

ATTACHMENT 1
CITY OF POWAY
ENVIRONMENTAL INITIAL STUDY
AND CHECKLIST

A. INTRODUCTION

This Environmental Initial Study and Checklist, along with information contained in the public record, comprise the environmental documentation for the proposed project as described below pursuant to the requirements of the California Environmental Quality Act (CEQA). Based upon the information contained herein and in the public record, the City of Poway has prepared Negative Declaration for the proposed project.

B. PROJECT INFORMATION

1. Project Title: 2020-2029 City of Poway Housing Element of the General Plan; Environmental Assessment (EA) 21-001; General Plan Amendment (GPA) 21-001
2. Lead Agency Name and Address: City of Poway, Development Services
13325 Civic Center Drive, Poway, CA 92064
3. Contact Person and Phone Number: Scott Nespor, Associate Planner, 858-668-4656
4. Project Location: Citywide (Exhibit A – Attached)
5. Project Sponsor's Name and Address: City of Poway
13325 Civic Center Drive, Poway, CA 92064
6. General Plan Designation: Citywide - Not Applicable for adoption of a Housing Element Update
7. Zoning: Citywide - Not Applicable for adoption of Housing Element Update
8. Description of Project:

This project is a General Plan Amendment to update and adopt the City of Poway 2020-2029 Housing Element for the Sixth Cycle planning period from June 30, 2020 to April 15, 2029 and amend the text of the Community Development (Land Use) Element of the General Plan to reflect the updated Housing Element. The Housing Element update, which is one of the seven City's General Plan elements, is a policy document designed to provide the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. California Government Code Section 65580 states the following regarding the importance of creating housing elements:

- a. The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.

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- b. The early attainment of housing goals requires the cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians of all economic levels.
- c. The provision of housing affordable to low- and moderate-income households requires the cooperation of all levels of government.
- d. Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community.
- e. The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the State in addressing regional housing needs.
- f. Designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the State's housing goals and the purposes of this article.

According to state law, the Housing Element has two main purposes:

- a. To provide an assessment of both current and future housing needs and constraints in meeting these needs; and
- b. To provide a strategy that establishes housing goals, policies, and programs.

The City's Housing Element serves as an integrated part of the General Plan, and is subject to detailed statutory requirements, including a requirement to be updated every eight years, and a mandatory review by the California Housing and Community Development (HCD). The proposed Housing Element update is an over eight-year plan for the 2020-2029 period.

Pursuant to Government Code Section 65583, a housing element is required to consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. A housing element is required to contain the following:

- An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs (Government Code Section 65583[a]);
- A statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing (Government Code Section 65583[a]); and
- A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation of the policies and achieve the goals and objectives of the housing element (Government Code Section 65583[c]).

The updated housing element includes an over eight-year plan for the 2020-2029 housing cycle that includes all 19 jurisdictions in the San Diego region. The Housing Element update serves as an integrated part of the General Plan, but is updated more frequently, as required by state law, to ensure its relevancy and accuracy. The Housing Element identifies strategies and program that focus on:

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- Matching housing supply with need;
- Maximizing housing choices throughout the community
- Assisting in the provision of affordable housing
- Removing governmental and other constraints to housing investment; and
- Promoting fair and equal housing opportunities.

The City's Housing Element update contains the following components:

- A profile and analysis of the City's demographics, housing characteristics, existing and future housing needs, and fair and equal housing opportunities and constraints (Chapter 2, Community Profile).
- A review of the constraints to housing production and preservation. Constraints include potential market, governmental, policy, and environmental limitations to meeting the City's identified housing needs (Chapter 3, Constraints).
- An assessment of resources available to meet the City's objectives regarding housing production and preservation and its ability to further fair housing. Resources include land available for new construction and redevelopment, an analysis of site constraints and the site's ability to further fair housing, as well as financial and administrative resources available (Chapter 4, Housing Resources).
- A statement of the housing plan to address the City's identified housing needs, including housing goals, policies, and programs (Chapter 6, Housing Plan).

Regional Housing Needs Allocation (RHNA)

The Regional Housing Needs Allocation (RHNA) is mandated by State law as part of the periodic process of updating the local housing element of the General Plan. The RHNA process begins with the regional determination figure (the total number of housing units needed to meet housing needs in the SANDAG region) issued by HCD, followed by an allocation to each jurisdiction within the region (specific number of units allocated to each jurisdiction). For the 2020 to 2029 Housing Element, the regional determination was based solely on projected housing need during an over eight-year planning period. Recent changes to State law added a requirement that existing housing needs must be incorporated in the regional determination by housing need indicators such as vacancy rates, job/housing balance, cost burden, and overcrowding.

SANDAG is mandated to allocate the regional housing need set by HCD to jurisdictions in the region. In allocating the region's future housing needs to jurisdictions, SANDAG is required to take the following factors into consideration pursuant to Section 65584 of the State Government Code:

- Market demand for housing;
- Employment opportunities;
- Availability of suitable sites and public facilities;
- Commuting patterns;
- Types of tenure housing;
- Loss of units in assisted housing developments;
- Over-concentration of lower income households; and

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- Geological and topographical constraints.

The RHNA of the SANDAG region was adopted July 2020 covering the planning period from June 30, 2020 through April 15, 2029. The major goal of the RHNA is to assure a fair distribution of housing among cities and counties within the San Diego region, so that every community provides an opportunity for a mix of housing for all economic segments. The housing allocation targets are not building requirements, but goals for each community to accommodate through appropriate planning, policies, and land use regulation. Overall, the region needs to plan for an additional 171,685 units. Allocation targets are intended to assure that adequate sites and zoning are made available to address anticipated housing demand during the planning period.

The City of Poway's share of regional housing needs per the RHNA is a total of 1,319 units for the 2020-2029 Housing Element. Of the 1,319 units allocated to the City, Poway must plan for units affordable to all income levels. The Residential Sites Inventory (Chapter 4, Figure 4-5) identifies vacant land within a variety of residentially-zoned areas including Rural Residential zones, Residential Single Family-4 (RS-4) and Residential Single Family-7 (RS-7). There are several mixed-use properties on the list with land use designations that are Town Center (TC), Commercial Office (CO), Commercial Business (CB), and Commercial General (CG), several of which are within the Poway Road Specific Plan area.

Residential Sites Inventory

State law requires that jurisdictions demonstrate in the housing element that the land inventory is adequate to accommodate that jurisdiction's share of the region's projected growth. As part of this housing element update, the City identified residential sites that could accommodate Poway's future housing needs through an evaluation of vacant and underutilized residential and mixed-use properties with potential for residential development within the timeframe of the housing element. The Residential Sites Inventory (Table 4-5 and Appendix A-1) of the City of Poway 2020-2029 Housing Element provides a detailed survey of parcels that were appropriate for residential development.

Housing Plan

As required by state Housing Element law, the proposed Housing Element update includes a Housing Plan to facilitate and accommodate the provision of housing consistent with the RHNA. The plan would be to implement strategies and programs intended to address a number of important housing-related issues and achieve the City's overarching housing goal, which states:

IT IS THE GOAL OF THE CITY OF POWAY TO PROVIDE ADEQUATE APPROPRIATE HOUSING OPPORTUNITIES TO MEET THE NEEDS OF CURRENT AND FUTURE RESIDENTS.

