EXHIBIT A
CEQA FINDINGS OF FACT

The California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) (CEQA) requires that public agencies shall not approve or carry out a project for which an environmental impact report ("EIR") has been certified that identifies one or more significant adverse environmental effects of a project unless the public agency makes one or more written Findings for each of those significant effects, accompanied by a brief explanation of the rationale for each Finding (State CEQA Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq.], § 15091). This document presents the CEQA Findings of Fact made by City of Santee, in its capacity as the CEQA lead agency, regarding the City of Santee Town Center Specific Plan Update ("Project"), evaluated in the Draft Environmental Impact Report ("Draft EIR") and Final Environmental Impact Report ("FEIR") for the Project.

SECTION I.
INTRODUCTION

Public Resources Code section 21002 states that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" Section 21002 further states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects."

Pursuant to section 21081 of the Public Resources Code, a public agency may only approve or carry out a project for which an EIR has been completed that identifies any significant environmental effects if the agency makes one or more of the following written finding(s) for each of those significant effects accompanied by a brief explanation of the rationale for each finding:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.

2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

As indicated above, section 21002 requires an agency to "avoid or substantially lessen" significant adverse environmental impacts. Thus, mitigation measures that

"substantially lessen" significant environmental impacts, even if not completely avoided, satisfy section 21002's mandate. (*Laurel Hills Homeowners Assn. v. City Council* (1978) 83 Cal.App.3d 515, 521 ["CEQA does not mandate the choice of the environmentally best feasible project if through the imposition of feasible mitigation measures alone the appropriate public agency has reduced environmental damage from a project to an acceptable level"]; *Las Virgenes Homeowners Fed., Inc. v. County of Los Angeles* (1986) 177 Cal. App. 3d 300, 309 ["[t]here is no requirement that adverse impacts of a project be avoided completely or reduced to a level of insignificance . . . if such would render the project unfeasible"].)

While CEQA requires that lead agencies adopt feasible mitigation measures or alternatives to substantially lessen or avoid significant environmental impacts, an agency need not adopt infeasible mitigation measures or alternatives. (Pub. Resources Code, § 21002.1(c) [if "economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency"]; see also State CEQA Guidelines, § 15126.6(a) [an "EIR is not required to consider alternatives which are infeasible"].) CEQA defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, § 21061.1.) The State CEQA Guidelines add "legal" considerations as another indicia of feasibility. (State CEQA Guidelines, § 15364.) Project objectives also inform the determination of "feasibility." (*Jones v. U.C. Regents* (2010) 183 Cal. App. 4th 818, 828-829.) "'[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) "Broader considerations of policy thus come into play when the decision making body is considering actual feasibility[.]" (*Cal. Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000 ("*Native Plant*"); see also Pub. Resources Code, § 21081(a)(3) ["economic, legal, social, technological, or other considerations" may justify rejecting mitigation and alternatives as infeasible] (emphasis added).)

Environmental impacts that are less than significant do not require the imposition of mitigation measures. (*Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1347.)

The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576.) In addition, perfection in a project or a project's environmental alternatives is not required; rather, the requirement is that sufficient information be produced "to permit a reasonable choice of alternatives so far as environmental aspects are concerned." Outside agencies (including courts) are not to "impose unreasonable

extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken." (*Residents Ad Hoc Stadium Com. v. Board of Trustees* (1979) 89 Cal.App.3d 274, 287.)

SECTION II.
FINDINGS REGARDING ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION

The City Council hereby finds that the following potential environmental impacts of the project are less than significant and therefore do not require the imposition of Mitigation Measures.

A. AESTHETICS

1. Scenic Vistas

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

Finding: Less than significant. (Draft PEIR, pp. 4.1-8 through 4.1-12)

Explanation: **Town Center Specific Plan (TCSP) Area**

Major views throughout the City include the San Diego River and surrounding mountains and hillsides. The City places a high value on protecting these views as they create a sense of place that defines the City. Future development and redevelopment could detract from existing scenic vistas and views.

Development at most sites within the TCSP area would constitute infill development resulting in development consistent with surrounding urbanization that would not affect existing views. While development of vacant parcels within the TCSP area would incrementally change the character of this area, views of the surrounding hillsides would continue to be visible from this low-lying area. Development of multi-family residential, multi-story commercial buildings, and multi-level parking garages would not create obstruction of views of the surrounding hillsides based on the location of development within the low-lying valley.

The proposed TCSP includes plans for a River Bridge to allow for multiple modes of transportation across the San Diego River. Conceptual plans for the River Bridge connect the footpaths north of Site 16A to the southern portion of Town Center Park East. While the River Bridge would be a noticeable feature in the San Diego River landscape, lookouts would also provide new opportunities for passive recreation and scenic enjoyment of the river valley. The TCSP includes objective design standards for the River Bridge that aim to minimize daytime shade and nighttime light spillover in protected habitat areas and preserve the scenic quality of the San Diego River.

Views of the San Diego River could be obstructed by future development, but development is not planned in areas that currently serve as designated scenic outlooks, such as Mast Park. Furthermore, compliance with design guidelines set forth in the General Plan and Santee Municipal Code (SMC), as described below, would result in less than significant impacts.

Both future ministerial and discretionary development would be required to adhere to relevant portions of the SMC including Chapter 13.08, et seq., which establishes the City's development review procedures. These procedures require the implementation of development review for projects that require a building permit. This review requires an evaluation of project consistency with development review criteria defined in Section 1308.070 including evaluation of the relationship of the building site to the surrounding area, landscaping design including design that ensures avoidance of potential for obstruction of views when landscaping is mature, grading design, signage, and lighting. In any instance where the TCSP conflicts with the requirements of the SMC, the TCSP provisions shall take precedence. Additional criteria is applicable to multi-family residential developments as follows:

- Site Buildings to Avoid Crowding. Where multiple buildings are proposed, the minimum building separation shall be 10 feet in accordance with Section 13.10.040(G).

- Site and Design Buildings to Avoid Repetitions of Building or Roof Lines. This may be achieved through variation in building setback; wall plane offsets; use of different colors and materials on exterior elevations for visual relief; and architectural projections above maximum permitted height in accordance with Section 13.10.050(C). The TCSP specifies building variation requirements in Objective Design Standard B, *First 30'*.

- In the Urban Residential (R-30) zone, for each 5-foot increase in building height over 45 feet, the wall plane shall be stepped back an additional 5 feet.

- Where adjacent to a single-family residential zone, design buildings to ensure a transition in scale, form, and height with adjacent residential properties. Setbacks are required in accordance with Table 13.10.040A. Designs may incorporate elements such as building massing and orientation, location of windows, building story stepbacks, building materials, deep

roof overhangs, and other architectural features that serve to further transition the scale.

- Projects shall be designed so that assigned parking spaces are located as close as practicable to the dwelling units they serve. Refer to Section 13.24.030(B) for additional parking standards.

- The visual impact of surface parking areas adjacent to public streets shall be minimized using mounded or dense landscape strips or low decorative masonry or stucco walls no more than 3.5 feet in height. Parking areas shall be treated with decorative surface elements to identify pedestrian paths, nodes, and driveways. The TCSP proposes additional requirements for surface parking, including a ratio of 1 tree planted for every 5 parking spaces, the addition of diamond planters after 6 parking spaces in a row, and a 3-foot minimum distance between parking and pedestrian walkways, which should be at least 5-foot wide.

In addition to the above design review requirements, development adjacent to the San Diego River would be subject to applicable Draft Subarea Plan setback and buffer requirements incorporated as in mitigation measure BIO-10 (refer to Section 4.4.6.2). Additionally, as detailed in SMC 13.08.010, the purpose of development review includes, but is not limited to, ensuring property is developed in a manner which respects the physical and environmental characteristics of each site and ensuring that each new development is designed to best comply with the intent and purpose of the zone in which the property is located and with the General Plan of the City. To that end, there are General Plan policies in the Community Enhancement and Conservation Elements of the City's General Plan that support preservation of scenic vistas. For example, future development is encouraged to preserve significant natural features, such as watercourses, ridgelines, steep canyons, and major rock outcroppings (City 2003b). Additionally, development within the TCSP area would be required to adhere to supplemental development regulations which include design guidelines for the planning area.

Overall adherence to applicable SMC development review and design requirements, in addition to proposed TCSP Objective Design Standards that relate to maximizing views of public amenities like the San Diego River, would ensure that future development would not have a substantial adverse effect on a scenic view or vista, and impacts would be less than significant.

Arts and Entertainment Neighborhood (AEN)

Similar to the TCSP area, major views visible from the AEN include the San Diego River and surrounding mountains and hillsides. Future development and redevelopment within the AEN could change the character of the area, but views of the surrounding hillsides would continue to be visible. Compliance with the General Plan, SMC, and proposed TCSP Objective Design Standards that relate to maximizing views of public amenities like the San Diego River would ensure that impacts to views of the San Diego River would be less than significant.

Housing Element Sites

Housing Element sites 16A, 16B, 20A, and 20B are largely undeveloped open lands that propose multi-family development at a higher density than current conditions.

Housing Site 16A

Housing Site 16A is currently a vacant parcel with a land use designation of Residential TC-R-30, which allows 30 to 36 dwelling units per acre (du/ac). The site is surrounded by existing development to the east and west but sits directly south of the San Diego River. Development of Site 16A could affect visibility to the San Diego River, but Site 16A is not a designated scenic resource or area intended for scenic enjoyment. Additionally, overall adherence to applicable SMC development review and design requirements, in addition to the objective design and performance standards proposed by the TCSP, such as connections to trails and open space, would ensure that future development would not have a substantial adverse effect on a scenic view or vista, and impacts would be less than significant.

Housing Site 16B

Housing Site 16B is currently a vacant parcel with a land use designation of Residential TC-R-14, which allows for 14 to 22 du/ac and is surrounded by existing development to the east, south, and west, and would be constructed south of Site 16A. While Site 16B has the potential to obstruct views of the San Diego River, overall adherence to applicable SMC development review and design requirements, in addition to proposed objective design and performance standards proposed by the TCSP, such as connections to trails and open space, would ensure that future development would not have a substantial adverse effect on a scenic view or vista, and impacts would be less than significant.

Housing Site 20B

Housing Site 20B is a mostly vacant parcel containing occasional asphalt and concrete foundations. The site has a land use designation of Residential TC-R-30. The site is surrounded by existing development to the east, south, and west, but has the potential to obstruct views of the San Diego River if buildout is completed at a taller height than Site 20A. Overall adherence to applicable SMC development review and design requirements, in addition to proposed objective design and performance standards proposed by the TCSP, such as connections to trails and open space, would ensure that future development would not have a substantial adverse effect on a scenic view or vista, and impacts would be less than significant.

2. Scenic Resources

Threshold: Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Finding: Less than significant. (Draft PEIR, pp. 4.1-13 through 4.1-14)

Explanation: **TCSP Area**

There are no designated State Scenic Highways within City limits. Only State Route (SR) 52 located west of the City is a designated State Scenic Highway, which also runs in an east-west direction approximately 2 miles east of the eastern project site boundary (California Department of Transportation [Caltrans] 2018). Distant views to portions of the TCSP are visible from SR 52.

Mission Gorge Road is designated as a Local Scenic Road in the City's General Plan (City 2003a), which establishes Mission Gorge Road Design Standards. The southern boundary of the TCSP area is immediately adjacent to Mission Gorge Road and would be visible from the roadway. Complying with the Design Standards in the General Plan and the TCSP to the maximum extent feasible would ensure that the aesthetic value of the areas adjacent to Mission Gorge Road is not impacted. Relevant objective design standards from the TCSP include orienting main front entries to the street, changing material or adding columns between multiple entries along the same frontage, and disallowing "back-of-house" uses such as refuse areas or utility closets to face the street. These standards would ensure that development visible from Mission Gorge Road would be visually interesting and site appropriate.

While development of the TCSP area could change the visual environment as viewed from surrounding locally scenic and state eligible roadways, the TCSP area is largely surrounded by urbanization and would represent infill development in a similar character to existing uses. Thus, while development would represent a visual change, it would not substantially change the predominant view of urbanization within the City. Distant views of the mountains would be retained as height limitations associated with each underlying zone would prohibit buildings of excessive height. Additionally, significant portions of the TCSP area, including the existing recreational uses north of the San Diego River and the San Diego River itself, would remain designated as open space. Impacts would be less than significant.

AEN

Similar to the TCSP area, the southern boundary of the AEN is immediately adjacent to Mission Gorge Road, therefore potentially changing the visual environment as viewed from the local scenic roadway. However, the AEN is largely surrounded by urbanization and would represent infill development, and development would comply with the Mission Gorge Road Design Guidelines. Relevant objective design standards from the TCSP include orienting main front entries to the street, changing material or adding columns between multiple entries along the same frontage, and disallowing “back-of-house” uses such as refuse areas or utility closets to face the street. These standards would ensure that development visible from Mission Gorge Road would be visually interesting and site appropriate. Distant views of the mountains would be retained as height limitations associated with each underlying zone would prohibit buildings of excessive height. Impacts would be less than significant.

Housing Element Sites

All Housing Element sites except for Site 20B would be sufficiently set back from Mission Gorge Road with intervening development such that they would not change the scenic environment as viewed from the roadway. Site 20B would be visible from Mission Gorge Road, but the site is largely surrounded by urbanization and would comply with the Mission Gorge Road Design Guidelines.

Additionally, all future development at the Housing Element sites would be subject to the requirement for Development Review consistent with SMC Chapter 13.08 which would ensure consistency with General Plan policies and applicable design and development review requirements including the objective design standards for the

TCSP area. Relevant standards include orienting main front entries to the street, changing material or adding columns between multiple entries along the same frontage, and disallowing "back-of-house" uses such as refuse areas or utility closets to face the street. These standards would ensure that development visible from Mission Gorge Road would be visually interesting and site appropriate. Application of these development review requirements would ensure protection of key scenic resources. Impacts would be less than significant.

3. Visual Character or Quality

Threshold: In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public view of the site and its surroundings?

Finding: Less than significant. (Draft PEIR, pp. 4.1-14 through 4.1-15)

Explanation: **TCSP Area**

The TCSP area is composed of vacant and non-vacant parcels in an urbanized area of the City. The TCSP creates new zoning standards for the TCSP area, including the San Diego River floodway, that would apply to new development and redevelopment activities. The TCSP also includes Objective Design Standards that strive to create a human-scale environment that is compatible with and enhances the surrounding area; specific standards include breaking up building massing, ensuring parking does not function as a standalone element, implementing pedestrian-friendly fixtures and landscaping, and preserving open space and recreational opportunities. Sign standards are also included to enhance community character and wayfinding throughout the TCSP area and assumes the ultimate relocation of the restored Santee Drive-In sign within the City-owned theater site in the Town Center Core. Future projects in the TCSP area would be reviewed for consistency with the standards and remaining applicable municipal code regulations mentioned in Section 4.1.5. No increase in density, height, bulk, or scale would occur, and the amount of protected open space in the community would not be reduced. Impacts would be less than significant.

AEN

Similar to the TCSP area, the AEN is composed of vacant and non-vacant parcels in an urbanized area of the City. The AEN would be subject to the TCSP zoning and design standards mentioned above, including breaking up building massing, ensuring parking does not function as a standalone element, implementing pedestrian-friendly

fixtures and landscaping, and preserving open space and recreational opportunities. Future projects would be reviewed for consistency with the standards and remaining applicable municipal code regulations mentioned in Section 4.1.5. No increase in density, height, bulk, or scale would occur, and the amount of protected open space in the community would not be reduced. Impacts would be less than significant.

Housing Element Sites 16A, 16B, and 20B

Development with residential at the Housing Element sites could affect the visual character and quality of views toward the San Diego River. However, development would be subject to development review consistent with SMC Chapter 13.08 which would ensure consistency with General Plan policies and applicable design and development review requirements including supplemental development regulations. Relevant Objective Design Standards from the TCSP include breaking up building massing, ensuring parking does not function as a standalone element, implementing pedestrian-friendly fixtures and landscaping, and preserving open space and recreational opportunities, as detailed in Section 4.1.2.3.

4. Light and Glare

Threshold: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Finding: Less than significant. (Draft PEIR, pp. 4.1-16)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

Development of the TCSP area, AEN, and Housing Element sites could introduce new sources of light and glare from increased development intensity. However, the TCSP area is in an urbanized area and light introduced with new development would be similar to existing sources of light. Additionally, development of the Housing Element sites would be required to comply with SMC standards related to light and glare (Chapter 13.08.070(G)), which requires that outdoor lighting be directed away from adjacent properties and set in a way to avoid any detriment to the surrounding area. Additionally, the Community Enhancement Element includes the standard for lighting and signage to minimize spillover of lighting through use of directional, cut-off and nonglare fixtures. General Plan policies would be implemented through the required development review process. Impacts would be less than significant.

B. AGRICULTURE AND FORESTRY RESOURCES

1. Farmland Conversion

Threshold: Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide significance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Finding: No impact. (Draft PEIR, p. 4.2-6)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

While parts of the TCSP area, AEN, and Housing Element sites contain land that qualify as Farmland of Local Importance, no portion of the project area has been used as farmland since at least 1980, when aerial imagery shows that the Town Center area was graded, likely in preparation for the further urban development seen in 1995 and 2000 aerial photographs (HELIX 2024b). The project area is planned for urban development in the City of Santee General Plan and has been zoned for urban uses since the 1986 TCSP was adopted. Although the areas designated as Farmland of Local Importance have generally remained vacant and filled with dirt, standing water, or sparse vegetation, some portions of the areas and surrounding sites have been developed with urban uses. No agricultural uses have reemerged on the project site since farming ceased in the late 1900s, as visible in more recent aerial imagery. Because there are no current or planned agricultural uses in the project area, the proposed project would not result in impacts to conversion of farmland in the TCSP area, AEN, or Housing Element sites. Impacts would be less than significant.

2. Agricultural Zoning

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

Finding: No impact. (Draft PEIR, p. 4.2-7)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

No zoning or land use designations that are focused on agricultural use occur within the boundaries of the TCSP area, AEN, or Housing Element sites. Agricultural uses are allowed under special circumstances in the park/open space land associated with the San Diego River, but no agricultural uses exist or are planned for the area according to the TCSP. There are no recent or current Williamson Act

contract lands within the project site. There would be no conflicts with agricultural zoning or Williamson Act contracts in the TCSP area, AEN, or Housing Element sites as a result of the proposed project.

3. Forestland Zoning

Threshold: 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)?

Finding: No impact. (Draft PEIR, p. 4.2-7)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

The TCSP area, AEN, and Housing Element sites do not contain any areas zoned as Timberland or Timberland Production. Therefore, no associated impacts in the TCSP area, AEN, or Housing Element sites would result from the implementation of the proposed project.

4. Loss or Conversion of Forest Land

Threshold: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

Finding: No impact. (Draft PEIR, p. 4.2-8)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

The TCSP area, AEN, and Housing Element sites do not contain any areas identified as forest resources under California Department of Forestry and Fire Protection ([CAL FIRE] 2024) or City policies and guidelines. Therefore, no associated impacts to forest land in the TCSP area, AEN, or Housing Element sites would result from implementation of the proposed project.

5. Conversion of Farmland or Forestland

Threshold: 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?

Finding: No impact. (Draft PEIR, p. 4.2-8)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

Based on the previous impact discussions and that no active Farmland or Forest land exists or is zoned in the vicinity of the project area, the project would not result in conversion of Farmland or Forest land within, or in the vicinity of, the TCSP area, AEN or Housing Element sites, and no associated farmland conversion impacts would occur from the implementation of the proposed project.

C. AIR QUALITY

1. Consistency with Air Quality Plans

Threshold: Would the project conflict with or obstruct the implementation of the applicable air quality plan, i.e., the San Diego Regional Air Quality Strategy (RAQS)?

Finding: Less than significant. (Draft PEIR, pp. 4.3-13 through 4.3-15)

Explanation: The Attainment Plan outlines the San Diego Air Pollution Control District's (SDAPCD's) plans and control measures designed to attain the National Ambient Air Quality Strategy (NAAQS) for ozone. In addition, the SDAPCD relies on the State Implementation Plan (SIP), which includes the SDAPCD's plans and control measures for attaining the ozone NAAQS. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the U.S. Environmental Protection Agency (USEPA) and California Air Resources Board (CARB), and the emissions and reduction strategies related to mobile sources are considered in the Attainment Plan and SIP.

The Attainment Plan relies on information from CARB and San Diego Association of Governments (SANDAG), including projected growth in the County and mobile, area, and all other source emissions, to project future emissions and determine the strategies necessary for the reduction of stationary source emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by cities and the County. As such, projects that propose development consistent with the growth anticipated by the local general plans would be consistent with the Attainment Plan. If a project proposes development which is less dense than anticipated within the applicable General Plan, the project would likewise be consistent with the Attainment Plan. If a project proposes

development that is greater than that anticipated in the applicable General Plan and SANDAG's growth projections upon which the Attainment Plan is based, the project may be in conflict with the Attainment Plan and SIP and may have a potentially significant impact on air quality. This situation would warrant further analysis to determine if the project and the surrounding projects exceed the growth projections used in the Attainment Plan for the specific subregional area.

TCSP Area

As described above, the Attainment Plan and San Diego RAQS outlines the steps needed to accomplish attainment of NAAQS and California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. Projects that would be consistent with adopted land use designations would not conflict with the Attainment Plan or RAQS. Projects that would not be consistent with the land uses may be inconsistent with the Attainment Plan or RAQS and warrant further analysis to determine consistency. If it can be demonstrated that changes in land uses would generate fewer air emissions than land uses that are consistent with adopted land use designations, the changes would not conflict with the Attainment Plan or RAQS.

The project would result in a comprehensive update to the existing TCSP involving expanding the TCSP area by 42 acres, updating the boundaries of the TCSP districts to create five neighborhoods within the TCSP, and identifying potential future residential and non-residential development potential within the TCSP area. Although development regulations and design criteria in the proposed TCSP would replace the current TCSP regulations, development densities and intensities currently allowed throughout the TCSP area would not be increased by the project. As a result, the project would not increase the amount of vehicle traffic expected to be generated in the City. Similarly, the project would not result in an increase in the average vehicle miles traveled (VMT) per capita. As buildout of the project would not result in an increase in anticipated development or traffic generation over what would occur under buildout of the adopted zoning and land use designations, the project would not result in an increase in emissions that are not already accounted for in the Attainment Plan or RAQS. Therefore, buildout of the TCSP would not exceed the assumptions used to develop the Attainment Plan or RAQS, and impacts would be less than significant.

AEN

The TCSP would involve updated development standards and land use allowances with the AEN. However, because there is no change to allowed densities and intensities compared to existing zoning, buildout of the project would not result in traffic generation over what would occur under buildout of the adopted zoning and land use designations. Therefore, the project would not result in an increase in emissions that are not already accounted for in the Attainment Plan or RAQS. Therefore, buildout of the AEN would not exceed the assumptions used to develop the Attainment Plan or RAQS, resulting in a less than significant impact.

Housing Element Sites

The project assumes the development of Housing Element sites 16A, 16B, 20A, and 20B consistent with the densities and intensities allowed by existing zoning, the 2021-2029 Housing Element, and state density bonus law. When compared to the existing zoning and land use designations, the project would not increase the development potential allowed at the four Housing Element sites, which would also not increase the projected amount of vehicle traffic generated in the City. The project would not increase the amount of projected traffic in the City and would not result in an increase in the average VMT per capita. As buildout of the project would not result in an increase in development or traffic generation over what would occur under buildout of the adopted zoning and land use designations, the project would not result in an increase in emissions that are not already accounted for in the Attainment Plan or RAQS.

Future development within Housing Element sites 16A, 16B, 20A, and 20B would not result in an increase in development or an increase in traffic generation over what would occur under buildout of the adopted zoning and land use designations and would therefore not result in an increase in emissions. Therefore, buildout of Housing Element sites 16A, 16B, 20A, and 20B would not exceed the assumptions used to develop the Attainment Plan or RAQS, resulting in a less than significant impact.

2. Cumulative Net Increases of Criteria Pollutants

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

Finding: Less than significant. (Draft PEIR, pp. 4.3-15 and 4.3-19)

Explanation: **Housing Element Sites**

Construction

The Housing Element sites' temporary construction emissions were estimated using the California Emissions Estimator Model (CalEEMod) as described in Section 4.3.4.1. The project's temporary construction-related criteria pollutant and precursor emissions would be below the SDAPCD's emission thresholds, including for those pollutants for which the San Diego Air Basin (SDAB) is non-attainment (volatile organic compounds [VOC], nitrogen oxides [NO_X], particulate matter [PM_{10} and $PM_{2.5}$]). Therefore, the project's construction activities would not result in a cumulatively considerable net increase of pollutant criteria for which the project region is non-attainment under an applicable federal or state ambient air quality standards (AAQS). Construction-related impacts would be less than significant for the Housing Element sites when considered together and, therefore, also less than significant for each of the Housing Element sites.

Operation

The long-term maximum daily operational emissions generated by the Housing Element sites were estimated using CalEEMod as described in Section 4.3.4.2. The long-term emissions of criteria pollutants and precursors generated by the Housing Element sites would not exceed the SDAPCD daily screening thresholds, including for those pollutants for which the SDAB is non-attainment (VOC, NO_X, PM_{10}, $PM_{2.5}$). Therefore, the Housing Element sites' operational activities would not 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 AAQS. Therefore, operational impacts would also be less than significant for each of the Housing Element sites.

3. Sensitive Receptors

Threshold: Would the project expose sensitive receptors to substantial pollutant concentrations?

Finding: Less than significant. (Draft PEIR, pp.4.3-19 through 4.3-22)

Explanation: **TCSP Area, AEN and Housing Element Sites**

Localized Carbon Monoxide (CO) Hotspots

CO concentration is a direct function of motor vehicle activity (e.g., idling time and traffic flow conditions) particularly during peak commute hours and meteorological conditions. Under specific meteorological conditions (e.g., stable conditions that result in poor dispersion), CO concentrations may reach unhealthy levels with respect to local sensitive land uses such as residential areas, schools, and hospitals.

A CO hotspot is an area of localized CO pollution caused by severe vehicle congestion on major roadways, typically near intersections. If a project increases average delay at signalized intersections operating at level of service (LOS) E or F or causes an intersection that would operate at LOS D or better without the project to operate at LOS E or F with the project, a quantitative screening is recommended.

The project includes several transportation projects including adding new multi-use pathways and bike routes to existing roadways as well as identifying roadway connections throughout the TCSP area and AEN. The TCSP identifies improvements along portions of existing Cuyamaca Street and Riverview Parkway, and identifies new roadway connections including Riverview Parkway, Cottonwood Avenue, Main Street, and Walker Trails Drive. The roadway improvements on Cuyamaca Street and Riverview Parkway would contribute to the multimodal transportation network by providing new bicycle and pedestrian facilities on those roadways, which would promote non-auto use. Additionally, the proposed roadway connections along Riverview Parkway, Cottonwood Avenue, Main Street, and Walker Trails Drive would provide direct connections through the TCSP area and AEN, as well as onto major arterial roadways and would improve traffic congestion in the area. The transportation projects identified in the TCSP meet the City's VMT screening criteria of "closing gaps in the transportation network" and/or "adding new or enhanced bicycle or pedestrian facilities on existing streets" and are presumed not to increase vehicle travel or intersection delay. Therefore, air quality impacts related to the exposure of sensitive receptors to substantial CO concentrations due to project traffic would be less than significant for the TCSP, AEN and Housing Element sites.

Exposure to Toxic Air Contaminants (TACs)

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the state as TACs. State law has established the framework for California's TAC identification and control program, which is generally more stringent than the federal program. The state has formally identified more than 200 substances as TACs and is adopting appropriate control measures for their sources. The greatest potential for TAC emissions during construction would be emissions of diesel particulate matter (DPM) from heavy equipment operations and heavy-duty trucks. The following measures are required by state law to reduce DPM emissions:

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-use Off-road Diesel Vehicles (13 CCR 2449), the purpose of which is to reduce DPM and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.

- All commercial diesel vehicles are subject to Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. SDAPCD Rule 1200 establishes acceptable risk levels and emission control requirements for new and modified facilities that may emit additional TACs. Under Rule 1200, permits to operate may not be issued when emissions of TACs result in an incremental cancer risk greater than 1 in 1 million without application of Toxics Best Available Control Technologies (T-BACT), or an incremental cancer risk greater than 10 in 1 million with application of T-BACT. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will develop cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk methodology.

Generation of DPM from construction projects typically occurs in a localized area (e.g., near locations with multiple pieces of heavy construction equipment working in close proximity) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction, the construction-related

emissions to which nearby receptors are exposed to would also vary throughout the construction period. Concentrations of DPM emissions are typically reduced by 70 percent at approximately 500 feet (CARB 2005).

The dose of TACs to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a source of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from OEHHA) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities.

Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). Moreover, as shown in Table 4.3-7, maximum daily particulate matter (i.e., PM_{10} or $PM_{2.5}$) emissions generated by construction equipment operation and haul-truck trips during construction (exhaust particulate matter, or DPM), combined with fugitive dust generated by equipment operation and vehicle travel, would be well below the SDAPCD screening-level thresholds. Considering this information, and the fact that any concentrated use of heavy construction equipment would occur at various locations throughout the project site only for short durations, construction of the project would not expose sensitive receptors to substantial DPM concentrations, and the impact would be less than significant.

Additionally, CARB has published the *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB 2005), which identifies certain types of facilities or sources that may emit substantial quantities of TACs and therefore could conflict with sensitive land uses, such as “schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities.” The *Air Quality and Land Use Handbook: A Community Health Perspective* is a guide for siting new sensitive land uses. The enumerated facilities or sources include the following:

- High-traffic freeways and roads,
- Distribution centers,
- Rail yards,
- Ports,
- Refineries,
- Chrome plating facilities,
- Dry cleaners, and
- Large gas dispensing facilities.

CARB recommends that sensitive receptors not be located downwind or in proximity to such sources to avoid potential health hazards.

The project would not include any of the previously listed land uses, so it would not expose visitors, residents, or employees of the project to TAC emissions from these sources. Impacts would be less than significant for the TCSP, AEN, and Housing Element sites.

4. Odors

Threshold: Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?

Finding: Less than significant. (Draft PEIR, pp.4.3-22 through 4.3-23)

Explanation: **TCSP Area, AEN and Housing Element Sites**

In the context of land use planning, one of the most important factors influencing the potential for an odor impact to occur is the distance between the odor source and receptors. The City considers prudent land use planning as the key mechanism to avoid odor impacts. The greater the distance between an odor source and receptor, the less concentrated the odor emission would be when it reaches the receptor. Odors can be generated from a variety of source types including both construction and operational activities. Although less common, construction activities that include the operation of a substantial number of diesel-fueled construction equipment and heavy-duty trucks can generate odors from diesel exhaust emissions. A project's operations, depending on the project type, can generate a large range of odors that can be considered offensive to receptors. Examples of common land use types that typically generate significant odor impacts include, but are not limited to the following:

- Wastewater treatment plants
- Sanitary landfills
- Composting/green waste facilities
- Recycling facilities
- Petroleum refineries
- Chemical manufacturing plants
- Painting/Coating operations
- Rendering plants
- Food packaging plants

When land uses such as these or other odor-generating land uses are sited proximate to sensitive receptors, odor impacts may occur and further analysis of the nature of the odor source, the prevailing wind patterns, number of potentially effected receivers and other considerations would be warranted.

Existing sources of odors in the City include the Sycamore Landfill and a water reclamation plant. However, these uses are located one mile or more from the TCSP area and would not result in odors affecting a substantial number of people.

Emissions from construction equipment, such as diesel exhaust, and VOCs from architectural coatings and paving activities may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. By the time such emissions reach a receptor (e.g., people in residential units, day care centers, schools, nursing homes), they would be diluted to well below any level of air quality concern. Therefore, construction would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

Once operational, future development implemented under the project would include residential and associated commercial uses that are generally not a source of objectionable odors. Therefore, project operation would not result in odors affecting a substantial number of people, and impacts would be less than significant for the TCSP area, AEN, and Housing Element sites.

D. BIOLOGICAL RESOURCES

1. Wetlands

Threshold: Would the project have a substantial adverse effect on wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Finding: Less than significant. (Draft PEIR, p. 4.4-35)

Explanation: **Housing Element Sites 16B, 20A, and 20B**

No impact to wetlands is anticipated to occur in Housing Element sites 16B, 20A, and 20B. The Housing Element sites 16B, 20A, and 20B would result in impacts to disturbed habitat and developed land, which are not considered sensitive natural communities. Impacts to non-sensitive vegetation communities are not considered significant and, therefore, do not require mitigation.

2. Wildlife Corridors

Threshold: 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?

Finding: Less than significant. (Draft PEIR, p. 4.4-36)

Explanation: **TCSP Area and AEN**

The TCSP and AEN contain areas associated with the San Diego River and its tributaries. While the City of Santee Draft Subarea Plan identifies the San Diego River as a regionally significant wildlife movement corridor, the City of Santee Draft Subarea Plan shows the TCSP area and AEN development areas as being located outside of the Preserve. Retention of the river corridor as Open Space consistent with the TCSP and the implementation of Objective Design Standards related to Bird Friendly Design would ensure no impact to wildlife corridors would occur associated with the TCSP or AEN.

Housing Element Sites

Sites 16A, 16B, 20A, and 20B are primarily surrounded by developed land. Although sites 16A and 16B are bounded, in part, by undeveloped land, they do not meet the criteria for a wildlife movement corridor as they are restricted by roads and other

development. Additionally, they are not identified as a wildlife movement corridor in the City of Santee Draft Subarea Plan. No impact to wildlife corridors would occur within the Housing Element sites.

E. ENERGY

1. Energy Consumption

Threshold: Would the Project result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Finding: Less than significant. (Draft PEIR, pp. 4.6-10 through 4.6-13)

Explanation: **TCSP Area and AEN**

Construction

Construction grading and construction activities consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. At the program-level, it is too speculative to quantify total construction-related energy consumption of future development in the TCSP area and AEN, either in total or by fuel type. Energy used during future construction of the project areas is not considered significant given typical energy use associated with the type of development proposed and short-term nature of the energy consumption. There are no conditions in the project areas that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Consistent with state requirements, all construction equipment would meet CARB Tier 3 In-Use Off-Road Diesel Engine Standards. Engines are required to meet certain emission standards, and groups of standards are referred to as Tiers. A Tier 0 engine is unregulated with no emission controls, and each progression of standard level (i.e., Tier 1, Tier 2, Tier 3, etc.) generate lower emissions, use less energy, and are more advanced technologically than the previous tier. CARB's Tier 3 In-Use Off-Road Diesel Engine Standards requires that construction equipment fleets become cleaner and use less energy over time. Therefore, the project would not result in a wasteful and inefficient use of energy resources during the construction of future development, and impacts would be less than significant.

Operation

Long-term operational energy use associated with buildout of the TCSP area and AEN includes fuel consumption of vehicles; electricity and natural gas consumption by residents and commercial operations, and energy consumption related to obtaining water. Anticipated housing will be multi-family housing which is a more efficient way to provide housing than lower density single-family development. Although the project would provide capacity for future housing and non-residential development that could increase energy use, energy demand of future development within urbanized infill areas would be consistent with energy demand for development within other cities in the region and would not be associated with inefficient or wasteful energy use. Implementation of the project would not result in any unusual characteristics that would result in excessive long-term operational building energy demand. Future development associated with implementation of development in the TCSP area and AEN would be subject to compliance with the California Building Code (CBC) Title 24 which aims to reduce excessive and inefficient energy use. The CBC is regularly updated and includes higher energy-efficiency standards in comparison to other states. Individual development projects in the City would be required to comply with applicable federal, state, and local energy and building regulations, including the requirements of the Sustainable Santee Plan.

Housing Element Sites

Construction

Energy consumed for construction of the Housing Element sites would primarily consist of fuels in the form of diesel and gasoline. Fuel consumption would result from: the use of on-road trucks for the transportation of construction materials and water; construction worker vehicles traveling to and from the project site; and from the use of off-road construction equipment. A complete description of the project construction equipment use and vehicle trips is included in Appendix G.

While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. The petroleum consumed during project construction would be typical of similar residential projects and would not require the use of new petroleum resources beyond those typically consumed in California annually for construction activities. The proposed project would be required to comply with CARB's Airborne Toxics Control Measure, which restricts heavy-duty diesel

vehicle idling time to no more than five minutes. Furthermore, the project's construction practices would be typical, and would not require specialized construction equipment or otherwise present unusual circumstances in which substantial amounts of fuel would be required. Based on these considerations, construction of the Housing Element sites would not result in wasteful, inefficient, or unnecessary consumption of energy resources and the impact would be less than significant.

Operation

During long-term operation of the Housing Element sites, energy would be consumed in the form of diesel and gasoline used by vehicles traveling to and from the project site; electricity required to source and treat water used by the project; and electricity and natural gas used directly by the project. The project would result in a net increase in annual energy consumption of approximately 110,038 million British thermal units. While the proposed project would result in the consumption of energy, the increase would be consistent overall with the energy projections for the state and the region to meet the demands of anticipated future residential growth in the state and region. Implementation of the project would not require the construction of new regional facilities and sources of energy.

Electricity and Natural Gas

The project does not involve any unusual characteristics that would result in excessive long-term operational demand for electricity or natural gas. The applicable state plans that address renewable energy and energy efficiency are the California Green Building Standards Code (CALGreen), the California Energy Code, and Renewable Portfolio Standard (RPS), and the applicable local plan is the General Plan and Sustainable Santee Plan. All future development projects would be required to meet the mandatory energy requirements of 2022 CALGreen and the 2022 California Energy Code, at a minimum. The project would not conflict with or obstruct implementation of CALGreen and the California Energy Code, or with San Diego Gas & Electric's (SDG&E's) implementation of RPS. Project adherence with state and federal regulations and the Sustainable Santee Plan goals will guide reductions in the City's collective long-term operational energy use. Impacts relative to the inefficient, wasteful, or unnecessary consumption of energy would be less than significant.

Transportation

Buildout of the Housing Element sites would consume energy associated with transportation uses. Trips by individuals traveling to and from the project area would largely rely on passenger vehicles or public transit. Passenger vehicles would be powered by gasoline, diesel, and electricity. Public transit would be powered by diesel or natural gas, and could potentially be fueled by electricity, as is the case with the Copper Line Trolley that terminates within one-half mile of sites 16A and 16B. As discussed in Section 4.16, the project would result in a less than significant transportation impact. The TCSP prioritizes pedestrian-oriented development through the provisions of a mixed-use design, multi-use pathways, trail connectivity, bike lanes, and access to public transit. These measures would reduce reliance on passenger vehicles for travel within the Housing Element sites, further minimizing VMT and energy consumption. Impacts would be less than significant.

2. State or Local Plans

Threshold: Would the Project conflict with or obstruct a state of local plan for renewable energy or energy efficiency?

Finding: Less than significant. (Draft PEIR, pp. 4.6-13)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

The proposed TCSP area, AEN, and Housing Element sites would comply with applicable energy standards and regulations during construction and would be built and operated in accordance with existing, applicable building regulations at the time of construction, as mandated by Title 24 energy efficiency standards. The project would not conflict with or obstruct implementation of CALGreen or with SDG&E's implementation of RPS. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

F. GEOLOGY AND SOILS

1. Seismic Hazards and Unstable Geology

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a

known fault (refer to Division of Mines and Geology Special Publication 42); (ii) strong seismic ground shaking? (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?

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?

Finding: Less than significant. (Draft PEIR, pp. 4.7-10 through 4.7-12)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

Fault Rupture

Geologic conditions are similar across the TCSP area, AEN, and Housing Element sites. As a result, this analysis addresses the three project elements together. The City is not located within an earthquake fault zone as delineated on the most recent Alquist-Priolo Fault Zoning Map, and no active or potentially active faults are known to occur within or adjacent to the City; however, like all other areas in California, the City is subject to periodic seismic shaking due to earthquakes along remote or regional active faults. Thus, all development within the TCSP area, AEN, and Housing Element sites would be susceptible to damage due to the seismically active nature of the region. However, future development, whether discretionary or by-right, would be required to comply with the City's General Plan Safety Element policies identified in Section 4.7.2.3.

The above policies are implemented through Section 11.40.130 of the SMC which specifies that a preliminary soils engineering report must be submitted with the application for a grading permit. A preliminary geological investigation and report is required for all land development projects designated as Group II or III as defined in the Safety Element. Additionally, as shown in Figure 4.7-3, the project area is in an area with liquefaction potential. As a result, a geotechnical investigation, geologic investigation, and seismic hazard study would be required for future projects in the TCSP area, AEN, and Housing Element sites. In addition, conformance to building construction standards for seismic safety within the CBC would ensure that new structures would be able to withstand seismic events within the City. Specifically, the CBC provides minimum standards relating to building design and construction to protect structural damage and hazards that could occur from seismic shaking. Therefore, adherence to General Plan Safety Element policies, the SMC, and the CBC would ensure that future development within the

TCSP area, AEN, and Housing Element sites would not cause substantial adverse effects associated with fault rupture, and impacts would be less than significant.

Ground Shaking

As described in Section 4.7.4.1 above, no active or potentially active faults are known to occur within or adjacent to the City, however, like all other areas in California, the City is subject to periodic seismic shaking due to the earthquakes along remote or regional active faults. Thus, all development within the TCSP area, AEN, and Housing Element sites would be susceptible to damage due to the seismically active nature of the region. The project would increase the allowable number of people and structures that could be exposed to ground shaking during a seismic event. However, future development, whether discretionary or by right, would be required to comply with General Plan Safety Element policies and the SMC requirements described in Section 4.7.4.1 above. In addition, conformance to building construction standards for seismic safety within the CBC would ensure that new structures would be able to withstand seismic events within the TCSP area, AEN, and Housing Element sites. Therefore, adherence to General Plan Safety Element policies, the SMC, and the CBC would ensure that future development within the TCSP area, AEN, and Housing Element sites would not cause substantial adverse effects associated with ground shaking, and impacts would be less than significant.

