Draft General Plan Final Project Environmental Impact Report (PEIR) Recommended Revisions

The Final PEIR, dated September 28, 2007, was previously distributed and is available on the City's web site at http: //www.sandiego.gov/planning/genplan/peir.shtml.

- Consistent with CEQA Section 15097, the General Plan policies have been incorporated into the PEIR MMRP. Subsequent to the finalization of the PEIR, edits have been made to the draft General Plan policies (Please see Attachment 3). The final edited policies will be incorporated into the final PEIR.

- In addition, the following Historical and Paleontology project-level MMRPs from the body of the Final PEIR have been updated with the edits shown in double strikeout/underline.

- The revisions to the project and program-level MMRPs serve to clarify and amplify the mitigation within the General Plan PEIR, and do not result in the identification of new or increased environmental impacts requiring the recirculation of the PEIR per CEQA Section 15088.5.

Archaeological MMRP (PEIR pages 3.6-26 – 3.6-33)

I. Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check.

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD.

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.

2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project.

3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search.

1. The PI shall provide verification to MMC that a site specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

B. PI <u>and Native American Monitor</u> Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
   a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored
   Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation). <u>MMC shall notify that PI that the AME has been approved.</u>

3. When Monitoring Will Occur
   a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur. <u>The Native American monitor shall determine the extent of their presence during construction related activities based on the AME and provide that information to the PI and MMC.</u>

b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching.

1. The Archaeological monitor shall be present full-time during grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Native American monitor shall determine the extent of their presence during construction related activities based on the AME and provide that information to the PI and MMC. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.**

2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion)**, and in the case of ANY discoveries. The RE shall forward copies to MMC.

3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered may reduce or increase the potential for resources to be present.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI and Native American Monitor ~~representative, if applicable,~~ shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below:

a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.

b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.

c. If resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and the following procedures as set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS).

2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.

2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.

3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains **ARE** determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.

~~2. The NAHC will contact the PI within 24 hours or sooner, after Medical Examiner has completed coordination.~~

~~3. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.~~
~~4. The PI shall coordinate with the MLD for additional consultation.~~
~~5. The MLD has 48 hours to make recommendations to the property owner or representative for the treatment or disposition, with proper dignity, of the human remains and associated grave goods.~~
~~6. Disposition of Native American Human Remains shall be determined between the MLD and the PI, IF:~~
   ~~a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;~~
   ~~b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner.~~
   ~~c. To protect these sites, the landowner shall do one or more of the following:~~
      ~~(1) Record the site with the NAHC;~~
      ~~(2) Record an open space or conservation easement; or~~
      ~~(3) Record a document with the County.~~
   ~~d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 6.c., above.~~

2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.

3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with the California Public Resource and Health & Safety Codes.

4. The MLD has 48 hours to make recommendations to the property owner or representative for the treatment or disposition, with proper dignity, of the human remains and associated grave goods.

5. Disposition of Native American Human Remains shall be determined between the MLD and the PI, IF:

   a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;

b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner.

c. To protect these sites, the landowner shall do one or more of the following:
   (1) Record the site with the NAHC;
   (2) Record an open space or conservation easement; or
   (3) Record a document with the County.

d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 6.c., above.

D. If Human Remains are **NOT** Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.

2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).

3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner and the Museum of Man.

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V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.

2. The following procedures shall be followed.
   a. No Discoveries
      In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8AM ~~9am the following morning~~ of the next business day.

b. Discoveries
All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains.

c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

d. The PI shall immediately contact MMC, or by 8AM of the next business day~~the following morning~~ to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
   a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.

   b. Recording Sites with State of California Department of Parks and Recreation
   The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Monitoring Report to MMC for approval.

4. MMC shall provide written verification to the PI of the approved report.

5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.

2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.

2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.

2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

Paleontology MMRP (PEIR pages 3.11-9 – 3.11-12)

I. Prior to Permit Issuance

A. Environmental Review Manager (ERM) Plan Check.

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the ERM Environmental designee shall verify

that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ERM.
   1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.

   2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.

   3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search.
   1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

   2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings.
   1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
      a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

   2. Identify Areas to be Monitored.
      Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.

The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur.
   a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

   b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching.
   1. The monitor shall be present full time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.**

   2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion)**, and in the case of ANY discoveries. The RE shall forward copies to MMC.

   3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

B. Discovery Notification Process.
   1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.

   2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance.
1. The PI shall evaluate the significance of the resource.
   a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.

   b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.

   c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.

   d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night Work <u>and/or Weekend Work</u>

A. If night <u>and/or weekend</u> work is included in the contract.
1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.

2. The following procedures shall be followed.
   a. No Discoveries
   In the event that no discoveries were encountered during night work, The PI shall record the information on the CSVR and submit to MMC via fax by <u>8 a.m.</u>~~9:00 a.m.~~ the following morning, if possible.

   b. Discoveries
   All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.

   c. Potentially Significant Discoveries
   If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

d. The PI shall immediately contact MMC, or by 8:00 a.m. the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction.
   1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

   2. The RE or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report.
   1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) prepared in accordance with the Paleontology Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
      a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.

      b. Recording Sites with the San Diego Natural History Museum
         The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

   2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

   3. The PI shall submit revised Draft Monitoring Report to MMC for approval.

   4. MMC shall provide written verification to the PI of the approved report.

   5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains.
   1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.

2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

C. Curation of fossil remains: Deed of Gift and Acceptance Verification.
   1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.

   2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s).
   1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.

   2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

CANDIDATE FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS REGARDING THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE SAN DIEGO GENERAL PLAN UPDATE

I. INTRODUCTION

The following Findings and Statement of Overriding Considerations are made for the San Diego General Plan Update (hereinafter referred to as the "PROJECT"). The environmental effects of the PROJECT are addressed in a Program EIR (Project No. 104495 /SCH No. 2006091032), dated April 25, 2007, which is incorporated by reference herein. As stated in the Additional Information Statement (AIS) to the EIR, dated April 26, 2007, the environmental impacts associated with the implementation of the PROJECT will be significant and unavoidable.

While the PEIR analyzed Draft General Plan policies designed to promote smart growth, sustainability, and environmentally responsible development, the environmental impacts associated with the implementation of the Draft General Plan were found to be significant and unavoidable in all issue areas. This determination was made not because the policies themselves are considered harmful to the environment, but because there is uncertainty related to future implementation through community plan land use designations, applied zoning, and proposed development. Since the degree of impact and applicability, feasibility, and success of mitigation framework measures cannot be adequately known for each future specific development project at the program level of analysis, program level impacts were called out as significant and unavoidable. The PEIR concludes that the full impacts of any future specific development project under the General Plan can only be determined at the project level of analysis.

The California Environmental Quality Act (CEQA) (California Public Resources Code §21000 *et. seq.* and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 *et. seq*.) require that no public agency shall approve or carry out a project which identifies one or more significant 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. The possible findings are:

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

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

(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 EIR (CEQA, §21081(a); Guidelines, §15091(a)).

CEQA requires that the findings made pursuant to §15091 shall be supported by substantial evidence in the record. Under CEQA, substantial evidence means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (Guidelines, §15384).

CEQA also requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental effects when determining whether to approve the project. If specific benefits of a proposed project outweigh the unavoidable adverse environmental effects, the effects may be considered "acceptable" (Guidelines, §15091(a)). CEQA further require that, where the decision of the public agency allows the occurrence of significant effects which are identified in the EIR, but are not at least substantially mitigated, the agency shall state in writing the specific reasons to support its action based on the EIR and/or other information in the record. This statement of overriding considerations shall be supported by substantial evidence in the record and does not substitute for, and shall be in addition to, findings required pursuant to §15091. (Guidelines, §15093(b) and (c).)

The following Findings and Statement of Overriding Considerations have been submitted by the applicant as candidate findings to be made by the decision-making body. The Environmental Analysis Section of the Development Services Department does not recommend that the discretionary body adopt or reject these findings. They are attached to allow readers of this report an opportunity to review potential reasons for approving the PROJECT despite the significant and unavoidable effects identified in the Final EIR.

II. PROJECT DESCRIPTION AND PURPOSE

The City of San Diego's October 2006 Draft General Plan (Draft General Plan) is the proposed PROJECT. The PROJECT sets out a long-range vision and comprehensive policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego over the next 20 to 30 years. The preparation of the PROJECT has been guided by the "City of Villages" growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element (SFE) adopted by the City Council on October 22, 2002. Because less than four percent of the City's land remains vacant, the PROJECT represents a shift in focus from how to develop vacant land to how to reinvest in existing communities as described with the City of Villages strategy. Therefore, the City has drafted new policies and programs to support changes in development patterns to emphasize combining housing, shopping, employment uses, schools, and civic uses, at different scales, in village centers.

The City of Villages strategy will continue to help meet the long-term needs of the City through the incremental redevelopment of aging buildings and sites. The City's communities already have districts of different scales, many with village-like neighborhoods that will continue to evolve. A common feature of all the villages will be the addition of vibrant public places and the increased ease of walking between residences, transit stops, public facilities, and basic commercial uses. As

the villages become more fully developed, their individual personalities will become more defined and their development patterns will become more varied and distinctive. By directing growth primarily toward village centers, the strategy in the PROJECT works to preserve established residential neighborhoods and manage the City's growth over the long term. The City has developed the PROJECT within the context of state planning requirements, regional plans and population projections, and the issues and needs unique to the City of San Diego. As a result, the PROJECT establishes guiding principles and primary goals and objectives to achieve:

- An open space network formed by parks, canyons, river valleys, habitats, beaches, and ocean;
- Diverse residential communities formed by the open space network;
- Compact and walkable mixed-use villages of different scales within communities;
- Employment centers for a strong economy;
- An integrated regional transportation network of transit, roadways, and freeways that efficiently links communities and villages to each other and to employment centers;
- High quality and well-maintained public facilities to serve the City's population, workers, and visitors;
- Historic districts and sites that respect our heritage;
- Balanced communities that offer opportunities for all San Diegans and share citywide responsibilities;
- A clean and sustainable environment; and,
- A high aesthetic standard.

The rate at which the City of Villages concept can be applied throughout the City will be determined largely by market demand, public support, and the rate at which infrastructure deficiencies can be remedied. For example, as urban area transit service is improved, many potential village locations could begin to develop in accordance with the City of Villages concept. However, even if transit deficiencies and other infrastructure needs are fully addressed in the next two decades, it is likely that the transition from the current auto-oriented pattern of development to a more diversified pattern built with transit- and pedestrian-orientation will take many years to be fully achieved, which would extend beyond the lifetime of the PROJECT. Another significant factor that will influence the pace at which the City of Villages strategy will be implemented is the rate of future population growth in the San Diego region. Furthermore, specific demographic trends such as an increasing elderly population or other demographic group that cannot or prefer not to drive will increase the demand for mixed-use, mixed-income neighborhoods that are accessible by transit or walking to a full-range of services and facilities. It should also be noted that future environmental, political, and economic conditions and other factors that cannot be predicted at the present time could affect the rate and scale of San Diego's growth and development.

