department of Environmental Health and Quality (DEH) confirmed successful completion of remediation activities in 2005 following a review of site conditions, groundwater data, and weep hole data collected from the Escondido Creek concrete channel (Heaton 2012). The release case was closed by the San Diego Regional Water Quality Control Board (RWQCB) on May 2, 2014 (Gibson 2014).

While a trend analysis of groundwater data for a monitoring well in the project corridor (MW-21) was not fully completed, results show that benzene concentrations were at or near the maximum contaminant level (MCL) in 2012. Methyl tert-butyl ether (MTBE) concentrations are expected to reach the MCL by 2076. However, benzene and MTBE results from other monitoring wells (including MW-7S in the project corridor) and the estimation that residual MTBE concentrations from weep holes in the Escondido Creek channel should drop below MCLs by 2014 lead the DEH to conclude that residual impacts to ground and surface water are not expected to impact the public, or the environment (Heaton 2012).

Although the release case is closed, a residual groundwater contamination plume extends north to the project corridor at a depth of approximately 8.5 feet below grade. ~~If soil disturbance at the project will extend to groundwater in the vicinity of 1266 E. Valley Parkway, potentially significant hazardous material impacts to construction workers and public health could occur.~~

However, in this area of the project corridor the project would only involve striping of the existing trail and fencing cable installed on existing fence posts. Because no soil disturbance for the project is planned in the vicinity of 1266 E. Valley Parkway, it is anticipated that the project would not expose construction workers to health risks from the petroleum release at 1266 E. Valley Parkway.

Open Release Cases

Two properties adjacent to the project corridor are listed as active hazardous sites: 1654 E. Valley Parkway and 475 N. Spruce Street. Additionally, one property located nearby to the project corridor is listed as an active release site: 1158 East Washington Avenue. Since publication of the draft IS-MND on February 14, 2022, one additional adjacent release case (associated with the release case at 1654 E. Valley Parkway) was opened. Descriptions of these release cases are included in the following sections. The new release case at 1718 E. Valley Parkway is summarized below in conjunction with Suzy's Cleaners at 1654 E. Valley Parkway.

Escondido Creek Trail Expansion and Renovation Project1654 E. Valley Parkway – Suzy’s Cleaners and 1718 E. Valley Parkway – Former Ha’s and Economy Cleaners

The site at 1654 E. Valley Parkway and 1718 E. Valley Parkway is located at the Valley Plaza shopping center, which is adjacent to the southern side of the project corridor near N. Rose Street. Soil vapor testing indicates that dry cleaning operations at the shopping center have caused soil contamination with tetrachloroethene (PCE) (Geosyntec 2020).¹ This chemical was the most commonly used dry cleaning solvent between the 1940s and early 2000s (Geosyntec 2020). The former Ha’s Cleaners is associated with one closed release case and an additional release case was opened on August 17, 2021 as a result of nearby subsurface investigations. In April 2015, Ninyo & Moore installed six soil vapor probes below the building slab at the JoAnn Fabric store at 1680 E. Valley Parkway, which is located approximately 50 feet from a current dry cleaners (Suzy’s Cleaners) and 150 feet from a former dry cleaners (Ha’s Cleaners). The JoAnn Fabric sampling results indicate that PCE was detected in soil vapor at concentrations from 0.15 to 18 micrograms per liter (µg/L), highlighting the migration of the PCE from Ha’s Cleaners (Ninyo & Moore 2015). The highest concentrations caused a cumulative excess cancer risk above the USEPA’s threshold for an adult in a commercial/industrial setting. In January 2020, Geosyntec Consultants confirmed that PCE concentrations in soil vapor at Jo-Ann Fabrics remain above default risk thresholds for commercial and industrial settings (Geosyntec 2020). PCE was detected in soil vapor at concentrations from 0.15 to 18 micrograms per liter (µg/L) (Ninyo & Moore 2015). The highest concentrations caused a cumulative excess cancer risk above the U.S. EPA’s threshold for an adult in a commercial/industrial setting. In January 2020, Geosyntec Consultants confirmed that PCE concentrations in soil vapor at Jo-Ann Fabrics remain above default risk thresholds for commercial and industrial settings (Geosyntec 2020). Suzy’s Cleaners is likely the source of PCE contamination, but a comprehensive soil vapor survey is required to form such a conclusion (Geosyntec 2020).

Additional soil vapor sampling conducted in March 2022 at Suzy’s Cleaners, JoAnn Fabrics, and former Ha’s Cleaners in March 2022 by Innovative Environmental Solutions (IES) indicated the presence of PCE in soil vapor at concentrations from 0.0096 to 110 µg/L (IES 2022). Based on the soil and groundwater sampling results from Suzy’s Cleaners, the soil/groundwater boring located closest to the project corridor, 100 feet to the southeast, contained:

- PCE in soil vapor at 5 and 10 feet below grade (concentrations of 0.65 and 3.6 µg/L, respectively)
- VOCs, including PCE, were not detected above laboratory reporting limits in soil or groundwater samples collected from this boring

Based on the sampling results from former Ha’s Cleaners, the soil/groundwater boring located closest to the project corridor, 20 feet to the south, contained:

- PCE in soil vapor at 5 and 10 feet below grade (concentrations of 3.9 and 12 µg/L, respectively)
- Trichloroethene (TCE) in soil vapor at 10 feet below grade (concentration of 0.067 µg/L)
- PCE in soil at 0.5 feet below grade (concentration of 0.0011 milligrams per kilogram [mg/kg])
- PCE in groundwater at 15 feet below grade (concentration of 2.5 µg/L)

In response to the IES report, the San Diego RWQCB indicated that “it appears that there are two separate source areas: Suzy Cleaners and the former Ha’s/Economy Cleaners” and that additional soil, soil vapor, and groundwater samples “need to be collected” to determine the presence or

¹ Tetrachloroethene is known by a variety of alternate names and acronyms, including tetrachloroethylene, perchloroethylene, and PERC.

absence of potential PCE source material in soil, determine the lateral and vertical extents of the soil vapor plume, assess downgradient groundwater quality conditions, and determine whether contaminated groundwater (if any) has the potential to discharge to Escondido Creek (SWRCB 2022). The cases remain active and under the oversight of the San Diego Regional Water Quality Control Board (RWQCB) (SWRCB 2021).

~~The project would involve ground disturbance to install landscaping on the southern bank of Escondido Creek adjacent to the shopping center. Based on review of relevant documents, there is not enough information to conclude whether soil vapor impacts from contamination at JoAnn Fabric, or Suzy's Cleaners, or the former Ha's Cleaners has extended to the project corridor. If contamination has migrated from the shopping center to the project corridor, ground disturbance could potentially unearth soil vapor with PCE impacts. In enclosed indoor environments such as retail stores, PCE can accumulate in the air and cause adverse acute and chronic health effects from inhalation (U.S. EPA 2000).~~

Based on the lack of information regarding the extent of this release, soil, soil vapor, and/or groundwater contamination may extend north to the project corridor. If impacted soil, soil vapor, or groundwater are disturbed in the vicinity of 1654 and 1718 E. Valley Parkway, potentially significant hazardous material impacts to construction workers and public health could occur.

However, the project would only involve ground disturbance to depths of 6 to 12 inches below grade to install landscaping on the southern bank of Escondido Creek adjacent to Suzy's Cleaners. Because the planned shallow soil disturbance in the vicinity of 1654 E. Valley Parkway is not expected to encounter impacted soil or groundwater, it is anticipated that the project activities near Suzy's Cleaners (approximately 100 feet away) would not expose construction workers to health risks from the PCE release.

Additionally, the project would only involve ground disturbance to a depth of 6 inches below grade to install landscaping on the southern bank of Escondido Creek adjacent to the former Ha's Cleaners. The planned shallow soil disturbance in the vicinity of 1718 E. Valley Parkway is not expected to encounter groundwater. However, because PCE is present in shallow soil (at 0.5 foot below grade) and soil vapor (at 5 feet below grade) approximately 20 feet away, potentially significant hazardous material impacts to construction workers and public health could occur.

475 N. Spruce Street – Escondido City Maintenance Yard

The site at 475 N. Spruce Street is a City-operated public works office and maintenance yard, known as the Eastern Public Works Yard (BBC Environmental, Inc. 2012). It is bounded by Escondido Creek to the south, the Reidy Creek storm drain channel to the west, and N. Spruce Street to the east (BBC Environmental, Inc. 2012).

The DEH currently oversees a Voluntary Assistance Program (VAP) case at the Eastern Public Works Yard. The DEH and San Diego RWQCB had previous oversight of an unauthorized release case at the same site, which is now a closed case. The case was based on the leakage of petroleum hydrocarbons from several former USTs that the City removed in 1999 (EnviroApplications, Inc. 2017). The bulk of contaminated soil was at a depth of greater than 15 feet below ground surface. Historical groundwater sampling detected benzene concentrations up to 11,000 µg/L and MTBE concentrations up to 37,000 µg/L. Although the release of petroleum hydrocarbons affected groundwater beneath the site, the contaminant plume has stabilized and is not migrating offsite (EnviroApplications, Inc. 2017). Furthermore, biodegradation of the contaminants is occurring, due to the age of the original release, the stable plume, and the absence of liquid-phase hydrocarbons.

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This would continue to reduce the concentration of contaminants in groundwater (EnviroApplications, Inc. 2017). Therefore, the San Diego RWQCB issued a case closure letter in February 2019 determining that no further action related to the petroleum release was required (Gibson 2019).

The current VAP case began in 2010 as a result of possible redevelopment at the site, from automotive and equipment repair to an active above-ground fueling system. There are no current specified plans of redevelopment at the site. The DEH has requested that the City of Escondido authorizes withdrawal from the VAP program to allow the DEH to close ~~out~~ the case (Apecechea 2018).

In the vicinity of the Eastern Public Works Yard site, the Project would involve ground disturbance for installation of a decomposed granite path on the opposite (southern) side of Escondido Creek. No construction would occur on the northern side of the creek adjacent to 475 N. Spruce Street. Because groundwater monitoring data indicates that contaminated groundwater has not migrated from the Eastern Public Works Yard site, and construction would be limited to the opposite side of Escondido Creek, it is anticipated that ground disturbance for the project would not expose construction workers to health risks from the petroleum release. Therefore, the project would have a less than significant impact related to listed hazardous material sites at this site.

1158 E. Washington Avenue – E Z Gas

The release site at 1158 E. Washington Avenue is located at the Ronco Gas station, a parcel nearby the project corridor. Soil and groundwater sampling completed in the vicinity of the gas station indicates that the release of gasoline from four USTs caused soil and groundwater contamination. The USTs were removed on January 20, 1999 and approximately 425 tons of contaminated soil were also removed from the site on June 24, 1999 ~~of that year~~. Initial site assessment activities conducted in 2002 involved sampling of seven direct-push soil borings as well as the installation of three groundwater monitoring wells. Additional groundwater monitoring wells were also installed in 2008 and 2009. The groundwater sampling results indicate contamination with dissolved gasoline, benzene, and MTBE and migration of groundwater contaminants to the south of the release site, in a parcel adjacent to the north of the project corridor (SWRCB 2021). The nearby release case remains active but eligible for closure as of June 4, 2020, under the oversight of the San Diego RWQCB.

Because the groundwater contamination plume does not extend to the project corridor, it is anticipated that ground disturbance for the Project would not expose construction workers to health risks from the nearby petroleum release. Therefore, the project would have a less than significant impact related to listed hazardous material sites at this site.

Aerially Deposited Lead

A paved portion of the trail extends beneath ~~Interstate I-~~15. Aerially deposited lead (ADL) was historically deposited by cars burning leaded gasoline and is often found in the soil adjacent to highways and roads. Therefore, elevated concentrations of ADL may be present along ~~Interstate I-~~15. Considering the results of other unrelated projects assessed for lead in soil along highway corridors, soil within the Caltrans right-of-way (ROW) may contain concentrations of lead exceeding state regulatory thresholds, and any waste generated from the disturbance of soil within the Caltrans ROW in these locations may be regulated as a hazardous waste. Soil disturbance would not occur in the Caltrans ROW. Therefore, construction workers would not be exposed to ADL and

~~impacts would be less than significant. If soil will be disturbed in the Caltrans ROW, potentially significant hazardous material impacts to construction workers and public health could occur.~~

Mitigation Measures

The following mitigation measures are required to address potential contaminated soil and groundwater associated with the adjacent open and closed release cases, ~~aerially deposited lead within the Caltrans ROW,~~ and unanticipated soil or groundwater contamination that may be encountered during construction.

HAZ-1 Soil and Groundwater Management Plan

As a prescriptive safety measure to address the possibility of encountering contaminated soil and prior to ground-disturbing activities at 1718 E. Valley Parkway Station (mile markers 360+00 to 361+00) and for unexpected stained or odiferous soil and/or groundwater encountered during construction along the project corridor, the City shall retain a qualified environmental consultant (PG or PE), to prepare a Soil and Groundwater Management Plan (SGMP). The SGMP shall address:

1. On-site handling and management of impacted soils or other impacted wastes (e.g., stained soil, soil, or groundwater with solvent or chemical odors) if such soils or impacted wastes are encountered, and
2. Specific actions to reduce hazards to construction workers and offsite receptors during the construction phase.

The plan must establish remedial measures and soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the project alignment. These measures and practices shall include, but are not limited to:

- Stockpile management including stormwater pollution prevention and the installation of BMPs
- Proper disposal procedures of contaminated materials
- Monitoring and reporting
- A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection
- The health and safety plan will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

The City shall review and approve the ~~development site Soil and Groundwater Management Plan~~ SGMP for Impacted Soils prior to issuance of grading permit.

HAZ-2 Caltrans Assessments

~~For soil disturbance within the Caltrans ROW, the project applicant shall retain a qualified environmental consultant (PG or PE), to prepare Caltrans required environmental documentation prior to ground-disturbing activities. These documents may include, but are not limited to, an Initial Site Assessment, Preliminary Site Investigation (PSI), and Detailed Site Investigation (DSI). If the PSI and DSI are determined to be required these will be prepared and may include activities such as geophysical surveys, drilling and/or trenching, soil, soil gas, groundwater and/or surface water sampling.~~

Significance After Mitigation

Mitigation Measure HAZ-1 would require preparation and implementation of a SGMP. This plan would establish remedial measures and/or soil and groundwater management practices to protect human health if contaminated soils or groundwater are encountered during construction at 1718 E. Valley Parkway Station 360+00 to 361+00 and if unexpected stained or odiferous soil and/or groundwater encountered during construction along the project corridor. The City would review and approve the SGMP prior to demolition and grading activity. Therefore, implementation of Mitigation Measure HAZ-1 would minimize potential adverse effects on human health from exposure to contaminants from listed hazardous material sites. ~~Implementation of Mitigation Measure HAZ-2 would ensure work conducted within the Caltrans right-of-way remained less than significant. This impact would be less than significant with mitigation incorporated.~~

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The nearest publicly available airports to Escondido are Ramona Airport near the community of Ramona and McClellan—Palomar Airport near Carlsbad. Both airports are approximately 10 miles from the project corridor. Escondido is outside the mapped safety zones for these airports, as documented in their airport land use compatibility plans (San Diego Regional Airport Authority 2011, 2020). Therefore, the project would be located outside the scope of an airport land use plan and more than two miles from the nearest airport, and it would not result in a safety hazard or excessive noise from airport activity. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The proposed trail expansion and renovation project would improve Escondido's circulation system, giving people better multi-modal options to escape from a hazard. It is not anticipated that construction of the project would require temporary street closures, and no streets would be permanently closed or blocked. Therefore, the project would not impair the implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan.

NO IMPACT

- g. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

As shown in Figure VI-6 in the Community Protection Element of the City's General Plan, the project corridor is located in a moderate fire hazard zone to the east of Harmony Grove Road (Escondido 2012a). The remainder of the project corridor to the west of Harmony Grove Road is located in a high fire hazard zone. The California Department of Forestry and Fire Protection's (CAL FIRE's) fire hazard severity map for the City shows that the western tip of the project corridor near Citracado Parkway is in a very high fire hazard severity zone in a local responsibility area (CAL FIRE 2009). However, as discussed in Section 20, *Wildfire*, the project would not introduce structures or land

uses that expose people to substantial risks from wildland fires. Therefore, the project would not result in a significant risk of loss, injury, or death involving wildland fires.

LESS THAN SIGNIFICANT IMPACT

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10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Escondido Creek Trail Expansion and Renovation Project

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

During construction of the proposed trail expansion and renovation, the removal of existing pavement, grading, and vegetation removal would disturb soils in the project corridor. Unless measures are taken to prevent erosion of disturbed soils, rain events could wash loose soil into the adjacent Escondido Creek, causing sedimentation. Stormwater runoff could also carry pollutants like nutrients, heavy metals, pesticides and herbicides, toxic chemicals, oils and fuels, and lubricants into the creek. The entire 26-mile length of Escondido Creek is listed as an impaired waterway under Section 303(d) of the federal Clean Water Act, with respect to the following 12 pollutants (SWQCB 2017):

- Benthic Community Effects
- Bifenthrin
- Dichlorodiphenyltrichloroethane (DDT)
- Indicator Bacteria
- Malathion
- Manganese
- Nitrogen
- Phosphate
- Selenium
- Sulfates
- Total Dissolved Solids
- Toxicity

However, because the project would involve disturbance of soil on more than one acre, it would be subject to erosion control requirements in the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Compliance with the Construction General Permit would limit peak post-project runoff levels to pre-project levels. The City would have to prepare a Storm Water Pollution Prevention Plan (SWPPP), which includes best management practices (BMPs) to control erosion and sediment. Construction BMPs could include silt fencing, fiber rolls, stabilized construction entrances, stockpile management, and solid waste management. The Construction General Permit also requires that construction sites be inspected before and after storm events and every 24 hours during extended storm events (Escondido 2017). The purpose of the inspections is to identify maintenance requirements for the BMPs and to determine the effectiveness of the BMPs that are being implemented. Post-construction stormwater performance standards are also required.

Operation of the project would involve continued recreational use of the creek corridor. It would not introduce new uses that discharge additional water pollutants relative to existing conditions. Except for occasional ongoing trail and landscaping maintenance, motorized vehicles that could discharge oils and fuels would not be used on the trail. Therefore, compliance with existing regulatory requirements would ensure that the project does not violate water quality standards or waste discharge requirements and would not create substantial runoff water or otherwise degrade water quality. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The proposed trail expansion and renovation would use recycled and potable water. Landscaping would be watered with recycled water produced by the City's Hale Avenue Resource Recovery Facility (HARRF). Potable water would be available at four water bottle filling stations on the trail. According to the City's Urban Water Management Plan, potable water in Escondido is sourced from reservoirs at Lake Henshaw, Lake Wohlford, and Lake Dixon, and purchased from the San Diego County Water Authority (SDCWA) (Escondido 2016). Neither recycled nor potable water for the project would be sourced from groundwater. Therefore, the project would not substantially decrease groundwater supplies.

By removing strips of pavement to install decomposed granite paths and landscaped areas, the project would reduce the amount of impervious surface in the project corridor. This would incrementally increase groundwater recharge on-site. The project site is located in the Escondido Groundwater Basin, which is listed as a very low priority basin under the Sustainable Groundwater Management Act (SDCWA 2021). This act requires medium- and high-priority basins to develop sustainability groundwater management plans and manage groundwater for long-term sustainability. Because the Escondido Groundwater Basin is not a medium- or high-priority basin, a sustainable groundwater management plan has not been prepared for the area. Therefore, the project would not interfere with groundwater recharge or impede sustainable groundwater management.

Escondido is under the jurisdiction of the San Diego RWQCB, which is responsible for preparing the Water Quality Control Plan for the region (Basin Plan). The Basin Plan designates beneficial uses of water in the region and establishes narrative and numerical water quality objectives. The State has developed total maximum daily loads (TMDLs), which are a calculation of the maximum amount of a pollutant that a water body can have and still meet water quality objectives established by the region. As discussed under item 10a, the project would disturb at least one acre and therefore would be required to comply with the Construction General Permit, which would minimize and avoid water quality impacts associated with soil erosion and stormwater runoff from the project site. The project would not violate water quality objectives for beneficial uses in the vicinity of the project site or exceed TMDLs. Therefore, it would not conflict with a water quality control plan. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(i) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*
- c.(ii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

Escondido Creek Trail Expansion and Renovation Project

- c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The project would be located in a flood control right-of-way that is partially paved with a multi-use trail. To install proposed meandering decomposed granite paths next to the existing trail, the project would involve removal of existing asphalt strips. This would incrementally reduce the amount of impervious surface in the project corridor. Although the project would involve ground disturbance during construction, compliance with erosion control BMPs under the NPDES General Construction Permit would prevent increases in off-site runoff, as discussed in Item 10a. The proposed trail expansion and renovation also would be adjacent to the channel of Escondido Creek but would not alter the course of the creek itself. No bridges or stream crossings are currently proposed. Therefore, the project would not substantially alter existing drainage patterns of the course of a stream or river. The impact related to drainage patterns would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*
- d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

Escondido Creek is channelized to quickly convey stormwater flows through the city, minimizing flooding of surrounding areas. However, Figure VI-7 in the Community Protection Element of the City's General Plan shows that portions of Escondido Creek Trail between N. Ash Street and N. Midway Drive are located in a 100-year floodplain mapped by the Federal Emergency Management Agency (FEMA) (Escondido 2012a). As discussed above, the proposed trail expansion and renovation would incrementally reduce existing impervious surfaces, removing asphalt strips to install pervious decomposed granite paths next to the trail. The project also would not alter the course of Escondido Creek. Therefore, the project would not impede or redirect flood flows.

The project corridor is not subject to tsunami hazards because it is located at least 11 miles inland and elevated more than 600 feet above sea level. The nearest large inland bodies of water to the project corridor are Lake Dixon and Lake Wohlford, which are located at least 1.3 miles away. As shown in Figure VI-8 in the Community Protection Element of the City's General Plan, the entire project corridor is located in dam failure inundation areas associated with these lakes. If a dam fails at either lake, the City expects that the project corridor would be inundated. While part of the project corridor is in a 100-year floodplain, and the entire corridor is in a dam failure inundation area, operation of the trail would not involve the substantial use of pollutants that could be released during inundation. Therefore, the project would not risk the release of pollutants during inundation. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project physically divide an established community?

The purpose of the proposed trail expansion and renovation is to increase connectivity in Escondido by improving bicycle and pedestrian access. This would give residents better access to destinations without the need for motorized transportation. No new roads or other large or linear facilities that would physically divide existing neighborhoods would be constructed. Therefore, the project would not divide an established community, but rather would enhance its connectivity. No impact would occur.

NO IMPACT

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

The proposed trail expansion and renovation would implement planned improvements in the City's General Plan and Escondido Creek Trail Master Plan, which are intended to reduce environmental impacts. The Land Use and Community Form Element of the General Plan describes the effort to revitalize the Escondido Creek Trail as follows:

Revitalizing Escondido Creek as 6+ mile 'Urban Linear Park' through the entire community facilitates the General Plan's Core Themes. The path links residential neighborhoods to shopping, healthy recreation, education and employment opportunities. The Creek's improvement will expand the community's opportunities for live, work and play, and serve as a tool for revitalizing neighborhoods and shopping areas. The creek path serves as a convenient and centralized alternative transportation route and reduces reliance on the automobile thus conserving and sustaining resources. (Escondido 2012a)

Consistent with this intention in the General Plan, the project would expand trail access west of Harmony Grove Road and add recreational opportunities such as decomposed granite paths and fitness stations along the existing trail. Enhancing the trail would make it a more attractive alternative to driving, reducing reliance on the automobile in Escondido.

Escondido Creek Trail Expansion and Renovation Project

The City adopted the Escondido Creek Trail Master Plan in 2012 to reimagine the creek as a recreational and environmental asset for the city (Escondido 2012b). This plan proposes a number of trail improvements that the project would implement: expanding the trail, adding decomposed granite paths alongside the existing asphalt path installing lighting for pedestrian safety, and landscaping with native plants. The proposed trail design also would adhere to design guidelines in Chapter 4 of the Trail Master Plan. For example, the City would remove a strip of asphalt from the existing trail and replace it with decomposed granite paths, which would meander where grades and right-of-way width allow. By implementing the Trail Master Plan, the project would contribute to its goal of providing commuting alternatives to Escondido residents. Therefore, the project would have a less than significant impact related to conflicts with land use plans, policies, and regulations adopted to reduce environmental impacts.

LESS THAN SIGNIFICANT IMPACT

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b. *Would the project 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?*

The City’s General Plan does not identify the presence of mineral resource deposits or active extraction operations in Escondido (Escondido 2012a). The project corridor also is zoned for flood control use and not available for mineral resource recovery (Escondido 2019). Therefore, the project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. No impact would occur.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Overview of Noise Measurement

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs (e.g., the human ear). Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013a).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler, et. al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or

decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Crocker 2007).

The impact of noise is not a function of sound level alone. The time of day when noise occurs and the duration of the noise are also important. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level (L_{eq}); it considers both duration and sound power level. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, L_{eq} is summed over a one-hour period.

Overview of Vibration Measurement

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body is from a low of less than 1 Hz up to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise may result in adverse effects, such as building damage, when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz). The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. Particle velocity is the velocity at which the ground moves. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the greatest magnitude of particle velocity associated with a vibration event.

Noise-Sensitive Receptors

The Community Protection Element of the General Plan identifies the following land uses as sensitive to noise: residential development and care facilities, schools, churches, transient lodging, hospitals and health care facilities, libraries, museums, cultural facilities, golf courses, and passive recreational facilities (Escondido 2012a). A wide range of noise-sensitive receptors are located near the 4.5-mile project corridor. These include single-family residences, multi-family residences, and mobile home parks adjacent to the project corridor, among other land uses.

Existing Noise Conditions and Sources

To establish existing ambient noise conditions in the vicinity of the project corridor, short-term noise level readings were taken by Rincon Consultants, Inc. staff at four locations using an ANSI Type II integrating sound level meter in accordance with industry standard protocols on February 11, 2021. These noise measurements were collected on a weekday, during the daytime outside peak traffic hours. This time period is typically representative of the lowest average ambient noise levels

in the area during daytime hours. As shown in Figure 13, the measurements were taken in the following locations: on the trail corridor between Citracado Parkway and Harmony Grove Road, at the edge of N. Broadway next to Grape Day Park and the trail corridor, on N. Cedar Street next to the trail corridor, and at N. Rose Street next to Washington Park and the trail corridor. These locations are representative of the ambient noise environment in and near the trail corridor.

Table 5 lists the noise measurement locations and measured noise levels.

Table 5 Noise Measurement Results

No.	Measurement Location ¹	Primary Noise Source	Sample Time	Result (L _{eq} dBA) ²
ST1	Trail corridor from Citracado Pkwy. to Harmony Grove Rd.	Birds, industrial hum	9:22 – 9:40 AM ³	43.0
ST2	N. Broadway next to Grape Day Park and trail corridor (50 feet from centerline of roadway)	Traffic on N. Broadway	9:55 – 10:10 AM	60.6
ST3	N. Cedar St. next to trail corridor (50 feet from centerline)	Traffic on E. Valley Pkwy.	10:35 – 10:50 AM	49.4
ST4	N. Rose St. next to Washington Park and trail corridor (40 feet from centerline)	Traffic on N. Rose St.	11:03 – 11:18 AM	64.1

¹ Measurement locations are shown in Figure 13.

² All measurements were taken on February 11, 2021, using an ANSI Type II sound level meter.

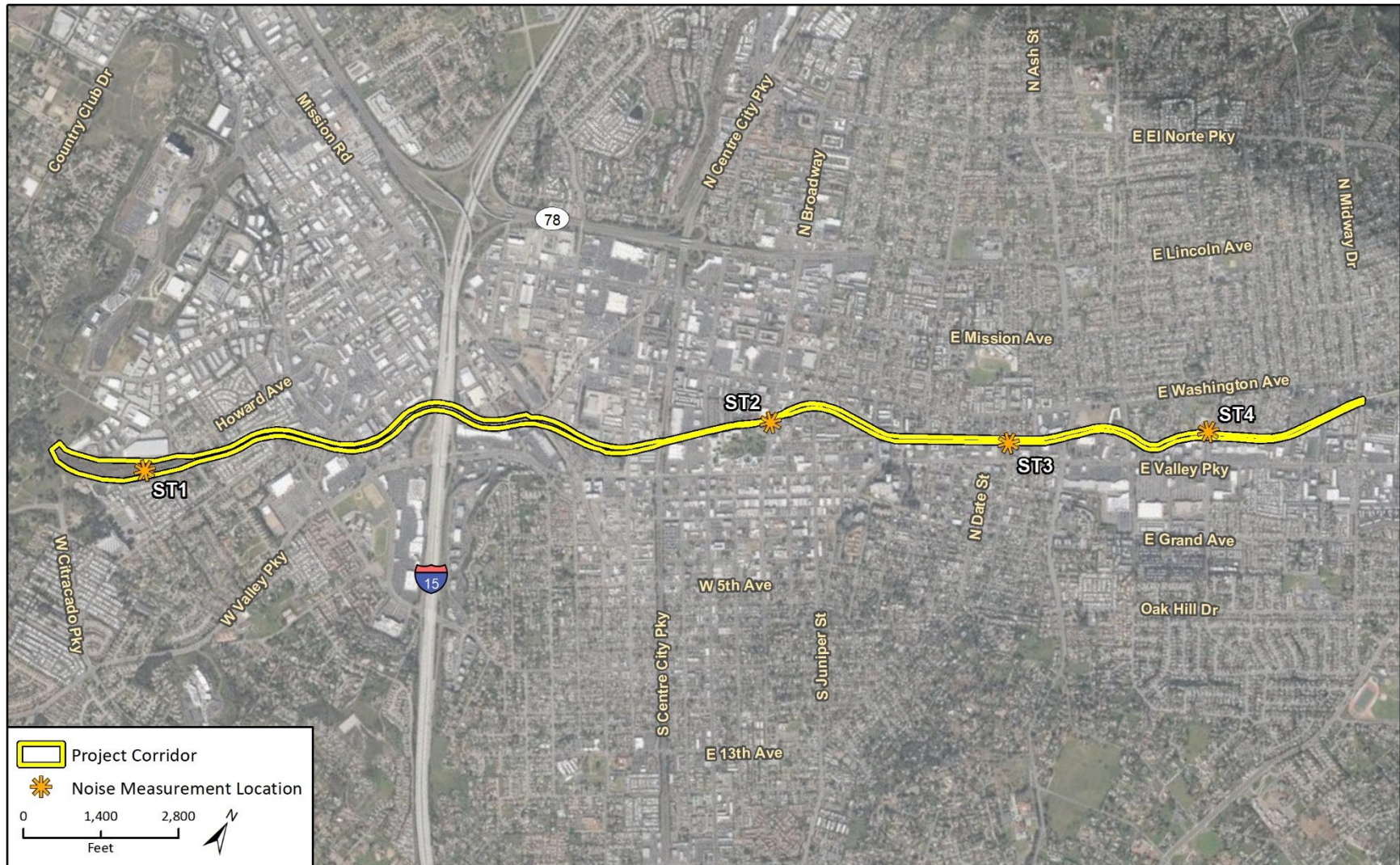
³ The sample time for ST1 was extended to 18 minutes because sound recording was paused to skip unusual sounds that could skew the equivalent noise level (e.g., aircraft flyovers, sirens).

Refer to Appendix C for noise measurement results.

As shown in Table 5, the primary noise source along most of the project corridor is motor vehicle traffic. Ambient noise levels are higher near major roadways that cross the project corridor. For example, ambient noise was measured at 64.1 dBA L_{eq} on the side of N. Rose Street next to Washington Park and 60.6 dBA L_{eq} on the side of N. Broadway next to Grape Day Park. By contrast, ambient noise was measured at only 49.4 dBA L_{eq} on N. Cedar Street next to the southern edge of the trail corridor, which is approximately 350 feet from the nearest arterial roadway (E. Valley Parkway). Near the western terminus of the trail corridor, the primary noise sources were observed to be birds and a minor hum from industrial sources located approximately 500 feet away. In this segment of the project corridor, which is the farthest from major roadways, ambient noise was measured at 43.0 dBA L_{eq}.

Measured noise levels from traffic may be quieter than usual because of lower traffic volumes during the protracted coronavirus pandemic. Therefore, typical ambient noise levels may exceed the measured noise levels shown in Table 5. Nonetheless, the noise measurements provide a conservative baseline for comparison to construction noise generated by the project. Therefore, they are appropriate for establishing baseline conditions against which to compare noise impacts.

Figure 13 Noise Measurement Locations



Regulatory Setting

Federal

The *Transit Noise and Vibration Impact Assessment Manual* published by the Federal Transit Administration (FTA) provides guidelines for significant vibration impacts at sensitive receptors (FTA 2018). The FTA’s thresholds for vibration annoyance are 65 VdB for buildings where low ambient vibration is essential for interior operations (such as hospitals and recording studios), 72 VdB for residences and buildings where people normally sleep, including hotels, and 75 VdB for institutional land uses with primary daytime use (such as churches and schools). These thresholds apply to “frequent events,” which the FTA defines as vibration events occurring more than 70 times per day. The thresholds for frequent events are considered appropriate because it is assumed that bulldozers would be used during grading and that they could make more than 70 discrete movements per day when moving earth.

In addition, the FTA manual provides guidelines for potential structural damage from vibration. These thresholds are expressed in terms of both maximum inches per second (in/sec) of peak particle velocity (PPV) and VdB as shown in Table 6.