The following is a summary of the key programs that will be included in the Housing Plan. Some of these are the continuation of the 2013 Housing Element as follows:

Conservation of Existing Housing

- Maintain Rehabilitation Loans for Low- and Moderate-Income Households, as funding becomes available
- Continue to enforce existing Condominium Conversions Regulations

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- Continue to maintain the Mobile Home Park Zone
- Continue to enforce Construction Codes
- Continue to maintain Neighborhoods Revitalization
- Continue to maintain and enhance Resident Services
- Continue to fund Nonprofit Housing Development Corporations, as funding becomes available
- Continue to monitor Affordable Housing Projects
- Develop and implement a Comprehensive Maintenance Agreement for Affordable Housing Developments

Development of New Housing

- Develop new Rental Housing
- Continue to develop new Affordable Housing on Parcels with the Affordable Housing Overlay Zone (AHOZ) Designation
- Implement Mixed-Use Development Standards
- Continue to collect In-Lieu fees and monitor the City's Inclusionary Housing Ordinance
- Continue allowing Poway Housing Authority to retain, promote, and provide affordable housing and maintain reporting
- Implement Zoning Amendments for Special Needs Housing (e.g., Low Barrier Navigation Centers, Transitional and Supportive Housing, Emergency Shelters, Residential Care Facilities, Agricultural Worker Housing, Employee Housing, Housing with Reasonable Accommodations, Single-Room Occupancy)
- Continue to provide for Special Needs Housing including determining the availability of funding for implementation of housing programs
- Continue the First Time Homebuyer Assistance Program to assist Program participants with loan servicing and resale processing, as funding is available
- Continue offering single-family rehabilitation loans with the Home Enhancement Loan Program, as funding is available
- Maintain Zoning Categories in the General Plan to encourage diversity of development to serve as many types of residents as possible while minimizing land-use related conflicts
- Evaluate Community Land Trusts to determine options for use of the community land trust model
- Continue to provide priority for the provision of services to Lower Income Households
- Continue to enforce City codes, General Plan Polices, and Zoning Regulations
- Continue to monitor Ordinances, User Charges, and Fees
- Update the Poway Municipal Code to comply with current Density Bonus law
- Conduct public outreach and education programs that engage the community to help create an understanding of and support for affordable housing, as funding is available
- Promote Transit-Oriented projects
- Encourage the provision of housing for Extremely-Low Income Households, as funding is available
- Monitor and evaluate No Net Loss requirement per state law
- Monitor and preserve potential At-Risk housing units to ensure adequate sites are available throughout planning period, as funding is available
- Monitor and evaluate the AHOZ Ordinance Development Standards
- Update the Public Safety Element and ensure consistency with the Adopted Housing Element
- Implement SB35 permit streamlining and adopt procedures for processing of new affordable housing projects

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- Amend the City's objective design standards in the General Plan and Municipal Code
- Adopt Development Standards for Parking, Open Space, and Recreational Areas in Floodways
- Review parking requires to ensure parking is not a constraint on housing

Affirmatively Fair Housing Practices

- Continue to provide information on Fair Housing in the Quarterly Newsletter
- Obtain and distribute flyers on Fair Housing from San Diego County
- Obtain and display posters on Fair Housing from the State
- Include Anti-Discrimination Clauses in Deed Restrictions for Affordable Housing
- Continue to assist in addressing Fair Housing questions
- Reduce impediments to Furthering Fair Housing by addressing the contributing factors to ensure, pursuant to AB 686, the City will affirmatively further fair housing by taking meaningful actions in addition to resisting discrimination, that overcomes patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected classes, as defined by state law

Affirmatively Furthering Fair Housing (AB 686)

Pursuant to Assembly Bill (AB) 686 (2018), the Housing Element must include an analysis and determination of consistency with Affirmatively Furthering Fair Housing (AFFH) requirements. AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These actions must, when taken together, address significant disparities in housing needs and in access to opportunity, replace segregated living patterns with truly integrated and balanced living patterns, transform racially and ethnically concentrated areas of poverty into areas of opportunity, and foster and maintain compliance with civil rights and fair housing laws.

To comply with these requirements, the implementation programs of the Housing Element must affirmatively further fair housing and must include an assessment of fair housing. Additionally, the list of opportunity sites suitable for housing development must be identified throughout the City in a manner that affirmatively furthers fair housing opportunities. For purposes of the housing element Residential Sites Inventory, this means that sites identified to accommodate the lower-income portion of the RHNA are not concentrated in low-resourced areas (lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing.

To conduct this analysis, the City utilized the California Tax Credit Allocation Committee (TCAC)/California Department of Housing and Community Development (HCD) Opportunity which can be accessed at <https://www.treasurer.ca.gov/ctcac/opportunity.asp>. Analysis of the fair housing issues was also from the 2020 San Diego Regional Analysis of Impediments to Fair Housing Choice, in which the City of Poway participated. The 2020-2029 Housing Element complies with AB 686 requirements.

Additional Requirements Related to the Opportunity Sites List (AB 1397 and SB 166)

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Since the 5th cycle Housing Element was adopted in 2013, the State Legislature has adopted several bills which strengthen requirements related to the Residential Sites Inventory. Among these, the most significant are AB 1397 (2017) and SB 166 (2017), which imposed several key new requirements. These new requirements are summarized as follows:

Enhanced Requirements: Realistic Development Potential (AB 1397)

Assembly Bill 1397 requires that, for each site included in the Residential Sites Inventory, the City identify the realistic development potential for the site within the eight-year planning period. For non-vacant sites, the methodology used to identify realistic development potential must consider factors such as existing uses, past development trends, market conditions, and the availability of regulatory and/or other development incentives.

No Net Loss (SB 166)

Senate Bill 166 amended the existing No Net Loss Law to require sufficient adequate sites to be available at all times throughout the housing element planning period to meet a jurisdiction's remaining unmet RHNA goals for each income category. To comply with the No Net Loss Law, as jurisdictions make decisions regarding zoning and land use, or development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their housing element site inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category. In particular, a jurisdiction may be required to identify additional sites according to the No Net Loss Law if a jurisdiction rezones a site or if the jurisdiction approves a project at a different income level or lower density than shown in the Residential Sites Inventory. Lower density means fewer units than the capacity assumed in the site inventory.

To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that jurisdiction create a buffer in the housing element inventory of more capacity than required, especially for capacity to accommodate the lower income RHNA. Jurisdictions can also create a buffer by projecting site capacity at less than the maximum density to allow for some reductions in density at a project level. The 2020-2029 Housing Element identifies a 140 unit buffer above the RHNA with credits from Table 4-4 and sites from Table 4-5 (1,459 total housing units provided to meet RHNA, excluding additional sites identified in Table A-1).

Rezoning for Re-Use of Sites to Accommodate Lower Income RHNA (20 percent inclusionary, By-right)

Sites identified to accommodate the lower-income RHNA are subject to additional requirements if they were identified in a previous planning period. Generally, these requirements would apply to the use of a non-vacant site that was identified in the prior planning period's housing element (i.e., 5th cycle Housing Element), or to the use of a vacant site that was identified in two or more consecutive planning periods (i.e., 5th and 4th cycle Housing Elements).