Liquefaction and Landslide

Areas having the potential for earthquake-induced landslides generally occur within areas of previous landslide movement, or where local topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacement. Debris flows are caused by high rainfall, steep slopes, loss of vegetation cover, and thick overburden. Within the City, the soil deposits that may be susceptible to liquefaction are the alluvial soils found in the San Diego River and its deeper tributary channels. The general extent of the areas identified for liquefaction potential are shown on Figure 4.7-3. Because of their proximity to the San Diego River, the TCSP area, AEN, and Housing Element sites are all within an area identified as having liquefaction potential.

Landslides, or landslide prone material, exist predominantly in the northern portion of the City, generally below the 600-foot elevation. Some of this area has been previously altered to remediate the potential effects of slope instability. Compressible and expansive soils

(primarily in Friars Formation slopes) and shallow groundwater are in the Sycamore Canyon Creek drainage (City 2020a). Areas of potential landslide are shown in Figure 4.7-3. The TCSP, AEN, and Housing Element sites are in the southern portion of the City and not located within a landslide susceptible area.

All future development, whether discretionary or by-right, would be required to comply with the General Plan Safety Element policies and the SMC requirements described in Section 4.5.5.1.a above. In addition, conformance to building construction standards for seismic safety within the CBC would ensure that new structures would be able to withstand seismic events within the City. Therefore, adherence to Safety Element policies, the SMC, and the CBC would ensure that future development within the TCSP area, AEN, and Housing Element sites would not cause substantial adverse effects associated with liquefaction or landslide, and impacts would be less than significant.

2. Soil Erosion

Threshold: Would the Project result in substantial soil erosion or the loss of topsoil?

Finding: Less than significant. (Draft PEIR, p. 4.7-12)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

Geologic conditions are similar across the TCSP area, AEN, and Housing Element sites. As a result, this analysis addresses the three project elements together. Grading, excavation, demolition, and construction activities associated with the TCSP area, AEN, and Housing Element sites would increase the potential to expose topsoil to erosion. While graded or excavated areas and fill materials would be stabilized through efforts such as compaction and installation of hardscape and landscaping, erosion potential would be higher during construction activities as individual project sites are built out. Erosion and sedimentation would primarily be a concern during construction phases as future developed areas would be stabilized through the installation of hardscape, landscaping, or native revegetation as appropriate. Future development would also incorporate long-term water quality controls pursuant to the most current storm water standards including the National Pollutant Discharge Elimination System (NPDES) Municipal Permit requirements. Measures implemented to avoid or reduce erosion and sedimentation effects are discussed in Section 4.10. Short-term erosion and sedimentation impacts would be addressed through conformance with the NPDES

and associated SMC requirements (Title 9, Chapter 9.06 Stormwater Management and Discharge Control). These regulations require erosion and sedimentation control during construction and implementation of best management practices to avoid erosion and off-site drainage. Therefore, adherence to applicable SMC requirements would ensure that future development would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant for the TCSP, AEN, and Housing Element sites.

3. Expansive Soils

Threshold: Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?

Finding: Less than significant. (Draft PEIR, p. 4.7-13)

Explanation: **TCSP Area**

The TCSP area is underlain by sandy loam south of the San Diego River and riverwash, water, clay, loam, and sandy loam north of the San Diego River. Soils with relatively high fines content (clays dominantly) are generally considered expansive or potentially expansive. Development within these soils could result in a significant impact due to the soil's inability to support the proposed structures, especially during major rain events and/or flash floods. The presence of clay would require future development within the northern section of the TCSP area to adhere to SMC requirements for project-specific geotechnical reports that would ensure site-specific measures are implemented to ensure safe building construction in areas with expansive soils. These reports would provide guidance for the inclusion of proper site planning, design, and construction measures to avoid unfavorable conditions. Adherence to SMC requirements would ensure that future development would not create substantial direct or indirect risks associated with expansive soils, and impacts would be less than significant.

AEN

The AEN is underlain by sandy loam south of the San Diego River and riverwash, water, clay, loam, and sandy loam north of the San Diego River. Adherence to SMC requirements described above would ensure that future development would not create substantial direct or indirect risks associated with expansive soils, and impacts would be less than significant.

Housing Element Sites

The Housing Element sites are underlain by sandy loam and riverwash, which are not generally considered expansive or potentially expansive. Impacts would be less than significant.

4. Septic Tanks or Alternative Wastewater Disposal

Threshold: Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Finding: No impact. (Draft PEIR, p. 4.7-14)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

Due to the urban and built out nature surrounding the TCSP area, AEN, and the Housing Element sites, there is no expectation that septic tanks or alternative wastewater disposal systems would be part of any future development proposal. All sites would be served by Padre Dam Municipal Water District for wastewater service. No impacts would occur.

G. GREENHOUSE GAS EMISSIONS

1. Greenhouse Gas Emissions

Threshold: Would the project result in greenhouse gas (GHG) emissions that may have a significant impact on the environment?

Finding: No impact. (Draft PEIR, p. 4.8-19 through 4.8-24)

Explanation: **TCSP and AEN**

The project would result in a comprehensive update to the existing TCSP involving expanding the TCSP area by 42 acres, updating the boundaries of the TCSP districts to create five neighborhoods within the TCSP, and identifying potential future residential and non-residential development potential within the TCSP area. Future development allowed throughout the TCSP area would not be increased by the project; however, development regulations and criteria in the proposed TCSP would replace the current TCSP. As a result, the project would not increase the amount of vehicle traffic expected to be generated in the City. Similarly, the project would not increase the amount of traffic in the City and would not result in an increase in the average VMT per capita. As buildout of the project would not result in an increase in anticipated development or traffic

generation over what would occur under buildout of the adopted zoning and land use designations, the project would not result in an increase in emissions that are not already accounted for in the Sustainable Santee Plan.

The Sustainable Santee Plan includes 10 goals across 5 categories. The proposed project consists of a comprehensive update to the TCSP to modify or establish new land use designations, land uses, development standards, and conceptual guidelines that would apply to future development within the TCSP area. The project is not proposing specific development that could be demonstrated as incorporating measures related to building space, energy use, or utilities; however, the project would not inhibit the City from implementing these measures or achieving these goals. The project includes several transportation projects which would be consistent with Goals 6 and 8 within the Transportation category, as detailed in Table 4.8-9, *Project Consistency with Sustainable Santee Plan Measures*.

The transportation projects identified in the TCSP meet the City's VMT Analysis Guidelines screening criteria of "closing gaps in the transportation network" and/or "adding new or enhanced bicycle or pedestrian facilities on existing streets" and are presumed not to increase vehicle travel. The transportation projects identified in the TCSP are intended to increase pedestrian and bicycle safety and connection within the TCSP area to aid in the reduction of VMT and mobile source emissions. The majority of the TCSP area, including the AEN, is located within a designated Transit Priority Area (TPA). By placing these uses within a TPA, the project would implement the Sustainable Santee Plan strategies by focusing projected future growth into mixed-use and multiple-use activity centers that are pedestrian- and bicycle-friendly and linked to transit. Increasing residential and commercial density in transit corridors and within a TPA would support the City in achieving the GHG emissions reduction targets of the Sustainable Santee Plan, and thus, impacts associated with GHG emissions would be less than significant.

2. Policies, Plans, and Regulations Intended to Reduce GHG Emissions

Threshold: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

Finding: Less than significant. (Draft PEIR, pp. 4.8-24 through 4.8-25)

Explanation: **TCSP Area and AEN**

There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020, which the State achieved. SB 32 and AB 1279 require further reductions of 40 percent below 1990 levels by 2030 and 85 percent below 1990 levels by 2045, respectively. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the Low-Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Therefore, the proposed project would not conflict with those plans and regulations.

Future projects within the TCSP area and AEN must also be constructed in accordance with the energy-efficiency standards, water reduction goals, and other standards contained in the applicable Title 24 Part 6 Building Energy Efficiency Standards and Part 11 CALGreen Building Standards. The Sustainable Santee Plan was developed to ensure community-wide GHG emissions in Santee would meet the state's 2030 GHG reduction goal mandated by SB 32, thereby demonstrating progress towards achieving the 2045 reduction goal established by AB 1279. Therefore, because the project would be consistent with the Sustainable Santee Plan, as discussed in Section 4.8.5.1, the project would not conflict with state GHG reduction plans developed to achieve the goals, including the CARB Scoping Plan.

H. HAZARDS AND HAZARDOUS MATERIALS

1. Routine Use, Transport, and Disposal

Threshold: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Finding: Less than significant. (Draft PEIR, pp. 4.9-16 through 4.9-19)

Explanation: **TCSP area, AEN, and Housing Element Sites**

Future grading or construction has the potential to impact directly or indirectly the public or environment through such activities. Figure 4.9-1 identifies GeoTracker cleanup sites throughout the City. As

described in Section 4.9.1.2, none of the existing cleanup sites are located within or adjacent to the TCSP area, AEN, or Housing Element sites; however, future development in these areas may result in the transport of hazardous materials during construction (e.g., asbestos-containing materials [ACMs], lead-based paints [LBPs], and/or contaminated soils). This transport would be limited in duration and would be required to comply with all applicable State and local regulatory measures associated with handling and transport of contaminated or potentially contaminated materials. Additionally, City implementation of General Plan Safety Element Policies (refer to Section 4.9.2.4) supports implementation of Citywide safety measures associated with hazardous materials handling. Future development within the TCSP area, AEN, and Housing Element sites would be required to adhere to extensive regulations related to hazardous materials handling and transport. Additionally, implementation of the City's development review process would ensure site specific consideration and regulation of the potential for storage, handling, and use of hazardous materials.

Future residential development would not involve the ongoing or routine use of substantial quantities of hazardous materials during operations. Only small quantities of hazardous materials associated with household hazards would be anticipated to occur. Mixed-use development and commercial development would likewise be associated with common hazardous materials such as cleaning solvents, fertilizers, pesticides, and other materials used in the regular maintenance and upkeep of the proposed land uses.

Potentially applicable to future development in the TCSP area, AEN, and mixed-use portions of the Housing Element sites, Hazardous Material Business Plans (HMBPs) are required of businesses that handle hazardous substances in amounts greater than or equal to specified thresholds. The purpose of an HMBP is to minimize hazards to human health and the environment from unplanned, accidental releases of hazardous substances into the air, soil, or surface water. An HMBP must include an emergency response program that serves to manage emergencies at the given facility and prepare response personnel for a variety of conditions. HMBPs are submitted to County of San Diego's Department of Environmental Health and Quality (DEHQ) Hazardous Materials Division and are reviewed and updated as necessary every three years, or in the event of an accidental release, change in materials storage location or use, or change in business name, address, or ownership. Additionally, future development associated with the project would have the benefit of City provided household hazardous waste collection programs and

City programs that encourage safe and proper disposal of household hazardous waste consistent with General Plan Policies 3.5 and 3.7.

With proper use and disposal of hazardous materials as required by state, regional, and local regulations, the project would not result in hazardous or unhealthful conditions within or in proximity to the project area. Compliance with all applicable regulations would ensure impacts associated with use, transport and disposal of hazardous materials associated with the TCSP area, AEN and Housing Element sites would be less than significant.

2. Hazards Near Schools

Threshold: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Finding: Less than significant. (Draft PEIR, p. 4.9-16 through 4.9-19)

Explanation: **Housing Element Sites**

There are no schools within 0.25 mile of the Housing Element sites. Therefore, no impacts to hazards within 0.25 mile of a school would occur associated with the Housing Element sites.

3. Hazardous Materials - Sites

Threshold: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Finding: Less than significant impact. (Draft PEIR, p. 4.9-20)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

No areas of the TCSP area, AEN, or Housing Element sites are listed as hazardous materials sites pursuant to Government Code Section 65962.5 (Cortese List). Therefore, it is not expected that grading, excavation, or construction activities would result in the release of hazardous materials associated with contaminated soils or underground tanks. Therefore, the project would not result in conditions leading to any reasonably foreseeable upset or accident involving the release of hazardous materials. No impact would occur.

4. Emergency Response

Threshold: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Finding: Less than significant impact. (Draft PEIR, p. 4.9-24 through 4.9-25)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

Buildout of the TCSP area, AEN, and Housing Element sites would create opportunities for residential and non-residential development in the TCSP area, resulting in greater population concentrations within neighborhoods. This could result in an increase in demand for emergency evacuation.

While the project does propose changes to the City's existing circulation network, such as plans for roadways and updated roadway facility guidelines and pedestrian, bicycle, transit, auto, and parking standards, these changes would facilitate improved connectivity throughout the TCSP area. No land uses are proposed that would impair implementation of or physically interfere with the City's emergency response plan, evacuation routes, or conflict with any of the Multi-Jurisdictional Hazard Mitigation Plan's specific hazard mitigation goals, objectives, and related potential actions. Specifically, the Multi-Jurisdictional Hazard Mitigation Plan requires each jurisdiction to develop and publish evacuation procedures that are published and available to the public. The City provides educational materials related to emergency preparedness. All residents of the City have access to the materials and the materials are included in all Community Emergency response Team training and information. Furthermore, applications for all future projects within the TCSP area, AEN, and Housing Element sites would be reviewed and approved by the Santee Fire Department prior to issuance of building permit. Therefore, buildout of the proposed project would not conflict with emergency response, and impacts would be less than significant.

5. Wildland Fires

Threshold: Would the Project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Finding: Less than significant impact. (Draft PEIR, p. 4.9-25)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

The TCSP area, AEN, and Housing Element sites are not located within the CAL FIRE Very High Fire Hazard Severity Zone (VHFHSZ), as shown on Figure 4.9-3. However, as shown in Figure 4.9-3, the majority of the TCSP area is in a Wildland-Urban Interface (WUI) zone, which includes areas close to vacant sites with vegetation susceptible to fire. The City's General Plan policies 4.2 through 4.13 provide guidance for the minimization of fire hazards including ensuring adequate response times, setting standards for emergency access, structural standards, and other planning design measures required to be considered in all new development. Additionally, future discretionary projects would require review by the Building Official/Fire Marshal. A less than significant impact would occur.

I. HYDROLOGY AND WATER QUALITY

1. Water Quality

Threshold: Would the Project violate any water quality standards or waste discharge requirements?

Would the project conflict with or obstruct implementation of a water quality control plan or substantial groundwater management plan?

Finding: Less than significant. (Draft PEIR, p. 4.10-17 through 4.10-18)

Explanation: **TCSP Area and AEN**

While specific projects within the TCSP area are not currently known, the TCSP would allow for new development and associated infrastructure to occur within the TCSP area, including the AEN. Future development of the TCSP area and AEN would have the potential to result in water quality impacts both during construction and from postconstruction operation. During construction, development would entail grading and other earthmoving activities. Exposed soils could be eroded and deposited into the surrounding water bodies, increasing the amount of sediment and turbidity in these water bodies. Additionally, chemicals or fuels could accidentally spill and be released into receiving waters, which could adversely alter water chemistry.

As part of long-term operation of projects, water quality impacts could result from use of common household materials used in landscaping and residential uses that may result in the generation of runoff pollutants such as sediments, oils and grease, heavy metals,

pesticides, fertilizers, trash and debris, oxygen-demanding substances, and bacteria and viruses, which are typical for residential and mixed uses. In addition, new development would result in greater vehicular use of roadways, which could potentially increase contaminants that would be carried in runoff and discharged into receiving waters. Therefore, nonpoint source pollutants would be the primary contributors to potential water quality degradation as a result of project buildout. Nonpoint source pollutants could be washed by rainwater from rooftops, landscaped areas, parking areas, and other impervious surfaces into the on-site drainage system.

In addition, the TCSP area is already highly impervious and was developed largely at a time prior to the regulation of stormwater quality. New development within the TCSP area would have to come into conformance with current water quality regulatory standards. Thus, overall water quality in the post-buildout condition would be similar (if not improved) to existing conditions, except at undeveloped sites where an increase in impervious surfaces would result, thereby potentially increasing stormwater pollutants into the drainage systems.

Future development, whether discretionary or by right, would be required to adhere to all applicable water quality standards as provided in various water quality regulations and plans including all pertinent requirements of the City's Jurisdictional Runoff Management Plan (JRMP) (including the Water Quality Improvement Plan and Municipal Separate Storm Sewer Systems [MS4] Permit), best management practice (BMP) Design Manual, NPDES General Construction Permit, as well as all regulations related to water quality. The General Construction Permit requires preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which must include erosion and sediment control BMPs that would meet or exceed measures required by the NPDES General Permit, as well as BMPs that control hydrocarbons, trash and debris, and other potential construction-related pollutants. Future projects within the TCSP area would comply with the City's General Plan policies requiring the incorporation of construction BMPs for the protection of water quality. Additionally, new development would be required to adhere to the City's Stormwater Ordinance applying source control and site design BMPs as project design features to reduce the discharge of pollutants into the stormwater conveyance system. Therefore, through regulatory compliance impacts related to water quality standards and waste discharge requirements would be less than significant. Likewise, future development within the TCSP area

would not conflict with or obstruct implementation of a water quality control plan.

Housing Element Sites

Housing Element sites 16A, 16B, 20A, and 20B are totally or mostly vacant. As a result, implementation of the proposed project would increase impervious surfaces, thereby potentially increasing the amount of stormwater pollutants and waste discharge into the drainage systems. However, impacts to water quality standards and waste discharge requirements would be less than significant through regulatory compliance. Likewise, future development within the Housing Element sites would not conflict with or obstruct implementation of a water quality control plan. Impacts associated with the Housing Element sites would be less than significant.

2. Groundwater

Threshold: Would the Project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Finding: Less than significant. (Draft PEIR, p. 4.8-18 through 4.8-19)

Explanation: **TCSP Area and AEN**

The TCSP would allow for new development and associated infrastructure projects to occur within the TCSP area, including the AEN. Both redevelopment and new development on vacant sites would be required to comply with applicable stormwater management requirements which focus on retention and infiltration of waters on-site, which would provide for ongoing groundwater recharge. Temporary dewatering could be required in areas with high ground water levels. Such dewatering requires a dewatering permit and is typically designed to only move water away from such sites temporarily through sloping or pumping the water to other areas during construction of deep foundation work, thereby not having long term effects on groundwater. Although permanent dewatering systems could also occur if uses such as underground parking is required, these dewatering systems would be required to comply with typical geotechnical and engineering standards addressing geotechnical safety and water quality. Redevelopment of sites in the TCSP area, including the AEN, would not result in a substantial change in impervious surfaces as these sites already support some level of development. Additionally, future projects would be required

to comply with the City's General Plan policies and regulations that prioritize infiltration and treatment of stormwater and generally require increased on-site infiltration and higher standards of water quality protection compared to water quality standards that would have been implemented on existing developed sites. Therefore, although development/redevelopment within the TCSP area, including the AEN, would increase impervious surfaces, prioritization of on-site infiltration would ensure groundwater recharge, and impacts to groundwater quality would be less than significant.

While the City does not have a groundwater management plan as one is not required for the City's groundwater basins under the Sustainable Groundwater Management Act, the TCSP area would not obstruct implementation of ongoing sustainable use of the City's groundwater resources as the City is not dependent on groundwater (Regional Water Quality Control Board [RWQCB] 2021). Therefore, future development of the TCSP area, including the AEN, would not substantially interfere with groundwater recharge such that the project would impede sustainable groundwater management of the basin.

Housing Element Sites

Housing Element sites 16A, 16B, 20A, and 20B are totally or mostly vacant. As a result, implementation of the proposed project would increase impervious surfaces; however, compliance with General Plan policies and regulations would ensure that impacts to ground water quality associated with the Housing Element sites would be less than significant.

3. Drainage Patterns/Stormwater Runoff

Threshold: 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 through the addition of impervious surfaces in a manner which would: (i) result in a substantial erosion or siltation on or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; (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 (iv) impede or redirect flood flows?

Finding: Less than significant. (Draft PEIR, pp. 4.10-19 through 4.10-21)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

The TCSP area, AEN and Housing Element sites are located within urbanized areas throughout the City with existing stormwater facilities. Buildout of the proposed project would not result in substantial changes to the overall drainage patterns within the City because stormwater runoff from the project areas would still be collected within the existing stormwater conveyance system, and runoff would ultimately be discharged into the Forrester and Sycamore Canyon creeks, which are tributary to the San Diego River and then the Pacific Ocean. Additionally, as existing developed sites are redeveloped, they would be required to demonstrate compliance with the most current water quality standards that required increasingly stringent measures to detain and treat runoff to improve water quality. Impacts related to erosion/siltation, increased rate of stormwater runoff, drainage patterns, and impeding or redirecting flood flows are evaluated below.

a. Erosion or Siltation

Development within the TCSP area, including the AEN and Housing Element sites, has the potential to alter drainage patterns by increasing impervious surfaces (additional structures, walkways, and parking areas), which have a lower absorption rate for rainfall than that of vacant natural lands. All future development, whether discretionary or by right, would be required to conform with the City's General Plan policies and new regulatory standards. Specifically, adherence to the City's Stormwater and Grading Ordinances include requirements which focus on retention and infiltration of waters on-site and avoidance of changes to drainage velocities during both construction and post-construction/operational phases of development. These regulations would ensure avoidance of increases in erosion and siltation.

With respect to construction-related measures, consistent with the SMC Chapters 9.06 and 11.40, all future development proposing one acre or greater of grading would be required to prepare a construction SWPPP describing specific construction BMPs that address pollutant source reduction and provide erosion control measures necessary to reduce potential pollutant sources. Additionally, post construction, individual projects would be required to ensure the maintenance of post-construction BMPs designed to retain volume and velocity of stormwater. The ongoing erosion control measures would ensure that surface water runoff flows leaving future development sites during both construction and operation of future projects would not carry substantial amounts of sediment to downstream waters. Therefore,

through regulatory compliance, impacts related to erosion and siltation associated with development of the proposed project would be less than significant.

b. Increase Surface Runoff/Impede or Redirect Flood Flows

Future development could result in increased surface runoff due to the construction of additional structures, walkways, and parking areas within the TCSP area, AEN, and Housing Element sites. Consistent with the City's General Plan Conservation Element policies and SMC (Chapters 9.06 and 11.40), all future development, whether discretionary or by right, would be required to ensure the maintenance of stormwater flows to ensure the project would not result in increased surface runoff or redirect existing flood flows. Implementation of applicable stormwater BMPs and erosion control measures would be required to retain flows on-site and minimize the velocity of stormwater runoff. Such BMPs could include on-site drainage swales, bioretention features, use of permeable pavers in parking areas and streets, or infiltration basins which also serve as a means for pollutant removal. Additionally, applicable projects would be required to include low impact development (LID) BMPs as discussed in the JRMP to treat potentially polluted runoff prior to entering the public storm drain system. Project-specific studies would be required to ensure that volume-based treatment LID BMPs are properly sized to infiltrate, filter, or treat the remaining portion of the runoff volume that was not retained or treated by other BMPs to maintain flows and ensure future projects would not redirect flood flows or alter the course of a stream or river. Through these project-specific measures, impacts related to increased or redirected surface runoff associated with development of the proposed project would be less than significant.

c. Exceed Capacity of Stormwater System

Future development of the TCSP area, AEN, and Housing Element sites would contribute runoff to the existing stormwater drainage system. However, future development, whether discretionary or by right, would be required to adhere to state and local regulation and policies including preparation of project specific Stormwater Quality Management Plans, BMP Plan Sheets, drainage plans, and pollution control plans. Specifically, SMC Section 9.06.250(B) requires priority development projects to include hydromodification management BMPs that are sized and designed to ensure that post-project runoff conditions (flow rates and durations) would not exceed the pre-development runoff conditions by more than 10 percent. This, along with City wide storm water improvements described in the EIR Project Description assists in ensuring that stormwater flows would not

overwhelm the City's stormwater system. Additionally, the Development Impact Fee (DIF) and Dedication Ordinance requires new development to provide funds for the installation of needed drainage improvements. Through regulatory compliance and payment of the DIF, impacts related to exceeding the capacity of the stormwater system associated with development of the proposed project would be less than significant.

4. Flood Hazard/Tsunami Inundation

Threshold: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Finding: Less than significant. (Draft PEIR, p. 4.10-21 through 4.10-23)

Explanation: Flood Hazards

TCSP Area and AEN

As shown in Figure 4.10-2, the TCSP area encompasses land north and south of the San Diego River and its associated flood hazard zones. Riverine flooding impacts could occur from increases in the amount of runoff delivered to the creeks or river, causing an increase to the total flow and pollutant release in the creeks or river. In general, the potential for riverine flooding impacts is addressed through management of local surface runoff. Additionally, the potential for flooding impacts from direct alterations to the creeks or river is managed through the adoption of development regulations for Special Flood Hazard Areas (SFHAs) or areas mapped as 100-year flood hazard areas on federal Flood Insurance Rate Maps, where the National Flood Insurance Program (NFIP's) management regulations must be enforced. These regulations address placement of fill, housing, and structures in areas mapped as SFHAs. The City's General Plan Safety Element specifically prohibits development within a mapped 100-year flood zone (Policy 1.8). The TCSP area is within the dam inundation area for the San Vicente and El Capitan Dams and partially within the dam inundation area for the Chet Harritt Dam. The California Department of Water Resources, Division of Dam Safety, reviews the safety of dams annually. The TCSP area is at least four miles away from all nearby dams and development within the TCSP area would not increase the risk of a dam failure Buildout of future identified project areas would be required to adhere to all state and local development regulations including the City's General Plan and SMC (Chapter 11.36), which establishes Flood Damage Prevention standards and development prohibitions.

Development within the TCSP area would not be expected to exacerbate flooding issues, considering the emphasis on stormwater retention and on-site infiltration. Overall, through regulatory compliance, impacts related to flood hazards associated with development of the TCSP area would be less than significant.

Housing Element Sites

Site 16A

Site 16A is adjacent to the San Diego River and the northern portion of the site is partially within the 100-year inundation zone. Development of Site 16A would be required to adhere to all state and local development regulations including the City's General Plan and SMC, which could require development in this area to be elevated above the floodplain and/or process a letter of map revision through the Federal Emergency Management Agency (FEMA) showing the proposed project would meet NFIP standards. Development within Site 16A would not be expected to exacerbate flooding issues, considering the emphasis on stormwater retention and on-site filtration. Overall, through regulatory compliance, impacts related to flood hazards associated with development of Site 16A would be less than significant.

Site 16B, 20A, and 20B

Site 16B, 20A, and 20B are not within a flood hazard zone. Impacts would be less than significant.

Tsunami

TCSP Area, AEN, Housing Element Sites

The TCSP area, AEN, and Housing Element sites are not in a tsunami zone and, therefore, the project would not be affected in the event of a tsunami. Thus, buildout of the proposed project would not result in impacts associated with a tsunami inundation.

J. LAND USE AND PLANNING

1. Physically Divide an Established Community

Threshold: Would the Project physically divide an established community?

Finding: Less than significant. (Draft PEIR, p. 4.11-7 through 4.11-8)

Explanation: **TCSP Area and AEN**

The TCSP area is in an urbanized part of the City and the proposed TCSP would include updated development standards that would guide planned development throughout the TCSP area and AEN. The proposed TCSP identifies roadway improvements including bike lanes and multi-use pathways as well as new roadway connections to provide direct connections through the TCSP area and AEN. These improvements are not of a size or scale that would divide an established community. Future development in the TCSP area and AEN would be integrated into the existing area and would be developed pursuant to the TCSP and the City's General Plan and SMC. Development pursuant to the TCSP would be subject to objective design standards and would not physically divide an established community. Further, the project proposes a River Bridge over the San Diego River that would improve connectivity in the TCSP area and AEN as the San Diego River currently separates much of the TCSP area from north to south. Significant impacts related to physically dividing an established community would not occur.

Housing Element Sites

The Housing Element sites are in the southeastern part of the AEN on vacant generally flat sites along existing roadways and near existing developed areas. Development of these Housing Element sites 16A, 16B, 20A, and 20B would occur in areas that have been either developed in the past or have been identified for development. Significant impacts related to dividing an established community would not occur.

K. NOISE

1. Noise Standards

Threshold: Would the Project result in the 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?

Finding: Less than significant. (Draft PEIR, pp. 4.12-13 through 4.12-22)

Explanation: Operational Noise

Traffic Noise

TCSP Area, AEN, and Housing Element Sites

As noted in the assumptions, future traffic noise levels presented in this analysis are based on existing and future traffic volumes provided by Intersecting Metrics (2023). These future volumes include implementation of the TCSP area, AEN, and construction of the Housing Element sites. TNM software was used to calculate the noise contour distances for Existing and Future conditions for the 2050 horizon year. The off-site roadway modeling represents a conservative analysis that does not consider topography or attenuation provided by existing structures. The results of this analysis for the CNEL at 100 feet from the roadway centerline are shown in Table 4.12-5, *Traffic Noise Levels – 2050 Horizon year.* Additional analysis for the 75, 70, 65, and 60 CNEL distances are provided in Appendix F. Vehicular traffic noise level contours for the 2050 horizon year are depicted in Figure 4-12.1, *Transportation Noise Contours – No Project* and Figure 4-12.2, *Transportation Noise Contours – With Project*. The noise levels are expressed in terms of CNEL. All noise contours depict the predicted noise level based on existing traffic volumes, and do not reflect attenuating effects of existing features such as noise barriers, buildings, topography, and dense vegetation.

A significant direct impact would occur if existing noise conditions approach or exceed the City significance thresholds for traffic noise for nearby land uses and the project more than doubles (increases by more than 3 CNEL) the existing noise level.

When measured at 100 feet from a given roadway's centerline, noise levels along some roadways may exceed 65 CNEL with or without implementation of the project. Noise levels from traffic associated with implementation of the TCSP area, AEN, and Housing Element sites would increase by up to 0.3 CNEL. Noise level increases below 3 CNEL are not perceptible. Traffic operational noise is less than significant for the TCSP area, AEN, and Housing Element sites.

Outdoor Performances

Housing Element Sites

No outdoor performance areas are proposed for the Housing Element sites. No impact will occur.

2. Groundborne Noise and Vibration

Threshold: Would the Project result in exposure of persons to or generation of excessive groundborne vibration of groundborne noise levels?

Finding: Less than significant. (Draft PEIR, p. 4.12-22 through 4.12-23)

Explanation: **Housing Element Sites**

A possible source of vibration during construction of the Housing Element sites would be a vibratory roller, which may be used for compaction of soil beneath building foundations. Most usage of a vibratory roller, however, would occur at distances greater than 50 feet from any single residence due to the mobile nature of its use across the large project sites. A vibratory roller would create approximately 0.210 inch per second peak particle velocity (PPV) at a distance of 25 feet (Caltrans 2020). A 0.210 inch per second PPV vibration level would equal 0.098 inch per second PPV at a distance of 50 feet.[1] This would be lower than the "strongly perceptible" impact for humans of 0.1 inch per second PPV. Additionally, off-site exposure to such ground-borne vibration would be temporary as it would be limited to the short-term construction period. Construction of the Housing Element sites is anticipated to require the use of a vibratory roller and are not anticipated to be used within 50 feet of any nearby residences. At these distances, impacts would be less than significant.

3. Airport Noise

Threshold: Would the project be 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, and expose people residing or working in the area to excessive noise levels?

Finding: Less than significant. (Draft PEIR, pp. 4.12-24)

Explanation: **TCSP Area and AEN**

The TCSP area is subject to some aircraft noise associated with Gillespie Field, located approximately 0.5 miles to the south. The TCSP area is mostly located in locations that would be exposed to noise levels below 60 community noise equivalent level (CNEL). Portions of the commercial areas north of Mission Gorge Road and

[1] Equipment PPV = Reference PPV * $(25/D)^n$ (inches per second), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.1 (the value related to the attenuation rate through the ground); formula from Caltrans 2013.

west of Town Center Parkway are located within an area that would be exposed to 60 CNEL. The aircraft noise levels within these areas would not exceed the land use compatibility standards of 70 CNEL for commercial uses described in the City General Plan Noise Element. Impacts would be less than significant.

Housing Element Sites

As described above, only commercial uses would be exposed to aircraft noise levels exceeding 60 CNEL. Housing Element sites would not be located in these areas and impacts would be less than significant.

L. POPULATION AND HOUSING

1. Induce Unplanned Population Growth

Threshold: 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 road or other infrastructure?

Finding: Less than significant. (Draft PEIR, pp. 4.13-4 through 4.13-5)

Explanation: **TCSP Area and AEN**

Buildout of the proposed TCSP would result in potential future construction of up to 3,140 new residential units, providing capacity for projected growth in the region consistent with the densities and intensities allowed by existing zoning, the 2021-2029 Housing Element and state density bonus law. The TCSP would also allow the expansion of non-residential uses that could generate jobs within the City consistent with the projections provided in Table 4.13-3. Further, infrastructure may be upgraded within certain locations to meet the demand of the planned developments. These infrastructure improvements would not extend into previously unserved areas or provide excess capacity beyond planned growth. No unplanned direct or indirect population growth would occur from implementation of the TCSP area. Impacts would be less than significant.

Housing Element Sites

The Housing Element sites would facilitate the development of 1,480 residential units that would allow the City and region to achieve their housing goals. This is consistent with the adopted zoning designations and densities currently allowed within the Housing Element sites. The project would further implement SANDAG's vision

and goals by placing higher density in areas most able to support residential growth, including existing infrastructure and access to transit and would therefore be consistent with the Regional Transportation Plan/Sustainable Communities Strategy. The project would not induce substantial unplanned population growth as the Housing Element sites are in an urbanized area with access to services, roadways, and utilities. Additionally, the Housing Element sites are already designated for high-density development in the City's General Plan. Impacts would be less than significant.

2. Displace People or Housing

Threshold: Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Finding: Less than significant. (Draft PEIR, pp. 4.13-5 through 4.13-6)

Explanation: **TCSP Area and AEN**

While specific future projects within the TCSP area are not currently known, future residential development within the TCSP area would have the potential to displace some people and housing through demolition of existing residential structures. However, if a home were removed, more housing units would be provided in its place, which would accommodate more people and ensure no net loss of housing. Impacts related to displacement of people and housing would be less than significant.

Housing Element Sites

Sites 16A, 16B, 20A, and 20B are vacant parcels that do not contain existing housing development. As a result, buildout of the Housing Element sites would not result in the demolition of existing housing, and impacts related to displacement of people and housing would be less than significant.

M. PUBLIC SERVICES

1. Fire Protection

Threshold: Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered fire emergency facilities to maintain service ratios, response times, or other performance objectives, and the construction of which could cause significant environmental impacts?

Finding: Less than significant. (Draft PEIR, pp. 4.14-9 through 4.14-10)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

As described in Section 3.0, *Project Description*, the TCSP anticipates replacement of Station 4 at its current location with a new facility up to 20,000 square feet in size. However, the site specific design and details of this facility are unknown at this time. At the time the future Station 4 replacement is proposed, it would undergo project-specific environmental review with consideration of the analysis and mitigation framework established in this EIR. No additional construction or operational impacts beyond those identified throughout this EIR have been identified due to the replacement of Station 4.

While future development in the TCSP area, AEN, and Housing Element sites would accommodate future population growth in the City, construction of new residential and non-residential development within the project area could also increase demand for fire protection facilities. All future development, whether discretionary or by-right, would be required to adhere to the SMC. Specifically, Chapter 12.50, would require payment of a DIF to cover the costs of constructing public facilities that are reasonably related to the impacts of the new development. Likewise, future project compliance with the City's General Plan requires land developers to pay the cost of ensuring adequate public services and facilities. Safety Element Policy 4.2 requires that all new development meets established response time standards for fire and life safety services, and Policy 4.12 requires the timing of additional fire station construction or renovation, or new services to be related to the rise of service demands. Each incremental development would pay DIF towards anticipated fire facility needs that would ultimately support funding for improvements to fire facilities and operations. At the time future fire facilities are proposed, they would require a separate environmental review, and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new fire facilities. Therefore, impacts related to the need for and/or provision of new or physically altered fire emergency facilities would be less than significant.

2. Police Protection

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities to maintain service ratios, response times, or other performance objectives, need for new or physically altered

governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any of the public services?

Finding: Less than significant. (Draft PEIR, pp. 4.14-10 through 4.14-11)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

While future development in the TCSP area, AEN, and Housing Element sites would accommodate future population growth in the City, construction of new residential and non-residential development within the project area could potentially increase demand for police protection facilities. All future development, whether discretionary or by-right, would be required to adhere to the SMC. Specifically, Chapter 12.50, would require payment of a DIF to ensure the costs of constructing public facilities that are reasonably related to the impacts of the new development. Likewise, future project compliance with the City's General Plan requires land developers to pay the cost of ensuring adequate public services and facilities. Safety Element Policy 4.2 requires that all new development meets established response time standards for fire and life safety services, and Policy 4.12 requires the timing of additional fire station construction or renovation, or new services to be related to the rise of service demands. The review of project applications by law enforcement personnel would ensure that City's police department are comfortable with the level of safety associated with the proposed development. In the future, if law enforcement facilities are proposed, they would require a separate environmental review, and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new fire facilities. Therefore, impacts related to the need for and/or provision of new or physically altered police facilities would be less than significant.

3. Schools

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities to maintain service ratios, response times, or other performance objectives, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any of the public services?

Finding: Less than significant. (Draft PEIR, pp. 4.14-11 through 4.14-12)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

The Santee School District (SSD) and the Grossmont Union High School District (GUHSD) were contacted to determine their availability to accommodate student enrollment generated by the project. The SSD has a full capacity of 7,808 and a current enrollment of 6,091, leaving a future enrollment capacity of 1,717 more students. The GUHSD has a full capacity of 20,000 and a current enrollment of 16,528, leaving a future enrollment capacity of 3,472 more students.

The proposed TCSP would facilitate the potential future construction of up to 3,140 new residential units. As described below, up to 1,480 of these units would be constructed in the Housing Element sites, leaving 1,660 units to be constructed through future projects in the TCSP area. The SSD estimates that the addition of 3,140 multi-family residential units would generate an additional 501 students. This number is well within the remaining capacity of the SSD and the elementary schools that service the project area. However, given the location of newly proposed residential uses and existing school service area boundaries, students may be directed to schools that are located more than a mile from their homes, requiring traversing the San Diego River to attend Hill Creek School and perhaps walking in areas with no sidewalk improvements. As the TCSP area develops there may be a need to redirect some students to Rio Seco Elementary and/or make improvements to pedestrian accessways, such as the proposed River Bridge and other multimodal improvements identified in the TCSP Chapter 3: Mobility and Beautification.

The GUHSD estimates that the addition of 3,140 multi-family residential units would generate an additional 430 students, which is also well within the remaining capacity of the GUHSD. However, only two high schools in the GUHSD, Santana High School and West Hills High School, would service the TCSP area. According to the GUHSD, buildout of the Housing Element sites would generate an additional 202 students which would require the addition of six classroom teachers and up to six classrooms, depending on which school future students choose to attend. Future construction of the remaining 1,660 units in the TCSP area would likely require additional facilities, but updated school capacities would be analyzed at the time of future project finalization.

To reduce impacts to school facilities, all future development would be required to adhere to state statutory fees pursuant to SB 50.

Specifically, the SSD and GUHSD each currently levy impact fees on development within their district boundaries; for SSD and GUHSD, residential development fees are $3.21 per square foot (/sf) and $1.20/sf, respectively. Commercial development fees are $0.52/sf and $0.19/sf, respectively (SSD 2024; GUHSD 2024). The statutory fees provided by project development would contribute to the expansion of necessary school services and ensure impacts to school facilities remain less than significant. Future development of the remaining 1,660 units in the TCSP area would contribute similar fees to both school districts upon project finalization and ensure impacts to school facilities remain less than significant.

4. Library Services

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities to maintain service ratios, response times, or other performance objectives, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any of the public services?

Finding: Less than significant. (Draft PEIR, pp. 4.14-12 through 4.14-13)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

As noted in Section 4.14.1.4, based on the San Diego County service ratio goals for library services the Santee Library, with 75,000 square feet of space, is at a deficit; however, including the combination of a cooperative library system with surrounding cities, and participation in Bookmobile, library service within the City is considered to be adequate. Nonetheless, construction of additional development could potentially increase demand for library services.

All future development, whether discretionary or by-right, would be required to adhere to the SMC. Specifically, Chapter 12.50, would require payment of DIF to ensure the costs of constructing public facilities that are reasonably related to the impacts of the new development, including libraries. Additionally, the City would continue to participate in programs related to providing residents access to library books and programs and support the efforts of the Friends of Santee Library, a non-profit organization committed to raising funds for a new larger library. Development within the project site would not directly result in sufficient demand to require construction or expansion of a library, since each incremental development would

pay its fair share toward anticipated library facility needs. At the time a future library is proposed, it would require a separate environmental review, and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new library facilities. Therefore, impacts related to the need for and/or provision of new or physically altered library would be less than significant.

5. Park Facilities

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities to maintain service ratios, response times, or other performance objectives, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any of the public services?

Finding: Less than significant. (Draft PEIR, pp. 4.14-13 through 4.14-14)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

As detailed in Section 4.14.1.5, the City currently meets its overall goal for parkland; however, construction of development could potentially increase demand for park and recreational facilities. The TCSP anticipates new park and recreational facilities in the future, and potential impacts to recreation are discussed in Section 4.15, *Recreation*.

All future development, whether discretionary or by-right, would be required to pay in-lieu fees consistent with the Quimby Act and SMC Section 12.40 to fund additional park facilities within the City. Payment of such fees would allow the City to continue to implement numerous General Plan policies in place to maintain park and recreation facilities within the City, including Land Use Policy 3.1 (adequate parkland consistent with development); Conservation Element Policies 11.1, 11.2, and 11.4 (promote dedicated open space, both active and passive, throughout the City); Recreation Element Policies 1.1 and 2.2 (increase parkland ratios, and focus on recreational facilities to be constructed in mixed-use development); and numerous Trails Element policies which all envision the continued development of bicycle, equestrian and pedestrian trails throughout the City. Development within the project site would not directly result in sufficient demand to directly require construction or

expansion of parks and recreational facilities, since each incremental development would pay its fair share toward anticipated park needs.