Table 6 Thresholds for Building Damage from Construction Vibration

Building Category	Maximum PPV (in/sec)	Approximate L _v
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Notes: in/sec = inches per second; PPV = peak particle velocity
¹ Magnitude of vibration is expressed in decibel notation (VdB), in terms of “root-mean-square” amplitude referenced to 1 micro-inch per second.
 Source: FTA 2018

Local

ESCONDIDO GENERAL PLAN

Figure VI-13 in the Community Protection Element of the General Plan includes the following standards for projects that could significantly alter existing noise levels:

Noise impacts of proposed projects on existing land uses should be evaluated in terms of potential for adverse community response based on a significant increase in existing noise levels. For example, if an area is currently below the maximum normally acceptable noise level, an increase in noise up to the maximum allowable level should not necessarily be allowed. Projects increasing noise levels by 5 dB or greater should be considered as generating a significant impact and should require mitigation.

Table 7 summarizes the standards for increases in exterior noise at noise-sensitive uses.

Table 7 City Standards for Increases in Exterior Noise at Noise-Sensitive Uses

Residences and Buildings Where People Normally Sleep ¹		Institutional Land Uses with Primary Daytime and Evening Uses ²	
Existing L_{dn}	Allowable Noise Increment	Existing Peak Hour L_{eq}	Allowable Noise Increment
50	5	50	9
55	3	55	6
60	2	60	5
65	1	65	3
70	1	70	3
75	0	75	1
80	0	80	0

Notes: noise levels are measured at the property line of the noise-sensitive use.

¹ This category includes homes, hospitals, and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.

² This category includes schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material.

Source: Escondido 2012a

Several policies in the Community Protection Element would apply to the project:

Noise Policy 5.5

Require construction projects and new development to ensure acceptable vibration levels at nearby noise-sensitive uses based on Federal Transit Administrator criteria.

Noise Policy 5.6

Require the preparation of noise studies, as deemed necessary by the Planning Department, to analyze potential noise impacts associated with new development which could significantly alter existing noise levels in accordance with provisions outlined in Figure VI-14 [Table 7 of this IS-MND].

Noise Policy 5.10

Require development projects that are subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.

ESCONDIDO MUNICIPAL CODE

In Chapter 17, Article 12 of the Escondido Municipal Code, the Noise Ordinance sets standards to minimize noise generated on properties in the city. Table 8 shows the allowable noise levels at any point on or beyond the boundaries of the property on which the sound is produced, as well as corresponding times of day for the zoning district of receiving land uses. These noise standards typically apply to stationary sources such as noise from mechanical equipment or event noise, as opposed to traffic noise. Environmental noise is measured by the L_{eq} for the hours specified in Table 8. If the noise is continuous, the L_{eq} for any hour will be represented by any lesser period within that hour. If the noise is intermittent, the L_{eq} for any hour may be represented by a time period typical of the operating cycle, but the measurement period must be 15 minutes or longer. If the measured ambient level exceeds the permissible noise level, the allowable noise exposure standard is the ambient noise level.

Table 8 City of Escondido Exterior Sound Limit Levels

Zone	Time	One-Hour Sound Level Limit (dBA L _{eq})
Residential zones	7 AM to 10 PM	50
	10 PM to 7 AM	45
Multi-residential zones	7 AM to 10 PM	55
	10 PM to 7 AM	50
Commercial zones	7 AM to 10 PM	60
	10 PM to 7 AM	55
Light industrial/industrial park zones	Anytime	70
General industrial zones	Anytime	75

Source: Escondido 2020

Sections 17-234 and 17-238 of the City’s Noise Ordinance establish regulations for construction equipment and grading activities. Section 17-234 states that except for emergency work, the following applies to all construction equipment operating in the City:

- a. It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site, except on Monday through Friday during a week between the hours of 7:00 a.m. and 6:00 p.m. and on Saturdays between the hours of 9:00 a.m. and 5:00 p.m., and provided that the operation of such construction equipment complies with the requirements of subsection (c) of this section.
- b. It shall be unlawful for any person, including the City of Escondido, to operate construction equipment at any construction site on Sundays and on days designated by the president, governor, or City Council as public holidays.
- c. No construction equipment or combination of equipment, regardless of age or date of acquisition, shall be operated so as to cause noise in excess of a one-hour average sound level limit of 75 dB at any time, unless a variance has been obtained in advance from the City Manager.

Section 17-238 states:

- a. It shall be unlawful for any person, including the City of Escondido, to do any authorized grading at any construction site, except on Mondays through Fridays during a week between the hours of 7:00 a.m. and 6:00 p.m. and, provided a variance has been obtained in advance from the City Manager, on Saturdays from 10:00 a.m. to 5:00 p.m.
- b. For the purpose of this section, “grading” shall include, but not be limited to, compacting, drilling, rock crushing or splitting, bulldozing, clearing, dredging, digging, filling and blasting.
- c. In addition, any equipment used for grading shall not be operated so as to cause noise in excess of a one-hour sound level limit of 75 dB at any time when measured at or within the property lines of any property which is developed and used in whole or in part for residential purposes, unless a variance has been obtained in advance from the City Manager.

Escondido Creek Trail Expansion and Renovation Project

- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

This analysis covers temporary increases in ambient noise from construction activity and permanent increases from noise generated during the operation of the project.

Construction Noise

Construction of the active transportation projects listed in the project would generate elevated noise levels on a temporary basis in the immediate vicinity of project sites. As shown in Table 9, average noise levels associated with using heavy equipment at construction sites can range from approximately 76 to 88 dBA at 50 feet from the source, depending upon the types of equipment in operation at any given time and the phase of construction. The highest noise levels generally occur during excavation and grading, which involve using such equipment as backhoes, bulldozers, shovels, and front-end loaders. Although many active transportation projects would simply require restriping and signage, some projects would require heavy equipment for demolition and grading. For example, crosswalk enhancements could involve jackhammering of existing pavement and concrete to extend curbs, upgrade curb ramps, and install pedestrian beacons.

Table 9 Typical Construction Noise Levels

Equipment	25 feet from Source (dBA L_{eq})	50 feet from Source (dBA L_{eq})	100 feet from Source (dBA L_{eq})	200 feet from Source (dBA L_{eq})	500 feet from Source (dBA L_{eq})
Air Compressor	86	80	74	68	60
Backhoe	86	80	74	68	60
Concrete Mixer	91	85	79	73	65
Grader	91	85	79	73	65
Jack Hammer	94	88	82	76	68
Paver	91	85	79	73	65
Roller	91	85	79	73	65
Saw	82	76	70	64	56
Scraper	91	85	79	73	65
Truck	90	84	78	72	64

Note: pile drivers will not be used for active transportation projects.

Source: Noise level at 50 feet from Federal Transit Administration, 2018. Noise levels at 25 feet, 100 feet, 200 feet, and 500 feet were extrapolated using a 6 dBA attenuation rate per doubling of distance. Each noise level assumes the piece of equipment is operating at full power for the expected duration to complete the construction activity. The duration varies widely between each piece of equipment. Noise levels also depend on the model and year of the equipment used.

Noise levels from point sources such as equipment at construction sites typically attenuate at a rate of 6 dBA per doubling of distance. Therefore, only areas within several hundred feet of construction sites would typically be exposed to perceptible construction noise levels. As noted above, the Escondido Municipal Code does not establish numeric standards for construction noise. However, construction noise that substantially exceeds existing ambient noise levels could disturb sensitive receptors, such as residences and schools.

Construction activity under the Plan would be required to comply with Policy 12-P-9 in the City’s Noise Element, which would “limit generation of loud noises on construction sites adjacent to existing development to normal business hours between 8:00 AM and 5:00 PM.” This policy would

prevent loud construction activity during evening and nighttime hours when nearby residences are most sensitive to noise. However, as discussed above, daytime construction noise could still disturb sensitive receptors. Therefore, the construction of active transportation projects could have a potentially significant impact on sensitive receptors from temporary increases in ambient noise levels.

Mitigation Measures

In addition to requirements for construction noise in the City's Noise Element and Municipal Code, the following mitigation measures are required to reduce the exposure of sensitive receptors to construction noise:

N-1 Noise Reduction Measures Near Sensitive Receptors

The following development standard shall be added to the proposed Plan:

"The City shall ensure that, where residences, schools, or other noise-sensitive uses are located within 500 feet of construction sites for active transportation projects listed in the Plan, appropriate measures shall be implemented to reduce noise exposure to the extent feasible. Specific techniques may include, but are not limited to:

- Locating stationary noise-generating construction equipment as far from sensitive receptors as feasible.
- Installing temporary noise barriers to block and deflect noise."

N-2 Noise Control Equipment

The following development standard shall be added to the proposed Plan:

"The City shall ensure that equipment and trucks used for construction of active transportation projects listed in the Plan utilize the best available noise control techniques (including mufflers, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds)."

N-3 Impact Equipment

The following development standard shall be added to the proposed Plan:

"The City shall ensure that impact equipment (e.g., jack hammers, pavement breakers, and rock drills) used for construction of active transportation projects listed in the Plan be hydraulically or electrically powered wherever feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatically powered tools is unavoidable, use of an exhaust muffler on the compressed air exhaust can lower noise levels from the exhaust by up to about 10 dBA. When feasible, external jackets on the impact equipment can achieve a reduction of 5 dBA. Whenever feasible, use quieter procedures, such as drilling rather than impact equipment operation."

With implementation of local noise control requirements and proposed mitigation, temporary construction noise would be reduced to the extent feasible. Therefore, this impact would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Operational Noise

Current noise sources on the Escondido Creek Trail include human conversations, maintenance equipment, and non-motorized vehicles. These are temporary, intermittent sources of noise that do not substantially contribute to ambient noise levels in the project corridor. After construction of the project, these noise sources would continue to occur on the Escondido Creek Trail. With the proposed trail expansion west of Harmony Grove Road, they would also occur in this new trail segment. However, trail noise would not substantially increase existing ambient noise levels from birds and industrial operations to the west of Harmony Grove Road. The project also would encourage residents to substitute bicyclist and pedestrian trips for motor vehicle trips, which would incrementally reduce traffic noise. Therefore, the impact from permanent increases in noise would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

The use of heavy construction equipment can generate substantial vibration near the source. It is expected that construction of some proposed active transportation projects would generate temporary vibration from jackhammering to break up existing pavement, bulldozers for earthmoving, trucks loaded with construction materials, and vibratory rollers to even out the surface of new asphalt.

Similar to construction noise, vibration levels would vary depending on the type of construction project and related equipment use. In general, the construction of bicycle facilities projects would be unlikely to generate substantial vibration. Table 10 estimates vibration levels from equipment that may be used during construction of the proposed facilities.

Table 10 Vibration Levels for Construction Equipment

Equipment	PPV (in/sec)		
	25 Feet	50 Feet	100 Feet
Vibratory Roller	0.210	0.098	0.046
Large Bulldozer	0.089	0.042	0.019
Loaded Trucks	0.076	0.035	0.017
Jackhammer	0.035	0.016	0.008

Source: Caltrans 2013b

As shown in Table 10, construction activity would generate vibration levels reaching an estimated 0.098 PPV at a distance of 50 feet, during paving of new bicycle facilities. Because this vibration level would not exceed 0.25 PPV, Caltrans' recommended criterion for distinctly perceptible vibration from transient sources, it would not result in substantial annoyance to people of normal sensitivity. Construction activity that generates loud noises (and therefore vibration) also would be limited to normal business hours, which would prevent the exposure of sensitive receptors to vibration during evening and nighttime hours. Furthermore, maximum vibration levels would not exceed the Caltrans criteria of 0.5 PPV for potential damage of historic and old buildings from transient vibration sources. Even if construction activity generated vibration as close as 25 feet from sensitive receptors, vibration levels reaching 0.21 PPV (as shown in Table 10) still would not exceed applicable

Caltrans criteria for human annoyance and structural damage. Therefore, vibration would not be excessive, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

As discussed in Section 9, *Hazards and Hazardous Materials*, the nearest publicly available airports to Escondido are Ramona Airport near the community of Ramona and McClellan—Palomar Airport near Carlsbad. Both airports are approximately 10 miles from the project corridor. Escondido is outside the mapped noise contours for these airports, as documented in their airport land use compatibility plans (San Diego Regional Airport Authority 2011, 2020). No private airstrips are located in the vicinity of Escondido. Therefore, the project would not expose trail users to excessive noise levels from aircraft. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Induce substantial unplanned 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*
- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project would not involve the construction of infrastructure that could induce substantial population growth, such as new or increased capacity sewer or water lines, or the construction or extension of streets and roads. The proposed extension of the Escondido Creek Trail, as well as improvements to the existing trail, would serve existing residents in the Escondido area. This extension of the trail would not expand the capacity of the motor vehicle system and therefore would not induce population growth. In addition, because the project would be located in an existing flood control channel, it would not require displacement of housing or people. No impact related to population and housing would occur.

NO IMPACT

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15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

1	Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a.1. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

a.2. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

In almost 4.2 miles of the 4.5-mile project corridor, between Harmony Grove Road and N. Midway Drive, the project would maintain existing public access to the Escondido Creek Trail. Expanded police and fire protection service would not be necessary to serve the proposed trail renovations in this area, including unpaved foot paths, landscaping, and outdoor fitness equipment. To the west of Harmony Grove Road, the project would extend the trail approximately 0.3 mile toward Citracado Parkway. Currently, this segment is a paved flood control maintenance road with a locked gate at Harmony Grove Road. The project would open the segment to recreational access, requiring additional police and fire service. However, the trail extension would amount to a less than 10 percent increase in the length of trail requiring service. Furthermore, the project would not add

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residential, commercial, or other structural development that could substantially increase demand for police or fire protection services. As a result, the project would not exceed thresholds in Chapter 33, Article 47 of the Escondido Municipal Code for additional residential units in areas where response times for police, fire, and emergency service are unacceptable (Escondido 2020). Therefore, the project would have a less than significant impact related to police and fire protection facilities.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

The project would renovate and expand an existing trail facility. It would not add residences or places of employment that would increase the population of school-age children in Escondido. Because the project would not increase demand for school facilities, no impact would occur.

NO IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

The project would renovate segments of the Escondido Creek Trail that provide non-motorized access to Grape Day Park and Washington Park, adding meandering foot paths, landscaping, and outdoor fitness equipment. These proposed renovations to an existing access route would not substantially affect the level of public use at nearby parks. The project also would not add residences or places of employment that would increase the service population for park facilities in Escondido. Therefore, the project would not result in the need for new or physically altered parks.

Although the project would not add or expand parkland, the proposed foot paths, landscaping, and fitness equipment would serve as recreational facilities for Escondido residents. As discussed in Section 16, *Recreation*, the environmental effects of constructing the proposed recreational facilities are one component of the overall proposed project, and as such, are part of the whole of the action that is analyzed in this IS-MND, and there would be no additional impacts.

LESS THAN SIGNIFICANT IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

As discussed in Section 14, *Population*, the project would not cause an increase in Escondido's population. Therefore, it would not increase demand for libraries or other governmental facilities. No impact would occur.

NO IMPACT

16 Recreation

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

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

As discussed in Section 15, *Public Services*, the project would renovate segments of the Escondido Creek Trail that provide non-motorized access to Grape Day Park and Washington Park. Proposed renovations including meandering foot paths, landscaping, and outdoor fitness equipment would increase the trail’s attractiveness to Escondido residents. However, it is not anticipated that the project would cause an increase in trail use to the extent that would substantially alter public use of neighborhood parks. The project would not involve construction of residential units or other development that increases the service population for local parks. In addition, the project would add recreational resources to the Escondido Creek Trail, helping to meet citywide demand without overwhelming existing parks. Therefore, it would not significantly accelerate or cause the physical deterioration of existing parks, requiring repair or expansion. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project would involve the expansion and renovation of the Escondido Creek Trail, a recreational facility. As discussed above, proposed trail features would add recreational resources such as foot paths and fitness equipment.

As discussed in Section 4, *Biological Resources*, impacts to special-status species, nesting birds, and wetlands and riparian communities during construction would be potentially significant. Section 5, *Cultural Resources*, notes that impacts to archaeological resources from ground disturbance could be significant. As discussed in Section 7, *Geology and Soils*, new bicycle paths on undisturbed soil could be subject to unstable conditions from expansive soils. Section 9, *Hazards and Hazardous Materials* also indicates that soil disturbance could expose people to hazardous contaminants. Section 18, *Tribal Cultural Resources*, notes that impacts to Native American resources from ground

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disturbance could be significant. Although the project would not add or expand parkland, the proposed foot paths, landscaping, and fitness equipment would serve as recreational facilities for Escondido residents.

The environmental effects of constructing the proposed recreational facilities are one component of the overall proposed project, and as such, are part of the whole of the action that is analyzed in this IS-MND, and there would be no additional impacts.

LESS THAN SIGNIFICANT IMPACT

17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities (or conflict with applicable traffic thresholds specified in City of Escondido Zoning Code Article 47)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities (or conflict with applicable traffic thresholds specified in City of Escondido Zoning Code Article 47)?*
- b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Transit Facilities

The Escondido Creek Trail connects to train and bus service at the Escondido Transit Center and to bus routes on intersecting roadways. By adding amenities such as outdoor fitness stations, bike racks, lighting, and landscaping, the project would encourage increased use of the trail as a multi-modal access route to transit. Proposed trail improvements near transit would be consistent with Transit System Policy 5.7 in the City’s General Plan to “provide connections to transit stations by identifying roadway, bikeway, and pedestrian way improvements to be constructed within ½ mile of every major transit station” (Escondido 2012a). As discussed in Section 14, *Population and Housing*, the project would not increase Escondido’s population, so it would have no effect on the capacity of transit facilities to accommodate public demand. Therefore, the project would not conflict with policies in the Mobility and Infrastructure Element of the City’s General Plan to improve transit access.

Roadway Facilities

Between Citracado Parkway and N. Midway Drive, the Escondido Creek Trail has at-grade crossings with the following roadways: N. Quince Street, Centre City Parkway, N. Escondido Boulevard, N. Broadway, N. Juniper Street, N. Hickory Street, N. Fig Street, Harding Street, N. Rose Street, and N. Midway Drive. The proposed trail expansion and renovation would encourage greater trail use, which could incrementally increase the volume of trail users crossing roadways. However, an increase in crossing activity would not increase traffic delay: most roadway crossings in the project corridor lack crosswalks, and motor vehicles are not required to yield to trail users. Therefore, the project would not conflict with General Plan policies for efficient roadway circulation and would not cause roadways to exceed traffic delay thresholds in Article 47 of the City of Escondido Zoning Code (Escondido 2020). Regardless, pursuant to CEQA Guidelines section 15064.3, a project's effect on traffic delay cannot be considered a significant environmental impact.

The Governor's Office of Planning and Research (OPR) finds that "active transportation projects generally reduce VMT [vehicle miles traveled] and therefore are presumed to cause a less-than-significant impact on transportation" (OPR 2018). By extending and renovating an active transportation route, the project would encourage residents to substitute multi-modal trips for motor vehicle trips, which would reduce VMT. Therefore, the project would be consistent with statewide policy to reduce vehicle miles traveled under CEQA Guidelines section 15064.3, subdivision (b).

Bicycle Facilities

The project would improve safety and access for bicyclists on the Escondido Creek Trail. Proposed decomposed granite paths in the project corridor would let pedestrians use a physically separated route from the paved bike lanes. This would reduce the risk of collisions between bicyclists and pedestrians. Bike racks would be added at multiple points in the project corridor – at four new outdoor fitness stations, near N. Date Street, and at Washington Park – which would allow safe storage of bicycles at activity areas along the trail. The proposed trail extension also would provide bicycle access from Citracado Parkway to Harmony Grove Road. This would implement a planned extension of the trail as shown in Figure ES 1 of the City's Bicycle Facilities Master Plan (Escondido 2012c). These proposed trail facilities would be consistent with General Plan policies to enhance existing bicycle routes and facilities and to add bicycle parking in public places (Escondido 2012a). Therefore, the project would not conflict with applicable policies for bicycle facilities.

Pedestrian Facilities

As discussed above, the proposed decomposed granite paths would let pedestrians use a physically separated route from the paved Escondido Creek Trail. This would reduce the risk of collisions with bicyclists, improving pedestrian safety. The project also would add a number of trail amenities serving pedestrians, such as outdoor fitness areas, landscaping, and lighting for nighttime safety. These features would be consistent with Pedestrian Network Policy 3.4 to "preserve and enhance pedestrian connectivity within existing neighborhoods via the Escondido Creek trail" (Escondido 2012a). Therefore, the project would not conflict with policies related to pedestrian facilities.

Escondido Zoning Code Article 47 and Vehicle Miles Traveled (VMT)

Under Escondido Zone Code Article 47, unless otherwise exempt from state law, development proposals or other discretionary planning actions which are expected to generate either an

equivalent of two thousand four hundred (2,400) or more average daily trips (ADT) or two hundred (200) or more peak hour vehicle trips shall include as part of the enhanced CEQA review, a traffic analysis which includes the criteria set forth in Article 47. Although the proposed project may induce some new vehicle trips associated with people travelling to the trail for recreational purposes, pedestrian and bicycle facilities do not require analysis of induced VMT because they are unlikely to lead to a substantial or measureable increase in vehicle travel (OPR 2018). Therefore, travel to and from the Trail would not generate substantial VMT. Additionally, it is reasonable to assume that some users would forego traveling to another trail or outdoor space in favor of the proposed trail. Thus, compared to existing VMT in the region and project area, the proposed project would result in no substantial increases. Accordingly, consistent with Section 15064.3 of the CEQA Guidelines, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

The project would not add sharp curves, new intersections, or incompatible uses on the Escondido Creek Trail. By adding lighting, the project would improve visibility and reduce potential hazards for trail users. Therefore, no impact related to roadway hazards would occur.

NO IMPACT

- d. *Would the project result in inadequate emergency access?*

The Escondido Creek Trail is located on paved maintenance roads along a flood control channel. Trail entrances at roadway crossings are gated, preventing access when the trail is closed; however, trail entrances are accessible to emergency vehicles when the trail is open to public use. The project would not impede existing emergency access to the trail corridor. As discussed above, the project also would not substantially increase traffic delay on intersecting roadways. Therefore, it would not cause delays in emergency access on roadways. The impact on emergency access would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a., b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is (a) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or (b) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1?

There are 455 previously recorded cultural resources within 0.5-mile of the project site. Of these, there are 423 historic-period resources consisting of 418 buildings (predominantly residential), four refuse scatters, one road, one park, and one well. However, the cultural resources memorandum identified no historical resources within or adjacent to the project site. Therefore, no impact to historical resources would occur because of the proposed project.

Tribal cultural resources are defined in PRC 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either:

- Included or determined to be eligible for the California Register of Historical Resources
- Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1

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As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, “tribal cultural resources.” AB 52 establishes that “A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (Public Resources Code Section 21084.2). AB 52 further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (Public Resources Code Section 21084.3).

AB 52 establishes a formal project consultation process for California Native American tribes and lead agencies regarding tribal cultural resources, referred to as government-to-government consultation. Per Public Resources Code Section 21080.3.1(b), the AB52 consultation process must begin prior to release of a negative declaration, mitigated negative declaration, or environmental impact report. Native American tribes to be included in the formal consultation process are those that have requested notice of projects proposed within the jurisdiction of the lead agency. AB 52 provides dedicated timeframes for inquires and responses regarding consultation and information sharing. AB 52 also provides for confidential information sharing between the governments involved for a meaningful consultation process.

Pursuant to AB 52, Native American tribes have 30 days to respond and request formal consultation. On June 1, 2021, the City of Escondido distributed AB 52 consultation letters for the proposed project; including project information, map, and contact information to each of the five (5) Native American tribes previously requesting to consult on City of Escondido projects. The tribal governments that were provided an AB 52 consultation letter include the following:

- Mesa Grande Band of Mission Indians
- Rincon Band of Luiseño Indians
- San Luis Rey Band of Mission Indians
- San Pasqual Band of Mission Indians
- Soboba Band of Luiseño Indians

On June 11, 2021 San Pasqual Band of Mission Indians responded to the AB 52 consultation letter, requesting government-to-government consultation under Section 106 of the NHPA. In addition, San Pasqual Band of Mission Indians has requested access to any cultural resource reports generated under the environmental review processes. In addition to the San Pasqual Band of Mission Indians, the Rincon Band of Luiseño Indians met with the City on September 22, 2021 and the San Luis Rey Band of Mission Indians met with the City on October 6, 2021. The San Pasqual Band of Mission Indians consulted with the City through February 2022. The Rincon Band of Luiseño Indians sent a letter to the City on November 1, 2021 agreeing with the measures proposed by Rincon Consultants, Inc. Cultural Resources Assessment (Appendix B) and requested to be notified of any changes to project plans. The San Luis Rey Band of Mission Indians notified staff on February 14, 2022 that they have concluded consultation.

Ground disturbance associated with the proposed project has the potential to unearth previously unknown cultural resources of Native American origin that could be considered tribal cultural resources. A search of the NAHC’s SLF returned a positive result and a pedestrian field survey resulted in updating the record of one previously recorded resource, P-37-12209/H, a multicomponent archaeological site consisting of prehistoric Native American habitation elements, an historic-period reservoir, and two historic-period residences. The background research concluded the recorded boundary of resource P-37-12209/H extends into the project corridor. An

archaeological survey of the project site confirmed the presence of P-37-12209/H adjacent to the western terminus of the project site, but did not identify any components within the project site and no other resources were identified. The project has been specifically designed to avoid resource P-37-12209/H.

Project-related work in the vicinity of Citracado Parkway will not involve ground disturbance and will be limited to sealing and striping the existing paved roadway; no impacts to resource P-37-12209/H will occur. However, given the presence of 30 resources of Native American origin and two multicomponent archaeological sites that include prehistoric components within 0.5-mile of the project corridor, the project site should be considered sensitive for archaeological resources and there is potential for Native American resources or human remains to be present in the project area. With project adherence to the standard permit conditions and mitigation measure outlined in Section 3.5, *Cultural Resources*, impacts would be less than significant.

Mitigation Measures

Implementation of Mitigation Measures CUL-1 through CUL-10, presented on pages 45 of this MND, would reduce potential impacts to tribal cultural resources to a less-than-significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

The proposed trail expansion and renovation would require connections to the City's recycled water pipelines to irrigated new landscaping. As shown in Figure 5-2 in the City's Urban Water Management Plan, existing recycled water pipelines are located in the project corridor to the west of Centre City Parkway and intersect the project corridor at N. Broadway (Escondido 2016). An 18-mile pipeline system conveys tertiary-treated recycled water produced by the HARRF. Currently, the

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HARRF makes 9.0 million gallons per day (mgd) of recycled water for landscape and industrial use. During a multi-year drought, the City expects to have a recycled water supply of 4,400 acre-feet per year (AFY) in the year 2040. Recycled water would contribute to a total water supply that is adequate to meet demand in this scenario. Incremental expansion of the HARRF is planned to increase production of recycled water as customer demand increases in future years.

The project would use recycled water from the HARFF for landscaping. Landscaping would consist of native plants and pollinator gardens that are largely drought-tolerant and require low water input. This would minimize water demand by the project. The City also expects to have an adequate supply of recycled water in future years, even during multi-year droughts (Escondido 2016). A small amount of potable water would be used at four proposed water bottle filling stations. Therefore, the project would have adequate water supplies and would not require the construction of new or expanded water facilities.

Proposed pedestrian-scale lighting on the trail segment from N. Date Street to N. Midway Way would not exert substantial demand on electric power compared to residential and commercial development. Therefore, the project's electricity use would not require the construction of new or expanded offsite electricity facilities. In addition, the proposed trail expansion and renovation would not involve expansion of wastewater treatment, stormwater drainage, natural gas, or telecommunication facilities.

Utility work for the project would be limited to excavation and grading activity within the project corridor. Offsite utility work would not occur. As discussed in Section 10, *Hydrology and Water Quality*, grading for the project would be subject to the NPDES Construction General Permit. This would require implementation of BMPs to maintain or replicate the pre-development hydrologic regime. The project also would remove strips of pavement to add foot paths and landscaping, which would reduce the area of impermeable surface in the project corridor. Therefore, the project would not result in more stormwater runoff into the City's stormwater drainage facilities.

As discussed in Section 5, *Cultural Resources*, the project is directly adjacent to Escondido Creek, which would have served as a freshwater source and provided resources favorable to human occupation prior to its channelization in the 1960s, as evidenced by other nearby prehistoric sites located within 0.5-mile of the creek. Grading would require mitigation *CUL-1 Archaeological and Native American Monitoring*: Archaeological and Native American monitoring shall be required during initial project-related, ground-disturbing activities (e.g., grading prior to trail improvements and/or drilling prior to light installation). By implementing Mitigation Measure CUL-1, the City would evaluate and protect significant archaeological resources if encountered during construction, resulting in a less than significant impact.

For the reasons listed above, on-site utility work would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

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

The project would not include new restrooms or septic systems that could generate additional wastewater. Therefore, it would not affect the ability of wastewater treatment providers to accommodate wastewater generated in Escondido. No impact would occur.

NO IMPACT

- d. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The proposed trail expansion and renovation would not lead to a permanent increase in solid waste generated in Escondido. During construction, waste would be limited to debris from the removal of linear strips of existing pavement or subsurface material. Although trash cans could be installed in the project corridor, the disposal of waste by trail users would generate minimal additional solid waste for disposal at a landfill. Therefore, the project would not substantially increase solid waste generation, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

As shown in Figure VI-6 in the Community Protection Element of the City's General Plan, the project corridor is located in a moderate fire hazard zone to the east of Harmony Grove Road (Escondido 2012a). The remainder of the project corridor to the west of Harmony Grove Road is located in a high fire hazard zone. CAL FIRE's fire hazard severity map for the City shows that the western tip of the project corridor near Citracado Parkway is in a very high fire hazard severity zone in a local responsibility area (CAL FIRE 2009).

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Although the vast majority of the project corridor is not located in a very high fire hazard severity zone, CAL FIRE has mapped the western edge of the project corridor near Citracado Parkway as within such a zone (CAL FIRE 2009). Between the western terminus of the project corridor and Harmony Grove Road, the project would add striping to an existing maintenance road on the north side of Escondido Creek. This would improve the accessibility of Escondido Creek Trail in the very

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high five hazard severity zone, which would enhance emergency response and evacuation. The project would not alter the capacity of the trail or nearby roadways to accommodate emergency response vehicles or evacuations. Therefore, it would not impair an adopted emergency response plan or emergency evacuation plan related to wildfire. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

As discussed above, the project would improve the Escondido Creek Trail's accessibility in a very high fire hazard severity zone near Citracado Parkway. In this area the project would be limited to restriping an existing maintenance road. The project would not introduce features that exacerbate existing wildfire risks related to slope, prevailing winds, or the addition of flammable above-ground utility lines. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The project would not involve the installation or maintenance of new infrastructure such as roads, fuel breaks, emergency water sources, above-ground power lines, or other utilities that may exacerbate fire risk or result in other environmental impacts. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The project would involve surface modifications to an existing maintenance road in a very high fire hazard severity zone near Citracado Parkway. It would not alter existing risks to trail users from post-fire runoff, slope instability, or drainage changes. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Does the project:

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <p>a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>b. 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)?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

As discussed in Section 4, *Biological Resources*, certain proposed active transportation projects listed in the Plan could reduce the habitat of special-status species, disrupt nesting birds, and impair wetlands and riparian habitat. As discussed in Section 5, *Cultural Resources*, the construction of proposed projects would not impact historical resources; however, they may impact unanticipated archaeological resources. Potential impacts to biological resources would be reduced to a less-than-significant level with implementation of Mitigation Measures BIO-1 through BIO-6 to study, protect, and compensate for the loss of sensitive biological resources. Impacts to cultural resources would be reduced to a less-than-significant level with implementation of Mitigation Measure CR-1 for the

Escondido Creek Trail Expansion and Renovation Project

protection and recovery of cultural resources if discovered on construction sites. Therefore, impacts to biological and cultural resources would be reduced to less-than-significant levels with implementation of identified mitigation measures.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- 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)?*

As described in the discussion of environmental checklist Sections 1 through 20, the Plan would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated, with respect to all environmental issues. Cumulative impacts of several resource areas have been addressed in the individual resource sections above: Air Quality, Greenhouse Gases, Noise, and Transportation/Traffic (See CEQA Guidelines Section 15064(h)(3)). Proposed active transportation projects would reduce vehicle miles traveled and greenhouse gas emissions while improving overall air quality. Therefore, the Plan would not result in a cumulative traffic impact. Cumulative noise impacts would be less than significant because proposed facilities would not increase traffic on area roadways. Other resource areas (population/housing and mineral) were determined to have no impact.

Concurrently with this project, the City will be replacing existing chain link fencing with new wrought iron fencing along an approximately 1.3 mile portion of the Escondido Creek Trail, between Date Street and Midway Drive. These improvements would be undertaken completely separately from the proposed trail improvements under this project and would undergo separate environmental analysis under the National Environmental Policy Act. Replacing fencing along this portion of the trail is a separate, independent project that would occur regardless of the implementation of the proposed project. This replacement of fencing is therefore considered a cumulative project. The impacts of replacing fencing under this separate project would result in similar impact as the fencing for the proposed project. Impacts would be less than significant. Therefore, cumulative impacts would be less than significant.