When sites meeting these conditions are used to accommodate the lower-income RHNA, the jurisdiction's housing element must include a program to be completed within three years of the beginning of the planning period to allow residential use by-right at specified densities for housing developments in which at least 20 percent of the units are affordable to lower income households.

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Sites where zoning already permits residential “use by-right” as set forth in Government Code Section 65583.2 (i) at the beginning of the planning period would be considered to meet this requirement.

Three sites are carried over from the previous 2013 Housing Element Cycle that were rezoned with the Affordable Housing Overlay Zone (AHOZ) in 2012 allowing for by-right affordable housing at densities up to 30 du/ac. These sites are owned by the Poway Housing Authority or the City and are identified as "Park and Ride," "Twin Peaks," and "Monte Vista North" in both The 2020-2029 Housing Element and the 2013 Housing Element. With the AHOZ, these sites have a maximum capacity of 165 dwelling units at 30 du/ac and can be approved by-right with no discretionary approval required when affordable housing is built on any of these sites. Additional details are available as a part of the Residential Sites Inventory in Chapter 4.

Replacement Requirements

Government Code Section 65583.2(g)(3) now requires that the housing element include a program to impose housing replacement requirements on certain sites identified in the Residential Sites Inventory. These replacement requirements would require the replacement of units affordable to the same or lower income level as a condition of any development on a non-vacant site consistent with those requirements set forth in State Density Bonus Law (Government Code Section 65915(c)(3).)

The housing replacement requirements would be required for sites identified in the Residential Sites Inventory (Table 4-5) that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income;
- Subject to any other form of rent or price control through a public entity’s valid exercise of its police power; or
- Occupied by low or very low-income households.

No sites identified in the Residential Sites Inventory (Table 4-5) meet these requirements for replacement housing.

Additional Requirements Related to the General Plan – AB 162 (2007), SB 1241 (2012), SB 99 (2019), AB 747 (2019), SB 1035 (2018), SB 379 (2015), and SB 1000 (2016)

Several recent state laws require the City to make updates to other sections of the General Plan alongside the update to the Housing Element. These laws place a particular emphasis on the Public Safety Element, with an expanded focus on planning for flooding, wildfires, and climate change impacts.

Through the City’s annual General Plan implementation review process, the City will ensure internal consistency among the various elements of the General Plan. Additionally, SB 1000 expands requirements surrounding Environmental Justice, however, requirement for an Environmental Justice Element are not applicable to the City of Poway.

9. Surrounding Land Uses and Setting: The City of Poway is east and north of the City of San Diego and south of the city of Escondido. Located in northeast San Diego County, Poway is

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known as “The City in the Country” and prides itself on the fact that over half of the 39.4 square-mile area is preserved as dedicated open space. The community offers a diverse range of housing options, an outstanding school district, a thriving business park, a broad range of dining and shopping opportunities, beautiful parks, and trails. Most of the City’s residentially zoned land has already been developed with a diversity of housing types, including single-family homes, mobile home parks, townhomes, condominiums, and apartments. New mixed-use housing opportunities were developed with the adoption of the Poway Road Specific Plan in 2017.

10. Other Public Agencies Whose Approval is Required: The California Department of Housing and Community Development (HCD) reviews and determines whether the Housing Element update complies with the State of California law and certifies the Housing Element as applicable. No other approvals by outside public agencies are required.
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1 If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.

In accordance with Government Codes Sections 65352.3 and 65342.4 and Public Resources Code Section 21080.3.1, the City of Poway, as Lead Agency, sent a letter to the Tribal Representatives notifying the tribes identified by the Native American Heritage Commission (NAHC) of the proposed project in accordance with AB 52 and SB 18. The City received responses from the Rincon Band of Luiseño Indians tribe, which noted they are not traditionally and culturally affiliated within the geographic area within the City of Poway’s jurisdiction. Responses to the AB 52 and SB 18 consultation notices were received and consultation concluded as discussed in this document.

SUPPORTING DOCUMENTATION:

City of Poway General Plan and EIR for the General Plan
Poway Road Specific Plan and EIR for the Poway Road Specific Plan
City of Poway Municipal Code
City of Poway 2020-2029 Housing Element
City of Poway Subarea Habitat Conservation Plan (HCP)

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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Environmental Factors Potentially Affected: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics <input type="checkbox"/> Biological Resource <input type="checkbox"/> Greenhouse Gas Emissions <input type="checkbox"/> Land Use and Planning <input type="checkbox"/> Population and Housing <input type="checkbox"/> Transportation <input type="checkbox"/> Mandatory Findings of Significance	<input type="checkbox"/> Agricultural /Forestry Resources <input type="checkbox"/> Cultural Resources <input type="checkbox"/> Hazards/Hazardous Materials <input type="checkbox"/> Mineral Resources <input type="checkbox"/> Public Services <input type="checkbox"/> Tribal Cultural Resources <input type="checkbox"/> Wildfire	<input type="checkbox"/> Air Quality <input type="checkbox"/> Energy <input type="checkbox"/> Geology /Soils <input type="checkbox"/> Hydrology / Water Quality <input type="checkbox"/> Noise <input type="checkbox"/> Recreation <input type="checkbox"/> Utilities and Service Systems
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Determination (To be completed by the Lead Agency):

On the basis of this initial evaluation:

<p>I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.</p>	<input checked="" type="checkbox"/>
<p>I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case as revisions in the project have been made by or agreed to by the project proponent and/or mitigation has been agreed to. A MITIGATED NEGATIVE DECLARATION will be prepared.</p>	<input type="checkbox"/>
<p>I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.</p>	<input type="checkbox"/>
<p>I find that the proposed MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.</p>	<input type="checkbox"/>
<p>I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.</p>	<input type="checkbox"/>

 Scott Nespor
 City of Poway

 June 8, 2021
 Date

C. EIS and Checklist

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
I. AESTHETICS. Except as provided in Public Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?				X
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				X
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X
II. AGRICULTURAL AND FORESTRY RESOURCES.				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the				

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ISSUE	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert prime farmland, unique farmland, or farmland of statewide importance (farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d. Result in the loss of forest land or conversion of forest land to non-forest land?				X
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY.				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				

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ISSUE	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c. Expose sensitive receptors to substantial pollutant concentrations?			X	
d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?			X	
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or			X	

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ISSUE	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
impede the use of native wildlife nursery sites?				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?				X
V. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?			X	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			X	
c. Disturb any human remains, including those interred outside of dedicated cemeteries?			X	
VI. ENERGY. Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X
VII. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:			X	
i) Rupture of a known earthquake fault, as delineated on the most			X	

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ISSUE	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b. Result in substantial soil erosion or the loss of topsoil?			X	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?			X	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			X	
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

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VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b. Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?			X	
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working within the project area				X
f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?				X
g. Expose people or structures either directly or indirectly, to a significant			X	

