

DRAFT INITIAL STUDY/ENVIRONMENTAL
CHECKLIST FORM FOR THE
CITY OF EL CAJON GENERAL PLAN AMENDMENT:
HOUSING ELEMENT UPDATE (SIXTH CYCLE: 2021-2029), SAFETY
ELEMENT UPDATE, AND ENVIRONMENTAL JUSTICE ELEMENT

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ADU	Accessory Dwelling Unit
AMI	Area Median Income
BMP	Best Management Practice
CBC	California Building Code
CDBG	Community Development Block Grant
CEQA	California Environmental Quality Act
City	City of El Cajon
EIR	Environmental Impact Report
FAR	Floor Area Ratio
GHG	Greenhouse Gas
GPA	General Plan Amendment
HACSD	Housing Authority County of San Diego
HCD	Housing and Community Development
VHFHSZ	Very High Fire Hazard Severity Zone
IS	Initial Study
M-U	Mixed-Use Overlay Zone
ND	Negative Declaration
NPDES	National Pollution Discharge Elimination System
RHNA	Regional Housing Needs Assessment
SANDAG	San Diego Association of Governments
SB 1000	Senate Bill 1000
SDAB	San Diego Air Basin
SDRAFFH	San Diego Regional Alliance for Fair Housing
SWPPP	Stormwater Pollution Prevention Plans
TDSP	Transit District Specific Plan

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1 Introduction

1.1 Project Overview

The project proposes an amendment to the General Plan of the City of El Cajon (City). The City's General Plan serves as a "blueprint" for how the City of El Cajon will grow and develop and underwent an update in 2001 and is comprised of the following elements: 1) Annexation; 2) Circulation; 3) Conservation; 4) Historic Preservation; 5) Housing; 6) Land Use; 7) Noise; 8) Open Space and Parks; 9) Safety; 10) Hazardous Waste Management; and 11) Solid Waste Management. The proposed General Plan Amendment (GPA or Project) would include updates to the Housing Element and Safety Element, and the establishment of a new state-mandated Environmental Justice Element.

1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA), a statewide environmental law described in California Public Resources Code, sections 21000–21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an environmental impact report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

The City's Community Development Department directed and supervised the preparation of this Initial Study (IS)/Negative Declaration (ND). Although prepared with assistance from the consulting firm Dudek, the content contained within and the conclusions drawn by this IS/MND reflect the independent judgment of the City.

1.3 Initial Study Checklist Overview

Dudek, under the City's guidance, prepared the Project's Environmental Checklist (i.e., IS) in accordance with CEQA Guidelines sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is found in Section 3 of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination made in the checklist for the Project.

For this IS/ND, the following four possible responses to each individual environmental issue area are included in the checklist:

1. Potentially Significant Impact
2. Less-than-Significant Impact with Mitigation Incorporated
3. Less-than-Significant Impact
4. No Impact

The checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project. In doing so, the City will determine the extent of additional environmental review, if any, for the Project.

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2 Project Description

The Project proposes an amendment to the City's General Plan. The City's General Plan serves as a "blueprint" for how the City of El Cajon will grow and develop and underwent an update in 2001 and is comprised of the following elements: 1) Annexation; 2) Circulation; 3) Conservation; 4) Historic Preservation; 5) Housing; 6) Land Use; 7) Noise; 8) Open Space and Parks; 9) Safety; 10) Hazardous Waste Management; and 11) Solid Waste Management. The proposed General Plan Amendment (GPA) includes updates to the Housing Element and Safety Element, and the establishment of a new state-mandated Environmental Justice Element.

2.1 Housing Element Update

Background

Since 1969, California has required all local governments to adequately plan to meet the housing needs of everyone in the community. California's local governments meet this requirement by adopting housing plans as part of their "general plan." The law mandating that housing be included as an element of each jurisdiction's general plan is known as "housing-element law."

The proposed 2021-2029 Housing Element represents the City of El Cajon's effort in fulfilling the requirements under State Housing Element law. The California State Legislature has identified the attainment of a decent home and suitable living environment for every Californian as the State's major housing goal. Recognizing the important role of local planning and housing programs in the pursuit of this goal the Legislature has mandated that all cities and counties prepare a housing element as part of the comprehensive General Plan.

Pursuant to State law, the Housing Element must be updated periodically according to statutory deadlines. The proposed Sixth Cycle Housing Element covers the planning period of April 15, 2021 to April 15, 2029.

State Law requires that the Element include the following components:

- An analysis of the City's population, household, and employment base, and the characteristics of the housing stock;
- A summary of the present and projected housing needs of the City's households;
- A review of potential constraints to meeting the City's identified housing needs;
- An evaluation of opportunities that will further the development of new housing; and
- A statement of the Housing Plan to address the identified housing needs.

The Housing Element is being updated at this time in conformance with the 2021-2029 update cycle for jurisdictions in the San Diego Association of Governments (SANDAG) region. The Housing Element builds upon the other General Plan elements and is consistent with the policies set forth by the General Plan, as amended. As portions of the General Plan are amended in the future, the Plan (including the Housing Element) will be reviewed to ensure that internal consistency is maintained.

The City also recognizes that recent changes to State laws require the updating of various elements of the General Plan, upon update of the Housing Element, to address the following issues:

- Required amendment to address flood hazards and flood management, fire hazards, sea level rises, and other climate change- related issues; and
- Incorporation of an Environmental Justice Element.

This 2021-2029 Housing Element update is coordinated with updates to these other elements of the General Plan to ensure consistency in policy frameworks, and efficient and comprehensive outreach efforts.

Regional Housing Needs Assessment (RHNA)

HCD is required to prepare a Regional Housing Needs Assessment (RHNA) for each Council of Governments in the state that identifies projected housing units needed for all economic segments based on Department of Finance population estimates. The San Diego Association of Governments (SANDAG) is the Council of Governments for the San Diego region and allocates to the 18 cities and the unincorporated area of San Diego County their fair share of the total RHNA housing needed for each income category. Each local government must demonstrate that it has planned to accommodate all of its regional housing need allocation in its Housing Element. The City's allocation of its share of RHNA housing is 3,280 units for the 2021–2029 Housing Element. The City has met a portion of its RHNA allocation, with 2,963 units remaining to be filled as follows: 894 very low/low income units; 372 moderate income units; and 1,697 above moderate-income units. To accommodate the remaining allocation of 2,963 units City staff identified Mixed-Use Overlay Zone (M-U) sites, Transit District Specific Plan (TDSP) sites and other vacant/underutilized land sites for the 2021-2029 Housing Element Update. These identified sites will not only accommodate the remaining RHNA allocation of 2,963 units but, at buildout, an additional 1,521 units will be accommodated as a buffer. A total of 4,484 additional units have been identified in the sites inventory, with a majority of these units being located on high-density residential or mixed-use sites.