Therefore, the Plan would not contribute to cumulative impacts related to these issues. Several resource issues (e.g., geology, hazards and hazardous materials) are by their nature project-specific and impacts at one location do not add to impacts at other locations or create additive impacts. As such, cumulative impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed in Section 3, *Air Quality*, proposed active transportation projects would not result in a direct or indirect air quality impact. As discussed in Section 13, *Noise*, construction of the proposed facilities may affect nearby sensitive receptors, but implementation of Mitigation Measures N-1 through N-3 would reduce construction noise impacts by requiring noise control measures to the extent feasible, such as locating stationary construction equipment as far from sensitive receptors as feasible and using the best available noise control techniques on equipment. Similarly, as discussed in Section 9, *Hazards and Hazardous Materials*, construction of

active transportation projects could occur on or near listed hazardous material sites, but implementation of Mitigation Measure HAZ-1 would reduce impacts by requiring assessment and remediation for any such active sites. Impacts to human beings would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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Appendix A

Air Quality Modeling

Road Construction Emissions Model, Version 9.0.0

Daily Emission Estimates for -> Escondido Creek Trail Project														
Project Phases (Pounds)	ROG (lbs/day)	CO (lbs/day)	NOx (lbs/day)	Total PM10 (lbs/day)	Exhaust PM10 (lbs/day)	Fugitive Dust PM10 (lbs/day)	Total PM2.5 (lbs/day)	Exhaust PM2.5 (lbs/day)	Fugitive Dust PM2.5 (lbs/day)	SOx (lbs/day)	CO2 (lbs/day)	CH4 (lbs/day)	N2O (lbs/day)	CO2e (lbs/day)
Grubbing/Land Clearing	1.71	12.46	16.89	5.71	0.71	5.00	1.67	0.63	1.04	0.03	3,374.57	1.00	0.04	3,410.25
Grading/Excavation	1.71	12.46	16.89	5.71	0.71	5.00	1.67	0.63	1.04	0.03	3,374.57	1.00	0.04	3,410.25
Drainage/Utilities/Sub-Grade	1.71	12.46	16.89	5.71	0.71	5.00	1.67	0.63	1.04	0.03	3,374.57	1.00	0.04	3,410.25
Paving	1.71	12.46	16.89	0.71	0.71	0.00	0.63	0.63	0.00	0.03	3,374.57	1.00	0.04	3,410.25
Maximum (pounds/day)	1.71	12.46	16.89	5.71	0.71	5.00	1.67	0.63	1.04	0.03	3,374.57	1.00	0.04	3,410.25
Total (tons/construction project)	0.17	1.23	1.67	0.49	0.07	0.42	0.15	0.06	0.09	0.00	334.08	0.10	0.00	337.61

Notes: Project Start Year -> 2022
 Project Length (months) -> 9
 Total Project Area (acres) -> 11
 Maximum Area Disturbed/Day (acres) -> 1
 Water Truck Used? -> Yes

Phase	Total Material Imported/Exported Volume (yd ³ /day)		Daily VMT (miles/day)			
	Soil	Asphalt	Soil Hauling	Asphalt Hauling	Worker Commute	Water Truck
Grubbing/Land Clearing	0	0	0	0	400	0
Grading/Excavation	0	0	0	0	400	0
Drainage/Utilities/Sub-Grade	0	0	0	0	400	0
Paving	0	0	0	0	400	0

PM10 and PM2.5 estimates assume 50% control of fugitive dust from watering and associated dust control measures if a minimum number of water trucks are specified.

Total PM10 emissions shown in column F are the sum of exhaust and fugitive dust emissions shown in columns G and H. Total PM2.5 emissions shown in Column I are the sum of exhaust and fugitive dust emissions shown in columns J and K.

CO2e emissions are estimated by multiplying mass emissions for each GHG by its global warming potential (GWP), 1, 25 and 298 for CO2, CH4 and N2O, respectively. Total CO2e is then estimated by summing CO2e estimates over all GHGs.

Total Emission Estimates by Phase for -> Escondido Creek Trail Project														
Project Phases (Tons for all except CO2e. Metric tonnes for CO2e)	ROG (tons/phase)	CO (tons/phase)	NOx (tons/phase)	Total PM10 (tons/phase)	Exhaust PM10 (tons/phase)	Fugitive Dust PM10 (tons/phase)	Total PM2.5 (tons/phase)	Exhaust PM2.5 (tons/phase)	Fugitive Dust PM2.5 (tons/phase)	SOx (tons/phase)	CO2 (tons/phase)	CH4 (tons/phase)	N2O (tons/phase)	CO2e (MT/phase)
Grubbing/Land Clearing	0.02	0.12	0.17	0.06	0.01	0.05	0.02	0.01	0.01	0.00	33.41	0.01	0.00	30.63
Grading/Excavation	0.07	0.49	0.67	0.23	0.03	0.20	0.07	0.02	0.04	0.00	133.63	0.04	0.00	122.51
Drainage/Utilities/Sub-Grade	0.06	0.43	0.59	0.20	0.02	0.17	0.06	0.02	0.04	0.00	116.93	0.03	0.00	107.20
Paving	0.03	0.18	0.25	0.01	0.01	0.00	0.01	0.01	0.00	0.00	50.11	0.01	0.00	45.94
Maximum (tons/phase)	0.07	0.49	0.67	0.23	0.03	0.20	0.07	0.02	0.04	0.00	133.63	0.04	0.00	122.51
Total (tons/construction project)	0.17	1.23	1.67	0.49	0.07	0.42	0.15	0.06	0.09	0.00	334.08	0.10	0.00	306.28

PM10 and PM2.5 estimates assume 50% control of fugitive dust from watering and associated dust control measures if a minimum number of water trucks are specified.

Total PM10 emissions shown in column F are the sum of exhaust and fugitive dust emissions shown in columns G and H. Total PM2.5 emissions shown in Column I are the sum of exhaust and fugitive dust emissions shown in columns J and K.

CO2e emissions are estimated by multiplying mass emissions for each GHG by its global warming potential (GWP), 1, 25 and 298 for CO2, CH4 and N2O, respectively. Total CO2e is then estimated by summing CO2e estimates over all GHGs.

The CO2e emissions are reported as metric tons per phase.

Appendix B

Cultural Resources Memorandum



Rincon Consultants, Inc.

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May 26, 2021
Project No: 20-09548

Brian Hannegan
RRM Design Group
32332 Camino Capistrano, Suite 205
San Juan Capistrano, California 92675

Subject: Cultural Resources Memorandum for the Escondido Creek Trail Expansion and Renovation Project in Escondido, San Diego County, California

Dear Mr. Hannegan:

RRM Design Group retained Rincon Consultants, Inc. (Rincon) on behalf of the City of Escondido (City) to conduct a cultural resources study in support of an Initial Study for the Escondido Creek Trail Expansion and Renovation Project (project), in the city of Escondido, San Diego County, California.

Rincon's scope of work for the study included a records search of the California Historical Resources Information System (CHRIS), a Sacred Lands File search (SLF) conducted by the Native American Heritage Commission (NAHC), field survey, and an assessment of potential, project-related impacts to cultural resources. This study has been prepared to support the project's compliance with the California Environmental Quality Act (CEQA); the City is the lead CEQA agency.

Project Location and Description

The project site is an approximately 4.5-mile long corridor along the banks of Escondido Creek in the city of Escondido. The western terminus of the corridor is near Citracado Parkway and the eastern end-point is N. Midway Drive. In almost 4.2 miles of the corridor, between Harmony Grove Road and N. Midway Drive, Escondido Creek is channelized and lined with concrete. The creek channel slopes gently downward from an elevation of approximately 680 feet at N. Midway Drive to 610 feet near Citracado Parkway. From Centre City Parkway to N. Escondido Boulevard, the creek channel enters a tunnel beneath urban development.

The existing multi-use Escondido Creek Trail is located in the following segments of the project corridor:

- The south side of Escondido Creek from Harmony Grove Road to Centre City Parkway;
- The north side of Escondido Creek from N. Broadway to N. Fig Street;
- Both sides of Escondido Creek from N. Fig Street to N. Date Street (with a bridge connecting the parallel segments at N. Date Street); and
- The south side of Escondido Creek from N. Date Street to N. Midway Drive.

Between Centre City Parkway and N. Broadway, the Escondido Creek Trail diverts from the project corridor, avoiding the creek channel's tunnel. In this segment the trail becomes a separated bikeway along Centre City Parkway, W. Valley Parkway, and N. Broadway.



Many transportation routes cross the project corridor over its 4.5-mile length. Key crossings include the I-15 overpass; a railroad bridge to the east of N. Tulip Street; and multiple north-south arterial roadways such as Centre City Parkway, N. Broadway, and N. Ash Street. Near the Escondido Transit Center, the Inland-Rail Trail crosses Escondido Creek on a bridge and intersects with the Escondido Creek Trail. The Inland-Rail Trail is a multi-use path that parallels the Sprinter Light Rail line and connects Escondido with San Marcos. Figure 2 shows the project site’s local setting in Escondido.

The proposed project would expand and renovate the existing Escondido Creek Trail in an approximately 4.5-mile corridor in the city of Escondido. Currently, the trail’s western terminus is at Harmony Grove Road. Once construction of the Citracado Parkway extension is complete (estimated 2022), the current project would extend the trail westward to Citracado Parkway. Proposed project related activities between Citracado Parkway and Harmony Grove Road include slurry seal and striping of the existing roadway. The project has been designed to avoid a sensitive resource of Native American origin (see Cultural Resources Records Search Section, below) known to exist in the vicinity of Citracado Parkway. Because of the known resource, project-related work between Citracado Parkway and Harmony Grove Road will not include any ground disturbance. From Harmony Grove Road eastward to N. Midway Drive, the project would involve landscaping and recreational improvements to the existing trail. Table 1 describes the proposed features by segment of the trail corridor.

Table 1 Proposed Features by Trail Segment

Trail Segment	Feature
Citracado Parkway to Harmony Grove Road	<ul style="list-style-type: none"> Expansion of trail on existing maintenance road by adding striping for bicycle lanes. New trail access point at Harmony Grove Road. No ground disturbance will occur within this segment of the project site.
Harmony Grove Road to N. Quince Street	<ul style="list-style-type: none"> Decomposed granite surface on south side of the creek. Minimal grading will occur to depths that average approximately 2 feet below ground surface (bgs).
N. Quince Street to N. Broadway	<ul style="list-style-type: none"> No work (trail follows existing streets in this segment).
N. Broadway to N. Hickory Street	<ul style="list-style-type: none"> Landscaping and trail improvements (likely decomposed granite surface) on north side of creek. Minimal grading will occur to depths that average approximately 2 feet bgs.
N. Hickory Street to N. Fig Street	<ul style="list-style-type: none"> Landscaping improvements on north side of creek.
N. Elm Street to N. Midway Drive	<ul style="list-style-type: none"> Decomposed granite surface, landscaping improvements, and new trail access point at N. Beech Street on north side of creek. 4 new outdoor fitness stations with bike racks on north side of creek. Landscaping improvements on south side of creek. 75 lighting fixtures on north side of trail from N. Date Street to N. Midway Way. 65 light fixtures on south side of trail from N. Ash Street to N. Midway Drive. Bike racks near N. Date Street and Washington Park. Minimal grading will occur to depths that average approximately 2 feet bgs. Additionally, drilling to depths of approximately 5 feet bgs will be required to install footings for the light fixtures.

In addition to the trail features listed in Table 1, the project would add new fencing, potable water features, and trees. Between the trail and the creek, an existing six-foot chain link fence would be replaced with a 4.5-foot cable fence. Vines would be planted along some segments of the new creekside

fence. Next to adjacent streets, an existing six-foot chain link would be replaced with a black wrought-iron fence from four to six feet high. Some six-foot privacy fences at the boundary of adjacent properties also would be replaced with a six-foot chain link fence and vines in some reaches and a six-foot wrought-iron fence in other areas. In landscaped areas, the City would plant more than 150 trees. Four existing Mexican fan palm trees would be removed. Four water bottle filling stations also would be installed along the trail.

Regulatory Setting

This section includes a discussion of the applicable State and local laws, ordinances, regulations, and standards governing cultural resources, which must be adhered to before and during implementation of the proposed project.

State

California Environmental Quality Act

CEQA (Section 21084.1) requires that a lead agency determine whether a project could have a significant effect on historical resources. A *historical resource* is a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (Section 21084.1), a resource included in a local register of historical resources (Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (Section 15064.5[a][3]).

PRC Section 5024.1, Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1 were used as the basic guidelines for this cultural resource study. PRC Section 5024.1 requires an evaluation of historical resources to determine their eligibility for listing in the CRHR. The purpose of the register is to maintain listings of the state's historical resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below.

According to PRC Section 5024.1(c)(1–4), a resource is considered *historically significant* if it: 1) retains substantial integrity, and 2) meets at least one of the following CRHR criteria.

- Criterion 1** It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Criterion 2** It is associated with the lives of persons important in our past.
- Criterion 3** It embodies the distinctive characteristics of a type, period, region or method of installation, or represents the work of an important creative individual, or possesses high artistic values.
- Criterion 4** It has yielded or may be likely to yield information important in prehistory or history.

According to the Office of Historic Preservation (OHP) guidelines, all buildings constructed over 45 years ago may be considered for potential historical resources. Most resources must meet the 45-year threshold for historic significance; however, resources less than 45 years in age may be eligible for listing on the CRHR if it can be demonstrated that sufficient time has passed to understand their historical importance (California State Office of Historic Preservation 1995).



Local

City of Escondido

The *Resource Conservation Element* Section of the City of Escondido's General Plan includes the following:

5. Historic and Cultural Resources

Goal 5: Preservation of important cultural and paleontological resources that contribute to the unique identity and character of Escondido.

Cultural Resources Policy 5.1: Maintain and update the Escondido Historic Sites Survey to include significant resources that meet local, state, or federal criteria.

Cultural Resources Policy 5.2: Preserve significant cultural and paleontological resources listed on the national, State, or local registers through: maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process.

Cultural Resources Policy 5.3: Consult with appropriate organizations and individual (e.g., South Coastal Information Center of the California Historical Resources Information System, Native American Heritage Commission, Native American groups and individuals, and San Diego Natural History Museum) early in the development process to minimize potential impacts to cultural and paleontological resources.

Cultural Resources Policy 5.4: Recognize the sensitivity of locally significant cultural resources and the need for more detailed assessments through the environmental review process.

Cultural Resources Policy 5.5: Preserve historic buildings, landscapes, and districts with special and recognized historic or architectural value in their original locations through preservation, rehabilitation (including adaptive reuse), and restoration where the use is compatible with the surrounding area.

Cultural Resources Policy 5.6: Review proposed new development and/or remodels for compatibility with the surrounding historic context.

Cultural Resources Policy 5.7: Comply with appropriate local, State, or federal regulations governing historical resources.

Cultural Resources Policy 5.8: Consider providing financial incentives, and educational information on existing incentives provided by the federal government to private owners and development in order to maintain, rehabilitate, and preserve historic resources.

Cultural Resources Policy 5.9: Educate the public on the City's important historic resources in increase awareness for protection (City of Escondido 2012a).

Cultural Resources Records Search

A search of CHRIS at the South Coastal Information Center (SCIC) located at San Diego State University was completed on September 4, 2020. The search was performed by SCIC staff to identify previously recorded cultural resources and previously conducted cultural resource studies within the project site



and a half-mile buffer surrounding it. The CHRIS search included a review of the NRHP, the CRHR, the Office of Historic Preservation Built Environment Resources Directory, and the Archaeological Determinations of Eligibility list.

The SCIC records search identified 94 cultural resources studies previously conducted within 0.5-mile of the project site (Attachment A). A portion of 22 of these studies overlap with the current project site. Three of these studies, SD-17745 (Smith et al. 2018), SD-18356 (Stropes and Smith 2012), and SD-18357 (Stropes and Smith 2016) discuss the archaeological testing and evaluation of resource P-37-12209/H, the recorded boundary of which overlaps the project site. The SCIC records search identified 455 previously recorded cultural resources within a 0.5-mile radius of the project site (Attachment A). These resources include 423 historic-period resources consisting of 418 buildings (predominantly residential), four refuse scatters, one road, one park, and one well; 30 resources of Native American origin including 26 sites and four isolated artifacts; and two multicomponent resources consisting of both prehistoric and historic-period components. As mentioned above, the recorded boundary of resource P-37-12209/H, a CEQA-significant multicomponent archaeological site, overlaps a portion of the project site’s westernmost segment between Citracado Parkway and Harmony Grove Road. Resource P-37-12209/H is the only resource with recorded boundaries within the project site.

Table 2 Previously Recorded Resources within the Project Site

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	NRHP/CRHR Status
37-12209/H	CA-SDI-12209/H	Multicomponent Prehistoric/Historic	Prehistoric habitation site with milling features, pictographs, and artifact scatters and an historic-period reservoir and two residences	Lenker 1973 Lenker 1978 Linehan and Strudwick 1991 Underwood et al. 2001 Morgan and Tennesen 2010 Stropes 2016 Stropes 2018 Accardy 2018	Recommended NRHP/CRHR eligible

Source: SCIC 2020

P-37-12209/H

Resource P-37-12209/H was initially recorded by Jane Lenker in 1978 as a surface scatter of lithics. Subsequent studies (Stropes and Smith 2012; Stropes and Smith 2016; Smith et al. 2018) have since determined that P-37-12209/H is a two acre multicomponent archaeological site, consisting of prehistoric Native American habitation elements comprised of hundreds of milling features, surface scatters and subsurface deposits of lithic and pottery, faunal remains, at least one human cremation burial, pictographs, an historic-period reservoir, and two historic-period residences across four loci. The southeastern edge of the recorded boundary of Locus 1 overlaps a portion of the project site’s westernmost segment between Citracado Parkway and Harmony Grove Road. The prehistoric components of site P-37-12209/H are likely part of a larger village complex that includes nearby resource P-37-8280.

Beginning in 2010, Brian F. Smith and Associates, Inc. (BFSA) became involved in an ongoing archaeological study for the planned construction of the Citracado Parkway Extension Project as part of the City's engineering design of the roadway and for the environmental compliance documentation required under CEQA. Following subsurface testing of the site in 2012, BFSA recommended resource P-37-12209/H CRHR eligible (City of Escondido 2012b; Stropes and Smith 2012). In 2014, the City of Escondido applied for a Clean Water Act Section 404 Permit for the Citracado Parkway Extension Project and BFSA prepared the supporting Section 106 (National Historic Preservation Act [NHPA]) report (Stropes and Smith 2016). As a result of the Section 106 study which involved Phase III data recovery excavations, a recommendation of eligibility for listing on the NRHP was provided for P-37-12209/H (Stropes and Smith 2016). Archaeological studies conducted for the Citracado Parkway Extension Project established Native American occupation of the site between approximately 5,630 Before Present (BP) and 300 BP (Stropes and Smith 2012; Stropes and Smith 2016).

Sacred Lands File Search

Rincon contacted the NAHC on September 3, 2020, to request an SLF search of the project site and a 0.5-mile radius. As part of this request, Rincon asked the NAHC to provide a list of Native American groups and/or individuals culturally affiliated with the area who may have knowledge of cultural resources within the project site. The NAHC responded on September 22, 2020, stating the results of the SLF search were positive (Appendix B). The positive SLF result is likely related to the fact that the recorded boundary of resource P-37-12209/H overlaps the westernmost segment of the project site. As the CEQA lead agency, the City of Escondido is responsible for conducting Native American consultation for the project in compliance with Assembly Bill 52.

Archival Research

A review of historical aerial photographs and topographic maps indicates Escondido Creek was channelized between 1964 and 1967 (NETROnline 1964 and 1967). Aerial photographs taken in 1978 show the transformation of the project corridor, which was increasingly occupied by residential and commercial development in the 1970s, a stark difference between an area largely characterized by agricultural development in the 1940s and 50s (NETROnline Var.). Aerial photography from the late 1990s onward depicts the project site largely as it is today with paved surfaces lining the Escondido Creek Trail (NETROnline Var.).

Field Survey

Rincon Archaeologist, Mark Strother, MA, Registered Professional Archaeologist (RPA), conducted a pedestrian survey of the proposed project site on February 11, 2021 (Figure 3 through Figure 12, Attachment 1). Overall, ground visibility was poor (approximately 10 to 20 percent) as much of the project site is developed with the existing paved trail. Areas of exposed ground surface are confined to the shoulders of the alignment. Exposed soils throughout the project site consist of light to medium-brown sandy loam, typically intermixed with gravel and/or decomposing granite. No cultural resources were identified within the project site during the survey. The survey confirmed the presence of prehistoric components attributed to P-37-12209/H including bedrock milling slicks and surficial lithic flakes adjacent to portions of the western segment of the project site. Although the recorded boundaries of the resource overlap the project site, no elements of the resource were observed within



the project site during the survey. The project will not impact this resource because no ground disturbance will occur within its vicinity.

Findings and Recommendations

The current study included a cultural resources records search, archival research, a search of the NAHC's SLF that returned a positive result, and field survey that resulted in updating the record of one previously recorded resource, P-37-12209/H, a multicomponent archaeological site consisting of prehistoric Native American habitation elements, an historic-period reservoir, and two historic-period residences. The background research concluded the recorded boundary of resource P-37-12209/H extends into the project corridor. An archaeological survey of the project site confirmed the presence of P-37-12209/H adjacent to the westernmost segment of the project site, but did not identify any components within the project site and no other resources were identified. The project has been specifically designed to avoid resource P-37-12209/H. Project-related work in the vicinity of Citracado Parkway will not involve ground disturbance and will be limited to sealing and striping the existing paved roadway; no impacts to resource P-37-12209/H will occur. However, given the presence of 30 resources of Native American origin and two multicomponent archaeological sites that include prehistoric components within 0.5-mile of the project corridor, the project site should be considered sensitive for archaeological resources. The current project is directly adjacent to Escondido Creek, which would have served as a freshwater source and provided resources favorable to human occupation prior to its channelization in the 1960s, as evidenced by other nearby prehistoric sites located within 0.5-mile of the creek. Based on the results of this cultural resources study, Rincon recommends a finding of ***less than significant impact to historical and archaeological resources with mitigation incorporated*** under CEQA.

Due to the overall sensitivity of the project area, Rincon recommends archaeological and Native American monitoring take place during initial project-related ground disturbance within segments of the project site where ground disturbance will occur. A measure for the unanticipated discovery of cultural resources during project development as a best management practice is also provided. The project is also required to adhere to regulations regarding the unanticipated discovery of human remains, detailed below.

Archaeological and Native American Monitoring

Rincon recommends archaeological and Native American monitoring during initial project-related, ground-disturbing activities (e.g., grading prior to trail improvements and/or drilling prior to light installation). This monitoring should be conducted by a qualified archaeologist and Native American consultant. Archaeological monitoring should be performed under the direction of an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (NPS 1983). Native American monitoring should be provided by a locally affiliated tribal member. Monitors will have the authority to halt and redirect work should any archaeological resources be identified during project-related activities. If archaeological resources are encountered during ground-disturbing activities, work in the immediate area must halt and the find should be evaluated for listing in the CRHR. Once initial project-related, ground disturbing activities are completed, archaeological or Native American monitoring or both may be reduced or halted at the discretion of the monitors, in consultation with the lead agency, as warranted by conditions that merit such reduction or suspension.



Unanticipated Discovery of Archaeological Resources

If cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) should be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation, Native American consultation, and archaeological monitoring may be warranted to mitigate any significant impacts.

Unanticipated Discovery of Human Remains

If human remains are found, existing regulations outlined in the State of California Health and Safety Code Section 7050.5 state that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access and provide recommendations as to the treatment of the remains to the landowner and the City of Imperial.

Please do not hesitate to contact Rincon with any questions regarding this cultural resource study.



Sincerely,
Rincon Consultants, Inc.

A handwritten signature in black ink, appearing to read "M Strother".

Mark Strother, MA, RPA
Archaeologist

A handwritten signature in black ink, appearing to read "Breana Campbell-King".

Breana Campbell-King, MA, RPA
Principal Investigator and Senior Archaeologist

A handwritten signature in black ink, appearing to read "Christopher Duran".

Christopher Duran, MA, RPA
Principal

Attachments

- Attachment A Figures
- Attachment B SCIC Records Search Results
- Attachment C NAHC SLF Search Results



References

City of Escondido

- 2012a City of Escondido General Plan. Amended May 2012. Available online at:
<https://www.escondido.org/general-plan.aspx>
- 2012b Final Environmental Impact Report Citracado Parkway Extension Project. Prepared by AECOM on behalf of the City of Escondido, California. Available online at:
<https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/Citracado/FinalEIR.pdf>

California State Office of Historic Preservation

- n.d. California Office of Historic Preservation Technical Assistance Series #6 California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register). Available online at:
<https://ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202021%20update.pdf>
- 1995 Instructions for Recording Historical Resources. Sacramento, California. Electronic document, online at <http://scic.org/docs/OHP/manual95.pdf>

National Park Service (NPS)

- 1983 Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines. Available online at: http://www.nps.gov/history/local-law/Arch_Standards.htm.

NETROnline

- Var. Historic aerial photographs of the project site, Escondido, California. Available online at:
<https://www.historicaerials.com/viewer>

Stropes, Tracy A. and Brian F. Smith

- 2012 Cultural Resources Survey and Evaluation Program for the Citracado Parkway Extension Project, City of Escondido, California. On file at the South Coastal Information Center, San Diego State University.
- 2016 A Section 106 (NHPA) Report Prepared in Support of a Clean Water Act Section 404 Permit Application for the Citracado Parkway Extension Project, City of Escondido, California. On file at the South Coastal Information Center, San Diego State University.

Smith, Brian F., Tracy A. Stropes, and J.R.K Stropes

- 2018 An Archaeological/Historical Study for the Citracado Business Park West Project, City of Escondido. On file at the South Coastal Information Center, San Diego State University.

Attachment A

Figures

Figure 1 Project Vicinity Map



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 Project Location

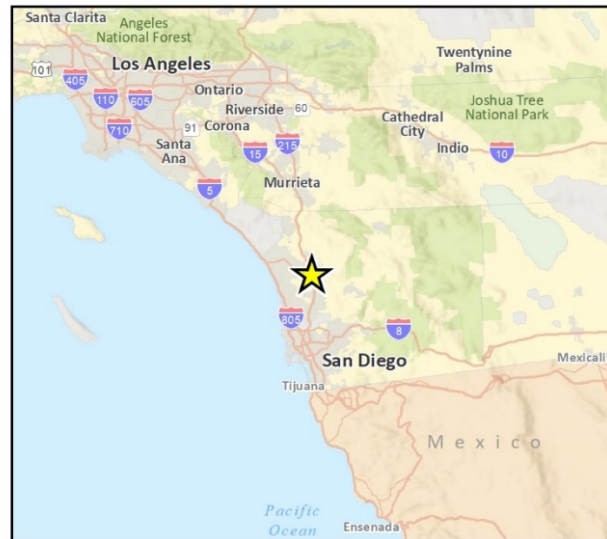
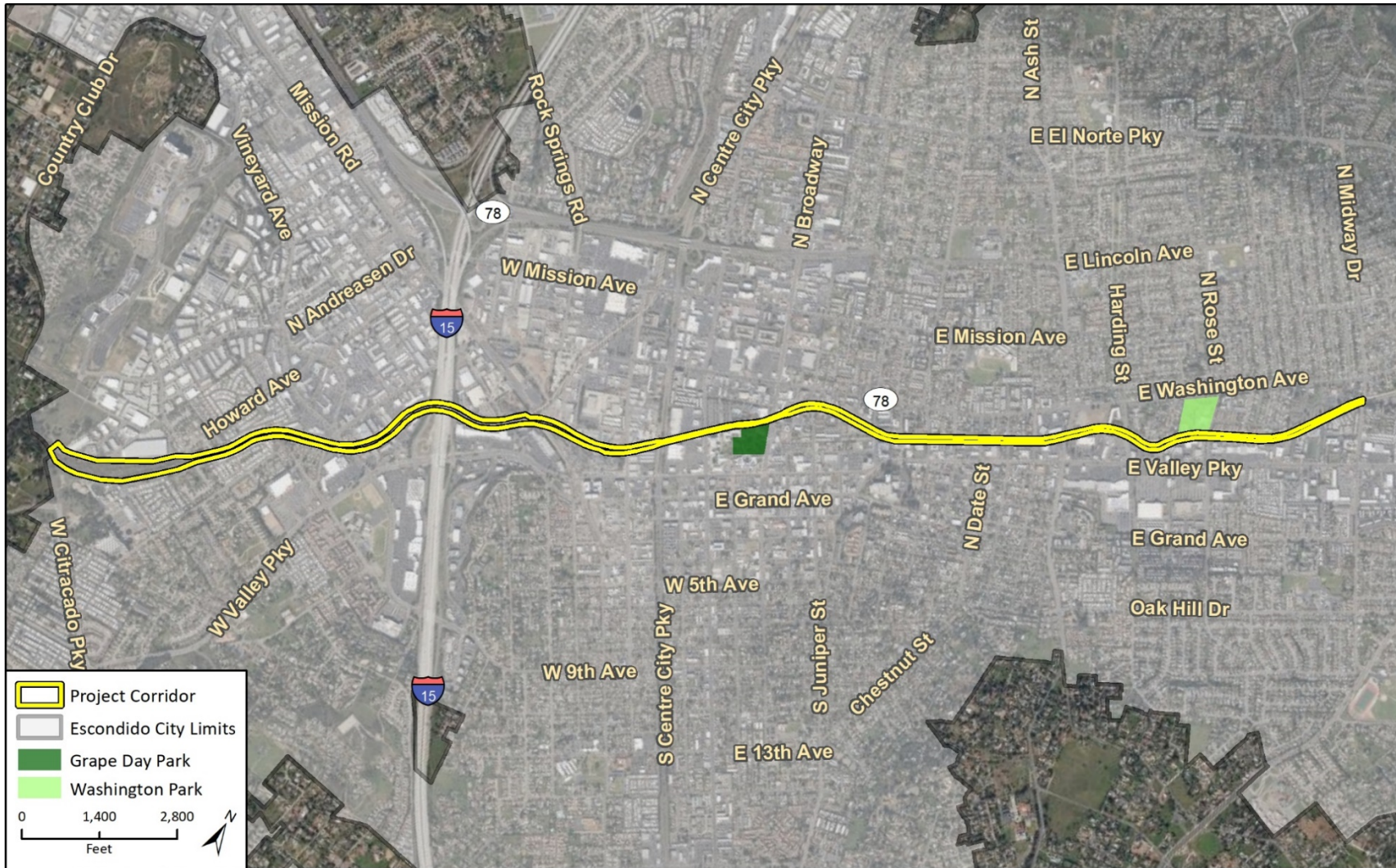


Fig. 3 Regional Location

Figure 2 Project Location Map



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Fig 2 Project Corridor

Figure 3 Eastward view of trail corridor between Citracado Parkway and Harmony Grove Road



Figure 4 Eastward view of trail corridor and neighboring mobile home park east of Harmony Grove Road



Figure 5 Westward view of I-15 overpass from trail corridor



Figure 6 Eastward view of trail corridor to the east of I-15 overpass



Figure 7 Eastward view of trail corridor and lighting fixtures, to east of N. Broadway



Figure 8 Eastward view of trail corridor between N. Hickory Street and N. Fig Street