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risk of loss, injury or death involving wildland fires?				
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:			X	
(i) result in substantial erosion or siltation on- or offsite?			X	
(ii) substantially increase the rate or amount of surface runoff in a matter which would result in flooding on- or offsite;			X	
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
(iv) impede or redirect flood flows?			X	
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

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XI. LAND USE AND PLANNING.				
Would the project:				
a. Physically divide an established community?				X
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X
XII. MINERAL RESOURCES.				
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?				X
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
XIII. NOISE.				
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient, noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b. Generation of, excessive ground borne vibration or ground borne noise levels?			X	
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
XIV. POPULATION AND HOUSING.				
Would the project:				
a. Induce substantial unplanned population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through			X	

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extension of roads or other infrastructure)?				
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	
XV. PUBLIC SERVICES.				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services.				
i. Fire protection?			X	
ii. Police protection?			X	
iii. Schools?			X	
iv. Parks?			X	
v. Other public facilities?			X	
XVI. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	
XVII. TRANSPORTATION				
Would the project:				
a. Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				X
c. Substantially increase hazards due to a geometric design feature (e.g.: sharp curves or dangerous			X	

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intersections) or incompatible uses (e.g.: farm equipment)?				
d. Result in inadequate emergency access?			X	
XVIII. TRIBAL CULTURAL RESOURCES				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			X	
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of new or expanded water wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	

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b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c. Result in the determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e. Comply with federal, state and local management and reduction statutes and regulations related to solid waste?			X	
XX. WILDFIRE If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

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XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
<p>a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples or the major periods of California history or prehistory?</p>			X	
<p>b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulative considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</p>			X	
<p>c. Does the project have environmental effects which will cause substantial adverse effects on human beings either directly or indirectly?</p>			X	

D. DISCUSSION OF ENVIRONMENTAL EVALUATION

Please refer to the Environmental Initial Study Checklist Form above when reading the following evaluation.

I. AESTHETICS:

- a. **No Impact.** The 2020-2029 Housing Element identifies an assigned RHNA allocation of 1,319 housing units for development from June 30, 2020 through April 29, 2029. To ensure that significant impacts to scenic vistas or scenic resources do not occur, future development of residential uses will be in accordance with applicable City standards and guidelines, as well as requirements mandated during the environmental review of individual projects. In addition, new residential development, with the exception of new affordable housing, may be subject to a Development Review permit by the City Council that will address project design issues pursuant to the requirements of the Poway Municipal Code (PMC). The same standards, guidelines and Development Review requirements would also address aesthetics maintaining the existing visual character of the individual sites and surroundings and address potential light and glare impacts from a specific design proposal. Affordable housing will be subject to a design review process that will be intended to also maintain the existing visual character of the individual sites and surroundings and address potential light and glare impacts from a specific design proposal. Therefore, adherence to City standards and/or requirements will result in no impacts. No mitigation measures are required.
- b. See response I.a. above.
- c. See response I.a. above.
- d. See response I.a. above.

II. AGRICULTURAL AND FORESTRY_RESOURCES:

- a. **No Impact.** There is no land within the City of Poway that is shown as Prime Farmland, Unique Farmland or Farmland of statewide Importance on the San Diego County Important Farmland map produced by the State Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (California Department of Conservation 2008). Therefore, there would be no impacts to agricultural resources. The 2020-2029 Housing Element does not change any boundaries or the potential for agricultural activities. There are no proposals contained in the Housing Element update to convert Prime Farmland or any farmland of unique or statewide Importance. There are also no proposals that would conflict with existing agricultural zoning or a Williamson Act contract, or result in the conversion of Prime Farmland, Unique Farmland, or Farmland of statewide Importance to non-agricultural use, or conversion or loss of forest land. In addition, because the City does not contain forest land, there is no rezoning or development proposed on forest land, or land

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or timber property zoned Timberland Production. Therefore, there is no impact. No mitigation measures are required.

- b. See response II.a. above.
- c. See response II.a. above.
- d. See response II.a. above.
- e. See response II.a. above.

III. AIR QUALITY:

- a. **Less Than Significant Impact.** The San Diego Regional Air Quality Strategy (RAQS) Plan, amended in 2016 (jointly developed by the San Diego Air Pollution Control District and the San Diego Association of Governments (SANDAG)), provides strategies and pollution controls to improve air quality in the San Diego region. The Land Use Plan and build out projections of the Poway General Plan as well as other jurisdictions in the region were considered when establishing the strategies of the Regional Air Quality Strategies Plan. The Poway General Plan includes strategies that are directed toward reducing air emissions through land use patterns, transportation planning, regional agency cooperation, energy conservation and construction.

New development within the City shall comply with the density and intensity standards outlined in the Community Development (Land Use) Element and the City's current Zoning Ordinance. Implementation of the 2020-2029 Housing Element will be in compliance with the Community Development Element of the Poway General Plan. Any future grading and construction activities associated with development of new housing units will generate temporary increased levels of particulate matter and emissions from construction equipment. In addition, construction activity may generate detectable odors from heavy-duty equipment exhaust in proximity to sensitive receptor locations. Subsequent to construction, an increase in air emissions will occur as a result of increased traffic volumes associated with operation of the proposed on site uses, use of equipment and off-site power, and natural gas consumption. Residential, school, and park uses would be considered receptors sensitive to air emissions generated during construction and operation of new housing developments. Most future affordable housing development projects will be located in areas near transit, commercial and other community services – thereby reducing the demand for vehicle trips. Additionally, energy efficient building materials and compliance with California Green Building Code requirements will be required. Adherence to such requirements will reduce potential impacts associated with air quality to less than a significant level. No mitigation measures are required.

- b. See response III.a. above.
- c. See response III.a. above.
- d. See response III.a. above.

IV. BIOLOGICAL RESOURCES:

- a. **Less than Significant Impact.** The 2020-2029 Housing Element identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 29, 2029. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. Approximately 53 percent of the City's land area is within the Mitigation Area of the Poway Subarea Habitat Conservation Plan (HCP). The Poway Subarea lies in an area of overlap between two sub-regional NCCP plan areas in the San Diego region: the MSCP and the MHCP. The northern edge of the Poway Subarea also overlaps the Focused Planning Area of the San Dieguito River Valley Park. The sites identified as appropriate for low- and moderate-income housing are not located within the Mitigation Area of the HCP. However, it is expected that above moderate-income housing may be constructed within the rural residential areas of the City that coincide with the boundaries of the HCP Mitigation Area. Without a specific project, it is not possible to anticipate how the development of these new housing units will potentially impact sensitive biological resources including riparian habitats, federally protected wetlands or other sensitive natural communities, however, no conflict with the provisions of the HCP is proposed or anticipated and compliance will be required. The HCP requires limitations on the amount of biological impact on each property and a Biological Conservation Easement (BCE) will be required as properties develop. It is also not possible to anticipate how the development of new housing will specifically affect the movement of native resident or migratory fish or wildlife species, adversely affect wildlife corridors or impeded the use of native wildlife nursery sites. The City does have a tree protection ordinance (Poway Municipal Code Chapter 12.32) and a tree inventory on a specific property will be required to evaluate the need to mitigate any tree removals as specified by City codes. To ensure significant impacts to sensitive biological resources do not occur, future development of residential units will be in accordance with applicable City standards and guidelines, the HCP, the State and Federal Endangered Species Act, as well as requirements mandated during the environmental review of individual projects for sites identified for above moderate-income housing. Adherence to such requirements will reduce potential impacts associated with biological resources to less than a significant level. No mitigation measures are required.
- c. See response IV.a. above.
- d. See response IV.a. above.
- e. See response IV.a. above.
- f. **No Impact.** See response IV.a. above.

V. CULTURAL RESOURCES:

- a. **Less than Significant Impact.** CEQA Guidelines Section 15064.5 defines historic resources as any object, building, structure, site, area, place, record, manuscript or other resource listed or determined to be eligible for listing by the

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State Historical Resources Commission, a local register of historic resources, or the lead agency. Generally, a resource is considered to be historically significant if it meets one of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of important persons in the past;
- Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values, or;
- Has yielded, or may be likely to yield, information important in prehistory or history.

According to State CEQA Guidelines (Section 15064.5) and Public Resources Code (Sections 21083.1 and 21083.2), the proposed project would be considered to have a significant impact if it would cause a substantial adverse change to a unique archeological resource.

The 2020-2029 Housing Element update identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 29, 2029. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. To ensure significant impacts to cultural resources do not occur, future development of residential units will be in accordance with applicable City, state and federal standards and guidelines including General Plan policies and Municipal Code regulations. The City has adopted a list of Historical Sites List which is implemented through the City's Historical Structure Ordinance (PMC 17.45). The City's General Plan also includes a Prehistoric and Historic Resources Element, which identifies archaeologically sensitive areas within the City. If a site identified in the Residential Sites Inventory has a high or moderate probability of containing historically sensitive areas, an archaeological report may be required. Any recommended mitigation measures would be made conditions of any project approval. Housing sites must comply with General Plan policies and the PMC where applicable. Adherence to such requirements will reduce potential impacts associated with cultural resources to less than a significant level. No mitigation measures are required.

- b. See response V.b. above.

VI. ENERGY:

- a. **Less than Significant.** No conflict with or obstruction of a state or local plan for renewable energy or energy efficiency is proposed or anticipated. Many sites identified for very low- and low-income housing are allowed by-right, but will be required to conform to General Plan policies and Municipal Code regulations for residential developments. Many of the residential projects that will be developed to meet the RHNA requirement are anticipated to be located near community services, where pedestrian and transit-oriented development is encouraged. Such development may reduce the number of new vehicle trips typically associated with residential projects and, thus, would help to reduce GHG

production resulting from the combustion of fossil fuels for transportation purposes. Adherence to such requirements will reduce potential impacts associated greenhouse gas emissions to less than a significant level. According to the U.S. Environmental Protection Agency, the burning of fossil fuels, along with deforestation, has caused the concentrations of heat-trapping greenhouse gasses (GHGs) to increase significantly in the earth's atmosphere (U.S. Environmental Protection Agency 2012). The increase in GHGs results in global warming, as more heat is trapped in the atmosphere. The 2020-2029 Housing Element would not, in itself, produce environmental impacts. The Housing Element update identifies sites that can accommodate the City's RHNA of 1,319 new housing units through 2029. The potential impacts related to GHG emissions and global warming for any specific future residential projects may be assessed at the time the projects are actually proposed. Mitigation measures would be adopted as necessary, in conformance with CEQA. No mitigation measures are required.

- b. **No Impact.** See response VI.a. above.

VII. GEOLOGY AND SOILS:

- a.i) **Less Than Significant Impact.** The 2020-2029 Housing Element identifies adequate sites in areas already designated for residential and mixed-use use to meet the City's RHNA. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Community Development Element, to a base designation, or to any physical development standards. Though it proposes neither specific development projects nor changes in base zoning, the Housing Element Update identifies opportunity sites that are feasible for development. The 2020-2029 Housing Element could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated impacts have already been accounted for in association with the adopted General Plan or Specific Plan. In addition, any future development projects supported by the 2020-2029 Housing Element would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. The 2020-2029 Housing Element identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 29, 2029. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. Murphy Canyon Fault is the nearest main southern California fault, located approximately nine miles southwest of the City jurisdictional boundary. Three major fault systems within the project vicinity include the Elsinore, San Jacinto and Rose Canyon faults. The active Elsinore fault trends northwest and is about 22 miles northeast of Poway. The San Jacinto fault is also an active northwest-trending fault about 45 miles northeast of Poway. The Rose Canyon fault is located about 16 to 20 miles west of Poway in the Pacific Ocean and is considered potentially active. There is potential for some local damage in the event of a major earthquake along one of these fault systems which could result in significant impacts to facilities in the City. While the potential for onsite rupture cannot be completely discounted (e.g., unmapped

faults could be present), the likelihood for such an occurrence is considered low due to the absence of known faulting within or adjacent to the City. Without specific information regarding the construction methods to be used when building the housing units, it is not possible to determine specific mitigation measures with regard to geology and soils. A Geotechnical Investigation report may be required with the development of any new housing project identified in the Residential Site Inventory and the recommendations of that report will be incorporated into the project design. Many new projects that propose housing for very low-income and low-income can be developed by-right, however, will have to comply with General Plan policies and Municipal Code requirements for soil analyses at individual sites. Adherence to such requirements will reduce potential impacts associated with geology and soils to less than a significant level. No mitigation measures are required.

- a.ii) See response VII.ai. above.
- a.iii) See response VII.ai. above.
- a.iv) See response VII.ai. above.
- b. See response VII.ai. above.
- c. See response VII.ai. above.
- d. See response VII.ai. above.
- e. See response VII.ai. above.
- f. See response VII.ai. above.

VIII. GREENHOUSE GAS EMISSIONS:

- a. **Less Than Significant Impact.** According to the U.S. Environmental Protection Agency, the burning of fossil fuels, along with deforestation, has caused the concentrations of heat-trapping greenhouse gasses (GHGs) to increase significantly in the earth's atmosphere (U.S. Environmental Protection Agency 2012). The increase in GHGs results in global warming, as more heat is trapped in the atmosphere. The 2020-2029 Housing Element would not, in itself, produce environmental impacts. The Housing Element update identifies sites that can accommodate the City's RHNA of 1,319 new housing units through 2029. The potential impacts related to GHG emissions and global warming for any specific future residential projects may be assessed at the time the projects are actually proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. Many sites identified for very low- and low-income housing are allowed by-right, however, will be required to conform to General Plan policies and PMC regulations for residential developments. Many of the residential projects that will be developed to meet the RHNA requirement are anticipated to be located near community services, where pedestrian and transit-oriented development is encouraged. Such development may reduce the

number of new vehicle trips typically associated with residential projects and, thus, would help to reduce GHG production resulting from the combustion of fossil fuels for transportation purposes. Adherence to such requirements will reduce potential impacts associated greenhouse gas emissions to less than a significant level. No mitigation measures are required. No conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases is anticipated or proposed.

- b. **No Impact.** See response VIII.a. above.

IX. HAZARDS AND HAZARDOUS MATERIALS:

- a. **Less Than Significant Impact.** The 2020-2029 Housing Element identifies adequate sites in areas already designated for residential and mixed-use use to meet the City's RHNA. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Community Development Element, to a base designation, or to any physical development standards. Though it proposes neither specific development projects nor changes in base zoning, the Housing Element Update identifies opportunity sites that are feasible for development. The 2020-2029 Housing Element could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated impacts have already been accounted for in association with the adopted General Plan or Specific Plan. In addition, any future development projects supported by the 2020-2029 Housing Element would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. The 2020-2029 Housing Element identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 29, 2029. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. The potential release of hazardous materials is an ongoing condition that is regulated by federal, state and local regulations. This condition will exist with or without the project. The development of residential units will take place on undeveloped or underutilized land. Incidental amounts of hazardous materials may be utilized during the construction and/or occupation of new residential units. In addition, it is anticipated that the nature and quantity of hazardous materials utilized will be typical of those of residential uses and would not be significant.

The City of Poway is not located within an area of influence of an airport land use plan and is not located within two miles of a public airport. It also does not contain any private airstrips. Development of residential units will be consistent with applicable requirements of adopted emergency response/evacuation plans. New residential development may be located adjacent to areas with a significant risk for property damage or injury resulting from wildland fires. The City has adopted the Wildland Urban Interface Code to address potential impacts in these areas. An analysis of potential impacts with regard to hazards and hazardous

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materials will be conducted during the environmental review of specific residential developments for housing. Many new projects that propose housing for very low- and low-income households can be developed by-right, however, will have to comply with General Plan policies and PMC requirements for compliance with requirements for the potential release hazardous materials at individual sites. Adherence to applicable city, state and/or federal regulations will be applied at that time and will reduce the potential impacts to below a level of significance. No mitigation measures are required.

- b. See response IX.a. above.
- c. See response IX.a. above.
- d. **No Impact.** See response IX.a. above.
- e. See response IX.a. above.
- f. See response IX.a. above.
- g. **Less Than Significant Impact.** See response IX.a. above.

X. HYDROLOGY AND WATER QUALITY:

- a. **Less Than Significant Impact.** Under Section 402 of the Clean Water Act, the Regional Water Quality Control Board (RWQCB) issues National Pollutant Discharge Elimination System (NPDES) permits to regulate waste discharges to waters of the nation (rivers, lakes and their tributary waters such as creeks and ephemeral streams). Through the City's entitlement process future residential development would be evaluated on an individual basis for potential violation of water quality standards or waste discharge requirements. Individual projects will be required to incorporate current RWQCB and City of Poway Standard Urban Stormwater Mitigation Plan (SUSMP) and NPDES permit requirements in the project design as appropriate. Individual projects will be required to be designed to treat and slowly release run-off before discharge into the public storm drainage system consistent with SUSMP requirements. Erosion control plans will also be required in association with any grading plans. Many new projects that propose housing for very low- and low-income households can be developed by-right, however, will have to comply with stormwater guidelines and policies in the General Plan as well as stormwater regulations in the City's Municipal Code. By following Best Management Practices (BMPs) as specified by the NPDES permit and an approved Storm Water Pollution Prevention (SWPP) permit during construction, the project will not have a significant adverse effect on water or ground water quality or quantity, nor promote increased erosion. Therefore, no impacts would occur and no mitigation is required.

City codes do not allow construction within a floodway. Construction within a floodplain is allowed if structures are raised one foot above the 100-year flood

level and all weather access. In addition, a hydrology study, completed by a qualified civil or hydrological engineer is required for housing sites. The study must show that there will be no changes to the downstream or upstream 100-year floodplain with the new construction. The 2020-2029 Housing Element identifies adequate sites in areas already designated for residential and mixed-use use to meet the City's RHNA. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Community Development Element, to a base designation, or to any physical development standards. Though it proposes neither specific development projects nor changes in base zoning, the Housing Element Update identifies opportunity sites that are feasible for development. The 2020-2029 Housing Element could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated impacts have already been accounted for in association with the adopted General Plan or Specific Plan. In addition, any future development projects supported by the 2020-2029 Housing Element would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. During the environmental review of any future housing project for housing sites, the development will be reviewed to ensure compliance with city and federal standards for flood protection. New projects that propose housing for very low- and low-income households can be developed by-right, however, will have to comply with General Plan policies and PMC requirements for development within a floodplain. The City requires a Floodplain Development Permit (ministerial) for any development within a floodplain that ensures compliance with all city floodplain regulations. Adherence to applicable city, state and/or federal regulations will be applied at that time and will reduce the potential impacts to below a level of significance. No mitigation is required.

The City is not located adjacent to coastal waters so no impact related to tsunamis would occur. The design, construction, placement and maintenance of any water retention, detention facilities would adhere to applicable city building code standards and/or previously referenced flood/erosion control requirements. Therefore, potential impacts associated with seiche or mudflows would be reduced to a less than significant level. No mitigation is required.

- b. See response X.a. above.
- c. See response X.a. above.
 - c.i) See response X.a. above.
 - c.ii) See response X.a. above.
 - c.iii-iv) See response X.a. above.
- d. See response X.a. above.

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- e. See response X.a. above.

XI. LAND USE AND PLANNING:

- a. **No Impact.** Adoption of the 2020-2029 Housing Element and the text amendment to the Community Development (Land Use) Element will not result in physical divisions to an established community. The 2020-2029 Housing Element provides policies and programs to ensure the provision of housing for all segments of the community throughout the City including actions to affectively further fair housing. The 2020-2029 Housing Element and Community Development Element amendment do not conflict with the City's HCP. The adoption of the 2020-2029 Housing Element and the Community Development Element text amendment reflecting the updated Housing Element will not conflict with the General Plan or any other policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The 1,319 units required by the RHNA are within the capacity of the City's General Plan and land use policies. All locations identified for housing developments are designated for residential development, which is consistent with the General Plan. All new development will be required to comply with General Plan land use policies and PMC regulations. The Housing Plan (Chapter 6) of the 2020-2029 Housing Element includes a monitoring program to ensure consistency with the General Plan. Therefore, no impacts would result from the project. No mitigation measures are required.
- b. See response XI.a. above.

XII. MINERAL RESOURCES:

- a. **No Impact.** The 2020-2029 Housing Element identifies adequate sites in areas already designated for residential and mixed-use use to meet the City's RHNA. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Community Development Element, to a base designation, or to any physical development standards. Though it proposes neither specific development projects nor changes in base zoning, the Housing Element Update identifies opportunity sites that are feasible for development. The 2020-2029 Housing Element could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated impacts have already been accounted for in association with the adopted General Plan or Specific Plan. In addition, any future development projects supported by the 2020-2029 Housing Element would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. The 2020-2029 Housing Element identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 29, 2029. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. Poway's only known valuable mineral resource, as recognized by the California Department of Conservation, Division of Mines and Geology, is construction quality sand and gravel located along the City's southern border within the South Poway Business Park which

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does not allow for or provide housing. Therefore, no impacts would result. No mitigation is required.

- b. See response XII.a. above.

XIII. NOISE:

- a. **Less Than Significant Impact.** The 2020-2029 Housing Element identifies adequate sites in areas already designated for residential and mixed-use use to meet the City's RHNA. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Community Development Element, to a base designation, or to any physical development standards. Though it proposes neither specific development projects nor changes in base zoning, the Housing Element Update identifies opportunity sites that are feasible for development. The 2020-2029 Housing Element could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated impacts have already been accounted for in association with the adopted General Plan or Specific Plan. In addition, any future development projects supported by the 2020-2029 Housing Element would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. The 2020-2029 Housing Element identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 29, 2029. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. Without specific details regarding each new housing development, it is not possible to determine potential noise impacts and specific mitigation measures. However, city codes have established noise level limits for residential development and noise mitigation measures are required as part of any new residential development. This includes the provision of noise attenuation walls for protection from traffic noise and compliance with building code requirements for interior noise levels. All future development for housing may be subject to site-specific environmental studies with regard to noise impacts and compliance with city codes and policies would be required.

New projects that propose housing for very low- and low-income households can be developed by-right, however, will be required to comply with General Plan policies and PMC requirements for noise compliance for residential developments. Adherence to applicable city regulations would reduce the potential impacts to below a level of significance. No mitigation is required.

- b. See response XIII.a. above.
- c. **No Impact.** See response XIII.a. above.
- d. **Less Than Significant Impact.** See response XIII.a. above.

XIV. POPULATION AND HOUSING:

- a. **Less Than Significant Impact.** The 2020-2029 Housing Element contains updated demographic and growth project information to allow the City to plan for its future housing needs as required by state law. The City of Poway was assigned a future housing need goal of 1,319 housing units for the 2020-2029 planning period by HCD and SANDAG. Poway must plan for units affordable to all income levels, specifically: 468 very low-income units, 268 low-income units, 241 moderate-income units and 342 above moderate-income units. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. The City is not required to build these housing units, but must show it has sites with adequate zoning and development standards that could accommodate the housing units during the 2020-2029 planning period. The updated Housing Element contains an inventory of sites that could accommodate the allocated need as required by state law.

Through the City's environmental review process for housing projects, the potential for growth inducing impacts would be evaluated. The 2020-2029 Housing Element identifies adequate sites in areas already designated for residential and mixed-use use to meet the City's RHNA. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Community Development Element, to a base designation, or to any physical development standards. Though it proposes neither specific development projects nor changes in base zoning, the Housing Element Update identifies opportunity sites that are feasible for development. The 2020-2029 Housing Element could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated impacts have already been accounted for in association with the adopted General Plan or Specific Plan. In addition, any future development projects supported by the 2020-2029 Housing Element would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. New projects that propose housing for very low- and low-income households can be developed by-right, however, will have to comply with all land use and housing policies and regulations identified in the General Plan and PMC.

Adoption of the 2020-2029 Housing Element and the Community Development Element amendment accommodates the development of housing in the City. The 2020-2029 Housing Element and associated amendments to the Community Development Element would result in a less than significant impact with regard to Population and Housing. No mitigation is required.

- b. See response XIV.a. above.

XV. PUBLIC SERVICES:

- a.i. Fire Protection – **Less Than Significant Impact.** The City of Poway provides fire and paramedic services along with managing a contract with the San Diego County Sheriff's Department for public safety protection services for the City of

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Poway. Public services are adequate to serve current and future population. Implementation of the 2020-2029 Housing Element is not expected to increase the demand for public services.

Development of additional housing as identified in the 2020-2029 Housing Element is consistent with the anticipated population growth in the Poway General Plan and could potentially increase the demand on schools. All new residential development is required to pay school impact fees to offset the cost of providing additional services. Park-in lieu fees or the provision for park land and improvements will be required with the development of any new housing development to offset any impacts to park services. Impacts to public services will be less than significant. No mitigation is required.

- a.ii. Police Protection – See response XV.a. above.
- a.iii. Schools – See response XV.a. above.
- a.iv. Parks – See response XV.a. above.
- a.v. Other Public Facilities – See response XV.a. above.

XVI. RECREATION:

- a. **Less Than Significant Impact.** The City currently has 17 parks, including two regional park facilities (Blue Sky Ecological Preserve and Lake Poway), 78 miles of trails and over 5,000 acres of dedicated open space. New development anticipated by the 2020-2029 Housing Element may increase the demand for parks and recreation facilities in the City. Projects would be required to pay park in-lieu impact fees or provide park land and improvements pursuant to City codes. The City has adequate park and recreation facilities to serve existing and future population. New projects that propose housing will be encouraged to include private park/recreation areas within individual developments. Impacts will be less than significant. No mitigation measures are required.
- b. See response XVI.a. above.

XVII. TRANSPORTATION:

- a. **No Impact.** The 2020-2029 Housing Element would not expand the area in which development is permitted under the General Plan or Zoning Ordinance. The 2020-2029 Housing Element identifies adequate sites in areas already designated for residential and mixed-use use to meet the City's RHNA. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Community Development Element, to a base designation, or to any physical development standards. Though it proposes neither specific development projects nor changes in base zoning, the Housing Element Update identifies opportunity sites that are feasible for development. The 2020-2029 Housing Element could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated impacts have already

been accounted for in association with the adopted General Plan or Specific Plan. In addition, any future development projects supported by the 2020-2029 Housing Element would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. Many new projects that propose housing for very low- and low-income households can be developed by-right, however, will have to comply with General Plan policies and Municipal Code requirements for any potential impacts to transportation and traffic. The 2020-2029 Housing Element identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 29, 2029. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. Any new housing units will generate increased levels of traffic and demand for parking. Most future housing development projects will be located in areas near transit, commercial and other community services – thereby reducing the demand for vehicle trips. New housing development proposed within the City shall comply with the density and intensity standards outlined in the General Plan, the City’s current Zoning Ordinance, and/or applicable specific plans and does not conflict with applicable General Plan or Specific Plan projections for housing which were previously certified in an EIR. Adherence to such requirements will reduce potential impacts associated with transportation to less than a significant level. No mitigation measures are required as a part of this project.

The Housing Element update would not increase hazards due to a design feature, result in inadequate emergency access, or conflict with adopted policies, plans, or programs supporting alternative transportation.

- b. See response XVII.a. above.
- c. **Less Than Significant Impact.** See response XVII.a. above.
- d. See response XVII.a. above.

XVIII. TRIBAL CULTURAL RESOURCES:

- a.i) **Less Than Significant Impact.** According to State CEQA Guidelines (Section 15064.5) and Public Resources Code (Sections 21083.1 and 21083.2), the proposed project would be considered to have a significant impact if it would cause a substantial adverse change to a unique archeological resource.

Assembly Bill 52 (AB 52, Gatto. Native Americans: California Environmental Quality Act) and CEQA Public Resources Code Section 21080.31, subdivisions (b), (d)), requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project.

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill (SB) 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan, or to designate open space that includes Native American Cultural Places. The tribal organizations eligible to consult have traditional lands in a local government’s jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the

California Office of Planning and Research's Tribal Consultation Guidelines (2005), "the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to cultural places."

In accordance with Government Codes Sections 65352.3 and 65342.4 and Public Resources Code Section 21080.3.1, the City of Poway, as Lead Agency, sent a letter to the Tribal Representatives notifying the tribes identified by the Native American Heritage Commission (NAHC) of the proposed project in accordance with AB 52 and SB 18. The City received responses from the Rincon Band of Luiseño Indians tribe, which noted they are not traditionally and culturally affiliated within the geographic area within the City of Poway's jurisdiction. Responses to the AB 52 and SB 18 consultation notices were received and consultation concluded. Future housing projects will require AB 52 and SB 18 consultation and sacred lands file searches as applicable.

The 2020-2029 Housing Element identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 29, 2029. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. To ensure significant impacts to cultural resources do not occur, future development of residential units will be in accordance with applicable city, state, and federal standards and guidelines including General Plan policies and PMC regulations. The City has adopted a list of Historical Sites List which is implemented through the City's Historical Structure Ordinance (PMC Chapter 17.45). The City's General Plan also includes a Prehistoric and Historic Resources Element, which identifies archaeologically sensitive areas within the City. If a site identified in the Residential Sites Inventory has a high or moderate probability of containing historically sensitive areas, an archaeological report may be required. Any recommended mitigation measures would be made conditions of any project approval. Adherence to such requirements will reduce potential impacts associated with cultural resources to less than a significant level. No mitigation measures are required.

a.ii) See response XVIII.a.i. above.

XIX. UTILITIES AND SERVICE SYSTEMS:

- a. **Less Than Significant Impact.** The 2020-2029 Housing Element identifies adequate sites in areas already designated for residential and mixed-use use to meet the City's RHNA. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Community Development Element, to a base designation, or to any physical development standards. Though it proposes neither specific development projects nor changes in base zoning, the Housing Element Update identifies opportunity sites that are feasible for development. The 2020-2029 Housing Element could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated impacts have already been accounted for in

association with the adopted General Plan or Specific Plan. In addition, any future development projects supported by the 2020-2029 Housing Element would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. The 2020-2029 Housing Element update identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 15, 2029. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. Future wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facility needs will be evaluated on an ongoing basis with each new development that is proposed. Recommendations for improvements and/or new facilities will be made at that time. Adherence to all applicable standards and policies of the city, state, and federal governments, including Regional Water Quality Control Board requirements and applicable management and reduction statutes, would be required. Demand for sufficient water supplies and solid waste will also be evaluated. The volume of potable water demand and solid waste generated by the anticipated housing units is not anticipated to adversely water supply or impact landfills or other solid waste disposal facilities. New projects that propose housing for very low- and low-income households can be developed by-right, however, will have to comply with General Plan policies and PMC requirements to address any potential increase in facility needs and demand. Adherence to applicable city policies and regulations would be required at that time and would reduce the potential impacts to below a level of significance. No mitigation is required.

- b. See response XIX.a. above.
- c. See response XIX.a. above.
- d. See response XIX.a. above.
- e. See response XIX.a. above.

XX. WILDFIRE:

- a. **Less Than Significant Impact.** Any geographic area mapped by the State or designated by a local jurisdiction as a moderate, high, or very high fire hazard area or which the Fire Authority Having Jurisdiction (FAHJ) has determined is a hazardous fire area, because the type and condition of vegetation, topography, weather and structure density increase the probability that the area will be susceptible to a wildfire. According to the Very High Fire Hazard Severity Zones (VHFHSZ) map for Poway (CAL FIRE 2009), the majority of Poway is located within the VHFHSZ. Fire Prevention staff applies additional code requirements and fuel modification requirements to new construction projects in these areas. Vegetation management programs applies to existing parcels in these areas and is managed by Code Compliance in consultation with the staff from the Fire Prevention Division. The Fire Protection Plan (FPP) is a document may be required for projects within a VHFHSZ and prepared for a specific project or development proposed in the wildland-urban interface fire area that describes ways to minimize and mitigate potential loss from wildfire exposure, with the purpose of reducing impact on the community's fire protection delivery system.

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The City of Poway adopts by reference the International Fire Code and the California Fire Code. Local amendments are included in the triennial adoption process that addresses Poway's unique climatic, geologic, and topographic characteristics. This adoption creates Poway's Fire Code within the Poway Municipal Code.

The 2020-2029 Housing Element identifies adequate sites in areas already designated for residential and mixed-use use to meet the City's RHNA. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Community Development Element, to a base designation, or to any physical development standards. Though it proposes neither specific development projects nor changes in base zoning, the 2020-2029 Housing Element identifies opportunity sites that are feasible for development. The 2020-2029 Housing Element could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated impacts have already been accounted for in association with the adopted General Plan or Specific Plan. In addition, any future development projects supported by the 2020-2029 Housing Element would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. The 2020-2029 Housing Element update identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 15, 2029. Of that total, 519 housing units were under construction or entitled as of December 2020, leaving a remaining need of 800 housing units. The project does not substantially impair an adopted emergency response plan or emergency evacuation plan. The project does not exacerbate wildfire risks, nor expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The project does not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The project does not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. New projects that propose housing for very low- and low-income households can be developed by-right, however, will have to comply with General Plan policies and PMC requirements to address any potential wildfire risks. Adherence to applicable city policies and regulations would be required at that time and would reduce the potential impacts to below a level of significance. No mitigation is required.

- b. See response XX.a. above.
- c. See response XX.a. above.
- d. See response XX.a. above.

XXI. MANDATORY FINDING OF SIGNIFICANCE:

Less than Significant Impact. Development of additional housing units in the City has the potential to increase the amount of traffic on local roadways, generate emission of pollutants and particulate matter, generate noise within the project limits, affect the amount and distribution of biological resources and affect the provision of public services. The 2020-2029 Housing Element identifies adequate sites in areas already designated for residential and mixed-use use to meet the City's RHNA. The project will not result in the approval of any physical improvements and does not propose any changes to the General Plan Community Development Element, to a base designation, or to any physical development standards. Though it proposes neither specific development projects nor changes in base zoning, the 2020-2029 Housing Element identifies opportunity sites that are feasible for development. The 2020-2029 Housing Element could indirectly result in residential development and improvement, the development would occur in residential and mixed-use areas of the City already designated in the General Plan for housing. Therefore, development within these sites and their associated impacts have already been accounted for in association with the adopted General Plan or Specific Plan. In addition, any future development projects supported by the 2020-2029 Housing Element would be evaluated at the project proposal stage and subject to the state, regional, and local plans, and the policies therein. The 2020-2029 Housing Element update identifies an assigned growth need of 1,319 housing units for development from June 30, 2020 through April 29, 2029. Although the Housing Element update identifies an assigned growth need of 1,319 housing units by 2029, all units would not necessarily be constructed. New projects that propose housing for very low- and low-income households can be developed by-right, however, will have to comply with General Plan policies and PMC requirements. To ensure that significant impacts to sensitive biological or historical resources do not occur, future development of residential units will be in accordance with the Poway Subarea Habitat Conservation Plan, the General Plan, the PMC and any other requirements. Adherence to other applicable city policies and regulations would be required at that time and would reduce the potential impacts to below a level of significance. No mitigation is required

- a. See response XXI.a. above.
- b. See response XXI.a. above.

Attachment(s):

Exhibit A
Project Location Map