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 regional growth. The development of the sites inventory started with the vacant and non-vacant sites that were identified by the City based on staff knowledge of existing conditions and development interests expressed by property owners and developers. Then a series of GIS analyses were conducted to identify additional vacant and non-vacant sites in the City within the TDSP or M-U areas, using data from SANDAG, the County Assessor's Office, and criteria which demonstrate feasibility for redevelopment.

Vacant and non-vacant properties in the areas were identified using the following steps and criteria:

- Improvement-to-land value ratio less than 1.0, indicating the improvements on site are worth less than the land and therefore, conducive to recycling to higher intensity uses. Properties that appear to house viable uses or with new construction are removed from the potential sites inventory.
- Underutilized sites are those that can accommodate a higher floor to area ratio as compared to similar sites. Within the TDSP, sites with more than the average 0.45 FAR (Floor Area Ratio) of all parcels in the TDSP, and sites with more than the average 0.60 FAR in the M-U zone, were removed. Any property that did not come below the respective average was removed from the list.
- Sites with buildings or structures on the land that were less than 40 years old were also removed from the list.
- Apartments and condominium structures are automatically removed from the list.
- Additional parcels were added or removed based on staff recommendations.

City staff then reviewed the inventory of vacant and underutilized sites and proposed a series of land use policy changes to facilitate a range of housing options to accommodate the City’s RHNA allocation.

RHNA Approach

City staff reviewed the inventory of vacant and underutilized sites and identified M-U sites, TDSP sites, and other vacant/underutilized land sites that can accommodate the current RHNA allocation for the 2021-2029 Housing Element Update. Within the identified sites, the remaining RHNA of 2,963 units will be accommodated and at buildout can accommodate an additional 1,521 units for a total capacity of 4,484 units, with a majority of these units being accommodated on high-density residential or mixed-use sites.

There are 93 sites identified in the M-U zone as being vacant or underutilized using the methodology described above. Each of the sites identified in the M-U zone has an allowable maximum density of 40 units per acre. There are 30 sites that meet the size requirement to be feasible for low income housing units (greater than half an acre and less than 10 acres). A total of 48 acres throughout the M-U zone are feasible for low income. Considering the existing units already present on the sites and assuming development at 80 percent of the allowable density, a development potential of 1,515 units can be used to accommodate the lower income RHNA. The remaining sites in the M-U zone will be used to accommodate above moderate income, with a net potential of 2,099 units.

Within the TSDP there are 77 sites, across approximately 25 acres, which are either vacant or underutilized according to the sites selection methodology. In the TDSP, there are 5.54 acres in the C-G zoning that allow densities from 30 to 40 units per acre and are feasible for lower income and account for 130 net potential units. There are also sites zoned RM-HR that immediately surround the transit station that allow for up to 60 units per acre in the TDSP. These sites account for a net potential of 146 low income units. The other remaining sites within the TDSP are not feasible for lower income but account for 195 moderate income units and 111 above moderate-income units.

Outside of the City’s Downtown most of the City’s vacant and underutilized residential sites are zoned for low to medium density residential uses. Based on the allowable density and net potential, the 51 vacant and underutilized residential sites in the City can accommodate 288 units. Specifically, 106 units can be accommodated on low density residential sites, affordable primarily to above moderate-income households. Another 182 units can be accommodated on medium density residential sites that are considered feasible to facilitate moderate income housing.

Table 1 summarizes the City’s accommodation of the RHNA units for all income groups during the planning period. After accounting for development credits and the realistic capacity of sites identified by staff and analyses, the City has identified adequate capacity for its RHNA requirement for the planning period and no up zoning or rezoning is required.

Table 1. Adequacy of Sites Inventory

	Very Low/Low Income	Moderate Income	Above Moderate Income	Total
RHNA	895	518	1,867	3,280
Credits	1	146	170	411
Remaining RHNA	894	372	1,697	2,963
Sites Inventory Capacity				
M-U Zone Sites	1,515	0	2,099	3,614
TDSP Sites	276	195	111	582
Other Vacant and Underutilized	0	182	106	288
Subtotal	1,791	377	2,316	4,484
Surplus	+897	+5	+619	+1,521

Source: City of El Cajon 2021-2029 Housing Element

Housing Plan

As required by State Housing Element law, the Housing Element Update includes a Housing Plan to facilitate and encourage the provision of housing consistent with the RHNA allocation. The goals, objectives, policies, and implementing programs of the Housing Plan emphasize: methods of encouraging and assisting in the development of new housing for all income levels; removing government constraints, where feasible and legally possible; conserving and improving existing housing; providing increased opportunities for home ownership; reducing impediments to fair housing choice; and monitoring and preserving units at risk of converting from affordable to market rate. The Housing Plan also includes numerous policies to better guide decisions and achieve desired outcomes related to the development, improvement, preservation, and maintenance of housing.

The following is a summary of the key programs that would be included in the City’s proposed Housing Element Update. Many of these are a continuation of programs from the previous 2013–2021 Housing Element.

Program 1: Adequate Sites for Meeting RHNA and Monitoring No Net Loss

As described above, under the RHNA Approach, the City has identified adequate sites to accommodate the remaining RHNA allocation. Additionally, the City would monitor the consumption of residential acreage to ensure an adequate inventory is available to meet the City’s RHNA obligations. The City would implement the formal ongoing (project-by-project) evaluation procedure pursuant to Government Code section 65863. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City would identify and if necessary rezone sufficient sites to accommodate the shortfall and ensure “no net loss” in capacity to accommodate the RHNA.

Program 2: By-Right Approval of Projects with 20 Percent Affordable Units on “Reuse” Housing Element Sites

Pursuant to AB 1397 passed in 2017, the City will amend the Zoning Code to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower income households, on sites being used to meet the 6th cycle RHNA that represent “reuse sites” previously identified in the 4th and 5th cycles Housing Element. The “reuse” sites are specifically identified in the inventory (see Appendix C).

Program 3: Replacement Housing

In order to ensure that any affordable housing demolished as the result of the development of a non-vacant site is replaced, a program to require the replacement of affordable units will require an amendment of the Zoning Code.