As discussed in Section 4.15, the TCSP proposes a pedestrian River Bridge across the San Diego River in an area designated Floodway/Open Space. Riverview Art Trail is a proposed pedestrian linkage connecting Riverview Parkway at the north to Mission Gorge Road at the south and is designated Park/Open Space in the TCSP. The TCSP would also strive to connect future development to the San Diego River trails. These elements would contribute to City parkland and potential impacts of these elements are discussed throughout this EIR. At the time a future parkland project is proposed, it would require environmental review, and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new park facilities. Therefore, impacts related to the need for and/or provision of new or physically altered parks and recreation facilities would be less than significant.

N. RECREATION

1. Existing Recreational Facilities

Threshold: 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?

Finding: Less than significant. (Draft PEIR, pp. 4.15-8)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

As detailed in Section 4.15.1.1, the City currently meets its overall goal for parkland; however, construction of additional residential units could potentially increase demand for park and recreational facilities. All future development, whether discretionary or by-right, would be required to pay in-lieu fees consistent with the Quimby Act and SMC Section 12.40 to fund additional park facilities within the City. Payment of such fees would allow the City to continue to implement numerous General Plan policies in place to maintain park and recreation facilities within the City, including Land Use Policy 3.1 (adequate parkland consistent with development); Conservation Element Policies 11.1, 11.2, and 11.4 (promote dedicated open space, both active and passive, throughout the City); Recreation Element Policies 1.1 and 2.2 (increase parkland ratios, and focus on recreational facilities to be constructed in mixed-use development); and numerous Trails Element policies which all envision the continued development of bicycle, equestrian and pedestrian trails

throughout the City. The TCSP also envisions several recreational opportunities to be added to the City. Development within the TCSP area, AEN, and Housing Element sites would not result in sufficient demand to directly require construction or expansion of parks and recreational facilities. At the time a future recreational facility is proposed, it would require a separate environmental review, and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new park facilities. Therefore, impacts related to the need for and/or provision of new or physically altered parks and recreation facilities would be less than significant.

2. New Recreational Facilities

Threshold: 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?

Finding: Less than significant. (Draft PEIR, pp. 4.15-9)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

The TCSP does not currently provide project-level details regarding specific proposed recreational facilities in the TCSP area, AEN, or Housing Element sites. However, as buildout of the TCSP area occurs, recreational facilities may be proposed. Potential features described in the TCSP include passive recreation amenities (community gardens, outdoor gathering/seating areas, picnic/barbeque areas, pet/dog parks, courtyards, plazas) and active recreation amenities (playgrounds/tot lots, sport courts/fields, outdoor fitness areas, swimming pools, exercise structures, clubhouses with kitchens, recreation halls). The TCSP also proposes a pedestrian River Bridge across the San Diego River in an area designated Floodway/Open Space. Riverview Art Trail is a proposed pedestrian linkage connecting Riverview Parkway at the north to Mission Gorge Road at the south and is designated Park/Open Space in the TCSP. The TCSP would also strive to connect future development to the San Diego River trails.

All future development, whether discretionary or by-right, would be required to pay in-lieu fees consistent with the Quimby Act and SMC Section 12.40 to fund additional park facilities within the City. Payment of such fees would allow the City to continue to implement numerous General Plan policies in place to maintain park and recreation facilities within the City, including Land Use Policy 3.1 (adequate parkland consistent with development); Conservation

Element Policies 11.1, 11.2, and 11.4 (promote dedicated open space, both active and passive, throughout the City); Recreation Element Policies 1.1 and 2.2 (increase parkland ratios, and focus on recreational facilities to be constructed in mixed-use development); and numerous Trails Element policies which all envision the continued development of bicycle, equestrian and pedestrian trails throughout the City. Development within the TCSP area, AEN, and Housing Element sites would not result in sufficient demand to directly require construction or expansion of parks and recreational facilities, since each incremental housing development would pay its fair share toward anticipated park needs. At the time a future parkland or recreational project is proposed, it would require environmental review, and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new park facilities. Therefore, impacts related to the need for and/or provision of new or physically altered parks and recreation facilities would be less than significant.

O. TRANSPORTATION

1. Circulation System

Threshold: Would the project conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Finding: Less than significant. (Draft PEIR, pp. 4.16-14 through 4.16-15)

Explanation: **TCSP Area and AEN**

The City's Circulation Element of the General Plan guides the overall circulation system in the City. The circulation system in the TCSP area and AEN is guided by the TCSP, which implements the City's Circulation Element. Project approval would involve amendments to the City's General Plan and Zoning Ordinance and the proposed changes to the TCSP circulation system would remain the guiding policy document. The ASP, which was formerly the Bicycle Master Plan, is also a planning document that addresses bicycling opportunities throughout the City.

The proposed TCSP includes a long-range plan to provide circulation throughout the TCSP area and AEN for various modes of transportation, and identifies specific roadway, bicycle, and pedestrian facilities improvements. As shown on Figures 3-5 and 3-6, improvements including bike lanes and multi-use pathways are identified along portions of existing Cuyamaca Street and Riverview

Parkway. New roadway connections along Riverview Parkway, Cottonwood Avenue, Main Street, and Park Center Drive extensions and improvements are also identified and would close gaps in the existing transportation network (see Figure 3-7). The proposed project improvements to the circulation system would become part of the TCSP and would guide future improvements to the circulation system. The City's Mobility Element includes Objective 1.0 and Policy 1.1, which specifies that the City shall provide integrated transportation and land use decisions that enhance smart growth development served by complete streets. The bike lane improvements would also support the Active Santee Plan by increasing bicycling opportunities throughout the TCSP area.

The project would provide a roadway network within the TCSP area that is consistent with the City's Mobility Element and result in improved pedestrian, bicycle, and transit amenities, and foster increased safety for all forms of transportation by providing transportation improvements that would serve all types of travel modes. Thus, impacts related to conflicts with an adopted plan, ordinance, or policy addressing the circulation system would be less than significant for the TCSP and AEN.

Housing Element Sites

Housing Element sites 16A, 16B, 20A, and 20B are located in the AEN and the introduction of new residents and commercial business would have some effect on the circulation system, including transit, roadway, bicycle, and pedestrian facilities. While future development of the Housing Element sites may not require subsequent discretionary approvals or environmental review (if the project is consistent with the TCSP), they would at the least be subject to a ministerial review that would include consistency with the City's Public Works Standards. Per SMC Section 13.11.010 eligible by-right housing projects must comply with all objective development standards and all applicable design, performance, improvement and development standards of the Santee Municipal Code, Santee Town Center Specific Plan, applicable Mitigation Monitoring and Reporting Programs and the Santee General Plan. Where applicable, projects are required to obtain regulatory permits and/or clearances as required by state or Federal law, including, but not limited from agencies such as FEMA, the Federal Aviation Administration (FAA), the United States Fish and Wildlife Agency, the California Department of Fish and Wildlife, the San Diego Airport Land Use Commission (ALUC), and the State Water Resources Control Board. The City's Engineering Division review would ensure individual projects include appropriate frontage requirements to ensure consistency with the

City's Mobility Element and the ASP. Pedestrian and bicycle improvements necessary to meet City Public Work Standards could include providing sidewalks and landscape buffers, Americans with Disabilities Act (ADA) accessibility requirements, and other improvements that would support bicycle, pedestrian, and transit accessibility. To support implementation of these requirements, the project includes objective design and performance standards that would be implemented during the review process for future ministerial development. The standards include a requirement that project applicants shall make roadway improvements along the project frontage including adjoining intersections in accordance with the Mobility Element.

Regarding transit, future development of the Housing Element sites would be consistent with Policy 2.2 of the City's General Plan Land Use Element, which encourages the development of higher density residential developments in areas close to the multi-modal transit station (at Santee Town Center near Housing Element Sites 16A and 16B) and along major road corridors where transit and other convenience services are available (at Magnolia Avenue near Housing Element sites 20A and 20B). Refer to Figure 3-7 for the location of transit including bus stops and the trolley stop at the Santee Town Center in relation to the Housing Element sites. As shown, the project would add density in locations proximate to transit, providing consistency with City policies. No aspects of the projects would conflict with existing transit routes or planned services. Therefore, the project would not conflict with an adopted plan, ordinance, or policy addressing the circulation system and impacts would be less than significant for the Housing Element sites.

2. Vehicle Miles Traveled

Threshold: Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Finding: Less than significant. (Draft PEIR, p. 4.16-15 through 4.16-19)

Explanation: Land Use Development Projects

AEN

As shown in Figure 4.16-2, planned development in the AEN is mostly within a TPA (except for Housing Element Sites 20A and 20B). Therefore, future development in the AEN, except Housing Element sites 20A and 20B as discussed below, is presumed to result in a less than significant transportation impact related to

inconsistencies with CEQA Guidelines Section 15064.3 subdivision (b).

Housing Element Sites 16A and 16B

The project includes development of Housing Element Sites 16A and 16B in the AEN near Santee Trolley Square. Housing Element Sites 16A and 16B are both within ½ mile of a major transit stop at the San Diego Green Line Trolley transit station in the Santee Trolley Square and future development is presumed to result in a less than significant transportation impact related to inconsistencies with CEQA Guidelines Section 15064.3 subdivision (b).

3. Hazards Due to a Design Feature

Threshold: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Finding: Less than significant. (Draft PEIR, p. 4.16-20)

Explanation: **TCSP Area and AEN**

As discussed above in Sections 4.16.5 and 4.16.6, the project includes several transportation improvement projects related to multi-use pathways, bike lanes, and roadways. These improvements are designed to enhance existing connections in the area to improve accessibility, encourage the use of multi-modal facilities, and decrease conflict between vehicles, bicycles, and pedestrians. Specific plans have not been prepared for the transportation improvements in the TCSP area and AEN; however, all future development would be subject to policies set forth in the Mobility Element of the General Plan and designed in accordance with the City's Public Works Standards. Final plans for the proposed transportation infrastructure designs would be subject to review and approval by the City's Engineering Division prior to construction which would include a review for design safety. Implementation of the project would not result in hazards due to a design feature and impacts in the TCSP area and AEN would be less than significant.

Housing Element Sites

Development of Housing Element sites 16A, 16B, 20A, and 20B may require improvements to the existing roadway network at the time plans are prepared for their development. These improvements would be subject to an engineering review to ensure roads and access are

configured consistent with established roadway design standards. Development projects on Housing Element sites 16A, 16B, 20A, and 20B would be subject to a ministerial review that would include consistency with the City's Public Works Standards. The Engineering Division review would consider the potential for design hazards and that improvements are designed consistent with established standards. Impacts related to hazards due to a design feature would be less than significant for the Housing Element sites.

4. Emergency Access

Threshold: Would the Project result in inadequate emergency access?

Finding: Less than significant. (Draft PEIR, p. 4.16-21 through 4.16-22)

Explanation: **TCSP Area and AEN**

The project includes the development of transportation infrastructure projects that would physically alter the existing roadway network. Transportation infrastructure improvements may include narrowing or widening of roadways, adding bike paths and/or bike lanes to road rights-of-way, and connecting existing roadways that may alter existing circulation patterns or points of emergency vehicle access within the TCSP area and AEN. The improvements would involve connections to existing gaps in the transportation network, such as on Riverview Parkway, Cottonwood Avenue, Main Street, and Park Center Drive. Extending these roadways would create a more comprehensive transportation network by providing more direct connections between Town Center area and the adjacent residential neighborhood, and therefore, would improve overall emergency access in the TCSP area and AEN.

In addition, future development would result in new residential dwelling units and new or expanded visitor-serving development including, but not limited to, retail shops, commercial recreational uses, restaurants, and parks. The construction of these future development projects could result in certain elements, such as driveways, access roads, barriers, parking lot, or other circulation-related features that could potentially affect emergency access. However, all future development projects that may occur with the TCSP area would be subject to review by the City's Fire Department, which reviews projects for sufficient emergency access for fire trucks and other emergency vehicles. Thus, all future development projects would be reviewed for certain elements such as width of egress/ingress to ensure the driveways and other access points would be properly sized to allow emergency vehicle access and turn-

around, if necessary. In addition, transportation infrastructure improvements would be constructed in compliance with all applicable standards, including City's Public Work Standards. Therefore, compliance with the applicable regulations and review requirements would ensure that future development within the TCSP area and AEN under the proposed project would not result in inadequate emergency access.

Housing Element Sites

Development of Housing Element sites 16A, 16B, 20A, and 20B may require improvements to the existing roadway network at the time plans are prepared for their development which could affect emergency access. As stated above for the TCSP Area and AEN, all improvements would be subject to an engineering review to ensure roads and access are configured consistent with established roadway design standards. Development projects on Housing Element sites 16A, 16B, 20A, and 20B would be subject to a ministerial review by the City's Fire Department to provide adequate emergency access. Impacts related to inadequate emergency access would be less than significant within the Housing Element sites.

P. UTILITIES AND SERVICE SYSTEMS

1. Water Supply

Threshold: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Finding: Less than significant. (Draft PEIR, pp. 4.18-15 through 4.18-17)

Explanation: **TCSP Area**

The Padre Dam Municipal Water District (PDMWD) approved a Water Supply Assessment in July 2024 for the TCSP area confirming that adequate water supply is available to serve the project (PDMWD 2024). The Water Supply Assessment accounts for additional water demand based on land use changes and supply that were not considered when the Urban Water Management Plan (UWMP) was last updated in 2020. As shown in Table 4.18-1 and included in the Water Supply Assessment, non-recycled potable and non-potable water use within the PDMWD service area is projected to be 12,442 acre-foot per year (AFY) in 2025 and increase to 15,944 AFY in 2045. The estimate is based on SANDAG demographic estimates included in the PDMWD UWMP which included the anticipated

increase in population from 92,434 in 2020 to 117,701 by the year 2045. Commercial demands account for approximately 11 percent of the total projected 2025 demand and 10 percent of the total projected 2045 demand.

As shown in Table 4.18-4, water supplies are projected to exceed the demands within the PDMWD service area and would adequately cover the demands of the project. Specific projected demands related to normal, dry, and multiple dry years are discussed in the PDMWD UWMP. As shown therein, with continued conservation, the use of recycled water, and the addition of added supply with the upcoming AWP Project, supplies are projected to meet demands through year 2045 under average year, single-dry year, and for a five-consecutive-year drought conditions.

Buildout potential within the TCSP area could result in the construction of additional dwelling units and non-residential square footage that were not previously considered within the latest UWMP but have been considered within the Water Supply Assessment approved by PDMWD for the project. UWMPs are required to be updated on a five-year cycle and the next update to the PDMWD UWMP is anticipated by 2025. Future UWMP updates would account for the anticipated water use associated with future development consistent with the Water Supply Assessment and adopted TCSP. While the proposed TCSP area would add development potential and increase water demand by approximately 42 acre feet per year, the increase in demand could be met by the PDMWD along with additional water supplied by the San Diego County Water Authority (SDCWA). Specifically, the SDCWA has confirmed that it can meet the project demand not considered in the 2020 UWMP through the use of the accelerated forecasted growth component of the Water Authority 2020 UWMP (PDMWD 2024). Therefore, the increase in water demand would be covered in the water district’s projected available water supplies, which are projected to exceed demand through 2045, including during single and multiple dry year scenarios. Additionally, it is noted that higher density residential development is more water efficient than single-family residential development.

Existing regulations would ensure water-efficient fixtures are installed with new development. CALGreen requires 20 percent reduction in indoor water use relative to specified baseline levels. SMC Section 13.10.040 provides minimum standards for residential development and requires that all appliances and fixtures shall be energy conserving (e.g., reduced consumption showerheads, water conserving toilets, etc.). The requirements for the energy efficiency of buildings are set forth in the current California Energy Code for

Climate Zone 10 in which the City is located. Additionally, all new residential units, including accessory dwelling units, shall meet or exceed CALGreen Tier 2 Voluntary Measures.

Additionally, all future projects would be required to adhere to the following ongoing water conservation measures mandated by the PDMWD as authorized by Water Code sections 375 et seq.:

- Stop washing down paved surfaces, including but not limited to sidewalks, driveways, parking lots, tennis courts, or patios, except when it is necessary to alleviate safety or sanitation hazards.

- Stop water waste resulting from inefficient landscape irrigation, such as runoff, low head drainage, or overspray, etc. Similarly, stop water flows onto non-targeted areas, such as adjacent property, non-irrigated areas, hardscapes, roadways, or structures. Irrigation runoff is prohibited.

- Irrigate residential and commercial landscape before 10 a.m. and after 6 p.m. only.

- Do not irrigate while it is raining and within 48 hours after it rains.

- Use a hand-held hose equipped with a positive shut-off nozzle or bucket to water landscaped areas, including trees and shrubs located on residential and commercial properties that are not irrigated by a landscape irrigation system.

- Use recirculated or recycled water to operate ornamental fountains, ponds, and similar decorative water features.

- Wash vehicles using a bucket and a hand-held hose with positive shut-off nozzle, mobile high pressure/low volume wash system, or at a commercial site that re-circulates (reclaims) water on-site. Boats and boat engines may be washed down immediately after use using a bucket or hand-held hose with positive shut-off nozzle. Runoff is prohibited.

- Repair all water leaks within five days of notification by Padre Dam unless other arrangements are made with the CEO/General Manager. Severe water leaks must be stopped immediately.

- Use recycled or non-potable water for construction purposes, such as dust control and soil compaction, when available and required by Padre Dam (PDMWD 2020).

Based on the PDMWD estimated water supply, water efficiency of multi-family development, water conservation requirements, along with existing regulations that require new construction to be water efficient, it is not anticipated that the project would affect the ability of PDMWD to plan for adequate water supplies within the City during normal, dry, and multiple dry years. Impacts would be less than significant.

AEN

While specific projects within the AEN are not currently known, the only residential development anticipated in the AEN is the Housing Element sites, which would add up to an additional 1,480 housing units. The AEN would also add up to an additional 1,792,103 sf of non-residential development. These quantities are included in the analysis performed for the TCSP area. It was determined that water supplies are projected to exceed the needs of the PDMWD service area and would adequately cover the demands of the project. Impacts would be less than significant.

Housing Element Sites

The Housing Element sites would add up to 1,480 new residential units and 389,651 sf of non-residential development. These quantities are included in the analysis performed for the TCSP area. It was determined that water supplies are projected to exceed the needs of the PDMWD service area and would adequately cover the demands of the project. Impacts would be less than significant.

2. Wastewater Treatment

Threshold: 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?

Finding: Less than significant. (Draft PEIR, pp. 4.18-18)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

Development anticipated within the TCSP would occur within areas of the City that are already served by existing wastewater

infrastructure, including pipelines to the PDMWD Wastewater Treatment Plant and Water Recycling Facility. Although future development within the TCSP area, AEN, and Housing Element sites would require connection to existing wastewater infrastructure within surrounding roadways and result in additional wastewater generation, the PDMWD is currently implementing plans to expand the Ray Stoyer Reclamation Facility, which would allow for treatment of wastewater for potable use that would otherwise be discharged to the ocean. Thus, additional capacity improvements would not be anticipated with the project as wastewater flows would ultimately be managed as a potable resource or a recycled water resource. Furthermore, as discussed in Section 4.18.6, higher density residential development would generally be more water efficient that lower density residential and all new development would be subject to water conservation requirements that would help to minimize wastewater flows. All future project applications, whether discretionary or ministerial would be required to adhere to the SMC which requires the assurance of adequate water facilities through payment of development impact fees for the constructing public facilities, which are reasonably related to the impacts of the new development (SMC Chapter 12.30). Additionally, future projects would be required to comply with General Plan policies including Land Use Element Policy 3.6, which requires the review of development projects to ensure that all necessary utilities are available to serve the project. Impacts would be less than significant.

3. Solid Waste

Threshold: 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?

Would the Project comply with federal, state, or local management and reduction statutes and regulations related to solid waste?

Finding: Less than significant. (Draft PEIR, pp. 4.18-19 through 4.18-20)

Explanation: **TCSP Area**

Future development within the TCSP area, including throughout the five proposed neighborhoods, would increase solid waste generation. While specific projects within the TCSP area are not currently known, the project is anticipated to add an additional 3,140 multi-family housing units and 2,287,189 sf of non-residential space, assumed to be commercial for the purposes of this analysis, compared to existing conditions. The addition of 3,140 multi-family housing units would

increase solid waste generation by 12,560 pounds per day. The addition of 2,287,189 sf of commercial development would increase solid waste generation by 11,436 pounds per day. In total, the TCSP area would increase solid waste generation by approximately 23,996 pounds per day. As detailed above, the Sycamore Landfill has a current remaining capacity of approximately 100 million cubic yards, or 168.5 billion pounds, as of 2023. Future projects, whether discretionary or ministerial, would be required to adhere to state and local regulations relating to solid waste and recycling. Specifically, the City is required to meet solid waste diversion goals set forth in the California Integrated Waste Management Act which would decrease waste delivered to the landfill. Additional measures for the reduction of solid waste include goals set by the state to reduce organic waste disposed of in landfills. The City would require future development to contract with available solid waste service providers that would provide the required solid waste disposal, including recycling and organic material recycling to meet exiting State and local requirements. Future projects would also be required to comply with General Plan Safety Element Policy 3.8 which promotes the safe, environmentally sound means of solid waste disposal for the community. Impacts would be less than significant.

AEN

While specific projects within the AEN are not currently known, the only residential development anticipated in the AEN is the Housing Element sites, which would add up to 1,480 units of multi-family housing. The AEN would also add up to 1,792,103 sf of non-residential development, which is assumed to be commercial for the purposes of this analysis. Using the waste generation rates described above, the AEN would increase solid waste generation by approximately 14,880 pounds per day. This is well within the capacity of the Sycamore Landfill, and future development would comply with the necessary state and local requirements, including the General Plan, to ensure impacts to solid waste disposal remain less than significant.

Housing Element Sites

The Housing Element sites would add up to 1,480 units of multi-family housing and up to 389,651 square feet of non-residential development, which is assumed to be commercial for the purposes of this analysis. Using the waste generation rates described above, the Housing Element sites would increase solid waste generation by approximately 7,868 pounds per day. This is well within the capacity of the Sycamore Landfill, and future development would comply with

the necessary state and local requirements, including the General Plan, to ensure impacts to solid waste disposal remain less than significant.

Q. WILDFIRE

1. Emergency Response Plans

Threshold: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Finding: Less than significant. (Draft PEIR, p. 4.19-6 through 4.19-7)

Explanation: **TCSP Area and AEN**

The TCSP, including the AEN, is not within or adjacent to the City's VHFHSZ; however, the northeastern and southwestern portions of the TCSP area are in a WUI zone, which includes areas close to vacant sites with vegetation susceptible to fire. At the program level, the proposed update to the TCSP, including the proposed changes to the TCSP area and the AEN, would not directly result in the construction of new housing or other development but would provide capacity for future development consistent with the TCSP, state Housing Element Law, and state density bonus law. The resulting increase in development and population concentrations within the TCSP and AEN would place some increase in demand on emergency evacuation facilities and services. At the program level, the project would also result in changes in the City's existing circulation network, consisting of plans for roadways and updated roadway facility guidelines and standards establishing pedestrian, bicycle, transit, auto, and parking standards to facilitate connectivity throughout the TCSP area and the AEN.

Emergency response in the City and the TCSP area and AEN is guided by regional and local plans and policies as described in the regulatory framework above and are focused on preparing local resources and training to respond to emergencies. The land uses and anticipated development within the TCSP area and AEN would continue to guide development within the area and would not include land uses that would impair implementation of or physically interfere with the City's emergency response efforts or evacuation routes. Furthermore, applications for future projects within the TCSP area and AEN would be reviewed and approved by the City's Fire Department prior to issuance of building permits to ensure consistency with fire standards and regulations. Additionally, future development would be required to adhere to the City's General Plan

(Safety Element) policies including, 4.2, 4.3, 4.4, 4.11, and 4.12 which address emergency response and emergency evacuation. Future development within the TCSP area and AEN would not conflict with emergency response and impacts would be less than significant.

Housing Element Sites

At the project level, development at Housing Element sites 16A, 16B, 20A, and 20B would also result in an increase in development and population concentrations in the southeastern part of the AEN. However, development at the Housing Element sites would not be within a VHFHSZ or include land uses that would impair implementation of or physically interfere with the City's emergency response efforts, evacuation routes. Temporary construction and development of Housing Element sites 16A, 16B, 20A, and 20B would not conflict with emergency response and impacts would be less than significant.

2. Wildfire

Threshold: 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 uncontrolled spread of wildfire?

Finding: Less than significant. (Draft PEIR, p. 4.19-8)

Explanation: **TCSP Area and AEN**

The TCSP area and AEN are within an urbanized part of the City and are generally not located near areas of wildfire risk. None of the programmatic elements of the project are located within the CAL FIRE VHFHSZ; however, portions of the TCSP area are in a WUI zone (see Section 4.9*)*. Additional development will occur within this WUI zone. Fire safety in general would be addressed by the City's General Plan policies 4.2 through 4.13 which provide guidance for the minimization of fire hazards including ensuring adequate response times, setting standards for emergency access, structural standards, other planning design measures required to be considered in all new development. Additionally, future projects would require review by the Building Official/Fire Marshal that would include review of defensible space and other wildfire protection/preventative measures. Significant impacts related to exacerbating a wildfire risk would not occur in the TCSP area or AEN.

Housing Element Sites

The Housing Element sites are located in the southeastern part of the AEN on vacant and graded sites that are generally flat and located along existing roadways and near existing developed areas. None of the sites are located near slopes or other factors that would exacerbate wildfire risks. Building and occupancy permits for future use of the Housing Element sites would include review for fire safety by the Building Official/Fire Marshal. Significant impacts related to exacerbating a wildfire risk would not occur within the Housing Element sites.

3. Infrastructure

Threshold: Would the project require the installation or maintenance of associated infrastructure (such a 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?

Finding: Less than significant. (Draft PEIR, p. 4.19-9)

Explanation: **TCSP Area and AEN**

The proposed project identifies new roadways and pedestrian and bicycle facilities, and other infrastructure and public facilities improvements throughout the TCSP area, including the AEN. The proposed TCSP Chapter 4, *Infrastructure and Public Utilities*, discusses the water, wastewater, and stormwater facilities that would continue to serve the TCSP area and AEN. The project is not located within the CAL FIRE VHFHSZ and none of the required infrastructure needed to serve future development within the TCSP area or the AEN would exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be less than significant on the TCSP area and AEN.

Housing Element Sites

Development of Housing Element sites 16A, 16B, 20A, and 20B would rely on existing infrastructure in the area such as roads and other utilities and emergency services. None of the Housing Element sites would require the installation or maintenance of associated infrastructure that may exacerbate fire risk and impacts in the Housing Element sites would be less than significant.

4. Flooding or Landslides

Threshold: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Finding: Less than significant. (Draft PEIR, p. 4.19-9 through 4.19-10)

Explanation: **TCSP Area and AEN**

Wildfires can greatly reduce the amount of vegetation on hillsides. Slope failures, mudflows, and landslides are common in areas where steep hillsides and embankments are present, and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. The TCSP area, including the AEN, is generally flat and surrounds the San Diego River. CAL FIRE mapping data indicates low to moderate erosion potential within the City limits. As discussed in EIR Section 4.10 and 4.7, future development within the TCSP area and AEN would not result in significant changes to runoff, slope stability, landslides, erosion, or drainage, and impacts would be less than significant.

Housing Element Sites

The Housing Element sites are in the southeastern part of the AEN on vacant and graded areas that do not have high erosion potential. None of the sites are located near slopes or other factors that would expose people or structures to downslope or downstream flooding risks or landslides. Housing Element sites 16A and 20A are near the San Diego River and are identified as partially within flood hazard areas of the San Diego River; however, as discussed in EIR Section 4.10, development of the Housing Element sites would not result in significant changes to runoff, slope stability, or drainage on either site, and impacts associated with the Housing Element sites would be less than significant.

SECTION III.
IMPACTS THAT ARE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Section 15091 of the State CEQA Guidelines (14 California Code of Regulations [CCR]) and Section 21081 of the Public Resources Code require a lead agency to make findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must make the following findings:

1. *Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;*

2. *Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or*

3. *Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.*

Each of these findings must be supported by substantial evidence in the administrative record. The City determined and makes the finding, based upon the environmental analysis presented in the Final EIR and the comments received by the public on the Draft EIR, that the following impacts can be fully avoided or reduced to a less-than-significant level through the incorporation of feasible mitigation measures into the project, as identified in the Final EIR. For each of these identified impacts, changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR.

The City Council hereby finds that Mitigation Measures have been identified in the EIR and these Findings that will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. The potentially significant impacts, and the Mitigation Measures that will reduce them to a less than significant level, are as follows:

A. AESTHETICS

1. Scenic Vistas

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

Finding: Less than significant with mitigation. (Draft PEIR, pp. 4.1-8 through 4.1-12)

Explanation: **Housing Site 20A**

Housing Site 20A is a mostly vacant parcel containing occasional asphalt and concrete foundations. The site has a land use designation of Residential TC-R-22, which allows 22 to 30 du/ac and is surrounded by existing development to the east and west but sits directly south of the San Diego River. Development of Site 20A could affect visibility to the San Diego River, but Site 20A is not a designated scenic resource or area intended for scenic enjoyment. Site 20A is adjacent to the Edgemoor Polo Barn, which the City values as an aesthetic resource. TCSP Objective Design Standard F, *Historic Site Adjacency*, states that development proposals within Site 20A shall demonstrate project site planning and building design that respects and enhances the Edgemoor Polo Barn site. This includes pedestrian connectivity between proposed uses and the Polo Barn site, landscaping that enhances the Polo Barn site, and building design that incorporates transitions in bulk and scale on areas adjacent to the Polo Barn site. Additionally, development proposals within Site 20A shall demonstrate how they would adhere to the Secretary of Interior Standards for the Treatment of Historic Properties and standards and guidelines prescribed by the State Office of Historic Preservation. As described in Section 4.5, MM-CUL-5 involves the consideration of Objective Design Standard F during future project planning. If avoidance is not possible, the preferred alternative is to preserve the Edgemoor Polo Barn by moving it to another location. Overall adherence to applicable SMC development review and design requirements, in addition to proposed objective design and performance standards, would ensure that future development would not have a substantial adverse effect on a scenic view or vista, and impacts would be less than significant.

2. Visual Character or Quality

Threshold: In non-urbanized areas, would the project 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 publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Finding: Less than significant with mitigation. (Draft PEIR, pp. 4.1-14 through 4.1-15)

Explanation: **Housing Site 20A**

Development of Site 20A could result in indirect visual character and quality impacts due to changes affecting the visual environment surrounding the Edgemoor Polo Barn. Specifically, development within a visual radius of the barn could result in indirect impacts to the historic resource related to the visibility of the resource and/or altering its surrounding visual character. General Plan Policy 12.1 is aimed at the protection of historic buildings. Policy 12.1 requires that future development respects and enhances the Edgemoor Polo Barn setting. As part of the development review process, development at Site 20A would be required to demonstrate a project design that respects and enhances the adjacent historic resource. Development at Site 20A could result in significant impacts to visual character and quality and mitigation measure CUL-5 is required.

B. BIOLOGICAL RESOURCES

1. Sensitive Species

Threshold: 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?

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.4-17 through 4.4-31)

Explanation: **TCSP and AEN**

Special Status Plant Species

Development of the TCSP area and the AEN would result in impacts to three special status plant species: smooth tarplant and southwestern spiny rush, and white rabbit-tobacco. All other special status plant species observed on-site would either remain undisturbed or be conserved in open space. A total of 243 smooth tarplant individuals and two southwestern spiny rush individuals, and six white rabbit-tobacco individuals observed within the project area would be impacted by the proposed project. No special status plant species were determined to have a high potential to occur within the project area.

Federal or State Listed Plant Species

No impacts would occur to federally and/or state listed plant species as none were documented within the TCSP area or the AEN.

CRPR 1 or 2 Listed Plant Species

Generally, impacts to plant species with a California Native Plant Society (CNPS) California Rare Plant Ranks (CRPR) of 1 or 2 are considered potentially significant due to their higher sensitivity status, and the impact analysis evaluates substantial adverse effects to these species. Implementation of the proposed project has potential to result in direct impacts to the following special status plant species with a CRPR of 1 or 2: smooth tarplant.

Smooth Tarplant

Approximately 243 individuals of smooth tarplant occur in the TCSP area and the AEN. Implementation of mitigation measure BIO-6 would ensure that future development impacts on smooth tarplant in the TCSP area and the AEN are reduced to a less than significant level.

White rabbit-tobacco

Approximately six individuals of white rabbit-tobacco occur in the TCSP area and the AEN. Implementation of mitigation measure BIO-6 would ensure that future development impacts on smooth tarplant in the TCSP area and the AEN are reduced to a less than significant level.

CRPR 3 or 4 Listed Plant Species

CRPR 3 and 4 species are relatively widespread and impacts to such species would not substantially reduce their populations in the region and are not significant. Implementation of the project is anticipated to result in direct impacts to the following special status plant species with a CRPR of 3 or 4: southwestern spiny rush.

Southwestern Spiny Rush

One individual occurs within the TCSP area on conserved land designated as Park/Open Space along an unnamed tributary to the San Diego River. A second individual occurs within the TCSP area outside conserved lands at the southern terminus of Park Center Drive. Additionally, a third individual occurs within the TCSP area and AEN outside conserved lands at the southern terminus of Park Center Drive. Project impacts to southwestern spiny rush would be less than

significant because this relatively widespread species is known to occur elsewhere in the project vicinity, such that the local long-term survival of the species would not be impacted by impacts to two individuals. The impacted individuals are not part of a population at the periphery of the species' range, located in an area where the taxon is especially uncommon, or occurring on unusual substrates. Lastly, there are numerous documented occurrences of this species throughout the region, including on conserved lands, indicating that the project does not represent a geographically significant population.

Other Special Status Plant Species

Implementation of the proposed project is not anticipated to result in impacts to other special status plant species known from or with high potential to occur in the project area. These species are expected to be avoided by project activities due either to the species' location being outside of the proposed development footprint, or the lack of suitable conditions (habitat, soils, hydrology, elevations, etc.) within the development footprint. However, due to the long-term nature of the project, potential additional or new populations of special status plant species could be discovered in the future, including Multiple Species Conservation Program (MSCP) Narrow Endemic species. Project impacts to special status plant species may be considered significant depending on the species, sensitivity, and the number of plants to be impacted. Significant impacts to special status plant species, if determined to occur, would require mitigation, including species-specific mitigation, consistent with the City's General Plan (City 2003b). Implementation of mitigation measure BIO-6 would ensure that future development impacts on sensitive resources that occur adjacent to project work limits are avoided. Additionally, mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be revegetated to native habitats following completion of construction activities.

Special Status Animal Species

Implementation of the proposed project has potential to result in direct impacts to habitats occupied or suitable for special status wildlife species. These habitats include wetland and riparian habitats, open water/lake, Diegan coastal sage scrub and various subtypes of this habitat, and non-native grassland. Such impacts would be a result of development activities such as vegetation removal, which could cause loss of habitat and/or direct injury or mortality to individuals. These impacts are described below.

Federally or State Listed Animal Species

Implementation of the proposed project would impact locations where the following three listed animal species have been documented within the proposed project area or have high potential to occur: coastal California gnatcatcher (CAGN), least Bell's vireo, and western spadefoot toad; additional information is provided below. Nesting and migratory birds also may be impacted by future development.

Coastal California Gnatcatcher

Implementation of the proposed project within both the TCSP area and AEN would result in impacts to CAGN from the removal of 14.1 acres of Diegan coastal sage scrub (comprising disturbed, baccharis-dominated, and disturbed baccharis-dominated). Impacts from the TCSP area and AEN total no more than 8.7 acres of disturbed Diegan coastal sage scrub and 5.4 acres of Diegan coastal sage scrub: Baccharis dominated (including disturbed). Impacts to occupied and potential CAGN habitat within the TCSP area and AEN are considered significant and would require mitigation.

If construction or operational activities in the TCSP area or AEN were to occur during the CAGN breeding season (March 1 through August 15) and impact occupied CAGN habitat, direct impacts to nesting CAGN would be considered significant and would require mitigation. Through the implementation of mitigation measures BIO-6, BIO-7, BIO-8, and BIO-9 impacts to this species would be reduced to less than significant. Additionally, mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be revegetated to native habitats following completion of construction activities.

Least Bell's Vireo

A maximum amount of 7.93 acres of suitable habitat for least Bell's vireo may be impacted by development of the TCSP area, AEN, and Site 16A areas. Suitable breeding habitat for the least Bell's vireo within the TCSP area comprises 0.01 acre of southern riparian forest, 6.57 acres of southern arroyo willow riparian forest, 0.72 acre of southern riparian scrub (including disturbed and restoration), 0.47 acre of southern willow scrub, and 0.16 acre of tamarisk scrub. Suitable breeding habitat for the least Bell's vireo within the AEN comprises 1.52 acres of southern arroyo willow riparian forest, 0.03 acre of southern riparian scrub (restoration), 0.47 acre of southern willow scrub, and 0.16 acre of tamarisk scrub. If construction or operational activities were to occur during the vireo breeding season (March 15 through September 15) and impact occupied least Bell's

vireo habitat, direct impacts to nesting least Bell's vireo would be considered significant and would require mitigation. Additionally, indirect impacts to least Bell's vireo would occur if construction activities were to take place during the vireo breeding season and were to generate noise levels greater than 60 A-weighted decibels (dBA) or exceed ambient noise levels if greater than 60 dBA, within occupied least Bell's vireo habitat. Through the implementation of mitigation measures BIO-6, BIO-7, BIO-8, and BIO-9, impacts to this species would be reduced to less than significant. Additionally, mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be revegetated to native habitats following completion of construction activities.

Western Spadefoot Toad

The western spadefoot toad has high potential to occur in sparse riparian habitat along the San Diego River. Construction activities related to the implementation of the proposed project could impact western spadefoot toad. Through implementation of mitigation measure BIO-6 and BIO-10 impacts to this species would be reduced to less than significant. Additionally, mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be revegetated to native habitats following completion of construction activities. Therefore, impacts to western spadefoot toad would be less than significant.

Nesting Birds

The project area contains trees, shrubs, and other vegetation that provide suitable nesting habitat for common birds, including raptors (such as Cooper's hawk), protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game (CFG) Code. Construction of the proposed project could result in the removal or trimming of trees and other vegetation during the general bird nesting season (January 15 through July 15 for raptors and February 1 – September 15 for general avian species) and, therefore, could result in impacts to nesting birds in violation of the MBTA and CFG Code. The proposed project construction within 500 feet of breeding habitat for nesting birds could result in adverse indirect impacts related to construction or operational noise. Impacts to nesting birds and temporary (foraging, migration, and dispersal) habitat would be significant. However, through the implementation of mitigation measures BIO-7, BIO-8, and BIO-9, impacts to nesting birds would be reduced to less than significant.

Other Special Status Animal Species

Implementation of the proposed project could result in impacts to the following seven other special status animal species with high potential to occur: San Diegan legless lizard, California glossy snake, Belding's orange-throated whiptail, San Diegan tiger whiptail, red diamond rattlesnake, Blainville's horned lizard, and two-striped garter snake.

Potential impacts to other special status animal species would result from the removal of 9.89 acres of wetland and riparian habitats, 18.3 acres of sensitive upland habitats, and 420.7 acres of non-sensitive upland habitats that may support these species. These impacts would be less than significant due to the small number of individuals that would potentially be affected, the relatively small amount of habitat to be impacted, and the large amount of suitable habitat in the project area that would be avoided by activities and would continue to be preserved within conserved lands. Impacts to MSCP-covered species would be less than significant based on adequate species coverage and suitable habitats protected under the MSCP.

Housing Element Sites

Special Status Plant Species

The Housing Element sites would result in impacts to two special status plant species: smooth tarplant and southwestern spiny rush. All other special status plant species observed on-site would either remain undisturbed or be conserved in open space. A total of 110 smooth tarplant individuals observed within the Housing Element sites would be impacted by the proposed project. No special status plant species were determined to have a high potential to occur within the project area.

Federal or State Listed Plant Species

No impacts would occur to federally and/or state listed plant species as none were documented within the Housing Element sites.

CRPR 1 or 2 Listed Plant Species

Generally, impacts to plant species with a CNPS CRPR of 1 or 2 are considered potentially significant due to their higher sensitivity status, and the impact analysis evaluates substantial adverse effects to these species. Implementation of the proposed project has potential to result in direct impacts to the following special status plant species with a CRPR of 1 or 2: smooth tarplant.

Smooth Tarplant

Approximately 110 individuals of Smooth Tarplant occur on Site 16A (Figure 4.4-1). Mitigation measures BIO-1 and BIO-2 would reduce proposed project impacts on Site 16A to less than significant. Mitigation measure BIO-3 and BIO-4 would require the installation of temporary construction fencing and biological monitoring where work limits occur adjacent to known sensitive resources to be avoided, including smooth tarplant individuals. Implementation of mitigation measures BIO-3 and BIO-4 would ensure that additional impacts on sensitive resources that occur adjacent to project work limits are avoided. Additionally, Mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be revegetated to native habitats following completion of construction activities.

CRPR 3 or 4 Listed Plant Species

CRPR 3 and 4 species are relatively widespread and impacts to such species would not substantially reduce their populations in the region and are not significant. Implementation of the project is not anticipated to result in direct impacts to the following special status plant species with a CRPR of 3 or 4: southwestern spiny rush, as these individuals do not occur on sites 16A, 16B, 20A, and 20B (Figure 4.4-1).

Other Special Status Plant Species

Implementation of the proposed project is not anticipated to result in impacts to other special status plant species known from or with high potential to occur in the project area. These species are expected to be avoided by project activities due either to the species' location being outside of the proposed development footprint, or the lack of suitable conditions (habitat, soils, hydrology, elevations, etc.) within the development footprint. However, due to the long-term nature of the project, potential additional or new populations of special status plant species could be discovered in the future, including MSCP Narrow Endemic species. Project impacts to special status plant species may be considered significant depending on the species, sensitivity, and the number of plants to be impacted. Significant impacts to special status plant species, if determined to occur, would require mitigation, including species-specific mitigation, consistent with the City's General Plan (City 2003b). Implementation of mitigation measure BIO-6 would ensure that future development impacts on sensitive resources that occur adjacent to project work limits are avoided. Additionally, mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be

revegetated to native habitats following completion of construction activities.

Special Status Animal Species

Implementation of the proposed project has potential to result in direct impacts to habitats occupied or suitable for special status wildlife species. These habitats include wetland and riparian habitats, open water/lake, Diegan coastal sage scrub and various subtypes of this habitat, and non-native grassland. Such impacts would be a result of development activities such as vegetation removal, which could cause loss of habitat and/or direct injury or mortality to individuals. These impacts are described below.

Federally or State Listed Animal Species

Implementation of the proposed project would impact locations where the following three listed animal species have been documented within the proposed project area or have high potential to occur: CAGN, least Bell's vireo, and western spadefoot toad; additional information is provided below. Nesting and migratory birds also may be impacted by future development as follows.

Coastal California Gnatcatcher

Habitat suitable for CAGN does not occur on sites 16A, 16B, 20A, or 20B. Impact to CAGN would be less than significant in the Housing Element sites.

Least Bell's Vireo

Suitable breeding habitat for the least Bell's vireo within Site 16A comprises 0.19 acre of southern willow scrub. If construction activities were to occur during the vireo breeding season (March 15 through September 15) and impact occupied least Bell's vireo habitat, direct impacts to nesting least Bell's vireo would be considered significant and would require mitigation. Additionally, indirect impacts to least Bell's vireo would occur if construction activities were to take place during the vireo breeding season and were to generate noise levels greater than 60 dBA, or exceed ambient noise levels if greater than 60 dBA, within occupied least Bell's vireo habitat. Through the implementation of mitigation measures BIO-6, BIO-7, and BIO-8 impacts to this species would be reduced to a less than significant level. Additionally, mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be revegetated to native habitats following completion of construction activities.

Western Spadefoot Toad

The western spadefoot toad has high potential to occur in sparse riparian habitat along the San Diego River. Construction related to the implementation of the proposed project, including the Housing Element sites, could impact western spadefoot toad. Through implementation of mitigation measure BIO-6 and BIO-10 impacts to this species would be reduced to less than significant. Additionally, mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be revegetated to native habitats following completion of construction activities. Therefore, impacts to western spadefoot toad would be less than significant in the Housing Element sites.

Nesting Birds

The project area contains trees, shrubs, and other vegetation that provide suitable nesting habitat for common birds, including raptors (such as Cooper's hawk), protected under the MBTA and CFG Code. Construction of the proposed project could result in the removal or trimming of trees and other vegetation during the general bird nesting season (January 15 through July 15 for raptors and February 1 through September 15 for general avian species) and, therefore, could result in impacts to nesting birds in violation of the MBTA and CFG Code. The proposed project construction within 500 feet of breeding habitat for nesting birds could result in adverse indirect impacts related to construction noise. Impacts to nesting birds and temporary (foraging, migration, and dispersal) habitat would be significant. However, through the implementation of mitigation measures BIO-7 and BIO-8, impacts to nesting birds would be reduced to less than significant.

Other Special Status Animal Species

Implementation of the proposed project could result in impacts to the following seven other special status animal species with high potential to occur: San Diegan legless lizard, California glossy snake, Belding's orange-throated whiptail, San Diegan tiger whiptail, red diamond rattlesnake, Blainville's horned lizard, and two-striped garter snake.

Potential impacts to other special status animal species would result from the removal of 9.89 acres of wetland and riparian habitats, 18.3 acres of sensitive upland habitats, and 420.7 acres of non-sensitive upland habitats that may support these species. These impacts would be less than significant due to the small number of individuals that would potentially be affected, the relatively small amount of habitat to

be impacted, and the large amount of suitable habitat in the project area that would be avoided by activities and would continue to be preserved within conserved lands. Impacts to MSCP-covered species within the Housing Element sites would be less than significant based on adequate species coverage and suitable habitats protected under the MSCP**.**

TCSP Area, AEN, and Housing Element Sites

BIO-1 Focused surveys for smooth tarplant will be completed during the blooming period for this species (April to September) prior to clearing and grubbing for development of sites 16A, 16B, 20A, and 20B. Smooth tarplant observed in a proposed impact area will be flagged and avoided during construction. If impacts to smooth tarplant individuals cannot be avoided, mitigation will consist of on- or off-site preservation, translocation, and/or restoration within a Biological Resource Core Area, with a preference for species salvage and transplantation on-site if feasible, as determined by a qualified biologist and approved by the City. Seed material will be sourced from within 25 miles of the City, but if seed is not available, due to seasonality or a poor seeding year, seed collected from southeastern San Diego County may be used. If species are transplanted for mitigation, these species will be included in a plant salvage and translocation plan according to mitigation measure BIO-2.

BIO-2 Prior to vegetation clearing for development of the sites 16A, 16B, 20A, and 20B, if smooth tarplant is being impacted and translocation is selected as part of the mitigation package according to mitigation measure BIO-1, a plant salvage and translocation plan shall be prepared for smooth tarplant impacted by the project. The plan shall, at a minimum, evaluate options for plant salvage and relocation, including native plant mulching, selective soil salvaging, and application/relocation of resources within the project area. Relocation efforts may include seed collection and/or transplantation to a suitable receptor site and will be based on the most reliable methods of successful relocation. The program shall contain a recommendation for method of salvage and relocation/application based on the feasibility of implementation and the likelihood of success. The program shall include, at a minimum, an implementation plan, maintenance and monitoring program, success criteria, estimated completion time, and any relevant contingency measures. The resource salvage plan shall be prepared by a qualified biologist and shall be implemented according to the Mitigation Monitoring and Reporting Program for the project, to the satisfaction of the City.

BIO-3 To help ensure errant impacts to sensitive vegetation communities and jurisdictional waters outside of the impact footprint are avoided during construction in the Housing Element sites, environmental exclusionary fencing, where determined necessary by the qualified biologist, would be installed at the edges of the impact limits before the initiation of grading. All construction staging shall occur within the approved limits of construction. A qualified biologist will monitor the installation of environmental fencing wherever it would abut sensitive vegetation communities. The biologist will periodically monitor the limits of construction operations to ensure that avoidance areas are delineated with temporary fencing and that fencing remains intact. Unless otherwise determined by the monitoring biologist, periodically means once every 14 days after environmental exclusionary fencing has been installed at the edges of the impact limits.

BIO-4 Prior to vegetation clearing for development of the Housing Element sites a qualified biologist shall conduct a Worker Environmental Awareness Program (WEAP) training session for project and construction personnel prior to the commencement of work. The training shall include a description of the species of concern and their habitats, the general provisions of the Federal and California Endangered Species Acts (FESA and CESA), the penalties associated with violating the provisions of the acts, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project area boundaries.

BIO-5 Immediately following completion of temporary construction activities within the TCSP area, AEN, and Housing Element sites, the contractor shall restore the temporary impact areas to pre-construction contours and revegetate the areas with native plant material, as follows: excavated soils and cleared native plant material shall be stockpiled within an appropriate staging area along the edge of the work corridor to the extent feasible; excavated soils shall be backfilled upon completion of construction and recontoured to pre-existing conditions; cleared native plant material shall be distributed over the temporarily disturbed areas; native seed application and installation of native container plants. Plant and seed material will be sourced from within 25 miles of the project area, but if plant and seed material is not available, due to seasonality or a poor seeding year, seed collected from southeastern San Diego County may be used. Maintenance and monitoring of the revegetation shall be provided for a period up to 25 months or for a period sufficient to establish native plant material and to provide vegetative cover that prevents soil erosion. Appropriate landscaping will be selected based on the

vegetation communities within the portion of the study area adjacent to the project. In areas supporting native (or disturbed native) vegetation communities, revegetation of temporarily impacted areas will be with appropriate native plant materials. Only non-invasive plant species will be included in the revegetation plans (species not listed on the California Invasive Plant Inventory prepared by the California Invasive Plant Council ([Cal-IPC] 2024). A qualified landscape architect and/or qualified biologist shall review landscape plant palettes prior to implementation to ensure that no invasive species are included. Any planting stock brought onto the project area shall be inspected to ensure it is free of pest species that could invade natural areas, including but not limited to, Argentine ants (*Linepithema humile*) and South American fire ants (*Solenopsis invicta*). Inspections of planting stock for habitat revegetation shall be by a qualified biologist. Any planting stock found to be infested with such pests shall be quarantined, treated, or disposed of according to best management practices (BMPs) by qualified personnel, in a manner that precludes invasions into natural habitats. Temporary irrigation via irrigation lines and appurtenances (or alternate method approved by the City and qualified biologist) shall be provided by the contractor for a period sufficient to establish plant material and to provide vegetative cover that prevents soil erosion. Irrigation shall be performed in a manner that avoids runoff, seepage, and overspray onto adjacent properties, non-irrigated areas, walls, roadways, waterways, or structures.

TCSP Area and AEN Only (No Housing Element Sites)

BIO-6 Applications for future development outside of sites 16A, 16B, 20A, and 20B, where the City has determined a potential for impacts to sensitive biological resources, shall be required to comply with the following mitigation measure:

a. Prior to issuance of any construction permit or any earth-moving activities, a site specific general biological resources survey shall be conducted to identify the presence of any sensitive biological resources, including any sensitive plant or wildlife species. A biological resources report shall be submitted to the City to document the results of the biological resources survey. The report shall include (1) the methods used to determine the presence of sensitive biological resources; (2) vegetation mapping of all vegetation communities and/or land cover types; (3) the locations of any sensitive plant or wildlife species; (4) an evaluation of the potential for occurrence of any listed, rare, and narrow endemic species; and (5) an evaluation of the significance of

any potential direct or indirect impacts from the proposed project. If suitable habitat for sensitive species is identified based on the general biological survey, then focused presence/absence surveys shall be conducted in accordance with applicable resource agency survey protocols and incorporated into the biological resources report. If potentially significant impacts to sensitive vegetation communities and biological resources are identified, project-level grading and site plans shall incorporate project design features to avoid or minimize direct impacts on sensitive biological resources to the extent feasible, and the report shall also recommend appropriate mitigation to reduce the impacts to below a level of significance, where feasible. Mitigation measures shall be consistent with the standards contained in the Santee Subarea Plan, and projects shall be required to obtain all necessary permits to ensure compliance with applicable federal, state, and local regulations, such as the federal and state Endangered Species Acts. Mitigation ratios for sensitive vegetation community impacts are:

- Wetland habitats – 3:1 ratio
- Diegan coastal sage scrub – 2:1 ratio
- Non-native grassland – 0.5:1 ratio

Mitigation ratios shall be doubled for sensitive vegetation community impacts within the Preserve and Open Space System designated by the Santee Subarea Plan, once adopted.

b. Environmentally Sensitive Areas shall be identified in the biological resources report and avoided to the maximum extent practicable. In areas near or adjacent to Environmentally Sensitive Areas (i.e., natural habitats and vegetation, wetlands, wildlife areas, wildlife corridors), the biological resources report will consider the following measures:

Avoidance of Environmentally Sensitive Areas. In areas near or adjacent to Environmentally Sensitive Areas, construction limits shall be clearly demarcated using highly visible barriers (such as silt fencing), which shall be installed under the supervision of a qualified biologist prior to the commencement of work. Construction personnel shall strictly limit their activities, vehicles, equipment, and construction materials to the project footprint, including designated staging areas, and routes of travel. The construction areas shall be limited to the minimal area necessary to complete the proposed project. The

fencing shall remain in place until the completion of all construction activities and shall be promptly removed when construction is complete.

Biological Monitoring. A qualified biological monitor shall conduct construction monitoring of all work conducted within/adjacent to environmentally sensitive areas during all vegetation removal and ground-disturbing activities such as staging and grading, for the duration of the proposed project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat outside the project footprints and to survey for sensitive wildlife species. When vegetation removal and ground-disturbing activities are not occurring, as needed monitoring at the project areas shall occur.

Worker Environmental Awareness Program. In areas near or adjacent to Environmentally Sensitive Areas, a qualified biologist shall conduct a WEAP training session for project and construction personnel prior to the commencement of work. The training shall include a description of the species of concern and their habitats, the general provisions of the Endangered Species Acts (FESA and CESA), the penalties associated with violating the provisions of the acts, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project area boundaries.

Best Management Practices. During future project construction activities, the following BMPs shall be implemented:

- All equipment maintenance, staging, and dispensing of fuel, oil, or any other such activities shall occur in developed or designated non-sensitive upland habitat areas. The designated upland areas shall be located to prevent runoff from any spills from entering Waters of the US.

- A SWPPP and a soil erosion and sedimentation plan shall be developed (where requirements are met) to minimize erosion and identify specific pollution prevention measures that shall eliminate or control potential point and nonpoint pollution sources onsite during and following the project construction phase. The SWPPP shall identify specific BMPs during project construction to prevent any water quality standard exceedances. In addition, the SWPPP shall contain

provisions for changes to the plan such as alternative mechanisms, if necessary, during project design and/or construction to achieve the stated goals and performance standards.

- Trash shall be stored in closed containers so that it is not readily accessible to scavengers and shall be removed from the construction site on a daily basis.

- Water quality shall be visually monitored by the biological monitor to ensure that no substantial increases in turbidity occur during construction. All relevant natural resource permits and authorizations shall be obtained from appropriate agencies (i.e., U.S. Army Corps of Engineers [USACE], RWQCB, and California Department of Fish and Wildlife [CDFW]) prior to the initiation of construction activities. Permit conditions contained within the permits and authorizations shall be employed throughout the duration of the project.

- Hydrologic connectivity shall be maintained within drainages during the duration of construction. Brush, debris material, mud, silt, or other pollutants from construction activities shall not be placed within drainages and shall not be allowed to enter a flowing stream.

- Dust control measures shall be implemented by the contractor to reduce excessive dust emissions. Dust control measures shall be carried out at least two times per day on all construction days, or more during windy or dry periods, and may include wetting work areas, the use of soil binders on dirt roads, and wetting or covering stockpiles.

- No pets shall be allowed in, or adjacent to, the project areas.

- Rodenticides, herbicides, insecticides, or other chemicals that could potentially harm wildlife or native plants shall not be used near or within Environmentally Sensitive Areas within or near the roadway segments.

- Construction equipment shall be cleaned of mud or other debris that may contain invasive plants and/or

seeds and inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site during construction.

- The cleaning of equipment will occur at least 300 feet from Environmentally Sensitive Area fencing.

- *Use of Native Plants.* All project-related planting and landscaping shall not use plants listed on California Invasive Plant Council. Locally native plants shall be used near open space and native areas to the greatest extent feasible.

TCSP Area, AEN, and Housing Element Sites

BIO-7 Grubbing or clearing of vegetation within the TCSP area, AEN, or Housing Element sites during the general avian breeding season (February 1 to September 15), least Bell's vireo breeding season (March 15 to September 15), coastal California gnatcatcher breeding season (March 1 to August 15), or raptor breeding season (January 15 to July 15) shall be avoided to the extent feasible. If grubbing, clearing, or grading would occur during the breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than three days prior to the commencement of activities to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within 300 feet of the survey area (500 feet for raptors), clearing, grubbing, and grading shall be allowed to proceed in that area. Furthermore, if clearing, grubbing, or grading activities are to resume in an area where they have not occurred for a period of seven or more days during the breeding season, an updated survey for avian nesting will be conducted by a qualified biologist within three days prior to the commencement of clearing, grubbing, or grading activities in that area. If active nests or nesting birds are observed within 300 feet of the survey area (500 feet for raptors), the biologist shall flag a buffer around the active nests, and clearing, grubbing, or grading activities shall not occur within 300 feet of active nests (500 feet for raptors) until nesting behavior has ceased, nests have failed, or young have fledged as determined by a qualified biologist. If the qualified biologist determines that the species will not be impacted with a reduced buffer (i.e., less than 300 feet for general avian species and 500 feet for raptors), potentially with the implementation of avoidance measures to reduce noise, as necessary, and/or the qualified biologist monitors the active nest during clearing, grubbing, or grading to ensure no impacts to the species occur, these activities

may occur outside the reduced buffer during the breeding season, as long as the species is not impacted.

BIO-8 If heavy equipment would be in operation during construction within the TCSP area, AEN, or Housing Element sites during the breeding season for least Bell's vireo (March 15 to September 15), coastal California gnatcatcher (March 1 to August 15), or raptors (January 15 to July 15), pre-construction survey(s) shall be conducted by a qualified biologist, as appropriate, to determine whether these species occur within the areas potentially impacted by noise. If pre-construction surveys determine that active nests belonging to these species are absent from the potential noise impact area (within 300 feet for vireo or gnatcatcher, 500 feet for raptors, or as otherwise determined by a qualified biologist), clearing, grubbing, and grading shall be allowed to proceed. If pre-construction surveys determine the presence of active nests belonging to these species, then clearing, grubbing, and grading within 300 feet of the nest location(s) for vireo or gnatcatcher and 500 feet for raptors, shall: (1) be postponed until a permitted biologist determines the nest is no longer active; (2) be allowed to continue if nest monitoring by a qualified biologist determines that noise levels are not adversely affecting the nesting birds, or (3) not occur until a temporary noise barrier or berm is constructed at the edge of the clearing, grubbing, or grading footprint and/or around the piece of equipment to ensure that noise levels are reduced to below 60 dBA hourly average or to the maximum hourly average ambient noise level if it already exceeds 60 dBA at the nest location. Decibel output for Item (3) will be confirmed by a qualified noise specialist and intermittent monitoring by a qualified biologist will be required to ensure that conditions have not changed.

BIO-9 If periodic noise (such as events) or continuous noise (such as mechanical equipment) generated by standard operation of land uses within the TCSP, AEN, or Housing Element sites 16A, 16B, 20A, and 20B will produce noise levels that will adversely affect nesting birds during the breeding season for least Bell's vireo (March 15 to September 15), coastal California gnatcatcher (March 1 to August 15), or raptors (January 15 to July 15), activities nearby to suitable special-status species habitat on preserved land will be designed and implemented to minimize noise impacts to preserves and wildlife. Operational activities shall be allowed to continue if a noise barrier or berm is constructed at the edge of the suitable special-status species habitat to ensure that noise levels are reduced to below 60 dBA hourly average or the maximum hourly average ambient noise level if it already exceeds 60 dBA at the edge of suitable habitat during the breeding season.

BIO-10 A focused pre-construction survey for special status animal species will be completed by a qualified biologist prior to clearing and grubbing within the TCSP area, AEN, or sites 16A, 16B, 20A, and 20B. Aside from birds, which are covered by other mitigation measures, this survey will focus on the special status animal species identified as having high potential to occur on-site: western spadefoot toad, San Diegan legless lizard, California glossy snake, Belding's orange-throated whiptail, San Diegan tiger whiptail, red diamond rattlesnake, Blainville's horned lizard, and two-striped garter snake. Occupied special status species habitat observed in the proposed impact area will be flagged and avoided during construction until the qualified biologist determines that special status species are no longer using the habitat.

2. Sensitive Vegetation Communities

Threshold: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.4-31 through 4.4-34)

Explanation: **TCSP Area**

The project would result in impacts to jurisdictional wetlands and riparian habitats as defined by the USACE, RWQCB, and CDFW and shown in Figure 4.4-2. These impacts would be considered potentially significant. These impacts would be reduced to a less than significant level through the implementation of mitigation measure BIO-11, which requires the project to obtain wetland permits through the appropriate wetland permitting agencies and would require the in-kind creation of new wetland of the same type lost, at a ratio determined by the applicable regulatory agencies that would prevent any net loss of wetland functions and values.

Indirect impacts to adjacent jurisdictional waters and wetlands could occur through inadvertent intrusion into these adjacent areas by construction vehicles, equipment, and personnel. These impacts would be mitigated through the implementation of mitigation measure BIO-6.

The proposed project, if fully built out, would result in impacts to Diegan coastal sage scrub (including disturbed), Diegan coastal sage scrub: Baccharis-dominated, and non-native grassland, which are

considered sensitive natural communities and require mitigation. The project would also result in impacts to eucalyptus woodland, artificial detention basin, disturbed habitat, and developed land, which are not considered sensitive natural communities. Impacts to non-sensitive vegetation communities are not considered significant and, therefore, do not require mitigation.

Impacts to up to 8.7 acres of Diegan coastal sage scrub (disturbed), 5.4 acres of Diegan coastal sage scrub: Baccharis-dominated (including disturbed), and 4.2 acres of non-native grassland, totaling 18.3 acres) would be reduced to less than significant through implementation of mitigation measure BIO-6. Additionally, mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be revegetated to native habitats following completion of construction activities.

AEN

The AEN portion of the project would result in impacts to jurisdictional wetlands and riparian habitats as defined by the USACE, RWQCB, and CDFW. These impacts would be considered potentially significant. These impacts would be reduced to a less than significant level through the implementation of mitigation measure BIO-11, which requires the project to obtain wetland permits through the appropriate wetland permitting agencies and would require the in-kind creation of new wetland of the same type lost, at a ratio determined by the applicable regulatory agencies that would prevent any net loss of wetland functions and values.

Indirect impacts to adjacent jurisdictional waters and wetlands could occur through inadvertent intrusion into these adjacent areas by construction vehicles, equipment, and personnel. These impacts would be mitigated through the implementation of mitigation measure BIO-6.

The AEN portion of the proposed project would result in impacts to Diegan coastal sage scrub (including disturbed) and Diegan coastal sage scrub: Baccharis-dominated, which are considered sensitive natural communities and require mitigation. The project would also result in impacts to eucalyptus woodland, artificial detention basin, disturbed habitat, and developed land, which are not considered sensitive natural communities. Impacts to non-sensitive vegetation communities are not considered significant and, therefore, do not require mitigation.

Impacts to 8.7 acres Diegan coastal sage scrub (disturbed) and 5.4 acres Diegan coastal sage scrub: Baccharis-dominated (including disturbed; totaling 14.1 acres) would be reduced to less than significant through implementation of mitigation measure BIO-6. Mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be revegetated to native habitats following completion of construction activities.

Site 16A

Development of Site 16A would not result in impacts to sensitive upland natural communities requiring mitigation. Site 16A would result in impacts to artificial detention basin, disturbed habitat, and developed land, which are not considered sensitive natural communities. Impacts to southern willow scrub are discussed below under CDFW jurisdiction.

Waters of the U.S.

According to the Biological Resources Technical Report prepared for the project (Appendix C), development of Site 16A would impact a total of 0.37 acre of wetland and non-wetland waters of the U.S., (Table 4.4-4, *Impacts to Jurisdictional Waters [River Parkways Project]*) comprising 0.04 acre of wetland waters of the U.S. and 0.32 acre of non-wetland waters of the U.S. Mitigation would require re-aligning and widening the Las Colinas channel as mitigation for the Riverview Parkway Project, comprising creation of 0.74 acre waters of the U.S. and 1.24 acres riparian habitat. Additionally, 0.08 acre of existing waters of the U.S. that would be temporarily affected by recontouring (will remain within the widened Las Colinas Channel) will also be revegetated and maintained. These impacts would be mitigated through the implementation of mitigation measure BIO-12. Implementation of mitigation measures BIO-3 and BIO-4 would ensure that additional impacts on sensitive resources that occur adjacent to project work limits are avoided.

California Department of Fish and Wildlife Jurisdiction

Development of Site 16A would impact a total of 1.18 acres of CDFW jurisdictional streambed and riparian areas (Table 4.4-4). A total of 0.19 acre of CDFW jurisdictional habitat, comprising southern willow scrub, occurs within Site 16A. By re-aligning and widening the Las Colinas channel, mitigation will comprise restoration of 1.24 acres riparian habitat. These impacts would be mitigated through the implementation of mitigation measure BIO-12. Implementation of mitigation measures BIO-3 and BIO-4 would ensure that additional

impacts on sensitive resources that occur adjacent to project work limits are avoided.

Sites 16B, 20A, and 20B

The proposed sites 16B, 20A, and 20B would not result in impacts to sensitive natural communities requiring mitigation. Sites 16B, 20A, and 20B would result in impacts to disturbed habitat and developed land, which are not considered sensitive natural communities. Impacts to non-sensitive vegetation communities are not considered significant and, therefore, do not require mitigation. Implementation of mitigation measures BIO-3 and BIO-4 would ensure that additional impacts on sensitive resources that occur adjacent to project work limits are avoided. Additionally, mitigation measure BIO-5 would ensure that temporary impacts to vegetation communities will be revegetated to native habitats following completion of construction activities.

TCSP Area, AEN, and Housing Element Sites

BIO-11 Applications where the City has determined a potential for impacts to jurisdictional waters and wetlands shall be required to comply with the following permitting and mitigation framework.

Prior to issuance of any construction permit or any earth-moving activities, a site specific general biological resources survey (BIO-6) shall be conducted to identify the presence of any sensitive biological resources, including any wetlands. Should any potential jurisdictional waters or wetlands be identified on-site during the general biological resources survey, then a jurisdictional wetlands delineation shall be conducted following the methods outlined in the USACE's 1987 *Wetlands Delineation Manual* and the *Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region* or most current USACE guidance. The limits of any riparian habitats on-site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites that may not meet federal jurisdictional criteria but are regulated by the RWQCB.

Avoidance measures based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to jurisdictional waters consistent with federal, state, and City guidelines. Unavoidable impacts to wetlands shall be minimized to the maximum extent practicable and would be subject to alternatives and mitigation analyses consistent with the USACE's and RWQCB's permit processes. Unavoidable impacts would require the project to submit permit applications to the USACE under CWA Section 404,

the RWQCB under CWA Section 401 and/or the State Porter-Cologne Water Quality Control Act, and/or the CDFW under CFG Code Sections 1600 *et seq*., depending on the jurisdictional resources impacted. The permits issued for the project will set the mitigation requirements, which typically require the in-kind creation of new wetland of the same type lost, at a ratio determined by the applicable regulatory agencies that would prevent any net loss of wetland functions and values. (See mitigation measure BIO-12 for the proposed mitigation package for the Riverview Parkway Project.) Wetland creation on-site or within the same wetland system should be given preference over replacement off-site or within a different system. The City shall also control use and development in surrounding areas of influence to wetlands with the application of buffer zones as may be required for wetlands pursuant to federal and/or state permits in accordance to the Land Use Adjacency Guidelines, conservation measures and wetland protection standards in the Draft Subarea Plan Chapter 5. Use and development within buffer areas shall be limited to minor passive recreational uses with fencing, desiltation, or erosion control facilities, or other improvements deemed necessary to protect the habitat, to be located in the upper (upland) half of the buffer when feasible. All wetlands and buffers shall be permanently conserved or protected through the application of an open space easement or other suitable device.

Housing Element Site 16A Only

BIO-11 Site 16A would result in impacts to 0.37 acre of wetland and non-wetland waters of the U.S., 0.37 acre of wetland and non-wetland waters of the State, and 1.18 acres CDFW Jurisdictional Habitat. By re-aligning and widening the Las Colinas Channel, mitigation will comprise creation of 0.74 acre waters of the U.S., 0.74 acre waters of the State, and 1.24 acres riparian habitat. Additionally, 0.08 acre of existing waters of the U.S./State that would be temporarily affected by recontouring (will remain within the widened Las Colinas Channel) will also be revegetated and maintained.

3. Wetlands

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

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.4-35 through 4.4-36)

Explanation: **TCSP Area, AEN, and Housing Element Site 16A**

As previously stated in Section 4.4.6.1, implementation of Site 16A would result in a total of 0.37 acre of wetland and non-wetland waters of the U.S. Impacts to wetland and non-wetland waters of the U.S. would be considered potentially significant. Development of the Riverview Parkway Property, which is inclusive of Site 16A and associated mitigation within the Las Colinas Channel, would impact a total of 1.18 acres of CDFW jurisdictional streambed and riparian areas. A total of 0.19 acre of CDFW jurisdictional habitat, comprising southern willow scrub, occurs within Site 16A. By re-aligning and widening the Las Colinas channel as mitigation for the Riverview Parkway Project, the mitigation will comprise the restoration of 1.24 acres of riparian habitat. These impacts would be mitigated through the implementation of mitigation measure BIO-12. Implementation of mitigation measures BIO-3 and BIO-4 would ensure that additional impacts on sensitive resources that occur adjacent to project work limits are avoided.

Impacts to USACE wetland and non-wetland waters, which are anticipated in Site 16A and in other portions of the AEN and TCSP area as determined through future site-specific studies, would require the implementation of mitigation measures BIO-6, BIO-11, and BIO-12 above. These measures require the project to obtain wetland permits through the appropriate wetland permitting agencies and would require the in-kind creation of new wetland of the same type lost, at a ratio determined by the applicable regulatory agencies that would prevent any net loss of wetland functions and values.

Potential indirect impacts on jurisdictional resources would be prevented during construction through successful implementation of standard BMPs as part of the project's SWPPP. Implementation of a SWPPP and associated BMPs are a regulatory requirement for the proposed project. Specific BMPs may include but would not necessarily be limited to maintaining the project work areas free of trash and debris; employing appropriate standard spill prevention practices and clean-up materials; installing and maintaining sediment and erosion control measures; maintaining effective control of fugitive dust; and properly storing, handling, and disposing of toxins and pollutants, including waste materials. Mitigation measures BIO-3 and BIO-4 identified in Section 4.4.5 would further ensure that no impacts on adjacent resources occur.

4. Habitat Conservation Planning

Threshold: Would the project conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP?

Finding: Less than significant with mitigation. (Draft PEIR, p. 4.4-37 through 4.4-38)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

As noted above, the project area is located within the planning area for the City of Santee Draft Subarea Plan, which has not been adopted. Therefore, the project, as proposed, would not conflict with an adopted HCP, NCCP, or any other approved local, regional, or state HCP. However, in anticipation of the future adoption of the Santee Draft Subarea Plan within the lifetime of future development activities covered by the proposed TCSP, implementation of BIO-6 and BIO-11 is recommended to ensure future development within the project area is consistent with the City of Santee Draft Subarea Plan by requiring site-specific surveys to be conducted for future project-level review to verify the presence of sensitive biological resources occurring on individual sites; determine the extent of any potential impacts; and provide mitigation to reduce the impacts to below a level of significance.

Further, all future projects (discretionary projects and ministerial projects as discussed in SMC Chapter 13.11) would be required to address sensitive species and vegetation communities identified in the City of Santee Draft Subarea Plan and therefore impacts associated with conflicts with an adopted HCP, NCCP, or any other approved local, regional, or state HCP would be less than significant.

Additionally, SMC Code Chapter 8.06 regulates the planting, maintenance, and removal of public trees and Chapter 11.38 regulates the obstruction or interference of any natural watercourse or channel. Chapters 13.08 and 13.16 also require development review procedures and standards pertaining to biological resources. Future development, discretionary or ministerial, would be subject to the City's adopted regulations pertaining to trees or natural water courses. All future projects and residents within the project area would be required to adhere to these policies and regulations; therefore, impacts in the TCSP, AEN, and Housing Element sites would be less than significant.

5. Policies and Ordinances Protecting Biological Resources

Threshold: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.4-38)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

The project does not propose any activities that would conflict with the San Diego Final MSCP Plan, City of Santee Draft Subarea Plan, or local policies or ordinances protecting biological resources. Future development would be required to implement the mitigation framework, including BIO-5, BIO-6, BIO-7, BIO-8, BIO-11, and BIO-12 as applicable to ensure impacts associated with biological resources would be reduced to a level that is less than significant.

C. CULTURAL RESOURCES

1. Historical Resources

Threshold: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines, section 15064.5?

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.5-20 through 4.5-24)

Explanation: **TCSP Area**

As shown in Table 4.5-1, the TCSP area contains previously recorded historic resources. While the TCSP does not specifically propose alteration of a known historic resource, it can be assumed that future development within the TCSP area could have the potential to impact resources directly or indirectly through such activities. The TCSP area has the potential to contain buildings or structures that may be 50 years of age or older at the time of future development and, therefore, may need to be evaluated for historical significance. Direct impacts to historical resources could potentially result from the physical demolition, destruction, relocation, or alteration of potential historic resources within the project areas. Policies 8.1 in the Conservation Element and 12.1 in the Community Enhancement Element of the City's General Plan (City 2003a; City 2003b) are aimed at the protection of historic buildings. As future projects are proposed, they must adhere to these policies and regulations through application of

requirements for development review. However, because site-specific details of specific projects are not known at this program-level of analysis including project footprints, project designs, and timelines for development, impacts to historic resources within the TCSP would be considered significant. The implementation of the mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce these impacts to a level less than significant.

AEN

As shown in Table 4.5-1, the AEN contains previously recorded historic resources. While the AEN does not specifically propose alteration of a known historic resource, it can be assumed that future development within the AEN could have the potential to impact resources directly or indirectly through such activities. The AEN has the potential to contain buildings or structures that may be 50 years of age or older at the time of future development and, therefore, may need to be evaluated for historical significance. Direct impacts to historical resources could potentially result from the physical demolition, destruction, relocation, or alteration of potential historic resources within the project areas. Policies 8.1 in the Conservation Element and 12.1 in the Community Enhancement Element of the City's General Plan (City 2003a; City 2003b) are aimed at the protection of historic buildings. As future projects are proposed, they must adhere to these policies and regulations through application of requirements for development review. However, because site-specific details of specific projects are not known at this program-level of analysis including project footprints, project designs, and timelines for development, impacts to historic resources within the AEN would be considered significant. The implementation of mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce these impacts to a level less than significant.

Housing Element Sites

Site 16A

Although no specific historical resources have been identified in Site 16A, the presence of historical resources throughout the TCSP area suggests that there is a potential for encountering previously unidentified resources. Based on this, future development of Site 16A has the potential to cause substantial adverse changes to historical resources, which is a significant impact. The implementation of mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce these impacts to a level less than significant.

Site 16B

Although no specific historical resources have been identified in Site 16B, the presence of historical resources throughout the TCSP area suggests that there is a potential for encountering previously unidentified resources. Based on this, future development of Site 16B has the potential to cause substantial adverse changes to historical resources, which is a significant impact. The implementation of mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce impacts to a level less than significant.

Site 20A

Site 20A is located adjacent to the Edgemoor Polo Barn, a documented historic resource. The presence of additional historical resources throughout the TCSP area suggests that there is a potential for encountering previously unidentified resources. Future development of Site 20A has the potential to cause substantial adverse changes to historical resources, which is a significant impact. As described in the "Historic Site Adjacency" Objective Design Standards in Chapter 2, *Land Use*, of the TCSP, development proposals must respect and enhance the Edgemoor Polo Barn historic site and demonstrate how they would adhere to the Secretary of Interior Standards for the Treatment of Historic Properties. Specific standards include:

- Pedestrian connectivity between proposed uses and Polo Barn historic site.
- Landscaping that enhances the Polo Barn historic site.
- Building design that incorporates transitions in bulk and scale on areas adjacent to the Polo Barn historic site.
- Development proposals within Site 20A shall demonstrate how they would adhere to the Secretary of Interior Standards for the Treatment of Historic Properties and standards and guidelines prescribed by the State Office of Historic Preservation.

The implementation of mitigation measures CUL-1, CUL-2, CUL-3, CUL-4, and CUL-5 will reduce these impacts to a level less than significant.

Site 20B

Although no specific historical resources have been identified in Site 20B, the presence of historical resources throughout the TCSP area and Site 20B's proximity to the Edgemoor Polo Barn to the north suggests that there is a potential for encountering previously unidentified resources. Based on this, future development of Site 20B has the potential to cause substantial adverse changes to historical resources, which is a significant impact. The implementation of mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce impacts to a level less than significant.

TCSP, AEN, and Housing Element Sites

MM-CUL-1 Prior to approval of an individual project (including the four Housing Element sites) under the TCSP area or AEN, a cultural resources survey shall be conducted for that project. If cultural resources are identified in conjunction with the cultural resources survey, they must be evaluated to assess their eligibility for the CRHR and, thus, whether the project would have an effect on historic properties (cultural resources) per CEQA. If significant effects to historic properties/cultural resources are identified, appropriate avoidance or mitigation measures must be developed as part of the cultural resources study and implemented prior to project development.

MM-CUL-2 Prior to issuance of grading permits for any projects (including the four Housing Element sites) within the TCSP area or AEN: The applicant/developer shall provide evidence to the City of Santee that a qualified professional archaeologist has been contracted to implement a Cultural Resources Management Plan (CRMP), the City must agree to the selected archaeologist and agree to the implementation prescribed in the CRMP. A CRMP shall be developed in coordination with the consulting tribe(s) that addresses the details of all activities and provides procedures that must be followed to reduce the impacts to cultural and historic resources to a level that is less than significant, as well as address potential impacts to undiscovered buried archaeological resources associated with this project.

For each construction project within the TCSP, AEN, or four Housing Element sites, the CRMP shall contain, at a minimum, the following:

Archaeological Monitoring. An adequate number of qualified archaeological monitors shall be on site to ensure all earth-moving activities are observed in areas being monitored. This includes all grubbing, grading, and trenching on-site and for all off-site

improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined and directed by the Project Archaeologist.

Cultural Resources Sensitivity Training. The Project Archaeologist and a representative designated by the consulting Tribe(s) shall attend the pre-grading meeting with the contractors to provide Cultural Resources Sensitivity Training for all construction personnel. Training will include a brief review of the cultural sensitivity of the project and the surrounding area; the areas to be avoided during grading activities; what resources could potentially be identified during earth-moving activities; the requirements of the monitoring program; the protocols that apply in the event unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training, and all construction personnel must attend prior to beginning work on the project site.

Unanticipated Resources: If previously unidentified potentially significant cultural resources are discovered, the Archaeological and/or Tribal Monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Project Archaeologist, in consultation with the Tribal monitor, shall determine the significance of discovered prehistoric archaeological resources. The Project Archaeologist shall determine the significance of discovered historic-period archaeological resources. Further, before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits shall be minimally documented in the field, and the monitored grading can proceed.

Artifact Disposition: The landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. Recovered cultural artifacts shall be curated with accompanying catalog to current professional repository standards or be returned to the appropriate Native American Tribe(s), as agreed upon by the Principal Investigator, Native American representative(s), and City staff.

MM-CUL-3 Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement(s) with the consulting tribe(s) for a Kumeyaay Native American Monitor(s).

In conjunction with the Archaeological monitor(s), the Kumeyaay Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Resources Sensitivity Training for all construction personnel. In addition, an adequate number of Kumeyaay Native American Monitor(s) shall be on-site during all initial ground-disturbing activities and excavation of each portion of the project site, including clearing, grubbing, tree removals, grading, and trenching. In conjunction with the archaeological monitor(s), the Kumeyaay Native American Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

MM-CUL-4 In the event that potential human remains are encountered, ground-disturbing activities within 100 feet of the discovery will be halted, and the requirements of California Health and Safety Code Section 7050.5 will be implemented. The archaeological monitor will immediately notify the Project Archaeologist, who will notify the County Medical Examiner's (ME's) Office. A representative of the ME's Office will determine whether the human remains appear to be Native American in origin. If so, the ME's Office will notify the Native American Heritage Commission (NAHC) who will designate the Most Likely Descendant (MLD). The MLD will make recommendations for the appropriate treatment of the remains and any associated grave goods. The County ME's office will make the determination of the origin of the remains within two working days and will notify the NAHC within 24 hours of their decision if the human remains are determined to be Native American. In the event human remains or burial items are discovered, all parties will refrain from publicly disclosing the reburial location unless otherwise required by law.

Housing Element Site 20A

MM-CUL-5 Avoidance is the preferred measure to mitigate adverse effects to the Edgemoor Polo Barn. Future plans must design around the Polo Barn consistent with the TCSP "Historic Site Adjacency" Objective Design Standard. If avoidance is not possible, the preferred alternative is to preserve the Polo Barn by moving it to another location in accordance with mitigation measures previously published by Bull and Price, as referenced in the Cultural Resources Report (HELIX 2024b; Appendix D).

2. Archaeological Resources

Threshold: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines, section 15064.5?

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.5-24 through 4.5-25)

Explanation: **TCSP Area**

As shown in Table 4.5-2, the TCSP area contains previously recorded archaeological resources (P-37-005669, P-37-007603, and P-37-032878). Future proposed projects within the TCSP area have the potential to cause substantial adverse changes to archaeological resources, including previously unidentified resources. The implementation of mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce these impacts to a less than significant level.

AEN

As shown in Table 4.5-2, the AEN contains previously recorded archaeological resources (P-37-025303, P-37-028466, and P-37-030482). Future proposed projects within the AEN have the potential to cause substantial adverse changes to archaeological resources, including previously unidentified resources. The implementation of mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce these impacts to a less than significant level.

Housing Element Sites

Although no archaeological resources have been identified within Housing Elements 16A, 16B, 20A, and 20B, the presence of archaeological resources throughout the TCSP area suggests that there is a potential for encountering previously unidentified resources. Based on this, future proposed projects within Housing Element sites 16A, 16B, 20A, and 20B have the potential to cause substantial adverse changes to archaeological resources. The implementation of mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce these impacts to a less than significant level.

3. Human Remains

Threshold: Would the Project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.5-25 through 4.5-26)

Explanation: **TCSP Area**

Two previously recorded resources within the TCSP area include the discovery of probable or identifiable human remains. While the proposed project does not specifically propose the disturbance of known human remains, it can be assumed that future development within the TCSP area could have the potential to impact resources directly or indirectly through such activities. Records searches have demonstrated the possible presence of human remains in the project area and potential direct and/or indirect impacts to human remains would be significant. Mitigation measure CUL-4 would be required to reduce impacts to human remains to a less than significant level within the TCSP area.

AEN

The AEN is located entirely within the TCSP area, and it can therefore be assumed that future development within the AEN could have the potential to impact human remains directly or indirectly through such activities. Mitigation measure CUL-4 would be required to reduce impacts to human remains to a less than significant level within the AEN.

Housing Element Sites

Housing sites 16A, 16B, 20A, and 20B are located entirely within the TCSP, and it can therefore be assumed that future development within the Housing Element sites could have the potential to impact human remains directly or indirectly through such activities. Mitigation measure CUL-4 would be required to reduce impacts to human remains to a less than significant level within the Housing Element sites.