Figure 9 Northeast-ward view of trail corridor to the east of N. Fig Street



Figure 10 Eastward view of trail corridor near N. Midway Drive



Figure 11 Eastward view from western terminus of project site



Figure 12 Westward view beyond the western terminus of the project corridor



Attachment B

SCIC Records Search Results

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-00429	NADB-R - 1120429; Voided - CHACE 11	1977	Chace, Paul G.	An Archaeological and Historical Survey of the Lincon Ash Interim Facility, In The City of Escondido, California	Paul G. Chace & Associates	37-000157, 37-001036
SD-00478	NADB-R - 1120478; Other - 11208-105671; Voided - CORUM 14	1978	Corum, Joyce M.	An Archaeological Survey Report for a Proposed Interstate 15 Crossing Rancho Bernardo (11-SD-15 M22.8/M27.2) 11208-105671	CALTRANS	37-000058, 37-000566, 37-000573, 37-000583, 37-000585, 37-000587, 37-000588, 37-000751
SD-00491	NADB-R - 1120491; Voided - CHACE 45	1979	Chace, Paul G.	An Archaeological/Historical Recordation and Testing Program for the Westridge Industrial Park.	Paul G. Chace & Associates	37-005501, 37-005502, 37-005503, 37-005504, 37-005505
SD-00757	NADB-R - 1120757; Voided - CHACE 80	1984	Chace, Paul G.	An Archaeological Survey of the Calco West Property	Paul G. Chace & Associates	37-000154, 37-000156, 37-005050, 37-005089, 37-005501, 37-005502, 37-005503, 37-007871, 37-008280, 37-008305, 37-008339
SD-00783	NADB-R - 1120783; Voided - CHEEVER09	1986	Cheever, Dayle and Dennis Gallegos	Cultural Resource Survey of the La Terraza Project Escondido, California	WESTEC	
SD-01017	NADB-R - 1121017; Voided - GALLEGO 31	1987	Gallegos, Dennis and Andrew Pignoli	Cultural Resource Survey of the Osborne OV6 Trunk Sewer Line, Vista, California	WESTEC Services, Inc.	
SD-01079	NADB-R - 1121079; Voided - FIR 19	1978	Flower, Douglas, Darcy Ike, and Linda Roth	Archaeological and Historical Survey of Westridge Industrial Park, Escondido, California.	Flower, Ike & Roth Archaeological Consultants	
SD-01407	NADB-R - 1121407; Voided - CHACE 70	1982	Chace, Paul G.	An Archaeological Reconnaissance and Testing Program for the Storm Drain Alignment-Hale Avenue Sewage Treatment Plant, Escondido, California.	Paul G. Chace & Associates	37-007871, 37-008280
SD-01707	NADB-R - 1121707; Voided - PRICE 4	1980	Price, Harry J. Jr.	Archaeological Survey 11-SD-78 P.M. 19.-19.8 11212-185171	Caltrans	
SD-01828	NADB-R - 1121828; Voided - CHACE 67	1982	Chace, Paul G.	An Archaeological Survey of the Smith Property, Escondido, California	Paul G. Chace & Associates	
SD-02219	NADB-R - 1122219; Voided - GALLEGO103	1992	DENNIS GALLEGOS	HISTORICAL/ARCHAEOLOGICAL SURVEY REPORT FOR THE PROPOSED GRAND AVE, SECOND AVE, AND VALLEY BLVD SPECIFIC PLAN, ESCONDIDO, CALIFORNIA	GALLEGOS AND ASSOCIATES	
SD-02235	NADB-R - 1122235; Voided - ROSEN 27	1991	MARTIN D. ROSEN	NEGATIVE ARCHAEOLOGICAL SURVEY REPORT: FIRST ADDENDUM ROUTE 11-SD-78	CALTRANS	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-02236	NADB-R - 1122236; Voided - ROSEN 28	1991	MARTIN D. ROSEN	ARCHAEOLOGICAL SURVEY REPORT ROUTE 11-SD-76	CALTRANS	
SD-02326	NADB-R - 1122326; Voided - KYLE 21	1992	KYLE, CAROLYN, KATHLEEN CRAWFORD, and DENNIS GALLEGOS	HISTORICAL/ARCHAEOLOGICAL SURVEY REPORT FOR THE PROPOSED GRAND AVENUE, SEC-OND AVENUE, AND VALLEY BOULEVARD SPECIFIC PLAN - ESCONDIDO, CA	GALLEGOS AND ASSOCIATES	
SD-02341	NADB-R - 1122341; Voided - SMITHB 148	1992	SMITH, BRIAN F.	ARCHAEOLOGICAL INVESTIGATIONS FOR THE HALE AVENUE WASTEWATER TREATMENT PLANT EXPANSION PROJECT	BRIAN F. SMITH AND ASSOCIATES	37-012601
SD-02346	NADB-R - 1122346; Voided - SMITHB 174	1991	SMITH, BRIAN F.	ARCHAEOLOGICAL INVESTIGATIONS FOR THE HALE AVENUE WASTEWATER TREATMENT PLANT EXPANSION PROJECT	BRIAN F. SMITH AND ASSOCIATES	37-008280
SD-02389	NADB-R - 1122389; Voided - SMITHB 182	1991	SMITH, BRIAN F.	ARCHAEOLOGICAL INVESTIGATIONS FOR THE HALE AVENUE WASTEWATER TREATMENT PLANT EXPANSION PROJECT - CITY OF ESCONDIDO, CA	BRIAN F. SMITH AND ASSOCIATES	37-008280
SD-03608	NADB-R - 1123608; Voided - PIGNIOLO50	1999	PIGNIOLO, ANDREW R. and MICHAEL BAKSH	CONFIDENTIAL CULTURAL RESOURCE INVENTORY AND EVALUATION PROGRAM FOR THE HARMONY GROVE PROJECT ESCONDIDO TRACT NO. 688R-A CITY OF ESCONDIDO, CALIFORNIA	TIERRA ENVIRONMENTAL SERVICES	37-017512, 37-017513, 37-017514, 37-017515, 37-017516, 37-017517, 37-017518
SD-03630	NADB-R - 1123630; Voided - YORKAND01	1996	YORK, ANDREW L.	ARCHAEOLOGICAL SURVEY FOR PROPOSED EXPANSION TO THE HALE AVENUE RESOURCE RECOVERY FACILITY, ESCONDIDO, CALIFORNIA	CITY OF ESCONDIDO	37-008280
SD-04301	NADB-R - 1124301; Voided - BANKS07	1980	BANKS, THOMAS and DAVID M. VAN HORN	ARCHAEOLOGICAL SURVEY REPORT: THE PROPOSED ESCONDIDO AUTO PARK IN THE CITY OF ESCONDIDO , CALIFORNIA	THOMAS BANKS	37-000153, 37-000154, 37-000156, 37-001035, 37-001505, 37-005501, 37-005502, 37-005503, 37-005504
SD-04719	NADB-R - 1124719; Voided - CITYESC 01	1990	CITY OF ESCONDIDO	ARCHAEOLOGICAL INVESTIGATIONS FOR THE HALE AVENUE WASTEWATER TREATMENT PLANT EXPANSION PROJECT - CONFIDENTIAL APPENDICES	CITY OF ESCONDIDO	37-000153, 37-000154, 37-000155, 37-000156, 37-001035, 37-005089, 37-005090, 37-005501, 37-005502, 37-005503, 37-005504, 37-005505, 37-007871, 37-008280, 37-008330
SD-04909	NADB-R - 1124909; Voided - COUNTYS42	1985	County of San Diego	Historic Property Survey Report Escondido Transit Center, San Diego County, CA	County San Diego Dept. of Public Works	

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SD-05678	NADB-R - 1125678; Voided - JOHNSON 20	1980	JOHNSON, MELISSA	NEGATIVE ARCHAEOLOGICAL SURVEY REPORT DISTRICT 11 COUNTY OF SAN DIEGO ROUTE 78	MELISSA JOHNSON	
SD-05982	NADB-R - 1125982; Voided - CITYSD 306	2000	CITY OF SAN DIEGO	MITIGATED NEGATIVE DECLARATION FOR PUMP STATION 77	CITY OF SAN DIEGO	
SD-08226	NADB-R - 1128226; Voided - PLETKA08	2003	PLETKA, NICOLE	CULTURAL RESOURCE ASSESSMENT AT&T WIRELESS SERVICES FACILITY NO. 20032 VALLEY CENTER, SAN DIEGO COUNTY, CALIFORNIA	NICOLE PLETKA	
SD-08588	NADB-R - 1128588; Voided - CITYESC03	1980	CITY OF ESCONDIDO	DRAFT ENVIRONMENTAL IMPACT REPORT FOR EXPANSION OF WASTEWATER TREATMENT FACILITY	CITY OF ESCONDIDO	
SD-08596	NADB-R - 1128596; Other - KEA JOB NO. 91-25; Voided - KELLER03	1992	KELLER ENVIRONMENTAL ASSOCIATES, INC	APPENDICES-RECLAIMED WATER DISTRIBUTION SYSTEM PROJECT: DRAFT ENVIRONMENTAL IMPACT REPORT	KELLER ENVIRONMENTAL ASSOC.	
SD-08729	NADB-R - 1128729; Voided - ERCE 25	1989	MITCHELL, PATRICIA	THE OCEANSIDE TO ESCONDIDO RAIL PROJECT	ERC ENVIRONMENTAL AND ENERGY SERVICES CO.	
SD-09077	NADB-R - 1129077; Voided - KYLE249	2002	KYLE, CAROLYN	CULTURAL RESOURCE ASSESSMENT FOR CINGULAR WIRELESS FACILITY SD729-03 CITY OF ESCONDIDO SAN DIEGO COUNTY, CALIFORNIA	KYLE CONSULTING	
SD-09078	NADB-R - 1129078; Voided - KYLE250	2002	KYLE, CAROLYN	CULTURAL RESOURCE ASSESSMENT FOR CINGULAR WIRELESS FACILITY SD730-02 CITY OF ESCONDIDO CALIFORNIA COUNTY OF SAN DIEGO, CALIFORNIA	KYLE CONSULTING	
SD-09247	NADB-R - 1129247; Voided - PIERSON124	2004	PIERSON, LARRY J.	A CULTURAL RESOURCES SURVEY OF THE PALOMAR POWER PLANT WATER PIPELINE RIGHT-OF-WAY PROJECT	BRIAN F. SMITH & ASSOCIATES	
SD-09250	NADB-R - 1129250; Voided - SMITH463	2004	SMITH, BRIAN F. and K. HARLEY MEIER	MITIGATION AND MONITORING REPORT FOR THE ESCONDIDO RESEARCH AND TECHNOLOGY CENTER	BRIAN F. SMITH & ASSOCIATES	37-025575, 37-025576, 37-025577, 37-025651
SD-09457	NADB-R - 1129457; Voided - MCGINNIS35	2004	McGinnis, Patrick	1325 E. Grand Avenue; Historical Evaluation	Tierra Environmental	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-09546	NADB-R - 1129546; Voided - GUERREM06	2001	Guerrero, Monica, Gallegos, Dennis, Stropes, Tracy, Bouscaren, Steve, Bugbee, Susan, and Cerreto, Richard	Cultural Resource Test Report for Oceanside- Escondido Rail Project Oceanside, California	Gallegos & Associates	
SD-09622	NADB-R - 1129622; Voided - MASON 33	2005	Mason, Roger, Evelyn Chandler, and Cary Cotterman	Cultural Resources Record Search and Field Survey Report for a Verizon Telecommunications Facility: Valley Parkway, Escondido, San Diego County, California	ECORP Consulting, Inc.	
SD-09763	NADB-R - 1129763; Other - RECON # 3859A; Voided - PRICEH13	2004	Price, Harry J.	Historic Building Survey of the Escondido Mutual Water District Shop/ Warehouse, 1201 East Washington Avenue, Escondido, California	RECON	
SD-09990	NADB-R - 1129990; Voided - CLIFFOR22	2006	Clifford, James and Alex Wesson	Cultural Resources Study for the Lumina Project, City of Escondido, San Diego County, California.	SWCA Environmental Consultants	
SD-10311	NADB-R - 1130311; Voided - PIERSON141	2006	PIERSON, LARRY J.	RESULTS OF THE CULTURAL RESOURCES MONITORING AND MITIGATION PLAN (CRMMP) FOR THE PALOMAR ENERGY CENTER PROJECT	BRIAN F. SMITH AND ASSOCIATES	
SD-10432	NADB-R - 1130432; Voided - HECTOR164	2006	HECTOR, SUSAN M.	CULTURAL RESOURCES SENSITIVITY ANALYSIS FOR THE CARRYOVER STORAGE AND SAN VICENTE DAM RAISE PROJECT (CSP) ALTERNATIVES ANALYSIS	ASM AFFILIATES, INC.	
SD-10551	NADB-R - 1130551; Voided - ARRINGT01	2006	ARRINGTON, CINDY	CULTURAL RESOURCES FINAL REPORT OF MONITORING AND FINDINGS FOR THE QWEST NETWORK CONSTRUCTION PROJECT, STATE OF CALIFORNIA	SWCA ENVIRONMENTAL CONSULTANTS	
SD-10713	NADB-R - 1130713; Voided - SMITHB566	2006	SMITH, BRIAN F.	ARCHAEOLOGICAL ASSESSMENT OF THE MOBILE HAVEN SENIOR'S PROJECT LOCATED IN THE CITY OF ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA	BRIAN F. SMITH AND ASSOCIATES	
SD-11907	NADB-R - 1131907; Voided - BONNEW211	2008	BONNER, WAYNE H., MARNIE AISLIN-KAY, SARAH WILLIAMS, and KATHLEEN CRAWFORD	CULTURAL RESOURCES RECORDS SEARCH AND SITE VISIT RESULTS FOR T- MOBILE USA CANDIDATE SD07128D (GUILDER GLEN) AT 1820-1826 GUILDER GLEN, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA	MICHAEL BRANDMAN ASSOCIATES	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-12039	NADB-R - 1132039; Voided - GALLEGO341	2007	GUERRERO, MONICA and DENNIS R. GALLEGOS	CULTURAL RESOURCES MONITORING REPORT FOR THE NORTH COUNTY TRANSIT DISTRICT (NCTD) SPRINTER RAIL PROJECT OCEANSIDE TO ESCONDIDO, CALIFORNIA	GALLEGOS & ASSOCIATES	37-012095, 37-012096, 37-012097, 37-015576, 37-015595
SD-12317	NADB-R - 1132317; Voided - WADES141	2008	WADE, SUE A.	HARMONY GROVE MAJOR USE PERMIT WIRELESS TELECOMMUNICATIONS FACILITY, NEGATIVE CULTURAL RESOURCE SURVEY REPORT, ESCONDIDO, CALIFORNIA	HERITAGE RESOURCES	
SD-12394	NADB-R - 1132394; Voided - PIERSON201	2009	PIERSON, LARRY J.	A HISTORICAL ASSESSMENT OF 1050 WEST WASHINGTON AVENUE, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA, APN 228-250-17	BRIAN F. SMITH & ASSOCIATES	
SD-12443	NADB-R - 1132443; Voided - BEARDV01	2009	BEARD, VICKI R.	A CULTURAL RESOURCES SURVEY FOR THE CROSSINGS AT ELDER PLACE HOUSING PROJECT ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA	TOM ORIGER & ASSOCIATES	
SD-12835	NADB-R - 1132835; Voided - ROBBINS306	2010	ROBBINS-WADE, MARY	ESCONDIDO BALLPARK- CULTURAL RESOURCES SURVEY	AFFINIS	
SD-13261	NADB-R - 1133261; Voided - PIGNIA268	2011	PIGNILOLO, ANDREW R. and JOHN DIETLER	AN ARCHAEOLOGICAL SURVEY OF THE ASH STREET BICYCLE UNDERCROSSING PROJECT, CITY OF ESCONDIDO, CALIFORNIA	LAGUNA MOUNTAIN ENVIRONMENTAL, INC.	
SD-13353	NADB-R - 1133353; Voided - GILETTA03	2012	GILETTI, ANDREW and MARY ROBBINS-WADE	PALOMAR-POMERADO HEALTH DEMOLITION PROJECT- ARCHAEOLOGICAL MONITORING (AFFINIS JOB NO. 2460)	AFFINIS	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-13626	NADB-R - 1133626; Voided - MORGAN05	2011	MORGAN, NICHOLE B.	TCM ACCESS ROAD GRADING PROJECT, CULTURAL RESOURCES INVENTORY REPORT	HDR	37-000744, 37-001097, 37-004575, 37-004607, 37-004905, 37-004927, 37-005826, 37-006134, 37-006135, 37-006139, 37-006140, 37-006830, 37-006858, 37-008280, 37-008914, 37-009089, 37-009655, 37-009708, 37-009980, 37-010671, 37-010672, 37-010823, 37-010875, 37-011728, 37-011729, 37-012209, 37-012461, 37-012818, 37-012820, 37-012821, 37-012940, 37-013084, 37-013085, 37-014563, 37-015863, 37-015867, 37-018386, 37-024458, 37-026492, 37-028681, 37-028737, 37-030107
SD-14200	NADB-R - 1134200; Voided - BOWDEN117	2012	BOWDEN-RENN, CHERYL	LETTER REPORT: ETS 22159- CULTURAL RESOURCES SURVEY FOR NEW POLE P24876, ESCONDIDO AREA OF NORTHERN SAN DIEGO COUNTY, CALIFORNIA- IO 7011102	AECOM	
SD-14328	NADB-R - 1134328; Voided - WILSONS44	2013	WILSON, STACIE	LETTER REPORT: ETS 20872 CULTURAL RESOURCES MONITORING FOR TL6956 UNDERGROUNDING TRENCH EXCAVATION, CITY OF ESCONDIDO, CALIFORNIA- IO 200414230	AECOM	
SD-14394	NADB-R - 1134394; Voided - DACA01	1983	DONALD A. COTTON ASSOCIATES	SURVEY REPORT ON HISTORIC/ CULTURAL RESOURCES CITY OF ESCONDIDO	DONALD A. COTTON ASSOCIATES	
SD-14396	NADB-R - 1134396; Voided - HUDLOW01	2013	HUDLOW, SCOTT A.	A PHASE I CULTURAL RESOURCE SURVEY FOR ESCONDIDO FAMILY DEVELOPMENT, CITY OF ESCONDIDO, CALIFORNIA	HUDLOW CULTURAL RESOURCE ASSOCIATES	
SD-14691	NADB-R - 1134691; Voided - MOOREC01	2012	MOORE, CRAIG	CONSULTATION REGARDING 355 W. GRAND AVE., ESCONDIDO, CA	AMERICAN WEST BANK	
SD-14692	NADB-R - 1134692; Voided - LEVINEH02	2012	LEVINE, HEDY	INTERIOR RENOVATIONS ESCONDIDO MEDICAL FAMILY OFFICE, 255 NORTH ASH ST., ESCONDIDO, SAN DIEGO COUNTY, CA	ESCONDIDO MEDICAL FAMILY OFFICE	
SD-14770	NADB-R - 1134770; Voided - JONESET01	2013	JONES, E. TIMOTHY	SDWCA MICROWAVE COMMUNICATIONS PROJECT, SAN DIEGO COUNTY, ESCONDIDO OPERATIONS CENTER; LSA PROJECT #KPF1201	LSA ASSOCIATES	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-14771	NADB-R - 1134771; Voided - JONESET02	2013	JONES, E. TIMOTHY	A CULTURAL RESOURCES STUDY FOR THE SDCWA MICROWAVE COMMUNICATIONS PROJECT SAN DIEGO COUNTY, CALIFORNIA	LSA ASSOCIATES, INC.	37-005638, 37-005639, 37-013871, 37-014150, 37-014152, 37-015577, 37-032874
SD-14775	NADB-R - 1134775; Voided - SHINGA03	2013	SHINGLETON, ARLAN W.	NEW BANK BRANCH OFFICE AT 360 WEST GRAND AVENUE, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA	FIRST CITIZENS BANK	
SD-14798	NADB-R - 1134798; Voided - ROYJ13	2014	ROY, JULIE	LETTER REPORT: ETS 26892- CULTURAL RESOURCES MONITORING REPORT FOR REPLACEMENT ACTIVITIES FOR POLE P10935, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA- IO 5005243	AECOM	
SD-15113	NADB-R - 1135113	2014	WAYNE H. BONNER and KATHLEEN A. CRAWFORD	DIRECT APE HISTORIC ARCHITECTURAL ASSESSMENT FOR T-MOBILE WEST, LLC CANDIDATE SD06590A (SD590 LIGHT & LIFE CHURCH) 110 NORTH ASH STREET, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA	ENVIRONMENTAL ASSESSMENT SPECIALISTS, INC.	
SD-15151	NADB-R - 1135151	2015	DAVID BRUNZELL	CULTURAL RESOURCES ASSESSMENT OF THE CROWN CASTLE/ VERIZON FIBER PUC PROJECT, SAN DIEGO, CALIFORNIA (BCR CONSULTING PROJECT NO. SYN1404)	BCR CONSULTING LLC	
SD-15266	NADB-R - 1135266	2015	DAVID BRUNZELL	CULTURAL RESOURCES ASSESSMENT OF THE WESTSIDE PARK PROJECT, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA (BCR CONSULTING PROJECT NO. TRF1434)	BCR CONSULTING LLC	
SD-15375	NADB-R - 1135375	2015	Susan M. Hector	Archaeological Monitoring for the Installation of New Pole P253454, Harmony Grove, Escondido, San Diego County, California (SDG&E eTS #29685)	NWB Environmental Services, LLC	
SD-15558	NADB-R - 1135558	2013	Wayne H. Bonner, Sarah A. Williams, and Kathleen A. Crawford	CULTURAL RESOURCES RECORDS SEARCH AND SITE VISIT RESULTS FOR T-MOBILE, LLC CANDIDATE SD06199A (BROADWAY & 2ND) 126 EAST SECOND AVENUE, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA	Environmental Assessment Specialists, Inc	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-15628	NADB-R - 1135628	2013	Wayne H. Bonner, Sarah A. Williams, and Kathleen A. Crawford	CULTURAL RESOURCES RECORDS SEARCH AND SITE VISIT RESULTS FOR T-MOBILE WEST, LLC CANDIDATE SD06590A (SD590 LIGHT & LIFE CHURCH) 110 NORTH ASH STREET, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA	Environmental Assessment Specialists, Inc	
SD-15653	NADB-R - 1135653; Other - CYG530	2014	Phil Fulton	CULTURAL RESOURCE ASSESSMENT CLASS III INVENTORY, VERIZON WIRELESS SERVICES, 78 LINCOLN FACILITY, CITY OF ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA	LSA Associates, Inc	
SD-15868	NADB-R - 1135868	2014	Carrie D. Wills and Sarah A. Williams	CULTURAL RESOURCE RECORDS SEARCH AND SITE VISIT RESULTS FOR AT&T MOBILITY, LLC CANDIDATE SD1870 (ESCONDIDO TRANSIT CENTER), 520 WEST GANNON PLACE, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA	First Carbon Solutions	
SD-16428	NADB-R - 1136428	2014	ROBBINS-WADE, MARY and GILETTI, ANDREW	CULTURAL RESOURCES INVENTORY AND ASSESSMENT: VALIANO, SAN DIEGO COUNTY, CALIFORNIA, CASE NUMBER PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-STP-13-003, PDS2013-TM-5575, PDS2013-REZ-13-001, PDS2013-ER-13-08-002	Affinis, HELIX Environmental	
SD-16429	NADB-R - 1136429	2015	ROBBINS-WADE, MARY	CULTURAL RESOURCES SURVEY AND ASSESSMENT: VALIANO, SAN DIEGO COUNTY, CALIFORNIA	HELIX Environmental	
SD-16430	NADB-R - 1136430	2013	VAN WORMER, STEPHEN and WALTER, SUSAN D.	HISTORICAL ASSESSMENT OF BUILDINGS AND FEATURES AT THE HARMONY GROVE EQUESTRIAN CENTER AT 1805 COUNTRY CLUB DRIVE, HARMONY GROVE, CALIFORNIA 92029	Walkter Enterprises	
SD-16442	NADB-R - 1136442; Submitter - 2527	2014	ROBBINS-WADE, MARY and GILETTI, ANDREW	RESEARCH DESIGN AND DATA RECOVERY PLAN: VALIANO, SAN DIEGO COUNTY, CALIFORNIA, CASE NUMBER PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-STP-13-003, PDS2013-TM-5575, PDS2013-REZ-13-001, PDS2013-ER-13-08-002	Affinis	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-16451	NADB-R - 1136451; Submitter - 2015-008	2015	GARCIA-HERBST, ARLEEN	CULTURAL RESOURCES INVENTORY FOR THE HALE AVENUE RESOURCE RECOVERY FACILITY STORAGE PROJECT, CITY OF ESCONDIDO, COUNTY OF SAN DIEGO, CALIFORNIA	Spindrift Archaeological Consulting, LLC	37-008280
SD-16557	NADB-R - 1136557; Submitter - 23460	2014	GORMAN, JENNIFER	HISTORIC RESOURCES TECHNICAL REPORT FOR THE NORTH INLAND RESIDENTIAL CRISIS CENTER, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA	ASM Affiliates	
SD-16763	NADB-R - 1136763	2016	SMITH, BRIAN F. and REINICKE, KRISTEN R.	HISTORIC STRUCTURE ASSESSMENT FOR 351 WEST THIRD AVENUE CITY OF ESCONDIDO, CALIFORNIA APN 233-141-02	Brian F. Smith, and Associates	37-017776, 37-017777
SD-16887	NADB-R - 1136887; Submitter - 8175	2016	PRICE, HARRY J.	ARCHAEOLOGICAL SURVEY REPORT FOR THE ESCONDIDO VICTORY INDUSTRIAL PARK, ESCONDIDO, CALIFORNIA	RECON	
SD-16924	NADB-R - 1136924	2017	SMITH, BRIAN F. and Stropes, Jennifer R.K.	HISTORIC STRUCTURE ASSESSMENT FOR 862 NORTH BROADWAY, ESCONDIDO, CALIFORNIA APN 229-130-49	Brian F. Smith and Associates, Inc.	
SD-16924						
SD-17233	NADB-R - 1137233; Submitter - BCR Project No. SYN1622	2017	BRUNZELL, DAVID	SAN DIEGO 129 PROJECT, SAN DIEGO COUNTY, CALIFORNIA (BCR CONSULTING PROJECT NO. SYN1622)	BCR Consulting LLC	
SD-17339	NADB-R - 1137339	2015	ROBBINS-WADE, MARY and NICOLE FALVEY	RECYCLED WATER EASTERLY MAIN AND TANKS PROJECT AND BRINE LINE, BROADWAY TO HALE AVENUE RESOURCE RECOVERY FACILITY (HARRF) PROJECT - CULTURAL RESOURCES STUDY	HELIX ENVIRONMENTAL PLANNING, INC.	
SD-17377	NADB-R - 1137377; Submitter - RECON NUMBER 8811	2018	ZEPEDA-HERMAN, CARMEN	RESULTS OF THE ARCHAEOLOGICAL RESOURCES MONITORING PROGRAM FOR THE ESCONDIDO INNOVATION CENTER, ESCONDIDO, CALIFORNIA	RECON	37-035964, 37-035965
SD-17438	NADB-R - 1137438	2009	WADE, SUE	94/ENGINEER SPRINGS WIRELESS TELECOMMUNICATION FACILITY (MUP 06- 087, ER 06-19-029): CULTURAL RESOURCE MONITORING	HERITAGE RESOURCES	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-17484	NADB-R - 1137484	2018	VADER, MICHAEL	CITY OF ESCONDIDO PHASE I AGRICULTURAL REUSE AND SALT REDUCTION PROJECT EXTENDED PHASE I ARCHAEOLOGICAL INVESTIGATION	ESA	37-037343
SD-17529	NADB-R - 1137529	2018	DROESSLER, RACHEL	LETTER REPORT: ETS 36501 - CULTURAL RESOURCES MONITORING OF POLES Z510498, Z207014S, AND P207021S REPLACEMENT, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA - IO 7074265	ICF	
SD-17574	NADB-R - 1137574	2017	MANCHEN, KENT and BRIAN WILLIAMS	SUPPLEMENTAL ARCHAEOLOGICAL SURVEY FOR THE MINOR PROJECT REFINEMENTS: CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE RAINBOW-SAN DIEGO (LINE 3602) 36-INCH NATURAL GAS PIPELINE PROJECT, SAN DIEGO COUNTY, CALIFORNIA	ASM AFFILIATES, INC.	
SD-17576	NADB-R - 1137576; Submitter - PN 22520	2016	CASTELLS, SHELBY GUNDERMAN, MATTHEW DECARLO, and BRIAN WILLIAMS	CULTURAL RESOURCE SURVEY REPORT FOR THE SAN DIEGO GAS & ELECTRIC COMPANY AND SOUTHERN CALIFORNIA GAS COMPANY PIPELINE SAFETY & RELIABILITY PROJECT, SAN DIEGO COUNTY, CALIFORNIA	ASM AFFILIATES, INC.	37-000007, 37-000577, 37-000585, 37-000592, 37-004556, 37-004560, 37-004561, 37-004634, 37-004806, 37-005072, 37-005211, 37-006001, 37-006083, 37-006722, 37-007310, 37-007313, 37-007315, 37-007836, 37-009124, 37-010169, 37-010917, 37-010918, 37-011466, 37-011467, 37-012587, 37-012919, 37-012920, 37-014275, 37-017538, 37-017539, 37-019199, 37-030889, 37-033557, 37-037730, 37-037731, 37-037732, 37-037733, 37-037734, 37-037735, 37-037736, 37-037737
SD-17577	NADB-R - 1137577	2016	DAVIS, SHANNON	INDIRECT VISUAL IMPACT ASSESSMENT SURVEY FOR THE PROPOSED PIPELINE SAFETY AND RELIABILITY PROJECT, SAN DIEGO COUNTY, CALIFORNIA	ASM AFFILIATES, INC.	37-017807, 37-037787, 37-037788, 37-037789, 37-037790
SD-17745	NADB-R - 1137745	2018	SMITH, BRIAN F., TRACY A. STROPES, and J.R.K. STROPES	AN ARCHAEOLOGICAL/HISTORICAL STUDY FOR THE CITRACADO BUSINESS PARK WEST PROJECT, CITY OF ESCONDIDO	BRIAN F. SMITH AND ASSOCIATES, INC.	37-012209

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SD-17980	NADB-R - 1137980	2018	NEAL, JESSICA and KIRBY PAGE-SCHMIT	CULTURAL RESOURCES REVIEW FOR THE SD34XC699 STEALTH TOWER PROJECT, 795 NORTH ROSE STREET (APN: 227-170-37-00) CITY OF ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA: NO HISTORIC PROPERTIES LOCATED WITHIN THE APE FOR DIRECT OR INDIRECT/VISUAL EFFECT	TRANSCON ENVIRONMENTAL	
SD-17981	NADB-R - 1137981	2019	NEAL, JESSICA, KIRBY PAGE-SCHMIT, and JOANNE C. TACTIKOS	CULTURAL RESOURCES REVIEW FOR THE SD34XC699 STEALTH TOWER PROJECT, 795 NORTH ROSE STREET, ESCONDIDO, SAN DIEGO COUNTY, CALIFORNIA: NO HISTORIC PROPERTIES AFFECTED WITHIN THE AREA OF POTENTIAL EFFECTS FOR DIRECT OR VISUAL EFFECTS	TRANSCON ENVIRONMENTAL	
SD-18356	NADB-R - 1138356	2012	STROPES, TRACY A. and BRIAN F. SMITH	CULTURAL RESOURCES SURVEY AND EVALUATION PROGRAM FOR THE CITRACADO PARKWAY EXTENSION PROJECT, CITY OF ESCONDIDO, CALIFORNIA	BRIAN F. SMITH AND ASSOCIATES, INC.	37-008280, 37-012209
SD-18357	NADB-R - 1138357	2016	STROPES, TRACY A. and BRIAN F. SMITH	A SECTION 106 (NHPA) REPORT PREPARED IN SUPPORT OF A CLEAN WATER ACT SECTION 404 PERMIT APPLICATION FOR THE CITRACADO PARKWAY EXTENSION PROJECT, CITY OF ESCONDIDO, CALIFORNIA, SPL-2015-00121-WSZ	BRIAN F. SMITH AND ASSOCIATES, INC.	37-008280, 37-012209
SD-18415	NADB-R - 1138415	2020	SMITH, BRIAN F. and JENNIFER R.K. STROPES	HISTORIC STRUCTURE ASSESSMENT FOR THE PALOMAR HEALTH DOWNTOWN CAMPUS AND MEDICAL OFFICES, ESCONDIDO, CALIFORNIA (APNS 229-442-01 TO -04 AND -18, 229-450-05 AND -06, 230-163-01 TO -05, AND 760-169-27)	BRIAN F. SMITH AND ASSOCIATES, INC.	