Program 4: Accessory Dwelling Units (ADUs)

The California State legislature has been promoting the development of ADUs and Junior Accessory Dwelling Units (JADU) as one solution to increase the supply of affordable housing. In recent years, State laws regarding them have been amended many times to reduce barriers to their development. The City allows ADUs and JADUs as a permitted use in all residential zones and regulates them pursuant to section 17.140.180 of the El Cajon Zoning Code. Although El Cajon updated the Zoning Code in 2019 to include amendments to State law, additional bills that became effective in 2020 have caused the City’s ADU/JDU ordinance to be inconsistent with certain provisions in State law. The City is in the process of updating the Zoning Code to comply with the requirements of State law regarding ADUs and JADUs. The City may consider referencing the State regulations so that it will remain consistent if/when the State regulations are revised. In addition, AB 671 (Friedman), which became effective January 1, 2020, requires that local jurisdictions develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rents for very-low, low- or moderate-income households. The City will develop a plan to comply with this requirement.

Program 5: Affordable Housing Development

The City continues to have extensive needs for affordable housing for lower income households, especially for seniors, disabled, the homeless, and those at imminent risk of becoming homeless. The City will continue to work with housing developers to expand affordable housing opportunities in the community.

Program 6: Housing Rehabilitation Loan Program

Loans are available to rehabilitate/repair single-family detached units and mobile-homes (in eligible parks) in the City of El Cajon for families earning 80 percent or less of the Area Median Income (AMI). Funding priority is given to health and safety repairs, energy efficiency improvements, lead-based paint abatement, and ADA accommodations. Loans are fully deferred with zero interest and up to \$50,000 for single-family units and \$20,000 on mobile-homes, which becomes due and payable upon sale, rental, refinance, transfer of the property or when the owner(s) no longer occupy the home as their primary residence. Costs for lead abatement may increase the loan amount beyond the approved amount. In addition to income restrictions, maximum property value restrictions apply. The homeowner, among other requirements, must have owned the property for at least one year and have adequate equity in the home.

Program 7: Acquisition/Rehabilitation Program

The El Cajon Housing Authority may assist in the acquisition or rehabilitation of existing multifamily housing and set aside of number of the housing units for lower-income households and/or special needs households at affordable rents for not less than 55-years.

Program 8: Crime-Free Multi-Housing

El Cajon’s Crime-Free Multi-Housing program consists of three phases: Phase 1 is an eight-hour seminar for owners, property managers, and property staff; Phase 2 is the Safety Inspection; and Phase 3 is the Safety Social, a gathering of residents to share information about living in at a Crime-Free property. An apartment complex, mobile home or hotel/motel that completes the program is certified as a Crime-Free property for one year. This program is a recognized program in which tenants in search of housing seek out Crime-Free properties. Certified properties

are allowed to use the Crime-Free program logo in advertising the properties and the Police Department keeps a list of certified Crime-Free properties.

Program 9: Proactive Multi-family Inspection Program

The City’s proactive multi-family inspection program conducts routine inspections of multifamily properties with three or more units. The inspection program ensures that property owners and managers maintain minimum housing standards for the safety of residents and overall routine property maintenance. This ensures the livability and safety of apartments and the surrounding neighborhoods. A proactive inspection program alleviates the burden on tenants to initiate code compliance cases to address habitability concerns. The program is on pause due to the COVID-19 pandemic but will resume once it is safe to do so.

Program 10: Housing Choice Vouchers

The Housing Authority of the County of San Diego (HACSD) administers the Housing Choice Voucher Program (Section 8) on behalf of most of the cities in the region, including the City. This program provides rent subsidy payments for very low income households in privately owned rental housing units. Approximately 2,600 households are assisted annually with Housing Choice Vouchers in El Cajon.

Program 11: Preservation of Assisted Housing at Risk of Converting to Market Rate

In order to meet the housing needs of persons of all economic groups in El Cajon, the City must guard against the loss of housing units available to lower income households. A total of 481 assisted units in seven HUD-insured projects are at risk of conversion to market rate prior to April 15, 2031. The City's objective is to either retain or replace as low-income housing all "at risk" units in the City.

Program 12: Homeless Services

The City provides in-kind and financial assistance to local service providers for emergency shelters and transitional housing facilities, as well as supportive services, which serve the City’s homeless population and those at risk of homelessness, as part of the City’s commitment to the continuum of care approach to ending homelessness. Specifically, the City prioritizes its funding to assist those who have recently become homeless and those who are at risk of becoming homeless due to economic circumstances.

Program 13: First Time Homebuyer Assistance

The City of El Cajon offers assistance to eligible first time homebuyers to purchase a new or existing single-family or condominium unit in the City. The program utilizes a combination of HOME, CalHome and/or other resources as they become available. Funds are available on a first-come, first-serve basis.

Program 14: Zoning Code Amendments

State law requires that Housing Elements address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing. The City will also continue to monitor federal and State legislation that could impact housing and comment on, support, or oppose proposed changes or additions to existing legislation, as well as support new legislation when appropriate. The 2021-2029 Housing Element update identified certain governmental constraints to the development or maintenance of housing in El Cajon, and the City will continue to monitor its development process and zoning regulations to identify and remove constraints to the development of housing. Detailed discussions about these housing options are provided in the Housing Constraints section of the Housing Element.

Program 15: Fair Housing Services and Resources

The City of El Cajon utilizes the service of a nonprofit fair housing service provider to provide a variety of fair housing and tenant/landlord services. Currently, the City contracts with the CSA San Diego County (CSA). The fair housing contract is reviewed annually through the annual CDBG funding allocation process. As part of its contract with the City, the fair housing service provider will:

- Serve as a fair housing resource for the area, including implementation of an affirmative fair housing marketing plan, testing and complaint verification;
- Respond to all citizen complaints regarding violations of the fair housing laws;
- Provide tenant-landlord counseling to all inquiring citizens;
- Promote community awareness of fair housing rights and responsibilities;
- Monitor fair housing legislation, attend training and reports to the City; and
- Maintain a rental listing service of affordable and accessible housing within the City of El Cajon.

The City participated in a regional assessment of impediments to fair housing choice in 2020. The City will continue to participate in the San Diego Regional Alliance for Fair Housing (SDRAFFH) and take actions to address fair housing impediments. The City attends quarterly SDRAFFH meetings with the other 17 cities, the County, and fair housing service providers, to address fair housing issues. The City distributes information on fair housing and refers fair housing questions and housing discrimination claims to its fair housing service provider, CSA.