The PROJECT provides a broad range of citywide policies that affect land development, though these policies are only intended to provide the foundation for specific community plan updates to be used in the processing of discretionary projects and to provide direction for public projects, master plans, and other implementation programs. The PROJECT and community plans are to play complementary roles to ensure that quality of life is maintained, essential community

character is respected, and that public facilities are provided. Because the City of San Diego is so large and diverse, the PROJECT does not provide location specific recommendations. It is the role of the community plans (as a part of the Land Use and Community Planning Element of the PROJECT) to provide site-specific policies and recommendations. While community plans are in the process of being updated, there may be instances where the policies of the community plan and the PROJECT are not fully aligned. However, currently there are no land use or zoning inconsistencies between the PROJECT and community plans because the PROJECT does not change community plan land use designations. The community plans are the final arbiter on issues of land use, density, and intensity.

Other major implementation initiatives include the Public Facilities Financing Strategy, Economic Development Strategic Plan, Parks Master Plan, and other master plans and strategies. Master plans and strategies offer more in depth analysis and implementation actions associated with their topic areas than is desirable in the PROJECT. However, the formation or amendment of such plans will be evaluated against the policies of the PROJECT. There are also specific legislative, regulatory, administrative, and collaborative implementation actions that will be needed. The PROJECT and the associated Action Plan will be monitored to measure its effectiveness in achieving goals. The General Plan Monitoring Report, initially prepared in 2004, measures progress through: 1) the Action Plan item implementation tracking 2) San Diego Sustainable Community Program Indicators, and 3) community economic indicators. It is expected that environmental review of future discretionary actions may tier from the Program EIR, although separate environmental analysis pursuant to CEQA will not be required for the Action Plan or Monitoring Report. Approval of the PROJECT and certification of the PEIR does not authorize any physical development beyond that allowed by existing plans and ordinances.

The PROJECT would replace the Strategic Framework Element and the *Progress Guide and General Plan* (1979). When the Strategic Framework Element was adopted, there was an associated Five-Year Action Plan that outlined specific actions needed to implement the new Element. A new Action Plan is being prepared to correspond to the elements of the updated General Plan. The PROJECT is comprised of a new Strategic Framework section and the following nine elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; Noise; and Historic Preservation. In addition to the elements listed above, the Housing Element is also a mandatory element that is part of the General Plan. However, the City of San Diego's Housing Element 2005-2010 is under separate cover and was adopted by City Council on December 5, 2006.

III. ISSUES ADDRESSED IN EIR

The EIR contains an environmental analysis of the potential impacts associated with implementing the PROJECT. All major environmental topics addressed in the EIR were determined to be significant and unavoidable based on review by the City of San Diego. These topics included: agricultural resources, air quality, biological resources, geologic conditions, health and safety, historical resources, hydrology, land use, mineral resources, noise,

paleontological resources, population and housing, public services and facilities, public utilities, transportation/traffic circulation/parking, visual effects and neighborhood character, water supply and quality, growth inducement, and global warming. However, certain issues under the topics addressed in Section IV below will not result in significant environmental impacts.

IV. FINDINGS REGARDING NO SIGNIFICANT ENVIRONMENTAL IMPACTS OR LESS THAN SIGNIFICANT ENVIRONMENTAL IMPACTS (PUBLIC RESOURCES CODE §21081(a)(1))

The City, having reviewed and considered the information contained in the EIR, including the AIS, finds pursuant to Public Resources Code §21081(a)(1) and Guidelines §15091(a)(1) that the PROJECT would have no significant environmental impact or an environmental impact less than significant for one or more threshold questions in the following environmental issue areas: air quality, biological resources, health and safety, land use, and public utilities.

A. Air Quality (Project-level and Cumulative)

Potential Impacts: The PROJECT would not have significant project-level or cumulative impacts to the following environmental issue:

- Results in an increased number of automobile, train, or airplane trips or stationary source emissions which could potentially affect San Diego's ability to meet regional, state and federal clean air standards, including the RAQS or SIP, for CO, ozone and hydrocarbons, NO_2 and SO_2 (project-level or cumulative) or NO_X, CO, and ROG resulting from construction emissions (cumulative).

Facts in Support of Findings: The PROJECT directs the growth and development for the City through goals and policies designed to guide future community plans and projects. The policies focus most future development into mixed-use activity centers, and would result in infill, redevelopment and new development occurring in selected built areas (areas would be identified through the community plan update/amendment process). It would also guide the development of remaining vacant land. SANDAG estimates an approximately 28 percent increase in population by the horizon year 2030 for the PROJECT area. Typically, there is a direct positive relation to new population, automobile use, construction-related activities, and resultant pollutant emissions. While transportation improvements addressed in the recently adopted EIR prepared for the Regional Transportation Plan (RTP) MOBILITY 2030 will relieve some of the increased automobile trips, a net increase of automobile, train and airplane trips is anticipated with or without implementation of the PROJECT due to the increased population.

Construction resulting from implementation of the PROJECT, as described in Section V.(B) below, will result in short-term, localized impacts to the ability to meet standards for NO_X, CO, and ROG. However, the PROJECT area and region are both anticipated to have levels of these pollutants decrease over time due to technological improvements and implementation of PROJECT policies. Therefore when considered with other anticipated development in the region, there would be no cumulative impacts associated with standards for construction-related NO_X, CO, and ROG as all impacts would be localized and temporary.

Overall, implementation of the PROJECT will benefit the region's air quality by helping to relieve traffic congestion and encouraging more efficient transportation methods. The land use (smart growth) concepts of the PROJECT reduce average trip distances and encourage transit or bicycle use. PROJECT policies and actions specifically require conformance of the transportation plans and programs with the SIP, RAQS, and TCM Plan. Other policies strengthen air quality regulations and enhance programs to help meet federal and state air quality standards. Implementing these policies will ensure that the PROJECT would not conflict with or obstruct implementation of the RAQS or other applicable air quality management plans. Furthermore, the California Air Resources Board recognizes that, through the quality improvements such as those described in PROJECT policies, harmful pollutants resulting from mobile sources will continue to decline. This analysis was performed for the entire regional air basin, and therefore impacts from other projects were considered as well for cumulative impacts. Therefore, attainment with regards to standards for CO, ozone and hydrocarbons, NO_2 and SO_2 will be reached even with implementation of the PROJECT and will have impacts below a level of significance, at both the project and cumulative levels of analysis.

B. Biological Resources (Project-level and Cumulative)

Potential Impacts: The PROJECT would not have significant project-level or cumulative impacts to the following environmental issues:

- Affects the long-term conservation of resources by allowing encroachment by urban development into a defined resource planning area (e.g. MHPA);
- Results in a conflict with any local policies or ordinances protecting biological resources; or
- Results in noise impacts on sensitive species.

Facts in Support of Findings: The PROJECT directs the growth and development for the City through goals and policies designed to guide future community plans and projects. The policies focus most future development into mixed-use activity centers, and would result in infill, redevelopment and new development occurring in selected built areas (areas would be identified through the community plan update/amendment process). It would also guide the development of remaining vacant land. The policies of the PROJECT guide the conservation of resources to remain consistent with existing environmental regulations, goals, and policies, including the MSCP, ESL Ordinance, and the City's Biology Guidelines. Implementation of the PROJECT would also be consistent with the MHPA Land Use Adjacency Guidelines. Because specific location of development will be identified through future community plan updates, future growth may be proposed in or near the MHPA. However, the MSCP Plan contains a provision that requires additional lands be added to the MHPA that have an equal or better biological value than those lands removed for development or impaired. Therefore, the PROJECT is not anticipated to result in any significant direct or indirect impacts on any resource planning area or local policies or ordinances protecting biological resources. Noise impacts on sensitive species habitat lands could result from construction, roadway traffic, or commercial or recreational uses from new development in or near the MHPA. However, the MSCP requires berms, walls, or other noise mitigation measures be developed to mitigate any potential noise impacts to a level

below significant. All future projects and community plan updates associated with the PROJECT would incorporate these mitigation measures. Cumulative impacts of encroachment of development into a resource planning area, conflict with local regulations protecting biological resources, or noise impacts on sensitive species also would not occur because of physical location outside of the City limits.

C. Health and Safety (Project-level and Cumulative)

Potential Impacts: The PROJECT would not have significant project-level or cumulative impacts to the following environmental issues:

- Exposes people or structures to a significant risk of loss, injury or death involving flooding, including as a result of dam or levee failure.

Facts in Support of Findings: The PROJECT sets the goals and policies necessary to accommodate an anticipated growth of population and development of housing and other structures over existing levels. The policies encourage future development within mixed-use activity centers, resulting in infill, redevelopment and new development occurring in selected built areas (areas would be identified through the community plan update/amendment process). It would also guide the development of remaining vacant land. Flood hazard areas, including 100-year floodplains and dam inundation areas, exist throughout the PROJECT planning area. Mission Valley contains a variety of land uses, though development of additional residential and business-related uses in this area must comply with existing programs aimed to reduce flooding hazards. Other flood hazard areas are predominantly reserved for Open Space preservation and would not contribute to the impact of flooding hazards on people or structures. Because dams are required to undergo regular inspection for safety, including capacity to not fail during a major seismic event, and the probability of a major earthquake being low when the reservoirs are full, the impacts with dam inundation are not expected to occur.

Though the PROJECT does not specifically locate new development, and serves as a guide for future community plan updates and development projects under which environmental review specific to an area would further evaluate these hazard risks, it is unlikely that development from implementation of the PROJECT located anywhere in the planning area will result in hazard risks to people or structures as a result of flooding. Likewise, the incremental increase in population and structures in a regional context would not create a cumulatively significant impact from flooding.

D. Land Use (Project-level and Cumulative)

Potential Impacts: The PROJECT would not have significant project-level or cumulative impacts to the following environmental issue:

- Conflicts with any adopted environmental plans, including applicable habitat conservation plans.