D. GEOLOGY AND SOILS

1. Paleontological Resources

Threshold: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Less than significant with mitigation. (Draft PEIR, pp. 4.7-14 through 4.7-16)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

The TCSP area, AEN, and Housing Element sites are all located within the City either within existing developed sites or vacant sites with some history of disturbance. Unique geologic features have not been identified in the project area. The project area contains young and old alluvium and colluvium, which is not typically considered to have a high paleontological resource potential (County 2009). However, alluvial deposits of mountain valleys and older Quaternary alluvial fan deposits may have a moderate potential to contain paleontological resources (County 2009). If grading associated with future projects within the TCSP area, AEN, or Housing Element sites were to occur at depths sufficient to disturb a moderate sensitivity geologic formation, significant impacts could occur. Since it cannot be said with certainty that the project area does not contain formations with moderate paleontological resource sensitivity or that paleontological resources will not be inadvertently encountered during construction activities, potential impacts to paleontological resources would be significant. Mitigation Measures GEO-1 and GEO-2 are required.

TCSP Area, AEN, and Housing Element Sites

GEO-1 To address potential impacts to paleontological resources, the City shall review the project application materials including the geotechnical report to determine if project grading has the potential to disturb geologic formations with the potential to contain paleontological resources. As part of the grading application process, the City may request information from the applicant such as the depth of grading, geologic formations, and paleontological sensitivity in order to determine the potential for impacts. In the event grading may disturb geologic formations with a moderate or high potential to contain paleontological resources, the following monitoring program shall be implemented prior to and during grading operations:

1. Preconstruction Personnel and Repository: Prior to the commencement of construction, a qualified project paleontologist shall be retained to oversee the mitigation program. A qualified project paleontologist is a person with a doctorate or master's degree in paleontology or related field and who has knowledge of the County of San Diego paleontology and documented experience in professional paleontological procedures and techniques. In addition, a regional fossil repository, such as the San Diego Natural History Museum, shall be designated by the City of Santee to receive any discovered fossils.

2. Preconstruction Meeting: The project paleontologist shall attend the preconstruction meeting to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues.

3. Preconstruction Training: The project paleontologist shall conduct a paleontological resource training workshop to be attended by earth excavation personnel.

4. During-Construction Monitoring: A project paleontologist or paleontological monitor shall be present during all earthwork in formations with moderate to high paleontological sensitivity. A paleontological monitor (working under the direction of the project paleontologist) shall be on site on a full-time basis during all original cutting of previously undisturbed deposits.

5. During-Construction Fossil Recovery: If fossils are discovered, the project paleontologist (or paleontological monitor) shall recover them. In most cases, fossil salvage can be completed in a short period of time. However, some fossil specimens (e.g., a bone bed or a complete large mammal skeleton) may require an extended salvage period. In these instances, the project paleontologist (or paleontological monitor) has the authority to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner.

6. Post-Construction Treatment: Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, and cataloged.

7. Post-Construction Curation: Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited in the designated fossil repository.

8. Post-Construction Final Report: A final summary paleontological mitigation report that outlines the results of the mitigation program shall be completed and submitted to the City of Santee within two weeks of the completion of each construction phase of the proposed project. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, inventory lists of cataloged fossils, and significance of recovered fossils.

GEO-2 If fossils are inadvertently discovered anywhere in the TCSP area, the construction contractor shall immediately stop all activities within 100 feet of the fossil and notify the City within 24 hours of the find. Before work can proceed within 100 feet of the find, a project paleontologist (or paleontological monitor) shall be hired to monitor construction activities and recover the fossils.. In most cases, fossil salvage can be completed in a short period of time. However, some fossil specimens (e.g., a bone bed or a complete large mammal skeleton) may require an extended salvage period. In these instances, the project paleontologist (or paleontological monitor) has the authority to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner.

1. Post-Construction Treatment: Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, and cataloged.

2. Post-Construction Curation: Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited in the designated fossil repository.

3. Post-Construction Final Report: A final summary paleontological mitigation report that outlines the results of the mitigation program shall be completed and submitted to the City of Santee within two weeks of the completion of each construction phase of the proposed project. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, inventory lists of cataloged fossils, and significance of recovered fossils.

E. GREENHOUSE GAS EMISSIONS

1. Greenhouse Gas Emissions

Threshold: Would the Project result in GHG emissions that may have a significant impact on the environment?

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.8-19 through 4.8-23)

Explanation: **Housing Element Sites**

The Sustainable Santee Plan Project Consistency Checklist (Checklist) is intended to be a tool for development projects to demonstrate consistency with the Sustainable Santee Plan. The Checklist has been developed as part of the Sustainable Santee Plan implementation and monitoring process and supports the achievement of individual GHG reduction measures as well as the City's overall GHG reduction goals. Additionally, the Checklist supports the City's sustainability goals and policies that encourage sustainable development and aim to conserve and reduce the consumption of resources, such as energy and water, among others. Projects that meet the requirements of the Checklist are considered consistent with the Sustainable Santee Plan and would have a less than significant contribution to cumulative GHG impacts (i.e., the project's incremental contribution to cumulative GHG effects is not cumulatively considerable), pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b).

The Checklist includes a two-step process to determine if a project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan land use and zoning designations for the site. Step 2 consists of an evaluation of the project's design features compliance with the Sustainable Santee Plan's GHG emission reduction measures.

Because the Housing Element sites are being evaluated at the project level for this EIR, consistency with the Checklist is the appropriate method for determining significance of GHG emissions. A Checklist was completed for the development of Housing Element sites 16A, 16B, 20A, and 20B (See Appendix B to Appendix E). These sites are designated for residential land uses in the existing TCSP and zoned for residential development in the City's Housing Element. When compared to the existing zoning and land use designations, the project would not increase the development potential allowed at the four Housing Element sites. Therefore, under Step 1 of the Checklist,

the project is consistent with the land use assumptions used in the Sustainable Santee Plan.

Consistency with Step 2 of the Checklist would require showing how the project is implementing applicable strategies and actions for reducing GHG emissions. This includes strategies related to energy efficiency, tree planting, electric vehicle charging, solid waste reduction, and clean energy. Specifically, Checklist Step 2, measures 2.1 (Increase Energy Efficiency in New Residential Units); 5.1 (Shade Trees); 7.1 (Increase Use of Electric Vehicles); 9.1 (Reduce Waste at Landfills); and 10.1 (Increased Clean Energy Use) are applicable to the Housing Element sites. Because there are no specific project proposals to confirm the strategies are being implemented on these sites, the impact would be potentially significant.

GHG-1 **Increase Energy Efficiency in New Residential Units**. New residential construction shall meet or exceed California Green Building Standards Tier 2 Voluntary Measures, such as obtaining green building ratings including LEED, Build it Green, or Energy Star Certified building certification in scoring development and explain the measures implemented.

GHG-2 **Shade Trees.** The project shall utilize tree planting for shade and energy efficiency such as tree planting in parking lots and streetscapes.

GHG-3 **Increased Use of Electric Vehicles**. The project shall install electric vehicle chargers for 13 percent of total parking provided.

GHG-4 **Reducing Solid Waste Generation.** The project shall provide exterior recycling storage space in accordance with California Green Building Standards and the Santee Municipal Code.

GHG-5 **Increased Clean Energy Use.** The project shall install at least 1 kilowatt per unit of photovoltaic solar systems, unless the installation is infeasible due to poor solar resources established in a solar feasibility study prepared by a qualified consultant submitted with an applicant's formal project submittal to City.

2. Policies, Plans, and Regulations Intended to Reduce GHG Emissions

Threshold: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.8-24 through 4.8-25)

Explanation: **Housing Element Sites**

Because it cannot be confirmed that the project-level CAP Checklist requirements are being implemented on the Housing Element sites, development of the Housing Element sites may not be consistent with the plan and the impact would be potentially significant. As discussed in Section 4.8.5, the project would be consistent with the Sustainable Santee Plan with implementation of mitigation measures GHG-1 through GHG-5.

F. HAZARDOUS AND HAZARDOUS MATERIALS

1. Accidental Release

Threshold: 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?

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.9-16 through 4.9-19)

Explanation: **TCSP area, AEN, and Housing Element Sites**

An accidental release of hazardous materials could occur during (1) the routine use, transport, and disposal of materials during project operation (as discussed above); or (2) through the accidental upset of hazardous materials—either known or unknown—during excavation and construction of future development. Exposure to hazardous materials could occur through contact with contaminated soil or groundwater, skin contact, or the inhalation of vapors or dust.

Future redevelopment or construction activities within the TCSP area, AEN, and Housing Element sites may pose hazards to the public or the environment through the disturbance of existing contaminated soils, groundwater, or hazardous building materials. Grading and excavation activities could disturb soils and cause contaminants below ground to become airborne. Excavation below the groundwater table or dewatering could also bring construction workers in contact with contaminants through skin contact, ingestion, or inhalation.

During construction, workers could also be exposed to hazardous materials during demolition of buildings. Numerous structures within the project area were constructed prior to 1978. Demolition of buildings built prior to 1978 may expose workers to ACMs or LBPs. Inhalation of asbestos containing dust may cause acute or chronic

toxicity. Exposure to persons other than construction workers would be reduced by the exclusion of non-authorized personnel in construction areas determined to contain potentially hazardous materials. Exposure to construction workers would be controlled through conformance with Cal-OSHA worker safety standards. Additionally, California law requires a licensed company to perform asbestos testing and abatement. These requirements ensure that all asbestos removal is completed with all required safety precautions to avoid the release of hazardous materials into the environment. CCR Section 1532.1 requires construction workers to establish and implement a compliance program to ensure property handling and monitoring of lead-based paint exposure.

Although there are regulations and standards in place to protect against the accidental release of asbestos and lead-based paints and other hazardous materials during demolition, there could be potentially unknown sources of surface or subsurface hazardous materials on development sites that may be subject to a release during development. Impacts would be significant. Mitigation measure HAZ-1 would be required.

In the unlikely event of upset or accidental release, mandated protocols for reporting the release, notifying the public, and remediating the event (if determined necessary by regulatory agencies) are intended to reduce public risks. Specifically, the risks associated with the accidental release of hazardous materials would be managed through the implementation of AB 3205, California Hazardous Waste Control Law, California H&SC, CFC, and RCRA regulations.

HAZ-1 Applications for future development in the TCSP area, AEN, and Housing Element sites, wherein the City has determined a potential for impacts to known and unknown hazardous materials sites shall be required to identify potential conditions which require further regulatory oversight and demonstrate compliance consistent with the following prior to issuance of any permits.

A. Phase I Environmental Site Assessment (ESA) shall be completed in accordance with American Society of Testing and Materials Standards. If hazardous materials are identified requiring remediation, a Phase II ESA and remediation effort shall be conducted in conformance with federal, state, and local regulations.

B. If the Phase II ESA identifies the need for remediation, then the following shall occur prior to the issuance of grading permits.

1. The applicant shall retain a qualified environmental engineer to develop a soil and/or groundwater management plan to address the notification, monitoring, sampling, testing, handling, storage, and disposal of contaminated media or substances (soil, groundwater). The qualified environmental consultant shall monitor excavations and grading activities in accordance with the plan. The plans shall be approved by the City prior to development of the site.

2. The applicant shall submit documentation showing that contaminated soil and/or groundwater on proposed development parcels have been avoided or remediated to meet cleanup requirements established by appropriate local regulatory agencies (Regional Water Quality Control Board [RWQCB]/DTSC/DEHQ) based on the future planned land use of the specific area within the boundaries of the site (i.e., commercial, residential), and that the risk to human health of future occupants of these areas therefore has been reduced to below a level of significance.

3. The applicant shall obtain written authorization from the appropriate regulatory agency (RWQCB/DTSC/DEHQ) confirming the completion of remediation. A copy of the authorization shall be submitted to the City to confirm that all appropriate remediation has been completed and that the proposed development parcel has been cleaned up to the satisfaction of the regulatory agency. In the situation where previous contamination has occurred on a site that has a previously closed case or on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the DEHQ shall be notified of the proposed land use.

4. All cleanup activities shall be performed in accordance with all applicable federal, state, and local laws and regulations, and required permits shall be secured prior to commencement of construction to the satisfaction of the City and compliance with appliable regulatory agencies such as but not limited to the SMC.

2. Emissions Near a School

Threshold: 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?

Finding: Less than significant with mitigation measures. (Draft PEIR, pp. 4.9-16 through 4.9-19)

Explanation: **TCSP Area**

While facilities that emit hazardous air emissions or handle hazardous waste are not proposed by the project, specific future projects are not currently known. Therefore, accidental releases of hazardous materials could occur with demolition and construction activities within 0.25 mile of Rio Seco School and Santana High School as future projects are proposed. Impacts would be significant. Mitigation measure HAZ-1 would be required.

AEN

While facilities that emit hazardous air emissions or handle hazardous waste are not specifically proposed in the AEN, specific projects are not currently known. Accidental releases of hazardous materials could also occur with demolition and construction activities within 0.25 mile of Rio Seco School. Impacts would be significant and mitigation measure HAZ-1 would be required.

G. NOISE

3. Noise Standards

Threshold: Would the Project result in the 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?

Finding: Less than significant with mitigation. (Draft PEIR, pp. 4.12-13 through 4.12-22)

Explanation: Construction Noise

TCSP Area and AEN

Construction activities related to implementation of the proposed TCSP would not take place all at once; however, future development

and infrastructure activities associated with the proposed TCSP would have the potential to temporarily generate construction noise resulting in a short-term annoyance to nearby noise-sensitive land uses (NSLUs). More specifically, construction noise levels would have the potential to increase ambient noise levels by 5 dBA, depending on the location and construction equipment used. This is a significant construction noise impact in the TCSP area and AEN. Implementation of mitigation measure NOI-1 would reduce this impact to a less than significant level.

Housing Element Sites

For the Housing Element sites, NSLUs would be located at varying distances from future construction noise. Ambient noise levels vary at NSLUs depending on their proximity to existing noise sources (e.g., Magnolia Avenue). Two measurements were taken at locations to approximate existing noise levels at NSLUs, including near Housing Element Site 16A at 54.0 dBA and near Housing Element Site 20B at 54.5 dBA. Construction equipment would be traversing the entirety of each project site; construction noise may be closer or further from nearby NSLUs throughout a given construction day. For this analysis, the closest construction equipment to nearby NSLUs would be used at Housing Element Site 20B. Due to the size of the site and proximity to nearby residences, the average distance from the approximate center of the construction site to nearby residences to the south would be an average distance of 250 feet..

At 250 feet, noise levels would range from 58.5 dBA to 67.9 dBA, depending on the equipment in use. For the purposes of this analysis, a significant increase in noise would occur if construction noise levels exceed 5 dBA above ambient conditions at the time of project construction. At these distances, ambient noise levels ranging between 54.0 and 54.5 dBA may exceed 5 dBA at nearby residences, resulting in a significant construction noise impact at the Housing Element sites. Implementation of mitigation measure NOI-1 would reduce this impact to a less than significant level.

Operational Noise

Stationary Noise

TCSP Area and AEN

Similar to existing conditions, future development within the TCSP area would be subject to various stationary noise sources including noise from equipment and commercial activities. The SMC does not

provide numerical standards for noise generated by individual uses, but requires that heating, ventilation, and air conditioning (HVAC) uses do not create a noise disturbance at nearby occupied properties. In addition, noise generated during nighttime hours are not to exceed the average conversational level at a distance of 50 feet. Because there is no numerical standard set by the SMC, adequate reduction of future projects' noise levels is not guaranteed. Stationary operational noise is therefore considered significant for the TCSP area and AEN. Mitigation measure NOI-2 will reduce this impact to a less than significant level.

Housing Element Sites

For the Housing Element sites, specific planning data for the future HVAC systems and exact building site locations are not available; however, analysis using a typical to larger-sized residential condenser mounted on ground level pads provides a reasonable basis for analysis. HVAC units are anticipated to be located on project building rooftops or mounted on pads at distances greater than 25 feet from nearby property lines. Modeling assumed that the HVAC unit would be a Carrier 38HDR060 split system condenser. This unit typically generates a noise level of 56 dBA at a distance of 7 feet. If placed at a distance of 25 feet from nearby noise-sensitive land uses, a single HVAC would generate a noise level of approximately 45 dBA. Because the location of future HVAC units is unknown and there is no numerical standard set by the SMC, adequate reduction of future projects' noise levels is not guaranteed. Stationary operational noise is therefore considered significant for the Housing Element sites. Mitigation measure NOI-2 will reduce this impact to a less than significant level.

Construction Noise

TCSP Area, AEN, and Housing Element Sites

NOI-1 **Construction Noise Management Plan.** Noise levels from construction of future projects within the TCSP area shall not exceed 5 dBA above the maximum hourly average daytime baseline ambient noise levels as measured at nearby noise-sensitive land uses. To ensure the reduction of noise levels, a Construction Management Plan describing measures shall be included on future construction plans to ensure compliance with the aforementioned limits. The plans shall be prepared by future project applicants and submitted to the City for approval prior to issuance of a grading permit. The following measures may be included to reduce construction noise:

- Construction equipment to be properly outfitted and maintained with manufacturer-recommended noise-reduction devices.
- Diesel equipment to be operated with closed engine doors and equipped with factory-recommended mufflers.
- Mobile or fixed “package” equipment (e.g., arc-welders and air compressors) to be equipped with shrouds and noise control features that are readily available for that type of equipment.
- Electrically powered equipment to be used instead of pneumatic or internal combustion powered equipment, where feasible.
- Unnecessary idling of internal combustion engines (e.g., in excess of 5 minutes) to be prohibited.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas to be located as far as practicable from noise sensitive receptors.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- No project-related public address or music system shall be audible at any adjacent sensitive receptor.
- Temporary sound barriers or sound blankets may be installed between construction operations and adjacent noise-sensitive receptors. If barriers are to be used, the noise barrier should be constructed of a material with an STC 20 rating with no gaps or perforations and remain in place until the conclusion of demolition, grading, and construction activities.
- The project applicant shall notify residences within 100 feet of the project’s property line in writing within one week of any construction activity such as demolition, concrete sawing, asphalt removal, and/or heavy grading operations. The notification shall describe the activities anticipated, provide dates and hours, and provide contact information with a description of a complaint and response procedure.
- The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise

complaints. A clear appeal process for the affected resident shall be established prior to construction commencement to allow for resolution of noise problems that cannot be immediately solved by the site supervisor.

- On-site noise measurements may be used to monitor compliance of construction noise levels at nearby noise-sensitive land uses.

Stationary Operational Noise

TCSP Area, AEN, and Housing Element Sites

NOI-2 **Operational Noise Reduction**. Noise generated by standard operation of future projects within the TCSP area shall not exceed 60 dBA hourly average or the maximum hourly average ambient level if it already exceeds 60 dBA when measured at nearby noise-sensitive land uses such as residences, schools, daycares, hospitals, or hotels. To ensure that noise levels are reduced to adequate levels, a site-specific noise study may be requested by the City for individual future projects, as deemed necessary by the City's Planning Department. If noise levels are anticipated to exceed this limit, the City shall ensure that appropriate noise-attenuation features are installed by the project applicant to ensure noise levels are reduced.

Outdoor Performance Uses

TCSP Area and AEN

NOI-3 **Performance Areas Noise Studies**. When plans for future performance space are prepared, they shall be analyzed to ensure that noise levels generated by future events are reduced to 60 dBA hourly average or the maximum hourly average ambient level if it already exceeds 60 dBA at nearby noise-sensitive land uses such as residences, schools, daycares, hospitals, or hotels. For each proposed performance area or venue where noise levels could exceed this limit, a noise assessment shall be performed by a qualified noise consultant which analyzes anticipated noise-generating sources. The study shall assess any noise-amplifying equipment, directionality of amplified noise, positioning of bandstands, and potential crowd noise. The analysis shall also consider the anticipated event types. If modeled noise levels exceed the limits, design considerations shall be provided to ensure noise levels are reduced to 60 dBA or the maximum hourly average ambient noise level if it already exceeds 60 dBA. Noise attenuation features to be considered may include, but are not limited to, the following:

- Permanent barriers blocking the line-of-sight between the noise source and sensitive land use;
- Relocation of noise-generating equipment or areas where noise-generating activities may occur;
- Repositioning of noise-generating equipment facing away from sensitive uses; and
- Enclosing event spaces within structures, as feasible.

The results of the study shall be incorporated into design plans and be approved by the City Planning Department.

4. Groundborne Noise and Vibration

Threshold: Would the Project result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Finding: Less than significant with mitigation. (Draft PEIR, pp. 4.12-22 through 4.12-23)

Explanation: Construction Vibration

TCSP Area and AEN

Construction activities are known to generate excessive ground-borne vibration. Construction activities related to implementation of the proposed TCSP area and AEN would not take place all at once; however, future development accommodated by the proposed TCSP would have the potential to temporarily generate vibration resulting in a short-term effect on nearby vibration-sensitive land uses. Sources of vibration during the construction of future projects within the proposed TCSP area may include the potential for pile driving equipment and smaller equipment such as a vibratory roller. According to the Caltrans Transportation and Construction Vibration Guidance Manual, “strongly perceptible” ground-borne vibration is defined as equal to or exceeding 0.1 in/sec PPV. Construction activities within 200 feet and pile-driving within 600 feet of a vibration sensitive use would be potentially disruptive to vibration-sensitive operations (Caltrans 2013). Impacts from future projects within the TCSP area, excluding the Housing Element sites, are not known and, therefore, are considered significant. Implementation of mitigation measure NOI-4 will reduce this impact to a less than significant level.

TCSP Area and AEN

NOI-4 **Construction Vibration Analysis.** A site-specific vibration study shall be prepared for proposed land uses that have the potential for construction-related vibration impacts. Construction activities within 200 feet and pile-driving within 600 feet of a vibration-sensitive use could be potentially disruptive to vibration-sensitive operations. Proposed development shall implement recommended measures within the study to ensure that projects reduce construction-related vibration impacts to below 0.1 in/sec PPV at vibration-sensitive uses. Measures to reduce noise may include, but are not limited to, placing vibratory rollers in static mode within set distances of vibration-sensitive structures, prohibiting vibratory construction operations during specific hours, and limiting pile driving operations.

H. TRIBAL CULTURAL RESOURCES

1. Tribal Cultural Resources

Threshold: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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 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)?

Finding: Less than significant with mitigation. (Draft PEIR, pp. 4.17-5 through 4.17-6)

Explanation: **TCSP Area and AEN**

While the TCSP and AEN do not specifically propose alteration of a known tribal cultural resource, it can be assumed that future development within the TCSP area could have the potential to directly or indirectly impact resources through such activities. Because site-specific details of future projects are not known at this program-level of analysis, impacts to tribal cultural resources would be considered potentially significant. The implementation of mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce these impacts to less than significant.

Housing Element Sites

Although no specific tribal cultural resources have been identified in the Housing Element sites, the presence of historical resources throughout the TCSP area suggests that there is a potential for encountering previously unidentified tribal cultural resources. Future development of sites 16A, 16B, 20A, and 20B therefore has the potential to cause substantial adverse changes to tribal cultural resources, as described in Section 4.5.5.1. The implementation of mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce these impacts to a less than significant level.

2. Significant Resource per PRC Section 5024.1

Threshold: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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 isa 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 PRC Section 5024.1? In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Finding: Less than significant with mitigation. (Draft PEIR, pp. 4.17-6 through 4.17-7)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

As previously described, the NAHC Sacred Lands File search was positive for the presence of sacred lands within the project vicinity. In addition, the San Pasqual Band of Mission Indians and the Viejas Band of Kumeyaay Indians requested government-to-government consultation. The Barona Band of Mission Indians requested to receive the results of the cultural resources study and be kept appraised of any updates. Finally, the Jamul Indian Village deferred to closer tribes. The Barona Band of Mission Indians noted that the San Diego River is a known use area and has the potential for intact buried cultural deposits. Through formal consultation under SB 18 and AB 52, no formal tribal cultural resources were specifically identified. However, given the presence of sacred lands in the project vicinity and the potential for tribal cultural resources to underly the project site, ground-disturbing activities associated with project construction have the potential to cause a substantial adverse change

in the significance of tribal cultural resources. The implementation of mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4 will reduce these impacts to less than significant.

I. UTILITIES AND SERVICE SYSTEMS

1. Utility Infrastructure

Threshold: 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?

Finding: Less than significant with mitigation. (Draft PEIR, pp. 4.18-13 through 4.18-15)

Explanation: **TCSP Area, AEN, and Housing Element Sites**

Water

Development anticipated for the proposed project would occur within areas of the City that are already served by existing water utility infrastructure. Water service in the TCSP area would continue to be provided by PDMWD. The PDMWD's potable water system in the TCSP area would continue to be entirely gravity fed and supplied by water main pipelines. A large distribution pipeline from the El Capitan Reservoir is also located beneath Mission Gorge Road. While future projects within the TCSP area would require connection to existing water pipelines, localized water utility infrastructure improvements and relocations would be evaluated upon submittal of project specific development plans. All future project applications, whether discretionary or ministerial, would be required to comply with relevant City regulations and adhere to the mitigation framework presented in this EIR, including mitigation measures BIO-1 through BIO-6, CUL-1 through CUL-4, GEO-1, HAZ-1, and NOI-1, NOI-2, and NOI-4, which would ensure that any physical impacts associated with construction of pipeline connections to existing water infrastructure would be addressed as part of the City review for each individual project. Additionally, future projects would be required to comply with General Plan policies including Land Use Element Policy 3.6, which requires the review of development projects to ensure that all necessary utilities are available to serve the project.

Wastewater

Development anticipated for the proposed project would occur within areas of the City that are already served by existing wastewater utility infrastructure. The PDMWD would also continue to provide wastewater collection and disposal to the TCSP area. There is a network of existing sewer pipelines throughout the TCSP area, including larger pipelines up to 27 inches in diameter near the intersection of Town Center Parkway and Cuyamaca Street. The adopted five-year budget for PDMWD identifies two capital projects within the TCSP area: the Mission Gorge Sewer and Sewer Lifts Station Rehabilitation. Both projects are planned to be implemented during Fiscal Years 2026 through 2027 and would increase sewage capacity and provide maintenance to the sewer system. While future projects within the TCSP area, AEN, and Housing Element sites would require localized connection to existing wastewater pipelines, wastewater utility infrastructure improvements and relocations would be evaluated upon submittal of project specific development plans. All future project applications, whether discretionary or ministerial, would be required to comply with relevant City regulations and adhere to the mitigation framework presented in this EIR, including mitigation measures BIO-1 through BIO-6, CUL-1 through CUL-4, GEO-1, HAZ-1, and NOI-1, NOI-2, and NOI-4, which would ensure that any physical impacts associated with construction of pipeline connections to existing wastewater infrastructure would be addressed as part of the City review for each individual project. Additionally, future projects would be required to comply with General Plan policies including Land Use Element Policy 3.6, which requires the review of development projects to ensure that all necessary utilities are available to serve the project.

Stormwater

Development anticipated for the proposed project would occur within areas of the City that are already served by existing stormwater infrastructure. Existing stormwater infrastructure would be able to accommodate post project stormwater flows considering existing requirements for detention and on-site infiltration. While future projects within the TCSP area, AEN, and Housing Element sites would require connection to existing stormwater facilities, localized stormwater infrastructure would be evaluated upon submittal of project specific development plans. All future project applications, whether discretionary or ministerial, would be required to comply with relevant City regulations and adhere to the mitigation framework presented in this EIR, including mitigation measures BIO-1 through BIO-6, CUL-1 through CUL-4, GEO-1, HAZ-1, and NOI-1, NOI-2, and

NOI-4, which would ensure that any physical impacts associated with construction of pipeline connections to existing wastewater infrastructure would be addressed as part of the City review for each individual project. Additionally, future projects would be required to comply with General Plan policies including Land Use Element Policy 3.6, which requires the review of development projects to ensure that all necessary utilities are available to serve the project.

It is further noted that future projects would be required to design all on-site storm water facilities to comply with the City's BMP Design Manual. As discussed in greater detail in Section 4.10 of this EIR, adherence to the BMP Design Manual ensures new development and redevelopment provide adequate storm water facilities that are compatible with existing City systems and conform to all performance standards presented in the MS4 permit. Physical impacts of all utility improvements would be addressed as part of the future project-specific applications and appropriate mitigation for impacts would be applied consistent with this PEIR.

Electric Power, Natural Gas, and Telecommunications

Development anticipated for the proposed project would occur within areas of the City that are already served by existing electrical, natural gas, and telecommunications utility infrastructure. The proposed TCSP states that AT&T, Cox Communications, and Crown Castle would continue to provide telecommunications services in the TCSP area. SDG&E would continue to provide electricity and natural gas services to the TCSP area, and existing transmission and distribution facilities in the TCSP area would remain. Additional Underground Utility Districts, or areas where utilities such as poles, wires, or other overhead structures must be placed below ground for aesthetic and safety purposes, may be established during project buildout, as determined by the City Council. While future projects within the TCSP area, AEN, and Housing Element sites would require connection to these existing facilities, localized utility infrastructure improvements and relocations would be evaluated upon submittal of project specific development plans. All future project applications, whether discretionary or ministerial, would be required to comply with relevant City regulations and adhere to the mitigation framework presented in this EIR, including mitigation measures BIO-1 through BIO-6, CUL-1 through CUL-4, GEO-1, HAZ-1, and NOI-1, NOI-2, and NOI-4, which would ensure that any physical impacts associated with construction of connections to existing electrical, natural gas, and telecommunications utility infrastructure would be addressed as part of the City review for each individual project. Additionally, future projects would be required to comply with General Plan policies

including Land Use Element Policy 3.6, which requires the review of development projects to ensure that all necessary utilities are available to serve the project.

SECTION IV.
IMPACTS THAN CANNOT BE FULLY MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

The City Council hereby finds that, despite the incorporation of Mitigation Measures identified in the EIR and in these Findings, the following environmental impacts cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein:

A. AIR QUALITY

1. Cumulative Net Increases of Criteria Pollutants

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

Finding: Significant and unavoidable. The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Mitigation Measure AQ-1 is feasible and has been adopted. However, no additional feasible mitigation is available for operational emissions, which would remain significant and unavoidable. (Draft PEIR, pp. 4.2-15 through 4.2-19)

Explanation: **TCSP Area and AEN**

The long-term emissions of criteria pollutants and precursors generation by full buildout of the TCSP area and AEN would result in exceedances to SDAPCD's daily screening thresholds for VOC, CO, PM10, and PM2.5; impacts would be significant. Electric lawn equipment including lawn mowers, leaf blowers, and chain saws are available. When electric landscape equipment is used in place of conventional gas-powered equipment, direct emissions from fossil fuel combustion are eliminated. Implementation of Measure AQ–1 would result in an average reduction of area source related VOC emissions by 20 percent (from 114.3 pounds per day to 91.5 pounds per day) and the virtual elimination of CO and particulate matter emissions. With implementation of mitigation measure MM-AQ–1, VOC, CO, PM_{10}, $PM_{2.5}$ emissions would be reduced, but remain above their respective threshold.

Impacts related to operational emissions from full buildout of the TCSP would remain significant and unavoidable. No additional feasible mitigation measures have been identified that would reduce these impacts to a less than significant level at the program-level.

TCSP Area and AEN

AQ-1 Use of electrically powered landscape equipment. Electric receptacles/outlets shall be installed at the exterior of all single-family units, all multi-family buildings (including those with affordable units), and all common area buildings, so that homeowners and landscape contractors hired by the homeowners' association may utilize electrically powered lawnmowers, leaf blowers, and chainsaws. Project plans shall include: (1) all necessary receptacles/outlets; and (2) a note that states "All landscape maintenance contracts provided by the applicable homeowners association must require that landscape contractors use electrically powered lawn mowers, leaf blowers, and chain saws." City staff must verify both requirements prior to approval of the final plans.

B. HAZARDS AND HAZARDOUS MATERIALS

1. Airport Hazards

Threshold: For a project located within an Airport Land Use Compatibility Plan (ALUCP) or, where such plan has not been adopted, within two miles of a public airport or public use airport, or a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Finding: Significant and unavoidable. The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. No feasible mitigation is available for hazards related to ALUCP compatibility, which would remain significant and unavoidable. (Draft PEIR, pp. 4.9-20 through 4.9-24;Final PEIR, p. 2-10)

Explanation: **TCSP Area**

As shown on Figure 4.9-2b, the northern half of the TCSP area is located in Review Area 2 for both Gillespie Field and Marine Corps Air Station (MCAS) Miramar. South of the San Diego River, the TCSP area is located in the Review Area 1 for Gillespie Field. The southwestern tip of the TCSP area is in the 60 to 65 decibel (dB) noise contour for Gillespie Field. Portions of the TCSP area south of the

San Diego River are also within Safety Zone 3, 4, and 6 for Gillespie Field.

In Safety Zone 3 for Gillespie Field, new residential development at a density greater than 16 du/ac is “incompatible,” and new residential development between 4 and 16 du/ac is “conditionally compatible” and subject to the requirements stated in the ALUCP. In Safety Zone 4 for Gillespie Field, new residential development at a density greater than 20 du/ac is “incompatible,” and new residential development between 4 and 16 du/ac is “conditionally compatible” and subject to the requirements stated in the ALUCP. New residential development is considered compatible in Safety Zone 6.

The ALUCP addresses four types of compatibility factors including noise, safety, airspace protection, and overflight. Impacts related to consistency with airport land use plans are discussed in Section 4.11 of this EIR and noise compatibility issues related to operations at Gillespie Field are discussed in Section 4.12 of this EIR.

With specific respect to air safety issues, according to the Gillespie Field and MCAS Miramar ALUCPs (San Diego County Regional Airport Authority 2010 and 2011),

- Review Area 1 consists of locations where noise and safety concerns may necessitate limitations on the types of land uses actions. Specifically, Review Area 1 encompasses locations exposed to aircraft noise levels of 60 dB CNEL or greater and areas subject to the safety zones depicted on Figure 4.9-2b.

- Review Area 2 consists of locations beyond Review Area 1 but within the airspace and/or overflight notification areas depicted on the maps in the respective ALUCPs. Limits on the heights of structures, particularly in areas of high terrain, are the only restriction on land uses within Review Area 2. For projects within Review Area 2, the recordation of overflight notification documents is also required.

All future development within the Gillespie Field Review Areas 1 and 2 would be reviewed to ensure that design features are incorporated into the site plan to address identified aircraft safety and noise hazards, consistent with General Plan Policy 7.1. Residential development proposed in the TCSP area would be considered compatible with Safety Zone 6.

Objective Design Standard J, *Aviation Land Use Compatibility*, in the proposed TCSP states that development proposals within Review Area 1 shall be routed to the Federal Aviation Administration for a determination of no hazard to air navigation and to the ALUC for consultation as part of the site-specific development review. The proposed TCSP designates Office Commercial in Safety Zone 3, which is conditionally compatible and must comply with the conditions specified in Table III-2 of the ALUCP. The proposed TCSP designates Residential (TC-R-14, TC-R-22, and TC-R-30), Entertainment Commercial, Office Commercial, Open Space, and Institutional land uses in Safety Zone 4, consistent with the densities, intensities, and heights allowed by existing zoning, the 2021-2029 Housing Element, and state density bonus law. Residential uses with densities higher than 20 du/ac (TC-R-22, TC-R-30, and potentially TC-R-14, depending on final buildout) are incompatible in Safety Zone 4, and residential uses within Safety Zone 4 could allow heights up to 55 feet, or to a maximum of 85 feet, with density bonus, consistent with existing zoning and with state density bonus law. Indoor and outdoor assembly uses characteristic of the Entertainment Commercial designation are conditionally compatible in Safety Zone 4 if the capacity involves 50 to 999 people and incompatible with a capacity of more than 1,000 people. Office Commercial is conditionally compatible in Safety Zone 4. Open space is compatible in Safety Zone 4. Institutional land uses are conditionally compatible in Safety Zone 4. Safety Zone 6 includes Office Commercial, Commercial, Entertainment Commercial, Floodway/Open Space, Open Space, and Residential (TC-R-22 and TC-R-30) land uses, all of which are compatible except indoor and outdoor assembly uses of over 1,000 people, which is conditionally compatible and subject to the requirements stated in Table III-2.

Since no development is proposed at this time, it is unknown whether the development of the TCSP would create an inconsistency with the ALUCP. As such, on January 9, 2025, ALUC found the TCSP project conditionally consistent with the ALUCP and imposed project conditions that future proposed development within the project area must comply with the residential dwelling units or people per acre as specified by the applicable safety zone. Future projects found to be conditionally compatible or potentially incompatible with the Gillespie Field ALUCP would require consultation with the ALUC. As discussed in Section 4.11 of this EIR, it is possible that during this consultation process individual projects could be found incompatible with the Gillespie Field ALUCP due to allowable densities exceeding ALUCP standards. Further, after this ALUC consultation process is

performed, the City Council could choose to overrule the ALUCP density limitations in favor of a specific development proposal.

Even if the City were to overrule the ALUCP density limitations, individual projects, as applicable would be required to obtain a FAA determination of No Hazard to Air Navigation and/or implement FAA conditions that would allow the FAA determination of No Hazard to Air Navigation consistent with TCSP Objective Design Standard J and the requirements for ministerial projects described in Section 3.4.2 of this EIR. While conformance with applicable City policies, consideration of ALUCP design considerations for development within airport safety zones, and compliance with any applicable FAA conditions would address aircraft hazards within the TCSP area to a degree, inconsistencies with the development densities allowed by the TCSP in Gillespie Field ALUCP Safety Zones 3 and 4 could be considered "incompatible" by the ALUC and a safety hazard associated with these densities would occur. Therefore, under CEQA, impacts associated with development in Gillespie Field ALUCP Safety Zones 3 and 4 would result in significant and unavoidable impacts associated with the TCSP.

AEN

The northern half of the AEN is located in Review Area 2 for both Gillespie Field and MCAS Miramar. South of the San Diego River, the AEN is located in the Review Area 1 for Gillespie Field. The central portion of the AEN is within Safety Zone 4 and 6 for Gillespie Field, and a small portion south of the Las Colinas is in Safety Zone 3. The AEN includes Office Commercial land use in Safety Zone 3, which is conditionally compatible and must comply with the conditions specified in Table III-2 of the ALUCP. The AEN includes Residential (TC-R-14, TC-R-22, and TC-R-30), Entertainment Commercial, Office Commercial, Open Space, and Institutional land uses in Safety Zone 4. Residential uses with densities higher than 20 du/ac (TC-R-22, TC-R-30, and potentially TC-R-14, depending on final buildout) are incompatible in Safety Zone 4. Indoor and outdoor assembly uses characteristic of the Entertainment Commercial designation are conditionally compatible in Safety Zone 4 if the capacity involves 50 to 999 people and incompatible with a capacity of more than 1,000 people. Office Commercial is conditionally compatible in Safety Zone 4. Open space is compatible in Safety Zone 4. Institutional land uses are conditionally compatible in Safety Zone 4. Safety Zone 6 includes Office Commercial, Entertainment Commercial, Floodway/Open Space, Open Space, and Residential (TC-R-22 and TC-R-30) land uses, all of which are compatible except indoor and

outdoor assembly uses of over 1,000 people, which are conditionally compatible and subject to the requirements stated in Table III-2.

Since no development is proposed at this time, it is unknown whether the development of the TCSP would create an inconsistency with the ALUCP. As such, on January 9, 2025, ALUC found the TCSP project conditionally consistent with the ALUCP and imposed project conditions that future proposed development within the project area must comply with the residential dwelling units or people per acre as specified by the applicable safety zone. While conformance with applicable City policies, consideration of ALUCP design considerations for development within airport safety zones, and compliance with any applicable FAA conditions would address aircraft hazards within the AEN area to a degree, inconsistencies with the development densities allowed by the TCSP in Gillespie Field ALUCP Safety Zones 3 and 4 could be considered “incompatible” by the ALUC and a safety hazard associated with these densities would occur. Therefore, impacts associated with development in Gillespie Field ALUCP Safety Zones 3 and 4 would result in significant and unavoidable impacts.

Housing Element Sites

Since no development is proposed at this time in the Housing Element sites, it is unknown whether the development of the Project would create an inconsistency with the ALUCP. However, since the project could allow development at densities exceeding ALUCP Safety Zone limitations, impacts under CEQA would be significant and unavoidable as discussed below. Even with the TCSP requirement for development proposals within Review Area 1 to be routed to the Federal Aviation Administration for a determination of no hazard to air navigation and to the ALUC for consultation as part of the site-specific development review, significant and unavoidable impacts could occur.

Site 16A

Site 16A is located in Review Area 1 for the Gillespie Field and Review Area 2 for MCAS Miramar. Site 16A is also located partially within Safety Zones 4 and 6 for Gillespie Field. Site 16A proposes a density of 30 to 36 du/ac, which is incompatible with Safety Zone 4. Site 16A would be compatible with Safety Zone 6. Conformance with applicable City policies, ALUCP design considerations applicable to development with airport safety zones, and compliance with applicable FAA conditions would be required; however, future development within the Gillespie Field Safety Zone 4 would result in

a safety hazard for people residing or working in the project area. Impacts associated with airport hazards would be significant and unavoidable under CEQA.

Site 16B

Site 16B is located in Review Area 1 and Safety Zone 4 for the Gillespie Field. Site 16B proposes a density of 14 to 22 du/ac. If the final buildout of Site 16B has a density higher than 20 du/ac, Site 16B would be incompatible with Safety Zone 4; otherwise, it would be conditionally compatible. Conformance with applicable City policies, ALUCP design considerations applicable to development with airport safety zones, and compliance with applicable FAA conditions would be required; however, future development within the AEN within Gillespie Field Safety Zone 4 would result in a safety hazard for people residing or working in the project area. Impacts associated with airport hazards would be significant and unavoidable under CEQA.

Site 20A

Site 20A is located in Review Area 1 and partially within Safety Zones 4 and 6 for the Gillespie Field. Site 20A proposes a density of 22 to 30 du/ac, which is incompatible with Safety Zone 4. Site 20A would be compatible with Safety Zone 6. Conformance with applicable City policies, ALUCP design considerations applicable to development with airport safety zones, and compliance with applicable FAA conditions would be required; however, future development within the AEN within Gillespie Field Safety Zone 4 would result in a safety hazard for people residing or working in the project area. Impacts associated with airport hazards would be significant and unavoidable under CEQA.