The City will continue to provide the public with information regarding basic and specialized assistance programs provided by or located in the El Cajon, including: emergency food, shelter, services for homeless, senior programs/projects, fair housing and tenant landlord contacts, Section 8 contacts, foreclosure prevention, affordable housing opportunities, and loan servicing information for current borrowers. Such information will be made through various mediums, including printed materials available at City Hall, through the City's website, its quarterly Newsletter, other media outlets, and with direct staff contact.

The proposed Housing Element Update is available at: <https://www.cityofelcajon.us/Plan>

2.2 Safety Element Update

A Safety Element was part of the City of El Cajon General Plan 2000 adopted by City Council Resolution No. 10-91 on January 8, 1991 and amended by City Council Resolution No. 31-98 on February 10, 1998. The proposed Safety Element Update incorporates recently adopted State laws that require the following to be performed, updated, and included in a Safety Element:

- a) Identify and update information related to:
- Seismic and geologic hazards;
 - Evacuation routes;
 - Military installations;
 - Peak-load water supply requirements;
 - Minimum road widths and clearances around structures;
 - Flood hazards; and
 - Fire hazards.

- b) Prepare a climate change vulnerability assessment and develop climate adaptation and resilience strategies.
- c) Identify residential developments in any hazard area that does not have at least two evacuation routes.

In accordance with State law (Government Code section 65302), the City has prepared an update to its Safety Element. The proposed Safety Element Update organizes safety goals and policies into eight sections: 1) Air Pollution; 2) Extreme Heat; 3) Flooding; 4) Geologic Hazards; 5) Earthquakes and Seismic Hazards; 6) Liquefaction; 7) Hazardous Materials; and 8) Wildfires. The plan provides six goals, which provide policies and actions that the City will implement as part of its General Plan and are as follows:

- 1) Protect the health of community members by improving air quality.
- 2) Promote a built environment that stays cool.
- 3) Minimize risks, such as loss of life, injury, property damage, and natural resource destruction, from natural hazards.
- 4) Maintain adequate emergency preparedness and response capabilities.
- 5) Design emergency response to serve a range of community needs.
- 6) Promote a community safe from human-caused hazards.

The proposed Safety Element Update is available at: <https://www.cityofelcajon.us/Plan>

2.3 Environmental Justice Element

The City is developing a new state-mandated Environmental Justice Element to be part of the City's General Plan and reflect the City's efforts in addressing Environmental Justice. The State of California defines Environmental Justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” (California Government Code § 65040.12.e.) In 2016, the State of California passed Senate Bill 1000 (SB 1000) requiring cities and counties to address Environmental Justice in their general plans. The City has prepared a standalone Environmental Justice Element rather than integrating Environmental Justice policies among existing General Plan elements. As provided by State Government Code section 65302(h), the Environmental Justice Element has the same weight as the mandatory elements of the General Plan and is internally consistent with the other elements.

The purpose of the Environmental Justice Element is to address public health risks and environmental justice concerns of those living in disadvantaged communities as defined in Gov. Code, section 65302, subd. (h)(4)(A), many of which are the result of geographic or procedural inequities. Consistent with requirements of SB 1000, the Environmental Justice Element contains goals and policies that identify:

- 1) Disadvantaged communities, also known as Environmental Justice Communities (EJCs), within the City's General Plan planning area.
- 2) Objectives and policies to:
 - a. Reduce unique or compounded health risks in Environmental Justice Communities through assessing conditions in Environmental Justice Topic Areas that include but are not limited to:
 - i. Reducing pollution exposure and improving air quality;

- ii. Promoting public facilities, defined as public improvements, public services, and community amenities;
 - iii. Promoting food access;
 - iv. Promoting safe and sanitary homes; and
 - v. Promoting physical activity.
- b. Promote civil engagement in public decision making.
- c. Prioritize improvements and programs to address the needs of Environmental Justice Communities.

The proposed Environmental Justice Element organizes goals and policies into the following sections: Pollution; Air Quality; Promoting Access to Public Facilities; Promoting Access to Healthy Food; Promoting Access to Safe and Sanitary Homes; Promoting Access to Physical Activity; Promoting Civic Engagement; and Prioritizing Improvements and Programs for Environmental Justice Communities. The plan provides seven goals, which provide policies and actions that the City will implement as part of its General Plan and are as follows:

- 1) Promote efforts to improve the quality of the built and natural environments to reduce disparate health and environmental impacts.
- 2) Ensure that public facilities and services are equitably located and distributed throughout EJs, allowing easy access for residents.
- 3) Ensure access to healthy food.
- 4) Ensure safe and sanitary housing for EJC residents.
- 5) Provide and improve parks and recreation centers that serve all ages and abilities in the EJs.
- 6) Promote and ensure meaningful and effective participation and community capacity building in EJs, especially when developing, adopting, implementing, and enforcing plans and policies related to public health and environmental issues or any plans or programs that affect the EJs.
- 7) Prioritize improvements and programs that address the needs of residents in the EJs.

The proposed Environmental Justice Element to the City's General Plan is available at:

<https://www.cityofelcajon.us/Plan>

3 Initial Study Checklist

1. Project title:

City of El Cajon General Plan Amendment: Housing Element Update, Safety Element Update, and Environmental Justice Element

2. Lead agency name and address:

City of El Cajon, Community Development Department
200 Civic Center Way, 3rd Floor
El Cajon, CA 92020

3. Contact person and phone number:

Melissa Devine: 619.441.1773

4. Project location:

Citywide

5. Project applicant's name and address:

City of El Cajon, Community Development Department
200 Civic Center Way, 3rd Floor
El Cajon, CA 92020

6. General plan designation:

N/A for adoption of Housing Element Update, Safety Element Update and Environmental Justice Element

7. Zoning:

N/A for adoption of Housing Element Update, Safety Element Update and Environmental Justice Element

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

Proposed General Plan Amendment (GPA) to amend the City of El Cajon General Plan with updates to the Housing Element for the planning period of 2021 through 2029, Safety Element, and Environmental Justice Element.

9. Surrounding land uses and setting (Briefly describe the project’s surroundings):

The City of El Cajon is located at the southwestern portion of San Diego County, adjacent to the cities of Santee to the north, La Mesa and San Diego to the west, and unincorporated communities to the south and east. Citywide land uses include residential, commercial, public/semi-public, and industrial.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

The Housing Element Update will require approval from California Department of Housing and Community Development (HCD). The Safety Element requires review from the California Department of Forestry and review and consultation with the California Department of Conservation: Geological Survey.

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.?

Two tribes have requested notification pursuant to AB 52. The Mesa Grande Band of Mission Indians and the Jamul Indian Village tribes were notified and invited to consult via mail on April 12, 2021. No responses were received.