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-000153	CA-SDI-000153						SD-00433, SD-04301, SD-04639, SD-04719, SD-11977, SD-14666
P-37-000154	CA-SDI-000154						SD-00433, SD-00636, SD-00757, SD-04301, SD-04719
P-37-001035	CA-SDI-001035						SD-00433, SD-04301, SD-04719, SD-14666
P-37-001037	CA-SDI-001037						
P-37-005501	CA-SDI-005501						SD-00491, SD-00636, SD-00757, SD-04301, SD-04719, SD-11977
P-37-005502	CA-SDI-005502						SD-00491, SD-00636, SD-00757, SD-04301, SD-04719, SD-11977
P-37-005503	CA-SDI-005503						SD-00491, SD-00636, SD-00757, SD-04301, SD-04719, SD-11977, SD-14666
P-37-007871	CA-SDI-007871						SD-00636, SD-00757, SD-01407, SD-04719, SD-11977
P-37-008280	CA-SDI-008280						SD-00636, SD-00757, SD-01407, SD-02342, SD-02346, SD-02389, SD-02459, SD-03630, SD-04719, SD-11977, SD-13626, SD-16451, SD-18356, SD-18357

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-008305	CA-SDI-008305						SD-00636, SD-00757, SD-01887, SD-11977
P-37-010744	CA-SDI-010744						
P-37-012209	CA-SDI-012209						SD-02459, SD-11977, SD-13626, SD-17745, SD-18356, SD-18357
P-37-012460	CA-SDI-012460						SD-02459, SD-11977
P-37-012461	CA-SDI-012461						SD-02459, SD-11977, SD-13626
P-37-012528	CA-SDI-012528						SD-05337
P-37-012529	CA-SDI-012529						
P-37-012532	CA-SDI-012532						
P-37-012601	CA-SDI-012601						SD-02341, SD-11977
P-37-015577							SD-14771
P-37-017512	CA-SDI-015351	Other - HG-S-2				1999 (Tierra Environmental)	SD-03608, SD-11977
P-37-017513	CA-SDI-015352	Other - HG-S-3				1999 (Tierra Environmental)	SD-03608, SD-11977
P-37-017514		Other - HG-I-1				1999 (Tierra Environmental)	SD-03608, SD-11977
P-37-017515		Other - HG-I-2				1999 (Tierra Environmental)	SD-03608, SD-11977
P-37-017516		Other - HG-S-5				1999 (Tierra Environmental)	SD-03608, SD-11977
P-37-017517		Other - HG-S-4				1999 (Tierra Environmental)	SD-03608, SD-11977
P-37-017518		Other - HG-S-1				1999 (Tierra Environmental)	SD-03608, SD-11977
P-37-017734		OHP PRN - 2025-0001-0000; Other - El Comodo Court				1999 (CHRIS)	
P-37-017735		OHP PRN - 2025-0002-0000				1999 (CHRIS)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-017736		OHP PRN - 2025-0003-0000				1999 (CHRIS)	
P-37-017737		OHP PRN - 2025-0004-0000				1999 (CHRIS)	
P-37-017738		OHP PRN - 2025-0005-0000				1999 (CHRIS)	
P-37-017739		OHP PRN - 2025-0006-0000				1999 (CHRIS)	
P-37-017740		OHP PRN - 2025-0007-0000				1999 (CHRIS)	
P-37-017741		OHP PRN - 2025-0008-0000				1999 (CHRIS)	
P-37-017742		OHP PRN - 2025-0009-0000				1999 (CHRIS)	
P-37-017743		OHP PRN - 2025-0010-0000				1999 (CHRIS)	
P-37-017744		OHP PRN - 2025-0011-0000				1999 (CHRIS)	
P-37-017745		OHP PRN - 2025-0012-0000				1999 (CHRIS)	
P-37-017746		OHP PRN - 2025-0013-0000				1999 (CHRIS)	
P-37-017747		OHP PRN - 2025-0014-0000				1999 (CHRIS)	
P-37-017748		OHP PRN - 2025-0015-0000				1999 (CHRIS)	
P-37-017749		OHP PRN - 2025-0016-0000				1999 (CHRIS)	
P-37-017750		OHP PRN - 2025-0017-0000				1999 (CHRIS)	
P-37-017751		OHP PRN - 2025-0018-0000				1999 (CHRIS)	
P-37-017752		OHP PRN - 2025-0018-0000				1999 (CHRIS)	
P-37-017753		OHP PRN - 2025-0020-0000				1999 (CHRIS)	
P-37-017754		OHP PRN - 2025-0021-0000				1999 (CHRIS)	
P-37-017755		OHP PRN - 2025-0022-0000				1999 (CHRIS)	
P-37-017756		OHP PRN - 2025-0023-0000				1999 (CHRIS)	
P-37-017757		OHP PRN - 2025-0024-0000				1999 (CHRIS)	
P-37-017758		OHP PRN - 2025-0025-0000				1999 (CHRIS)	
P-37-017759		OHP PRN - 2025-0026-0000				1999 (CHRIS)	
P-37-017760		OHP PRN - 2025-0027-0000				1999 (CHRIS)	
P-37-017761		OHP PRN - 2025-0028-0000				1999 (CHRIS)	
P-37-017762		OHP PRN - 2025-0029-0000				1999 (CHRIS)	
P-37-017763		OHP PRN - 2025-0030-0000				1999 (CHRIS)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-017764		OHP PRN - 2025-0031-0000				1999 (CHRIS)	
P-37-017765		OHP PRN - 2025-0032-0000				1999 (CHRIS)	
P-37-017766		OHP PRN - 2025-0033-0000				1999 (CHRIS)	
P-37-017767		OHP PRN - 2025-0034-0000				1999 (CHRIS)	
P-37-017768		OHP PRN - 2025-0035-0000				1999 (CHRIS)	
P-37-017769		OHP PRN - 2025-0036-0000				1999 (CHRIS)	
P-37-017770		OHP PRN - 2025-0037-0000				1999 (CHRIS)	
P-37-017771		OHP PRN - 2025-0038-0000				1999 (CHRIS)	
P-37-017772		OHP PRN - 2025-0039-0001				1999 (CHRIS)	
P-37-017773		OHP PRN - 2025-0040-0000				1999 (CHRIS)	
P-37-017774		OHP PRN - 2025-0042-0000				1999 (CHRIS)	
P-37-017775		OHP PRN - 2025-0043-0000				1999 (CHRIS)	
P-37-017776		OHP PRN - 2025-0044-0000				1999 (CHRIS)	SD-16763
P-37-017777		OHP PRN - 2025-0045-0000				1999 (CHRIS)	SD-16763
P-37-017778		OHP PRN - 2025-0046-0000				1999 (CHRIS)	
P-37-017779		OHP PRN - 2025-0047-0000				1999 (CHRIS)	
P-37-017780		OHP PRN - 2025-0048-0000				1999 (CHRIS)	
P-37-017781		OHP PRN - 2025-0049-0000				1999 (CHRIS)	
P-37-017782		OHP PRN - 2025-0050-0000; Other - Thomas House				1999 (CHRIS)	
P-37-017783		OHP PRN - 2025-0051-0000				1999 (CHRIS)	
P-37-017784		OHP PRN - 2025-0052-0000				1999 (CHRIS)	
P-37-017785		OHP PRN - 2025-0053-0000				1999 (CHRIS)	
P-37-017786		OHP PRN - 2025-0054-0000				1999 (CHRIS)	
P-37-017787		OHP PRN - 2025-0055-0000				1999 (CHRIS)	
P-37-017788		OHP PRN - 2025-0056-0000				1999 (CHRIS)	
P-37-017789		OHP PRN - 2025-0057-0000				1999 (CHRIS)	
P-37-017790		OHP PRN - 2025-0058-0000; Other - Episcopal Social Hall				1999 (CHRIS)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-017791		OHP PRN - 2025-0059-0000				1999 (CHRIS)	
P-37-017792		OHP PRN - 2025-0060-0000				1999 (CHRIS)	
P-37-017793		OHP PRN - 2025-0061-0000				1999 (CHRIS)	
P-37-017794		OHP PRN - 2025-0062-0000				1999 (CHRIS)	
P-37-017796		OHP PRN - 2025-0064-0000				1999 (CHRIS)	
P-37-017797		OHP PRN - 2025-0065-0000				1999 (CHRIS)	
P-37-017798		OHP PRN - 2025-0066-0000				1999 (CHRIS)	
P-37-017799		OHP PRN - 2025-0067-0000				1999 (CHRIS)	
P-37-017800		OHP PRN - 2025-0068-0000				1999 (CHRIS)	
P-37-017801		OHP PRN - 2025-0069-0000				1999 (CHRIS)	
P-37-017802		OHP PRN - 2025-0070-0000				1999 (CHRIS)	
P-37-017803		OHP PRN - 2025-0071-0000				1999 (CHRIS)	
P-37-017804		OHP PRN - 2025-0072-0000				1999 (CHRIS)	
P-37-017805		OHP PRN - 2025-0073-0000				1999 (CHRIS)	
P-37-017806		OHP PRN - 2025-0074-0000				1999 (CHRIS)	
P-37-017807		OHP PRN - 2025-0075-0000				1999 (CHRIS)	SD-17577, SD-17578
P-37-017808		OHP PRN - 2025-0076-0000				1999 (CHRIS)	
P-37-017809		OHP PRN - 2025-0077-0000				1999 (CHRIS)	
P-37-017810		OHP PRN - 2025-0078-0000				1999 (CHRIS)	
P-37-017811		OHP PRN - 2025-0079-0000				1999 (CHRIS)	
P-37-017814		OHP PRN - 2025-0080-0000				1999 (CHRIS)	
P-37-017816		OHP PRN - 2025-0081-0000				1999 (CHRIS)	
P-37-017817		OHP PRN - 2025-0082-0000				1999 (CHRIS)	
P-37-017838		OHP PRN - 2025-0083-0000				1999 (CHRIS)	
P-37-017839		OHP PRN - 2025-0084-0000; Other - Barnhart House				1999 (CHRIS)	
P-37-017840		OHP PRN - 2025-0085-0000; Other - Buell House				1999 (CHRIS)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-017841		OHP PRN - 2025-0086-0000; Other - Ting House				1999 (CHRIS)	
P-37-017842		OHP PRN - 2025-0087-0000				1999 (CHRIS)	
P-37-017843		OHP PRN - 2025-0088-0000				1999 (CHRIS)	
P-37-017844		OHP PRN - 2025-0089-0000				1999 (CHRIS)	
P-37-017845		OHP PRN - 2025-0090-0000				1999 (CHRIS)	
P-37-017846		OHP PRN - 2025-0091-0000				1999 (CHRIS)	
P-37-017847		OHP PRN - 2025-0092-0000; Other - Prichett House				1999 (CHRIS)	
P-37-017848		OHP PRN - 2025-0093-0000				1999 (CHRIS)	
P-37-017849		OHP PRN - 2025-0094-0000				1999 (CHRIS)	
P-37-017850		OHP PRN - 2025-0095-0000				1999 (CHRIS)	
P-37-017865		OHP PRN - 2025-0110-0000				1999 (CHRIS)	
P-37-017866		OHP PRN - 2025-0111-0000				1999 (CHRIS)	
P-37-017867		OHP PRN - 2025-0112-0000				1999 (CHRIS)	
P-37-017868		OHP PRN - 2025-0113-0000				1999 (CHRIS)	
P-37-017869		OHP PRN - 2025-0114-0000				1999 (CHRIS)	
P-37-017870		OHP PRN - 2025-0115-0000				1999 (CHRIS)	
P-37-017871		OHP PRN - 2025-0116-0000				1999 (CHRIS)	
P-37-017872		OHP PRN - 2025-0117-0000				1999 (CHRIS)	
P-37-017873		OHP PRN - 2025-0118-0000				1999 (CHRIS)	
P-37-017875		OHP PRN - 2025-0120-0000				1999 (CHRIS)	
P-37-017876		OHP PRN - 2025-0121-0000				1999 (CHRIS)	
P-37-017877		OHP PRN - 2025-0122-0000				1999 (CHRIS)	
P-37-017878		OHP PRN - 2025-0123-0001				1999 (CHRIS)	
P-37-018478		OHP PRN - 2025-0361-0000; Other - 1266 West 9th Avenue				2000 (CHRIS)	
P-37-018479		OHP PRN - 2025-0362-0000; Other - 1284 West 9th Avenue				2000 (CHRIS)	
P-37-018560		OHP PRN - 2025-0444-0000; Other - 1912 West 11th Avenue				2000 (CHRIS)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-018561		OHP PRN - 2025-0445-0000; Other - 1924 West 11th Avenue				2000 (CHRIS)	
P-37-018562		OHP PRN - 2025-00446-0000; Other - 1926 West 11th Avenue				2000 (CHRIS)	
P-37-018622		OHP PRN - 2025-0041-0000; Other - 209-227 West 3rd Avenue				2000 (CHRIS)	
P-37-018685		Other - 427 N. Beech St.				2000 (CHRIS)	
P-37-018687		Other - 300 Block of N. Broadway				2000 (CHRIS)	
P-37-018688		Other - 321 N. Broadway- Escondido Library				2000 (CHRIS)	
P-37-018689		Other - 312 N. Broadway- Pomeroy House				2000 (CHRIS)	
P-37-018690		Other - 321 N. Broadway-Penner barn				2000 (CHRIS)	
P-37-018691		Other - 321 N. Broadway-Civic Stage				2000 (CHRIS)	
P-37-018692		Other - 321 N. Broadway- Restrooms				2000 (CHRIS)	
P-37-018693		Other - 338 N. Broadway(building behind)				2000 (CHRIS)	
P-37-018694		Other - 550 N. Broadway				2000 (CHRIS)	
P-37-018695		Other - 551-555 N. Broadway				2000 (CHRIS)	
P-37-018696		Other - 601 N. Broadway				2000 (CHRIS)	
P-37-018697		Other - 641 N. Broadway				2000 (CHRIS)	
P-37-018698		Other - 639 N. Broadway				2000 (CHRIS)	
P-37-018699		Other - 643 N. Broadway				2000 (CHRIS)	
P-37-018700		Other - 651 N. Broadway				2000 (CHRIS)	
P-37-018701		Other - 729 N. Broadway				2000 (CHRIS)	
P-37-018702		Other - 852 N. Broadway				2000 (CHRIS)	
P-37-018703		Other - 868 1/2 N. Broadway				2000 (CHRIS)	
P-37-018707		Other - 235 S. Broadway				2000 (CHRIS)	
P-37-018708		Other - 240 S. Broadway				2000 (CHRIS)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-018724		Other - 128 N. Cedar St.				2000 (CHRIS)	
P-37-018725		Other - 311 S. Cedar St.				2000 (CHRIS)	
P-37-018726		Other - 321 N. Cedar St.				2000 (CHRIS)	
P-37-018734		Other - 114 E. Clark St.				2000 (CHRIS)	
P-37-018735		Other - 204 E. Clark St.				2000 (CHRIS)	
P-37-018736		Other - 221 E. Clark St.				2000 (CHRIS)	
P-37-018737		Other - 1230 Clothier Pl.				2000 (CHRIS)	
P-37-018739		Other - 593 Del Dios Rd.				2000 (CHRIS)	
P-37-018740		Other - 991 Del Dios Rd.				2000 (CHRIS)	
P-37-018741		Other - 960 Del Dios Rd.				2000 (CHRIS)	
P-37-018742		Other - 1006 Del Dios Rd.				2000 (CHRIS)	
P-37-018743		Other - 1007 Del Dios Rd.				2000 (CHRIS)	
P-37-018744		Other - 115 S. Elm St.				2000 (CHRIS)	
P-37-018754		Other - 131-133 S. Escondido Blvd				2000 (CHRIS)	
P-37-018755		Other - 331 S. Escondido Blvd				2000 (CHRIS)	
P-37-018756		Other - 442 S. Escondido Blvd				2000 (CHRIS)	
P-37-019327		OHP PRN - 2025-0592-0000; Other - 503 N. Fig St.				2002	
P-37-019328		OHP PRN - 2025-0593-0000; Other - 503 1/2 N. Fig St.				2002	
P-37-019329		OHP PRN - 2025-0594-0000; Other - 505 N. Fig St.				2002	
P-37-019330		OHP PRN - 2025-0595-0000; Other - 643 N. Fig St.				2002	
P-37-019331		OHP PRN - 2025-0596-0000; Other - 244 S. Fig St.				2002	
P-37-019332		OHP PRN - 2025-0597-0000; Other - 237 S. Fig St.				2002	
P-37-019333		OHP PRN - 2025-0598-0000; Other - 817 N. Fig St.				2002	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019334		OHP PRN - 2025-0599-0000; Other - 825 N. Fig St.				2002	
P-37-019336		OHP PRN - 2025-0601-0000; Other - 925 Grand Ct.				2002	
P-37-019337		OHP PRN - 2025-0602-0000; Other - 625 N. Grape St.				2002	
P-37-019338		OHP PRN - 2025-0603-0000; Other - 633 N. Grape St.				2002	
P-37-019339		OHP PRN - 2025-0604-0000; Other - 643 N. Grape St.				2002	
P-37-019340		OHP PRN - 2025-0605-0000; Other - 675-677 N. Grape St.				2002	
P-37-019341		OHP PRN - 2025-0606-0000; Other - 683 N. Grape St.				2002	
P-37-019342		OHP PRN - 2025-0607-0000; Other - 691 N. Grape St.				2002	
P-37-019343		OHP PRN - 2025-0608-0000; Other - 125 S. Grape St.				2002	
P-37-019344		OHP PRN - 2025-0609-0000; Other - 145 S. Grape St.				2002	
P-37-019348		OHP PRN - 2025-0613-0000; Other - 102, 106, &110 W. Grand Ave.				2002	
P-37-019349		OHP PRN - 2025-0614-0000; Other - 113 W. Grand Ave.				2002	
P-37-019350		OHP PRN - 2025-0615-0000; Other - 115 W. Grand Ave.				2002	
P-37-019351		OHP PRN - 2025-0616-0000; Other - 117 W. Grand Ave.				2002	
P-37-019352		OHP PRN - 2025-0617-0000; Other - 121-123 W. Grand Ave.				2002	
P-37-019353		OHP PRN - 2025-0618-0000; Other - 125-127 W. Grand Ave.				2002	
P-37-019354		OHP PRN - 2025-0619-0000; Other - 126, 130, &132 W. Grand Ave.				2002	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019355		OHP PRN - 2025-0620-0000; Other - 129 W. Grand Ave.				2002	
P-37-019356		OHP PRN - 2025-0621-0000; Other - 135 W. Grand Ave.				2002	
P-37-019357		OHP PRN - 2025-0622-0000; Other - 136 W. Grand Ave.				2002	
P-37-019358		OHP PRN - 2025-0623-0000; Other - 138 &142 W. Grand Ave.				2002	
P-37-019359		OHP PRN - 2025-0624-0000; Other - 143-145 W. Grand Ave.				2002	
P-37-019360		OHP PRN - 2025-0625-0000; Other - 148 &152 W. Grand Ave.				2002	
P-37-019361		OHP PRN - 2025-0626-0000; Other - 154&156 W. Grand Ave.				2002	
P-37-019362		OHP PRN - 2025-0627-0000; Other - 237 W. Grand Ave.				2002	
P-37-019363		OHP PRN - 2025-0628-0000; Other - 323 W. Grand Ave.				2002	
P-37-019364		OHP PRN - 2025-0629-0000; Other - 345 W. Grand Ave.				2002	
P-37-019365		OHP PRN - 2025-0630-0000; Other - 360 W. Grand Ave.				2002	
P-37-019366		OHP PRN - 2025-0631-0000; Other - 431 W. Grand Ave.				2002	
P-37-019367		OHP PRN - 2025-0632-0000; Other - 431 W. Grand Ave.(Rear)				2002	
P-37-019368		OHP PRN - 2025-0633-0000; Other - 562 W. Grand Ave.				2002	
P-37-019369		OHP PRN - 2025-0634-0000; Other - 665-675 W. Grand Ave.				2002	
P-37-019370		OHP PRN - 2025-0635-0000; Other - 701 W. Grand Ave.				2002	
P-37-019371		OHP PRN - 2025-0636-0000; Other - 856 W. Grand Ave. (NE corner)				2002	
P-37-019372		OHP PRN - 2025-0637-0000; Other - 869 W. Grand Ave.				2002	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019373		OHP PRN - 2025-0638-0000; Other - 101 E. Grand Ave.				2002	
P-37-019374		OHP PRN - 2025-0639-0000; Other - 105 E. Grand Ave.				2002	
P-37-019375		OHP PRN - 2025-0640-0000; Other - 113 E. Grand Ave.				2002	
P-37-019376		OHP PRN - 2025-0641-0000; Other - 119 & 121 E. Grand Ave.				2002	
P-37-019377		OHP PRN - 2025-0642-0000; Other - 122 E. Grand Ave.				2002	
P-37-019378		OHP PRN - 2025-0643-0000; Other - 125 E. Grand Ave.				2002	
P-37-019379		OHP PRN - 2025-0644-0000; Other - 129 E. Grand Ave.				2002	
P-37-019380		OHP PRN - 2025-0645-0000; Other - 130 E. Grand Ave.				2002	
P-37-019381		OHP PRN - 2025-0646-0000; Other - 132, 136 & 138 E. Grand Ave.				2002	
P-37-019382		OHP PRN - 2025-0647-0000; Other - 135 E. Grand Ave.				2002	
P-37-019383		OHP PRN - 2025-0648-0000; Other - 140 and 142 E. Grand Ave.				2002	
P-37-019384		OHP PRN - 2025-0649-0000; Other - 141 E. Grand Ave.				2002	
P-37-019385		OHP PRN - 2025-0650-0000; Other - 146-156 E. Grand Ave.				2002	
P-37-019386		OHP PRN - 2025-0651-0000; Other - 158 E. Grand Ave.				2002	
P-37-019387		OHP PRN - 2025-0652-0000; Other - 147 E. Grand Ave.				2002	
P-37-019388		OHP PRN - 2025-0653-0000; Other - 153 E. Grand Ave.				2002	
P-37-019389		OHP PRN - 2025-0654-0000; Other - 155 E. Grand Ave.				2002	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019390		OHP PRN - 2025-0655-0000; Other - 157 E. Grand Ave.				2002	
P-37-019391		OHP PRN - 2025-0656-0000; Other - 200 E. Grand Ave.				2002	
P-37-019392		OHP PRN - 2025-0657-0000; Other - 214 E. Grand Ave.				2002	
P-37-019393		OHP PRN - 2025-0658-0000; Other - 215 E. Grand Ave.				2002	
P-37-019394		OHP PRN - 2025-0659-0000; Other - 217 E. Grand Ave.				2002	
P-37-019395		OHP PRN - 2025-0660-0000; Other - 218 E. Grand Ave.				2002	
P-37-019396		OHP PRN - 2025-0662-0000; Other - 224 E. Grand Ave.				2002	
P-37-019397		OHP PRN - 2025-0662-0000; Other - 221 E. Grand Ave.				2002	
P-37-019398		OHP PRN - 2025-0663-0000; Other - 227 E. Grand Ave.				2002	
P-37-019399		OHP PRN - 2025-0664-0000; Other - 231 E. Grand Ave.				2002	
P-37-019400		OHP PRN - 2025-0665-0000; Other - 233 E. Grand Ave.				2002	
P-37-019401		OHP PRN - 2025-0666-0000; Other - 235 E. Grand Ave.				2002	
P-37-019402		OHP PRN - 2025-0667-0000; Other - 237 E. Grand Ave.				2002	
P-37-019403		OHP PRN - 2025-0668-0000; Other - 240 E. Grand Ave.				2002	
P-37-019404		OHP PRN - 2025-0669-0000; Other - 241 E. Grand Ave.				2002	
P-37-019405		OHP PRN - 2050-0670-0000; Other - 249 E. Grand Ave.				2002	
P-37-019406		OHP PRN - 2025-0671-0000; Other - 254 E. Grand Ave.				2002	
P-37-019407		OHP PRN - 2025-0672-0000; Other - 262 E. Grand Ave.				2002	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019408		OHP PRN - 2025-0673-0000; Other - 301 E. Grand Ave.				2002	
P-37-019409		OHP PRN - 2025-0674-0000; Other - 309 E. Grand Ave.				2002	
P-37-019410		OHP PRN - 2025-0675-0000; Other - 317 E. Grand Ave.				2002	
P-37-019411		OHP PRN - 2025-0676-0000; Other - 326 E. Grand Ave.				2002	
P-37-019412		OHP PRN - 2025-0677-0000; Other - 330 E. Grand Ave.				2002	
P-37-019413		OHP PRN - 2025-0678-0000; Other - 333 E. Grand Ave.				2002	
P-37-019414		OHP PRN - 2025-0679-0000; Other - 336 E. Grand Ave.				2002	
P-37-019415		OHP PRN - 2025-0680-0000; Other - 344 E. Grand Ave.				2002	
P-37-019416		OHP PRN - 2025-0681-0000; Other - 348 E. Grand Ave.				2002	
P-37-019417		OHP PRN - 2025-0682-0000; Other - 354, 358,& 364 E. Grand Ave.				2002	
P-37-019418		OHP PRN - 2025-0683-0000; Other - 404 E. Grand Ave.				2002	
P-37-019419		OHP PRN - 2025-0684-0000; Other - 418 E. Grand Ave.				2002	
P-37-019420		OHP PRN - 2025-0685-0000; Other - 543 E. Grand Ave.				2002	
P-37-019421		OHP PRN - 2025-0686-0000; Other - 613 E. Grand Ave.				2002	
P-37-019422		OHP PRN - 2025-0687-0000; Other - 718 E. Grand Ave.				2002	
P-37-019423		OHP PRN - 2025-0688-0000; Other - 726 E. Grand Ave.				2002	
P-37-019424		OHP PRN - 2025-0689-0000; Other - 745 E. Grand Ave.				2002	
P-37-019425		OHP PRN - 2025-0690-0000; Other - 810 E. Grand Ave.				2002	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019426		OHP PRN - 2025-0691-0000; Other - 818 E. Grand Ave.				2002	
P-37-019427		OHP PRN - 2025-0692-0000; Other - 827 E. Grand Ave.				2002	
P-37-019428		OHP PRN - 2025-0693-0000; Other - 842 E. Grand Ave.				2002	
P-37-019429		OHP PRN - 2025-0694-0000; Other - 936 E. Grand Ave.				2002	
P-37-019430		OHP PRN - 2025-0695-0000; Other - 942 E. Grand Ave.				2002	
P-37-019431		OHP PRN - 2025-0696-0000; Other - 958 E. Grand Ave.				2002	
P-37-019432		OHP PRN - 2025-0697-0000; Other - 1002 E. Grand Ave.				2002	
P-37-019433		OHP PRN - 2025-0698-0000; Other - 1127 E. Grand Ave.				2002	
P-37-019434		OHP PRN - 2025-0699-0000; Other - 1225 E. Grand Ave.				2002	
P-37-019435		OHP PRN - 2025-0700-0000; Other - 1294 E. Grand Ave.				2002	
P-37-019436		OHP PRN - 2025-0701-0000; Other - 559 N. Hale Ave.				2002	
P-37-019437		OHP PRN - 2025-0702-0000; Other - 1555 S. Hale Ave.				2002	
P-37-019438		OHP PRN - 2025-0703-0000; Other - 958 S. Hale Ave.				2002	
P-37-019439		OHP PRN - 2025-0704-0000; Other - 1004 S. Hale Ave.				2002	
P-37-019440		OHP PRN - 2025-0705-0000; Other - 412 N. Hickory St.				2002	
P-37-019441		OHP PRN - 2025-0706-0000; Other - 224 South Hickory				2002	
P-37-019442		OHP PRN - 2025-0707-0000; Other - 225 South Hickory				2002	
P-37-019443		OHP PRN - 2025-0708-0000; Other - 225 South Hickory				2002	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019444		OHP PRN - 2025-0709-0000; Other - 225 South Hickory				2002	
P-37-019445		OHP PRN - 2025-0710-0000; Other - 225 South Hickory				2002	
P-37-019446		OHP PRN - 2025-0711-0000; Other - 225 South Hickory				2002	
P-37-019447		OHP PRN - 2025-0712-0000; Other - 412-418 South Hickory Street				2002	
P-37-019454		OHP PRN - 2025-0719-0000; Other - 701 Howard Ave.				2002	
P-37-019455		OHP PRN - 2025-0720-0000; Other - 151 Howell Heights Drive				2002	
P-37-019456		OHP PRN - 2025-0721-0000; Other - 178 Howell Heights Drive				2002	
P-37-019458		OHP PRN - 2025-0723-0000; Other - 113 North Ivy				2002	
P-37-019459		OHP PRN - 2025-0724-0000; Other - 319,321,323,325, South Ivy				2002	
P-37-019460		OHP PRN - 2025-0725-0000; Other - 423 Ivy Street				2002	
P-37-019463		OHP PRN - 2025-0728-0000; Other - 112 North Juniper Street				2002	
P-37-019464		OHP PRN - 2025-0729-0000; Other - 114 North Juniper				2002	
P-37-019465		OHP PRN - 2025-0730-0000; Other - 116 North Juniper				2002	
P-37-019466		OHP PRN - 2025-0731-0000; Other - 118 North Juniper Street				2002	
P-37-019467		OHP PRN - 2025-0732-0000; Other - 350 North Juniper Street				2002	
P-37-019468		OHP PRN - 2025-0733-0000; Other - 355 North Juniper				2002	
P-37-019469		OHP PRN - 2025-0734-0000; Other - 405 North Juniper				2002	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019470		OHP PRN - 2025-0735-0000; Other - 409 North Juniper				2002	
P-37-019471		OHP PRN - 2025-0736-0000; Other - 411 North Juniper				2002	
P-37-019472		OHP PRN - 2025-0737-0000; Other - 421 North Juniper				2002	
P-37-019473		OHP PRN - 2025-0738-0000; Other - 642 North Juniper				2002	
P-37-019474		OHP PRN - 2025-0739-0000; Other - 660 North Juniper Street				2002	
P-37-019475		OHP PRN - 2025-0740-0000; Other - 117 South Juniper				2002	
P-37-019476		OHP PRN - 2025-0741-0000; Other - 234 South Juniper				2002	
P-37-019477		OHP PRN - 2025-0742-0000; Other - 240 South Juniper Street				2002	
P-37-019509		OHP PRN - 2025-0774-0000; Other - 125 North Kalmia				2002 (Cotton Associates)	
P-37-019510		OHP PRN - 2025-0775-0000; Other - 219 North Kalmia				2002 (Cotton Associates)	
P-37-019511		OHP PRN - 2025-0776-0000; Other - 122-126 South Kalmia				2002 (Cotton Associates)	
P-37-019512		OHP PRN - 2025-0777-0000; Other - 342 South Kalmia				2002 (Cotton Associates)	
P-37-019513		OHP PRN - 2025-0778-0000; Other - 336 and 338 South Kalmia				2002 (Cotton Associates)	
P-37-019526		OHP PRN - 2025-0791-0000; Other - Rear 610 Metcalf Street				2002 (Cotton Associates)	
P-37-019527		OHP PRN - 2025-0792-0000; Other - 646 Metcalf Street				2002 (Cotton Associates)	
P-37-019528		OHP PRN - 2025-0793-0000; Other - 775 Metcalf Street				2002 (Cotton Associates)	
P-37-019530		OHP PRN - 2025-0795-0000; Other - 227 South Maple				2002 (Cotton Associates)	
P-37-019531		OHP PRN - 2025-0796-0000; Other - 239 South Maple				2002 (Cotton Associates)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019532		OHP PRN - 2025-0797-0000; Other - 240 South Maple Street				2002 (Cotton Associates)	
P-37-019533		OHP PRN - 2025-0798-0000; Other - 302 and 304 South Maple Street				2002 (Cotton Associates)	
P-37-019534		OHP PRN - 2025-0799-0000; Other - 306 South Maple Street				2002 (Cotton Associates)	
P-37-019535		OHP PRN - 2025-0800-0000; Other - 308 and 310 South Maple Street				2002 (Cotton Associates)	
P-37-019557		OHP PRN - 2025-0822-0000; Other - 166 West Mission Ave				2002 (Cotton Associates)	
P-37-019568		OHP PRN - 2025-0833-0000; Other - 351 East Mission Ave				2002 (Cotton Associates)	
P-37-019569		OHP PRN - 2025-0834-0000; Other - 407 East Mission				2002 (Cotton Associates)	
P-37-019570		OHP PRN - 2025-0835-0000; Other - 415 East Mission				2002 (Cotton Associates)	
P-37-019571		OHP PRN - 2025-0836-0000; Other - 449 East Mission				2002 (Cotton Associates)	
P-37-019572		OHP PRN - 2025-0837-0000; Other - 450 East Mission Ave				2002 (Cotton Associates)	
P-37-019573		OHP PRN - 2025-0838-0000; Other - 2031 East Mission				2002 (Cotton Associates)	
P-37-019577		OHP PRN - 2025-0842-0000; Other - 829 East Ohio				2002 (Cotton Associates)	
P-37-019578		OHP PRN - 2025-0843-0000; Other - 829 East Ohio(garage apartment)				2002 (Cotton Associates)	
P-37-019579		OHP PRN - 2025-0844-0000; Other - 848 East Ohio Street				2002 (Cotton Associates)	
P-37-019580		OHP PRN - 2025-0845-0000; Other - 1143-1145 East Ohio Ave. (alley house)				2002 (Cotton Associates)	
P-37-019594		OHP PRN - 2025-0859-0000; Other - 600 Park Place				2002 (Cotton Associates)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019595		OHP PRN - 2025-0860-0000; Other - 709 Park Place				2002 (Cotton Associates)	
P-37-019596		OHP PRN - 2025-0861-0000; Other - 713 Park Place				2002 (Cotton Associates)	
P-37-019597		OHP PRN - 2025-0862-0000; Other - 716 Park Place				2002 (Cotton Associates)	
P-37-019598		OHP PRN - 2025-0863-0000; Other - 717 Park Place				2002 (Cotton Associates)	
P-37-019599		OHP PRN - 2025-0864-0000; Other - 727 Park Place				2002 (Cotton Associates)	
P-37-019600		OHP PRN - 2025-0865-0000; Other - 739 Park Place				2002 (Cotton Associates)	
P-37-019601		OHP PRN - 2025-0866-0000; Other - 749 Park Place				2002 (Cotton Associates)	
P-37-019602		OHP PRN - 2025-0867-0000; Other - 753 Park Place				2002 (Cotton Associates)	
P-37-019603		OHP PRN - 2025-0868-0000; Other - 756 Park Place				2002 (Cotton Associates)	
P-37-019604		OHP PRN - 2025-0869-0000; Other - 202 Pennsylvania Place				2002 (Cotton Associates)	
P-37-019605		OHP PRN - 2025-0870-0000; Other - 336,370,402,404,406 E. Pennsylvania Ave/				2002 (Cotton Associates)	
P-37-019606		OHP PRN - 2025-0871-0000; Other - 410 East Pennsylvania Ave.				2002 (Cotton Associates)	
P-37-019607		OHP PRN - 2025-0872-0000; Other - 426 East Pennsylvania Ave				2002 (Cotton Associates)	
P-37-019608		OHP PRN - 2025-0873-0000; Other - 436 East Pennsylvania Ave.				2002 (Cotton Associates)	
P-37-019609		OHP PRN - 2025-0874-0000; Other - 466 East Pennsylvania Ave				2002 (Cotton Associates)	
P-37-019610		OHP PRN - 2025-0875-0000; Other - 418 East Pennsylvania Ave.				2002 (Cotton Associates)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019611		OHP PRN - 2025-0876-0000; Other - 719 East Pennsylvania Ave.				2002 (Cotton Associates)	
P-37-019612		OHP PRN - 2025-0877-0000; Other - 1018 East Pennsylvania Ave.				2002 (Cotton Associates)	
P-37-019613		OHP PRN - 2025-0878-0000; Other - 1035 East Pennsylvania Ave.				2002 (Cotton Associates)	
P-37-019614		OHP PRN - 2025-0879-0000; Other - 1101 East Pennsylvania Ave.				2002 (Cotton Associates)	
P-37-019615		OHP PRN - 2025-0880-0000; Other - 1101 1/2 East Pennsylvania Ave.				2002 (Cotton Associates)	
P-37-019616		OHP PRN - 2025-0881-0000; Other - 1110 East Pennsylvania Ave.				2002 (Cotton Associates)	
P-37-019618		OHP PRN - 2025-0883-0000; Other - 534 North Quince Street				2002 (Cotton Associates)	
P-37-019619		OHP PRN - 2025-0884-0000; Other - 538 North Quince Street				2002 (Cotton Associates)	
P-37-019620		OHP PRN - 2025-0885-0000; Other - 546 North Quince Street				2002 (Cotton Associates)	
P-37-019621		OHP PRN - 2025-0886-0000; Other - 660 North Quince Street				2002 (Cotton Associates)	
P-37-019626		OHP PRN - 2025-0891-0000; Other - 135 South Quince Street				2002 (Cotton Associates)	
P-37-019627		OHP PRN - 2025-0892-0000; Other - 310 South Quince Street				2002 (Cotton Associates)	
P-37-019632		OHP PRN - 2025-0897-0000; Other - 634 N. Rock Springs Road				2002 (Cotton Associates)	
P-37-019633		OHP PRN - 2025-0898-0000; Other - 650 N. Rock Springs Road				2002 (Cotton Associates)	
P-37-019634		OHP PRN - 2025-0899-0000; Other - 704-705 N. Rock Springs Road				2002 (Cotton Associates)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019636		OHP PRN - 2025-0901-0000; Other - 449 S. Spruce Street				2002 (Cotton Associates)	
P-37-019637		OHP PRN - 2025-0902-0000; Other - Behind 511 S. Spruce Street				2002 (Cotton Associates)	
P-37-019638		OHP PRN - 2025-0903-0000; Other - 531 S. Spruce Street				2002 (Cotton Associates)	
P-37-019644		OHP PRN - 2025-0909-0000; Other - 100 North Tulip Street				2002 (Cotton Associates)	
P-37-019645		OHP PRN - 2025-0910-0000; Other - 116 North Tulip Street				2002 (Cotton Associates)	
P-37-019646		OHP PRN - 2025-0911-0000; Other - 121 North Tulip Street				2002 (Cotton Associates)	
P-37-019647		OHP PRN - 2025-0912-0000; Other - 209 North Tulip Street				2002 (Cotton Associates)	
P-37-019648		OHP PRN - 2025-0913-0000; Other - 220 North Tulip Street				2002 (Cotton Associates)	
P-37-019649		OHP PRN - 2025-0914-0000; Other - 101 South Tulip Street				2002 (Cotton Associates)	
P-37-019650		OHP PRN - 2025-0915-0000; Other - 152 South Tulip Street				2002 (Cotton Associates)	
P-37-019651		OHP PRN - 2025-0916-0000; Other - 245 South Tulip Street				2002 (Cotton Associates)	
P-37-019652		OHP PRN - 2025-0917-0000; Other - 225 South Tulip Street				2002 (Cotton Associates)	
P-37-019653		OHP PRN - 2025-0918-0000; Other - 312 South Tulip Street				2002 (Cotton Associates)	
P-37-019654		OHP PRN - 2025-0919-0000; Other - 337 South Tulip Street				2002 (Cotton Associates)	
P-37-019655		OHP PRN - 2025-0920-0000; Other - 409 South Tulip Street				2002 (Cotton Associates)	
P-37-019666		OHP PRN - 2025-0931-0000; Other - 100 Valley Boulevard				2002 (Cotton Associates)	
P-37-019670		OHP PRN - 2025-0935-0000; Other - 100 North Valley Boulevard				2002 (Cotton Associates)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019671		OHP PRN - 2025-0936-0000; Other - 151/153 North Valley Boulevard				2002 (Cotton Associates)	
P-37-019672		OHP PRN - 2025-0937-0000; Other - 155 North Valley boulevard				2002 (Cotton Associates)	
P-37-019673		OHP PRN - 2025-0938-0000; Other - 137 West Valley Boulevard				2002 (Cotton Associates)	
P-37-019674		OHP PRN - 2025-0939-0000; Other - 142, 144, 146, &148 W. Valley Blvd.				2002 (Cotton Associates)	
P-37-019676		OHP PRN - 2025-0941-0000; Other - 1561 West Valley Parkway				2002 (Cotton Associates)	
P-37-019677		OHP PRN - 2025-0942-0000; Other - 237 East Valley Parkway				2002 (Cotton Associates)	
P-37-019678		OHP PRN - 2025-0943-0000; Other - 319 East Valley Parkway				2002 (Cotton Associates)	
P-37-019679		OHP PRN - 2025-0944-0000; Other - 433 & 435 East Valley Parkway				2002 (Cotton Associates)	
P-37-019680		OHP PRN - 2025-0945-0000; Other - 451-453 East Valley Parkway				2002 (Cotton Associates)	
P-37-019681		OHP PRN - 2025-0946-0000; Other - 1004 East Valley Parkway				2002 (Cotton Associates)	
P-37-019682		OHP PRN - 2025-0947-0000; Other - 1016 East Valley Boulevard (behind)				2002 (Cotton Associates)	
P-37-019683		OHP PRN - 2025-0948-0000; Other - 1157 East Valley Parkway (behind)				2002 (Cotton Associates)	
P-37-019687		OHP PRN - 2025-0952-0000; Other - 120 West Washington Avenue				2002 (Cotton Associates)	
P-37-019688		OHP PRN - 2025-0953-0000; Other - 140 West Washington Avenue				2002 (Cotton Associates)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019689		OHP PRN - 2025-0954-0000; Other - 144 West Washington Avenue				2002 (Cotton Associates)	
P-37-019690		OHP PRN - 2025-0955-0000; Other - 151 West Washington Avenue				2002 (Cotton Associates)	
P-37-019691		OHP PRN - 2025-0956-0000; Other - 157 & 159 West Washington Ave.				2002 (Cotton Associates)	
P-37-019692		OHP PRN - 2025-0957-0000; Other - 201 West Washington Avenue				2002 (Cotton Associates)	
P-37-019693		OHP PRN - 2025-0958-0000; Other - 518 West Washington Avenue				2002 (Cotton Associates)	
P-37-019694		OHP PRN - 2025-0959-0000; Other - 522 West Washington Avenue				2002 (Cotton Associates)	
P-37-019695		OHP PRN - 2025-0960-0000; Other - 525 West Washington Avenue				2002 (Cotton Associates)	
P-37-019696		OHP PRN - 2025-0961-0000; Other - 528 West Washington Avenue				2002 (Cotton Associates)	
P-37-019697		OHP PRN - 2025-0962-0000; Other - 532 West Washington Avenue				2002 (Cotton Associates)	
P-37-019698		OHP PRN - 2025-0963-0000; Other - 545 West Washington Avenue				2002 (Cotton Associates)	
P-37-019699		OHP PRN - 2025-0964-0000; Other - 738 West Washington Avenue				2002 (Cotton Associates)	
P-37-019700		OHP PRN - 2025-0965-0000; Other - 1100 West Washington Avenue				2002 (Cotton Associates)	
P-37-019701		OHP PRN - 2025-0966-0000; Other - 302 East Washington Avenue				2002 (Cotton Associates)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019702		OHP PRN - 2025-0967-0000; Other - 310 East Washington Avenue				2002 (Cotton Associates)	
P-37-019703		OHP PRN - 2025-0968-0000; Other - 315 East Washington Avenue				2002 (Cotton Associates)	
P-37-019704		OHP PRN - 2025-0969-0000; Other - 410 East Washington(&402 &404)				2002 (Cotton Associates)	
P-37-019705		OHP PRN - 2025-0970-0000; Other - 540 East Washington Avenue				2002 (Cotton Associates)	
P-37-019706		OHP PRN - 2025-0971-0000; Other - 550 East Washington Avenue				2002 (Cotton Associates)	
P-37-019707		OHP PRN - 2025-0972-0000; Other - 560 East Washington Avenue				2002 (Cotton Associates)	
P-37-019708		OHP PRN - 2025-0973-0000; Other - 602 East Washington Avenue				2002 (Cotton Associates)	
P-37-019709		OHP PRN - 2025-0974-0000; Other - 1289 West Washington Avenue				2002 (Cotton Associates)	
P-37-019710		OHP PRN - 2025-0975-0000; Other - 2033 East Washington Avenue				2002 (Cotton Associates)	
P-37-019713		OHP PRN - 2025-0978-0000; Other - 318 North Waverly Place				2002 (Cotton Associates)	
P-37-019714		OHP PRN - 2025-0979-0000; Other - 328 North Waverly Place				2002 (Cotton Associates)	
P-37-019715		OHP PRN - 2025-0980-0000; Other - 340 North Waverly Place				2002 (Cotton Associates)	
P-37-019716		OHP PRN - 2025-0981-0000; Other - 350 North Waverly Place				2002 (Cotton Associates)	
P-37-019717		OHP PRN - 2025-0982-0000; Other - 350 1/2 Waverly Place				2002 (Cotton Associates)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-019718		OHP PRN - 2025-0983-0000; Other - 354 North Waverly Place				2002 (Cotton Associates)	
P-37-019719		OHP PRN - 2025-0984-0000; Other - 401 North Waverly Place				2002 (Cotton Associates)	
P-37-024458		Other - SI2				2002 (Edaw)	SD-11977, SD-13626
P-37-025575	CA-SDI-016988	Other - ERTC - Temp 1				2004 (Brian F. Smith & Associates)	SD-09250, SD-11977
P-37-025925		Other - Harmony Grove-Temp 1				2004 (Brian F. Smith & Associates)	SD-11977
P-37-026360		Other - 1325 E. Grand Avenue				2005 (Tierra Environmental)	
P-37-027268	CA-SDI-017837	Other - TEMP 1				2006 (Brian F. Smith & Associates)	
P-37-027269	CA-SDI-017838	Other - TEMP 2				2006 (Brian F. Smith & Associates)	SD-11977
P-37-027270	CA-SDI-017839	Other - TEMP 3				2006 (Brian F. Smith & Associates)	SD-11977
P-37-033262		Other - Harmony Grove Equestrian Center	Building, Structure	Historic	HP33 (Farm/ranch)	2013 (Affinis)	
P-37-033269	CA-SDI-020941	Other - TEMP-W-477	Site	Prehistoric	AP16 (Other)	2013 (Brian F. Smith & Associates)	
P-37-033557		Other - SXPQ 13 Pomerado Road; Resource Name - Highway 395; Other - SXPQ-13 Historic road	Object, Site	Historic	AH07 (Roads/trails/railroad grades); HP37 (Highway/trail)	2013 (Larry Tift, ASM Affiliates, Inc.); 2015 (Kent Manchen, Matt DeCarlo, ASM Affiliates, Inc.); 2017 (Haley Chateene, PanGIS); 2017 (A. Foglia, K. Keckeisen, PanGIS, Inc.); 2018 (Sarah Stringer-Bowsher, ASM Affiliates, Inc.)	SD-17576
P-37-034836	CA-SDI-021677						
P-37-034837	CA-SDI-021678						
P-37-034838	CA-SDI-021679						
P-37-035182							
P-37-035259							
P-37-035447							
P-37-035964	CA-SDI-021907	Other - 8324-CL-2	Site	Prehistoric	AP04 (Bedrock milling feature)	2016 (H. Price, RECON)	SD-17377
P-37-035965	CA-SDI-021908	Other - 8324-BT-1	Site	Prehistoric	AP04 (Bedrock milling feature)	2016 (H. Price, RECON)	SD-17377