Facts in Support of Findings: The PROJECT encourages infill and redevelopment occurring in selected built areas (areas would be identified through the community plan update/amendment process) and would guide the development of remaining developable vacant land. The PROJECT policies would be consistent with the overarching MSCP goal to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, while enabling economic growth in the region. The PROJECT requires any future modifications to the MSCP to result in equal or better biological values. Protective measures within adopted regional, state, and federal environmental plans, including applicable habitat conservation plans and compliance with the mandatory policies and regulations of state or federal agencies would ensure that physical changes to the environment associated with the incremental effect of the PROJECT on adopted regional, state, and federal environmental plans, policies and regulations is not cumulatively considerable when viewed in connection with physical changes to the environment associated with future regional development in surrounding jurisdictions. Because key PROJECT policies direct avoidance of conflict with MSCP goals, and are consistent with the MHPA Land Use Adjacency Guidelines relating to drainage, toxics, noise, barriers, invasive species and brush management, the PROJECT is not anticipated to result in any significant direct or cumulative impacts on environmental or habitat conservation plans.

E. Public Utilities (Project-level and Cumulative)

Potential Impacts: The PROJECT would not have significant project-level or cumulative impacts to the following environmental issue:

- Results in the use of excessive amounts of water beyond projected available supplies.

Facts in Support of Findings: The PROJECT directs the growth and development for the City through goals and policies designed to guide future community plans and projects. SANDAG estimates an approximately 28 percent increase in population by the horizon year 2030 for the PROJECT area, and this was used in the calculation for water demand in the County Urban Water Management Plan through 2030. The Water Plan projects reliability of the water supply to meet the needs of the projected population and guides the Water Authority to pursue other strategies to increase water supply in the event of water shortages. The ability to meet additional future water supply needs will rely on the construction of new facilities or the enhancement of existing facilities. The construction and operation of these facilities could potentially cause a significant impact, though this is addressed through a separate question below in Public Utilities Section V.(N). Urban development that may occur under the PROJECT is not expected to exceed the projections made by SANDAG and used in the Water Plan, however if unforeseen shortages occur, contingency plans exist for addressing such an event. Reductions may result from dry or critically dry years, mandates for reduced pumping associated with endangered species habitat, water sharing agreements, or other reasons for water supply disruption. The 2005 Urban Water Management Plan provides analysis under reduced water supply conditions, and demonstrates that through a combination of programs and alternative plans, the Water Authority will be able to meet essential water demands. Furthermore, the Metropolitan Water District of Southern California is developing a comprehensive Drought Management Plan that

would be coordinated throughout the San Diego region. This plan will include all aspects of drought planning including steps to avoid rationing, drought response stages, allocation methodology, pricing, and communication strategy. These actions demonstrate the steps that can be taken in the event the current supply is reduced or disrupted for any reason and will assist in keeping impacts related to water supply below a level of significant.

The PROJECT emphasizes the need to provide and maintain essential water supply infrastructure to serve existing and future development, to continue to participate in watershed planning efforts, and to coordinate land use planning and water infrastructure planning with local, state, and regional agencies. Policies and programs of the PROJECT also call for an integrated approach to watershed planning, and water supply and land use studies to ensure that the City can provide adequate water supplies for present uses and accommodate future growth. The projected water supply is anticipated to meet water demands for the Year 2030, and alternatives such as the development of additional storage, use of recycled water, ground water, conservation, and canal lining have been identified to alleviate the risk of potential water shortages. Furthermore, the Drought Management Plan would identify actions to be taken by the Water Authority to minimize impacts resulting from a water shortage due to drought and include strategies to address water related emergencies. Additionally, the City has the ability to condition development with all reasonable mitigation to avoid, minimize, or offset the impact to the water supply. Therefore, no significant project-level impact has been identified.

As well, the County water demand identified in the Water Plan for existing and new development through Year 2030 is anticipated to be met, and alternatives or contingency plans are addressed in the event of a water shortage. For reasons similar to the findings above, there is no significant cumulative impact identified, and implementation of the PROJECT in combination with the anticipated development is considered a less than significant cumulative impact on regional water supply.

V. FINDINGS REGARDING SIGNIFICANT ENVIRONMENTAL IMPACTS NOT FULLY MITIGATED TO A LEVEL LESS THAN SIGNIFICANT (PUBLIC RESOURCES CODE §21081(a)(3))

The City, having reviewed and considered the information contained in the EIR, including the AIS, finds pursuant to Public Resources Code §21081(a)(3) and Guidelines §15091(a)(3) that 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 EIR, and that potentially significant and unavoidable project- and cumulative-level environmental effects identified in the EIR will remain significant and unavoidable, for environmental issues evaluated in: agricultural resources, air quality, biological resources, geologic conditions, health and safety, historical resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, transportation/ traffic circulation/parking, visual effects and neighborhood character, water supply and quality, and growth inducement. In addition, the City finds that the PROJECT will contribute to a cumulative environmental effect related to global warming identified in the EIR.

A. Agricultural Resources (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Results in the conversion of agricultural lands to nonagricultural use or impairs the agricultural productivity of agricultural lands; or
- Conflicts with existing zoning for agricultural use, or Williamson Act contract.

Facts in Support of Findings: The City owns a 14,000-acre agricultural preserve in the San Pasqual Valley which compromises less than two percent of the City's land area. The PROJECT continues the City's existing programs for protecting the best remaining agricultural lands with lease agreements by establishing goals and policies to protect existing agricultural land. However, while no specific projects or actions have been identified with the PROJECT which would result in the direct conversion of existing agricultural land, future discretionary projects could impair the productivity of existing agricultural land with encroaching urban development. Currently, a Community Plan update program is being established to help ensure that the City's community plans are consistent with the General Plan. If a future determination is made during project review or a Community Plan update that a priority be placed on competing uses such as water resources, biological or cultural resource management, or recreation, this determination could allow development of a project which results in the conversion of agricultural land. When viewed with the direct and indirect loss of these resources to urbanization and the impairment of the productivity of existing agricultural lands elsewhere in the County, these impacts are also considered cumulatively significant and unavoidable.

There currently are no Williamson Act contracts in the City, though the PROJECT does contain policies to provide mechanisms for private land owners of prime agricultural lands to take advantage of the Williamson Act. Williamson Act contracts do exist in the County, and implementation of the PROJECT could cause an impairment of the productivity of these lands as a result of the regional effects of urbanization. Because impacts are unknown at this level of analysis, the PROJECT does not establish a mitigation framework for potential significant agricultural resources; rather, if project-level or cumulative significant impacts to agricultural resources are identified during community plan updates or future discretionary project environmental review, mitigation would be developed to lessen these impacts, though the impact after mitigation may remain significant and unavoidable.

B. Air Quality (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Results in an increased number of automobile, train, or airplane trips or stationary source emissions which could potentially affect San Diego's ability to meet regional, state and federal clean air standards, including the RAQS or SIP, for particulate matter and construction emissions; or

- Results in air emissions that could substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations.

Facts in Support of Findings: The PROJECT directs the growth and development for the City through goals and policies designed to guide future community plans and projects. The policies encourage most future development in mixed-use activity centers, resulting in infill, redevelopment and new development occurring in selected built areas (areas would be identified through the community plan update/amendment process). The PROJECT also guides the development of remaining vacant land. The construction activities associated with growth could impact the region's air quality, through equipment which operates on diesel fuel and emits NO_X, CO, and ROG; similarly, construction activities would generate additional vehicle trips by workers traveling to and from construction sites. This activity could exceed daily emissions standards on a project-level basis set by the Air Pollution Control District; however, these potential significant and unavoidable impacts would be short-term in nature.

PROJECT levels of particulate matter (both PM_{10} and $PM_{2.5}$) could also potentially exceed daily emissions standards due to grading and earth moving activities during construction. These potential impacts would be localized and short-term in nature. Unlike other construction emissions, however, the CARB anticipates the trend for particulate matter released in the air to continue to rise and the region will be in non-attainment for particulate matter as a result, in part, of implementation of the PROJECT. Other regional development would compound the particulate matter emissions, resulting in cumulatively significant and unavoidable impacts to the ability to meet regional, state and federal clean air standards, as well as a deterioration in ambient air quality. Greenhouse gas emissions are evaluated in Section V(S) below.

Because implementation of the PROJECT places an emphasis on mixed-use development and intensification of development in village-like areas, the PROJECT allows for residential and industrial uses or residential and commercial uses on the same or adjacent parcels. This could cause criteria pollutants or other air contaminants to affect sensitive receptors. As well, severe traffic congestion at large intersections could create localized CO "hot spots", causing CO concentrations to exceed state and federal standards. Because the PROJECT does not locate specific land uses and relies on future community plan updates, the degree of impact cannot be known for each specific project at this level of analysis, and therefore impacts related to a deterioration of ambient air quality would remain significant and unavoidable.

A mitigation framework is established to guide the development of specific mitigation measures for future plans and projects. This includes using Best Available Control Measures and a Construction Management Plan to reduce construction emissions. Entitlements would be permitted only when a project is demonstrated to apply all reasonable mitigation that would avoid, minimize or offset the impact. Project-level assessments will be made to ensure that effects from collocation of residential and industrial or commercial uses, as well as nearby CO hot spots, are minimized. Because the applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this level of analysis, both project-level

and cumulative impacts could remain significant and unavoidable after reasonable mitigation is employed for the deterioration of ambient air quality and ability to meet air quality standards.

C. Biological Resources (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Results in the reduction in number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals;
- Results in significant impacts to important habitat, or results in interference with the movements of resident or migratory fish or wildlife species; or
- Results in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means.

Facts in Support of Findings: The PROJECT places an emphasis on infill development or redevelopment of existing urban areas, includes policies consistent with the MSCP and City's Biology Guidelines, and is designed to avoid adjacency concerns with the City's planned habitat preserve, the MHPA. This development policy focuses urbanization in existing, developed areas which would minimize potential habitat fragmentation, isolation, or destruction.

However, it also guides the development of remaining vacant land or developed areas adjacent to vacant land which could have impacts to biological resources. No specific projects or actions have been identified with the PROJECT that would result in any direct or indirect physical change to the environment, though the PROJECT may allow impacts to biological resources to occur with future actions, such as community plan updates. These actions could impact important native habitat which may result in the reduction of the number or restrict the range of a rare or endangered plant or animal, affect wildlife movement corridors, or impact wetland habitat. As well, future development outside of, though adjacent or near, the City limits could cumulatively impact sensitive species, habitats, wildlife movements or wetlands.

Some impacts could be reduced through future mitigation. A mitigation framework has been established to guide the development of specific future mitigation measures for community plans, projects, or other plans or developments. This framework directs mitigation to be designed in order to minimize or eliminate impacts to natural habitats and known sensitive resources, to assess and compensate for upland impacts, to provide for continued wildlife movement through wildlife corridors, and to conform to MHPA Land Use Adjacency Guidelines, which include several measures aimed at reducing or eliminating environmental impacts to the MHPA. Additionally, the mitigation framework addresses minimization of construction noise or clearing activities on sensitive species' habitat areas, particularly during breeding seasons for sensitive or endangered species, and development of protocol to ensure appropriate monitoring by qualified biologists during project implementation.