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “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.
- 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

June 10, 2021

Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - d. The significance criteria or threshold, if any, used to evaluate each question; and
 - e. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

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

Explanation of Checklist Judgements:

a–d: Less Than Significant Impact.

The Housing Element Update, Safety Element Update and Environmental Justice Element are policy documents and adoption of these Elements alone would not produce environmental impacts. The Housing Element Update consists of an updated housing program; for which, no actual development or rezoning is proposed as part of the update. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's 2021-2029 RHNA allocation, which specifies a need for the construction of 3,280 housing units. The City has met a portion of its RHNA, with a remaining RHNA of 2,963 housing units that need to be accommodated for the current cycle. To accommodate this RHNA allocation, City staff reviewed the inventory of vacant and underutilized sites and identified Mixed-Use Overlay Zone (M-U) sites, Transit District Specific Plan (TDSP) sites and other vacant/underutilized land sites that can accommodate the current RHNA allocation for the 2021-2029 Housing Element Update. Within the identified sites, the remaining RHNA of 2,963 units will be accommodated and an additional 1,521 units for a total capacity of 4,484 additional units, with a majority of these units being accommodated on high-density residential or mixed-use sites. Because El Cajon lacks a substantial amount of vacant land, any residential projects completed during this period are expected to be located on infill sites within existing urbanized areas. This type of development is more likely to improve rather than degrade the aesthetics of a neighborhood. Furthermore, any such development would be expected to conform to existing General Plan policies, municipal code, and zoning code development standards.

The Safety Element is a policy document that establishes the City’s goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does not propose any policies or actions that would result in impacts to aesthetic resources. The policies related to Goal 2 of the Safety Element would increase the City’s tree canopy and would likely improve rather than degrade the aesthetics of a neighborhood.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts to aesthetic resources. The policies and actions related to Goal 1 would increase the City’s tree canopy and would likely improve rather than degrade the aesthetics of a neighborhood.

In summary, the Housing, Safety and Environmental Justice Elements do not propose actual development or construction, nor do they provide any design guidelines for structures. The proposed element updates will not change or affect the way projects are designed. They will not provide any goals, policies, or programs that would significantly degrade the scenic quality of the City. Existing development standards and design guidelines will remain in place after certification of the Housing, Safety, and Environmental Justice Elements. Therefore, there would be no impact relative to aesthetics.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation of Checklist Judgements:

a–e: No Impact.

The Housing Element Update is a policy document, consisting of a housing program, and its adoption would not, in itself, produce environmental impacts, because no actual development or rezoning is proposed as part of the update. Although implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation, such development would not impact agricultural resources. There is no land within the City that is designated 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). Thus there would be no impacts to important farmland from implementation of the Housing Element Update. The Housing Element Update does not change any boundaries or the potential for agricultural activities. There are also no programs that would conflict with existing agricultural zoning or a Williamson Act contract. In addition, because the City does not contain forest land, there is no rezoning or development proposed on forest land, or land or timber property zoned as Timberland Production. Furthermore, because the City of El Cajon lacks a substantial amount of vacant land, any residential projects completed to meet the RHNA allocation are expected to be located on infill sites within urbanized areas not currently used for agricultural purposes nor zoned to allow future agricultural operations.

The Safety Element is a policy document that establishes the City’s goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does not propose any policies or actions that would result in impacts to agricultural and forestry resources, as there is no land within the City that is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the San Diego County Important Farmland map.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts to agricultural and forestry resources, as there is no land within the City that is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the San Diego County Important Farmland map.

Based on the above, the Housing Element Update, Safety Element Update and Environmental Justice Element would have no impact on agricultural and forestry resources.

3.3 Air Quality

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

Explanation of Checklist Judgements:

a–c: Less Than Significant Impact. d: No Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. The City lies within the San Diego Air Basin (SDAB). The San Diego Air Pollution Control District is the regional government agency that monitors and regulates air pollution within the SDAB and is responsible for measuring the air quality of the region. The SDAB is classified as a federal nonattainment area for ozone and a state nonattainment area for ozone, PM10 and PM2.5.

The Housing Element Update would not conflict with or obstruct implementation of the State Implementation Plan and the San Diego Air Pollution Control District’s Regional Air Quality Strategy, because the growth anticipated in the Housing Element Update (RHNA allocation) is consistent with SANDAG’s Series 13 growth projections that were also factored into the Regional Air Quality Strategy. The Housing Element Update would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, nor would it result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Lastly, because the Housing Element Update does not affect land uses that are typically associated with the creation of objectionable odors (such as rendering plants, landfills, treatment plants, etc.), its adoption would have no impact from odors.

The Safety Element is a policy document that establishes the City’s goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does not propose any policies or actions that would result in impacts to air quality. The policies related to Goal 1 and Goal 2 would likely improve the City’s air quality, as these strategies aim to prioritize multi-modal transportation and electric vehicles, as well as increase the City’s tree canopy.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts to air quality. The policies and actions related to Goal 1 would likely improve the City’s air quality, as these strategies aim to increase the City’s tree canopy.

Based on the above, the Housing Element Update, Safety Element Update and Environmental Justice Element would have a less than significant impact on air quality.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Explanation of Checklist Judgements:

a–f: Less than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas where little or no native vegetation exists and where little potential exists for the occurrence of sensitive species habitat, riparian habitat, a sensitive natural community, federally protected wetlands, or wildlife corridors or nursery sites.

The Safety Element is a policy document that establishes the City’s goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. Therefore, its adoption would not, in itself, produce environmental impacts. The Safety Element contains policies related to Goal 2 that would increase the City’s tree canopy and maintain a diversity of tree species, which would likely improve the overall habitat within the City.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts to biological resources. The policies and actions related to Goal 1 would increase the City’s tree canopy and maintain a diversity of tree species, which would likely improve the overall habitat within the City.

The City of El Cajon General Plan (2000) contains policies related to protection and preservation of sensitive biological resources. Pertinent goals and policies related to sensitive biological resources are listed below.

- Policy 5-6.4: The City will require residential developments to respect the natural topography by avoiding excessive grading and promoting planned or clustered developments in hillside and other areas containing sensitive physical and biological features and open spaces worthy of preservation.
- Policy 8-1.1: The City shall support and cooperate with the ongoing conservation work of other governmental jurisdictions and other governmental agencies.
- Policy 8-2.1: The retention of the unique natural features of a development site such as rock outcroppings, native vegetation and trees shall be encouraged.
- Policy 8-7.1: Appropriate measures shall be required for the protection of any rare or endangered animal or plant species located in an area to be developed. Methods of compensation to the property owners should be explored to assist in the preservation of such species.
- Policy 8-7.2: The City shall consider imaginative and effective measures to preserve unique species and habitats, including, but not limited to relocation of the species, creation of open space preserves and transfer of development rights.