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-37-036142		Other - 600 East Valley Parkway; Other - Regional Administrative Office of the Health and Human Services Agency; IC Informal - RNID-3104	Building	Historic	HP14 (Government building) - Government Building	2014 (Jennifer Gorman & Shannon Davis, ASM Affiliates, Inc.)	
P-37-036143		Other - 606 East Valley Parkway; Other - North Inland Public Health Center; IC Informal - RNID-3104	Building	Historic	HP14 (Government building) - Governmental Building	2014 (Jennifer Gorman & Shannon Davis, ASM Affiliates, Inc.)	
P-37-036144		Other - 620 East Valley Parkway; Other - Family Resource Center; IC Informal - RNID-3104	Building	Historic	HP14 (Government building) - Government Building	2014 (Jennifer Gorman & Shannon Davis, ASM Affiliates)	
P-37-036400		Other - Palm Tree Motor Lodge; IC Informal - RNID-3168	Building	Historic	HP05 (Hotel/motel)	2016 (Harry J. Price, RECON)	
P-37-036401		Other - Wagon Wheel Restaurant; IC Informal - RNID-3168	Building	Historic	HP39 (Other) - Restaurant	2016 (Harry J. Price, RECON)	
P-37-036603		IC Informal - RNID-3385; Other - Quince Street Warehouse Complex	Building	Historic	AH02 (Foundations/structure pads); AH03 (Landscaping/orchard) - landscaping; HP04 (Ancillary building); HP08 (Industrial building)	2017 (Kristina Davison, Mary Robbins-Wade, HELIX Environmental Planning)	
P-37-037343	CA-SDI-022352	IC Informal - RNID-3921; Other - Escondido-1	Site	Historic	AH04 (Privies/dumps/trash scatters) - dumps	2018 (M. Vader, M. Bever, ESA)	SD-17484
P-37-038321		IC Informal - RNID-4197					

Attachment C

NAHC SLF Search Result

NATIVE AMERICAN HERITAGE COMMISSION

September 22, 2020

Mark Strother
Rincon Consultants

Via Email to: mstrother@rinconconsultants.com

Re: Escondido Creek Trail Project, San Diego County

Dear Mr. Strother:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were positive. Please contact the San Luis Rey Band of Mission Indians on the attached list for more information. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,



Steven Quinn
Cultural Resources Analyst

Attachment



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
Marshall McKay
Wintun

COMMISSIONER
William Mungary
Paiute/White Mountain Apache

COMMISSIONER
[Vacant]

COMMISSIONER
Julie Tumamait-Stenslie
Chumash

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

**Native American Heritage Commission
Native American Contact List
San Diego County
9/22/2020**

Barona Group of the Capitan Grande

Edwin Romero, Chairperson
1095 Barona Road Diegueno
Lakeside, CA, 92040
Phone: (619) 443 - 6612
Fax: (619) 443-0681
cloyd@barona-nsn.gov

Campo Band of Diegueno Mission Indians

Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno
Campo, CA, 91906
Phone: (619) 478 - 9046
Fax: (619) 478-5818
rgoff@campo-nsn.gov

Ewiiapaayp Band of Kumeyaay Indians

Robert Pinto, Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 6315
Fax: (619) 445-9126
wmicklin@leaningrock.net

Ewiiapaayp Band of Kumeyaay Indians

Michael Garcia, Vice Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 6315
Fax: (619) 445-9126
michaelg@leaningrock.net

Iipay Nation of Santa Ysabel

Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 803 - 5694
cjlinton73@aol.com

Iipay Nation of Santa Ysabel

Virgil Perez, Chairperson
P.O. Box 130 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 765 - 0845
Fax: (760) 765-0320

Inaja-Cosmit Band of Indians

Rebecca Osuna, Chairperson
2005 S. Escondido Blvd. Diegueno
Escondido, CA, 92025
Phone: (760) 737 - 7628
Fax: (760) 747-8568

Jamul Indian Village

Erica Pinto, Chairperson
P.O. Box 612 Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4785
Fax: (619) 669-4817
epinto@jiv-nsn.gov

Jamul Indian Village

Lisa Cumper, Tribal Historic Preservation Officer
P.O. Box 612 Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4855
lcumper@jiv-nsn.gov

Kwaaymii Laguna Band of Mission Indians

Carmen Lucas,
P.O. Box 775 Kwaaymii
Pine Valley, CA, 91962 Diegueno
Phone: (619) 709 - 4207

La Jolla Band of Luiseno Indians

Fred Nelson, Chairperson
22000 Highway 76 Luiseno
Pauma Valley, CA, 92061
Phone: (760) 742 - 3771

La Posta Band of Diegueno Mission Indians

Javaughn Miller, Tribal Administrator
8 Crestwood Road Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
jmiller@LPtribe.net

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Escondido Creek Trail Project, San Diego County.

**Native American Heritage Commission
Native American Contact List
San Diego County
9/22/2020**

**La Posta Band of Diegueno
Mission Indians**

Gwendolyn Parada, Chairperson
8 Crestwood Road Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
LP13boots@aol.com

**Pechanga Band of Luiseno
Indians**

Mark Macarro, Chairperson
P.O. Box 1477 Luiseno
Temecula, CA, 92593
Phone: (951) 770 - 6000
Fax: (951) 695-1778
epreston@pechanga-nsn.gov

**Manzanita Band of Kumeyaay
Nation**

Angela Elliott Santos, Chairperson
P.O. Box 1302 Diegueno
Boulevard, CA, 91905
Phone: (619) 766 - 4930
Fax: (619) 766-4957

**Pechanga Band of Luiseno
Indians**

Paul Macarro, Cultural Resources
Coordinator
P.O. Box 1477 Luiseno
Temecula, CA, 92593
Phone: (951) 770 - 6306
Fax: (951) 506-9491
pmacarro@pechanga-nsn.gov

**Mesa Grande Band of Diegueno
Mission Indians**

Michael Linton, Chairperson
P.O. Box 270 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 782 - 3818
Fax: (760) 782-9092
mesagrandeband@msn.com

Rincon Band of Luiseno Indians

Bo Mazzetti, Chairperson
One Government Center Lane Luiseno
Valley Center, CA, 92082
Phone: (760) 749 - 1051
Fax: (760) 749-5144
bomazzetti@aol.com

Pala Band of Mission Indians

Shasta Gaughen, Tribal Historic
Preservation Officer
PMB 50, 35008 Pala Temecula Cupeno
Rd. Luiseno
Pala, CA, 92059
Phone: (760) 891 - 3515
Fax: (760) 742-3189
sgaughen@palatribe.com

Rincon Band of Luiseno Indians

Cheryl Madrigal, Tribal Historic
Preservation Officer
One Government Center Lane Luiseno
Valley Center, CA, 92082
Phone: (760) 297 - 2635
crd@rincon-nsn.gov

Pauma Band of Luiseno Indians

Temet Aguilar, Chairperson
P.O. Box 369 Luiseno
Pauma Valley, CA, 92061
Phone: (760) 742 - 1289
Fax: (760) 742-3422
bennaecalac@aol.com

**San Luis Rey Band of Mission
Indians**

San Luis Rey, Tribal Council
1889 Sunset Drive Luiseno
Vista, CA, 92081
Phone: (760) 724 - 8505
Fax: (760) 724-2172
cjmojado@slrmissionindians.org

**San Luis Rey Band of Mission
Indians**

1889 Sunset Drive Luiseno
Vista, CA, 92081
Phone: (760) 724 - 8505
Fax: (760) 724-2172
cjmojado@slrmissionindians.org

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**Native American Heritage Commission
Native American Contact List
San Diego County
9/22/2020**

**San Pasqual Band of Diegueno
Mission Indians**

John Flores, Environmental
Coordinator
P. O. Box 365 Diegueno
Valley Center, CA, 92082
Phone: (760) 749 - 3200
Fax: (760) 749-3876
johnf@sanpasqualtribe.org

**Sycuan Band of the Kumeyaay
Nation**

Kristie Orosco, Kumeyaay
Resource Specialist
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 6917

**San Pasqual Band of Diegueno
Mission Indians**

Allen Lawson, Chairperson
P.O. Box 365 Diegueno
Valley Center, CA, 92082
Phone: (760) 749 - 3200
Fax: (760) 749-3876
allenl@sanpasqualtribe.org

**Viejas Band of Kumeyaay
Indians**

Ernest Pingleton, Tribal Historic
Officer, Resource Management
1 Viejas Grade Road Diegueno
Alpine, CA, 91901
Phone: (619) 659 - 2314
epingleton@viejas-nsn.gov

**Soboba Band of Luiseno
Indians**

Scott Cozart, Chairperson
P. O. Box 487 Cahuilla
San Jacinto, CA, 92583 Luiseno
Phone: (951) 654 - 2765
Fax: (951) 654-4198
jontiveros@soboba-nsn.gov

**Viejas Band of Kumeyaay
Indians**

John Christman, Chairperson
1 Viejas Grade Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 3810
Fax: (619) 445-5337

**Soboba Band of Luiseno
Indians**

Joseph Ontiveros, Cultural
Resource Department
P.O. BOX 487 Cahuilla
San Jacinto, CA, 92581 Luiseno
Phone: (951) 663 - 5279
Fax: (951) 654-4198
jontiveros@soboba-nsn.gov

**Sycuan Band of the Kumeyaay
Nation**

Cody Martinez, Chairperson
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 2613
Fax: (619) 445-1927
ssilva@sycuan-nsn.gov

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Appendix C

Noise Measurements

Data Logger 2

SET 3

A

SLOW

Range 40-100

L05 47.6

L10 45.4

L50 41.1

L90 38.9

L95 38.5

Max dB 56.9

2021/02/11 10:22:03

SEL 72.5

Leq 43.0

No.s	Date	Time	dB
1	2021/02/11	10:13:22	45.4
2	2021/02/11	10:13:25	48.6
3	2021/02/11	10:13:28	43.6
4	2021/02/11	10:13:31	42.0
5	2021/02/11	10:13:34	41.4
6	2021/02/11	10:13:37	41.0
7	2021/02/11	10:13:40	40.9
8	2021/02/11	10:13:43	42.7
9	2021/02/11	10:13:46	41.2
10	2021/02/11	10:13:49	40.3
11	2021/02/11	10:13:52	42.6
12	2021/02/11	10:13:55	41.4
13	2021/02/11	10:13:58	40.6
14	2021/02/11	10:14:01	43.8
15	2021/02/11	10:14:04	41.1
16	2021/02/11	10:14:07	42.2
17	2021/02/11	10:14:10	40.1
18	2021/02/11	10:14:13	40.9
19	2021/02/11	10:14:16	43.0
20	2021/02/11	10:14:19	41.4
21	2021/02/11	10:14:22	40.1
22	2021/02/11	10:14:25	42.4
23	2021/02/11	10:14:28	41.1
24	2021/02/11	10:14:31	38.9
25	2021/02/11	10:14:34	39.1
26	2021/02/11	10:14:37	43.4
27	2021/02/11	10:14:40	39.3
28	2021/02/11	10:14:43	39.8
29	2021/02/11	10:14:46	41.4
30	2021/02/11	10:14:49	40.3
31	2021/02/11	10:14:52	39.9
32	2021/02/11	10:14:55	39.3
33	2021/02/11	10:14:58	42.0
34	2021/02/11	10:15:01	41.3
35	2021/02/11	10:15:04	39.0
36	2021/02/11	10:15:07	42.4
37	2021/02/11	10:15:10	42.7
38	2021/02/11	10:15:13	40.2
39	2021/02/11	10:15:16	39.2

40	2021/02/11	10:15:19	39.8
41	2021/02/11	10:15:22	39.6
42	2021/02/11	10:15:25	39.8
43	2021/02/11	10:15:28	41.6
44	2021/02/11	10:15:31	39.4
45	2021/02/11	10:15:34	39.8
46	2021/02/11	10:15:37	38.7
47	2021/02/11	10:15:40	38.3
48	2021/02/11	10:15:43	38.7
49	2021/02/11	10:15:46	38.4
50	2021/02/11	10:15:49	38.7
51	2021/02/11	10:15:52	38.6
52	2021/02/11	10:15:55	38.5
53	2021/02/11	10:15:58	41.0
54	2021/02/11	10:16:01	41.3
55	2021/02/11	10:16:04	42.4
56	2021/02/11	10:16:07	40.7
57	2021/02/11	10:16:10	40.3
58	2021/02/11	10:16:13	42.7
59	2021/02/11	10:16:16	39.6
60	2021/02/11	10:16:19	41.5
61	2021/02/11	10:16:22	41.8
62	2021/02/11	10:16:25	39.7
63	2021/02/11	10:16:28	41.3
64	2021/02/11	10:16:31	39.7
65	2021/02/11	10:16:34	39.3
66	2021/02/11	10:16:37	39.5
67	2021/02/11	10:16:40	41.2
68	2021/02/11	10:16:43	39.5
69	2021/02/11	10:16:46	39.4
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81	2021/02/11	10:17:22	40.4
82	2021/02/11	10:17:25	40.2
83	2021/02/11	10:17:28	40.2
84	2021/02/11	10:17:31	39.7
85	2021/02/11	10:17:34	39.3
86	2021/02/11	10:17:37	39.3
87	2021/02/11	10:17:40	39.1
88	2021/02/11	10:17:43	39.1
89	2021/02/11	10:17:46	38.8
90	2021/02/11	10:17:49	38.4
91	2021/02/11	10:17:52	38.5
92	2021/02/11	10:17:55	39.0
93	2021/02/11	10:17:58	39.8

94	2021/02/11	10:18:01	39.1
95	2021/02/11	10:18:04	39.3
96	2021/02/11	10:18:07	39.2
97	2021/02/11	10:18:10	39.5
98	2021/02/11	10:18:13	39.1
99	2021/02/11	10:18:16	39.0
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105	2021/02/11	10:18:34	39.9
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107	2021/02/11	10:18:40	38.5
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109	2021/02/11	10:18:46	38.5
110	2021/02/11	10:18:49	39.7
111	2021/02/11	10:18:52	42.6
112	2021/02/11	10:18:55	38.5
113	2021/02/11	10:18:58	38.6
114	2021/02/11	10:19:01	39.5
115	2021/02/11	10:19:04	41.0
116	2021/02/11	10:19:07	39.9
117	2021/02/11	10:19:10	40.2
118	2021/02/11	10:19:13	39.4
119	2021/02/11	10:19:16	39.2
120	2021/02/11	10:19:19	38.9
121	2021/02/11	10:19:22	39.2
122	2021/02/11	10:19:25	39.4
123	2021/02/11	10:19:28	39.4
124	2021/02/11	10:19:31	40.3
125	2021/02/11	10:19:34	39.4
126	2021/02/11	10:19:37	39.6
127	2021/02/11	10:19:40	39.1
128	2021/02/11	10:19:43	40.5
129	2021/02/11	10:19:46	38.3
130	2021/02/11	10:19:49	39.0
131	2021/02/11	10:19:52	39.1
132	2021/02/11	10:19:55	39.0
133	2021/02/11	10:19:58	38.0
134	2021/02/11	10:20:01	37.8
135	2021/02/11	10:20:04	40.8
136	2021/02/11	10:20:07	39.5
137	2021/02/11	10:20:10	38.9
138	2021/02/11	10:20:13	39.2
139	2021/02/11	10:20:16	41.7
140	2021/02/11	10:20:19	40.6
141	2021/02/11	10:20:22	39.2
142	2021/02/11	10:20:25	40.3
143	2021/02/11	10:20:28	40.5
144	2021/02/11	10:20:31	40.9
145	2021/02/11	10:20:34	40.4
146	2021/02/11	10:20:37	40.7
147	2021/02/11	10:20:40	41.5

148	2021/02/11	10:20:43	40.5
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153	2021/02/11	10:20:58	43.2
154	2021/02/11	10:21:01	41.8
155	2021/02/11	10:21:04	43.4
156	2021/02/11	10:21:07	43.8
157	2021/02/11	10:21:10	45.4
158	2021/02/11	10:21:13	44.6
159	2021/02/11	10:21:16	45.5
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163	2021/02/11	10:21:28	47.7
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165	2021/02/11	10:21:34	47.6
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167	2021/02/11	10:21:40	49.5
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169	2021/02/11	10:21:46	50.2
170	2021/02/11	10:21:49	52.8
171	2021/02/11	10:21:52	53.3*
172	2021/02/11	10:21:55	55.3*
173	2021/02/11	10:21:58	53.9*
174	2021/02/11	10:22:01	56.8*
175	2021/02/11	10:22:04	53.9*
176	2021/02/11	10:22:07	53.1*
177	2021/02/11	10:22:10	52.8*
178	2021/02/11	10:22:13	52.2*
179	2021/02/11	10:22:16	50.1*
180	2021/02/11	10:22:19	49.7
181	2021/02/11	10:22:22	48.3
182	2021/02/11	10:22:25	48.4
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184	2021/02/11	10:22:31	46.7
185	2021/02/11	10:22:34	43.8
186	2021/02/11	10:22:37	42.5
187	2021/02/11	10:22:40	45.3
188	2021/02/11	10:22:43	42.6
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190	2021/02/11	10:22:49	45.2
191	2021/02/11	10:22:52	42.3
192	2021/02/11	10:22:55	42.8
193	2021/02/11	10:22:58	43.9
194	2021/02/11	10:23:01	42.1
195	2021/02/11	10:23:04	42.3
196	2021/02/11	10:23:07	40.7
197	2021/02/11	10:23:10	44.5
198	2021/02/11	10:23:13	40.4
199	2021/02/11	10:23:16	39.8
200	2021/02/11	10:23:19	42.5
201	2021/02/11	10:23:22	41.5

202	2021/02/11	10:23:25	39.9
203	2021/02/11	10:23:28	39.6
204	2021/02/11	10:23:31	39.9
205	2021/02/11	10:23:34	42.1
206	2021/02/11	10:23:37	40.4
207	2021/02/11	10:23:40	39.0
208	2021/02/11	10:23:43	39.2
209	2021/02/11	10:23:46	43.6
210	2021/02/11	10:23:49	40.3
211	2021/02/11	10:23:52	41.0
212	2021/02/11	10:23:55	40.9
213	2021/02/11	10:23:58	41.1
214	2021/02/11	10:24:01	39.7
215	2021/02/11	10:24:04	42.3
216	2021/02/11	10:24:07	48.0
217	2021/02/11	10:24:10	51.5
218	2021/02/11	10:24:13	52.2*
219	2021/02/11	10:24:16	47.1*
220	2021/02/11	10:24:19	43.4*
221	2021/02/11	10:24:22	41.1*
222	2021/02/11	10:24:25	40.3*
223	2021/02/11	10:24:28	40.2*
224	2021/02/11	10:24:31	40.4*
225	2021/02/11	10:24:34	41.4*
226	2021/02/11	10:24:37	44.3*
227	2021/02/11	10:24:40	42.4*
228	2021/02/11	10:24:43	42.5*
229	2021/02/11	10:24:46	41.4*
230	2021/02/11	10:24:49	42.9*
231	2021/02/11	10:24:52	41.0*
232	2021/02/11	10:24:55	40.0*
233	2021/02/11	10:24:58	40.2*
234	2021/02/11	10:25:01	40.1*
235	2021/02/11	10:25:04	39.2*
236	2021/02/11	10:25:07	39.1*
237	2021/02/11	10:25:10	39.2*
238	2021/02/11	10:25:13	39.1*
239	2021/02/11	10:25:16	41.6*
240	2021/02/11	10:25:19	43.7*
241	2021/02/11	10:25:22	44.8*
242	2021/02/11	10:25:25	48.3*
243	2021/02/11	10:25:28	44.8*
244	2021/02/11	10:25:31	40.3*
245	2021/02/11	10:25:34	40.4*
246	2021/02/11	10:25:37	42.3*
247	2021/02/11	10:25:40	46.0*
248	2021/02/11	10:25:43	42.5*
249	2021/02/11	10:25:46	40.8*
250	2021/02/11	10:25:49	39.7*
251	2021/02/11	10:25:52	40.0*
252	2021/02/11	10:25:55	43.7*
253	2021/02/11	10:25:58	43.3*
254	2021/02/11	10:26:01	41.4
255	2021/02/11	10:26:04	41.2

256	2021/02/11	10:26:07	41.9
257	2021/02/11	10:26:10	44.4
258	2021/02/11	10:26:13	40.3
259	2021/02/11	10:26:16	40.7
260	2021/02/11	10:26:19	42.8
261	2021/02/11	10:26:22	48.7
262	2021/02/11	10:26:25	46.8*
263	2021/02/11	10:26:28	45.8*
264	2021/02/11	10:26:31	45.0*
265	2021/02/11	10:26:34	45.2*
266	2021/02/11	10:26:37	48.1*
267	2021/02/11	10:26:40	45.8*
268	2021/02/11	10:26:43	45.5*
269	2021/02/11	10:26:46	45.8*
270	2021/02/11	10:26:49	47.1*
271	2021/02/11	10:26:52	47.3*
272	2021/02/11	10:26:55	48.4*
273	2021/02/11	10:26:58	49.2*
274	2021/02/11	10:27:01	52.6*
275	2021/02/11	10:27:04	51.0*
276	2021/02/11	10:27:07	52.4*
277	2021/02/11	10:27:10	51.1*
278	2021/02/11	10:27:13	49.9*
279	2021/02/11	10:27:16	49.3*
280	2021/02/11	10:27:19	51.2*
281	2021/02/11	10:27:22	50.2*
282	2021/02/11	10:27:25	49.3*
283	2021/02/11	10:27:28	48.9
284	2021/02/11	10:27:31	47.3
285	2021/02/11	10:27:34	47.7
286	2021/02/11	10:27:37	47.9
287	2021/02/11	10:27:40	44.9
288	2021/02/11	10:27:43	46.8
289	2021/02/11	10:27:46	45.6
290	2021/02/11	10:27:49	47.6
291	2021/02/11	10:27:52	44.5
292	2021/02/11	10:27:55	46.7
293	2021/02/11	10:27:58	46.5
294	2021/02/11	10:28:01	44.9
295	2021/02/11	10:28:04	41.0
296	2021/02/11	10:28:07	43.7
297	2021/02/11	10:28:10	44.6
298	2021/02/11	10:28:13	44.2
299	2021/02/11	10:28:16	42.0
300	2021/02/11	10:28:19	45.0
301	2021/02/11	10:28:22	42.9
302	2021/02/11	10:28:25	42.1
303	2021/02/11	10:28:28	42.0
304	2021/02/11	10:28:31	45.6
305	2021/02/11	10:28:34	42.9
306	2021/02/11	10:28:37	42.4
307	2021/02/11	10:28:40	41.8
308	2021/02/11	10:28:43	45.0
309	2021/02/11	10:28:46	41.7