Site 20B

Site 20B is located in Review Area 1 and partially within Safety Zones 4 and 6 for the Gillespie Field. Site 20B proposes a density of 30 to 36 du/ac, which is incompatible with Safety Zone 4. Site 20B would be compatible with Safety Zone 6. Conformance with applicable City policies, ALUCP design considerations applicable to development with airport safety zones, and compliance with applicable FAA conditions would be required; however, future development within the AEN within Gillespie Field Safety Zone 4 would result in a safety hazard for people residing or working in the project area. Impacts associated with airport hazards would be significant and unavoidable under CEQA.

C. LAND USE AND PLANNING

1. Conflicts With Plans and Policies

Threshold: 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 impact?

Finding: Significant and unavoidable. The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. No feasible mitigation is available for impacts related to ALUCP incompatibility, which would remain significant and unavoidable. (Draft PEIR, pp. 4.11-8 through 4.11-10; Final PEIR p. 2-10)

Explanation: **TCSP Area and AEN**

The project involves updates to the TCSP, including an expansion of the overall boundaries and updated development standards to facilitate planned development throughout the TCSP area and AEN and does not propose any specific development. The guiding land use document for the TCSP area and AEN is the TCSP, which implements the City's General Plan by establishing a long-term vision for the TCSP area and providing tailored land use and development standards applicable to future development and improvements within the TCSP area and AEN.

The proposed TCSP is a specific plan and would comply with California Government Code Sections 65450 through 65457 which require that a specific plan be consistent with the adopted General Plan for the jurisdiction in which the specific plan area is located. Specific plans adopted by ordinance become the applicable zoning that provide specific direction to the type and intensity of uses permitted and may also define design expectations and standards. The proposed update to the TCSP is a regulatory document that would be adopted by ordinance. The TCSP notes that in any instance where the TCSP conflicts with the requirements of the SMC, the TCSP provisions shall take precedence. Where the TCSP is silent on a topic, the requirements of Title 13 of the SMC (Zoning Ordinance) would remain in effect. The City's 2021-2029 Housing Element and current Zoning Ordinance allow up to 36 du/ac, and none of the residential densities established by the TCSP would exceed 36 du/ac. The proposed modifications to the TCSP would become part of the City's General Plan and Zoning Ordinance and would not conflict with applicable state and local land use requirements. Further, the project

would not conflict with Measure N because there are no local legislative actions required for the project that would result in increased densities.

Regional planning documents maintained by SANDAG are related to GHG reduction through greater emphasis on use of transit and less need to rely on private vehicle travel. The Regional Plan: San Diego Forward, adopted in 2021, further identified GHG reduction strategies through transportation and land use planning as follows: connect communities through multi-modal transportation choices; and increase a variety of housing options in proximity to existing and planned transit. The TCSP area includes the eastern terminus of the Copper Line trolley line at the Santee Trolley Station in the AEN and identifies this area and surrounding uses for Trolley Commercial uses as part of a transit hub to serve residents and workers in the community and adjacent communities, including visitors that arrive to the TCSP area via the trolley. Also, one of the key elements of the TCSP is to incorporate roadway facilities that provide multimodal connectivity throughout the AEN, to allow the movement of people walking, bicycling, and riding transit in the area. The proposed TCSP is consistent with existing adopted land uses, promotes multimodal activity, and would not conflict with regional planning efforts aimed at reducing GHGs or mitigating other environmental effects.

Other local planning documents that pertain to the TCSP area and AEN include the County MSCP and MCAS Miramar and Gillespie Field ALUCPs. The County MSCP was adopted to support local conservation efforts of native habitat and wildlife. As detailed in EIR Section 4.4, the TCSP area and AEN have adequate species coverage and suitable habitats would continue to be protected under the MSCP and the project would not result in conflicts with the MSCP. The MCAS Miramar and Gillespie Field ALUCPs were adopted to address airspace safety and noise issues as they relate to surrounding areas. As detailed in EIR Section 4.9, future development within the TSCP area and AEN would be subject to notification and consultation with the ALUC at the time specific development proposals are submitted for City review. Conflicts with local planning documents are not anticipated and future development proposals within the TCSP area and AEN would still be subject to review for consistency with the City's General Plan and SMC; however, it is possible that future development plans within the TCSP area and AEN within Gillespie Field Safety Zones 3 and 4 would not be entirely compatible with the ALUCPs due to residential density limitations. While no development is proposed at this time and ALUC found the TCSP project conditionally compatible on January 9, 2025. When

development proposals do come forth, they would be required to complete consultation with the ALUC and depending on the ultimate density of the proposal, future development within could be found incompatible with the ALUCP. Therefore, at this level of program review, a significant impact under CEQA would occur with respect to consistency with ALUCPs.

Housing Element Sites

The Housing Element sites are within areas identified for residential and non-residential development. The project includes the development of Housing Element sites 16A, 16B, 20A, and 20B with their maximum development potential identified in the City's current Housing Element and with the state density bonus law for affordable housing and includes some non-residential development. Development within these sites would be consistent with existing zoning and state density bonus law, which could allow heights up to 55 feet, or to a maximum of 85 feet with density bonus. Housing Element sites 16A and 16B are near the Santee Trolley Station and Housing Element site 20A and 20B are along Magnolia Avenue which does include bus services.

City General Plan Land Use Element Policy 2.2 states that the City should encourage the development of higher density residential developments in areas close to the multi-modal transit station and along major road corridors where transit and other convenience services are available.

The Housing Element sites are located within the center of the City in proximity to existing major roads and transit and provide greater opportunity for residential use of multi-modal and transit options. Regional planning efforts by SANDAG to reduce GHG emissions would also be supported by the proposed development at the Housing Element sites.

As discussed in EIR Section 4.9, the Housing Element sites are within Gillespie Field's Review Area 2 and Safety Zones 3, 4 and 6 and Housing Element Site 16A is also within MCAS Miramar's Review Area 2. Aircraft safety is addressed in the TCSP for the Housing Element sites and indicates that future projects at the Housing Element sites shall incorporate design features to address identified aircraft safety and noise hazards, consistent with General Plan Safety Element Policy 7.1. Airport noise for Housing Element sites 20A and 20B are required to prepare a noise technical analysis by a qualified professional that demonstrates either noise levels would not exceed the City's General Plan Noise Element compatibility guidelines, or that

noise levels which already exceed the levels considered compatible for that use are not increased by 3 dB or more.

The City is responsible for submitting the Application for a Consistency Determination to the Airport Authority. Airport staff would review and make recommendations to the ALUC as to the appropriate determination. The ALUC must act upon an application for a determination of consistency with an ALUCP within 60 days of the ALUC deeming such application complete. The City may overrule an ALUC determination of inconsistency by a two-thirds vote of the City Council if it can make certain findings and provide a 45-day notice of the same to the ALUC and the California Department of Transportation per Public Utilities Code Section 21676.5(a). Where possible conflict between the residential density provisions mandated by state law and Airport Safety Zones are identified with a specific land use proposal, the ALUCP density limitations shall apply unless overridden by the City Council. Since this process is not unique to the City, it does not constitute a distinct or unusual constraint. Notwithstanding the potential overrule of ALUCP density limitations, all future individual projects, including ministerial projects, would be required to obtain a FAA determination of No Hazard to Air Navigation and/or implement FAA conditions that would allow the FAA determination of No Hazard to Air Navigation consistent with TCSP Objective Design Standard J and the requirements for ministerial projects described in Section 3.4.2 of this EIR. Impacts associated with conflicts with local land use plans would be less than significant, except with respect to compatible density within Gillespie Field Safety Zones 3 and 4. While no development is proposed at this time and ALUC found the TCSP project conditionally compatible on January 9, 2025, the potential for future development within the Housing Element sites to exceed the density limits for the corresponding airport safety zone remains, resulting in a significant and unavoidable impact under CEQA.

D. NOISE

1. Noise Standards

Threshold: Would the Project result in the 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?

Finding: Significant and unavoidable. The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR

infeasible. Mitigation Measure NOI-3 is feasible and has been adopted. However, no additional feasible mitigation is available for noise impacts related to outdoor performances, which would remain significant and unavoidable. (Draft PEIR, pp. 4.12-13 through 4.12-22)

Explanation: *Outdoor Performances*

TCSP Area and AEN

The AEN may include outdoor events and gatherings of people for artistic, cinematic, theatrical, musical, sporting, cultural, education or civic purposes. Design details for outdoor venues, designs, and associated events are not known at this stage; however, potential locations could include the Civic Center Site, Karl Strauss Site, Polo Barn site, Trolley Square Site, Vacant Site (Parcel 6), and the Sportsplex/Town Center Community Park (RRM 2024b). Noise levels associated with gathering areas may therefore vary significantly depending on the type of event, use of amplified equipment, and size of crowds.

Similar to stationary operational noise, noise associated with outdoor performances would be regulated by the SMC, which does not provide numerical thresholds for noise generation. For the purposes of this analysis, conversational noise levels and noise disturbances are considered noise levels that exceed 60 dBA at nearby NSLUs. Because no set plans are available for outdoor performance areas, including site layouts or locations of potential noise-amplification equipment, impacts are considered significant for the TCSP area and AEN. Mitigation measure NOI-3 would be required for future event spaces; however, outdoor events and entertainment activities in proposed commercial and mixed use spaces may result in noise levels in exceedance of 60 dBA at nearby NSLUs and impacts would remain significant and unavoidable.

E. TRANSPORTATION

1. Vehicle Miles Traveled

Threshold: Would the Project conflict or be inconsistent with CEQA Guidelines sections 15064.3, subdivision (b)?

Finding: Significant and unavoidable. The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Mitigation Measure TRA-1 is feasible and has been

adopted. However, no additional feasible mitigation is available for VMT impacts, which would remain significant and unavoidable. (Draft PEIR, pp. 4.16-15 through 4.16-19)

Explanation: **TCSP Area and Housing Element Sites 20A and 20B**

Areas of the TCSP area that are not within a TPA and do not meet other screening VMT criteria, such as Housing Element Sites 20A and 20B, the Park Center Residential Neighborhood and the new residential on the west side of Town Center Commercial Neighborhood, would result in a VMT impact. Implementation of MM-TRA-1 as part of future projects reviews would potentially reduce VMT per capita. However, the effectiveness of VMT reducing measures is context-sensitive and would vary depending on project details, such as the location, access to transit, etc. At a program level of review with no specific development proposals available for review, it is not guaranteed that each individual project would be able to fully mitigate the potential impacts. While MM-TRA-1 would minimize VMT impacts associated with future development, impacts would not be fully mitigated. Therefore, impacts associated with VMT would remain significant and unavoidable.

TCSP Area, AEN, and Housing Element Sites 20A and 20B (excluding Housing Element Sites 16A and 16B)

TRA-1 For development projects located outside of a TPA that both: do not meet other VMT screening criteria and exceed VMT thresholds established by the City, the City shall require implementation of applicable Mobility Element Policies that would support VMT reductions for individual projects. Specifically, the City shall require that future projects be compliant with Mobility Element Policies 9.1 through 9.5, which encourage the use of Transportation Demand Management (TDM) strategies, such as ride sharing programs, flexible work schedule programs, and incentives for employees to use transit. Additionally, alternative transportation modes, such as walking, cycling and public transit are encouraged to reduce peak hour vehicular trips, save energy, and improve air quality. Sample TDM measures that may be applied at the project level are provided below:

- Increase mixed-use development
- Increase transit accessibility
- Provide pedestrian network improvement along project frontage
- Provide bicycle network improvement along project frontage

- Provide bicycle parking and bike lockers
- Implement subsidized or discounted transit passes
- Provide rider-sharing programs
- Implement commute trip reduction marketing
- Implement school pool program
- Implement bike-sharing or micro mobility program
- Provide local shuttle to connect visitors to different attractions throughout the City

Additional measures can be found in the California Air Pollution Control Officers Association Quantifying Greenhouse Gas Mitigation Measures report (http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf). Mitigation measures should be consistent with the City's Active Transportation Plan.

SECTION V.
CUMULATIVE IMPACTS

Regarding the Project's potential to result in cumulative impacts, the City hereby finds as follows:

A. AESTHETICS

The study area for the assessment of cumulative visual impacts includes the entirety of the City as well as parts of the surrounding cities within viewshed of the TCSP area and AEN including the City of El Cajon to the south and southwest, the City of San Diego to the west and northwest, and the County of San Diego to the east and northeast. The project is the update to the TCSP that is part of the City's General Plan. Future development within the TCSP area, AEN, and Housing Element sites could have a cumulative impact on visual resources due to changes in the existing visual quality and aesthetics resulting from incremental increases in density and urbanization. This growth could gradually alter the visual nature of the study area. The following is a summary of the project's contribution to cumulative aesthetic impacts.

The most noticeable visual changes would occur with development of vacant and underutilized sites within the TCSP area that is surrounded by residential and commercial development. Development of the TCSP area, AEN, and Housing Element sites would be consistent with the visual quality and character of surrounding development based on application of required design review and consistency with SMC standards, including those provided in the TCSP. Additionally, some of the underutilized sites consist of aging structures with poor visual quality, and redevelopment of these structures would result in new residential structures developed consistent with the visual requirements of the SMC. Furthermore, development of vacant and underutilized sites within the TCSP area, AEN, and Housing Element sites would be required to adhere to the land use plan in the TCSP.

Regarding public views, the TCSP area involves a majority of the central portion of the City. Development within the TCSP area would constitute infill development resulting in development consistent with surrounding urbanization that would not affect existing views. However, some larger vacant sites located near the San Diego River could affect views. Future development would be required to adhere to relevant portions of the SMC including Chapter 13.08, et seq., which establishes the City's Development review procedures, including the supplemental development regulations of the proposed TCSP. The Development review process would ensure that future development would not degrade scenic vistas and views and, therefore, there would be no substantial cumulative obstruction of public views.

Regarding light pollution, development with the TCSP area, AEN, and Housing Element sites would be required to comply with the SMC standards related to light and glare (Chapter 13.08.070(G)), which requires that outdoor lighting be directed away from adjacent properties and set in a way to avoid any detriment to the surrounding area. Additionally, the City's General Plan Community Enhancement Element includes the

standard for lighting and signage to minimize spillover of lighting through use of directional, cut-off, and non-glare fixtures.

Overall, future development in the TCSP area, AEN, and Housing Element sites, combined with development in the surrounding cumulative study areas, would not result in a cumulatively significant visual impact due to the mostly urbanized nature of the cumulative study area. Adherence to regulatory requirements including Development review consistent with SMC Chapter 13.08 implementation and proposed TCSP development regulations would ensure that future development would not substantially degrade scenic resources. Thus, the project's incremental contribution to visual impacts would not be cumulatively considerable and cumulative visual impacts would be less than significant. (Draft PEIR, pp. 7-2 through 7-3)

B. AGRICULTURE AND FORESTRY RESOURCES

The study area for the assessment of cumulative agriculture and forestry resources impacts is limited to the TCSP area as areas surrounding the TCSP are generally urbanized and while much of the City and surrounding areas were once used for agricultural production and grazing, there are no active agricultural uses or operations in the TCSP area or surrounding areas. As the majority of the TCSP area, AEN, and Housing Element sites have been part of the TCSP since its adoption in 1986, the project site has been identified for urban development and not been used for agricultural use nor has it contained forestry resources.

Project approval would result in the expansion of the boundaries of the overall TCSP area and updated development standards, as well as conceptual development plans and Objective Design Standards for Housing Element sites. As noted in Table 4.2-1 in EIR Section 4.2, portions of the TCSP area, AEN, and Housing Element Sites 16A and 16B are designated as Farmland of Local Importance; however, these areas are not in active agricultural use and are identified for residential and non-residential development in the existing and proposed TCSP. As there are no active or planned agricultural uses or forestry resources in the TCSP area or nearby surrounding urban areas, the project would not contribute to a cumulative agricultural and forestry resources impact.

Overall, future development in the TCSP area, AEN, and Housing Element sites, combined with development in the surrounding cumulative study areas, would not result in a cumulatively significant agricultural and forestry resources impact due to the mostly urbanized and non-agricultural nature of the cumulative study area. Thus, the project's incremental contribution to agricultural and forestry resources impacts would not be cumulatively considerable and cumulative agricultural and forestry resources impacts would be less than significant. (Draft PEIR, pp. 7-3 through 7-4)

C. AIR QUALITY

Cumulative impacts to air quality may be regional or localized. Regional air quality would be impacted if emissions from the project contributed to cumulative degradation of air

quality in the SDAB. Localized air quality would be impacted if emissions from the project and other proximate emissions sources resulted in pollutant concentrations that exceeded standards at a sensitive receptor.

The study area for the assessment of cumulative regional air quality impacts is the SDAB which is considered a nonattainment area due to exceedances of the CAAQS for ozone and inhalable particulate matter (PM_{10} and $PM_{2.5}$). Future development within the study area could have a cumulative impact on air quality due to increased air pollution emissions associated with construction and operations, including transportation.

The cumulative assessment of regional air quality impacts to the SDAB relies partially on assessment of the project's consistency with the adopted RAQS and SIP. The RAQS and SIP are based on growth forecasts for the region, which are in turn based on maximum buildout of land uses as allowed in the adopted community and general plans. As discussed in Section 4.3.5, the project would update the TCSP but would not result in increased land use intensity compared to what is anticipated in the current TCSP, and thereby would not result in increased air emissions that were not accounted for in the Attainment Plan or RAQS. The project would be consistent with adopted land use plans upon which the RAQS was based, and a significant impact would not occur.

As detailed in Section 4.3.6, construction emissions associated with cumulative construction activities associated with buildout of the TCSP area, AEN, and Housing Element sites may result in some instances where future development would occur simultaneously; however, short term air quality emissions associated with construction would not cumulatively exceed the relevant thresholds. Therefore, cumulative construction-related regional air quality impacts for the TCSP, AEN, and Housing Element sites would be less than significant. Regarding cumulative operational emissions, while buildout of the project would not conflict with implementation of the RAQS, a cumulatively considerable net increase in emissions is identified for buildout of the TCSP area and AEN. The Housing Element sites are not identified to result in a cumulatively significant increase in operational emissions.

Mitigation Measure AQ-1 would be applied to address significant cumulative operational impacts associated with buildout of the TCSP area and AEN. This measure would require the use of electrically powered landscape equipment; however, operational emissions would still exceed maximum daily operational emissions. Therefore, the project's contribution to a significant cumulative effect is determined to be substantial relative to operational air quality emissions, and cumulative air quality impacts would remain significant and unavoidable. (Draft PEIR, pp. 7-4 through 7-5)

D. BIOLOGICAL RESOURCES

The study area for the assessment of cumulative impacts to biological resources includes the East County inland region composed of the City and neighboring jurisdictions identified above. As development occurs throughout this region, cumulative impacts to sensitive biological resources could occur, particularly with resources associated with the San Diego

River. However, cumulative impacts are expected to be addressed and minimized through compliance with resource planning documents such as the Multiple Species Conservation Plan, draft subarea plans, Resource Protection Ordinance, and Vernal Pool Habitat Conservation Plan and applicable federal and state regulatory standards and permit requirements.

As shown on Table 4.4-1 in Section 4.4, most of the TCSP area is developed; however, wetland and upland habitats are present within the TCSP area, AEN, and Housing Element Site 16A. Other biological resources have the potential to occur at any of the project areas, such as smooth tarplant and sensitive animal species. Mitigation measures BIO-1 through BIO-11 are included in Section 4.4 to mitigate potentially significant impacts to less than significant requiring focused surveys and translocation plans for smooth tarplant, exclusionary fencing, construction personnel training, revegetation requirements, pre-construction surveys, and jurisdictional waters and wetlands permitting requirements. Future development within the TCSP area and AEN, outside of the Housing Element sites, would also require a site-specific general biological resources survey in areas where the City has determined there to be potential for sensitive biological resources. For projects within the TCSP area and AEN, outside of the Housing Element sites in biologically sensitive areas, additional analysis would be required to identify the presence of sensitive species and appropriate mitigation would be applied to reduce potential impacts to less than significant. Mitigation measures in Section 4.4 address these potentially significant impacts to sensitive communities, including plant and animal species, and the project's contribution to cumulative biological resources impacts would also be reduced to less than significant.

Impacts to state or federally protected wetlands associated with future projects within the TCSP area, AEN, and Housing Element Site 16A would require mitigation for future development projects. The implementation of mitigation measure BIO-6, BIO-10, and BIO-11 would reduce impacts to a level less than significant and ensure that the project would not contribute to a significant cumulative impact to biological resources. (Draft PEIR, p. 7-5)

E. CULTURAL RESOURCES

The study area for the assessment of cumulative impacts to cultural resources includes the entirety of the City because loss of cultural resources associated with actions occurring in the City could affect the City's overall historic context and setting. Future development within the cumulative study area could have a cumulative impact on cultural resources through loss of records or artifacts as land is developed (or redeveloped).

As discussed in Section 4.5, future development in accordance with the project could impact historical or archaeological resources, which may be present within the TCSP area, AEN, and Housing Element sites. Implementation of mitigation measures CUL-1 through CUL-4 would reduce impacts to cultural resources to less than significant through the requirement for historic and archaeological surveys and archaeological monitoring during grading and construction for projects. Mitigation measure CUL-5 would reduce potential

historic resources impacts to the Edgemoor Polo Barn during future development of Housing Element Site 20A. Implementation of these measures would ensure that the project would not contribute to a significant cumulative impact to historical or archaeological resources. (Draft PEIR, p. 7-5 through 7-6)

F. ENERGY

The study area for energy is the San Diego Gas & Electric (SDG&E) service area which serves the County. New development or redevelopment within the service area could result in cumulative impacts associated with additional demands for energy, resulting in the need for new or expanded facilities. As discussed in Section 4.6, future development associated with implementation of development in the TCSP area and AEN would be subject to compliance with the CBC (Title 24) which aims to reduce excessive and inefficient energy use. As new development and redevelopment occurs, buildings will be required to comply with the Title 24 requirements in place at the time of building permit issuance. Project adherence with state and federal regulations and the Sustainable Santee Plan goals would also guide reductions in the City's collective long-term operational energy use. Other projects proposed in the City would similarly be required to comply with Title 24 and Sustainable Santee Plan goals. Therefore, the project would not contribute to a significant cumulative impact to energy. (Draft PEIR, p. 7-6)

G. GEOLOGY AND SOILS

The study area for the assessment of cumulative impacts related to geology and soils is the City. Future development in the City would be required to adhere to regulatory requirements including the CBC and SMC requirements for soils engineering/engineering geology reports and erosion control plans would prevent adverse effects associated with fault rupture, ground shaking, liquefaction, or landslides. Like the project, all future development would be required to adhere to all regulations applicable to the site/zone, including Chapter 11.40 (Grading Ordinance), which include objective standards relating to the elimination or reduction of potential seismic hazards prior to the issuance of permits. Additionally, all development would be subject to General Plan policies from the Safety Element. Future development within the TCSP area, AEN, and Housing Element sites, in addition to other future development throughout the City, would be required to adhere to regulatory requirements including preparation of Storm Water Pollution Prevention Plan and SMC Chapter 11.40 (Grading Ordinance) to ensure that they would not result in substantial soil erosion or the loss of topsoil. Adherence to CBC requirements as adopted by the City would ensure that future development would not create substantial direct or indirect risks associated with expansive soils. Therefore, the project would not contribute to a significant cumulative impact to these issues.

Regarding paleontological resources, the mitigation measure GEO-1 would reduce project impacts to a less than significant level. Additionally, other development in the City would be required to implement measures identified in the City's General Plan mitigation monitoring program for paleontological resources which would reduce impacts to a level less than significant. All potential impacts associated with geology and soils would be

reduced to less than significant levels because future development would be required to adhere to regulations and implement the General Plan EIR's existing mitigation framework. Additionally, mitigation measure GEO-1 would require applicants to provide information to the City regarding the paleontological sensitivity of the site. On properties determined to be moderately to highly sensitive for paleontological resources where grading would disturb sensitive formations, the ordinance shall require implementation of a mitigation plan. Therefore, implementation of mitigation measures GEO-1 and GEO-2 would ensure that the project would not contribute to a significant cumulative impact to paleontological resources. (Draft PEIR, p. 7-6 through 7-7)

H. GREENHOUSE GAS EMISSIONS

The analysis of GHG emissions is, by its nature, a cumulative issue; thus, the study area is global in nature. The analysis provided in Section 4.8 was modeled in year 2035 to align with the Sustainable Santee Plan emission projections. The Housing Element sites were modeled in the soonest operational year in 2026.

Development of the TCSP area and AEN would result in GHG emissions; however, the project would not result in an increase in anticipated development or traffic generation nor would it result in an increase in emissions that are not already accounted for in the Sustainable Santee Plan. However, mitigation measures GHG-1 through GHG-5 are included for the Housing Element sites to ensure implementation of identified GHG emissions strategies consistent with the Sustainable Santee Plan Project Consistency Checklist (Checklist) is completed for the Housing Element sites. Other future development within the TCSP area and AEN would be required to demonstrate compliance with Sustainable Santee Plan through completion of a Checklist.

Overall, the project would be consistent with the 2022 Scoping Plan, 2021 Regional Plan/Sustainable Communities Strategy, and Sustainable Santee Plan goals and would not conflict with GHG emissions reduction plans and impacts would be less than significant. Implementation of mitigation measures GHG-1 through GHG-5 would reduce GHG impacts associated with future development at the Housing Element sites and impacts would be mitigated to less than significant. Likewise, the project's contribution to cumulatively significant impacts associated with GHG emissions would be less than significant. (Draft PEIR, p. 7-7)

I. HAZARDOUS AND HAZARDOUS MATERIALS

The cumulative study area for the assessment of cumulative impacts to hazards and hazardous materials impacts is the City. As population growth increases, the number of people potentially exposed to hazards and hazardous materials would increase. The cumulative study area for airport hazards includes the entirety of the airport influence areas (AIA) for the Gillespie Field Airport and MCAS Miramar.

Generally, the release of hazardous materials has site-specific impacts that do not compound or increase in combination with impacts elsewhere. As discussed in Section

4.9, future development within the TCSP area, AEN, or Housing Element sites could result in hazards to the public or the environment by accidental release of hazardous materials. Mitigation measure HAZ-1 would require that future projects identify potentially hazardous conditions prior to grading, through preparation of a Phase I ESA and a Phase II ESA if necessary. Remediation of any contaminated soils would be required prior to development. Additionally, cumulative projects within the region would be required to comply with applicable federal, state, and local regulations of agencies having jurisdiction over hazardous materials, including the USEPA, federal Resource Conservation and Recovery Act, County Department of Health Services, and County of San Diego Department of Environmental Health. Therefore, implementation of mitigation measure HAZ-1 would ensure that the project would not contribute to a significant cumulative impact to hazards or the release of hazardous materials.

The ALUCP includes policies that are applicable within the AIA. To ensure safety compliance with the Gillespie Field ALUCP, future development must adhere to the existing City policies and regulations, and policies of the ALUCP. While the project allows development that could exceed the density allowed in Gillespie Field Safety Zones 3 and 4, all projects in these safety zones would similarly be subject to ALUC review and the project's incremental contribution to airport hazard impacts would not be cumulatively considerable. As discussed in Section 4.9, the project would not impair implementation of or physically interfere with the City's emergency response plan, evacuation routes and would not conflict with any Multi-Jurisdictional Hazard Mitigation Plan hazard mitigation goals. Furthermore, applications for all future projects within the project areas in addition to cumulative projects in the surrounding area would require review and approval by the Santee Fire Department prior to issuance of building permit. Therefore, the cumulative impacts associated with airport safety would be less than significant.

Regarding potential cumulative impacts related to wildfire, the TCSP area, including the AEN and Housing Element sites, are outside of the City's designated VHFHSZ which occurs north of the TCSP area. However, portions of the TCSP area, AEN, and Housing Element sites are within the WUI which identifies areas close to vacant sites with vegetation susceptible to fire. As a result, future development in the TCSP area, AEN, and Housing Element sites, as well as other cumulative projects in the City, would be required to comply with state and local regulations including SMC Chapter 11.18, which states all new developments, subdivisions, or tracts that are planned in WUI Areas shall have a minimum of 100 horizontal feet of "fuel modified" defensible space between structure and wildland areas. Adherence to these regulations and the General Plan policies would reduce risks in conjunction with future development related to wildland fire. Thus, the project's incremental contribution to wildfire impacts would not be cumulatively considerable and cumulative impacts would be less than significant. (Draft PEIR, p. 7-7 through 7-8)

J. HYDROLOGY AND WATER QUALITY

The study area for potential hydrology and water quality impacts is the Santee Drainage Basin. While future development within the Santee Drainage Basin has the potential to

increase pollutants discharged into surface waters, all future development would be subject to federal, state, and local regulations aimed at controlling water quality impacts, including SMC Chapters 9.06 (Stormwater Ordinance) and Chapter 11.40 (Grading Ordinance), which include requirements to ensure stormwater runoff is captured and treated and erosion control measures are implemented. Thus, based on the requirements of future development within the TCSP area, AEN, and Housing Element sites to comply with the existing regulatory framework that requires treatment of pollutants generated on-site, the project's incremental contribution to cumulative water quality impacts would be less than cumulatively considerable and cumulative impacts associated with water quality would be less than significant.

While future development has the potential to alter drainage patterns resulting in increased erosion, stormwater runoff, and impacts to the existing drainage system, all future development would be subject to federal, state, and local regulations aimed at reducing polluted storm water and avoiding overloading the City's drainage system. Development would be required to adhere to regulatory requirements including City Municipal Chapter 9.06 (Stormwater Ordinance), which includes requirements for the elimination or reduction of stormwater runoff. Impacts associated with drainage patterns and stormwater runoff would be less than cumulatively considerable and cumulative impacts associated with drainage would be less than significant.

Future development of the TCSP area, AEN, and Housing Element sites would be required to conform to applicable federal, state, and City regulatory standards to effectively avoid and/or address potential impacts associated with development in flood zones. The TCSP area, AEN, and Housing Element sites are not within an area anticipated to be adversely affected by a tsunami. Implementation of all regulatory requirements would ensure that cumulative impacts related to flood hazards would be less than significant. (Draft PEIR, pp. 7-8 through 7-9)

K. LAND USE AND PLANNING

The study area for the assessment of cumulative land use impacts would be the City and neighboring jurisdictions as detailed above. Cumulative land use impacts could result from changes to land use plans, which become incompatible and/or unsustainable. Adoption of the project could contribute to cumulative impacts if buildout would conflict with land use plans and/or policies or physically divide a community. As discussed in Section 4.11.6, the City's 2021-2029 Housing Element and current Zoning Ordinance allow up to 36 du/ac, and none of the residential densities established by the TCSP would exceed 36 du/ac. The proposed modifications to the TCSP would become part of the City's General Plan and Zoning Ordinance and would not conflict with applicable state and local land use requirements. Future development proposals within the City and surrounding jurisdictions would still subject to review for consistency with applicable plans and zoning ordinances that serve to reduce or avoid environmental impacts, including ALUC review for compatible densities within Gillespie Field Safety Zones 3 and 4. Further, no major features are proposed or known that would divide an established community. Therefore, cumulative

impacts related to land use and planning would be less than significant. (Draft PEIR, p. 7-9)

L. NOISE

The analysis for noise provided in Section 4.12 is cumulative in nature as it considers buildout conditions within the City. As discussed, the TCSP area, AEN, and Housing Element sites are in locations where noise levels are generally acceptable for the proposed uses; however, temporary project-related construction and operational noise was identified as less than significant with mitigation NOI-1 and NOI-2. NOI-3 is to regulate outdoor performance uses that could result in temporary increases in ambient noise levels if future events are not reduced to 60 A-weighted decibel one-hour equivalent noise level at nearby noise-sensitive land uses. The project would not generate a level of additional traffic that would perceptibly increase noise levels on roadways within and adjacent to the City. Despite the incorporation of NOI-3, outdoor noise levels were concluded at the project level to result in significant and unavoidable impacts. Therefore, while implementation of mitigation measure NOI-1 and NOI-2 would reduce some noise impacts associated with the project to a level less than significant, cumulative outdoor noise level impacts in the TCSP area may not be reduced to acceptable levels, and the project would result in a significant cumulative noise impact. (Draft PEIR, p. 7-9)

M. POPULATION AND HOUSING

The study area considered for the population and housing cumulative impact analysis is defined as the region (County). Buildout of the project would result in future construction of up to 3,140 new residential units, providing capacity for projected growth in the region consistent with the adopted zoning designations and densities currently allowed within the TCSP area, AEN, and Housing Element sites, and would also be consistent with the population and housing growth identified in the City's 2021-2029 Housing Element. The increase in housing stock would accommodate the projected growth in population in the region and is consistent with adopted plans and regional growth principles. No permanent displacement of housing or people would occur with implementation of the project. Significant population and housing impacts associated with cumulative development within the region is not anticipated to result in a displacement of housing or people because future development is generally growth accommodating and each jurisdiction has a mandate to comply with its adopted Housing Element. Therefore, cumulative impacts associated with population and housing would be less than significant. (Draft PEIR, p. 7-9 through 7-10)

N. PUBLIC SERVICES

The study area for public services is the applicable provider's service area. New development or redevelopment within the service area could result in cumulative impacts associated with additional demands for public services, resulting in the need for new or expanded facilities. As discussed in Section 4.14, all future development within the City would be reviewed to ensure that adequate facilities and services are available at the time of application. Other projects proposed in the City would similarly be required to

demonstrate adequate facilities are available prior to development. All future development is required to pay applicable fees that support schools. Cumulative impacts would be less than significant. (Draft PEIR, p. 7-10)

O. RECREATION

The study area for recreation is the City and nearby regional parks located within the City of San Diego and the County. New development or redevelopment within the service area could result in cumulative impacts associated with additional demands for recreation and parks, resulting in the need for new or expanded facilities. As discussed in Section 4.15, all future development within the City would be reviewed to ensure that adequate recreation opportunities are available at the time of application. Other projects proposed in the City would similarly be required to demonstrate adequate recreation opportunities are available prior to development. All future development is required to pay applicable fees that support recreational facilities. Cumulative impacts would be less than significant. (Draft PEIR, p. 7-10)

P. TRANSPORTATION

The study area for transportation is the region served by the Copper Line trolley which connects the TCSP area and the City with downtown San Diego. Future development of the region could result in significant cumulative impacts associated with transportation, particularly VMT. Buildout of the TCSP area, AEN, and Housing Element sites would occur in accordance with the land use and densities identified in the TCSP, some of which would occur within ½ mile of a major transit stop (including Housing Element Sites 16A and 16B). Also, several transportation projects would be implemented under the proposed TCSP, including multi-use pathways, bike routes, roadway connections throughout the TCSP area, AEN, and near the Housing Element sites. As discussed in Section 4.16.6, the transportation projects identified in the TCSP are intended to increase pedestrian and bicycle safety and connection within the TCSP area and would not result in an increase in VMT. The TCSP would mostly accommodate development near transit, enhance roadway connections within the TCSP area, and would not result in an increase in density or housing beyond what is permitted under current plans and zoning. No project level or cumulative impact will occur associated with VMT in relation to development in Housing Element Sites 20 A and 20B. However for areas outside TPAs, significant VMT impacts could occur with future development projects, contributing to significant cumulative impacts associated with VMT in a part of the region that has greater VMT per capita than the region as a whole. Mitigation measure TRA-1 would be applied to address significant VMT impacts associated with buildout of the TCSP area, AEN, and Housing Element Sites 20A and 20B. However, this measure cannot be guaranteed to reduce all VMT impacts to less than significant. Therefore, the project's contribution to a significant cumulative effect is determined to be substantial related to regional VMT, and cumulative VMT impacts would remain significant and unavoidable. (Draft PEIR, p. 7-10 through 7-11)

Q. TRIBAL CULTURAL RESOURCES

The study area for the assessment of cumulative impacts to tribal cultural resources includes the entirety of the tribal lands of those tribes that responded to the City's invitation for consultation under AB 52 associated with government-to-government consultation conducted by the City. Future development within the cumulative study area could have a cumulative impact on tribal cultural resources through loss of cultural landscapes, sacred places, or objects with cultural value as land is developed (or redeveloped).

As discussed in Section 4.17, future development in accordance with the project could impact historical or archaeological resources, which may be present within the TCSP area, AEN, and Housing Element sites. Implementation of mitigation measures CUL-1 through CUL-4 would also reduce impacts to tribal cultural resources to less than significant through the requirement to include Native American monitors and archaeological monitoring during grading and construction for projects. Implementation of these measures would ensure that the project would not contribute to a significant cumulative impact to tribal cultural resources. (Draft PEIR, p. 7-11)

R. UTILITIES AND SERVICE SYSTEMS

The study area for public utilities is the applicable provider's service area, including the PDMWD and SDCWA. Future development within the TCSP area, AEN, and Housing Element sites would occur within existing developed areas with access to existing utility infrastructure. Significant utility extensions or improvements are not anticipated beyond local connections from adjacent roadways. Similarly, other projects in the City would be required to undergo a similar review to ensure the environmental impacts of utility and services improvements are minimized. A cumulative impact related to 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, is not anticipated. Cumulative impacts related to utilities and service systems would be less than significant.

Development anticipated as part of the project would occur within areas of the City that are already served by existing stormwater and water infrastructure. Although development of the Housing Element sites would require connection to these existing facilities, stormwater and water infrastructure improvements would be evaluated upon submittal of project-specific development plans. All future project applications would be required to adhere to the mitigation framework presented in this EIR which would address physical impacts associated with construction of pipeline connections to existing stormwater and water infrastructure. The project's incremental contribution to stormwater and water facility impacts would not be cumulatively considerable.

Buildout potential within the TCSP area, AEN, and Housing Element sites could result in additional development that was not accounted for in the latest Urban Water Management Plan but has been accounted for within the PDMWD Water Supply Assessment approved by the PDMWD Board in 2024 (Appendix G). The PDMWD approved the Water Supply

Assessment for the project, which demonstrated that there is adequate capacity to adequately serve the anticipated buildout of the TCSP, AEN, and Housing Element sites. UWMPs are required to be updated on a five-year cycle and the next update to the PDMWD UWMP is anticipated by 2025. Future UWMP updates would account for the anticipated water use associated with future development consistent with the adopted TCSP and approved Water Supply Assessment. While the proposed TCSP area would add development potential within the City, it would primarily authorize higher density residential development which is more water efficient than single-family residential development. Based on the water efficiency of multi-family development, water conservation requirements, along with existing regulations that require new construction to be water efficient, it is not anticipated that the project would affect the ability of PDMWD to plan for adequate water supplies within the City during normal, dry, and multiple dry years. As the PDMWD and SDCWA consider water supply on a regional basis for their entire service areas, the project's incremental contribution to water system/water supply impacts would not be cumulatively considerable.

Cumulative impacts related to solid waste disposal would be less than significant because an existing regulatory framework is in place, detailed in Section 4.18.8, that would apply to future development associated with the project in addition to cumulative development within the City. Future development in the TCSP area, AEN and Housing Element sites is located within existing developed areas with access to solid waste disposal services. No development is proposed as part of the project; however, it is anticipated that future projects would result in an increase in solid waste generation. Solid waste requirements associated with the future development of the TCSP area, AEN, and Housing Element sites would be evaluated upon submittal of project-specific development plans. All projects would be reviewed for conformance with state and local regulations and adherence to General Plan and TCSP policies. Thus, with implementation of the existing regulatory framework addressing solid waste disposal, the project's incremental contribution to solid waste disposal impacts would not be cumulatively considerable. (Draft PEIR, p. 7-11 through 7-12)

S. WILDFIRE

The study area for the assessment of cumulative impacts related to wildfire is the City. Development within the TCSP area, AEN, and Housing Element sites would not physically interfere with any emergency response or evacuation plans because they would not include any features that would prevent continued implementation of these plans. Additionally, applicable General Plan Safety Element policies would continue to be implemented to ensure adequate citywide emergency response and preparedness. While none of the project components are within or adjacent to VHFHSZ, the project is within the WUI and could potentially result in impacts related to wildfire. However, future development within the TCSP area, AEN, and Housing Element sites would be required to adhere to all regulatory requirements in place to minimize wildfire hazards including applicable sections of the SMC, fire and building codes, and requirements from the fire marshal that would be identified during future building permit reviews. Additionally, implementation of the City's General Plan policies support implementation of measures

that will enhance wildfire safety. Future development projects would require review by the Building Official/Fire Marshal. All impacts associated with infrastructure improvements including any required measures to address fire safety would be evaluated in their respective subsequent environmental documents for discretionary projects, as necessary. The City fire marshal may also use their authority to require additional building, planning, or landscaping requirements that provide enhanced fire protection. Development would be required to comply with applicable regulations and policies related to flooding, drainage patterns, and landslides, and thereby avoid significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Like the project, all future development in the City would be required to comply with applicable SMC and building and fire code regulations that would reduce the potential for cumulative impacts. The project's incremental contribution to impacts related to wildfire would not be cumulatively considerable. (Draft PEIR, p. 7-12 through 7-13)

SECTION VI.
FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Sections 15126(c) and 15126.2(c) of the CEQA Guidelines, require that an EIR address any significant irreversible environmental changes that would occur should the project be implemented. Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The project would involve a large commitment of non-renewable resources;
- The primary and secondary impacts of the project would generally commit future generations to similar uses;
- The project involves uses in which irreversible damage could result from any potential environmental accidents; or
- The proposed consumption of resources is not justified.

Implementation of the TCSP area, AEN, and Housing Element sites would result in a significant, unavoidable impact related to net Increases of criteria pollutants and VMT at the project and cumulative levels. All other significant impacts identified in Chapter 4.0, Environmental Analysis, of the EIR can be reduced to below a level of significance with implementation of the mitigation framework provided in Chapter 4.0 of this EIR.

Non-renewable Resources. The majority of the TCSP area and AEN are located within existing developed or disturbed areas; however, the Housing Element sites are located on vacant land with potentially sensitive resources present. While the potential for impacts to biological habitat and cultural resources is low, there is a potential for impacts to resources at certain sites. Biological and cultural resource impacts associated with future development would be mitigated to a level less than significant, as described in Sections 4.4 and 4.5. The potential for paleontological resources impacts to occur associated with future development at the Housing Element sites would be mitigated to less than significant (Section 4.7) with implementation of a mitigation framework that would ensure paleontological monitoring is required (where appropriate). Implementation of the project would result in less than significant impacts to water bodies (drainage and water quality) as described in Section 4.10.

As described in Section 4.2, the Farmland Mapping and Monitoring Program classifies the majority of the Rezone Sites as “Urban and Built Up Land,” “Other Land,” and “Grazing Land.” The areas classified as “Grazing Lands” are not considered a significant farmland resource under CEQA. Portions of the project area are classified as “Farmland of Local Importance;” however, there is no recent history of agricultural use at these sites. There are no lands protected by a Williamson Act Contract within the City. Additionally, there is no forestland within the City, and the City does not possess any zoning classifications for

forestland, timberland, or timberland production zones. Therefore, no impacts to agricultural and forestry resources would occur.

Although portions of the TCSP area, AEN, and Housing Element sites in the vicinity of the San Diego River are located within a Mineral Resource Zone (MRZ) 2 designated area, these areas are not zoned for mining operations and no mining operations exist within the sites. While these lands may support mineral resources, mining operations at these sites would not be feasible considering the proximity to sensitive receptors and existing established neighborhoods. Furthermore, the project area is not designated as locally important mineral resource recovery sites in the City's General Plan. Therefore, the project would not result in the loss of availability of a known mineral resource or locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan, and impacts would be less than significant.

With regard to energy resources, actions related to future development would result in an irretrievable commitment of nonrenewable resources, including energy supplies and construction materials, such as lumber, steel, and aggregate. Non-renewable energy resources (coal, natural gas, oil) would be used in construction, heating and refrigeration of food and water, transportation, lighting, and other associated energy needs.

Residential and mixed-use development anticipated within the TCSP area, AEN, and Housing Element sites, together with other projects in the City, would require the commitment or destruction of other nonrenewable and slowly renewable resources. These resources include (but are not limited to) lumber and other forested products; sand and gravel; asphalt; petrochemical construction materials; steel, copper, lead, other metals; and water. However, the amount and rate of consumption of these resources would not result in significant environmental impacts because multi-family and mixed-use development are not uses that are associated with an unnecessary, inefficient, or wasteful use of resources.

As described previously, the TCSP area, AEN, and Housing Element sites are mainly developed with existing commercial uses or located on underutilized residential sites. Development in these areas would reinvigorate underutilized areas by allowing new residential uses in close proximity to commercial services and community facilities, while preserving established residential neighborhoods. Most of the project areas are presently developed. Development on vacant parcels would, however, result in the long term commitment to urbanization because reversion back to vacant land would be difficult and highly unlikely. However, the development of mid- to high-density residential units or mixed uses would result in an efficient provision of housing and efficient land use pattern.

In summary, future construction and operation associated with implementation of the TCSP area, AEN, and Housing Element sites would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses. Therefore, although irreversible environmental changes would result from future development, such changes would not be considered significant.

Secondary Impacts. The TCSP area, AEN, and Housing Element sites are accessible via major roadways (e.g., SR 52, 67, and 125, as well as numerous arterials and local streets) and are served by existing utilities, and other public services. As a result, secondary impacts are not anticipated from environmental changes resulting from the construction of new infrastructure, as discussed in Sections 4.14 and 4.18.

Environmental Accidents. The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. As described in Section 4.9, implementation of the proposed project would allow for the development of residential and mixed-uses (including commercial uses) that commonly store, use, and dispose of hazardous materials. Likewise, industries and businesses using hazardous materials may expand or increase to accommodate the projected population growth under buildout of the project.

Due to the nature of past and current land uses, future development/redevelopment within the City has the potential to expose people and the environment to hazards through the routine transport, use, disposal, or accidental release of hazardous materials. Businesses that are likely to store hazardous substances and petroleum products or generate waste include the following: gasoline service stations, automobile repair facilities, dry cleaning facilities, photograph developing facilities, and medical and dental facilities. While none of these uses are explicitly planned in the TCSP area, AEN, or Housing Element sites, future projects could propose these uses.

All future projects would be subject to review to ensure conformance with the Municipal Code, General Plan policies, and regulations imposed by federal, state, and local agencies. Compliance with applicable federal, state, and local hazardous materials regulations such as the Chemical Accident Prevention Provision, Emergency Planning and Community Right-to-Know Act, the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the California Health and Safety Code, California Code of Regulations Title 23, the Aboveground Petroleum Storage Act, California Accidental Release Prevention Program, and the California Emergency Services Act would ensure that buildout of the Housing Element sites would not result in irreversible environmental damage related to the accidental release of hazardous materials. (Draft PEIR, pp. 5-1 through 5-3)

SECTION VII.
GROWTH-INDUCING IMPACTS

Section 15126.2(e) of the State CEQA Guidelines requires a Draft EIR to discuss the ways the Project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. In accordance with State CEQA Guidelines Section 15126.2(e), a Project would be considered to have a growth-inducing effect if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing in the surrounding environment;
- Remove obstacles to population growth (e.g., construction of an infrastructure expansion to allow for more construction in service areas);
- Tax existing community service facilities, requiring the construction of new facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

In addition, CEQA Guidelines state that growth inducement must not be assumed.

Population and Housing Growth. The project would result in the expansion of the boundaries of the overall TCSP area and create updated development standards, and conceptual development plans and Objective Design Standards for Housing Element sites. Buildout of the TCSP would result in an increase of approximately 3,140 dwelling units and 2,287,189 sf of non-residential development in the TCSP area. Of that growth, 1,480 dwelling units and 1,792,103 sf of non-residential development would be within the AEN. Development at Housing Element sites 16A, 16B, 20A, and 20B would result in an increase of 1,480 dwelling units and 389,651 sf of non-residential development pursuant to the maximum densities permitted in the City's adopted 6th Cycle Housing Element and state density bonus assumptions. Non-residential development throughout the TCSP area, AEN, and Housing Element sites would generally be composed of local neighborhood-serving retail and office uses, intended to serve the residents of new and existing housing in the immediate area. The potential for new residential and non-residential development within the TCSP area would foster economic growth consistent with the City's General Plan (see EIR Section 4.13.5 for more discussion on population growth). Buildout of the TCSP would therefore be consistent with existing projections for development in the City and would not be considered growth inducing in regard to significant economic or employment growth.

Removal of an Impediment to Growth. The project does not propose the construction or expansion of new services or infrastructure to currently unserved or undeveloped areas; rather it would update the TCSP to facilitate development and supporting infrastructure consistent with the City's General Plan, including its most recently adopted Housing

Element. A vast majority of the permitted future residential and mixed-use development would occur as infill development and redevelopment within the urbanized TCSP area, which is already served by essential roads, utilities, and public services. Therefore, the project would not remove an impediment to growth.

Foster Economic or Employment Growth. Buildout of the TCSP area would result in an increase of approximately 2,287,189 sf of non-residential development in the TCSP area, including 1,792,103 sf of non-residential development within the AEN. Development at Housing Element sites 16A, 16B, 20A, and 20B would also result in an increase of 389,651 sf of non-residential development. New non-residential development would generally be composed of local neighborhood-serving retail and office uses, intended to serve the residents of existing and planned housing in the immediate area. Economic and employment growth because of the additional development would be consistent with the City's growth projections within their General Plan and would not be considered growth inducing in regard to significant economic or employment growth for the City.

Conclusion. Overall, the project would facilitate growth through updating the TCSP area and development standards, consistent with the City's General Plan, including its most recently adopted Housing Element. The project would not remove an impediment to growth; nor does it propose to develop or permit the encroachment into an isolated area adjacent to open space or foster economic and employment expansion. As discussed above, the project would accommodate projected population growth and would not be considered growth inducing because it would provide residential and non-residential capacity for projected population growth. The opportunities to provide housing would be consistent with the City's need to establish a resilient housing base for the community and to comply with state law. (Draft PEIR, pp. 6-1 through 6-2)

SECTION VIII.
ALTERNATIVES

A. BACKGROUND

The Draft PEIR analyzed two alternatives to the project as proposed and evaluated these alternatives for their ability to avoid or reduce the project's significant environmental effects while also meeting the majority of the project's objectives. The City finds that it has considered and rejected as infeasible the alternatives identified in the EIR and described below. This section sets forth the potential alternatives to the project analyzed in the EIR and evaluates them in light of the project objectives, as required by CEQA.

Where significant impacts are identified, section 15126.6 of the State CEQA Guidelines requires EIRs to consider and discuss alternatives to the proposed actions. Subsection (a) states:

> (a) An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subsection 15126.6(b) states the purpose of the alternatives analysis:

> (b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

In subsection 15126.6(c), the State CEQA Guidelines describe the selection process for a range of reasonable alternatives:

> (c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be

> discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project.

B. PROJECT OBJECTIVES

The following objectives have been established for the Project (Draft PEIR, pp. 9-1 through 9-2):

- Allow for a unified comprehensive open space system to be an integral part of the basic design concept of the TCSP area. The river shall be an open space area for the benefit of the community;

- Provide and encourage both active and passive recreational opportunities to help meet the recreational needs of the community;

- Establish criteria for architectural designs and concepts that reinforce the sense of community identity and support high quality development. These criteria should foster uniqueness and cohesive design enhancing Santee's character;

- Use landscape design to enhance the quality of the environment, resiliency of the community, and contribute to high quality, safe, and sustainable development;

- Provide for the development of a varied, safe, efficient, and cost-effective transportation system to adequately support the mobility needs of the TCSP area with minimal negative impact on the community;

- Provide a variety of housing types and sizes with a mixture of ownership and rental housing;

- Create a variety of commercial and office/professional opportunities to provide goods, services, and employment opportunities to the region and establish the TCSP area as an activity center of the community;

- Incorporate community-serving, civic, and public uses within the TCSP area to become focal points for residents and visitors to enjoy;

- Limit new institutional uses within the TCSP area;

- Establish employment-supportive uses as part of new developments to provide job opportunities for the community and establish revenue sources within the TCSP area. These should include research and development and office/ professional types of uses; and

- Provide for housing development opportunities on Housing Element sites 16A, 16B, 20A, and 20B consistent with the City's adopted Housing Element for 2021-2029

C. ALTERNATIVES CONSIDERED BUT REJECTED FROM DETAILED ANALYSIS

Section 15126.6(c) of the State CEQA Guidelines specifies that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process; and (2) briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; and/or (iii) inability to avoid significant environmental impacts.

Four alternatives were considered but rejected and are not analyzed further. Specifically, a No Project (No Build) Alternative was considered which would assume existing conditions would remain and buildout of the vacant areas subject to the adopted TCSP would not occur. This alternative was rejected because the adopted TCSP would continue to guide land use and development decisions within the TCSP area, and development would continue to be allowed within the project area per existing plans and regulation. A "no build" alternative is more commonly included in an alternatives analysis if the applicant or Lead Agency has the authority or ability to not develop a project and maintain existing conditions.

Other alternatives considered but rejected included two reduced residential alternatives. The Reduced Residential Alternative (Site 20A) considered changing the land uses of Site 20A from Residential TC-R-22 MU to Park/Open Space but was rejected as it would not implement the adopted Housing Element. Similarly, a Reduced Residential Alternative (sites 16A, 16B, 20A, and 20B) was considered to reduce the density at each of the Housing Element sites; however, this alternative was rejected as it would also not implement the adopted and certified Housing Element. Lastly, an Increased Institutional Alternative (sites 20A and 20B) was considered that would change the zoning at Housing Element Sites 20A and 20B from Residential TC-R-22 MU to Institutional at the request of the County of San Diego Department of General Services; however, this alternative would also not implement the adopted and certified Housing Element. It is important for the City to have an adopted and certified Housing Element because when a jurisdiction's Housing

Element is found to be out of compliance, its General Plan is at risk of being deemed inadequate, and therefore, invalid. Cities without a valid Housing Element may also be at risk of losing state and federal funding for certain activities.

D. EVALUATION OF ALTERNATIVES SELECTED FOR ANALYSIS

The alternatives selected for further detailed review within the EIR focus on alternatives that could the Project's significant environmental impacts, while still meeting most of the basic Project objectives. Those alternatives include:

- Alternative 1: No Project (No Rezone Program) Alternative (Draft PEIR, pp. 9-4 through 9-10)
- Alternative 2: Reduced Biological Impacts Alternative (Draft PEIR, pp. 9-10 through 9-17)
- Alternative 3: Increased Density/Transit Oriented Design Alternative (Draft PEIR, pp. 9-17 through 9-23)
- Alternative 4: No Outdoor Performance Use Alternative (Draft PEIR, pp. 9-23 through 9-30)

1. Alternative 1: No Project (No Rezone Program) Alternative

Description: Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), the No Project Alternative represents the continued implementation of the TCSP land use and development standards, including the current boundaries of the overall TCSP area and existing Arts and Entertainment Overlay District (AEOD) boundary. Under the No Project Alternative, development within the current TCSP area boundaries would proceed pursuant to the adopted TCSP and 2021-2029 Housing Element and would not include updated development standards and conceptual development plans and design standards for Housing Element sites 16A, 16B, 20A, and 20B. Also, the No Project Alternative would not include the proposed roadway network upgrades and roadway connections or associated pedestrian and bicycle improvements, including the River Bridge spanning the San Diego River. Other improvements identified in the TCSP, including outdoor events in the AEN, would not be included in the TCSP as proposed under the project. (Draft PEIR, p. 9-4)

Impacts

a. Aesthetics

Under the No Project Alternative, development within the TCSP area, AEN, and Housing Element sites would be subject to the existing TCSP as well as the City's General Plan and SMC. The No Project Alternative would not result in the expansion of the TCSP area and AEN and the updated development

standards and conceptual development plans and design standards for Housing Element sites 16A, 16B, 20A, and 20B. Although the proposed TCSP development and design standards would not apply to future development in the TCSP area and AEN and conceptual designs for the Housing Element sites would not be part of the TCSP, development could proceed based on the existing TCSP. Development under the No Project Alternative would be subject to Development review consistent with SMC Chapter 13.08 to ensure consistency with General Plan policies and applicable design and development review requirements including the existing design guidelines in the adopted TCSP. The development review process would ensure that future development would not degrade scenic vistas, scenic resources, or visual quality. Compliance with SMC standards related to light and glare (Chapter 13.08.070(G)), requiring that outdoor lighting be directed away from adjacent properties and set in a way to avoid any detriment to the surrounding area and lighting standards of the Community Enhancement Element would ensure that future development would not result in impacts related to light and glare. A mitigation measure identified to address potential impacts to the Edgemoor Polo Barn near Housing Element sites 20A and 20B (MM CUL-5) would not be implemented under the No Project Alternative; however, development within Housing Element sites 20A and 20B would still be required to demonstrate compliance with the Secretary of Interior Standards for the Treatment of Historic Properties. Potentially significant aesthetics impacts under the No Project Alternative would be similar to the project as the potential for development of Housing Element sites 20A and 20B has the potential to damage views of an historic resource at the Edgemoor Polo Barn.

b. Agriculture and Forestry Resources

Under the No Project Alternative, development within the TCSP area, AEN, and Housing Element sites would be subject to the adopted TCSP as well as the City's General Plan and SMC. While the proposed development and design standards and conceptual designs for Housing Element sites 16A, 16B, 20A, and 20B would not be adopted as part of the TCSP, areas identified as Farmland of Local Importance in the TCSP area and AEN would still be developed and would similarly result in less than significant impacts as these areas are identified for development and do not contain active agricultural uses. Therefore, impacts associated with agriculture and forestry resources under the No Project Alternative would be less than significant and similar to the project.

c. Air Quality

Future development under the No Project Alternative would be subject to the development standards in the adopted TCSP, as well as the City's General Plan and SMC, and therefore would be consistent with the existing growth

projections for which RAQS are based. Development potential would be similar compared to the project since there are no increases in density or development intensity associated with the project. Construction time frames and equipment for site-specific development projects are not available at this time, and there is a potential for multiple development projects to be constructed at one time, resulting in significant construction-related emissions. While future development under this alternative would be required to implement mitigation measures documented in the City's General Plan, mitigation for air quality impacts would remain significant and unavoidable. Therefore, impacts associated with air quality under the No Project Alternative would be significant and unavoidable, similar to the project.

d. Biological Resources

Future development under the No Project Alternative would occur as guided under the adopted TCSP, as well as the City's General Plan and SMC. The No Project Alternative would not include the River Bridge or outdoor performance uses in the AEN as these details are not identified in the adopted TCSP. Although not including the River Bridge and not allowing outdoor performances in the AEN would avoid some of the potential impacts to biological resources associated with the project, development consistent with the existing TCSP could still occur within areas that support sensitive biological resources.

Future development under the No Project Alternative would be subject to implementation of mitigation measures documented in the City's General Plan for biological resources, which would reduce impacts related to sensitive species, sensitive habitats, and wetlands to a level less than significant. Applicable federal, state, and local regulations would also apply, such as the FESA, MBTA, CFG Code, and San Diego County MSCP. Not constructing the River Bridge and not allowing outdoor performance uses in the AEN under the No Project Alternative would avoid some of the potentially significant project impacts on the biological resources along the San Diego River. Therefore, impacts related to biological resources under the No Project Alternative would remain less than significant with mitigation and would have slightly less impacts compared to the project.

e. Cultural Resources

Future development under the No Project Alternative would occur pursuant to the City's adopted TCSP, as well as the City's General Plan and SMC. The No Project Alternative would not include the River Bridge, as it is not included in the adopted TCSP. Future development under this alternative would be required to implement mitigation measures documented in the City's General Plan for cultural resources. As described in Section 4.5, the

project would result in less than significant cultural resources impacts with mitigation incorporated. Both the No Project Alternative and the proposed project would similarly result in potential impacts on historic resources due to the proximity of Housing Element sites 20A and 20B to the Edgemoor Polo Barn. The No Project Alternative would not include the River Bridge which is located within an area identified for moderate potential to contain eligible buried archaeological sites, and the potential for cultural resources impacts would be slightly reduced. Therefore, impacts related to cultural resources under the No Project Alternative would be less than significant with mitigation, slightly less than the project.

f. Energy

Future development under the No Project Alternative would be subject to the City's adopted TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would not be subject to the development and design standards and conceptual designs provided in the updated TCSP. Future development under the No Project Alternative would not result in increased energy use compared to the project as no changes to land uses or zoning are proposed. Therefore, impacts associated with energy would be less than significant, similar to the project.

g. Geology and Soils

Future development under the No Project Alternative would be subject to the City's adopted TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would not be subject to the development and design standards and conceptual designs provided in the updated TCSP. The No Project Alternative would support development consistent with the existing TCSP which could be subject to potential geologic hazards. Adherence to Safety Element policies, the SMC, and the CBC would ensure that future development under this alternative would not cause substantial adverse effects associated with fault rupture, ground shaking, liquefaction, landslide, or expansive soils, and impacts would be less than significant. Similarly, adherence to applicable SMC requirements would ensure that future development under this alternative would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant. Implementation of mitigation measures documented in the City's General Plan for paleontological resources would reduce impacts related to paleontological resources to a level less than significant. Therefore, impacts related to geology and soils under the No Project Alternative would be mitigated to a level less than significant, similar to the project.

h. Greenhouse Gas Emissions

Future development under the No Project Alternative would be subject to the City's adopted TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would not be subject to the development and design standards and conceptual designs provided in the updated TCSP. Future development under the No Project Alternative would also be subject to implementation of the City's Sustainable Santee Plan (Climate Action Plan). The project would result in less than significant GHG impacts with mitigation and impacts associated with GHG under the No Project Alternative would also be less than significant with mitigation, similar to the project.

i. Hazards and Hazardous Materials

The No Project Alternative would not involve changes to land use or zoning compared to the project, and thereby would not result in changes related to exposing potential hazards and hazardous materials to more people. Future development would be required to adhere to multiple regulations related to hazardous materials handling and transport, including applicable state and local regulatory measures. Citywide General Plan Safety Element policies would also support safe handling of hazardous materials. Future development under this alternative would be required to implement mitigation measures documented in the City's General Plan for hazardous materials. Future development under this alternative located within the Gillespie Field and MCAS Miramar ALUCPs would be required to adhere to applicable City policies and regulations, as well as policies of the ALUCP. Similar to the project, future development under the No Project Alternative could be determined by the ALUC to not conform to density requirements for areas identified within ALUCPs as potentially hazardous due to the proximity to an airstrip. Because the ALUC may identify a hazard during review of development under the No Project Alternative, impacts associated with hazards and hazardous materials under the No Project Alternative may also be significant and unavoidable, similar to the project.

j. Hydrology and Water Quality

Future development under the No Project Alternative would be subject to the City's adopted TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would not be subject to the development and design standards and conceptual designs provided in the updated TCSP. Future development under the No Project Alternative would be required to adhere to all applicable water quality standards as provided in various water quality regulations and plans including all pertinent requirements of the City's Jurisdictional Runoff Management Plan, BMP Design Manual, NPDES General Construction Permit, as well as all regulations related to water quality. Both redevelopment and new development on vacant sites would be

required to comply with applicable stormwater management requirements which focus on retention and infiltration of waters on-site. Additionally, development under this alternative would be required to comply with City General Plan policies and regulations that prioritize infiltration and treatment of stormwater. Future development would also be required to implement applicable stormwater BMPs and erosion control measures to retain flows on-site and minimize the velocity of stormwater runoff. Such BMPs could include on-site drainage swales, bioretention features, use of permeable pavers in parking areas and streets, or infiltration basins which also serve as a means for pollutant removal. Development under this alternative would be required to adhere to all state and local development regulations including the SMC (Chapter 11.36), which establishes Flood Damage Prevention standards. Therefore, impacts associated with hydrology and water quality under the No Project Alternative would be less than significant, similar to the project.

k. Land Use and Planning

Future development under the No Project Alternative would be subject to the City's adopted TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would not be subject to the development and design standards and conceptual designs provided in the updated TCSP. All future development under this alternative would be subject to a site-specific review that considers consistency with all applicable plans, including the City's General Plan and the ALUCP. As discussed above for hazards, the ALUC may determine a safety concern during future review of projects under the No Project Alternative and a significant land use conflict may result. Therefore, impacts related to land use under the No Project Alternative would be significant and unavoidable, similar to the project.

l. Noise

Future development under the No Project Alternative would be subject to the adopted TCSP, as well as the City's General Plan and SMC. The No Project Alternative would not include outdoor performance uses in the AEN as this activity is not identified in the existing TCSP. Future development under the No Project Alternative would be subject to implementation of mitigation measures documented in the City's General Plan for noise, which would reduce noise impacts to less than significant. Not allowing outdoor performance uses in the AEN under the No Project Alternative would avoid potentially significant noise impacts. Therefore, impacts related to noise under the No Project Alternative would be less than significant with mitigation and have less impacts compared to the project.

m. Population and Housing

Future development under the No Project Alternative would be located in areas that are already served by infrastructure as identified in the existing TCSP, and therefore would not induce population growth. The No Project Alternative would not displace a substantial number of people or housing. Therefore, impacts associated with population and housing would be less than significant, similar to the project.

n. Public Services

Future development under the No Project Alternative would be subject to the adopted TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would not be subject to the development and design standards and conceptual designs provided in the updated TCSP. Future development under the No Project Alternative would not result in increased demand to require construction of new fire protection, police protection, school, or library facilities, since each future development would pay its fair share toward anticipated facility needs. Construction of any future public service facilities would require a separate environmental review and approval. Therefore, impacts associated with public services would be less than significant, similar to the project.

o. Recreation

Future development under the No Project Alternative would be subject to the adopted TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would not be subject to the development and design standards and conceptual designs provided in the updated TCSP. Future development under the No Project Alternative would not result in increased demand to require construction of new recreational facilities since each future development would pay its fair share toward anticipated facility needs. Construction of any future public service facilities would require a separate environmental review and approval, implementing mitigation similar as proposed for the project. Therefore, impacts associated with recreation would be less than significant, similar to the project.

p. Transportation

Future development under the No Project Alternative would occur pursuant to the City's adopted TCSP, as well as the City's General Plan and SMC. The No Project Alternative would not include the roadway improvements identified in the project as they are not included in the existing TCSP. Future development would be designed consistent with established roadway design standards, and access to the existing roadway network would be configured consistent with established roadway design standards that would allow for

emergency access. Because the No Project Alternative applies the same land use densities and intensities in the project area, including within those areas located outside TPAs, significant VMT impacts could occur. Therefore, impacts associated with transportation would be significant and unavoidable, similar to the project.

q. Tribal Cultural Resources

Future development under the No Project Alternative would occur pursuant to the City's adopted TCSP, as well as the City's General Plan and SMC. The No Project Alternative would not include the River Bridge, which is consistent with the existing TCSP. Future development under this alternative would be required to conduct tribal consultation consistent with the requirements of AB 52. The No Project Alternative would not include the River Bridge which is located within an area identified for moderate potential to contain eligible buried archaeological sites, which may also be considered tribal cultural resources. As a result, the potential for tribal cultural resources impacts would be slightly reduced and impacts related to tribal cultural resources under the No Project Alternative would be less than significant with mitigation, slightly less than the project.

r. Utilities and Service Systems

Future development under the No Project Alternative would be subject to the adopted TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would not be subject to the development and design standards and conceptual designs provided in the updated TCSP. Development under the existing General Plan would increase demand for utilities and services. Utility infrastructure improvements and relocations under the No Project Alternative would be evaluated as part of a future review for site-specific projects. Should separate utility extensions be required outside of the footprints of future site-specific projects, they would require an environmental review and compliance with regulations in existence at that time would address potential environmental impacts. The No Project Alternative would likely result in similar demand for water supply, wastewater treatment, and solid waste disposal compared to development proposed under the project. Therefore, impacts associated with utilities and service system would be less than significant with mitigation, similar to as the project.

s. Wildfire

Future development under the No Project Alternative would be subject to the adopted TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would not be subject to the development and design standards and conceptual designs provided in the updated TCSP. This

alternative does not propose any changes to the City's existing circulation network, and no land uses are proposed that would impair implementation of or physically interfere with the City's emergency response plan, evacuation routes, or conflict with any of the Multi-Jurisdictional Hazard Mitigation Plan specific hazard mitigation goals, objectives, and related actions. Additionally, future development would be required to adhere to the City's General Plan (Safety Element) policies including 4.2, 4.3, 4.4, 4.11, and 4.12 which address emergency response and emergency evacuation. Future development located within the Wildland Urban Interface would comply with applicable California Fire Code and City General Plan requirements, and include enhanced fire protection measures as detailed in the City's building and fire codes. Future development under this alternative would also be required to comply with applicable regulations and policies related to flooding, drainage patterns, and landslides. Therefore, impacts associated with wildfire under the No Project Alternative would be less than significant, similar to the project.

As described above, the No Project Alternative would result in similar impacts compared to the project, with none of the environmental resources seeing an increase in the severity of impacts. Under the No Project Alternative, updated development standards and conceptual development plans and design standards for Housing Element sites 16A, 16B, 20A, and 20B would not be adopted as part of the TCSP to guide future development within the TCSP area and future development would be required to adhere to existing state and local regulations and would be required to implement relevant mitigation measures set forth in the City's General Plan EIR. Therefore, less than significant impacts (with and without mitigation) associated with aesthetics, agricultural resources, energy, geology, and soils, GHGs, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, recreation, utilities and service systems, and wildfire would be similar under the No Project Alternative compared to the project. Impacts to biological resources and cultural resources would be slightly reduced under this alternative due to the absence of the River Bridge in and near areas of biological and cultural sensitivity. Impacts related to air quality and VMT would remain significant and unavoidable, similar to the project.

Attainment of Project Objectives: This alternative would partially meet some of the project objectives stated in Chapter 3.0, Project Description, as the adopted TCSP does provide for mobility needs, a variety of housing types and commercial and office/professional opportunities, including employment-supportive uses. However, the proposed project is a comprehensive update to the adopted TCSP that addresses the future needs of the TCSP area and would better fulfill all of the project objectives. Buildout of the No Project Alternative would not include the River Bridge which would provide recreational opportunities and would be part of the open space system to unify areas north and south of the San Diego River within the AEN. Also, the No Project Alternative would not include the roadway improvements or

conceptual designs for Housing Element sites 16A, 16B, 20A, and 20B which would improve the mobility needs of the TCSP area and would provide for improved housing development opportunities.

Finding: The City Council rejects Alternative 1: No Project Alternative, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternative fails to meet many of the Project objectives; and (2) the alternative fails to avoid or reduce the Project's significant and unavoidable impacts relating to air quality, hazards, land use and planning, noise, and transportation.

2. Alternative 2: Reduced Biological Impacts Alternative

Description: The Reduced Biological Impacts Alternative represents a modified update to the TCSP to avoid some of the biological impacts identified for the project. Under this alternative the land use designations for an approximately 6-acre undeveloped area in the northeastern part of the TCSP area would be changed from Residential TC-R-14 (14 to 22 du/ac) to Floodway/Open Space. The 6-acre area is bound by Park Center Drive and Park/Open Space areas to the west, Institutional land uses to the north, and Residential land use to the south. The eastern part of the 6-acre site is bound by Cottonwood Avenue. This change would avoid impacts to 2.94 acres of biologically sensitive areas identified in the Biological Resources Technical Report (Appendix C). Also, the River Bridge over the San Diego River would not be included in the TCSP under the Reduced Biological Impacts Alternative, which would similarly avoid biologically sensitive areas in the TCSP area. The remaining aspects of the proposed TCSP, including the expansion of the TCSP area and AEN, updated development standards, proposed roadway network upgrades and roadway connections or associated pedestrian and bicycle improvements, and conceptual development plans and design standards for Housing Element sites 16A, 16B, 20A, and 20B, would remain as they are in the proposed project. While approximately 6 less acres of residential development would be available for development under the Reduced Biological Impacts Alternative, overall buildout of the TCSP area is assumed to be the same as the proposed project and as assumed in the City's 6th Housing Element because development would likely be able to shift to other portions of residentially designated land, as needed. (Draft PEIR, p. 9-10 through 9-11)

Impacts:

a. Aesthetics

Under the Reduced Biological Impacts Alternative, development within the TCSP area, AEN, and Housing Element sites would be similar to the proposed TCSP under the project, except that an area in the northeastern part of the TCSP area would be changed from Residential to Floodway/Open Space land uses and the River Bridge would not be constructed across the

San Diego River. Development under the Reduced Biological Impacts Alternative would be subject to development review consistent with SMC Chapter 13.08 to ensure consistency with General Plan policies and applicable design and development review requirements including the proposed design guidelines in the proposed update to the TCSP. The development review process would ensure that future development would not degrade scenic vistas, scenic resources, or visual quality. Compliance with SMC standards related to light and glare (Chapter 13.08.070(G)), requiring that outdoor lighting be directed away from adjacent properties and set in a way to avoid any detriment to the surrounding area and lighting standards of the Community Enhancement Element would ensure that future development would not result in impacts related to light and glare. A mitigation measure identified to address potential impacts to the Edgemoor Polo Barn near Housing Element sites 20A and 20B (MM CUL-5) would be implemented under the Reduced Biological Impacts Alternative as there would be no changes to the project near Housing Element sites 20A and 20B, which are in the southeastern part of the TCSP area and AEN. Potentially significant aesthetics impacts under the No Project Alternative would be similar to the project as the potential for development of Housing Element sites 20A and 20B has the potential to damage views of an historic resource at the Edgemoor Polo Barn.

b. Agricultural Resources

Under the Reduced Biological Impacts Alternative, development within the TCSP area, AEN, and Housing Element sites would be similar to the project, except that an area in the northeastern part of the TCSP area would be changed from Residential to Floodway/Open Space land uses and the River Bridge would not be identified across the San Diego River. Areas identified as Farmland of Local Importance in the TCSP area and AEN do not include the 6-acre site that would be changed to Floodway/Open Space and remaining areas would still be developed and similarly result in less than significant impacts. Therefore, impacts associated with agriculture and forestry resources under the Reduced Biological Impacts Alternative would be less than significant and similar to the project.

c. Air Quality

The updated TCSP under the Reduced Biological Impacts Alternative would be subject to the development standards in the updated TCSP, as well as the City's General Plan and SMC. While this alternative would reduce the amount of residential land uses at an approximately 6-acre area in the northeastern part of the TCSP area, it is not anticipated that overall residential development in the TCSP area would be decreased. As there would be no change in overall development under this alternative, the Reduced Biological Impacts Alternative would be consistent with the existing

growth projections for which regional air quality standards (RAQs) are based. Development potential would be similar compared to the project as it is expected that residential development would not decrease under this alternative. Construction time frames and equipment for site-specific development projects are not available at this time, and there is a potential for multiple development projects to be constructed at one time, resulting in significant construction-related emissions. While future development under this alternative would be required to implement air quality mitigation measures documented in the EIR, mitigation for air quality impacts would remain significant and unavoidable. Therefore, impacts associated with air quality under the Reduced Biological Impacts Alternative would be significant and unavoidable, similar to the project.

d. Biological Resources

The updated TCSP under the Reduced Biological Impacts Alternative would result in the redesignation of 6 acres of Residential land uses in the northeastern part of the TCSP area to Floodway/Open Space and would not include the proposed River Bridge. While this alternative would avoid impacts to some of the biologically sensitive areas in the TCSP area, development consistent with the updated TCSP could still occur within other areas that support sensitive biological resources.

Future development under the Reduced Biological Impacts Alternative would be subject to implementation of mitigation measures documented in this EIR for biological resources, which would reduce impacts related to sensitive species, sensitive habitats, and wetlands to a level less than significant. Applicable federal, state, and local regulations would also apply, such as the FESA, MBTA, CFG Code, and San Diego County MSCP. Not constructing housing in a 2.94-acre biologically sensitive area in the northeastern part of the TCSP area and leaving it as an undeveloped site would reduce some of the biological resources impacts associated with the project. Also, not constructing the River Bridge would avoid potentially significant project impacts on biological resources along the San Diego River. Therefore, impacts related to biological resources under the Reduced Biological Impacts Alternative would be less than significant with mitigation and would have slightly less impacts compared to the project.

e. Cultural Resources

The updated TCSP under the Reduced Biological Impacts Alternative would result in the redesignation of 6 acres of Residential land uses in the northeastern part of the TCSP area to Floodway/Open Space and would not include the proposed River Bridge. The 6-acre area that would be changed from Residential to Floodway/Open Space is not located in a culturally sensitive area; however, the River Bridge is located in a culturally sensitive

area and while this alternative would avoid some potential cultural resources impacts, development consistent with the updated TCSP could still occur in other areas that could result in cultural resources impacts.

Future development under the Reduced Biological Impacts Alternative would occur pursuant to the City's adopted TCSP, as well as the City's General Plan and SMC. Future development under this alternative would be required to implement mitigation measures documented in this EIR for cultural resources. As described in Section 4.5, the project would result in less than significant cultural resources impacts with mitigation incorporated. Both the Reduced Biological Impacts Alternative and the proposed project would similarly result in potential impacts on historic resources due to the proximity of Housing Element sites 20A and 20B to the Edgemoor Polo Barn. The Reduced Biological Impacts would not include the River Bridge which is located within an area identified for moderate potential to contain eligible buried archaeological sites, and the potential for cultural resources impacts would be slightly reduced. Therefore, impacts related to cultural resources under the Reduced Biological Impacts Alternative would be less than significant with mitigation, slightly less than the project.

f. Energy

Future development under the Reduced Biological Impacts Alternative would be subject to the updated TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would be subject to the development and design standards and conceptual designs provided in the updated TCSP. Future development under the Reduced Biological Impacts Alternative would not result in increased energy use compared to the project as no changes to overall buildout of the TCSP area are assumed. Therefore, impacts associated with energy would be less than significant, similar to the project.

g. Geology and Soils

Future development under the Reduced Biological Impacts Alternative would be subject to the City's updated development and design standards and conceptual designs provided in the updated TCSP, as well as the City's General Plan and SMC. The Reduced Biological Impacts Alternative would support development consistent with the updated TCSP which could be subject to potential geologic hazards. Adherence to Safety Element policies, the SMC, and the CBC would ensure that future development under this alternative would not cause substantial adverse effects associated with fault rupture, ground shaking, liquefaction, landslide, or expansive soils, and impacts would be less than significant. Similarly, adherence to applicable SMC requirements would ensure that future development under this alternative would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant. Implementation of mitigation

measures documented in this EIR for paleontological resources would reduce impacts related to paleontological resources to a level less than significant. Therefore, impacts related to geology and soils under the Reduced Biological Impacts Alternative would be mitigated to a level less than significant, similar to the project.

h. Greenhouse Gas Emissions

Future development under the Reduced Biological Impacts Alternative would be subject to the City's updated development and design standards and conceptual designs provided in the updated TCSP, as well as the City's General Plan and SMC. Future development under the Reduced Biological Impacts Alternative would also be subject to implementation of the City's Sustainable Santee Plan (Climate Action Plan). While residential land uses would be reduced under this alternative, buildout of the TCSP area is anticipated to be the same as the project. The project would result in less than significant GHG impacts with mitigation and impacts associated with GHG under the Reduced Biological Impacts Alternative would also be less than significant with mitigation, similar to the project.

i. Hazards and Hazardous Materials

The updated TCSP under the Reduced Biological Impacts Alternative would result in the redesignation of 6 acres of Residential land uses in the northeastern part of the TCSP area to Floodway/Open Space and would not include the proposed River Bridge. Overall buildout and development intensity is anticipated to be the same under this alternative and the proposed project. Future development would be required to adhere to multiple regulations related to hazardous materials handling and transport, including applicable state and local regulatory measures. Citywide General Plan Safety Element policies would also support safe handling of hazardous materials. Future development under this alternative would be required to implement mitigation measures documented in this EIR for hazardous materials. Future development under this alternative located within the Gillespie Field and MCAS Miramar ALUCPs would be required to adhere to applicable City policies and regulations, as well as policies of the ALUCP. Furthermore, applications for all future projects under the Reduced Biological Impacts Alternative would be reviewed and approved by the Santee Fire Department prior to issuance of a building permit. Similar to the project, future development under the Reduced Biological Impacts Alternative could be determined by the ALUC to not conform to density requirements for areas identified within ALUCPs as potentially hazardous due to the proximity to an airstrip. Because the ALUC may identify a hazard under the Reduced Biological Impacts Alternative, impacts associated with hazards and hazardous materials under the Reduced Biological Impacts Alternative may also be significant and unavoidable, similar to the project.

j. Hydrology and Water Quality

The updated TCSP under the Reduced Biological Impacts Alternative would result in the redesignation of 6 acres of Residential land uses in the northeastern part of the TCSP area to Floodway/Open Space and would not include the proposed River Bridge. Overall buildout and development intensity is anticipated to be the same under this alternative and the proposed project. Future development under the Reduced Biological Impacts Alternative would be required to adhere to all applicable water quality standards as provided in various water quality regulations and plans including all pertinent requirements of the City's Jurisdictional Runoff Management Plan, BMP Design Manual, NPDES General Construction Permit, as well as all regulations related to water quality. Both redevelopment and new development on vacant sites would be required to comply with applicable stormwater management requirements which focus on retention and infiltration of waters on-site. Additionally, development under this alternative would be required to comply with City General Plan policies and regulations that prioritize infiltration and treatment of stormwater. Future development would also be required to implement applicable stormwater BMPs and erosion control measures to retain flows on-site and minimize the velocity of stormwater runoff. Such BMPs could include on-site drainage swales, bioretention features, use of permeable pavers in parking areas and streets, or infiltration basins which also serve as a means for pollutant removal. Development under this alternative would be required to adhere to all state and local development regulations including SMC (Chapter 11.36), which establishes Flood Damage Prevention standards. Therefore, impacts associated with hydrology and water quality under the Reduced Biological Impacts Alternative would be less than significant, similar to the project.

k. Land Use and Planning

The updated TCSP under the Reduced Biological Impacts Alternative would result in the redesignation of 6 acres of Residential land uses in the northeastern part of the TCSP area to Floodway/Open Space and would not include the proposed River Bridge. Overall buildout and development intensity is anticipated to be the same under this alternative and the proposed project. Future development under the Reduced Biological Impacts Alternative would be subject to the City's updated development and design standards and conceptual designs provided in the updated TCSP, as well as the City's General Plan and SMC. All future development under this alternative would be subject to a site-specific review that considers consistency with all applicable plans, including the updated TCSP and ALUCP. The ALUC may determine a safety concern during future review of projects under the No Project Alternative and a significant land use conflict may result. Therefore, impacts related to land use under the Reduced

Biological Impacts Alternative would be significant and unavoidable, similar to the project.

l. Noise

Future development under the Reduced Biological Impacts Alternative would be subject to the updated TCSP, as well as the City's General Plan and SMC. The Reduced Biological Impacts Alternative would not include residential development in a 6 acre area in the northeastern part of the TCSP area and would also not include the River Bridge spanning the San Diego River. Future development under the Reduced Biological Impacts Alternative would be subject to implementation of mitigation measures documented in this EIR for noise, which would reduce noise impacts to less than significant. Removing residential land uses and the River Bridge under the Reduced Biological Impacts Alternative would not avoid potentially significant noise impacts associated with construction and stationary sources and outdoor performances. Therefore, impacts related to noise under the Reduced Biological Impacts Alternative would be less than significant with mitigation and have less impacts compared to the project.

m. Population and Housing

Future development under the Reduced Biological Impacts Alternative would be located in areas that are already served by infrastructure as identified in the existing TCSP, and therefore would not induce population growth. While there would be less Residential land uses in the TCSP area, buildout under this alternative would not be reduced compared to the project. The Reduced Biological Impacts Alternative would not displace a substantial number of people or housing. Therefore, impacts associated with population and housing would be less than significant, similar to the project.

n. Public Services

Future development under the Reduced Biological Impacts Alternative would not result in increased demand to require construction of new fire protection, police protection, school, or library facilities, since each future development would pay its fair share toward anticipated facility needs. Construction of any future public service facilities would require a separate environmental review and approval. Therefore, impacts associated with public services would be less than significant, similar to the project.

o. Recreation

Future development under the Reduced Biological Impacts Alternative would be located in areas that are already served by infrastructure as identified in the existing TCSP, and therefore would not result in increased demand to

require construction of new recreational facilities since each incremental housing development would pay its fair share toward anticipated facility needs. Construction of any future recreation facilities would require a separate environmental review and approval. Therefore, impacts associated with recreation would be less than significant, similar to the project.

p. Transportation

Future development under the Reduced Biological Impacts Alternative would occur pursuant to the City's updated TCSP, as well as the City's General Plan and SMC. While there would be less Residential land uses in the TCSP area, buildout under this alternative would not be reduced compared to the project and traffic levels would not change. The Reduced Biological Impacts Alternative would include the roadway improvements identified in the updated TCSP. Future development would be designed consistent with established roadway design standards, and access to the existing roadway network would be configured consistent with established roadway design standards that would allow for emergency access. Because the Reduced Biological Impacts Alternative applies the same land use densities and intensities in the majority of the project area, including within those areas located outside TPAs, significant VMT impacts could occur. Therefore, impacts associated with transportation would be significant and unavoidable, similar to the project.

q. Tribal Cultural Resources

The updated TCSP under the Reduced Biological Impacts Alternative would result in the redesignation of 6 acres of Residential land uses in the northeastern part of the TCSP area to Floodway/Open Space and would not include the proposed River Bridge. The 6-acre area that would be changed from Residential to Floodway/Open Space is not located in a culturally sensitive area; however, the River Bridge is located in a culturally sensitive area that could also be a tribal cultural resource. While this alternative would avoid some potential tribal cultural resources impacts, development consistent with the updated TCSP could still occur in other areas that could result in tribal cultural resources impacts.

Future development under the Reduced Biological Impacts Alternative would occur pursuant to the City's adopted TCSP, as well as the City's General Plan and SMC. Future development under this alternative would be required to implement mitigation measures documented in this EIR for tribal cultural resources. As described in Section 4.17, the project would result in less than significant tribal cultural resources impacts with mitigation incorporated. The Reduced Biological Impacts would not include the River Bridge which is located within an area identified for moderate potential to contain eligible buried archaeological sites, and the potential for tribal cultural resources

impacts would be slightly reduced. Therefore, impacts related to tribal cultural resources under the Reduced Biological Impacts Alternative would be less than significant with mitigation, slightly less than the project.

r. Utilities and Service Systems

Future development under the Reduced Biological Impacts Alternative would be subject to the updated TCSP land use plan and zoning, development and design standards, and conceptual designs provided in the updated TCSP. Development under this alternative, like the project, would increase demand for utilities and services. Utility infrastructure improvements and relocations under the Reduced Biological Impacts Alternative would be evaluated as part of a future review for site-specific projects. Should separate utility extensions be required outside of the footprints of future site-specific projects, they would require an environmental review and compliance with regulations in existence at that time would address potential environmental impacts. The Reduced Biological Impacts Alternative would likely result in similar demand for water supply, wastewater treatment, and solid waste disposal compared to development proposed under the project. Therefore, impacts associated with utilities and service system would be less than significant with mitigation, similar to the project.

s. Wildfire

Future development under the Reduced Biological Impacts Alternative would be subject to the updated TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would be subject to the development and design standards and conceptual designs provided in the updated TCSP. This alternative does not include land use changes that would impair implementation of or physically interfere with the City's emergency response plan, evacuation routes, or conflict with any of the Multi-Jurisdictional Hazard Mitigation Plan specific hazard mitigation goals, objectives, and related actions. Additionally, future development would be required to adhere to the City's General Plan (Safety Element) policies including 4.2, 4.3, 4.4, 4.11, and 4.12 which address emergency response and emergency evacuation. Future development under this alternative would also be required to comply with applicable regulations and policies related to flooding, drainage patterns, and landslides. Therefore, impacts associated with wildfire under the Reduced Biological Impacts Alternative would be less than significant, similar to the project.

As described above, the Reduced Biological Impacts Alternative would result in similar impacts compared to the project, with none of the environmental resources seeing an increase in the severity of impacts. Under the Reduced Biological Impacts Alternative, most of the updated TCSP under the project would be similar; however, the land use designations for an approximately 6-acre undeveloped area

in the northeastern part of the TCSP area would be changed from Residential TC-R-14 (14 to 22 du/ac) to Floodway/Open Space and the River Bridge would not be included. Therefore, less than significant impacts (with and without mitigation) associated with aesthetics, agricultural resources, energy, geology, and soils, GHGs, hydrology and water quality, population and housing, public services, recreation, utilities and service systems, and wildfire would be similar under the Reduced Biological Impacts Alternative compared to the project. Impacts to biological resources and cultural resources would be slightly reduced under this alternative due to the redesignation of 6 acres from Residential to Floodway/Open Space and the removal of the River Bridge in and near areas of biological and cultural sensitivity. Impacts related to air quality, hazards, land use and planning, noise, and transportation would remain significant and unavoidable, similar to the project.

Attainment of Project Objectives: This alternative would partially meet some of the project objectives stated in Chapter 3.0, Project Description, as this alternative does provide for mobility needs, a variety of housing types and commercial and office/professional opportunities, including employment-supportive uses. Buildout of the Reduced Biological Impacts Alternative would not include the River Bridge which would provide recreational opportunities and would be part of the open space system to unify areas north and south of the San Diego River within the AEN and would better meet the project objectives.

Finding: The City Council rejects Alternative 2: Reduced Project Alternative, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternative partially meets the Project objectives; and (2) the alternative fails to avoid or reduce the Project's significant and unavoidable impacts relating to air quality, hazards, land use and planning, noise, and transportation.

3. Alternative 3: Increased Density/Transit Oriented Design Alternative

Description: The Increased Density/Transit Oriented Design Alternative represents a modified update to the TCSP to further support the City's goals to provide additional affordable housing opportunities in the City and within a TPA. Under this alternative, the Trolley Commercial land use designations near the center of the TCSP area and AEN would be revised to allow transit oriented development. Specifically, this alternative would allow residential development up to 36 du/ac consistent with the Residential TC-R-3030 (30 to 36 du/ac) land use designation in the TCSP. For the purposes of this alternatives analysis, potential increases in residential development are estimated at an additional 1,515 du in the TCSP area and AEN at a density of 34 du/ac. The remaining aspects of the proposed TCSP, including the expansion of the TCSP area and AEN, updated development standards, proposed roadway network upgrades and roadway connections or associated pedestrian and bicycle improvements, and conceptual development

plans and design standards for Housing Element sites 16A, 16B, 20A, and 20B, would remain as they are in the proposed project. (Draft PEIR, p. 9-17)

Impacts:

a. Aesthetics

Under the Increased Density/Transit Oriented Design Alternative, development within the TCSP area, AEN, and Housing Element sites would be similar to the proposed TCSP under the project, except that the Trolley Commercial land use designations near the center of the TCSP area and AEN would be revised to allow increased density, transit oriented development. Development under the Increased Density/Transit Oriented Design Alternative would be subject to development review consistent with SMC Chapter 13.08 to ensure consistency with General Plan policies and applicable design and development review requirements including the proposed design guidelines in the proposed update to the TCSP. The development review process would ensure that future development would not degrade scenic vistas, scenic resources, or visual quality. Compliance with SMC standards related to light and glare (Chapter 13.08.070(G)), requiring that outdoor lighting be directed away from adjacent properties and set in a way to avoid any detriment to the surrounding area and lighting standards of the Community Enhancement Element would ensure that future development would not result in impacts related to light and glare. This alternative does not propose changes to the Housing Element sites, and a mitigation measure identified to address potential impacts to the Edgemoor Polo Barn near Housing Element sites 20A and 20B (MM CUL-5) would be implemented under the Increased Density/Transit Oriented Design Alternative as there would be no changes to the project near Housing Element sites 20A and 20B. Potentially significant aesthetics impacts under the Increased Density/Transit Oriented Design Alternative would be similar to the project as the potential for development of Housing Element sites 20A and 20B still has the potential to damage views of an historic resource at the Edgemoor Polo Barn.

b. Agricultural Resources

Under the Increased Density/Transit Oriented Design Alternative, development within the TCSP area, AEN, and Housing Element sites would be similar to the project, except Trolley Commercial land use designations near the center of the TCSP area and AEN would be revised to allow increased density, transit oriented development. Areas identified as Farmland of Local Importance in the TCSP area and AEN would still be developed and similarly result in less than significant impacts as these areas are identified for development and do not contain active agricultural uses. Therefore, impacts associated with agriculture and forestry resources under

the Increased Density/Transit Oriented Design Alternative would be less than significant and similar to the project.

c. Air Quality

The updated TCSP under the Increased Density/Transit Oriented Design Alternative would be subject to the development standards in the updated TCSP, as well as the City's General Plan and SMC. This alternative would increase the amount of residential land uses within the Trolley Commercial land uses in the central part of the TCSP area and AEN by an additional 1,515 du. As there would be an increase in overall development under this alternative, the Increased Density/Transit Oriented Design Alternative would not be consistent with the existing growth projections for which RAQS are based. Construction time frames and equipment for site-specific development projects are not available at this time, and there is a potential for multiple development projects to be constructed at one time, resulting in significant construction-related emissions. As future development under this alternative would be required to implement mitigation measures documented in this EIR, mitigation for air quality impacts would remain significant and unavoidable. Because there would be more development under this alternative, impacts associated with air quality under the Increased Density/Transit Oriented Design Alternative would be significant and unavoidable, and greater than the project.

d. Biological Resources

The updated TCSP under the Increased Density/Transit Oriented Design Alternative would result in an increase in the amount of residential land uses within the Trolley Commercial land uses in the central part of the TCSP area and AEN by an additional 1,515 du. This alternative would not avoid impacts to biologically sensitive areas and development under the Increased Density/Transit Oriented Design Alternative still occur within areas that support sensitive biological resources.

Future development under the Increased Density/Transit Oriented Design Alternative would be subject to implementation of mitigation measures documented in this EIR for biological resources, which would reduce impacts related to sensitive species, sensitive habitats, and wetlands to a level less than significant. Applicable federal, state, and local regulations would also apply, such as the FESA, MBTA, CFG Code, and San Diego County MSCP. Adding housing in the Trolley Commercial land uses would not reduce any of the biological resources impacts associated with the project. Therefore, impacts related to biological resources under the Increased Density/Transit Oriented Design Alternative would be less than significant with mitigation and would have similar impacts compared to the project.

e. Cultural Resources

The updated TCSP under the Increased Density/Transit Oriented Design Alternative would result in an increase in the amount of residential land uses within the Trolley Commercial land uses in the central part of the TCSP area and AEN by an additional 1,515 du. This alternative would not avoid impacts to culturally sensitive areas and development under the Increased Density/Transit Oriented Design Alternative still occur within areas that support sensitive cultural resources.

Future development under the Increased Density/Transit Oriented Design Alternative would occur pursuant to the City's adopted TCSP, as well as the City's General Plan and SMC. Future development under this alternative would be required to implement mitigation measures documented in this EIR for cultural resources. As described in Section 4.5, the project would result in less than significant cultural resources impacts with mitigation incorporated. Both the Increased Density/Transit Oriented Design Alternative and the proposed project would similarly result in potential impacts on historic resources due to the proximity of Housing Element sites 20A and 20B to the Edgemoor Polo Barn. Therefore, impacts related to cultural resources under the Increased Density/Transit Oriented Design Alternative would be less than significant with mitigation, similar to the project.

f. Energy

Future development under the Increased Density/Transit Oriented Design Alternative would be subject to the updated TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would be subject to the development and design standards and conceptual designs provided in the updated TCSP. Future development under the Increased Density/Transit Oriented Design Alternative would result in some increased energy use compared to the project as overall buildout of the TCSP area would increase by 1,515 du; however, the increase in development would occur near transit and urban uses and would not conflict with energy plans or result in wasteful or inefficient energy use. Impacts associated with energy would be less than significant, similar to the project.

g. Geology and Soils

Future development under the Increased Density/Transit Oriented Design Alternative would be subject to the City's updated development and design standards and conceptual designs provided in the updated TCSP, as well as the City's General Plan and SMC. The Increased Density/Transit Oriented Design Alternative would support development consistent with the updated TCSP which could be subject to potential geologic hazards. Adherence to

Safety Element policies, the SMC, and the CBC would ensure that future development under this alternative would not cause substantial adverse effects associated with fault rupture, ground shaking, liquefaction, landslide, or expansive soils, and impacts would be less than significant. Similarly, adherence to applicable SMC requirements would ensure that future development under this alternative would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant. Implementation of mitigation measures documented in this EIR for paleontological resources would reduce impacts related to paleontological resources to a level less than significant. Therefore, impacts related to geology and soils under the Increased Density/Transit Oriented Design Alternative would be mitigated to a level less than significant, similar to the project.

h. Greenhouse Gas Emissions

Future development under the Increased Density/Transit Oriented Design Alternative would be subject to the City's updated development and design standards and conceptual designs provided in the updated TCSP, as well as the City's General Plan and SMC. Future development under the Increased Density/Transit Oriented Design Alternative would also be subject to implementation of the City's Sustainable Santee Plan (Climate Action Plan). Transit-oriented residential land uses would be increased under this alternative and buildout of the TCSP area is anticipated to include 1,515 du more than the project. The project would result in less than significant GHG impacts with mitigation and impacts associated with GHG under the Increased Density/Transit Oriented Design Alternative would also be less than significant with mitigation, and similar to the project.

i. Hazards and Hazardous Materials

The updated TCSP under the Increased Density/Transit Oriented Design Alternative would include an anticipated 1,515 additional du in the Trolley Commercial land uses in the central part of the TCSP area and AEN. Future development would be required to adhere to multiple regulations related to hazardous materials handling and transport, including applicable state and local regulatory measures. Citywide General Plan Safety Element policies would also support safe handling of hazardous materials. Future development under this alternative would be required to implement mitigation measures documented in this EIR for hazardous materials. Future development under this alternative located within the Gillespie Field and MCAS Miramar ALUCPs could increase the potential for land use compatibility issues related to aircraft overflight hazards and like the proposed project, developments allowed under this alternative would be required to adhere to applicable City policies and regulations, as well as policies of the ALUCP and FAA and may result in similar safety conflicts

during ALUC review. Therefore, impacts associated with hazards and hazardous materials under the Increased Density/Transit Oriented Design Alternative would be significant and unavoidable, similar to the project.

j. Hydrology and Water Quality

The updated TCSP under the Increased Density/Transit Oriented Design Alternative would result in the addition of residential development within the Trolley Commercial land uses in the central part of the TCSP area and AEN. Overall buildout and development intensity is anticipated to increase by 1,515 du compared to the proposed project. Future development under the Increased Density/Transit Oriented Design Alternative would be required to adhere to all applicable water quality standards as provided in various water quality regulations and plans including all pertinent requirements of the City's Jurisdictional Runoff Management Plan, BMP Design Manual, NPDES General Construction Permit, as well as all regulations related to water quality. Both redevelopment and new development on vacant sites would be required to comply with applicable stormwater management requirements which focus on retention and infiltration of waters on-site. Additionally, development under this alternative would be required to comply with City General Plan policies and regulations that prioritize infiltration and treatment of stormwater. Future development would also be required to implement applicable stormwater BMPs and erosion control measures to retain flows on-site and minimize the velocity of stormwater runoff. Such BMPs could include on-site drainage swales, bioretention features, use of permeable pavers in parking areas and streets, or infiltration basins which also serve as a means for pollutant removal. Development under this alternative would be required to adhere to all state and local development regulations including the SMC (Chapter 11.36), which establishes Flood Damage Prevention standards. Therefore, impacts associated with hydrology and water quality under the Increased Density/Transit Oriented Design Alternative would be less than significant, similar to the project.

k. Land Use and Planning

The updated TCSP under the Increased Density/Transit Oriented Design Alternative would result in allowing residential development in the Trolley Commercial land use with a zoning designation of Residential TC-R-3030 (30 to 36 du/ac). This alternative is estimated to result in an additional 1,515 du in the TCSP area and AEN compared to the project which would not allow residential in the Trolley Commercial land use. Future development under the Increased Density/Transit Oriented Design Alternative would be subject to the City's updated development and design standards and conceptual designs provided in the updated TCSP, as well as the City's General Plan and SMC. All future development under this alternative would be subject to a site-specific review that considers consistency with all applicable plans,

including the updated TCSP and ALUCP. The ALUC may determine a safety concern during future review of projects under the Increased Density/Transit Oriented Design Alternative and a significant land use conflict may result. Therefore, impacts related to land use under the Increased Density/Transit Oriented Design Alternative would be less than significant, similar to the project.

l. Noise

Future development under the Increased Density/Transit Oriented Design Alternative would be subject to the updated TCSP, as well as the City's General Plan and SMC. This alternative is estimated to result in an additional 1,515 du in the TCSP area and AEN compared to the project, which would not allow residential in the Trolley Commercial land use. Future development under the Increased Density/Transit Oriented Design Alternative would be subject to implementation of mitigation measures documented in this EIR for noise, which would reduce noise impacts to less than significant. Allowing residential development in the Trolley Commercial land use under the Increased Density/Transit Oriented Design Alternative would not increase noise; however, it would also not avoid potentially significant noise impacts associated with construction and stationary sources and outdoor performances. Therefore, impacts related to noise under the Increased Density/Transit Oriented Design Alternative would be significant and unavoidable and have similar impacts compared to the project.

m. Population and Housing

Future development under the Increased Density/Transit Oriented Design Alternative would be located in areas that are already served by infrastructure as identified in the existing TCSP, and therefore would not induce population growth. While there would be increased residential development in the TCSP area, the Increased Density/Transit Oriented Design Alternative would not displace a substantial number of people or housing as the Trolley Commercial area does not include residential development under existing conditions. Therefore, impacts associated with population and housing would be less than significant, similar to the project.

n. Public Services

Future development under the Increased Density/Transit Oriented Design Alternative would not result in increased demand to require construction of new fire protection, police protection, school, or library facilities, since each future development would pay its fair share toward anticipated facility needs. Construction of any future public service facilities would require a separate environmental review and approval. Therefore, impacts associated with public services would be less than significant, similar to the project.

o. Recreation

Future development under the Increased Density/Transit Oriented Design Alternative would be located in areas that are already served by infrastructure as identified in the existing TCSP, and therefore would not result in increased demand to require construction of new recreational facilities since each incremental housing development would pay its fair share toward anticipated facility needs. Construction of any future recreation facilities would require a separate environmental review and approval. Therefore, impacts associated with recreation would be less than significant, similar to the project.

p. Transportation

Future development under the Increased Density/Transit Oriented Design Alternative would occur pursuant to the City's updated TCSP, as well as the City's General Plan and SMC. While there would be more residential development in the TCSP area, the additional development is located near transit and would be within a TPA. The Increased Density/Transit Oriented Design Alternative would include the roadway improvements identified in the updated TCSP. Future development would be designed consistent with established roadway design standards, and access to the existing roadway network would be configured consistent with established roadway design standards that would allow for emergency access. Although the Increased Density/Transit Oriented Design Alternative would provide more transit oriented development opportunities in TPAs located within the TCSP, this alternative applies the same land use densities and intensities in the majority of the project area, including within those in areas outside of TPAs, resulting in a similar potential for VMT impacts to occur. Therefore, impacts associated with transportation under the Increased Density/Transit Oriented Design Alternative would be significant and unavoidable, similar to the project.

q. Tribal Cultural Resources

The Increased Density/Transit Oriented Design Alternative would result in additional residential development in the Trolley Commercial land use designation in the southern part of the TCSP area and AEN. The Trolley Commercial land use is in a culturally sensitive area that could also be a tribal cultural resource. Development consistent with the updated TCSP could still occur in other culturally sensitive areas that could result in tribal cultural resources impacts. Future development under this alternative would be required to implement mitigation measures documented in this EIR for tribal cultural resources. As described in Section 4.17, the project would result in less than significant tribal cultural resources impacts with mitigation incorporated. Therefore, impacts related to tribal cultural resources under

the Increased Density/Transit Oriented Design Alternative would be less than significant with mitigation, similar to the project.

r. Utilities and Service Systems

Future development under the Increased Density/Transit Oriented Design Alternative would be subject to the updated TCSP land use plan and zoning, development and design standards, and conceptual designs provided in the updated TCSP. Development under this alternative would involve 1,515 du more than the project and would result in some increase demand for utilities and services. Utility infrastructure improvements and relocations under the Increased Density/Transit Oriented Design Alternative would be evaluated as part of a future review for site-specific projects. Should separate utility extensions be required outside of the footprints of future site-specific projects, they would require an environmental review and compliance with regulations in existence at that time would address potential environmental impacts. The Increased Density/Transit Oriented Design Alternative would likely result in some increase in demand for water supply, wastewater treatment, and solid waste disposal compared to development proposed under the project. Therefore, impacts associated with utilities and service system would be less than significant with mitigation, greater than the project.

s. Wildfire

Future development under the Increased Density/Transit Oriented Design Alternative would be subject to the updated TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would be subject to the development and design standards and conceptual designs provided in the updated TCSP. This alternative does not include land use changes that would impair implementation of or physically interfere with the City's emergency response plan, evacuation routes, or conflict with any of the Multi-Jurisdictional Hazard Mitigation Plan specific hazard mitigation goals, objectives, and related actions. Additionally, future development would be required to adhere to the City's General Plan (Safety Element) policies including 4.2, 4.3, 4.4, 4.11, and 4.12 which address emergency response and emergency evacuation. Future development located within the Wildland Urban Interface would comply with applicable California Fire Code and City General Plan requirements and include enhanced fire protection measures as detailed in the City's building and fire codes. Future development under this alternative would also be required to comply with applicable regulations and policies related to flooding, drainage patterns, and landslides. Therefore, impacts associated with wildfire under the Increased Density/Transit Oriented Design Alternative would be less than significant, similar to the project.

As described above, the Increased Density/Transit Oriented Design Alternative would result in similar impacts compared to the project, with a slight increase in the severity of impacts for air quality, GHGs, and utilities and service systems. Under the Increased Density/Transit Oriented Design Alternative, most of the updated TCSP under the project would be the same; however, the Trolley Commercial land use areas in the central part of the TCSP area and AEN would include residential development estimated to include 1,515 du. Therefore, less than significant impacts (with and without mitigation) associated with aesthetics, agricultural resources, biological resources, cultural resources, energy, geology and soils, hydrology and water quality, population and housing, public services, recreation, tribal cultural resources, utilities and service systems, and wildfire would be similar under the Increased Density/Transit Oriented Design Alternative compared to the project.

Attainment of Project Objectives: This alternative would partially meet some of the project objectives stated in Chapter 3.0, Project Description, as this alternative does provide for mobility needs, a variety of housing types and commercial and office/professional opportunities, including employment-supportive uses. However, this alternative would not substantially avoid or reduce the project's environmental impacts.

Finding: The City Council rejects Alternative 3: Increased Density Project Alternative, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternative only partially meets the Project objectives; and (2) the alternative fails to avoid or reduce the Project's significant and unavoidable impacts relating to air quality, hazards, land use and planning, noise and transportation.

4. No Outdoor Performance Use Alternative

Description: The No Outdoor Performance Use Alternative represents a modified update to the TCSP to avoid some of the noise impacts identified for the project. Under this alternative outdoor performance uses would not be allowed within the Commercial Entertainment areas of the TCSP, north of the Town Center Transit Station, and would avoid an operational noise impact associated with outdoor gatherings of people for artistic, cinematic, theatrical, musical, sporting events, cultural, education or civic purposes. The remaining aspects of the proposed TCSP, including the expansion of the TCSP area and AEN, updated development standards, proposed roadway network upgrades and roadway connections or associated pedestrian and bicycle improvements, and conceptual development plans and design standards for Housing Element sites 16A, 16B, 20A, and 20B, would remain as they are in the proposed project. (Draft PEIR, p. 9-24

Impacts:

a. Aesthetics

Under the No Outdoor Performance Use Alternative, development within the TCSP area, AEN, and Housing Element sites would be similar to the proposed TCSP under the project, except that outdoor performance uses would not be allowed within the Commercial Entertainment areas of the TCSP, north of the Town Center Transit Station. All other requirements related to aesthetics as discussed throughout this section for the other alternatives would apply to this alternative, and a mitigation measure identified to address potential impacts to the Edgemoor Polo Barn near Housing Element sites 20A and 20B (MM CUL-5) would be implemented under the No Outdoor Performance Use Alternative as there would be no changes to the project near Housing Element sites 20A and 20B. Potentially significant aesthetics impacts under the No Outdoor Performance Use Alternative would be similar to the project as the potential for development of Housing Element sites 20A and 20B has the potential to damage views of an historic resource at the Edgemoor Polo Barn.

b. Agricultural Resources

Under the No Outdoor Performance Use Alternative, development within the TCSP area, AEN, and Housing Element sites would be similar to the proposed TCSP under the project, except that outdoor performance uses would not be allowed within the Commercial Entertainment areas of the TCSP, north of the Town Center Transit Station. Areas identified as Farmland of Local Importance in the TCSP area and AEN would still be developed and similarly result in less than significant impacts as these areas are identified for development and do not contain active agricultural uses. Therefore, impacts associated with agriculture and forestry resources under the No Outdoor Performance Use Alternative would be less than significant and similar to the project.

c. Air Quality

The updated TCSP under the No Outdoor Performance Use Alternative would be subject to the development standards in the updated TCSP, as well as the City's General Plan and SMC. As there would be no change in overall development under this alternative, the No Outdoor Performance Use Alternative would be consistent with the existing growth projections for which RAQS are based. Development potential would be similar compared to the project. Construction time frames and equipment for site-specific development projects are not available at this time, and there is a potential for multiple development projects to be constructed at one time, resulting in significant construction-related emissions. While future development under

this alternative would be required to implement air quality mitigation measures documented in the EIR, mitigation for air quality impacts would remain significant and unavoidable. Therefore, impacts associated with air quality under the No Outdoor Performance Use Alternative would be significant and unavoidable, similar to the project.

d. Biological Resources

Under the No Outdoor Performance Use Alternative, development within the TCSP area, AEN, and Housing Element sites would be similar to the proposed TCSP under the project, except that outdoor performance uses would not be allowed within the Commercial Entertainment areas of the TCSP, north of the Town Center Transit Station.

Future development under the No Outdoor Performance Use Alternative would be subject to implementation of mitigation measures documented in this EIR for biological resources, which would reduce impacts related to sensitive species, sensitive habitats, and wetlands to a level less than significant. Applicable federal, state, and local regulations would also apply, such as the FESA, MBTA, CFG Code, and San Diego County MSCP. Restricting outdoor performance use would reduce noise levels in the TCSP area and would reduce the potential for noise to result in biological resources impacts associated with outdoor performances. Therefore, impacts related to biological resources under the No Outdoor Performance Use Alternative would be less than significant with mitigation and would have less impacts compared to the project.

e. Cultural Resources

The updated TCSP under the No Outdoor Performance Use Alternative would result in not allowing outdoor performance uses within the Commercial Entertainment areas of the TCSP, north of the Town Center Transit Station. This alternative would not avoid impacts to culturally sensitive areas and development under the Increased Density/Transit Oriented Design Alternative still occur within areas that support sensitive cultural resources.

Future development under the No Outdoor Performance Use Alternative would occur pursuant to the City's adopted TCSP, as well as the City's General Plan and SMC. Future development under this alternative would be required to implement mitigation measures documented in this EIR for cultural resources. As described in Section 4.5, the project would result in less than significant cultural resources impacts with mitigation incorporated. Both the No Outdoor Performance Use Alternative and the proposed project would similarly result in potential impacts on historic resources due to the proximity of Housing Element sites 20A and 20B to the Edgemoor Polo Barn. Therefore, impacts related to cultural resources under the No Outdoor

Performance Use Alternative would be less than significant with mitigation, similar to the project.

f. Energy

Future development under the No Outdoor Performance Use Alternative would be subject to the updated TCSP land use plan and zoning, as well as the City's General Plan and SMC, and would be subject to the development and design standards and conceptual designs provided in the updated TCSP. Future development under the No Outdoor Performance Use Alternative would not result in increased energy use compared to the project as overall buildout of the TCSP area would remain and would not conflict with energy plans or result in wasteful or inefficient energy use. Impacts associated with energy would be less than significant, similar to the project.

g. Geology and Soils

Future development under the No Outdoor Performance Use Alternative would be subject to the City's updated development and design standards and conceptual designs provided in the updated TCSP, as well as the City's General Plan and SMC. The No Outdoor Performance Use Alternative would support development consistent with the updated TCSP which could be subject to potential geologic hazards. Adherence to Safety Element policies, the SMC, and the CBC would ensure that future development under this alternative would not cause substantial adverse effects associated with fault rupture, ground shaking, liquefaction, landslide, or expansive soils, and impacts would be less than significant. Similarly, adherence to applicable SMC requirements would ensure that future development under this alternative would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant. Implementation of mitigation measures documented in this EIR for paleontological resources would reduce impacts related to paleontological resources to a level less than significant. Therefore, impacts related to geology and soils under the No Outdoor Performance Use Alternative would be mitigated to a level less than significant, similar to the project.

h. Greenhouse Gas Emissions

Future development under the No Outdoor Performance Use Alternative would result in a similar level and type of development throughout the TCSP, except outdoor performances would not be allowed within the Commercial Entertainment areas of the TCSP. Like the proposed project, development would be subject to the City's updated development and design standards and conceptual designs provided in the updated TCSP, as well as the City's General Plan and SMC. Future development under the No Outdoor Performance Use Alternative would also be subject to implementation of the

City's Sustainable Santee Plan (Climate Action Plan). The project would result in less than significant GHG impacts with mitigation and impacts associated with GHG under the No Outdoor Performance Use Alternative would also be less than significant with mitigation, similar to the project.

i. Hazards and Hazardous Materials

The updated TCSP under the No Outdoor Performance Use Alternative would result in not allowing outdoor performance uses within the Commercial Entertainment areas of the TCSP, north of the Town Center Transit Station. Like the proposed project, all other future development would be required to adhere to multiple regulations related to hazardous materials handling and transport, including applicable state and local regulatory measures. Citywide General Plan Safety Element policies would also support safe handling of hazardous materials. Future development under this alternative would be required to implement mitigation measures documented in this EIR for hazardous materials. Future development under this alternative located within the Gillespie Field and MCAS Miramar ALUCPs would be required to adhere to applicable City policies and regulations, as well as policies of the ALUCP. Furthermore, applications for all future projects under the No Outdoor Performance Use Alternative would be reviewed and approved by the Santee Fire Department prior to issuance of a building permit. Therefore, impacts associated with hazards and hazardous materials under the No Outdoor Performance Use Alternative would be mitigated to a level less than significant, similar to the project.

j. Hydrology and Water Quality

The updated TCSP under the No Outdoor Performance Use Alternative would result in not allowing outdoor performance uses within the Commercial Entertainment areas of the TCSP, north of the Town Center Transit Station. Overall buildout and development intensity is anticipated to be the same as the proposed project. Future development under the No Outdoor Performance Use Alternative would be required to adhere to all applicable water quality standards as provided in various water quality regulations and plans including all pertinent requirements of the City's Jurisdictional Runoff Management Plan, BMP Design Manual, NPDES General Construction Permit, as well as all regulations related to water quality. Both redevelopment and new development on vacant sites would be required to comply with applicable stormwater management requirements which focus on retention and infiltration of waters on-site. Additionally, development under this alternative would be required to comply with City General Plan policies and regulations that prioritize infiltration and treatment of stormwater. Future development would also be required to implement applicable stormwater BMPs and erosion control measures to retain flows on-site and minimize the velocity of stormwater runoff. Such BMPs could include on-site drainage

swales, bioretention features, use of permeable pavers in parking areas and streets, or infiltration basins which also serve as a means for pollutant removal. Development under this alternative would be required to adhere to all state and local development regulations including SMC (Chapter 11.36), which establishes Flood Damage Prevention standards. Therefore, impacts associated with hydrology and water quality under the No Outdoor Performance Use Alternative would be less than significant, similar to the project.

k. Land Use and Planning

The updated TCSP under the No Outdoor Performance Use Alternative would result in the prohibition of outdoor performance uses in the TCSP area and AEN. Overall buildout and development intensity is anticipated to be the same under this alternative and the proposed project. Future development under the No Outdoor Performance Use Alternative would be subject to the City's updated development and design standards and conceptual designs provided in the updated TCSP, as well as the City's General Plan and SMC. All future development under this alternative would be subject to a site-specific review that considers consistency with all applicable plans, including the updated TCSP and ALUCP. The ALUC may determine a safety concern during future review of projects under the No Outdoor Performance Use Alternative and a significant land use conflict may result. Therefore, impacts related to land use under the No Outdoor Performance Use Alternative would be significant and unavoidable, similar to the project..

l. Noise

The updated TCSP under the No Outdoor Performance Use Alternative would not allow outdoor performance uses within the Commercial Entertainment areas of the TCSP, north of the Town Center Transit Station. Future development under the No Outdoor Performance Use Alternative would be subject to the updated TCSP, as well as the City's General Plan and SMC. Future development under the No Outdoor Performance Use Alternative would be subject to implementation of mitigation measures documented in this EIR for noise, which would reduce noise impacts related to less than significant. Restricting outdoor performance uses under the No Outdoor Performance Use Alternative would avoid potentially significant noise impacts associated with outdoor performances (NOI-3). Other noise impacts under the project would remain under this alternative. Therefore, impacts related to noise under the No Outdoor Performance Use Alternative would be less than significant with mitigation and have reduced impacts compared to the project.

m. Population and Housing

Future development under the No Outdoor Performance Use Alternative would be located in areas that are already served by infrastructure as identified in the existing TCSP, and therefore would not induce population growth. Buildout under this alternative would not be reduced compared to the project. The No Outdoor Performance Use Alternative would not displace a substantial number of people or housing. Therefore, impacts associated with population and housing would be less than significant, similar to the project.

n. Public Services

Future development under the No Outdoor Performance Use Alternative would not result in increased demand to require construction of new fire protection, police protection, school, or library facilities, since each future development would pay its fair share toward anticipated facility needs. Construction of any future public service facilities would require a separate environmental review and approval. Therefore, impacts associated with public services would be less than significant, similar to the project.

o. Recreation

Future development under the No Outdoor Performance Use Alternative would be located in areas that are already served by infrastructure as identified in the existing TCSP, and therefore would not result in increased demand to require construction of new recreational facilities since each incremental housing development would pay its fair share toward anticipated facility needs. Construction of any future recreation facilities would require a separate environmental review and approval. Therefore, impacts associated with recreation would be less than significant, similar to the project.

p. Transportation

Future development under the No Outdoor Performance Use Alternative would occur pursuant to the City's updated TCSP, as well as the City's General Plan and SMC. While there would be outdoor performance uses, buildout under this alternative would not be reduced compared to the project and traffic levels would not change. The No Outdoor Performance Use Alternative would include the roadway improvements identified in the updated TCSP. Future development would be designed consistent with established roadway design standards, and access to the existing roadway network would be configured consistent with established roadway design standards that would allow for emergency access. Because the No Outdoor Performance Use Alternative applies the same land use densities and intensities in the majority of the project area, including within those areas

located outside of TPAs, significant VMT impacts could occur. Therefore, impacts associated with transportation would be significant and unavoidable, similar to the project.

q. Tribal Cultural Resources

The updated TCSP under the No Outdoor Performance Use Alternative would result in not allowing outdoor performance uses within the Commercial Entertainment areas of the TCSP, north of the Town Center Transit Station. Future development under the No Outdoor Performance Use Alternative would occur pursuant to the City's adopted TCSP, as well as the City's General Plan and SMC. Future development under this alternative would be required to implement mitigation measures documented in this EIR for tribal cultural resources. As described in Section 4.17, the project would result in less than significant tribal cultural resources impacts with mitigation incorporated. The No Outdoor Performance Use Alternative would not include the River Bridge which is located within an area identified for moderate potential to contain eligible buried archaeological sites, and the potential for tribal cultural resources impacts would be slightly reduced. Therefore, impacts related to tribal cultural resources under the No Outdoor Performance Use Alternative would be less than significant with mitigation, similar to the project.

r. Utilities and Service Systems

Future development under the No Outdoor Performance Use Alternative would be subject to the updated TCSP land use plan and zoning, development and design standards, and conceptual designs provided in the updated TCSP. Development under this alternative, like the project, would increase demand for utilities and services. Utility infrastructure improvements and relocations under the No Outdoor Performance Use Alternative would be evaluated as part of a future review for site-specific projects. Should separate utility extensions be required outside of the footprints of future site-specific projects, they would require an environmental review and compliance with regulations in existence at that time would address potential environmental impacts. The No Outdoor Performance Use Alternative would likely result in similar demand for water supply, wastewater treatment, and solid waste disposal compared to development proposed under the project. Therefore, impacts associated with utilities and service system would be less than significant with mitigation, similar to the project.

s. Wildfire

Future development under the No Outdoor Performance Use Alternative would be subject to the updated TCSP land use plan and zoning, as well as

the City's General Plan and SMC, and would be subject to the development and design standards and conceptual designs provided in the updated TCSP. This alternative does not include land use changes that would impair implementation of or physically interfere with the City's emergency response plan, evacuation routes, or conflict with any of the Multi-Jurisdictional Hazard Mitigation Plan specific hazard mitigation goals, objectives, and related actions. Additionally, future development would be required to adhere to the City's General Plan (Safety Element) policies including 4.2, 4.3, 4.4, 4.11, and 4.12 which address emergency response and emergency evacuation. Future development located within the Wildland Urban Interface would comply with applicable California Fire Code and City General Plan requirements and include enhanced fire protection measures as detailed in the City's building and fire codes. Future development under this alternative would also be required to comply with applicable regulations and policies related to flooding, drainage patterns, and landslides. Therefore, impacts associated with wildfire under the No Outdoor Performance Use Alternative would be less than significant, similar to the project.

As described above, the No Outdoor Performance Use Alternative would result in similar impacts compared to the project, with none of the environmental resources seeing an increase in the severity of impacts. Under the No Outdoor Performance Use Alternative, most of the updated TCSP under the project would be similar; however, the updated TCSP would not allow outdoor performance uses within the Commercial Entertainment areas of the TCSP, north of the Town Center Transit Station. Therefore, less than significant impacts (with and without mitigation) associated with aesthetics, agricultural resources, air quality, cultural resources, energy, geology, and soils, GHGs, hydrology population and housing, public services, recreation, tribal cultural resources, utilities and service systems, and wildfire would be similar under the No Outdoor Performance Use Alternative compared to the project. Impacts to biological resources would be slightly reduced under this alternative due to the elimination of outdoor performance uses near areas of biological sensitivity and a noise impact associated with outdoor performances would be avoided. Impacts related to air quality, hazards and hazardous materials, land use and planning, noise, and transportation would remain significant and unavoidable, similar to the project.

Attainment of Project Objectives: This alternative would partially meet some of the project objectives stated in Chapter 3.0 as this alternative does provide for mobility needs, a variety of housing types and commercial and office/professional opportunities, including employment-supportive uses. This alternative would not fully meet the project objectives to create a variety of commercial services to establish the TCSP area as an activity center of the community and to create community-serving public and civic uses within the TCSP as it would reduce opportunities to provide outdoor activities.

Finding: The City Council rejects Alternative 4: No Outdoor Performance Use

Alternative, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternative only partially meets the Project objectives; and (2) the alternative fails to avoid or reduce the Project's significant and unavoidable impacts relating to air quality, hazards, land use and planning, noise and transportation.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives. The project itself may not be identified as the environmentally superior alternative. The No Outdoor Performance Use Alternative would be the environmentally superior alternative because it would incrementally reduce significant impacts associated with biological resources and would avoid a noise impact compared to the project. Although this alternative would provide less flexibility for potential outdoor uses, the No Outdoor Performance Use Alternative would ultimately result in development of the same amount of residential and non-residential development as the project as no other aspects of the TCSP would be altered. The No Outdoor Performance Use would meet most project objectives; however, it might not as fully meet the project objective to allow for community-serving, civic, and public uses within the TCSP area to become focal points for residents and visitors to enjoy. (Draft PEIR, p. 9-31)

SECTION IX.
ADOPTION OF STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to State CEQA Guidelines Section 15093(a), the City Council must balance, as applicable, the economic, legal, social, technological, or other benefits of the Project against its unavoidable environmental risks in determining whether to approve the project. If the specific benefits of the project outweigh the unavoidable adverse environmental effects, those environmental effects may be considered acceptable.

Having reduced the adverse significant environmental effects of the Project to the extent feasible by adopting the mitigation measures; having considered the entire administrative record on the project; the City Council has weighed the benefits of the Project against its unavoidable adverse CEQA impacts after mitigation in regards to air quality, land use compatibility, airport hazards and transportation/traffic. While recognizing that the unavoidable adverse impacts are significant under CEQA thresholds, the City Council nonetheless finds that the unavoidable adverse impacts that will result from the Project are acceptable and outweighed by specific social, economic, and other benefits of the Project.

In making this determination, the factors and public benefits specified below were considered. Any one of these reasons is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the City Council would be able to stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and in the documents found in the Records of Proceeding.

The City Council therefore finds that for each of the significant impacts which are subject to a finding under CEQA Section 21081(a)(3), that each of the following social, economic, and environmental benefits of the Project, independent of the other benefits, outweigh the potential significant unavoidable adverse impacts and render acceptable each and every one of these unavoidable adverse environmental impacts:

A. Establish standards that encourage new development and redevelopment of the TCSP area as an active town center with integrated, well-designed and interconnected commercial, residential, public and civic uses.

B. Implement Program 9 of the 6th Cycle 2021-2029 Housing Element to provide for the opportunity for future residential development on various sites throughout the City as identified by the Sites Inventory, with a density range of 30 to 36 dwelling units per acre (du/ac) on selected sites.

C. Increase the City of Santee's (City) overall housing capacity and capability to accommodate housing as required per the adopted Housing Element for the 2021-2029 housing cycle.

D. Enforce objective design standards that facilitate the development of affordable housing, encourage distinct neighborhoods, provide enhanced connections between homes, activity centers, shopping, and open space opportunities, and ensure quality development occurs that is sensitive to the existing environment and surrounding uses.