The Housing, Safety, and Environmental Justice Elements do not alter any local, regional, State, or Federal biological protection standards, nor would they alter the City’s existing general plan policies related to protection and preservation of sensitive biological resources. Although the policies and objectives of the Housing Element encourage housing, any new housing would have to comply with all current biological preservation policies, standards, and regulations. The proposed Housing, Safety and Environmental Justice Updates do not encourage housing or development to be located in stream corridors, wetlands, riparian areas, or any other type of habitats for endangered or threatened species. Therefore, the Housing Element Update, Safety Element Update and Environmental Justice Element would have a less than significant impact on biological resources.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

a–c: Less than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation.

The Safety Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. Therefore, its adoption would not, in itself, produce environmental impacts.

The Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to improving communities and reducing inequities within the City.

The City of El Cajon General Plan (2000) contains policies for the protection of cultural resources, and all new development must be consistent with these policies. Policies 14-1.1, 14-1.3, 14-2.1, and 14-2.2 of the City of El Cajon General Plan (2000) are aimed at the protection of historic buildings. Additionally, Chapter 17.55 (Historic Preservation Ordinance) of the Municipal Code focuses on the identification and designation of historic resources. AB 52 requires early consultation with culturally affiliated tribes in the area. As future projects are planned and developed, they must adhere to these General Plan policies, Municipal Code regulations, and AB 52 as it pertains to historical and culturally sensitive resources.

Relative to human remains, there are no known burial sites or cemeteries within the vicinity of the City. Therefore, it is not expected that human remains would be disturbed as a result of implementation of the project. In the unlikely event that human remains are discovered, then the provisions set forth in California Public Resources Code section 5097.98 and state Health and Safety Code section 7050.5 would be implemented in consultation with the assigned Most Likely Descendant as identified by the NAHC. No further construction activities would be permitted until the coroner is contacted, as well as any applicable Native American tribes. The City shall be required to comply with the California Native American Graves Protection and Repatriation Act (2001), the federal Native American Graves Protection and Repatriation Act (1990), as well as AB 52 early consultation requirements. As regulations are in place to treat any inadvertent uncovering of human remains during grading, impacts to human remains would be less than significant

The Housing Element Update, Safety Element Update, and Environmental Justice Element would not change or alter policies to protect and/or review cultural resources. Therefore, impacts are less than significant.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation of Checklist Judgements:

a–b. Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. However, future development would be required to adhere to all state and/or local plans for renewable energy or energy efficiency.

The Safety Element is a policy document that establishes the City’s goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Safety Element Update does not propose any policies or actions that would result in impacts to energy. Alternatively, the Safety Element includes policies aimed at prioritizing clean energy, such as Policy 4.2 and encouraging green development and cool roofs, such as Policy 2.2.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts to energy.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would result in less than significant impacts associated with energy.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

a-f: Less than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental

impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation.

a: As El Cajon lies within a region known to be seismically active, the potential exists for people and structures associated with new residential projects to be exposed to strong ground shaking, ground failure, and soil instability. The Rose Canyon Fault Zone is the nearest active fault system to the City, and is located approximately 13 miles west of the City. Major tectonic activity associated with these and other faults within this regional tectonic framework consists primarily of right-lateral strikeslip movement. Given the close proximity of the Rose Canyon fault system to the City, a strong earthquake on this fault could produce severe ground shaking in the City. Despite the potential of the Rose Canyon fault system to produce severe ground shaking in the City, no significant impact regarding fault hazards would occur, because the Housing Element Update would be consistent with the other elements of the General Plan, including the Safety Element. Additionally, the potential for significant adverse impacts to result from these phenomena would be substantially reduced through adherence to requirements specified in the Alquist-Priolo Act, the Uniform Building Code, Title 24 of the California Building Code, and all development regulations of the City. Compliance with these building standards would minimize impacts associated with seismic hazards.

b–e: Most lowland areas with relatively level ground surface are not prone to landslides. Other forms of slope instability are also unlikely to occur except along stream banks and terrace margins. The highland areas are more susceptible to slope instability. The strong ground motion that occurs during earthquakes is capable of inducing landslides and debris flow (mudslides). These types of failure generally occur where unstable slope conditions already exist. The City has in place geologic review procedures to address these hazards. Hillside areas with landslide potential are of particular concern, and slope stability requires appropriate treatment of vegetative cover during and after residential development. The City's General Plan and zoning designations do not prohibit new development on areas of geologic hazard; however, many precautionary recommendations and restrictions are established in the policies and Municipal Code in order to minimize potential impacts from developing on geologically hazardous land or resulting in substantial soil erosion. City regulations and policies cover landslides, seismic shaking, surface rupture, seiches, liquefaction, subsidence, expansive soils, and soil erosion. All new development is required to be consistent with these regulations.

f: Depending on the location, future development in the City has the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. The existing General Plan contains policies for the protection of paleontological resources, and all new development must be consistent with these policies. The Housing Element Update would not change or alter these policies.

The Safety Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does propose updated goals, policies and actions that support the reduction of impacts related to natural hazards (e.g. ground shaking and liquifaction); specifically those policies and actions associated with Goal 3, Goal 4 and Goal 5.

The Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element would not change or alter policies related to geology and soils.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would result in less than significant impacts associated with geology and soils.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

a–b: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation.

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 2021). The increase in GHGs results in global warming, as more heat is trapped in the atmosphere.

The City adopted the Sustainability Initiative in May 2019, which is intended to reduce GHG emissions on a community-wide level through actions to reduce vehicles miles traveled through eight primary strategies. These consist of increasing the use of zero-emission vehicles, reducing fuel use, reducing vehicle miles traveled, increasing building energy efficiency, increasing renewable and zero-carbon energy, increasing water efficiency, reducing and recycling solid waste, and carbon sequestration. The plan, which includes community-wide and City operations-focused goals and measures, identifies a path forward to meeting the California 2030 target of reducing emissions to 40 percent below 1990 levels by 2030 as established by Executive Order B-30-15 and places the City on a trajectory toward meeting the longer-term goal of an 80 percent reduction below 1990 levels by 2050.