Since no specific projects have been identified, it is infeasible at this time to provide mitigation to a level that would result in a guaranteed no net loss of endangered or threatened species, habitat, wildlife corridors, or wetlands, and project-level and cumulative impacts could remain significant and unavoidable.

D. Geologic Conditions (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Results in the exposure of people or property to geological hazards such as groundshaking, fault rupture, landslides, mudslides, ground failure, or similar hazards;
- Results in a substantial increase in wind or water erosion of soils; or
- Results in allowing structures to be built on a geological unit or soil that is unstable or that would become unstable and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction or collapse.

Facts in Support of Findings: The PROJECT guides future residential, commercial, workplace, and other development for the City to accommodate future growth pressures. The entire City is susceptible to seismic activity due to known active faults in the region. Existing and future building regulations and development technologies can minimize the risk to public safety; however, implementation of the PROJECT can expose more people and structures to increased risk from seismic activity from structures which pre-date stringent regulations. Slope failure could occur due to landslides or mudslides from unstable soils and cause risk of injury, death, or structural loss for development on or downhill from these unstable areas. Similarly, the potential for erosion effects is greater where development has weakened unstable soils or removed vegetative cover. Areas within the planning area are also known to be potentially susceptible to landslides or soil limitations such as liquefaction, subsidence, or collapse. The additional development and intensity of land uses could potentially occur on soil that is unstable or would become unstable, increase the risk of erosion, and potentially result in on-site or off-site ground failure. Because the PROJECT does not propose specific siting of new buildings, it is infeasible at this level to rule out an increase in geologic hazards, and therefore the implementation of the PROJECT could place more people or structures at risk of injury, loss, or death due to seismic activity. This is a potentially significant and unavoidable impact. Development projects and future community plan updates which are guided by the PROJECT will more accurately assess geologic hazards on a project-level basis. An incremental increase in the number of people exposed to seismic and geologic hazards cannot be precluded, and when viewed in connection with the regional exposure of people to such hazards, is considered cumulatively significant and unavoidable.

The PROJECT contains policies which address geologic hazards. Generally, these policies call for adherence to regulations in order to preclude development from significant geologic impacts. It is possible that for certain projects, adherence to regulations may not adequately protect against geologic impacts and such projects would require additional measures to avoid or reduce

impacts. Consequently, a mitigation framework is established to guide the development of specific mitigation measures for future community plans, projects, or other plans or development. This framework suggests mitigation which would ensure site surveys for geologic hazards, implement state seismic and structural design requirements, and implement regulations to minimize landslides and erosion including improved grading techniques and monitoring of project implementation by a qualified geologist. However, since no specific projects have been identified, it is infeasible at this time to provide mitigation that would reduce any future seismic and geologic hazards, erosion, and unstable geology and soils impacts to a level less than significant, and potential project-level and cumulative impacts could remain significant and unavoidable.

E. Health and Safety (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Exposes people or sensitive receptors to potential health hazards (e.g., exposing sensitive receptors to hazardous materials in Industrial areas or pesticides in areas of previous agricultural uses);
- Exposes people or structures to a significant risk of loss, injury or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;
- Exposes people or structures to a significant risk of loss, injury or death from seiche, tsunami, or mudflow;
- Exposes people or structures to a significant risk of loss, injury or death from aircraft operations accidents; or
- Impairs implementation of, or physically interferes with an adopted emergency response plan or emergency evacuation plan.

Facts in Support of Findings: The PROJECT guides future development to accommodate anticipated growth for the City, and would allow for additional residential, commercial, and industrial land uses in selected areas. While goals and policies of the PROJECT express the intent to minimize incompatible land uses, collocation of residential and industrial uses could exist and therefore expose sensitive receptors in residential areas to hazardous materials produced by industrial operations. Sustainability Factors are outlined in the PROJECT which would define where these uses may be appropriately mixed. While the PROJECT encourages infill development and redevelopment of existing urban developed areas, the potential addition of structures or intensity of development near the urban/wildland interface could increase the risk of loss, injury or death involving wildfires. As well, infill development within the urbanized areas near canyons, hillsides or other natural open space areas further heightens the risk of wildfire to structures as a result of implementation of the PROJECT. Coastal development that may occur during implementation of the Project could potentially be affected by tsunami or seiche, though based on the theoretical ability and historical occurrence of a major underwater seismic event powerful enough to generate destructive waves that reach the PROJECT area, the probability is very low and current building code regulations and federal emergency notification

plans lessen the risk to safety of people and structures further. Areas at the base of foothills or canyon hillsides which may be prone to mudslides and could create a potentially significant impact. Development from implementation of the PROJECT could occur in areas within an Airport Influence Area, though the ALUC would evaluate potential development for the risk from aircraft operations, and incompatibility for land uses within the influence area. However, potential development may be subjected to FAR Part 77 imaginary surfaces which extend beyond the boundaries of the Airport Influence Area, and adopted zoning ordinances and development regulations could cause intensity of development of future structures that could pose a potentially significant impact to safety from aircraft operations. Finally, the proposed growth and development under the PROJECT would result in greater demands on the successful execution of emergency response or evacuation plans and could create a potentially significant impact.

Because no specific projects have been identified at this time, at the PROJECT level, these impacts to hazards related to hazardous materials exposure, wildfires, seiche, tsunami, mudslides, aircraft operations, and execution of emergency plans remain significant and unavoidable. Additionally, the population growth occurring during implementation of the PROJECT may result in an incremental increase to other population and development growth in the region exposed to these hazards, and therefore a cumulatively significant and unavoidable impact. A Community Plan update program is being established to help ensure that the City's community plans are consistent with the General Plan. The community plans will review proposed community land use maps and will further evaluate the compatibility of adjacent land uses and examine potential exposure of health hazards on sensitive receptors on specific land use areas. Likewise, the future evaluation of specific locations of intensity of development would be required to assess the potential risk of wildfires to new development and any potential increased demands on emergency services and access to and from the new development.

Because no specific projects have been identified at this time, at the PROJECT level, it is infeasible at this time to provide specific mitigation measures which would reduce a potential impact to a level less than significant. However, the PROJECT does establish a mitigation framework to guide development of specific mitigation measures under the community plans, specific plans, or other future projects which may reduce significant project-level impacts to less than significant, or the project level impact may remain significant where no feasible mitigation exists. The framework includes using Conversion/Collocation Suitability Factors to analyze compatibility of site specific proposals, and designing future projects located in known High Fire Hazard areas to minimize the impacts of fires by creating defensible space. Still, because the degree of impact, applicability, and success of these measures cannot be adequately known for each specific project at this level of analysis, these hazards remain significant and unavoidable after mitigation at this time at the project and cumulative levels.

F. Historical Resources (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant direct and cumulative impacts to the following environmental issues:

- Results in adverse physical or aesthetic effects to prehistoric, historic, or architecturally significant buildings, structures, objects, or sites; or
- Results in impacts to existing religious or sacred uses within the City or the disturbance of any human remains, including those interred outside formal cemeteries.

Facts in Support of Findings: The City includes many areas which have sites listed on or are eligible to be included in a registry of historic places, or have the potential to contain significant archaeological or cultural artifacts. Because the PROJECT guides future residential, commercial, industrial, and other development for the City to accommodate anticipated future growth pressures, the construction or operation of new buildings have the potential to impact these resources, particularly where ground disturbing activities such as grading or excavation are required. Furthermore, there are areas within the City where prehistoric human remains have been uncovered during archeological investigations and grading activities, and tribal activities are known to have occurred.

The PROJECT includes policies to protect and preserve historic artifacts, and these protections are emulated in the existing development code and CEQA review process, both of which require extensive regulatory processes to avoid adverse impacts to these resources. Enforcing these regulations would help to reduce the potential impacts from construction and other PROJECT implementation activities, but because no specific development projects are proposed at this time, it cannot be guaranteed at this level of analysis that all impacts would be avoided, and therefore the project-level impacts to historic resources remain significant and unavoidable. Furthermore, any potential incremental impacts related to historic and archaeological resources and prehistoric human remains, when viewed in connection with historic resources impacts elsewhere in the county, are also considered cumulatively significant and unavoidable.

Beyond existing and future regulatory processes, the PROJECT establishes a mitigation framework to guide future community plans and development projects. This framework includes detailed measures that are currently applied to projects that could impact historical resources. In the future, mitigation measures may be periodically updated, and future projects would also be subject to site-specific measures in effect at the time the projects are processed. These measures could reduce impacts to below a level of significance, however because the degree of impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known, mitigation may be infeasible for each specific future project and both project-level and cumulative impacts may remain significant and unavoidable.

G. Hydrology (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Results in changes in absorption rates, drainage patterns, or the rate of surface runoff.

Facts in Support of Findings: The PROJECT guides future residential, commercial, workplace, and other development for the City to accommodate anticipated future growth pressures. To accomplish this, it encourages infill development in existing urban areas but also allows for development in existing vacant lands. While development of vacant lands would increase the amount of impervious surfaces, infill development could also potentially reduce the amount of landscaped area or otherwise affect the pattern or rate of water absorption, surface drainage or runoff. The PROJECT uses a Village Propensity Map to identify areas which may be suitable for village-type development, potentially resulting in impacts to watersheds downstream. Because no specific development is proposed under the PROJECT, the severity of impacts can only be evaluated at a project or specific plan level, as such at this PROJECT level of analysis, these impacts remain significant and unavoidable. Future development associate with projected population growth in the county will result in increased impervious surfaces within the county's watersheds, which will result in hydrologic impacts. Potential incremental hydrological impacts related to absorption rates, drainage patterns, or the rate of surface runoff described here, are therefore also considered cumulatively significant and unavoidable.

The PROJECT establishes policies for management of floodplains to protect public health and safety. This includes conserving natural drainage features and limiting the alteration of existing watersheds. The PROJECT also establishes a mitigation framework to guide the development of specific mitigation measures for future community plans, projects, or other development plans. At these levels, assessments to absorption rates, drainage patters, or the rate of surface runoff may be made to determine the level of impact. Future projects would rely on compliance with regulations and the development review process in order to establish project-specific mitigation measures, including siting, design, and additional drainage features that may reduce the level of impact to below a level of significance, or mitigation may be infeasible and the project-level and cumulative impacts to hydrology of the future project would then remain significant and unavoidable.

H. Land Use (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Conflicts with the environmental goals of adopted community plans, land use designations or any other applicable land use plans, policies or regulations of state or federal agencies with jurisdiction over the City;
- Results in land uses that are not compatible with any applicable Airport Land Use Compatibility Plans;
- Physically divides an established community; or
- Creates substantial incompatibilities between adjacent land uses.

Facts in Support of Findings: The PROJECT would result in infill and redevelopment occurring in selected built areas (areas would be identified through the community plan update/amendment process) and would guide the development of remaining developable vacant land. Although no specific projects or actions have been identified with the PROJECT that

would result in any direct or cumulative physical change in the environment, future actions and developments are anticipated that could result in conflicts with other adopted plans in the following areas: environmental policies, land use designations, coastal zone, and other agencies. Future actions and development could also have impacts not known at this time which may physically divide communities. The PROJECT supports a greater mixing of land uses as a way to reduce commute distances and to make it possible for people to access a wide variety of goods and services on foot. This mixed-use development could result in impacts related to noise, lighting, air quality, odors, facilities and public health impacts due to the adjacency of two or more incompatible land uses.

A mitigation framework has been established to guide future mitigation measures to be developed for future community plans, specific plans, projects or other plans or developments. This framework includes a Community Plan update program, implementation of new base zone use packages, and project development review. Existing and future regulations will provide development standards aimed at reducing land use incompatibilities. Currently, a Community Plan update program is being established to help ensure that the City's community plans are consistent with the General Plan, and they serve as an effective means to implement citywide environmental policies and address policies related to Airport Land Use Plans. Future projects must also be implemented to ensure that they do not conflict with the General Plan and applicable community plans resulting in a physical impact on the environment. Prior to the approval of any entitlement, the City would evaluate whether the proposed projects implement specified land use, density/intensity, design guidelines, Airport/Land Use Compatibility Plans, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.

Implementation of PROJECT policies, future community plan updates and future compliance with established development standards would serve to reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Furthermore, these potential incremental adverse changes to the environment associated with land use impacts, when viewed in connection with such adverse physical changes associated with land use impacts elsewhere in the county, are considered cumulatively significant and unavoidable. Because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the program-level impacts related to conflicts with goals in adopted plans, incompatible land uses, and that may physically divide established communities remains significant and unavoidable at both the project and cumulative levels.

I. Mineral Resources (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issue:

- Results in the loss of significant mineral resources (e.g. sand and gravel) that could be of value to the region and residents of the state.

Facts in Support of Findings: Areas within the City are known to contain important mineral resources such as salt, sand, and gravel, all of which have been extracted for decades. Impacts may occur when access to the resource is restricted or prohibited. The mineral production process can create substantial noise, dust, pollution, and other undesirable consequences which could be determined incompatible with nearby land uses and render the operations infeasible. The PROJECT includes a number of policies aimed at protecting mineral resources, although determination of land use compatibility between a future project and significant mineral resources and the conflicts of mining in a MSCP preserve would be addressed through a future entitlement process.

Because the PROJECT does not address specific project developments, the impacts to mineral resources cannot be known at this level of analysis. However, because there is potential through implementation of the PROJECT to result in conflicts with land uses and the loss of access to significant mineral resources, the impacts remain significant and unavoidable. Future community plans, discretionary projects, and other actions would incorporate an analysis for impacts to mineral resources, though no mitigation is known at this time which would reduce potential project-level significant impacts to important mineral resources. Furthermore, development associated with future growth in San Diego County could result in adjacent incompatible land uses that impact the extraction of mineral resources of value to the county and/or state. Therefore, potential incremental mineral resource impacts, when viewed in connection with incompatible land uses that impact the extraction of valuable mineral resources elsewhere in the county, are considered cumulatively significant and unavoidable.

J. Noise (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Results in exposure of noise-sensitive land uses to future noise levels which exceed those established in the adopted *Progress Guide and General Plan*, community plans, noise ordinance, Airport Land Use Compatibility Plans (ALUCPs), or applicable standards of other agencies;
- Results in a substantial increase in the existing ambient noise levels; or
- Results in increased land use incompatibilities associated with noise.

Facts in Support of Findings: Construction activities related to implementation of the PROJECT could potentially generate short-term noise impacts to noise-sensitive land uses located adjacent to or near construction sites. While PROJECT policies and goals, in addition to the City Noise Ordinance, encourage limitations of hours or noise-buffering methods, construction noise impacts on sensitive land uses could occur. Transportation noise impacts resulting from the anticipated increase of rail, transit, aircraft, and automobile use could potentially cause significant noise impacts on adjacent or nearby sensitive land uses. Potential collocation of commercial or industrial development near residential or other sensitive land uses could cause significant noise impacts from operations on these uses. Because the PROJECT directs the growth in population and increased economic and development activity in the City

ambient noise levels by the sources described above could potentially be increased, particularly in less developed existing areas or vacant lands. This could be a potentially significant impact. The PROJECT also proposes a revision to the City's Land Use-Noise Compatibility Guidelines which includes the creation of a "conditionally compatible" category, which permits building of a particular use that would bring noise experienced by receptors down to specific, non-offensive levels. Policies such as encouraging noise attenuation structures in the design, limiting the hours of operation or truck deliveries, limiting outdoor activities that generate noise, and coordination of special events are included in the PROJECT, though they cannot guarantee that land use incompatibilities may occur for every future specific project. Finally, development intensity may be permitted by the PROJECT in areas already subjected to high noise impacts, which would heighten an existing significant impact. Therefore, the PROJECT could result in increased land use incompatibilities.

As the county develops in response to projected growth, there would be an increase in the noise generated by construction, transportation networks, and stationary sources for reasons identical to those described above. These noise impacts resulting from implementation of the PROJECT, when viewed in connection with noise impacts from sources elsewhere in the county, could cumulatively expose sensitive receptors to greater noise levels, increase the ambient noise levels, or result in greater land use incompatibilities. These would result in cumulatively significant impacts.

The PROJECT serves as a guide for future development projects and community plan updates, and at these levels specific noise studies may be made. Because the PROJECT does not propose specific locations for growth and resultant intensities of land uses, the specific noise impacts on sensitive land uses cannot be measured at this level of analysis, though impacts may occur. Therefore, the project-level impacts of increased noise on sensitive land uses, increased ambient noise levels, and increased land use incompatibilities associated with noise remain significant and unavoidable. The PROJECT establishes a mitigation framework to guide future projects in plans in the development of specific mitigation measures that would reduce the noise impacts. In addition to existing regulations and policies, these include the use of acoustical studies for proposed projects, locating or designing projects in a manner that avoids noise impacts, and the inclusion of noise attenuation methods or architectural treatments. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this level of analysis, the project-level and cumulative noise impacts would remain significant and unavoidable.

K. Paleontological Resources (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issue:

- Allows development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a medium to high fossil bearing potential.

Facts in Support of Findings: The City contains a number of distinct geologic rock formations that record past earth history, including marine and non-marine sedimentary rocks which record the relationship of the region with respect to the land and sea. Some layers contain significant fossil remains of varying paleontological resource sensitivity. Fossil remains, fossil sites, fossil-producing geologic formations, and potential fossil-producing geologic formations are all considered potential paleontological resources and have been discovered in the area during construction operations. These resources may be disturbed through construction or other earth-moving activities and could create a significant impact. The PROJECT does not include specific policies for the protection of paleontological resources, nor do current land development regulations. Rather, these resources are identified and protected through the environmental review process for discretionary projects. Therefore, impacts to paleontological resources remain significant and unavoidable at the project level of analysis. Additionally, there is potential for the cumulative loss of such resources throughout the county as development within the county could have similar impacts to paleontological resources. Therefore, incremental paleontological resources impacts, when viewed in connection with the mass grading, underground parking, roadway construction and other activities elsewhere in the county, are considered cumulatively significant and unavoidable.

The PROJECT establishes a mitigation framework for future community plans and discretionary projects to develop specific mitigation measures to minimize impacts to paleontological resources. This framework suggests current review and monitoring practices that could be required during construction activities. However, because specific development projects are not known at this time, and there is a lack of regulatory language in the development code requiring protection of paleontological resources, the project-level and cumulative impacts to these resources remain significant and unavoidable.

L. Population and Housing (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issue:

- Results in development, redevelopment, or infrastructure expansion that could displace substantial numbers of people or housing, necessitating the construction of replacement housing.

Facts in Support of Findings: SANDAG projections indicate that the City's population will increase by over 360,000 people and add almost 120,000 housing units by 2030. Because of the limited amount of vacant land available, the PROJECT emphasizes infill housing in underutilized areas and policies to direct growth around mixed-use, transit-accessible locations to provide links between employment centers, housing, and villages. As well, the concepts of balanced communities and equitable development policies are designed to minimize displacement of existing residents as communities develop over time. City programs currently include affordable housing measures, redevelopment project areas, and expedited processing services for sustainable developments. Despite these programs and policies, some displacement of residents is likely to occur as older housing units are replaced. Low-income households are

most likely to be adversely affected. In some instances, but possibly not all, people will have access to City programs providing housing assistance. Therefore, at the project-level of analysis, the potential for a significant and unavoidable impact remains. Future development, redevelopment or infrastructure expansion in the County also could potentially displace substantial numbers of people or housing for similar reasons, and this impact may be considered significant and unavoidable. Therefore, the potential incremental displacement of people or housing resulting in a need for replacement housing under the PROJECT, when viewed in connection with the displacement elsewhere in the county, is considered cumulatively significant and unavoidable.

The PROJECT establishes a mitigation framework to guide future community plans, discretionary projects, and other actions which is largely comprised of adherence to existing regulations and programs. However, it is possible that these would not be sufficient to adequately address the population and housing impacts and such projects would require additional site-specific mitigation measures to avoid or reduce significant impacts. Where mitigation is determined infeasible, however, project-level and cumulative impacts may remain significant and unavoidable.

M. Public Services and Facilities (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issue:

- Promotes growth patterns resulting in the need for and/or provision of new or physically altered public facilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.

Facts in Support of Findings: SANDAG projections forecast a 28 percent growth in population and 24 percent growth in housing units by year 2030 above existing levels; this will impact various public services and facilities. The PROJECT also calls for existing deficiencies to be remedied. This necessitates additional staff, equipment, and new or expanded facilities to serve the needs of the current and future population. In addition, the PROJECT incorporates the City of Villages strategy with densification of existing or planned mixed-use centers and corridors, which will require higher-capacity services to serve the areas. The construction of these facilities may have significant adverse environmental impacts. However, the PROJECT does not predict nor address specific development, and therefore it is infeasible at this time to project the level of impact of these facilities. As a result, the impacts would remain significant and unavoidable at the project-level of analysis. Additionally, future development in the county would require new or improved public services and facilities infrastructure in the county or city due to increased demand, and the construction of these facilities may have significant impacts. Therefore, potential incremental impacts associated with the construction of future public services and facilities infrastructure improvements, when viewed in connection with the increased regional demand for and construction of such improvements, would be considered cumulatively significant and unavoidable.

The PROJECT establishes a foundation for future community plan updates, discretionary projects, and other plans or development. Specific levels of impact to public services and facilities would be determined at the project level. The PROJECT also establishes a mitigation framework to guide future projects in the development of specific mitigation measures, which instructs mitigation to respond the impacts to other environmental issue areas (impacts to biological, historical, or other resources as a result of implementation of the project). Mitigation may reduce the project-level and cumulative impacts to a level below significant, but if mitigation is found to be infeasible the level of impact may remain significant and unavoidable.

N. Public Utilities (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Promotes growth resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives; or
- Results in the use of excessive amounts of electrical power, fuel or other forms of energy.

Facts in Support of Findings: The PROJECT guides future residential, commercial, workplace, and other development for the City to accommodate anticipated future growth pressures. To accomplish this, it encourages infill development in existing urban areas but also allows for development in existing vacant lands. Current City public utilities include water, solid waste, storm water infrastructure, and public utilities infrastructure. Private communications and energy infrastructure is also found throughout the City, and the City is able to take a leadership role in the establishment of programs to encourage conservation of energy and reduce greenhouse gas emissions. Intensification or new development would require expansion of these utilities to meet the needs of future users within the development. The PROJECT contains policies on how to evaluate growth, determine facilities needs, and to require development to pay its fair share of costs. It also calls for the establishment of a centralized development monitoring system to evaluate projected strain on utility systems, and cooperative planning and joint use with other agencies. Furthermore, PROJECT policies encourage best management practices for construction and operation of new development and implementation of resource conservation measures to reduce demand for water and energy, and concentrating development in infill areas will allow for efficiencies in the provision of utilities to more users. Additionally, future county development will require new or improved public utilities infrastructure due to the increased demand for water, wastewater, energy, solid waste, stormwater, and communications services associated with the development. The water supply for the PROJECT is anticipated to meet water demands for the Year 2030 and is not considered a significant impact, and is described in Section IV.E above. SANDAG is updating the Regional Energy Plan, including new energy conservation measures; without such a plan and because the specific location and intensities of development are not known at this time, implementation of future projects and actions could result in the demand for excessive amounts of energy. The

impacts to these public utilities could be considered significant and unavoidable impacts. Potential incremental impacts associated with the construction of future public utilities infrastructure improvements, when viewed in connection with the increased regional demand for such improvements, may be considered cumulatively significant and unavoidable.
Because the specific location and intensities of development are not known at this time, the PROJECT does not propose any specific construction and siting of water, wastewater, storm water, solid waste, or communications infrastructure. Therefore, it remains possible that a significant impact could occur with these utilities on other environmental issue areas. The PROJECT establishes a foundation for future community plan updates, discretionary projects, and other actions; impacts of public utilities will be identified at the project level and may be found to have a significant effect on environmental issue areas. The PROJECT further establishes a mitigation framework to guide future plans and projects in the development of mitigation measures which would reduce potential significant impacts. In addition to compliance with existing and future goals and regulations, site-specific measures may reduce impacts to a level below significant. Additional mitigation measures may also be infeasible at reducing project-level or cumulative impacts to below a level of significance, and therefore the impacts could remain significant and unavoidable.

O. Transportation/Traffic/Circulation/Parking (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Increases the number of roadway miles at a Level of Service E or F on the planned transportation network;
- Increases the percent of daily vehicle miles traveled at a Level of Service E or F on the planned circulation system;
- Decreases the percent of multimodal trips in the City's transportation system; or
- Creates an average demand for parking that substantially exceeds the available supply.

Facts in Support of Findings: Transportation forecasts, demands, improvements, and levels of service are projected to the Year 2030 in the SANDAG Regional MOBILITY 2030 Plan. This plan accounts for the impacts to the transportation system due to implementation of the PROJECT as well as other county growth and development. The SANDAG model demonstrates a reduction in Citywide LOS E and F roadway miles and percent of daily vehicle miles traveled at LOS E or F as a result of proposed improvements, however there are many uncertainties associated with the multi-year implementation of the PROJECT and regional transportation plans that could result in traffic impacts at various points in time. As well, a major update to SANDAG's Plan is underway which could result in the adoption of different strategies and projects that are unknown at this time. As a result, there is a potential for an increase in the number of roadway miles or an increase in the percent of daily vehicle miles traveled at LOS E and F, a significant impact. When viewed in connection with future development elsewhere in the county, these could create incremental impacts, and would be considered cumulatively significant and unavoidable.

A major focus of the PROJECT is to create more walkable and transit-oriented communities. Policies address the need for multimodal system investments, an interconnected street and path system, and development of a Pedestrian Master Plan. However, the SANDAG transportation model forecasts that while transit trips will increase on the basis of both absolute number and percentage of mode travel, the percentage of all transit trips by pedestrian and bicycle trips would decrease, though the absolute number of pedestrian and bicycle trips would still increase. Furthermore, uncertainties exist in the SANDAG Plan, timing or funding of improvements, and the update which may result in different strategies, projects and outcomes. Therefore, there is a potentially significant impact to the percent of multimodal trips in the City's transportation system as a result of implementation of the PROJECT. The PROJECT allows for growth and development which may increase the amount of automobile traffic, and subsequently may result in impacts to neighborhood traffic and parking. While policies and existing regulations are designed to minimize parking impacts, there may still be localized parking impacts in the future. Therefore, impacts to parking are considered significant and unavoidable at the project-level of analysis. Project-level impacts related to excessive parking demand and decreased multimodal trips in the City's transportation system are specific to the PROJECT and not a cumulative concern.

The PROJECT serves as a guide for future development projects and community plan updates, and at these levels specific traffic or parking studies may be made. Because the PROJECT does not propose specific locations for growth and resultant intensities of land uses, the specific traffic and parking impacts cannot be measured at this level of analysis, though impacts may occur. Therefore, the project-level impacts of increased traffic congestion, use of multimodal trips, or parking demand remain significant and unavoidable. A mitigation framework has been established to guide future mitigation measures to be developed for future community plans, specific plans, projects or other plans or developments. In addition to existing regulations and policies, the framework includes project-specific mitigation to enhance walkable communities, the street and freeway system, transportation demand management plans, bicycling, and parking management, although the project level impact may remain significant and unavoidable where no feasible mitigation exists. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this level of analysis, the project-level and cumulative traffic, circulation and parking impacts would still remain significant and unavoidable.

P. Visual Effects and Neighborhood Character (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Results in a substantial change in the topography or ground surface relief features of any areas of the City;
- Allows development that is incompatible in shape, form, or intensity such that public views from designated open space areas, scenic highways or to any significant visual

landmarks or scenic vistas (e.g. mountains, bays, rivers, ocean) would be substantially blocked; or

- Result in projects that would negatively and substantially alter the existing character of the City's distinct neighborhoods.

Facts in Support of Findings: The PROJECT anticipates future growth to be focused into mixed-use activity centers, and encourages infill development in selected areas to be identified through future community plan updates. As well, the PROJECT guides the development of remaining vacant, developable land. Because of this, development may require changes to landforms through site-specific grading. Furthermore, development could result in a change in building mass, form and intensity in many areas of the City which may be significantly different from other neighboring development in its proximity and considered incompatible with surrounding neighborhood character. New and greater intensity or mass of development could also block a view from a designated open space, view corridor or scenic highway to any significant visual landmark or scenic vista. Significant views are typically those that overlook a body of water, canyons and open space, and/or the Centre City skyline.

The PROJECT does provide policies to help reduce the potential for significant impacts to visual effects, such as preserving open space, targeting growth into compact villages with strong urban form and design policies, reducing visual impacts to scenic areas or viewsheds through design guidelines like setbacks and screening, and addressing development adjacent to natural features. As well, the City identifies Environmentally Sensitive Lands to help protect, preserve and restore the quality of hillside, canyon and other significant landforms for habitat, flood control, visual aesthetic, and other purposes. Despite these policies, there is a possibility that implementation of the PROJECT could change the landscape of the built environment and result in grading or a change in ground surface relief in order to maximize the development potential of a particular site, or could allow development to occur which would alter the character of existing neighborhoods and/or block scenic viewsheds from public spaces. Because the PROJECT area constitutes a large portion of San Diego county, incremental impacts related to substantial blocking of public views from designated open space areas, scenic highways or to any significant visual landmarks or scenic vistas, substantial changes in topography or to ground surface relief features, and negative and substantial alteration of the existing character of the plan area are also considered cumulatively significant and unavoidable.

Because the PROJECT does not propose specific developments, it is infeasible at this time to determine the level of impact to topography or visual resources, including compatibility with surrounding development or public views to a significant visual landmark. This assessment would be made at the community plan, discretionary project, or other level. Because significant impacts to topography or visual resources could occur, at the PROJECT level the impact remains significant. Furthermore, no specific mitigation is proposed at this time which would reduce and project-level impacts to a level below significant. Rather, the PROJECT establishes a framework which focuses on compliance with existing regulations, development standards and the environmental review process. Future projects will develop site-specific mitigation measures around this framework to lessen the impacts of individual plans or projects. Still, mitigation

could prove infeasible to reduce visual effects to a level below significant, and both project-level and cumulative impacts would remain significant and unavoidable.

Q. Water Quality (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Results in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body; or
- Impacts local and regional water quality or supply, including groundwater.

Facts in Support of Findings: The PROJECT anticipates future growth to be focused into mixed-use activity centers, and encourages infill development in selected areas to be identified through future community plan updates. As well, the PROJECT guides the development of remaining vacant, developable land. Most water pollutants in the City have a man-made origin, such as chemical, roadway, or refuse pollutants, and therefore increasing the population and development could increase the amount of pollutants discharged into the aquatic ecosystem. The infill development or conversion of vacant lands could increase the amount of impervious surfaces, further exacerbating the impact of pollutants in runoff. Erosion could contribute the sediment load in downstream surface waters and affect the aquatic ecosystem. The City currently contains impaired water bodies and any development upstream of these could further exacerbate the degree of impairment. Water pollution anywhere in the system has the potential to affect groundwater or any other parts of the system. Because the PROJECT does not propose specific development, it is infeasible to determine the degree of impact to water quality, although the project-level impact may be significant. Additionally, as the county develops in response to future population growth, water quality impacts to regional watersheds, some of which are located within both the PROJECT area and other jurisdictions, would occur. This is a significant impact. Potential incremental water quality impacts, when viewed in connection with water quality impacts from development in other jurisdictions of the county, may be considered cumulatively significant and unavoidable.

A mitigation framework has been established to guide the development of specific mitigation measures for future community plans, specific plans, projects or other plans or developments. This framework includes compliance with existing policies and regulations, including the Watershed Urban Runoff Management Program, although compliance with these may not be enough to reduce potential impacts to a level less than significant. For these projects, mitigation may be implemented to preclude impacts such as increasing on-site filtration, utilizing natural drainage systems or creating alternative drainage to direct flow away from impaired receiving bodies in the site design, directing flows away from sensitive habitat, reducing impervious surfaces or increasing use of vegetation. Because these mitigation measures will be evaluated for future plans or projects, it cannot be determined at this time whether mitigation would be sufficient to reduce impacts to a level less than significant. Therefore, project-level and cumulative impacts after mitigation could remain significant and unavoidable.

R. Growth Inducing Impacts (Project-level and Cumulative)

Potential Impacts: The PROJECT could have significant project-level and cumulative impacts to the following environmental issues:

- Directly or indirectly fosters economic growth, population growth, or additional housing;
- Removes obstacles for growth; or
- Encourages or facilitates other activities that could significantly affect the environment.

Facts in Support of Findings: By definition, the PROJECT is intended to manage and address future growth in the City through goals and policies calling for redevelopment, infill, and new growth in compact, mixed-use activity areas that are pedestrian-friendly and linked to the regional transit system. Actual centers of growth and specific mix of uses, architectural form, needed public facilities, and the types of public spaces will be determined through community plan updates following adoption of the PROJECT. As well, the PROJECT contains policies to guide the development of usable, vacant land in the City. Therefore, the PROJECT is growth accommodating because it provides this direction for the planning and management of population growth and growth inducing in that it facilitates economic expansion through an increase in livability and productivity of community centers. The expansion of infrastructure described in Public Services and Facilities and Public Utilities sections above could further remove existing obstacles to growth and would also be considered growth inducing. While it is unable to be determined at this level of analysis, additional facilities or infrastructure may cause construction or operation activities that significantly affect the environment. Because future growth in the county is similarly anticipated under regional growth plans, the PROJECT will incrementally contribute to the cumulatively significant impact of growth inducement and growth accommodating development elsewhere in the county. Therefore, these project-level and cumulative impacts are therefore considered significant and unavoidable.

S. Global Warming (Cumulative)

Potential Impacts: The PROJECT could have significant cumulative impacts to the following environmental issues:

- Results in increased emissions of greenhouse gases which cumulatively contribute to global climate change impacts.

Facts in Support of Findings: Future discretionary development projects anticipated to occur as a result of PROJECT implementation are expected to result in increased greenhouse gas (GHG) emissions, largely due to increased vehicle miles traveled (VMT) and increased energy consumption. Projected 2020 GHG emissions associated with VMT are calculated to be approximately 24 percent higher than 1990 levels and about 16 percent higher than existing levels. In addition, energy consumption associated with population growth and development that occurs in accordance with the PROJECT will also result in substantial levels of GHG emissions

in excess of existing and 1990 levels. However, the City has already reduced a sizeable portion of solid waste-related GHG emissions, and such emissions are anticipated to be a considerably lower percentage of the City's total future GHG emissions relative to existing conditions.

Although the City's Climate Protection Action Plan includes measures to reduce GHG emissions in the City by 2010, these measures would not substantially reduce GHG emissions associated with discretionary development projects under implementation of the PROJECT. In addition, emission reduction measures targeting sources of GHG called for in AB 32 have not yet been adopted, and it is unknown at this time if these measures will apply to local governments. Therefore, development under the PROJECT would result in substantial increases in GHG emissions primarily associated with increased VMT and energy consumption. Since future GHG emissions are projected to exceed existing and 1990 levels by sizeable margins, the incremental GHG emissions associated with development under the PROJECT would cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions. By generating increased levels of GHG emissions that exceed 1990 levels by a substantial margin, the PROJECT could potentially conflict with the state's requirement under AB 32 to reduce statewide emissions to 1990 levels by 2020.

In response to comments received on the October 2006 Draft General Plan, revisions were made to emphasize policies and programs which would reduce the greenhouse gas emissions by the PROJECT. In addition, a mitigation framework has been established to guide specific mitigation included in the General Plan Action Plan. This framework includes a comprehensive set of policies to reduce the GHG emissions of future development, the existing community-at-large and City operations including: (1) focusing PROJECT-related development into transit-oriented mixed-use activity centers that promote increased walking, bicycling, and use of public transit; (2) supporting alternative modes of transportation through compatible land use development and supportive funding; (3) improving energy efficiency in the transportation sector and in buildings and appliances; (4) reducing the Urban Heat Island effect; (5) minimizing GHG emissions associated with landfills; (6) using sustainable or "green" building techniques and self-generation of energy using renewable energy sources; (7) minimizing energy use through site design, building orientation, and tree-planting; ((8) maximizing waste reduction and diversion; (9) implementing water conservation measures; and (10) implementing parking strategies that are designed to help reduce the number and length of automobile trips. Mitigation framework measures identified under Air Quality and Public Utilities impact sections will also be implemented to avoid or reduce GHG emissions associated with specific future projects.

Since these mitigation measures will be applied to specific future plans or projects that are not proposed at this time, a determination that mitigation would be sufficient to reduce cumulatively significant global warming impacts to a level less than significant cannot be made. Therefore, cumulative global warming impacts could remain significant and unavoidable after mitigation.

VI. FINDINGS REGARDING ALTERNATIVES (PUBLIC RESOURCES CODE §21081(a)(3))

The City, having reviewed and considered the information contained in the EIR, including the AIS, finds pursuant to Public Resources Code §21081(a)(3) and Guidelines §15091(a)(3) that (i) the EIR considers a reasonable range of Project alternatives 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 (ii) specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the project alternatives identified in the EIR as well as other alternatives which would reduce the environmental impacts to below a level of significance. The EIR for the PROJECT considered the following alternatives: (1) No Project; (2) Enhanced Sustainability; (3) Increased Parking Management; (4) Concentrated Growth; (5) Alternative Location; (6) City of Villages Increased Growth Alternative; (7) General Intensification Alternative; (8) Reduced Density/Maintain Existing Neighborhood Character; and (9) Reduced Industrial Lands Protections. Alternatives 5-9 were determined to be infeasible and rejected from further analysis as described below in Section VI(E).

A. No Project Alternative

This alternative is required under CEQA Guidelines sec 15126.6(e)(2). Under this alternative, the PROJECT would not be implemented and projected future growth would occur in accordance with the *1979 Progress Guide and General Plan*, the 2002 Strategic Framework Element, and the 2006 Housing Element. This alternative would only partially implement project objectives pertaining to implementing the City of Villages strategy and qualifying for regional transportation funds in the absence of a coordinated General Plan framework. It also would place industrial/employment lands at greater risk than under the PROJECT due the lack of development of new industrial lands protection policies. The objective of updating public facilities guidelines and strategies for deficiencies not addressed in the 1979 General Plan would likely not be met, though other Project objectives would likely be met.

Potential Impacts: A summary of the environmental impacts of the No Project alternative is provided in Table 7.4-1 of the EIR. Similar to the PROJECT, this alternative would result in significant and unavoidable impacts to all issue topics and areas. The degrees of impact for the issue areas would be similar to or greater than the impacts under the PROJECT. Specifically, air quality, land use, and traffic impacts would be greater than under the PROJECT.

Facts in Support of Findings: The existing General Plan primarily addresses development of vacant land and provision of adequate public facilities in new communities. Because current, developable vacant land only accounts for 3.6 percent of the City's total acreage, a majority of projected population growth would need to be accommodated through infill development or redevelopment of existing urbanized areas. The existing General Plan is therefore out-of-date and largely irrelevant for guiding projected growth through Year 2030. While community plans could still be updated in the absence of an updated General Plan, there would not be a framework in place to implement citywide policies and to achieve citywide goals, and the Strategic Framework Element would not be fully implemented.

Growth under the No Project Alternative would be less likely to result in walkable, transit-oriented developments. Thus, this alternative would likely result in a higher proportion of automobile trips and greater traffic congestion than under the PROJECT. Therefore, this alternative would result in greater air quality impacts, including CO hot spots at intersections in the City, associated with increased vehicular emissions when compared to the PROJECT. Furthermore, there would be greater traffic impacts because of the greater percentage of daily vehicle miles traveled at LOS E or F, and reduced multi-modal trips. Furthermore, without the policies which encourage infill and redevelopment and minimize the potential for associated land use incompatibilities, environmental impacts related to land use incompatibilities associated with infill and redevelopment could be greater over the long-term.

B. Enhanced Sustainability Alternative

This Alternative would add mandatory policies to the PROJECT to enhance the sustainability of future development within the plan area by reducing effects related to energy and water consumption. Policies would include requirements for builders/owners to employ sustainable building techniques in private developments, the installation of recycled water systems for large development projects, and reductions in water consumption associated with existing and future development in the plan area. Language in this alternative is generally stronger than the October 2006 PROJECT which encourages, but does not require, sustainable development. This alternative furthermore would meet all objectives of the PROJECT. Since development of the October 2006 PROJECT, changes have been made to incorporate the principal objectives of this alternative, such as plans and policies directed at limiting emissions of greenhouse gases, reducing water or energy demands, providing incentives or other methods of ensuring sustainable development methods in development projects into the Draft General Plan.

Potential Impacts: A summary of the environmental impacts of the Enhanced Sustainability alternative is provided in Table 7.4-1 of the EIR. Similar to the PROJECT, this alternative would result in significant and unavoidable impacts to all issue topics and areas at the program level of analysis. However, there could be lesser impacts to air quality, hydrology, mineral resources, public utilities, or water quality relative to the PROJECT.

Facts in Support of Findings: Relative to the PROJECT, as long-term development occurs under the Enhanced Sustainability Alternative, the prevalence of sustainable buildings could increase the use of energy efficient designs, the use of recycled building materials, landscaped "green roofs", and renewable energy production such as installation of solar panels, as well as requirements for recycled water systems, and reduced water consumption. These techniques could (1) significantly decrease the amount of air pollution associated with the burning of fossil fuels as consumption of nonrenewable energy decreases, (2) significantly decrease the rate and amount of runoff and significantly increase the absorption rates of runoff through landscaping technology, (3) result in reuse of building materials, thereby reducing demand for raw mineral resources, (4) significantly reduce the need for construction of new or physically altered public utilities infrastructure associated with water, energy, storm water and solid waste, and significantly reduce consumption of available water supplies, and (5) significantly reduce the amount of storm water and pollutants that enter the storm drain system and eventually the

aquatic environment. All other environmental issues would be expected to have the same impact per the facts identified in Sections IV and V.

C. Increased Parking Management

This alternative expands upon the currently available parking management tools by expanding implementation of Community Parking Districts and residential permit parking districts throughout the City, and would also increase parking meter fees and extend the hours of operation for existing parking meters. Under this alternative, there would be a substantial reduction of free on-street parking in the City and an increase in parking-related revenue. Though the PROJECT incorporates the principal environmental objectives of this alternative in a revised Draft General Plan, the Increased Parking Management alternative is analyzed as a means for further reducing the environmental effects of the PROJECT related to air quality and traffic. This alternative furthermore would meet all project objectives of the PROJECT.

Potential Impacts: A summary of the environmental impacts of the Increased Parking Management alternative is provided in Table 7.4-1 of the EIR. Similar to the PROJECT, this alternative would result in significant and unavoidable impacts to all issue topics and areas at the program level of analysis. However, there could be lesser impacts to air quality or traffic relative to the PROJECT.

Facts in Support of Findings: Increased parking meter fees and enforcement hours will increase the cost of parking, and this alternative would further reduce the availability of free on-street parking. This would serve to reduce the number of automobile trips and vehicle miles traveled and increase in the number of multi-modal trips as some trips would be replaced by alternative modes of travel. In addition to the direct benefits on transportation, the reduction in vehicular trips would reduce emissions associated with vehicular use, which would have a corresponding reduction in air quality impacts. All other environmental issues would be expected to have the same impact per the facts identified in sections IV and V.

D. Concentrated Growth

This alternative intends to focus projected growth into four sub-areas of the City that are served by high quality transit. The infill and redevelopment would be focused on the Downtown San Diego and Uptown communities, and in Urban Village Centers within the Mission Valley/Morena/Grantville, University/Sorrento Mesa, and Midway-Pacific Highway sub-areas to a greater extent than is envisioned under the PROJECT. This alternative would only partially implement the PROJECT objectives designed to create compact and walkable mixed-use villages of different scales, as there would be more concentrated growth in fewer communities, and integrating a regional transportation network that links communities to each other as fewer communities would observe the transportation benefits under the alternative. Furthermore, PROJECT objectives such as creating balanced communities that offer opportunities for all San Diegans and share citywide responsibilities, and offering high quality, affordable, and well-maintained public facilities would be difficult to meet for similar reasons.

Potential Impacts: A summary of the environmental impacts of the No Project alternative is provided in Table 7.4-1 of the EIR. Similar to the PROJECT, this alternative would result in significant and unavoidable impacts to all issue topics and areas at the program level of analysis. However, there could be lesser impacts to population and housing, and greater impacts to geologic conditions, health and safety, historic resources, or land use relative to the PROJECT.

Facts in Support of Findings:

Environmental impacts would be greater in the four identified sub-areas, but would likely decrease in other areas of the City. This would be contrary to the proposed PROJECT land use recommendations that call for the development of compact, mixed-use centers in other communities (communities outside of the four sub-areas). Overall secondary environmental impacts associated with this alternative would result in greater land use impacts when compared to the PROJECT.

This alternative would result in less land area being targeted for infill and redevelopment as compared to the PROJECT, so there would be fewer older housing units affected, and reduced construction impacts to provide replacement housing. However, there would be greater concentrations of people living in areas identified as a "Moderate to High" or "Low to Moderate" geo-technical relative risk area, which could result in a greater number of people or property exposed to geologic hazards such as groundshaking, fault rupture, landslides and others, and there could be greater numbers of people exposed to health and safety impacts. Because proposed sub-areas contain a greater proportion of the City's historical resources, infill and redevelopment of these areas in greater amounts that proposed under the PROJECT would have a corresponding greater risk to historical resources under this alternative. Due to the high cost of land and the scarcity of vacant developable land in the four sub-areas, it would be more difficult to secure the population-based park lands needed to provide public facilities in accordance with the General Plan, as compared to the PROJECT.

All other environmental issues would be expected to have the same impact per the facts identified in sections IV and V. Some impacts such as an increase in transit trips and related decrease in vehicular trips in targeted areas of the City, and the associated benefit of lesser air quality and traffic impacts, would be offset by the increase in vehicular-related emissions or congested roadway miles projected for non-targeted areas of the City. Likewise, the environmental effects from more intense development in some sub-areas would be offset by the decrease in development in other sub-areas of the City.

E. Alternatives Considered but Rejected From Further Analysis

1. Alternative Location

According to the State CEQA Guidelines, the range of alternatives should include evaluation of alternative "locations that would avoid or substantially lessen any of the significant effects of the project" (Guidelines §15126.6(f)(2)(A)). The PROJECT is a General Plan, which guides the future development of the City. Since the PROJECT is specific to the City, no feasible alternative location exists that could be used for meaningful analysis.

2. City of Villages Increased Growth Alternative

This alternative proposes 17,000 to 37,000 multifamily dwelling units to be added to areas of the City with a high propensity for village development as shown in Figure LU-1 of the PROJECT. This analysis would be similar to the analysis undertaken for the Strategic Framework Element (SFE) Final EIR, which identified citywide impacts of these additional units, but not site-specific analysis. During the comment period for the 2002 SFE FEIR, members of the public recommended that village sites be designated through the community plan update process, with attention to public facilities, traffic and neighborhood character issues among others.

Mandating the addition of units to specific areas of the City with high village propensity would be inconsistent with the City's established community planning program, which identifies community plans as the appropriate vehicle for determining land use designations. Furthermore, the alternative would be unlikely to be implemented since the similar proposal under the SFE faced intense public opposition and was rejected by the City Council in 2002.

3. General Intensification Alternative

This alternative would add approximately 17,000 to 37,000 residential units to the City similar to the City of Villages Increased Growth Alternative, except that the units would be distributed equally across the city irrespective of village propensity.

This alternative was rejected from further analysis because accommodating future growth equally through the communities of the City irrespective of village propensity would not meet several of the primary PROJECT objectives. Most importantly, this alternative would not facilitate the growth strategy of developing walkable, mixed-use villages, an efficient regional transportation network, a clean and sustainable environment, and other objectives of a smart growth plan. Under this alternative, all communities would be forced to accommodate their proportion of the new residential units regardless of environmental considerations. This could lead to greater pressures on environmentally sensitive lands, less efficient provision of infrastructure and public services, and likely increases to environmental impacts associated with traffic, air quality, biological resources, land use, public facilities, and possible other topics, particularly within communities largely with a designated low-propensity for village development. As with the City of Villages Increased Growth Alternative, there is a strong desire by members of the public for locating growth during the community plan update process, and therefore this alternative would be rejected at PROJECT level of analysis.

4. Reduced Density/Maintain Existing Neighborhood Character

This alternative was designed to reduce citywide growth across all neighborhoods in order to maintain existing neighborhood character. Residential density reductions would be determined under the community plan update process. However, the number of residential units permitted under any community plan, particularly villages identified in Figure 2.4-1 with a high-propensity for smart growth development (village areas that already exhibit higher-density, transit-oriented village characteristics, and areas that may have a propensity to develop as village areas), would be limited to be consistent with the alternative.

This alternative would reduce the City's overall housing stock and increase the demand for housing. Because population growth and demand for housing would continue to increase over time, the alternative would likely force needed housing units development and projected population outside of the City into other jurisdictions, and result in the overcrowding of existing units or the division of existing single-family homes into multiple units, or other changes to existing neighborhoods as a result of increased demand and limited housing supply. Over the long-term, this pattern of growth would likely increase the environmental impacts associated with agricultural resources, air quality, biological resources, hydrology, paleontological resources, noise, traffic, water quality, and possibly others. Furthermore, this alternative would reduce the City's housing capacity which would be inconsistent with the City's adopted housing element and state requirements. For these reasons, this alternative was rejected from further analysis as infeasible and inconsistent with PROJECT goals and policies.

5. Reduced Industrial Lands Protections.

This alternative would eliminate the policies of the PROJECT prohibiting (1) the conversion of lands to non-industrial uses, (2) the collocation of residential or non-industrial uses into industrial uses on Prime Industrial Lands, and (3) discretionary projects for public assembly or sensitive receptor land uses on Prime Industrial Lands. Because this alternative is analyzed as an alternative to the Prime Industrial Lands policies of the PROJECT, and half of goals associated with industrial lands would not be achieved with limited or no benefit to the achievement of other policies and goals under the PROJECT, this alternative was rejected from further analysis.

VII. STATEMENT OF OVERRIDING CONSIDERATIONS (PUBLIC RESOURCES CODE §21081(b))

Public Resources Code §21081(b) prohibits approval of a project with significant, unmitigable adverse impacts resulting from infeasible mitigation measures or alternatives unless the agency finds that specific overriding economic, legal, social, technological, or other benefits of the PROJECT outweigh the significant effects on the environment. The PROJECT could have significant, unmitigable, adverse impacts, as described above. However, the City Council finds that those impacts are outweighed by the following specific overriding economic, legal, social, technological, or other benefits of the PROJECT.

The City Council, having considered all of the foregoing, finds that the following specific overriding economic, legal, social, technological, or other benefits of the PROJECT outweigh the aforesaid significant, unmitigable effects on the environment. The City Council expressly finds that the following benefits would be sufficient to reach this conclusion:

1. The PROJECT protects the quality of life for existing and future residents through goals and policies designed to achieve a desired vision for the City that incorporates smart growth principles, concepts of sustainable development and resource management, and environmental protection.

2. The PROJECT guides the City in expanding the local economy, which provides jobs, attracts and retains businesses, supports diverse and vibrant commercial areas, recognizes and encourages technological innovations, and generates sufficient revenue to support various local programs and services.

3. The PROJECT promotes development which accommodates anticipated population growth and guides physical development towards a desired image that is consistent with the social, economic and aesthetic values of the City.

4. The PROJECT provides a guiding framework for the completion of community plan updates which will allow individual communities and neighborhoods to provide direction for their future growth and successful economic development while maintaining their unique characters.

5. The PROJECT provides mitigation frameworks to guide community plan updates and development projects in order to reduce environmental impacts of future plans and projects.

6. The PROJECT supports the policies and goals of the most recent Housing Element adopted by the City in 2006, and allows the City to meet future housing needs for the growth in population, including affordable housing.

7. The PROJECT improves mobility through development of a more balanced, multi-modal transportation network, encouraging residential and workplace development near transit centers, and supports the goals and policies of adopted regional transportation plans.

8. The PROJECT provides for public facilities and services needed to serve the existing and future population and establishes goals and policies to enhance public safety.

9. The PROJECT allows the City to become an international model of sustainable development and provide for the long-term conservation and management of the rich natural resources that help to define the City's identity, contribute to its economy, and improve its quality of life.

10. The PROJECT guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources, improves the quality of the built environment, maintains the character and identity of communities, and contributes to the City's economic vitality.

11. The PROJECT addresses expected impacts of global climate change by facilitating sustainable development, reducing greenhouse gas emissions within the City, and participating in the worldwide efforts to reduce effects such as extreme weather phenomena, sea level rise, and destruction of ecosystems.