310	2021/02/11	10:28:49	42.2
311	2021/02/11	10:28:52	43.0
312	2021/02/11	10:28:55	45.0
313	2021/02/11	10:28:58	41.6
314	2021/02/11	10:29:01	40.9
315	2021/02/11	10:29:04	43.5
316	2021/02/11	10:29:07	41.8
317	2021/02/11	10:29:10	41.5
318	2021/02/11	10:29:13	40.8
319	2021/02/11	10:29:16	43.4
320	2021/02/11	10:29:19	41.2
321	2021/02/11	10:29:22	41.0
322	2021/02/11	10:29:25	43.1
323	2021/02/11	10:29:28	42.9
324	2021/02/11	10:29:31	42.4
325	2021/02/11	10:29:34	40.7
326	2021/02/11	10:29:37	43.4
327	2021/02/11	10:29:40	40.4
328	2021/02/11	10:29:43	40.4
329	2021/02/11	10:29:46	40.9
330	2021/02/11	10:29:49	42.7
331	2021/02/11	10:29:52	41.4
332	2021/02/11	10:29:55	41.5
333	2021/02/11	10:29:58	42.8
334	2021/02/11	10:30:01	44.1
335	2021/02/11	10:30:04	42.5
336	2021/02/11	10:30:07	42.0
337	2021/02/11	10:30:10	46.0
338	2021/02/11	10:30:13	42.8
339	2021/02/11	10:30:16	40.9
340	2021/02/11	10:30:19	42.0
341	2021/02/11	10:30:22	43.5
342	2021/02/11	10:30:25	42.0
343	2021/02/11	10:30:28	41.4
344	2021/02/11	10:30:31	42.8
345	2021/02/11	10:30:34	40.8
346	2021/02/11	10:30:37	39.9
347	2021/02/11	10:30:40	44.6
348	2021/02/11	10:30:43	41.8
349	2021/02/11	10:30:46	43.2
350	2021/02/11	10:30:49	44.6
351	2021/02/11	10:30:52	44.7
352	2021/02/11	10:30:55	43.5
353	2021/02/11	10:30:58	45.0
354	2021/02/11	10:31:01	43.4
355	2021/02/11	10:31:04	41.2
356	2021/02/11	10:31:07	40.9
357	2021/02/11	10:31:10	40.8
358	2021/02/11	10:31:13	43.0
359	2021/02/11	10:31:16	40.2
360	2021/02/11	10:31:19	39.7
361	2021/02/11	10:31:22	42.8
362	2021/02/11	10:31:25	39.0
363	2021/02/11	10:31:28	39.9

364	2021/02/11	10:31:31	42.4
365	2021/02/11	10:31:34	41.8

Data Logger 2

SET 3

A

SLOW

Range 40-100

L05 65.9

L10 64.5

L50 57.2

L90 49.1

L95 47.2

Max dB 73.3

2021/02/11 11:10:25

SEL 90.1

Leq 60.6

No.s	Date	Time	dB
1	2021/02/11	10:55:40	63.9
2	2021/02/11	10:55:43	66.3
3	2021/02/11	10:55:46	59.9
4	2021/02/11	10:55:49	58.9
5	2021/02/11	10:55:52	69.3
6	2021/02/11	10:55:55	59.3
7	2021/02/11	10:55:58	57.6
8	2021/02/11	10:56:01	57.7
9	2021/02/11	10:56:04	64.0
10	2021/02/11	10:56:07	68.8
11	2021/02/11	10:56:10	65.5
12	2021/02/11	10:56:13	60.5
13	2021/02/11	10:56:16	67.0
14	2021/02/11	10:56:19	60.4
15	2021/02/11	10:56:22	59.7
16	2021/02/11	10:56:25	62.6
17	2021/02/11	10:56:28	56.9
18	2021/02/11	10:56:31	48.7
19	2021/02/11	10:56:34	47.2
20	2021/02/11	10:56:37	55.6
21	2021/02/11	10:56:40	63.1
22	2021/02/11	10:56:43	53.0
23	2021/02/11	10:56:46	49.0
24	2021/02/11	10:56:49	51.4
25	2021/02/11	10:56:52	56.1
26	2021/02/11	10:56:55	62.9
27	2021/02/11	10:56:58	61.7
28	2021/02/11	10:57:01	58.7
29	2021/02/11	10:57:04	54.1
30	2021/02/11	10:57:07	65.6
31	2021/02/11	10:57:10	58.3
32	2021/02/11	10:57:13	54.1
33	2021/02/11	10:57:16	54.4
34	2021/02/11	10:57:19	57.8
35	2021/02/11	10:57:22	52.7
36	2021/02/11	10:57:25	55.2
37	2021/02/11	10:57:28	58.4
38	2021/02/11	10:57:31	59.9
39	2021/02/11	10:57:34	58.8

40	2021/02/11	10:57:37	61.7
41	2021/02/11	10:57:40	65.2
42	2021/02/11	10:57:43	65.8
43	2021/02/11	10:57:46	60.7
44	2021/02/11	10:57:49	64.7
45	2021/02/11	10:57:52	56.8
46	2021/02/11	10:57:55	61.9
47	2021/02/11	10:57:58	58.5
48	2021/02/11	10:58:01	62.5
49	2021/02/11	10:58:04	53.3
50	2021/02/11	10:58:07	50.9
51	2021/02/11	10:58:10	64.5
52	2021/02/11	10:58:13	57.9
53	2021/02/11	10:58:16	56.5
54	2021/02/11	10:58:19	53.3
55	2021/02/11	10:58:22	60.3
56	2021/02/11	10:58:25	59.1
57	2021/02/11	10:58:28	55.1
58	2021/02/11	10:58:31	54.0
59	2021/02/11	10:58:34	57.8
60	2021/02/11	10:58:37	58.3
61	2021/02/11	10:58:40	57.5
62	2021/02/11	10:58:43	56.4
63	2021/02/11	10:58:46	53.7
64	2021/02/11	10:58:49	53.1
65	2021/02/11	10:58:52	51.1
66	2021/02/11	10:58:55	50.5
67	2021/02/11	10:58:58	54.6
68	2021/02/11	10:59:01	56.7
69	2021/02/11	10:59:04	56.7
70	2021/02/11	10:59:07	66.3
71	2021/02/11	10:59:10	64.5
72	2021/02/11	10:59:13	59.8
73	2021/02/11	10:59:16	64.8
74	2021/02/11	10:59:19	64.3
75	2021/02/11	10:59:22	61.0
76	2021/02/11	10:59:25	60.2
77	2021/02/11	10:59:28	53.6
78	2021/02/11	10:59:31	61.0
79	2021/02/11	10:59:34	63.1
80	2021/02/11	10:59:37	56.1
81	2021/02/11	10:59:40	49.0
82	2021/02/11	10:59:43	48.5
83	2021/02/11	10:59:46	47.9
84	2021/02/11	10:59:49	49.7
85	2021/02/11	10:59:52	57.9
86	2021/02/11	10:59:55	67.8
87	2021/02/11	10:59:58	60.3
88	2021/02/11	11:00:01	64.6
89	2021/02/11	11:00:04	60.6
90	2021/02/11	11:00:07	58.2
91	2021/02/11	11:00:10	53.9
92	2021/02/11	11:00:13	57.4
93	2021/02/11	11:00:16	54.2

94	2021/02/11	11:00:19	54.9
95	2021/02/11	11:00:22	57.1
96	2021/02/11	11:00:25	62.1
97	2021/02/11	11:00:28	63.3
98	2021/02/11	11:00:31	53.8
99	2021/02/11	11:00:34	48.6
100	2021/02/11	11:00:37	53.9
101	2021/02/11	11:00:40	63.7
102	2021/02/11	11:00:43	58.0
103	2021/02/11	11:00:46	51.0
104	2021/02/11	11:00:49	55.3
105	2021/02/11	11:00:52	60.0
106	2021/02/11	11:00:55	54.6
107	2021/02/11	11:00:58	50.3
108	2021/02/11	11:01:01	50.2
109	2021/02/11	11:01:04	46.1
110	2021/02/11	11:01:07	45.5
111	2021/02/11	11:01:10	44.5
112	2021/02/11	11:01:13	44.3
113	2021/02/11	11:01:16	46.5
114	2021/02/11	11:01:19	53.2
115	2021/02/11	11:01:22	52.8
116	2021/02/11	11:01:25	53.5
117	2021/02/11	11:01:28	64.4
118	2021/02/11	11:01:31	68.0
119	2021/02/11	11:01:34	60.2
120	2021/02/11	11:01:37	64.6
121	2021/02/11	11:01:40	64.9
122	2021/02/11	11:01:43	66.5
123	2021/02/11	11:01:46	64.0
124	2021/02/11	11:01:49	62.2
125	2021/02/11	11:01:52	60.3
126	2021/02/11	11:01:55	58.2
127	2021/02/11	11:01:58	54.6
128	2021/02/11	11:02:01	51.4
129	2021/02/11	11:02:04	47.2
130	2021/02/11	11:02:07	45.5
131	2021/02/11	11:02:10	54.4
132	2021/02/11	11:02:13	64.2
133	2021/02/11	11:02:16	55.0
134	2021/02/11	11:02:19	52.4
135	2021/02/11	11:02:22	55.7
136	2021/02/11	11:02:25	63.1
137	2021/02/11	11:02:28	55.5
138	2021/02/11	11:02:31	48.6
139	2021/02/11	11:02:34	45.4
140	2021/02/11	11:02:37	44.9
141	2021/02/11	11:02:40	49.6
142	2021/02/11	11:02:43	53.9
143	2021/02/11	11:02:46	52.1
144	2021/02/11	11:02:49	45.6
145	2021/02/11	11:02:52	46.5
146	2021/02/11	11:02:55	54.4
147	2021/02/11	11:02:58	58.6

148	2021/02/11	11:03:01	60.0
149	2021/02/11	11:03:04	52.6
150	2021/02/11	11:03:07	50.9
151	2021/02/11	11:03:10	57.1
152	2021/02/11	11:03:13	62.3
153	2021/02/11	11:03:16	63.5
154	2021/02/11	11:03:19	61.4
155	2021/02/11	11:03:22	56.1
156	2021/02/11	11:03:25	63.3
157	2021/02/11	11:03:28	60.9
158	2021/02/11	11:03:31	60.7
159	2021/02/11	11:03:34	56.8
160	2021/02/11	11:03:37	56.5
161	2021/02/11	11:03:40	59.2
162	2021/02/11	11:03:43	58.9
163	2021/02/11	11:03:46	55.6
164	2021/02/11	11:03:49	56.6
165	2021/02/11	11:03:52	55.4
166	2021/02/11	11:03:55	53.9
167	2021/02/11	11:03:58	64.3
168	2021/02/11	11:04:01	67.3
169	2021/02/11	11:04:04	68.0
170	2021/02/11	11:04:07	63.4
171	2021/02/11	11:04:10	57.2
172	2021/02/11	11:04:13	53.2
173	2021/02/11	11:04:16	52.8
174	2021/02/11	11:04:19	52.5
175	2021/02/11	11:04:22	60.4
176	2021/02/11	11:04:25	59.4
177	2021/02/11	11:04:28	61.4
178	2021/02/11	11:04:31	55.1
179	2021/02/11	11:04:34	49.8
180	2021/02/11	11:04:37	53.0
181	2021/02/11	11:04:40	60.5
182	2021/02/11	11:04:43	55.0
183	2021/02/11	11:04:46	49.5
184	2021/02/11	11:04:49	47.8
185	2021/02/11	11:04:52	46.9
186	2021/02/11	11:04:55	47.6
187	2021/02/11	11:04:58	55.4
188	2021/02/11	11:05:01	63.8
189	2021/02/11	11:05:04	55.5
190	2021/02/11	11:05:07	55.0
191	2021/02/11	11:05:10	54.0
192	2021/02/11	11:05:13	53.9
193	2021/02/11	11:05:16	54.3
194	2021/02/11	11:05:19	55.7
195	2021/02/11	11:05:22	56.4
196	2021/02/11	11:05:25	54.7
197	2021/02/11	11:05:28	59.0
198	2021/02/11	11:05:31	60.3
199	2021/02/11	11:05:34	56.2
200	2021/02/11	11:05:37	59.7
201	2021/02/11	11:05:40	65.3

202	2021/02/11	11:05:43	64.1
203	2021/02/11	11:05:46	68.6
204	2021/02/11	11:05:49	65.4
205	2021/02/11	11:05:52	62.0
206	2021/02/11	11:05:55	55.5
207	2021/02/11	11:05:58	52.2
208	2021/02/11	11:06:01	52.7
209	2021/02/11	11:06:04	55.0
210	2021/02/11	11:06:07	66.8
211	2021/02/11	11:06:10	63.1
212	2021/02/11	11:06:13	64.4
213	2021/02/11	11:06:16	59.2
214	2021/02/11	11:06:19	63.0
215	2021/02/11	11:06:22	58.0
216	2021/02/11	11:06:25	57.3
217	2021/02/11	11:06:28	51.7
218	2021/02/11	11:06:31	57.2
219	2021/02/11	11:06:34	54.7
220	2021/02/11	11:06:37	48.4
221	2021/02/11	11:06:40	50.4
222	2021/02/11	11:06:43	61.4
223	2021/02/11	11:06:46	59.1
224	2021/02/11	11:06:49	52.4
225	2021/02/11	11:06:52	52.8
226	2021/02/11	11:06:55	55.7
227	2021/02/11	11:06:58	51.8
228	2021/02/11	11:07:01	54.7
229	2021/02/11	11:07:04	55.5
230	2021/02/11	11:07:07	53.5
231	2021/02/11	11:07:10	51.1
232	2021/02/11	11:07:13	50.0
233	2021/02/11	11:07:16	50.2
234	2021/02/11	11:07:19	53.5
235	2021/02/11	11:07:22	62.5
236	2021/02/11	11:07:25	60.9
237	2021/02/11	11:07:28	58.8
238	2021/02/11	11:07:31	52.5
239	2021/02/11	11:07:34	48.8
240	2021/02/11	11:07:37	49.7
241	2021/02/11	11:07:40	61.4
242	2021/02/11	11:07:43	58.0
243	2021/02/11	11:07:46	62.8
244	2021/02/11	11:07:49	66.5
245	2021/02/11	11:07:52	65.7
246	2021/02/11	11:07:55	61.4
247	2021/02/11	11:07:58	59.9
248	2021/02/11	11:08:01	60.7
249	2021/02/11	11:08:04	60.4
250	2021/02/11	11:08:07	52.1
251	2021/02/11	11:08:10	48.0
252	2021/02/11	11:08:13	52.9
253	2021/02/11	11:08:16	58.0
254	2021/02/11	11:08:19	52.6
255	2021/02/11	11:08:22	57.0

256	2021/02/11	11:08:25	55.0
257	2021/02/11	11:08:28	50.9
258	2021/02/11	11:08:31	47.8
259	2021/02/11	11:08:34	50.6
260	2021/02/11	11:08:37	62.3
261	2021/02/11	11:08:40	60.3
262	2021/02/11	11:08:43	54.5
263	2021/02/11	11:08:46	63.2
264	2021/02/11	11:08:49	58.6
265	2021/02/11	11:08:52	51.3
266	2021/02/11	11:08:55	49.1
267	2021/02/11	11:08:58	49.7
268	2021/02/11	11:09:01	48.5
269	2021/02/11	11:09:04	48.1
270	2021/02/11	11:09:07	58.7
271	2021/02/11	11:09:10	60.4
272	2021/02/11	11:09:13	54.2
273	2021/02/11	11:09:16	54.2
274	2021/02/11	11:09:19	54.9
275	2021/02/11	11:09:22	60.7
276	2021/02/11	11:09:25	64.9
277	2021/02/11	11:09:28	60.5
278	2021/02/11	11:09:31	57.5
279	2021/02/11	11:09:34	51.6
280	2021/02/11	11:09:37	55.3
281	2021/02/11	11:09:40	65.6
282	2021/02/11	11:09:43	61.9
283	2021/02/11	11:09:46	60.6
284	2021/02/11	11:09:49	60.1
285	2021/02/11	11:09:52	66.8
286	2021/02/11	11:09:55	66.2
287	2021/02/11	11:09:58	67.3
288	2021/02/11	11:10:01	62.6
289	2021/02/11	11:10:04	58.4
290	2021/02/11	11:10:07	52.4
291	2021/02/11	11:10:10	51.7
292	2021/02/11	11:10:13	53.1
293	2021/02/11	11:10:16	59.5
294	2021/02/11	11:10:19	59.6
295	2021/02/11	11:10:22	71.2
296	2021/02/11	11:10:25	67.9
297	2021/02/11	11:10:28	65.9
298	2021/02/11	11:10:31	64.3
299	2021/02/11	11:10:34	61.5
300	2021/02/11	11:10:37	62.4

Data Logger 2

SET 3

A

SLOW

Range 40-100

L05 53.0

L10 50.9

L50 45.4

L90 41.8

L95 41.2

Max dB 72.2

2021/02/11 11:27:05

SEL 78.9

Leq 49.4

No.s	Date	Time	dB
1	2021/02/11	11:23:23	43.2
2	2021/02/11	11:23:26	42.3
3	2021/02/11	11:23:29	42.1
4	2021/02/11	11:23:32	43.3
5	2021/02/11	11:23:35	44.1
6	2021/02/11	11:23:38	43.4
7	2021/02/11	11:23:41	47.3
8	2021/02/11	11:23:44	46.3
9	2021/02/11	11:23:47	43.6
10	2021/02/11	11:23:50	45.8
11	2021/02/11	11:23:53	46.6
12	2021/02/11	11:23:56	46.5
13	2021/02/11	11:23:59	45.5
14	2021/02/11	11:24:02	45.7
15	2021/02/11	11:24:05	44.5
16	2021/02/11	11:24:08	46.5
17	2021/02/11	11:24:11	45.5
18	2021/02/11	11:24:14	43.7
19	2021/02/11	11:24:17	46.1
20	2021/02/11	11:24:20	44.9
21	2021/02/11	11:24:23	45.2
22	2021/02/11	11:24:26	46.6
23	2021/02/11	11:24:29	44.7
24	2021/02/11	11:24:32	40.9
25	2021/02/11	11:24:35	39.7
26	2021/02/11	11:24:38	42.7
27	2021/02/11	11:24:41	47.5
28	2021/02/11	11:24:44	52.1*
29	2021/02/11	11:24:47	51.6*
30	2021/02/11	11:24:50	51.6*
31	2021/02/11	11:24:53	54.5*
32	2021/02/11	11:24:56	67.8*
33	2021/02/11	11:24:59	57.5*
34	2021/02/11	11:25:02	53.5*
35	2021/02/11	11:25:05	47.6*
36	2021/02/11	11:25:08	47.2*
37	2021/02/11	11:25:11	47.9*
38	2021/02/11	11:25:14	47.3*
39	2021/02/11	11:25:17	42.6*

40	2021/02/11	11:25:20	44.1*
41	2021/02/11	11:25:23	43.5*
42	2021/02/11	11:25:26	43.7
43	2021/02/11	11:25:29	44.2
44	2021/02/11	11:25:32	42.1
45	2021/02/11	11:25:35	43.1
46	2021/02/11	11:25:38	42.2
47	2021/02/11	11:25:41	42.1
48	2021/02/11	11:25:44	42.6
49	2021/02/11	11:25:47	42.9
50	2021/02/11	11:25:50	42.9
51	2021/02/11	11:25:53	44.7
52	2021/02/11	11:25:56	45.7
53	2021/02/11	11:25:59	48.9
54	2021/02/11	11:26:02	52.5
55	2021/02/11	11:26:05	53.1
56	2021/02/11	11:26:08	52.4
57	2021/02/11	11:26:11	51.9
58	2021/02/11	11:26:14	53.1
59	2021/02/11	11:26:17	51.0
60	2021/02/11	11:26:20	54.2
61	2021/02/11	11:26:23	55.9
62	2021/02/11	11:26:26	52.5
63	2021/02/11	11:26:29	51.4
64	2021/02/11	11:26:32	52.0
65	2021/02/11	11:26:35	55.2
66	2021/02/11	11:26:38	57.3
67	2021/02/11	11:26:41	57.3
68	2021/02/11	11:26:44	57.6*
69	2021/02/11	11:26:47	60.2*
70	2021/02/11	11:26:50	62.6*
71	2021/02/11	11:26:53	64.4*
72	2021/02/11	11:26:56	67.7*
73	2021/02/11	11:26:59	69.8*
74	2021/02/11	11:27:02	71.0*
75	2021/02/11	11:27:05	71.0*
76	2021/02/11	11:27:08	69.2*
77	2021/02/11	11:27:11	65.9*
78	2021/02/11	11:27:14	64.1
79	2021/02/11	11:27:17	58.4
80	2021/02/11	11:27:20	55.0
81	2021/02/11	11:27:23	61.0
82	2021/02/11	11:27:26	53.9
83	2021/02/11	11:27:29	51.4
84	2021/02/11	11:27:32	50.1
85	2021/02/11	11:27:35	49.5
86	2021/02/11	11:27:38	47.0
87	2021/02/11	11:27:41	48.3
88	2021/02/11	11:27:44	48.2
89	2021/02/11	11:27:47	43.8
90	2021/02/11	11:27:50	43.8
91	2021/02/11	11:27:53	47.4
92	2021/02/11	11:27:56	44.8
93	2021/02/11	11:27:59	46.5

94	2021/02/11	11:28:02	43.2
95	2021/02/11	11:28:05	44.2
96	2021/02/11	11:28:08	49.1
97	2021/02/11	11:28:11	46.4
98	2021/02/11	11:28:14	44.0
99	2021/02/11	11:28:17	46.0
100	2021/02/11	11:28:20	42.5
101	2021/02/11	11:28:23	40.9
102	2021/02/11	11:28:26	41.7
103	2021/02/11	11:28:29	45.0
104	2021/02/11	11:28:32	47.7
105	2021/02/11	11:28:35	47.7
106	2021/02/11	11:28:38	45.7
107	2021/02/11	11:28:41	43.7
108	2021/02/11	11:28:44	43.5
109	2021/02/11	11:28:47	43.4
110	2021/02/11	11:28:50	42.3
111	2021/02/11	11:28:53	41.5
112	2021/02/11	11:28:56	43.5
113	2021/02/11	11:28:59	41.6
114	2021/02/11	11:29:02	45.5
115	2021/02/11	11:29:05	44.9
116	2021/02/11	11:29:08	42.5
117	2021/02/11	11:29:11	48.5
118	2021/02/11	11:29:14	43.8
119	2021/02/11	11:29:17	42.6
120	2021/02/11	11:29:20	46.1
121	2021/02/11	11:29:23	46.6
122	2021/02/11	11:29:26	43.5
123	2021/02/11	11:29:29	43.0
124	2021/02/11	11:29:32	42.2
125	2021/02/11	11:29:35	40.3
126	2021/02/11	11:29:38	40.3
127	2021/02/11	11:29:41	42.0
128	2021/02/11	11:29:44	44.5
129	2021/02/11	11:29:47	43.6
130	2021/02/11	11:29:50	40.5
131	2021/02/11	11:29:53	40.8
132	2021/02/11	11:29:56	43.6
133	2021/02/11	11:29:59	42.6
134	2021/02/11	11:30:02	41.9
135	2021/02/11	11:30:05	45.1
136	2021/02/11	11:30:08	42.0
137	2021/02/11	11:30:11	47.8
138	2021/02/11	11:30:14	47.0
139	2021/02/11	11:30:17	48.1
140	2021/02/11	11:30:20	51.7
141	2021/02/11	11:30:23	48.3
142	2021/02/11	11:30:26	48.3
143	2021/02/11	11:30:29	46.3
144	2021/02/11	11:30:32	44.8
145	2021/02/11	11:30:35	45.0
146	2021/02/11	11:30:38	44.9
147	2021/02/11	11:30:41	44.3

148	2021/02/11	11:30:44	43.8
149	2021/02/11	11:30:47	43.5
150	2021/02/11	11:30:50	46.6
151	2021/02/11	11:30:53	41.6
152	2021/02/11	11:30:56	41.2
153	2021/02/11	11:30:59	42.3
154	2021/02/11	11:31:02	42.6
155	2021/02/11	11:31:05	47.3
156	2021/02/11	11:31:08	48.4
157	2021/02/11	11:31:11	48.8
158	2021/02/11	11:31:14	50.3
159	2021/02/11	11:31:17	48.3
160	2021/02/11	11:31:20	46.3
161	2021/02/11	11:31:23	50.0
162	2021/02/11	11:31:26	49.3
163	2021/02/11	11:31:29	46.5
164	2021/02/11	11:31:32	45.7
165	2021/02/11	11:31:35	45.9
166	2021/02/11	11:31:38	47.0
167	2021/02/11	11:31:41	50.7
168	2021/02/11	11:31:44	43.0
169	2021/02/11	11:31:47	42.0
170	2021/02/11	11:31:50	44.8
171	2021/02/11	11:31:53	45.9
172	2021/02/11	11:31:56	42.9
173	2021/02/11	11:31:59	41.7
174	2021/02/11	11:32:02	40.3
175	2021/02/11	11:32:05	47.9
176	2021/02/11	11:32:08	46.3
177	2021/02/11	11:32:11	42.0
178	2021/02/11	11:32:14	42.4
179	2021/02/11	11:32:17	40.8
180	2021/02/11	11:32:20	41.2
181	2021/02/11	11:32:23	42.0
182	2021/02/11	11:32:26	45.8
183	2021/02/11	11:32:29	46.2
184	2021/02/11	11:32:32	47.6
185	2021/02/11	11:32:35	50.1
186	2021/02/11	11:32:38	48.4
187	2021/02/11	11:32:41	49.3
188	2021/02/11	11:32:44	48.3
189	2021/02/11	11:32:47	48.2
190	2021/02/11	11:32:50	48.3
191	2021/02/11	11:32:53	49.0
192	2021/02/11	11:32:56	48.6
193	2021/02/11	11:32:59	52.3
194	2021/02/11	11:33:02	50.2
195	2021/02/11	11:33:05	49.6
196	2021/02/11	11:33:08	49.5
197	2021/02/11	11:33:11	49.6
198	2021/02/11	11:33:14	49.3
199	2021/02/11	11:33:17	51.4
200	2021/02/11	11:33:20	47.3
201	2021/02/11	11:33:23	49.7

202	2021/02/11	11:33:26	48.0
203	2021/02/11	11:33:29	47.4
204	2021/02/11	11:33:32	50.3
205	2021/02/11	11:33:35	47.3
206	2021/02/11	11:33:38	46.2
207	2021/02/11	11:33:41	46.0
208	2021/02/11	11:33:44	41.1
209	2021/02/11	11:33:47	43.5
210	2021/02/11	11:33:50	43.8
211	2021/02/11	11:33:53	42.4
212	2021/02/11	11:33:56	43.8
213	2021/02/11	11:33:59	46.6
214	2021/02/11	11:34:02	45.6
215	2021/02/11	11:34:05	44.8
216	2021/02/11	11:34:08	47.3
217	2021/02/11	11:34:11	45.2
218	2021/02/11	11:34:14	49.3
219	2021/02/11	11:34:17	48.3
220	2021/02/11	11:34:20	49.4
221	2021/02/11	11:34:23	53.5
222	2021/02/11	11:34:26	53.0
223	2021/02/11	11:34:29	47.8
224	2021/02/11	11:34:32	43.9
225	2021/02/11	11:34:35	42.9
226	2021/02/11	11:34:38	44.6
227	2021/02/11	11:34:41	41.4
228	2021/02/11	11:34:44	43.7
229	2021/02/11	11:34:47	44.3
230	2021/02/11	11:34:50	45.5
231	2021/02/11	11:34:53	45.6
232	2021/02/11	11:34:56	45.4
233	2021/02/11	11:34:59	45.1
234	2021/02/11	11:35:02	46.3
235	2021/02/11	11:35:05	45.1
236	2021/02/11	11:35:08	47.0
237	2021/02/11	11:35:11	44.9
238	2021/02/11	11:35:14	45.7
239	2021/02/11	11:35:17	46.3
240	2021/02/11	11:35:20	43.2
241	2021/02/11	11:35:23	43.0
242	2021/02/11	11:35:26	43.1
243	2021/02/11	11:35:29	45.0
244	2021/02/11	11:35:32	46.2
245	2021/02/11	11:35:35	52.3
246	2021/02/11	11:35:38	53.8
247	2021/02/11	11:35:41	48.9
248	2021/02/11	11:35:44	45.8
249	2021/02/11	11:35:47	46.2
250	2021/02/11	11:35:50	47.0
251	2021/02/11	11:35:53	50.5
252	2021/02/11	11:35:56	55.1
253	2021/02/11	11:35:59	50.4
254	2021/02/11	11:36:02	47.5
255	2021/02/11	11:36:05	44.4

256	2021/02/11	11:36:08	44.5
257	2021/02/11	11:36:11	46.2
258	2021/02/11	11:36:14	46.5
259	2021/02/11	11:36:17	44.2
260	2021/02/11	11:36:20	43.4
261	2021/02/11	11:36:23	43.3
262	2021/02/11	11:36:26	46.7
263	2021/02/11	11:36:29	44.4
264	2021/02/11	11:36:32	46.0
265	2021/02/11	11:36:35	66.7
266	2021/02/11	11:36:38	54.3
267	2021/02/11	11:36:41	43.7
268	2021/02/11	11:36:44	40.9
269	2021/02/11	11:36:47	58.8
270	2021/02/11	11:36:50	48.3
271	2021/02/11	11:36:53	43.5
272	2021/02/11	11:36:56	46.7
273	2021/02/11	11:36:59	47.2
274	2021/02/11	11:37:02	48.7
275	2021/02/11	11:37:05	49.3
276	2021/02/11	11:37:08	45.9
277	2021/02/11	11:37:11	46.9
278	2021/02/11	11:37:14	50.1
279	2021/02/11	11:37:17	47.2
280	2021/02/11	11:37:20	46.5
281	2021/02/11	11:37:23	46.4
282	2021/02/11	11:37:26	44.3
283	2021/02/11	11:37:29	48.2
284	2021/02/11	11:37:32	46.6
285	2021/02/11	11:37:35	45.5
286	2021/02/11	11:37:38	44.2
287	2021/02/11	11:37:41	45.5
288	2021/02/11	11:37:44	43.9
289	2021/02/11	11:37:47	43.4
290	2021/02/11	11:37:50	43.6
291	2021/02/11	11:37:53	43.4
292	2021/02/11	11:37:56	45.9
293	2021/02/11	11:37:59	43.9
294	2021/02/11	11:38:02	44.5
295	2021/02/11	11:38:05	45.2
296	2021/02/11	11:38:08	42.6
297	2021/02/11	11:38:11	43.5
298	2021/02/11	11:38:14	42.8
299	2021/02/11	11:38:17	41.0
300	2021/02/11	11:38:20	44.0
301	2021/02/11	11:38:23	43.0
302	2021/02/11	11:38:26	43.4
303	2021/02/11	11:38:29	44.8
304	2021/02/11	11:38:32	43.2
305	2021/02/11	11:38:35	45.9
306	2021/02/11	11:38:38	44.1
307	2021/02/11	11:38:41	41.9
308	2021/02/11	11:38:44	40.8
309	2021/02/11	11:38:47	44.8

310	2021/02/11	11:38:50	40.6
311	2021/02/11	11:38:53	45.6
312	2021/02/11	11:38:56	42.3
313	2021/02/11	11:38:59	42.6
314	2021/02/11	11:39:02	45.1
315	2021/02/11	11:39:05	42.5
316	2021/02/11	11:39:08	43.2
317	2021/02/11	11:39:11	45.9
318	2021/02/11	11:39:14	44.6
319	2021/02/11	11:39:17	42.3
320	2021/02/11	11:39:20	44.5
321	2021/02/11	11:39:23	44.7
322	2021/02/11	11:39:26	43.6
323	2021/02/11	11:39:29	44.3
324	2021/02/11	11:39:32	46.0

Data Logger 2

SET 3

A

SLOW

Range 40-100

L05 68.0

L10 67.1

L50 61.6

L90 48.4

L95 45.5

Max dB 78.8

2021/02/11 11:54:31

SEL 93.6

Leq 64.1

No.s	Date	Time	dB
1	2021/02/11	11:52:47	67.4
2	2021/02/11	11:52:50	69.4
3	2021/02/11	11:52:53	69.7
4	2021/02/11	11:52:56	64.4
5	2021/02/11	11:52:59	60.7
6	2021/02/11	11:53:02	67.9
7	2021/02/11	11:53:05	58.4
8	2021/02/11	11:53:08	49.7
9	2021/02/11	11:53:11	49.1
10	2021/02/11	11:53:14	59.5
11	2021/02/11	11:53:17	63.1
12	2021/02/11	11:53:20	58.3
13	2021/02/11	11:53:23	61.4
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15	2021/02/11	11:53:29	61.9
16	2021/02/11	11:53:32	53.6
17	2021/02/11	11:53:35	48.7
18	2021/02/11	11:53:38	54.2
19	2021/02/11	11:53:41	62.7
20	2021/02/11	11:53:44	60.0
21	2021/02/11	11:53:47	50.9
22	2021/02/11	11:53:50	47.3
23	2021/02/11	11:53:53	52.3
24	2021/02/11	11:53:56	62.6
25	2021/02/11	11:53:59	64.8
26	2021/02/11	11:54:02	64.9
27	2021/02/11	11:54:05	57.2
28	2021/02/11	11:54:08	50.9
29	2021/02/11	11:54:11	51.9
30	2021/02/11	11:54:14	58.5
31	2021/02/11	11:54:17	63.4
32	2021/02/11	11:54:20	67.1
33	2021/02/11	11:54:23	67.3
34	2021/02/11	11:54:26	70.9
35	2021/02/11	11:54:29	77.3
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49	2021/02/11	11:55:11	67.7
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56	2021/02/11	11:55:32	51.0
57	2021/02/11	11:55:35	61.6
58	2021/02/11	11:55:38	63.3
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72	2021/02/11	11:56:20	44.1
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84	2021/02/11	11:56:56	65.1
85	2021/02/11	11:56:59	66.4
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100	2021/02/11	11:57:44	58.0
101	2021/02/11	11:57:47	61.2
102	2021/02/11	11:57:50	66.2
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252	2021/02/11	12:05:20	60.4
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255	2021/02/11	12:05:29	64.1

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257	2021/02/11	12:05:35	63.4
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259	2021/02/11	12:05:41	60.9
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272	2021/02/11	12:06:20	49.0
273	2021/02/11	12:06:23	46.1
274	2021/02/11	12:06:26	46.3
275	2021/02/11	12:06:29	52.7
276	2021/02/11	12:06:32	61.3
277	2021/02/11	12:06:35	56.8
278	2021/02/11	12:06:38	54.2
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281	2021/02/11	12:06:47	46.9
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283	2021/02/11	12:06:53	57.0
284	2021/02/11	12:06:56	60.4
285	2021/02/11	12:06:59	65.1
286	2021/02/11	12:07:02	61.4
287	2021/02/11	12:07:05	62.7
288	2021/02/11	12:07:08	60.8
289	2021/02/11	12:07:11	54.1
290	2021/02/11	12:07:14	60.3
291	2021/02/11	12:07:17	64.3
292	2021/02/11	12:07:20	68.4
293	2021/02/11	12:07:23	67.4
294	2021/02/11	12:07:26	61.6
295	2021/02/11	12:07:29	55.6
296	2021/02/11	12:07:32	50.9
297	2021/02/11	12:07:35	49.5
298	2021/02/11	12:07:38	50.0
299	2021/02/11	12:07:41	49.6
300	2021/02/11	12:07:44	65.0

Appendix D

Responses to Comments

Responses to Comments on the IS-MND

This section includes comments received during the circulation of the Draft IS-MND prepared for the Escondido Creek Trail Expansion and Renovation Project (proposed project), and responses to those comments relevant to the environmental analysis.

The Draft IS-MND was circulated for a 30-day public review period that began on February 18, 2022 and ended on March 21, 2022. Pursuant to a request by the California Department of Fish and Wildlife (CDFW), the City granted a three-day extension of the public review period to until March 24, 2022. The City of Escondido received two comment letters on the IS-MND. The commenters and the page number on which each commenter's letter appear are listed below.

Letter No. and Commenter	Page No.
1 Maurice Eaten, Branch Chief, California Department of Transportation (Caltrans)	D-2
2 David Mayer, Environmental Program Manager, CDFW	D-13

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.2, for example, indicates that the response is for the second issue raised in comment Letter 1). Changes to the IS-MND are indicated in ~~striketrough~~ and underline.

California Department of Transportation

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March 21, 2022

11-SD-15, 78
 PM VAR
 Escondido Creek Trail
 MND/SCH# 2022020438

Mr. Sean Nicholas
 Principal Planner
 City of Escondido
 201 North Broadway
 Escondido, CA 92025

Dear Mr. Nicholas:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the Escondido Creek Trail Project located near Interstate 15 (I-15) and State Route 78 (SR-78). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

1.1

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of Escondido in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections

1.1 (cont.) between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Traffic Operations

Since "Table 1" and first paragraph of page 5 state possible improvements to the trail on Caltrans' Right-of-Way (R/W), please submit the following:

- Any improvement within Caltrans' R/W will require an encroachment permit approval for any fencing, potable water features, fitness stations, bike racks, light fixtures, vines landscaping, and tree landscaping.
- 1.2 • All of Escondido Creek Trail project construction will be accessed through local street. There will be no access from Caltrans' R/W or freeway ramps. If there is a need for access through Caltrans' R/W then an Encroachment Permit approval is required.
- If construction of the trail requires traffic control on Caltrans' R/W then an Encroachment Permit approval is required.

Design

- 1.3 • Please confirm if there are plans to change anything within the Caltrans' R/W.
- What is planned to stop pedestrians/bicyclists from crossing SR-78? Caltrans does not allow pedestrians or bicyclists to cross freeway travel lanes.
- 1.4 • Consultation with Caltrans will be required to ensure pedestrian and bicyclist movements are provided for in a safe manner in accordance with Caltrans standards and guidelines.

Hydrology and Drainage Studies

- 1.5 • Please provide off site hydrology and hydraulics studies, proposed drainage and proposed grading plans for Caltrans to review.
 - Provide drainage plans and details. Provide existing and proposed drainage facilities.
 - Provide existing and proposed 2-foot contour grading with legible callouts.
 - Include detention basin details of inlets/outlet and proposed basin grading, include in detention basin calculations:
 - Plan schematic
 - Elevation vs storage tables
 - Elevation vs area tables
 - Elevation vs outlet flow (stage - outflow)
 - Inflow vs outflow

1.5
(cont.)

- Elevation vs time (stage - time)
- Volume vs time (storage - time)
- Provide a Drainage Study showing 100-year storm event calculations and 25- year storm event calculations.
- Provide on-site hydrology and hydraulic studies per the Highway Design Manual methodologies and per Caltrans policies and procedures.
 - Provide all available Caltrans drainage facility as-built and R/W Maps.
 - Provide survey data of onsite system that the development will be draining to.
- On all plans, show Caltrans' R/W and I-15/SR-78 centerline.
- Early coordination with Caltrans is recommended.
- Caltrans generally does not allow development projects to impact hydraulics within the State's Right-of-Way. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.
- Provide project concurrence from the Local Floodplain Administrator.

Complete Streets and Mobility Network

1.6

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of Escondido is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

Land Use and Smart Growth

1.7

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State

1.7 (cont.) transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies.

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

Traffic Control Plan/Hauling

1.8 The California Department of Transportation (Caltrans) has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at:

<http://www.dot.ca.gov/trafficops/permits/index.html>

A Traffic Control Plan is to be submitted to Caltrans District 11, including the I-15 and SR-78 locations near the Escondido Creek Trail at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (I-15 and SR-78) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

Noise

1.9 The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, the Department of Transportation (Caltrans) is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-15 and SR-78.

Maintenance

1.10 Headquarters Structures and Maintenance will need to be involved in the review of the proposed creek trail improvements under the I-15 overpass.

1.10
(cont.)

Caltrans has a Freeway Maintenance Agreement (FMA 11-8110) with the City of Escondido which should cover the portion of the trail within State R/W for I-15 (see Exhibit A, sheet 15 attached). That particular exhibit sheet may need to be amended, depending on the scope of the improvements. Caltrans does not have a Maintenance Agreement covering the portion of the trail which passes through State R/W for SR-78. A Maintenance Agreement (MA) would need to be created for a new project specific MA with the City of Escondido for that location.

Environmental

1.11

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the EIR that Caltrans will use for our subsequent environmental compliance.

1.12

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

Broadband

1.13

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The

- 1.13 (cont.) | availability of affordable and reliable, high speed broadband is a key component in supporting travel demand management and reaching the state's transportation and climate action goals.

Right-of-Way

- 1.14 | • Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- 1.15 | • Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Kimberly Dodson, LDR Coordinator, at (619) 985-1587 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review

Attachment: Exhibit A Sheet 15 of FMA between Caltrans and City of Escondido

Letter 1

COMMENTER: Maurice Eaten, Branch Chief, California Department of Transportation (Caltrans)

DATE: March 21, 2022

Response 1.1

The commenter states the mission and strategic goals of Caltrans regarding provision of a safe and reliable transportation network. The commenter affirms Caltrans' commitment to projects that are equitable and provide benefits to underserved communities, and looks forward to working with the City of Escondido with the goal of improving the transportation network.

The commenter's statements regarding Caltrans' mission, goals, and project commitments are noted.

Response 1.2

The commenter states that the project includes possible trail improvements to the Caltrans's Right-of-Way (R/W), and an encroachment permit approval is required for the following circumstances:

- Any improvement within Caltrans's R/W, including fencing, potable water features, fitness stations, bike racks, light fixtures, vines landscaping, and tree landscaping.
- If there is a need for construction access through the Caltrans R/W.
- If project construction requires traffic control on Caltrans' R/W.

As discussed on page 5 of the Draft IS-MND the project would include new fencing, potable water features, landscaping, light fixtures, and bike racks along the trail, in addition to trail construction. None of these features are proposed to occur within Caltrans R/W. Construction of the trail and project features would be required to comply with all existing regulations and obtain all necessary permits, including encroachment permits for work within Caltrans R/W, as applicable. No changes to the IS-MND are warranted.

Response 1.3

The commenter requests confirmation as to whether there are plans to change anything within the Caltrans R/W. All improvements along the path would occur within the City's R/W. The project does not plan to change anything within the Caltrans R/W.

Response 1.4

The commenter inquires what would prevent pedestrians or bicyclists from crossing State Route (SR) 78, and states that consultation with Caltrans would be required to ensure pedestrian and bicyclist movement occurs in a safe manner consistent with Caltrans guidelines. SR 78 (Ash Street) passes over the trail corridor; thus, pedestrians and bicyclists would not cross SR 78. Trail users would cross under the highway using the trail underneath the freeway travel lines. The City acknowledges that Caltrans consultation would be required to ensure pedestrian and bicyclist movement is consistent with applicable Caltrans standards and guidelines.

Response 1.5

The commenter requests the City provide the following hydrology and drainage studies for the project:

- Drainage plans and details, including existing and proposed drainage facilities
- Existing and proposed 2-foot contour grading with legible callouts
- Detention basin details on inlets/outlets and proposed basin grading, including plan schematic, elevation versus (vs.) storage tables, elevation vs. area tables, elevation vs. outlet flow, inflow vs. outflow, elevation vs. time, and volume vs. time.
- A Drainage Study showing 100-year storm event calculations and 25-year storm event calculations
- On-site hydrology and hydraulic studies per the Highway Design Manual methodologies and Caltrans procedures, which should include all available Caltrans drainage facility as-built and R/W maps, and survey data of the on-site system that the development would drain to

The commenter requests that the Caltrans' R/W and Interstate 15 (I-15)/SR 78 centerline be delineated on all plans. The commenter recommends early coordination with Caltrans and requests project concurrence from the Local Floodplain Administrator.

The commenter's request for the specified drainage, hydrology, and hydraulic plans or studies is noted. As discussed in Section 10, *Hydrology and Water Quality*, of the IS-MND, as a result of existing site conditions, required construction permits, and consistency with applicable planning documents (such as the City's General Plan, Urban Water Management Plan, and Federal Emergency Management Agency flood maps) the project would have less than significant impacts to hydrology and water. The requested studies are not required for CEQA evaluation, as the IS-MND did not determine that further hydrologic study is required. However, if the project would occur in the Caltrans R/W the City would work directly with Caltrans regarding project coordination and provision of the appropriate hydrologic studies and plans prior to project development.

Response 1.6

The commenter states their support of improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements. The commenter mentions Caltrans' implementation of Complete Streets and Climate Change policies into State Highway Operations and Protection Program projects to meet multimodal transportation needs and achieve the State's climate change target, and the commenter looks forward to working with the City to evaluate potential Complete Streets projects. The commenter encourages early coordination with Caltrans and states that mitigation to maintain transit access during construction is consistent with Caltrans's goals and policies.

The commenter's support for improved transit accommodation is noted. Should project construction block the trail, the City would provide an alternative route for safe bicyclist, pedestrian, and public transit access during construction consistent with Caltrans goals and policies. The City would coordinate with Caltrans for implementation of any potential Complete Streets projects in Caltrans jurisdiction.

Response 1.7

The commenter states the importance of the link between transportation and land use and provides their support of collaboration with local agencies to work towards a safe, functional transportation network. The commenter encourages coordination with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

The commenter's support for collaboration with local agencies is noted. The City will continue to work with Caltrans to implement necessary intersection improvements for future projects. The comment does not pertain to the adequacy of the IS-MND or CEQA process; as such, further response is not required.

Response 1.8

The commenter states that Caltrans has discretionary authority with respect to highways under its jurisdiction and may issue a special transportation permit for oversize or overweight vehicles on the State Highway Network. The commenter requests submittal of a Traffic Control Plan to Caltrans District 11, including the I-15 and SR 78 locations near the Escondido Creek Trail, at least thirty days before the start of construction. That commenter states that the plan shall outline suggested detours to use during closures and include routes and signage. Potential impacts to highway facilities or the traveling public due to construction activities should be addressed and discussed with Caltrans before construction work begins.

The City would work with Caltrans to procure any special transportation permit that is required for oversize or overweight vehicles prior to commencement of construction activities. The commenter's request for the specified Traffic Control Plan is noted. The City will work with Caltrans District 11 to prepare a Traffic Control Plan if appropriate for the project.

Response 1.9

The commenter states that Caltrans is not responsible for existing or future traffic noise impacts associating with the existing configuration of Interstate 15 and SR-78. The commenter's statement is noted. Noise impacts for the project were evaluated in Section 13, *Noise*, of the Draft IS-MND and were determined to be less than significant with implementation of Mitigation Measures N-1 through N-3 related to construction noise.

Response 1.10

The commenter states that Headquarters Structures and Maintenance would need to be involved in the review of the proposed project under the I-15 overpass. Caltrans has a Freeway Maintenance Agreement (FMA 11-8110) with the City of Escondido, which covers the portion of the proposed project within R/W for I-15. FMA 11-8110 may need to be amended, depending on scope of improvements. A Maintenance Agreement (MA) would need to be created for a new project-specific MA for the portion of the proposed project that passes through R/W for SR-78.

The commenter's request for the specified Maintenance Agreement is noted. The City will work with Caltrans to involve Headquarters Structures and Maintenance for the trail improvements under the I-15 overpass. This comment does not pertain to the adequacy of the IS-MND or the CEQA process; as such, further response is not required.

Response 1.11

The commenter states that Caltrans welcomes the opportunity to be a Responsible Agency under CEQA. The commenter would like to ensure Caltrans can adopt the alternative and/or mitigation measures for R/W as part of the encroachment permit process, and would like to meet to discuss EIR elements it can use for subsequent environmental compliance.

The commenter's recognition of Caltrans as a Responsible Agency for the project is noted. The City acknowledges that Caltrans would be a Responsible Agency if an encroachment permit is required for the project, and the City would work closely with Caltrans for any work that would require Caltrans' review or approval.

Response 1.12

The commenter states that because an encroachment permit would be required for any work within Caltrans' R/W prior to construction, the City must provide approved final environmental documents, corresponding technical studies, and necessary regulatory and resource agency permits. The commenter states that supporting documents must address all environmental impacts within the Caltrans' R/W, as well as any impacts from avoidance or mitigation measures, including impacts to the natural environment; infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps, and off-ramps; and appurtenant features including but not limited to lighting, signage, drainage, guardrail, slopes, and landscaping.

The City would work with Caltrans to determine all required documents, studies and permits needed for the project. All necessary documentation would be prepared and submitted to Caltrans prior to project construction.

Response 1.13

The commenter states that Caltrans recognizes teleworking and remote learning lessen traffic impacts upon roadways and communities, which reduces the amount of VMT, greenhouse gas emissions, and other pollutants. The commenter states that availability of affordable, reliable, high-speed broadband is a key component in supporting travel demand management and reaching California's transportation and climate action goals.

The City would work with Caltrans as necessary to confirm avoidance of impacts to broadband lines within Caltrans R/W. This comment does not pertain to the adequacy of the IS-MND or the CEQA process; as such, further response is not required.

Response 1.14

The commenter states that per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required if they would be destroyed during construction. The commenter's statement is noted. While no survey monuments are known to occur within the project footprint, the City would perpetuate any destroyed survey monuments in accordance with Business and Profession Code 8771. This comment does not pertain to the adequacy of the IS-MND or the CEQA process; as such, further response is not required.

Response 1.15

The commenter states any work performed within the R/W would require discretionary review and approval by Caltrans. An encroachment permit would be required for any work within Caltrans' R/W prior to construction.

Please refer to Response 1.1. Construction of the proposed project would be required to obtain all necessary permits, including an encroachment permit, for any work that would occur within the R/W.



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
 858-467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
 CHARLTON H. BONHAM, Director



March 24, 2022

Sean Nicholas
 Principal Planner
 City of Escondido
 201 North Broadway
 Escondido, CA 92025
snicholas@escondido.org

Dear Mr. Nicholas:

Escondido Creek Trail Expansion and Renovation Project (PROJECT)
 MITIGATED NEGATIVE DECLARATION (MND)
 SCH#: 2022020438

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced MND, dated February 18, 2022, for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

2.1

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered

¹ CEQA is codified in the California Public Resources Code in Section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with Section 15000.

Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

2.1
(cont.)

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City participated in the NCCP program by preparing a draft Escondido Subarea Plan (SAP) under the subregional North County Multiple Habitat Conservation Program (MHCP). However, the City's SAP has not been finalized and has not been adopted by the City or issued permits from the Wildlife Agencies (jointly, CDFW and the U.S. Fish and Wildlife Service (USFWS)).

PROJECT DESCRIPTION SUMMARY

Proponent: City of Escondido

Objective: The Project proposes to expand and renovate the Escondido Creek Trail in the City of Escondido. The existing trail is paved, open to pedestrians and cyclists, and requires improvements in terms of connectivity, safety, and aesthetics. The proposed trail would be double-sided, accommodating Class 1 bicycles on the existing paved trail and pedestrian uses on a new decomposed granite (DG) trail. The DG trail would be added further away from the Escondido Creek, with the existing paved trail closer to the creek bank. Along the trail in urban areas, the Project proposes to update trail fencing from a 6-foot chain link fence to a four-foot cable link fence, include landscaping with native plants, and add pedestrian features (e.g., water filling stations and outdoor fitness stations).

2.2

Currently, the existing multi-use trail extends from Harmony Grove Road to N. Midway Drive along Escondido Creek. Along the existing trail, the Project proposes landscaping by adding a decomposed granite path, native plants, and recreation services (e.g., water filling stations, fitness stations). In addition, the Project proposes to extend the western end of the trail south to Citracado Parkway by opening an existing utility road (0.4 mile). This new segment of the road is intended as a public bicycle path, which will require slurry seal and restriping of the existing roadway during construction. The new extension segment will not include landscaping activities (e.g., decomposed granite, planting, fencing, or lighting features).

Location: The Project site is an approximately 4.5-mile corridor along the banks of Escondido Creek in the City of Escondido. The western terminus of the corridor is near Citracado Parkway and the eastern terminus is N. Midway Drive. The western portion of the corridor (Citracado Parkway to N. Broadway) is surrounded by a mixture of industrial uses, residential development, institutional uses, and parkland. To the east of N. Broadway, surrounding land uses are predominantly residential and commercial.

Biological Setting: Per the MND, page 36, the Project corridor consists primarily of existing disturbed areas that run along the Escondido Creek channel. Between Harmony Grove Road and N. Midway Drive (4.2 miles), Escondido Creek is channelized with concrete and vegetation is primarily ruderal or ornamental. Native habitat within the Project corridor is limited to the downstream terminus (Citracado Parkway to Harmony Grove) including southern coast live oak riparian forest with adjacent upland areas comprised of open coast live oak woodland. Per Rincon Consultant's reconnaissance survey conducted in February 2021, no special-status plants or wildlife were detected within the Project corridor; however, the native habitat on the southwestern end is suitable for least Bell's vireo (*Vireo bellii pusillus*; Endangered Species Act (ESA)-listed Endangered, CESA-listed Endangered), western yellow bat (*Lasiurus xanthinus*; CDFW Species of Special Concern (SSC)), and coastal whiptail (*Aspidoscelis tigris stejnegeri*; CDFW SSC). In

addition, this segment of the corridor was mapped as Focused Planning Area (FPA) under the draft Escondido SAP and overarching MHCP.

Timeframe: The Project is expected to span approximately 6 months, from Fall 2022 through Spring 2024.

2.2
(cont.) CDFW received additional information via email from the City regarding the trail extension segment between Citracado Parkway and Harmony Grove Road. Per the City's March 6, 2022, email, "There are no lights, DG or fencing proposed on the west end of the Project. There are no improvements outside the existing paved maintenance road/trail edge on the west end between the proposed Citracado Bridge and Harmony Grove Road. There will be existing fence and gates replaced adjacent to the maintenance entrance on the north side of Harmony Grove, but no improvements beyond Harmony Grove Road right-of-way. In summary, the west end improvements for the Escondido Creek Trail Project is limited to existing gate replacement at Harmony Grove and striping the existing maintenance road which will also serve as the trail."

In addition, CDFW received additional information via email from Rincon Consultants regarding the status of least Bell's vireo and onsite habitat quality for this species, as well as Mexican fan palms proposed for removal.

COMMENTS AND RECOMMENDATIONS

2.3 CDFW offers the following comments and recommendations to assist the City in adequately avoiding, minimizing, and identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The MND should provide complete disclosure of the Project's potential impacts on biological resources. [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151]. In addition, the MND should follow the conservation guidelines and mitigation ratios outlined in the MHCP and draft SAP.

COMMENT #1: Bats

2.4 Per the MND, page 35, western yellow bat, a CDFW SSC, has potential to roost in the four Mexican fan palms that will be removed as part of the proposed Project. Per Rincon Consultants' March 15, 2022, email, "The Mexican fan palms are located further upstream in the concrete developed portion of the trail. No fan palms were detected along the natural portion of the trail alignment." Although the Mexican fan palms occur in the developed portion of the trail, if there were a maternity roost present in the trees, impacts to that roost site would be significant. Clearing of vegetation occupied by bats would result in direct take of the species. Modifications to roost sites can have significant impacts on bat usability of a roost and can impact bat fitness and survivability (Johnston et al. 2004). Extra noise and vibration can lead to the disturbance of roosting bats which may have a negative impact on the animals. Human disturbance can also lead to a change in humidity, temperatures, or the approach to a roost that could force the animals to change their mode of egress and/or ingress to a roost. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston et al. 2004). Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Western yellow bat is a California SSC and meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines § 15065). Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines § 15065).

Mitigation Measure #1: BIO-2 Pre-Construction Bat Acoustic Survey

To reduce impacts to less than significant: Because western yellow bat is an SSC, CDFW recommends that the Project proponent conduct two sets of bat surveys prior to the initiation of the Project. The first survey should occur during the bat roosting season within all suitable habitat to determine presence/absence of bat species and analyze the potential significance of tree removal. The second (pre-construction) survey should be conducted no less than 30 days prior to tree removal, to ensure no bats are roosting (e.g., day, night, maternity roosts) within the trees at the time of removal.

CDFW recommends the following amended language to BIO-2 to adequately survey and avoid Project impacts to western yellow bat and other bat species that may occur within the Project corridor:

~~"No less than 30 days prior to vegetation removal,~~ A qualified biologist with expertise and experience conducting bat surveys, shall be retained by the City as a Designated Bat Biologist.

CDFW recommends the Designated Bat Biologist conduct a bat survey within the Project corridor (plus a 100-foot buffer as access allows) to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts, especially within trees surrounding Escondido Creek. The survey shall occur during the roosting season (approximately March-September), using acoustic technology and emergency counts to maximize detection of bats on-site. Night roosts are typically utilized from the approach of sunset until sunrise. Maternity colonies, composed of adult females and their young, typically occur from spring through fall.

No less than 30 days prior to vegetation removal, the Designated Bat Biologist will conduct a pre-construction ~~reconnaissance~~ bat survey to identify within all trees or structures that provide suitable bat roosting habitat. If a maternity roost is determined present, a 300-foot no work buffer shall be placed around the roost and no work shall occur within the buffer until after the roosting season is over. Work may proceed after a qualified biologist is able to verify that the roost is no longer active."

COMMENT # 2. Light Pollution Impacts During and Post-Project Activities

The MND states that new lighting fixtures will be installed on the eastern end of the Project. In addition, construction and post-construction activities may increase noise and/or night-time lighting pollution impacts in a wildlife linkage area to levels likely to affect the behavior of the animal species identified in the Project corridor. Artificial light installed along the trail, in addition to lighting resulting from construction activities and post-construction, may negatively impact nesting-bird success by altering their timing of laying eggs. Streetlamps and other artificial lighting may cause birds to perceive days as longer than they are and cue nesting timing that is not consistent with their natural history and behavior. Typical nesting behaviors are timed to meet peak conditions for food availability; therefore, disruption of this process could result in nest abandonment and/or reduced reproductive success for nesting species within the Project corridor.

Avian species, including least Bell's vireo, and other wildlife species were identified as species likely to occur and/or nest in the Project corridor. Although mitigation measures are proposed to avoid the breeding and nesting bird season, artificial light used prior to, during, or after the breeding season can still negatively impact nesting birds by altering their nesting behavior. Lighting can also affect wildlife species utilizing the wildlife corridor.

Mitigation Measure #2: Avoidance and minimization measures for Project associated artificial lighting.

2.4
(cont.)

2.5

2.5
(cont.) **To reduce impacts to less than significant:** All Project-related artificial lighting installed on the trail should be anti-glare, shielded, and directed downward facing the trail and away from the adjacent habitat areas. Although no artificial lighting is proposed west of Harmony Grove Road, CDFW recommends any artificial lighting used during and post-construction should follow the same protocols (Citracado Parkway to Harmony Grove). Implementation of these measures will minimize artificial light effects on avian species, as well as other species that inhabit the area or utilize the riparian wildlife corridor area.

2.6 **COMMENT # 3. Trail Landscaping**
The MND states that the Project will plant 150 trees and create pollinator gardens along the Project corridor. CDFW recommends that the MND require that no invasive plant material be used for landscaping. A list of invasive/exotic plants that should be avoided can be found online at [Cal-IPC Invasive Plant Inventory](#).

ENVIRONMENTAL DATA

2.7 CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

FILING FEES

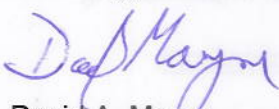
2.8 The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Alison Kalinowski, Environmental Scientist, at Alison.Kalinowski@wildlife.ca.gov.

Sincerely,



David A. Mayer
Environmental Program Manager
South Coast Region

Attachments

A. CDFW Comments and Recommendations

ec: State Clearinghouse, Sacramento, State.Clearinghouse@opr.ca.gov
Jennifer Ludovissy, CDFW, Jennifer.Ludovissy@wildlife.ca.gov
Jennifer Turner, CDFW, Jennifer.Turner@wildlife.ca.gov
David Mayer, CDFW, David.Mayer@wildlife.ca.gov
Alison Kalinowski, CDFW, Alison.Kalinowski@wildlife.ca.gov.
Jonathan Snyder, USFWS, Jonathan D Snyder@fws.gov

REFERENCES

- AMEC Earth and Environmental, Inc (AMEC). and Conservation Biology Institute (CBI). 2003. Volume II Final MHCP Plan Biological Analysis and Permitting Conditions. Available from: https://www.sandag.org/programs/environment/habitat_preservation/mhcp_vol2.pdf
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Sean Nicholas
City of Escondido
March 24, 2022
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Johnston D., Tatarian G., and Pierson E. 2004. California Bat Mitigation Techniques, Solutions and Effectiveness. Available from:
http://www.wildliferesearchassoc.com/wpcontent/uploads/2017/05/California_Bat_Mitigation_CalTrans_2004-1.pdf.

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Letter 2

COMMENTER: David Mayer, Environmental Program Manager, CDFW

DATE: March 24, 2022

Response 2.1

The commenter states that CDFW is California’s Trustee Agency for fish and wildlife resources, and that CDFW is submitting comments as a Responsible Agency under CEQA. As such, the proposed project is subject to CDFW regulatory authority. The commenter states that CDFW administers the Natural Community Conservation Planning (NCCP) program, and that the City prepared a draft Escondido Subarea Plan under the subregional north County Multiple Habitat Conservation Program, however, the Escondido Subarea Plan has not been finalized, adopted by the City, or issued permits from CDFW or United States Fish and Wildlife Service.

The City recognizes CDFW as a Responsible and Trustee Agency for the proposed project. The City would coordinate with CDFW for any work that would require the agency’s review or approval. The commenter’s statement regarding the Escondido Subarea Plan is noted.

Response 2.2

The commenter offers a summary of the project description, including existing conditions, proposed improvements, site location, biological setting, and timeframe. The commenter also provides additional information regarding the project description received from the City and Rincon Consultants, Inc. via e-mail.

The commenter’s summary of the proposed project is noted.

Response 2.3

The commenter offers a summary of comments and recommendations to assist the City in avoiding and minimizing impacts to biological resources. The commenter states that the environmental document should provide complete disclosure of the project’s impacts to biological resources, and follow conservation guidelines and mitigation ratios outlined in the draft Escondido Subarea Plan and Multiple Habitat Conservation Program.

The commenter’s recommendations are addressed in Responses 2.3-2.7. The IS-MND discloses project impacts to biological resources and the City would work with CDFW to ensure that conservation guidelines and mitigation ratios from applicable conservation plans are implemented.

Response 2.4

The commenter states that significant impacts to western yellow bat roost sites may occur if a maternity roost is present in the Mexican fan palms located in the developed portion of the trail. Clearing of vegetation may result in a direct take of the western yellow bat. The commenter recommends the project proponent conduct two sets of bat surveys prior to project initiation, as well as amending language within BIO-2 to adequately survey and avoid project impacts to the yellow western bat and other bat species.

Potential project impacts on western yellow bats were described in the Draft IS-MND. Mitigation Measure BIO-2 Pre-Construction Bat Acoustic Survey on page 36 of the Draft IS-MND has been amended in response to the commenter's concerns and suggestions, as follows:

BIO-2 Pre-Construction Bat Acoustic Survey

To the extent feasible, the City shall limit construction activities associated with the proposed trail improvements to outside of the typical bat roosting season, which extends from approximately March to September. No less than 30 days prior to vegetation removal, A qualified biologist (approved by CDFW) with expertise and experience conducting bat surveys, shall be retained by the City as a Designated Bat Biologist to conduct a two pre-construction reconnaissance surveys to identify trees or structures that provide suitable bat roosting habitat.

The Designated Bat Biologist shall conduct a bat survey within the project corridor (plus a 100-foot buffer as access allows) to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts, especially within trees surrounding Escondido Creek. The survey shall occur during the roosting season (approximately March-September), using acoustic technology and emergency counts to determine the presence maximize detection of bats roosts on site. Night roosts are typically utilized from the approach of sunset until sunrise. Maternity colonies, composed of adult females and their young, typically occur from spring through fall.

No less Within 30 60 days prior to construction vegetation removal, the a Designated qualified Bat Bbiologist will shall conduct a pre-construction reconnaissance bat survey of the queen palm trees to be removed and the Date Street pedestrian bridge structures near Date Street that provide suitable bat roosting habitat (plus 100-foot buffer as access allows) to identify the presence or absence of any night or maternity roosts. If a maternity roost is determined to be present, a Bat Mitigation and Avoidance Plan shall be developed for CDFW's approval. The Bat Mitigation and Avoidance Plan shall require a 300-foot no work buffer shall be placed around the roost and no work shall occur within the buffer until after the roosting season is over. Work may proceed after a qualified biologist is able to verify that the roost is no longer active.

Response 2.5

The commenter states that artificial lighting associated with new lighting fixtures may negatively impact nesting birds by resulting in nest abandonment or decreased reproductive success. Artificial lighting may also adversely impact wildlife species that move through the wildlife corridor. The commenter recommends adding a mitigation measure, *Avoidance and minimization measures for Project-associated artificial lighting*.

The City recognizes the commenter's concern regarding artificial lighting and glare impacts on sensitive species. As described on page 20, within Section 1, *Aesthetics*, of the Draft IS-MND, the proposed project would include shielded, pedestrian-scale lighting that complies with guidelines from the Trail Master Plan and standards within the Escondido Municipal Code. Guidelines from the Trail Master Plan require energy-efficient, durable, hooded lights that prevent spill onto adjacent properties. As required by the City of Escondido Municipal Code non-residential outdoor lighting would be energy-efficient, shielded low-pressure sodium, or narrow-spectrum amber LED lights. With adherence to the Trail Master Plan and the City's Municipal Code, the project would ensure that lighting fixtures would not significantly negatively impact nesting bird species or other wildlife

species. Lighting would be downcast and shielded as requested by the commenter. No additional mitigation for this impact would be necessary.

Response 2.6

The commenter recommends that the IS-MND require that invasive plant material shall not be used for landscaping, and provides the list of invasive/exotic plants found online at the Cal-IPC Invasive Plant Inventory.

The commenter's guidance regarding invasive plants is noted. The project has been designed to use native plants for landscaping. Invasive plant material would not be used. As stated on page 108 of the IS-MND, within Section 19, *Utilities and Service Systems*:

“Landscaping would consist of native plants and pollinator gardens that are largely drought-tolerant and require low water input.”

Therefore, native plants would be included as part of the project and additional requirements regarding nonnative landscaping plants are not necessary.

Response 2.7

The commenter requests that any special-status species and natural communities detected during project surveys are reported to the California Natural Diversity Database.

The commenter's request is noted. All data collected during the project surveys will be submitted to the California Natural Diversity Database in accordance with standard practices.

Response 2.8

The commenter reminds the City that as the project would impact fish or wildlife, payment of filing fees is necessary. Payment of this fee is required for project approval to be operative, vested, and final.

In accordance with Section 753.5 of the California Code of Regulations, the City will pay the required filing fee upon determination of the project.

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