Future residential projects that may developed to meet the RHNA requirement are expected to be located on infill sites where pedestrian- and transit-oriented development is highly feasible and would be encouraged. Such development should reduce the number of new vehicle trips typically associated with residential projects and, thus, would help reduce GHG production resulting from the combustion of fossil fuels for transportation purposes. Based on the above, the Housing Element Update would result in less than significant impacts associated with greenhouse gas emissions. New development projects will be required to comply with the Green Building Code, which also reduces GHG emissions.

The Safety Element is a policy document that establishes the City’s goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does not propose any policies or actions that would result in impacts to greenhouse gas emissions. The policies related to Goal 1 and Goal 2 as these strategies aim to reduce greenhouse gas emissions and increase the City’s tree canopy within the City.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts greenhouse gas emissions. The policies and actions related to Goal 1 would increase the City’s tree canopy and would likely reduce the overall greenhouse gas emissions within the City.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would have a less than significant impact on greenhouse gas emissions.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation of Checklist Judgements:

a–c and e–g: No Impact. d: Less Than Significant Impact.

a–c: The Housing Element Update is a policy document, and therefore, its adoption would not, in itself, result in potential impacts from hazards and hazardous material that may endanger residents or the environment. Implementation of the updated Housing Element would also not result in the routine use, transport, or disposal of hazardous materials or generate significant quantities of hazardous materials.

d: The Housing Element Update is a policy document and its adoption will not, in itself, result in environmental impacts. However, implementation of the programs contained in the document will accommodate development required to meet El Cajon's RHNA allocation. The sites of proposed future residential projects will be evaluated using appropriate databases including the California Department of Toxic Substances Control EnviroStor database that, pursuant to Government Code section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action sites. The potential impacts related to any listed hazardous materials sites associated with any specific future residential projects will be assessed at the time the projects are actually proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA.

e–g: The Housing Element Update would be consistent with General Plan policy. This includes the City's emergency response plan and any impacts related to air safety. Gillespie Field Airport is located within the City. The Housing Element Update would be consistent with its current airport land use compatibility plan. Therefore, the Housing Element Update would result in no impact relative to airport hazards. Additionally, the Housing Element Update would not expose people to wildfire hazards.

Future development would be consistent with the City's emergency response plans related to risk from fire. Based on the above, the Housing Element Update would result in no impact on hazards or hazardous materials.

The Safety Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does propose updated goals, policies and actions that support the reduction of impacts related to natural (e.g. ground shaking) and human-caused hazards (e.g. chemical spill); specifically those policies and actions associated with Goal 3, Goal 4, Goal 5 and Goal 6.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts related to hazards and hazardous materials.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would have a less than significant impact on hazard and hazardous materials.

3.10 Hydrology and Water Quality

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

Explanation of Checklist Judgements:

a, c–d: Less than Significant Impact. b and e: No Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. Future residential development that would qualify to meet the RHNA requirement is expected to be located on infill sites in urbanized areas, and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with hydrology and water quality.

a: Wastewater is collected and transmitted to the San Diego Metropolitan Sewer District for treatment. All demolition, relocation and/or construction phases of future housing development would be subject to compliance with applicable local, regional, state and federal regulations designed to protect water resources, including those regulations requiring implementation of Best Management Practices (BMPs), preparation of Stormwater Pollution Prevention Plans (SWPPPs), and submittal of Erosion Control Plans in compliance with National Pollution Discharge Elimination System (NPDES) provisions. Consistency with this regulatory framework would adequately ensure that such impacts would be avoided or reduced to less than significant. The Housing Element Update would not generate a significant impact on water quality over current projections for population and housing units.

b: The Helix Water District and Padre Dam Municipal Water District provide potable water in the City. Therefore, implementation of the Housing Element update would not deplete groundwater supplies.

c–d: City regulations prohibit new development that would create runoff volumes or velocities that may cause the City's existing drainage system to exceed its design capacity. In regard to risks due to dam or levee failure, the City is not located within an area that would be impacted by any dam or levee failure. Seiche and mudflow risk would also be negligible, as the City is not located near a large contained body of water or downslope from an unstable hillside. With regard to tsunami risk the City is not located within a mapped tsunami inundation area. Based on the above, the Housing Element Update would result in no impact or a less than significant impact on or from hydrology and water quality.

e: As stated above, the Helix Water District and Padre Dam Municipal Water District provides potable water to the City. The Housing Element Update would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan associated with the Helix and Padre Dam Municipal Water Districts. The City is a member of the East County Advanced Water Purification Authority, formed to provide a sustainable source of potable water through the treatment of wastewater, which will then be returned to both Helix and Padre Dam Water Districts for ultimate reuse for customers.

The Safety Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does not propose any policies or actions that would result in impacts related to hydrology and water quality.

The Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts related to hydrology and water quality.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would have a less than significant impact on hydrology and water quality.

3.11 Land Use and Planning

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

Explanation of Checklist Judgements:

a: No Impact. b: Less than Significant.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. Although implementation of the programs contained in the document would encourage residential development required to meet El Cajon's RHNA allocation, such residential projects are expected to be located on infill sites within existing neighborhoods, and because infill sites are part of the existing urban fabric, projects developed on them would not be likely to physically divide an established community. The proposed update would not conflict with General Plan policy or Municipal Code regulations, adopted for the purpose of avoiding or mitigating an environmental effect. As there are no approved habitat conservation or natural communities conservation plans applicable to infill sites, residential development would not conflict with such plans.

The Safety Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The Safety Element Update does not propose any policies or actions that would result in physically dividing an existing community. Additionally, the current Safety Element Update would not conflict with General Plan policy or Municipal Code regulations, adopted for the purpose of avoiding or mitigating an environmental effect. As there are no approved habitat conservation or natural communities conservation plans applicable to infill sites, residential development would not conflict with such plans.

The Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in physically dividing an existing community. Additionally, the

Environmental Justice Element would not conflict with General Plan policy or Municipal Code regulations, adopted for the purpose of avoiding or mitigating an environmental effect. As there are no approved habitat conservation or natural communities conservation plans applicable to infill sites, residential development would not conflict with such plans.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would have a less than significant impact on land use and planning.

3.12 Mineral Resources

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

Explanation of Checklist Judgements:

a and b: No Impact.

There are no known mineral resources of significant value or categorized as locally important within the City that would be lost due to residential development facilitated by the Housing Element Update. There would be no impact to mineral resources associated with adoption of the Housing Element Update, Safety Element Update, or Environmental Justice Element.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation of Checklist Judgements:

a–b: Less Than Significant Impact. c: No Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. The majority of such development is expected to be located on infill sites. Adherence to the City's Noise Ordinance and compliance with General Plan Noise Element Polices would ensure that any such noise and vibration increases, both temporary and permanent, would result in less than significant impacts within project areas. Furthermore, potential development would be consistent with the airport land use compatibility plan for Gillespie Field.

