Chapter 5 Other CEQA Considerations

CEQA Guidelines, Section 15128, requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a proposed project were found not to be significant and, therefore, would not be discussed in detail in the EIR. The City of Santee (City) reviewed the Fanita Ranch Project (proposed project) against the potential environmental issues contained in Appendix G of the CEQA Guidelines. Environmental issue areas found to have potentially significant impacts are addressed in Chapter 4, Environmental Impact Analysis, of this EIR. All environmental topical areas are addressed in Chapter 4, with the exception of Agricultural and Forestry Resources. This environmental issue area was determined to result in no impact from implementation of the proposed project and, thus, is addressed separately in Section 5.1, Effects Found Not to Be Significant.

In addition, Section 15126 of the CEQA Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must identify the following three components, which are also addressed in this chapter:

- Growth-inducing impacts of the proposed project (addressed in Section 5.2)
- Significant environmental effects that cannot be avoided if the proposed project is implemented (addressed in Section 5.3)
- Significant irreversible environmental changes that would be involved in the proposed project should it be implemented (addressed in Section 5.4)

5.1 Effects Found Not to Be Significant

The implementation of the proposed project does not have the potential to result in significant impacts related to the following checklist item, and therefore, further analysis in the EIR is not necessary.

5.1.1 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, and forest carbon measurement methods provided in the Forest Protocols adopted by the California Air Resources Board.

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

Pursuant to the California Department of Conservation Farmland Mapping and Monitoring Program, the project site is designated as Grazing Land. Grazing Land is defined as "land on which the existing vegetation is suited to the grazing of livestock" (DOC 2020). California Public Resources Code, Section 21060.1, defines agricultural land as "prime farmland, farmland of statewide importance, or unique farmland." Soils on the project site have been mapped by the U.S. Department of Agriculture (2020) and consist predominantly of portions of three soil series: Redding, Diablo, and Linne. The Redding and Diablo soils are the most common on site. The Linne soil is generally limited to smaller areas throughout the project site. Redding soil is composed of gravelly loamy soils that have a gravelly clay subsoil and a hardpan, while Diablo and Linne soils consist chiefly of deep clay loams derived from soft, calcareous sandstones and shale. The above soils do not meet the criteria for prime farmland or soils of statewide importance outlined in the U.S. Department of Agriculture's land inventory and monitoring program for San Diego area (2020). The project site does not support prime farmland, unique farmland, or farmland of statewide importance. Therefore, the proposed project would not impact classified farmland, either directly or indirectly, or result in the conversion of farmland to non-agricultural use. As such, no impact would occur to prime farmland, unique farmland, or farmland of statewide importance.

Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

As shown on the City's Zoning District Map (2017), no lands zoned for agricultural use are on the project site. The project site is zoned as Planned Development (PD). Further, the project site is not in the vicinity of any lands zoned for agricultural use. No lands affected by the proposed project are currently under a Williamson Act contract. Therefore, the proposed project would have no impact on a Williamson Act contract property or conflict with existing zoning for agricultural use.

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))?

Would the project result in the loss of forest land or conversion of forest land to non-forest use?

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?

As discussed previously, the project site does not support prime farmland, unique farmland, or farmland of statewide importance and would not involve other changes in the existing environment, which would result in conversion of farmland to non-agricultural use. In addition, the City has no designated forest land or timberland within its boundaries. The project site is not zoned for timberland production and is not in proximity to any lands zoned as Forest Land. The land area affected by the proposed project does not support forest land or timberland resources or operations. Therefore, no impact would occur from project implementation with regard to conflict with existing zoning for, or cause rezoning of, forest land or timberland, and the proposed project would not result in the potential loss or conversion of forest land to non-forest use.

5.2 Growth Inducement

As required by the CEQA Guidelines, an EIR must include a discussion of the ways in which the proposed project could directly or indirectly foster economic development or population growth or the construction of additional housing and how that growth would, in turn, affect the surrounding environment (14 CCR 15126.2[d]). Growth can be induced in a number of ways, including the elimination of obstacles to growth or through the stimulation of economic activity within the region. The discussion of removal of obstacles to growth relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval. According to CEQA Guidelines, Section 15126.2(d), "it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment." The analysis presented in this chapter discusses these factors.

A project can have direct or indirect growth inducement potential. Direct growth inducement can result from the construction of new housing that would result in new residents moving to an area. Indirect growth can be induced in a number of ways, including the stimulation of economic activity in the region that would result in the need for additional housing and services to support the new employment demand, or through the elimination of obstacles to growth, including both physical and regulatory obstacles. These topics are discussed in Sections 5.2.1 through 5.2.3. Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by adopted land use and growth management plans and policies for the area affected.

5.2.1 Population Growth from New Residences

The proposed project would develop a new residential community consisting of approximately 2,949 housing units under the preferred land use plan with school or 3,008 units under the land use plan without school and up to 80,000 square feet of commercial uses, parks, open space, and agriculture uses. This would result in a population increase of approximately 7,974 persons under the preferred land use plan with school or 8,145 persons under the land use plan without school, increasing the City's 2019 population of 58,408 to 66,382 or 66,553, respectively, at project buildout. The San Diego Association of Governments' population projections for the City are

based on the adopted Santee General Plan. The current designation of the project site as Planned Development (PD) in the Santee General Plan Land Use Element and the identification of the site to provide 1,395 units in the Santee General Plan Housing Element demonstrate that the site has been planned for residential growth by the City (City of Santee 2013). Using the 2.9 persons per household multiplier, a development project of 1,395 units could result in a population increase of approximately 4,045 residents. The difference between the planned and proposed land uses, when translated to persons per household, is approximately 3,929 and 4,100 persons under the preferred land use plan with school and the land use plan without school, respectively.

However, the project site has been subject to land use planning for the past 40 years, indicating that this site was planned for development even before it was part of the City. In 1980, the project site was designated in the County of San Diego (County) General Plan for development of approximately 14,000 residential units. When the City adopted its first General Plan (1984), the project site was designated for a maximum of 8,100 residential units. The number of residential units proposed on the project site has continued to vary over the years, with many proposals greater than the 2,949 residential units currently proposed, indicating the project site has been intended for population growth by the City and the County for many decades. In addition, the proposed project would include a General Plan Amendment to change the designation of the project site from Planned Development (PD) to Specific Plan (SP) and to increase the number of residential units on the site up to 2,949 with a school, which would be consistent with the Santee General Plan Housing Element, as amended.

Further, the production of housing in California would need to be approximately 100,000 additional residential units annually to meet projected housing demand (HCD 2018). In the County, the San Diego Association of Governments projected that housing production at the regional level will not be able to keep pace with population growth in the coming years. Because new development in the County is constrained to the north by Camp Pendleton, to the west by the Pacific Ocean, and to the south by Mexico, the proposed project would be beneficial to County residents because it would contribute to the overall County housing stock. Construction of the proposed project is anticipated to begin in 2021 with a buildout of approximately 10 to 15 years. Thus, based on a conservative estimate and averaged over 10 years, the 7,974 to 8,145-person population increase would equate to approximately 797 to 815 new residents per year, which would be consistent with the City's historical population increases (see Table 4.13-4, City Population Increases, in Section 4.13, Population and Housing). In the context of the housing shortage currently experienced by the state and the San Diego region, the provision of new housing on the project site would be considered growth accommodating and would represent a regional benefit.

In addition, the San Diego Association of Governments' 5th Cycle Regional Housing Needs Assessment has identified housing needs based on income level for the City. The Santee General Plan Housing Element lists the project site as the only source for above moderate income

residential units (City of Santee 2013). Other sites are identified to meet Regional Housing Needs Assessment requirements for the other income levels. The proposed project would satisfy the Regional Housing Needs Assessment requirements for above moderate residential units and provide additional residential units to meet the anticipated future deficiencies in the City.

Further, the widening of State Route 52 from Cuyamaca Street to State Route 67 has contributed to the loss of housing in the City. This project resulted in the loss of approximately 199 residential units as of 2006, which the proposed project would replace (Poucel 2006). Therefore, the preferred land use plan with school and land use plan without school would not contribute to unplanned population growth. The physical environmental impacts associated with the proposed project's construction and operation as a residential community are analyzed in Sections 4.1 through 4.18 of this EIR.

5.2.2 Economic Growth from New Jobs

In addition to direct growth, additional indirect growth could occur as new businesses are established or existing businesses expand, thus creating new sources of employment. Increased industrial, commercial, and residential development typically generates a secondary or indirect demand for other services, such as groceries, entertainment, and medical services, that would stimulate economic activity. The proposed project involves private residential development, commercial, and recreational development and would generate jobs and economic activity. Based on a factor of 2.9 persons per household and 1.6 persons per Active Adult unit, the proposed project would be expected to generate approximately 7,974 to 8,145 persons within the expected 10- to 15-year buildout time frame of the proposed project. The additional population would increase activity in nearby retail establishments and generate demand for such services as child care, landscaping, gardening, pest control, home cleaning, and other maintenance services. The proposed project also proposes to develop approximately 80,000 square feet of commercial space and employment opportunities, which is expected to generate approximately 450 jobs under the preferred land use plan with school and approximately 200 jobs under the land use plan without school. In addition to the commercial facilities available on the project site, project residents are anticipated to frequent existing retail and commercial services already available in the City.

The Santee General Plan Update Market Analysis was performed concurrently with the development of the Santee General Plan EIR. The analysis found that the development of the project site would be a potential generator of sales tax for the City. It also concluded that developing the site is critical to the City's financial future because it would generate (in 2003 dollars) an estimated $39 million in retail sales, with an estimated $30 million staying in the City, and would provide a significant stock of housing, which would benefit the City's efforts to attract higher-end firms and employers (City of Santee 2003). Because this economic activity generated by the proposed project is the expected result of planning for the ultimate development of the City

through the Santee General Plan, it would not result in a significant adverse impact. The proposed project is expected to result in increased economic activity in the City and the region.

In addition, the Planned Development (PD) land use designation in the Santee General Plan for the project site allows for a variety of mixed-use development types, including commercial uses. The proposed project proposes to change this designation to Specific Plan (SP), which would allow the same types of uses. The Planned Development (PD) land use designation also allows for innovative and high-quality development and does not limit the extent or mix of development to occur, which allows greater flexibility to provide a variety of land uses. Thus, development of commercial uses on the project site resulting in economic growth is an expected and planned outcome of development of the site. Therefore, the proposed project would not contribute to unplanned economic growth inducement in the City.

5.2.3 Removal of Obstacles to Growth

The elimination of either physical or regulatory obstacles to growth is considered a growth-inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The proposed project would trigger growth if it would result in infrastructure with excess capacity or if it would remove an obstacle to growth in an area, such as providing infrastructure that was previously not available. Infrastructure elements such as sewer and water lines, streets, and drainage facilities would connect the project site with existing development. The proposed extensions of Fanita Parkway, Cuyamaca Street, and Magnolia Avenue are included in the Santee General Plan Mobility Element and would facilitate residential development contemplated in the Santee General Plan Land Use Element. Therefore, the planned extension of these streets would be growth accommodating because this growth is already planned for in the Santee General Plan.

Further, most adjacent undeveloped land is already constrained and protected from development; these areas include the Padre Dam Municipal Water District Ray Stoyer Water Recycling Facility, Santee Lakes Recreation Preserve, Goodan Ranch/Sycamore Canyon County Preserve, and Marine Corps Air Station Miramar. All of the proposed project's off-site utility and street connections would be south and west in developed areas of the City. Development of new infrastructure on the project site would not result in expansion to these areas. The proposed project would not eliminate any regulatory obstacles to growth. Therefore, the proposed project would not result in growth inducement due to the elimination of physical or regulatory obstacles to growth.

5.3 Significant and Unavoidable Environmental Impacts

Pursuant to Section 15126.2(b) of the CEQA Guidelines, this section identifies significant impacts that would not be avoided, even with the implementation of feasible mitigation measures. The final determination of significance of impacts and of the feasibility of mitigation measures will be made

by the Santee City Council as part of their certification action for the EIR. Sections 4.1 through 4.18 of this EIR provide a comprehensive identification of the proposed project's potentially significant adverse environmental effects and any necessary mitigation measures, as well as the level of significance both before and after mitigation. A summary of the environmental impacts and mitigation measures is contained in the Executive Summary at the beginning of this EIR. Mitigation measures have been identified that would reduce some potentially significant environmental impacts to a less than significant level. Based on the analysis in Sections 4.1 through 4.18 of this EIR, significant and unavoidable environmental impacts associated with the proposed project were identified for air quality, noise, recreation, transportation, and utilities and service systems.

5.4 Significant Irreversible Environmental Effects

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

> Uses of nonrenewable resources during the initial and continued phases of the Project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The proposed project would involve a large commitment of nonrenewable resources;
- The proposed project involves uses in which irreversible damage would result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Development of the proposed project would result in the commitment of the project site to residential and community serving uses. Restoration of the project site to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment that would result from implementation of the proposed project. The on-site physical effects of project implementation are addressed in Sections 4.1 through 4.18 of this EIR. In general, conversion of a portion of the project site from undeveloped land to urbanized uses

(paved roadways and graded lots with structures and landscaping) would represent a permanent, irreversible change to the project site. Project construction and maintenance of the buildings and infrastructure proposed would require the commitment of energy, natural resources, and building materials. Nonrenewable and limited resources that would be consumed with project development would include oil, natural gas, gasoline, lumber, sand and gravel, asphalt, aggregate, water, steel, and similar materials. Nonrenewable fuels would be used by construction equipment, haul trucks, and worker vehicles. Nonrenewable energy also would be expended during the harvesting and on-site reuse of natural resources such as wood and aggregate and during the subsequent manufacturing of construction materials such as wood framing and concrete. This commitment of resources and energy would be commensurate with that of other projects of similar size but would nevertheless be irretrievable. Post-construction consumption of nonrenewable resources would include the use of electricity, natural gas, and water by project residents, employees, and visitors. This energy use would be a long-term commitment and irretrievable but not wasteful given the many sustainable features of the proposed project (see Section 3.8, Smart Growth and Sustainability Features, in Chapter 3, Project Description).

5.5 References

City of Santee. 2003. Santee General Plan. Adopted August 27.

City of Santee. 2013. "City of Santee Housing Element 2013–2021." In Santee General Plan. Adopted April 10.

City of Santee. 2017. City of Santee Zoning District Map. Adopted August 27, 2003, under Resolution 63-2003. Updated July. Accessed May 2020. http://cityofsanteeca.gov /home/showdocument?id=8549.

DOC (California Department of Conservation). 1997. California Agricultural Land Evaluation and Site Assessment Model.

DOC. 2020. Farmland Mapping and Monitoring Program. Accessed May 2020. https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx.

HCD (California Department of Housing and Community Development). 2018. California's Housing Future: Challenges and Opportunities, Final Statewide Housing Assessment 2025. February. Accessed May 2020. http://www.hcd.ca.gov/policy-research/plans-reports/docs/SHA_Final_Combined.pdf.

Poucel, Rebecca A. 2006. Update of the Final Relocation Impact Report Dated 10/2003. January 9.

USDA (U.S. Department of Agriculture). 2020. Web Soil Survey Interactive Soil Map. Accessed April 2020. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.