The Safety Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does not propose any policies or actions that would result in impacts related to noise.

The Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts related to noise.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would have a less than significant impact on noise.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

a–b: Less Than Significant Impact.

The Housing Element Update utilizes the 2021-2029 RHNA to plan for and accommodate population growth. Therefore, it would not induce population growth within the City. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. Future development would occur on vacant or underutilized sites. With the implementation of programs in the Housing Element Update to increase housing capacity, there would be adequate land available to accommodate the City's RHNA allocation. Therefore, the update would not necessitate the construction of replacement housing elsewhere (outside of the City) or result in environmental impacts related to growth. Based on the above, the Housing Element Update would result in a less than significant impact associated with population and housing.

The Safety Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does not propose any policies or actions that would result in impacts related to population and housing.

The Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts related to population and housing.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would have a less than significant impact on population and housing.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

a(i–v): Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. As a highly urbanized community, all of the residentially designated land in El Cajon is served with sewer and water lines, streets, storm drains, and other infrastructure and utilities.

The Safety Element is a policy document that establishes the City’s goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does not propose any policies or actions that would 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.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would 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.

The Housing Element Update, Safety Element Update, and Environmental Justice Element, therefore, would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which

could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services listed above. These general plan updates would not change or impact standards, policies, programs, and regulations in place that ensure adequate provision of public services. Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would have a less than significant impact on public services.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

a-b: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program. No specific recreational facilities or the construction or expansion of recreational facilities that might have an adverse physical effect on the environment are included in the Housing Element Update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. The availability, maintenance, and management of park and recreation facilities are covered under the General Plan and the City's Capital Improvement Program. Additionally, the City's Zoning code and Transit District Specific Plan describe the open space requirements to which future residential projects must adhere. Based on the above, the Housing Element Update would result in a less than significant impact on recreation.

The Safety Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does not propose any policies or actions that would result in impacts related to recreation.

The Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element's Goal 5 could result in the expansion of park and recreational facilities within the City; however, no specific project is

proposed as part of the policy document. The potential impacts related of any specific future recreational facilities expansion projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would have a less than significant impact on recreation.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

a–d: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. The development anticipated by the Housing Element would occur primarily on urban infill sites and consist primarily of multi-family and mixed-use development. Therefore, future development associated with implementation of the Housing Element Update would be expected to generate fewer vehicle miles traveled and more multi-modal trips than conventional development. Potential traffic impacts related to increased transportation system demands associated with specific future residential projects would be assessed at the time the projects are actually proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. 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. Based on the above, the Housing Element Update would result in a less than significant impact on transportation/traffic.

The Safety Element is a policy document that establishes the City’s goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update Goal 1 proposes policies that would encourage the development of an Active Transportation Plan, addition of electric vehicle charging stations, and promoting transit-oriented development.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts related to transportation.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would have a less than significant impact on transportation.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
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:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

a–b: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental

impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. The City's Existing General Plan (2000) contains policies for the protection of cultural resources, and all new development must be consistent with these policies. The Housing Element Update would not change or alter policies to protect tribal cultural resources.

The Safety Element is a policy document that establishes the City's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update would not change or alter policies to protect tribal cultural resources.

The Environmental Justice Element is a policy document that establishes the City's goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element would not change or alter policies to protect tribal cultural resources.

Two tribes have requested notification pursuant to AB 52. The Mesa Grande Band of Mission Indians and the Jamul Indian Village tribes were notified and invited to consult via mail on April 12, 2021. No responses were received.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would result in less than significant impacts to tribal cultural resources.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation of Checklist Judgements:

a–c and e: No Impact. c: - Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. Because the development anticipated by the Housing Element would occur primarily on infill sites already served by well-established utilities service systems, the need for the expansion of existing systems or the construction of new systems, in compliance with applicable statutes and regulations, would be less than significant.

The Safety Element is a policy document that establishes the City’s goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does not propose any policies or actions that would result in impacts related to utilities and service systems.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts related to utilities and service systems.

Based on the above, the Housing Element Update, Safety Element Update, and Environmental Justice Element would have a less than significant impact on utilities and service systems.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

a–d: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet El Cajon's RHNA allocation. Development anticipated by the Housing Element would occur primarily on infill sites. The Housing Element does not include any rezoning to greater densities within the Very High Fire Hazard Severity Zones (VHFHSZ). Therefore impacts associated with wildfire would be less than significant.

The Safety Element is a policy document that establishes the City’s goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the City. The current Safety Element Update does propose updated goals, policies and actions that support the reduction of impacts related to wildfire; those policies and actions associated with Goal 3, Goal 4 and Goal 5 and specifically Policy 3.3: implement programs and standards to mitigate wildfire risk in high wildfire hazard severity zones.

The Environmental Justice Element is a policy document that establishes the City’s goals, policies and actions related to improving communities and reducing inequities within the City. The Environmental Justice Element does not propose any policies or actions that would result in impacts related to wildfire.

Based on the above, the Housing Element Update, Safety Element Update and Environmental Justice Element would have a less than significant impact on wildfire.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

a–c: Less Than Significant Impact.

As discussed throughout the above portions of the Initial Study Checklist, the Housing Element Update, Safety Element Update and Environmental Justice Element are policy documents and adoption of these Elements alone would not produce environmental impacts. Although implementation of the programs contained in the Housing Element Update would accommodate development required to meet El Cajon's RHNA allocation, the Housing

Element does not identify, describe, promote, entitle, or permit any particular residential development project. The Safety Element Update and Environmental Justice Element are also policy documents that do not identify, describe, promote, entitle, or permit any particular development projects.

The Housing Element Update, Safety Element Update, and Environmental Justice Element do not change the allowed densities or type of development that may occur within the City. The act of adopting the Housing Element Update, Safety Element Update or the Environmental Justice Element does not, therefore, have the potential to result in environmental impacts, either limited or cumulative, affecting habitat; plant or animal communities; rare, endangered or threatened species; historic resources; or human beings.

4 References

4.1 References Cited

14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.

City of El Cajon, 1998. City of El Cajon General Plan 2000, adopted on January 8, 1991 and amended on February 10, 1998. Available at: <https://www.cityofelcajon.us/home/showdocument?id=140>

U.S. Environmental Protection Agency, 2021. Webpage: Climate Change Indicators: Atmospheric Concentrations of Green House Gases. Viewed April 2021. Available at: <https://www.epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases>