TRIBAL ENVIRONMENTAL IMPACT REPORT

Sycuan Lease – Training Campus Project
San Diego County, California

Prepared for: Sycuan Band of the Kumeyaay Nation
August 2023

acorn environmental

NOTICE OF COMPLETION
TRIBAL ENVIRONMENTAL IMPACT REPORT FOR THE
SYCUAN LEASE AND TRAINING FACILITY PROJECT

Notice Date: August 18, 2023

The Sycuan Band of the Kumeyaay Nation (Tribe) is considering entering into a land lease for the development of a soccer training facility and youth academy (Project) on the Tribe's Reservation in San Diego County, California. The lease area includes approximately 28 acres on the northwestern portion of the Reservation. The Project Site is bordered by Dehesa Road to the north and Willow Glen Drive to the west. The lease area is currently developed with portions of the Singing Hills Golf Resort, including the Pine Glen Golf Course, Singing Hills Hotel, and driving range. The Project would consist of retrofitting the existing hotel into classroom, dormitory facilities, and offices, and construction of a new approximately 50,000-square foot training facility building, five soccer fields, one goalkeeper training field, other open air training areas, and ancillary circulation and infrastructure improvements.

The TEIR has been prepared to comply with the Tribe's Business Leasing Regulations under the Helping Expedite and Advance Responsible Tribal Home Ownership (HEARTH) Act. The purpose of the TEIR is to identify and describe all direct significant environmental effects of the proposed lease, and to identify best management practices and mitigation measures to avoid and/or minimize the potential for environmental effects.

The TEIR is available for review online at https://www.acorn-env.com/sycuanteir or https://www.sycuanteir.com, and in print at the El Cajon Branch of the San Diego County Library located at 201 E Douglas Ave, El Cajon, CA 92020. The TEIR is publicly available for a 30-day period beginning on August 18, 2023, and ending on September 16, 2023. All relevant and substantive comments on the TEIR that are received by September 16, 2023, will be considered by the Tribe. Comments may be submitted in writing to the following email or address with the subject heading: "RE: Comments on the Sycuan Lease and Training Facility TEIR":

Email: jwade@acorn-env.com

Mail: Acorn Environmental
ATTN: Jennifer Wade
5170 Golden Foothill Parkway
El Dorado Hills, CA 95762

Table of Contents

List of Figures

List of Tables

List of Appendices

Section 1 | Introduction

1.1 SUMMARY OF THE PROPOSED PROJECT AND ENVIRONMENTAL REVIEW PROCESS

The Sycuan Band of the Kumeyaay Nation (Tribe) is considering entering into a land lease for the development of a professional soccer training facility and youth academy (Project) within Tribal trust land currently developed with the Pine Glen Golf Course and Singing Hills Golf Resort. The Project would consist of retrofitting the existing Singing Hills Hotel into classroom, dormitory facilities and offices, and construction of a new approximately 50,000-square foot training facility, five soccer fields, one goalkeeper training field, other open air training areas, and ancillary circulation and infrastructure improvements.

The Tribe's consideration of the proposed land lease is subject to compliance with the environmental review process outlined in Article VIII of the Tribe's Helping Expedite and Advance Responsible Tribal Home Ownership (HEARTH) Act Business Leasing Regulations. Article VIII states that lease approvals subject to the environmental review process require:

> "the preparation of a comprehensive environmental impact report, analyzing the potentially Significant Environmental Impacts of the proposed Project on the environment. The environmental impact report shall provide detailed information about Significant Environmental Impacts that the Lease is likely to have, and shall include a detailed statement setting forth all of the following:
>
> (a) A description of the physical environmental conditions in the vicinity of the Project (the environmental setting and existing baseline conditions), as they exist at the time the environmental impact report is prepared.
> (b) All Significant Environmental Effects of the proposed Lease.
> (c) Any mitigation measures proposed, recommended, or required."

This Tribal Environmental Impact Report (TEIR) has been prepared for the Tribal Council in accordance with Article VIII of the Tribe's HEARTH Act Regulations to identify and describe all direct Significant Environmental Effects of the proposed lease, and to identify best management practices and mitigation measures to avoid and/or minimize the potential for environmental effects.

The TEIR will be publicly available for a 30-day period. Comments will be considered by the Tribe, and responses will be provided to all relevant and substantive public comments on any Significant Environmental Effects arising as a result of the Project and proposed or recommended mitigation measures. After the TEIR process is complete, the Tribe may issue a decision on the proposed lease.

1.2 LOCATION AND SETTING

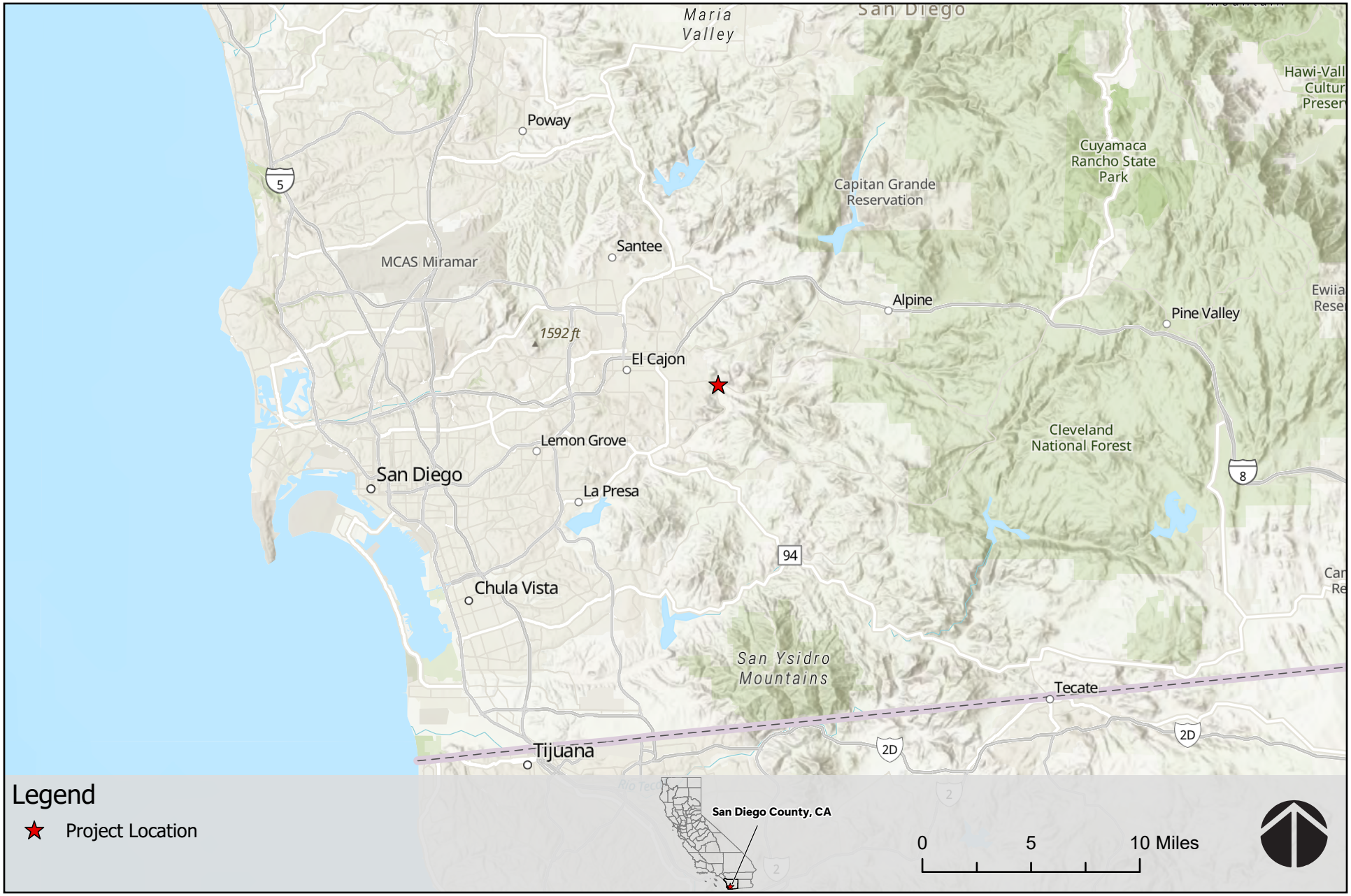
The Tribe's Reservation[1] encompasses approximately 2,250 acres in San Diego County, approximately 13 miles east of downtown San Diego near El Cajon in the Dehesa Valley/Crest area (**Figure 1.2-1**). The Project Site is located on 28 acres within the existing Pine Glen Golf Course at the Singing Hills Golf Resort, located within the northwestern portion of the Reservation. The Project Site is located entirely within Tribal trust land. Adjacent off-Reservation roadways to the Project Site include Dehesa Road to the north and Willow Glen Drive to the west. (**Figure 1.2-2** and **Figure 1.2-3**).

It should be noted that for the purposes of this TEIR, the term Project Site refers to the approximately 28-acre lease property. Off-site improvement areas include areas beyond the boundaries of the lease that would be improved or impacted as a result of the Project, including drainage and stormwater improvements, driveways, and other utilities as described further in **Section 2.11**.

The Project Site currently encompasses a portion of the Pine Glen Golf Course and the entire Singing Hills Hotel, including hotel rooms, golf course greens, amenity and maintenance buildings, parking lots, landscaping, and ornamental trees. The Project Site is relatively flat, developed land at an elevation of approximately 490 feet above mean sea level (amsl), with gentle hills and slopes that have been incorporated into the golf course landscape.

The Project Site is surrounded by the following on-Reservation uses and resources: golf course facilities to the east and south; the Sweetwater River to the south; and Tribal cultural facilities to the southwest. The Project Site is surrounded by the following off-Reservation uses: undeveloped hillslopes and Dehesa Road to the north; and single-family homes, undeveloped hillslopes and Willow Glen Drive to the west.

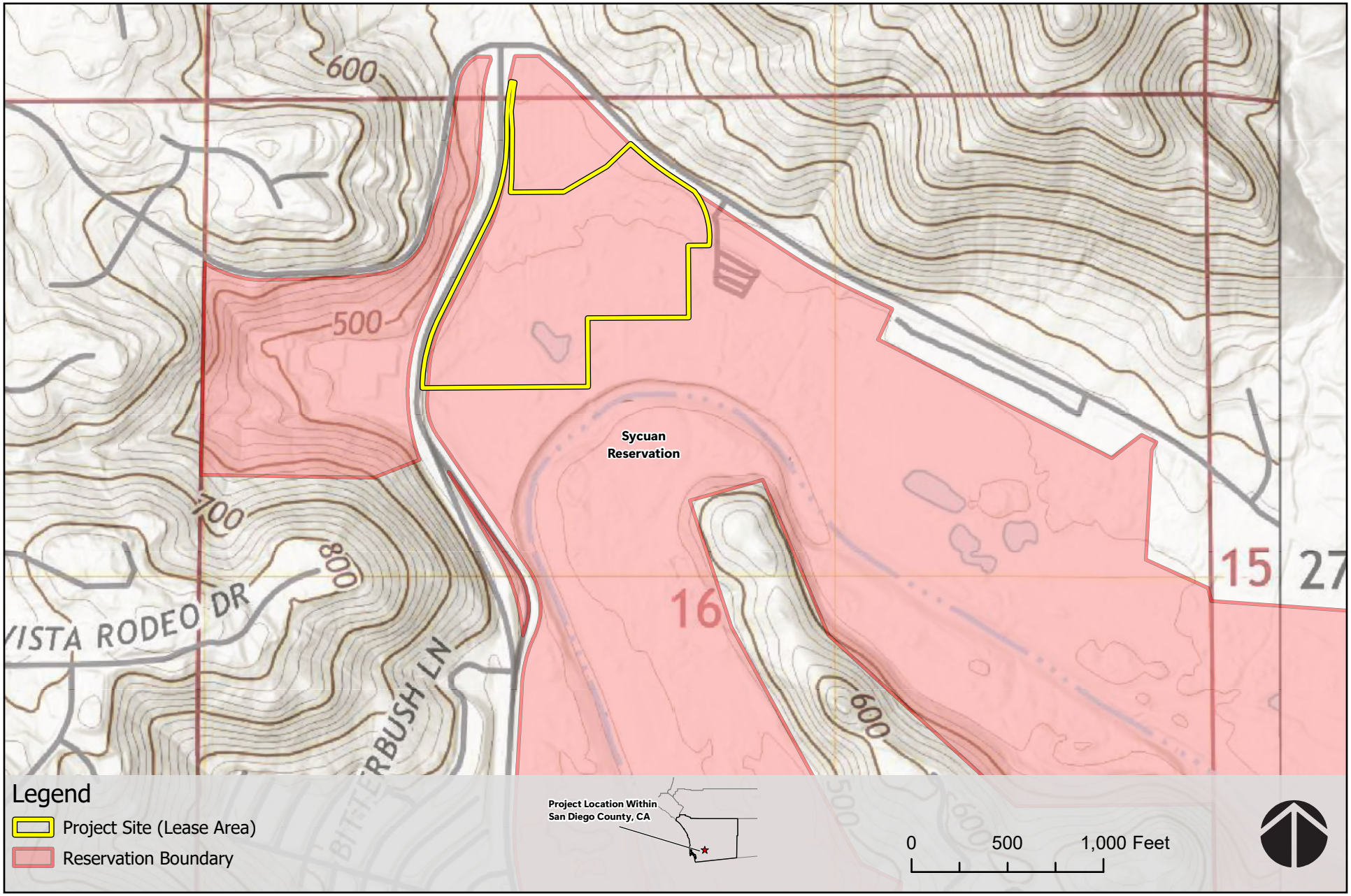
[1] The term Reservation used herein refers to all Tribally-owned and managed trust land, including land taken into trust since the establishment of the original Reservation, as well as the original Reservation itself.



Esri, CGIAR, USGS, SanGIS, California State Parks, Esri, HERE, Garmin, Foursquare, SafeGraph,

FIGURE 1.2-1

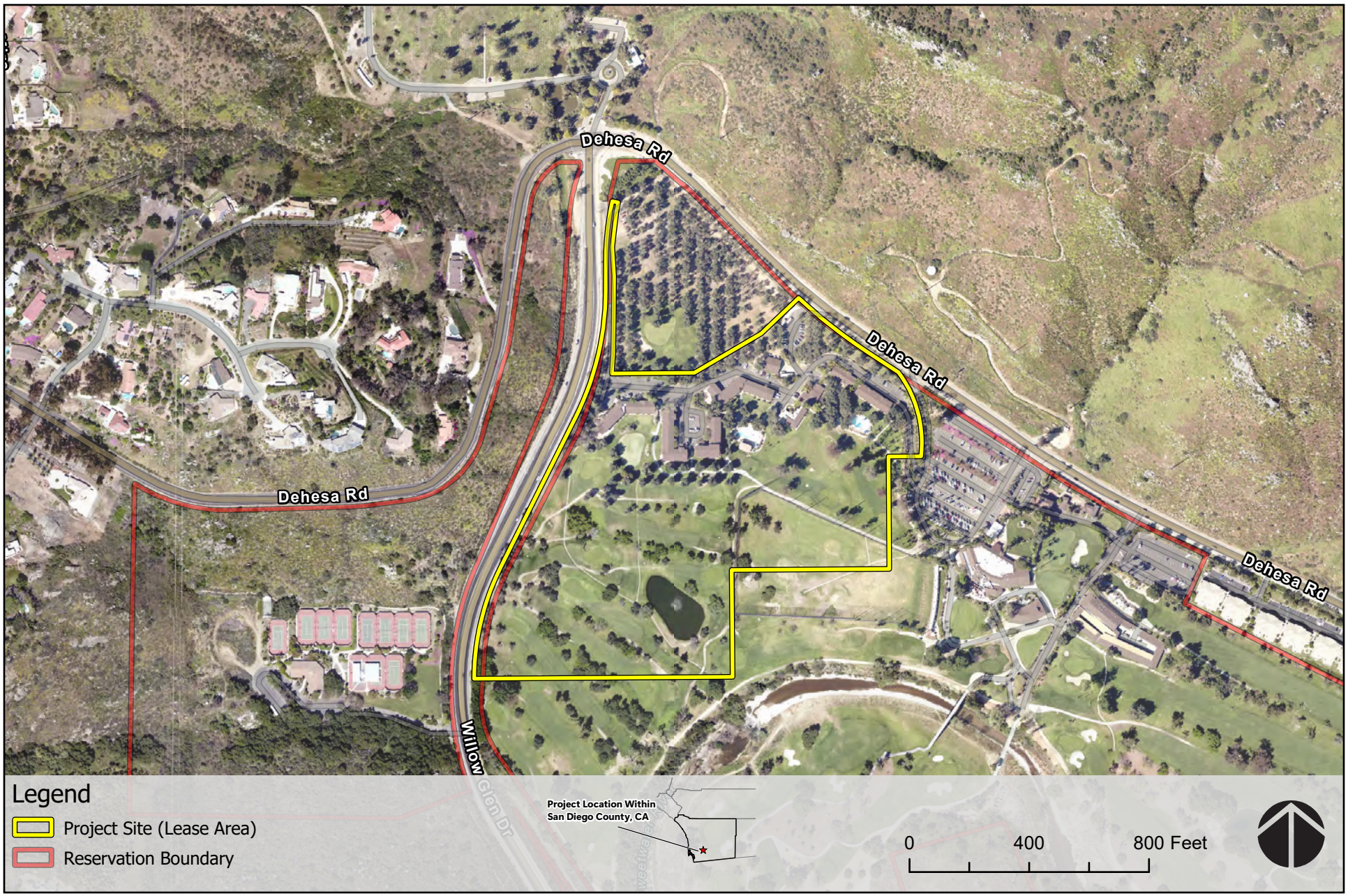
REGIONAL LOCATION



USGS National Map, Esri, NASA, NGA, USGS, FEMA

FIGURE 1.2-2

SITE AND VICINITY



SANDAG & SanGIS, Esri Community Maps Contributors, SanGIS, California State Parks, ©

FIGURE 1.2-3

AERIAL OVERVIEW

1.3 DOCUMENT ORGANIZATION

This TEIR includes the following:

- **Section 1** provides a summary of the Project and describes the location of the Project Site.
- **Section 2** provides a detailed description of the Project.
- **Section 3** provides a description of the existing environmental conditions on and in the vicinity of the Project Site, an analysis of the potential environmental consequences associated with the Project and off-site improvements.
- **Section 4** provides mitigation measures for identified adverse impacts.
- **Section 5** provides the references utilized within the TEIR.
- **Section 6** provides the information for the preparers of the TEIR.
- **Appendices** provide additional technical information.

Section 2 | Project Description

This section describes the Project analyzed within this TEIR.

2.1 PROJECT COMPONENTS

The proposed lease would allow for the development of a Professional Soccer Training Facility and Youth Academy Training campus (Project) within Tribal trust land currently developed with the Singing Hills Hotel and Pine Glen Golf Course. The Project includes retrofitting the existing Singing Hills Hotel into classroom, dormitory facilities, and offices, which is over half of the structural and impervious area proposed within the Project Site. The Project also includes construction of a new approximately 50,000-square foot training facility building, five full-sized soccer fields (including 3 natural turf and 2 synthetic), one half-size goalie training field, open air training areas, and ancillary circulation and infrastructure improvements. Other proposed facilities include a 2,500-square foot maintenance building and a 2,500-square foot maintenance carport. A site plan is provided in **Figure 2.1-1**.

2.1.1 Soccer Training Facilities and Building

At the center of the development is a proposed two-story 50,000 square-foot training facility building of up to 40 feet in height. The interior spaces would be divided between the professional training facility (29,000 square feet), the youth academy training facilities (15,500 square feet) and shared dining facilities (5,500 square feet). Daylighting would be provided to achieve a reduction in dependance on artificial lighting. The architecture of the building would incorporate materials and colors to integrate with the natural characteristics of the surrounding areas. **Figure 2.1-2** provides an architectural rendering of the proposed training facility building.

The proposed youth and professional success training facilities will consist of the following amenities:

1. Training Pitches:
    i. Three (3) Full-sized Training Pitches - Natural Turf
    ii. Two (2) Full-sized Training Pitches - Artificial Turf
    iii. Half-sized Goalie Training Pitch - Natural Turf
2. Training Agility Areas:
    i. Two (2) Training Agility Areas - Artificial Turf
3. Multipurpose Sport Court:
    i. One (1) Multipurpose Sport Court - Basketball & Futsal

Ball netting between 32 and 35 feet in height would generally be utilized on the northern and southern sides of pitches to prevent soccer balls from straying outside of the pitch. Additional ball netting would be utilized along the eastern and western sides of pitches near the Project Site boundaries to prevent soccer balls from straying outside of the Project Site.

Gensler, ESRI, Maxar

FIGURE 2.1-1

SITE PLAN

FIGURE 2.1-2

ARCHITECTURAL RENDERING

2.1.2 Dormitory Facilities and Youth Academy School

The existing Singing Hills Hotel will be repurposed and renovated into a youth academy school that would provide education for students living on campus, and dormitory facilities for students, professional players, and staff working on campus. The youth academy and training facility would accommodate students between 9 to 16 years old, grades 4 through 10.

The following tiers categorize the scope of the renovation work based on the level of changes and improvements required for the existing facilities:

- Tier 1 - No Renovations
- Tier 2 - Light Renovation, Paint, cosmetic repairs (as needed)
- Tier 3 - Medium Renovation, Some removal of interior partitions, some new interior partitions, minor structural interior support, minor rework of mechanical, electrical, and plumbing systems with some new interior finishes
- Tier 4 - Heavy Renovation, Full removal of interior partitions, new structural interior support, overhaul of mechanical, electrical, and plumbing systems with new interior finishes

Table 2.1-1 provides an overview of the proposed uses for each existing building as labeled on **Figure 2.1-1** and the level of renovations needed.

Table 2.1-1: Building Renovation Summary

Building	Purpose	Renovation Tier
School Program – 12,016 square feet		
A	Classrooms	Tier 4
B	Offices, Administration	Tier 4
C	Classrooms, Staff Room, Storage	Tier 4
D	Library, Meditation Room, Counseling	Tier 4 (Library), Tier 3 (Meditation Room, Counseling)
Dorm Accommodations – 35,595 square feet (60 units)		
E	Active Lounge, Gaming	Tier 3
F	Junior Girls Dorms (13 units), Staff Residences (2 units), Sick Bay, Common Room, Support Room(s)	Tier 2 (Junior Girls Dorms, Sick Bay), Tier 3 (Staff Residences), Tier 4 (Common Room), Tier 1 (Support Room(s))
G	Junior Boys Dorms (13 units), Staff Residences (2 units), Sick Bay, Common Room, Support Room(s)	Tier 2 (Junior Boys Dorms, Sick Bay), Tier 3 (Staff Residences), Tier 4 (Common Room), Tier 1 (Support Room(s))
H	Senior Boys Dorms (12 units), Staff Residences (3 units), Common Room, Support Room(s)	Tier 2 (Senior Boys Dorms), Tier 3 (Staff Residences), Tier 4 (Common Room), Tier 1 (Support Room(s))
J	Additional Dorms (11 units), Staff Residences (4 units), Head Teacher's House	Tier 1 (Additional Dorm), Tier 3 (Staff Residences), Tier 4 (Head Teacher's House)
K	Central Laundry, General Storage, Security Office	Tier 2 (Central Laundry, General Storage), Tier 3 (Security Office)

2.2 GENERAL AND EVENT OPERATIONS

2.2.1 Youth Academy Soccer Training Facility

The proposed youth academy school and soccer training facilities would operate from approximately 6:30 AM to 7:00 PM, including academy training sessions. The youth academy is anticipated to have a staff of 30 teachers, trainers, coaches, and administrative personnel. All of the students and approximately 15 academy staff are anticipated to live on campus in the dormitory facilities.

2.2.2 Soccer Training Facility

There would be approximately 60 team players and staff accessing the professional soccer training facility on a daily basis including 30 team players, 15 coaching and other staff, and 15 office personnel. Players and coaching staff would not access the facility during the off-season and during travel. Training sessions would typically take place from around 8:00 AM to 3:00 PM, six days a week. Players and staff would be traveling to and from the site during these hours.

2.2.3 Special Events

The training facility would typically host one special event per month, which would generate approximately 25 additional guests on-site. These events may include scrimmages, visiting teams, press-related special announcements, or other similar activities. Parents' weekends are anticipated to be hosted twice a year, accommodating an additional 150-plus visitors. Additionally, there will be graduation programming for eighth graders, and the facilities may host soccer camps during the fall, spring, and summer periods. Visitation to special events would be on an invitation-only basis, and no large special events with public spectators are proposed.

2.2.4 Site Maintenance Activities

Site maintenance would include mowing, repairing, watering, fertilizing, and aerating the fields. Grass fields may be taken off-line on a rotating basis to allow the grass to recover after heavy use. Site workers would keep the facilities clean and would coordinate collection and disposal of solid waste.

2.3 SITE ACCESS AND SECURITY

The primary site access is proposed along the northeast site boundary, at an existing full-access driveway connected to Dehesa Road which will serve the players, staff, and visitors (#10 on **Figure 2.1-1**). This driveway is currently gated and is not used regularly. A secondary/emergency access point is proposed to connect to the existing parking lot for the golf resort (#11 on **Figure 2.1-1**). A third access point connected to Willow Glen Drive would be used by service vehicles only (#12 on **Figure 2.1-1**). All access points will be gated or controlled by security.

Existing perimeter fencing along Willow Glen Drive would be retained and scrim would be attached for screening and privacy. Security fencing would be added around the remainder of the Project Site, which would include chain-link fence with scrim for screening and privacy.

2.4 LIGHTING

The youth academy training pitches in the eastern portion of the site (furthest from off-Reservation residential areas) will have nighttime sports lighting to accommodate evening practices. Sports lighting will be shielded, downcast, and directed away from the Sweetwater River and surrounding residences. Evening events requiring sports lighting are not expected to regularly go past 10 p.m., as professional players would practice during the day and youth would have a curfew.

Lighting for security and safety will be established throughout the site, particularly in parking areas and at building entrances. Exterior lighting would be integrated into components of the architecture, shielded, and strategically positioned to minimize off-site lighting and any direct sight lines to the public.

2.5 GRADING AND DRAINAGE

Construction would involve grading and earthwork for development of the Project and associated infrastructure. Earth-moving activities would include grading, excavation, stockpiling of soil, development of retaining walls, installation of new facilities, and the use of heavy machinery and equipment. Grading activities would occur on approximately 17.4 acres of the site with approximately 85,000 cubic yards of cut and fill (**Appendix A-1**). The current goal is to balance the site; however, conservatively it is assumed that the Project may require up to 10,000 cubic yards of imported fill.

Drainage on the Project Site generally travels to the south via sheet flow or collects into a network of both vegetated and cement channels that flow south to outfalls above the Sweetwater River. Proposed drainage improvements would mimic these conditions routing stormwater south through the Project Site. Stormwater from existing hotel buildings and parking areas would be collected and conveyed in a new storm drain system under the natural soccer fields to a new off-site detention basin adjacent to the southern Project Site boundary. Drainage from the artificial turf fields, training facility, basketball court and driveway connecting to Willow Glen Drive will be collected and routed through a new off-site storm drain system to a stormwater treatment best management practice (e.g., a bioretention basin, bioinfiltration basin or similar treatment BMP) in the area of the relocated driving range, prior to discharging to the new off-site detention basin. Fields will be pervious with underlying subdrains to ensure proper field conditions. **Section 2.11.2** discusses proposed improvements outside of the Project Site.

2.6 WATER SUPPLY

Proposed water supply improvements within the Project Site are discussed below with discussion of off-site improvements in **Section 2.11.3.**

2.6.1 Potable Water System

Potable water supply for the Singing Hills Hotel is currently provided by a private water storage and distribution system fed by connections to the Otay Water District public water system. The Project includes development of a new on-site potable water system to improve water quality and reliability and the addition of a water meter connected to the existing Otay Water District line in Willow Glen Drive.

The average potable water demand of the Project would be approximately 16,853 gallons per day (GPD) (**Table 2.6-1**). Compared to existing average potable water demand, the Project would result in an increase of approximately 5,353 GPD.

Table 2.6-1: Existing and Proposed Average Water Demand

Type	Existing Demand	Project Demand	Project Impact
Potable	11,500 GPD	16,853 GPD	5,353 GPD (increase)
Non-Potable	31,730[1] GPD	24,700[2] GPD	7,030 GPD (decrease)

Source: **Appendix B**

[1]Non-potable use consists of 16.7 acres of golf course irrigation.

[2]Non-potable use consists of 13.0 acres of new field and landscaping irrigation.

2.6.2 Non-Potable Water System

Non-potable water is used to provide irrigation and fire flow to the Project Site. The existing non-potable water system is a private system on the Reservation that consists of groundwater wells, a storage pond, pumps, and distribution piping. This system would continue to be used for irrigation water for the Project. Existing irrigation piping within the Project Site would be removed and replaced. Irrigation demands would be approximately 24,700 GPD, which is a decrease of approximately 7,030 GPD in comparison to existing non-potable demands (**Table 2.6-1**).

The Project proposes to develop a new redundant supply line for fire protection. New piping would be installed throughout the Project Site with off-site connections to Otay Water District facilities as discussed in **Section 2.11.1**.

2.7 WASTEWATER

The existing wastewater system that serves the Singing Hills Hotel includes public gravity sewer lines which connect to the Otay Water District sewer system. The Project involves development of a new private collection system that will convey wastewater form the Project Site to a new lift station located just south of the Project Site.

Average wastewater generation of the Project would be approximately 14,428 GPD (**Table 2.7-1**). Compared to existing wastewater generation, the Project would result in an increase of approximately 3,503 GPD. Wastewater is further discussed in **Section 3.11**.

Table 2.7-1: Existing and Proposed Average Wastewater Demand

Existing Generation	Project Generation	Increase of Project
10,925 GPD	14,428 GPD	3,503 GPD

Source: **Appendix B**

2.8 ELECTRICITY AND NATURAL GAS

San Diego Gas & Electric Company supplies electricity and natural gas services to the Project Site and would supply such services to the Project. Telephone, cable television, and Internet services are available from Cox Communications. Various satellite companies also provide television service to the area.

2.9 CONSTRUCTION

Construction of the Project would begin in October 2023 and go through December of 2024. Construction would involve site clearing activities, earthwork, excavating and pouring a foundation for the training facility building, steel and wood structural framing, masonry, electrical and mechanical work, and building finishing, among other construction trades. Site clearing activities would include the removal of approximately 100 trees. The Project includes approximately 2.1 acres of new impervious surfaces, including 0.8 acres for building footprint and 1.25 acres for other paved areas, including circulation. The Project has been designed to minimize the amount of impervious surfaces. Construction of the Project would adhere to Tribal standards consistent with the International Building Code (IBC).

2.10 BEST MANAGEMENT PRACTICES AND DESIGN FEATURES

Protective measures and best management practices (BMPs), including regulatory requirements and voluntary measures, have been incorporated into the design of Project. These measures are discussed below in **Table 2.10-1**. These measures shall be integrated into construction documents to ensure compliance.

Table 2.10-1: Best Management Practices and Design Features

Resource Area	Standard Operating Procedure/Design Features/Best Management Practices
Air Quality and Climate Change	The following dust suppression measures shall be implemented during construction to control the production of fugitive dust (particulate matter 10 microns in size [PM_{10}]) and prevent wind erosion of bare and stockpiled soils: ▪ Exposed soil shall be sprayed with water or other suppressant twice a day or as needed to suppress dust. ▪ Non-toxic chemical or organic dust suppressants shall be used on unpaved roads and traffic areas. ▪ Dust emissions during transport of fill material or soil shall be minimized by wetting down loads, ensuring adequate freeboard (space from the top of the material to the top of the truck bed) on trucks, cleaning the interior of cargo compartments on emptied haul trucks before leaving a site, and/or covering loads. ▪ Spills of transported material on public roads shall be promptly cleaned. ▪ Traffic speeds on the Project Site shall be restricted to 15 miles per hour to reduce soil disturbance. ▪ Construction entrances and exits shall be stabilized so as to remove soil that would otherwise be carried offsite by vehicles to decrease deposition of soil on area roadways. ▪ Dirt, gravel, and debris piles shall be covered as needed to reduce dust and wind-blown debris.

	The following measures shall be implemented to reduce emissions of criteria air pollutants (CAP), greenhouse gases (GHG), and diesel particulate matter (DPM) from construction: ▪ All diesel-powered equipment shall be properly maintained, and idling time shall be minimized to five minutes when construction equipment is not in use, unless per engine manufacturer's specifications or for safety reasons more time is required. Since these emissions would be generated primarily by construction equipment, machinery engines shall be kept in good mechanical condition to minimize exhaust emissions. Periodic and unscheduled inspections shall be employed to accomplish the above measures. ▪ All construction equipment with a horsepower rating of greater than 50 shall be equipped with diesel particulate filters, which would reduce approximately 85% of DPM. ▪ The use of low reactive organic gases (150 grams per liter or less) shall be required for architectural coatings to the extent practicable. ▪ Environmentally preferable materials, including recycled materials, shall be used to the extent readily available and economically practicable for construction of facilities. Emissions of CAPs and GHGs during operation of the Project shall be reduced through the following actions: ▪ Electric vehicle charging infrastructure shall be incorporated into the design of the Project, consistent with current California Green Building Code (CalGreen) standards. ▪ Water consumption shall be reduced through low-flow appliances, drought resistant landscaping, and the incorporation of "Save Water" signs near water faucets to the extent feasible. ▪ All diesel-powered vehicles and equipment shall be properly maintained. Idling times shall be minimized to five minutes at loading docks unless per engine manufacturer's specifications or for safety reasons more time is required. ▪ Energy efficient lighting and appliances shall be used to the extent feasible consistent with current CalGreen standards. ▪ Electric boilers and appliances in lieu of natural gas or propane units shall be used to the extent feasible. ▪ Outdoor recycling bins shall be available throughout the campus, particularly near proposed parking areas to the greatest extent feasible.
Cultural Resources	Any cultural resources located within the Project Site boundary shall be protected with orange construction fencing under the supervision of a Sycuan Tribal monitor. The fencing shall remain in place during the duration of construction activities.
Hazardous Materials	Personnel shall follow BMPs for filling and servicing construction equipment and vehicles. BMPs that are designed to reduce the potential for incidents/spills involving the hazardous materials include the following: ▪ Catch-pans shall be placed under equipment to catch potential spills during servicing. ▪ Refueling shall be conducted only with approved pumps, hoses, and nozzles. ▪ All disconnected hoses shall be placed in containers to collect residual fuel from the hose. ▪ Vehicle engines shall be shut down during refueling. ▪ No smoking, open flames, or welding shall be allowed in refueling or service areas. ▪ Refueling shall be performed away from bodies of water to prevent contamination of water in the event of a leak or spill.

	▪ Service trucks shall be provided with fire extinguishers and spill containment equipment, such as absorbents. ▪ All containers used to store hazardous materials shall be inspected at least once per week for signs of leaking or failure. In the event that contaminated soil and/or groundwater is encountered during construction-related earth-moving activities, all work shall be halted until a professional hazardous materials specialist or other qualified individual assesses the extent of contamination. Contaminated soils shall be reported and disposed of in accordance with federal regulations.
Geology and Soils and Hydrology	The Project shall submit a Notice of Intent to comply with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit from the USEPA to address runoff on the Project Site during construction. In compliance with the Clean Water Act (CWA), a Stormwater Pollution Prevention Plan (SWPPP) shall be prepared, implemented, and maintained throughout construction, consistent with General Construction Permit requirements. The SWPPP shall include, but would not be limited to, the following BMPs to minimize storm water effects to water quality during construction: ▪ To the extent feasible, grading activities shall be limited to the immediate area required for construction. ▪ Loose aggregate chunks and dust will be swept or shoveled and collected (not hosed down a storm drain) for recycling or proper disposal. ▪ To minimize dust generation during construction, soil will be wetted down with water prior to ground disturbance. ▪ Temporary erosion control measures (such as silt fences, fiber rolls, wattles, and vegetated swales) shall be implemented for disturbed areas. Existing catch basins will have inlet protection measures installed to provide secondary protection from runoff. ▪ Construction activities shall be scheduled to minimize land disturbance during peak runoff periods. ▪ Disturbed areas shall be paved or re-vegetated following construction activities. ▪ Construction area entrances and exits shall be stabilized. ▪ A spill prevention and countermeasure plan shall be developed which identifies proper storage, collection, and disposal measures for potential pollutants (such as fuel, fertilizers, pesticides, etc.) used onsite. ▪ Petroleum products shall be stored, handled, used, and disposed of properly in accordance with provisions of the CWA (33 USC §§ 1251 to 1387). ▪ Construction materials, including topsoil and chemicals, shall be stored, covered, and isolated to prevent runoff losses and contamination of surface and groundwater. ▪ Fuel and vehicle maintenance areas shall be established away from all drainage courses and designed to control runoff. ▪ Sanitary facilities shall be provided for construction workers. ▪ Disposal facilities shall be provided for soil waste, including excess asphalt during construction. ▪ Solid waste storage containers will be stored in a roofed enclosure and located in a paved area so that runoff cannot come into contact with the waste storage containers. ▪ Sweeping of paved surfaces shall be employed to remove tracked soil. Operational BMPs related to stormwater would include the following: ▪ Efficient irrigation systems and landscape design shall be implemented for source control.

	▪ Stormwater conveyance systems will incorporate stamping and signage with pollution-prevention messaging. ▪ Trash storage areas shall be designed to reduce pollution. Trash storage areas shall be paved with an impervious surface designed to prevent run-on from adjoining areas. Trash storage areas shall be screened or enclosed to prevent off-site transport of trash. All trash containers shall include attached lids to prevent rainfall intrusion.
Noise	▪ Outdoor construction activities shall generally be limited to daytime hours between 7 am and 7 pm to the extent feasible. ▪ Power equipment shall comply with applicable federal regulations and such equipment will be fitted with adequate mufflers according to the manufacturer's specifications to minimize construction noise effects. ▪ New heating, ventilation, and air conditioning equipment shall be shielded to reduce noise.
Public Services	The following BMPs shall be implemented during construction: ▪ Construction equipment shall use spark arrestors, as provided by the manufacturer. ▪ Staging areas, welding areas, or areas slated for development using spark-producing equipment shall be cleared of dried vegetation or other materials that could serve as fire fuel. ▪ The Utility Notification Center shall be contacted to notify the utility service providers of excavation at the work site. In response, the utility service providers shall mark or stake the horizontal path of underground utilities, provide information about the utilities, and/or give clearance to dig. ▪ The Project Site shall be cleaned daily of trash and debris to the maximum extent practicable.

2.11 OFF-SITE IMPROVEMENTS

The following sections describes improvements related to or in the vicinity of the Project. These improvements are located outside of the Project Site, which is defined as the lease area boundary.

2.11.1 Off-Site Water and Wastewater Infrastructure Improvements (Part of Project)

A portion of proposed water and wastewater infrastructure would be located outside of the Project Site in previously disturbed areas of the Singing Hills Golf Resort and Willow Glen Drive right-of-way as shown in **Appendix C**. Off-site infrastructure improvements would be sized accordingly and would undergo coordination with the Otay Water District.

The Project's potable water and fire flow systems would include a connection to an existing 12-inch public water line in Willow Glen Drive. The fire flow system would also include a connection along the eastern Project boundary which would travel south to an existing 16-inch water line in the area of the relocated driving range.

A new private sewer lift station would collect wastewater from the Project Site and would be located just south of the Project Site in the area of the relocated driving range. From the lift station, wastewater would be conveyed south to an existing public sewer line on the Reservation.

2.11.2 Off-Site Drainage Improvements (Part of Project)

Off-site drainage improvements have been designed to address 100-year stormwater flows and are shown in **Appendix A-1**. A stormwater treatment BMP in the area of the relocated driving range would be developed to treat flows and a detention basin south of the Project Site would be developed to reduce peak flows from stormwater. The proposed detention basin connects to an existing 48-foot reinforced concrete pipe storm drain to the south.

A small berm, approximately 700 feet south of the Project Site will be built up to improve detention during large-storm events in existing low-lying areas of the Singing Hills Golf Resort. The berm would require placement of approximate 12-18 inches of fill in an area which has been previously disturbed with an existing golf cart path.

2.11.3 Traffic Improvements (Project Mitigation)

Based on the traffic impact analysis for the Project, off-site traffic improvements are identified as mitigation in **Table 4-1**. Recommended improvements include restriping on Dehesa Road and Willow Glen Drive. Restriping on Dehesa Road as shown on Figure 8-2 of **Appendix F** would improve access to the main Project entrance, which is an existing driveway that is typically closed to traffic. Restriping on Willow Glen Drive would facilitate access to a new service driveway as shown on Figure 8-1 of **Appendix F**). These improvements would not involve ground disturbance and, if implemented, would be completed in consultation with and to the standards of San Diego County.

2.11.4 Driving Range Relocation (Not a Part of the Project)

The existing driving range will be relocated to the south of its current location. The anticipated location is shown on **Figure 2.1-1**, which is a previously disturbed area within the Singing Hills Golf Resort. It is important to note that the driving range will be outside of the Project Site and cover an approximate area of 4 acres. The relocation of the driving range would be a separate Tribal Project and thus is not subject to the HEARTH Act process; however, it would be carried out in compliance with Tribal and federal regulations.

Section 3 | Environmental Setting and Impact Analysis

3.1 INTRODUCTION

3.1.1 Scope of the Environmental Impact Analysis

In accordance with the Tribe's HEARTH Act Regulations, **Section 3** of this TEIR describes the existing environmental setting of the area affected by the Project as well as all potentially significant short-term and long-term environmental impacts of the Project. Resource areas or issues that are addressed in this section include the following:

3.2 Aesthetics
3.3 Air Quality
3.4 Biological Resources
3.5 Cultural and Paleontological Resources
3.6 Geology and Soils
3.7 Hazards and Hazardous Materials
3.8 Hydrology
3.9 Land Use
3.10 Noise
3.11 Public Services
3.12 Transportation and Circulation

Impacts related to proposed off-site improvements (outside of the proposed lease boundary) and mitigation are summarized in **Section 3.13**. Measures to mitigate for any potentially significant environmental impacts are presented in **Table 4-1**.

3.1.2 Determination of Significance

The determination of significance is based on whether the Project would result in a substantial, adverse change in the physical conditions of the environment. In some cases, the determination of significance is guided by consistency with applicable federal and Tribal environmental regulations and plans. In other cases, the significance of an impact is judged in light of the environmental setting or other factors.

3.1.3 Environmental Categories with No Significant Impacts

The Tribe has determined that there would be no significant off-Reservation impacts associated with the following categories of environmental issues. These environmental categories are not discussed further in this TEIR.

Population and Housing

The Project would directly employ approximately 60 professional and academy staff. The increase in permanent jobs is expected to be filled by the existing labor force. In 2023, the labor force in San Diego County was estimated to be around 1,592,300, of which 63,200 persons were unemployed (EDD, 2023). Within the context of the regional labor force, the additional jobs are not expected to induce population growth in the area. No people or housing would be displaced as the result of the Project.

Recreation

The existing Pine Glen Golf Course is a commercially operated golf course on Tribal trust land that provides recreational opportunities for local residents. Under the Project, portions of the Pine Glen Golf Course would be converted to a soccer training facility. There are multiple other commercially-operated golf courses in the region, including the Oak Glen and Willow Glen golf courses within the Singing Hills Golf Resort operated by the Tribe, which will be available to offset the conversion of the Pine Glen Golf Course. Further, as discussed above, the Project is not expected to result in substantial unplanned population growth in the area. Accordingly, the Project would not directly or indirectly increase the use of public parks or other public recreational facilities in the region.

3.2 AESTHETICS

3.2.1 Regulatory Setting

Natural and built visual elements on the Project Site and larger Reservation are regulated by the Tribe, including protection of natural elements through the Tribe's Natural and Cultural Resources Management Plan (for detail see **Section 3.4**). To provide context, State, and local policies applicable to off-Reservation areas only are presented below.

State and Local

California Scenic Highway Program

In 1963, the California State Legislature established the California Scenic Highway Program through Senate Bills 1467 and 1468, provisions of which were added to the Streets and Highways Code. The goal of the California Scenic Highway Program is to preserve and enhance the natural beauty of California, with scenic highways being designated based upon the amount of natural landscape visible to a passing motorist. Scenic highway designation does not preclude nearby development; however, the program encourages development that does not degrade the scenic value of the highway corridor. The nearest identified resources to the Project Site include Interstate 8 and State Route (SR) 94 which are considered eligible for State designation and SR-125 which is officially designed by the State (Caltrans, 2023). Due to distance, elevation, and visual obstructions (hills and existing structures), the Project Site is not visible from these roadways and thus these scenic corridors are not discussed further.

County of San Diego General Plan

Land use planning for off-Reservation land in the vicinity of the Project Site is guided by the County of San Diego General Plan and the Crest/Dehesa/Harbison Canyon/Granite Hills Community Plan (Community Plan). The Conservation and Open Space Element (COSE) of the County's General Plan identifies three distinctive geographic regions, listed from west to east: (1) the low-lying coastal plain, (2) the mountainous Peninsular Range, and (3) the desert Salton (Imperial) Basin. The Project Site is situated in the foothills of the Peninsular Range.

The COSE addresses both County designated and State designated scenic corridors. For County designated segments, the General Plan states that a "scenic highway" can pertain to any freeway, highway, road, or other vehicular right-of-way along a corridor with considerable or otherwise scenic landscape." For State Scenic Highways, highways that are officially designated as scenic or eligible for designation are considered "Scenic Highways" by the County (see subheading *California Scenic Highway Program*, above). Dehesa Road is designated within the County General Plan as a County Scenic Highway and views of the Project from Dehesa Road are addressed in this section of the TEIR.

The astronomical dark sky discussion lists two sites within the County that meet five criteria for high-quality observatory locations: (1) Palomar and (2) Mount Laguna Observatories. Palomar Observatory is located at an altitude of 5,500 feet at the top of Palomar Mountain, approximately 37 miles north of the Project Site in northern San Diego County near Palomar Mountain State Park. The Mount Laguna Observatory is located at an altitude of 6,100 feet on the eastern edge of the Cleveland National Forest approximately 27 miles east of the Project Site near the Anza-Borrego State Park, 45 miles east of downtown San Diego. At these distances the Project Site and immediate vicinity are not anticipated to affect observatory astronomical views and this issue is not discussed further.

Crest/Dehesa/Harbison Canyon/Granite Hills Community Plan (Community Plan)

The Project Site is adjacent to the Crest/Dehesa/Harbison Canyon/Granite Hills Community Planning Area. The Community Plan guides off-Reservation development in the area of the Project Site. Appendix A of the Community Plan identifies Resource Conservation Areas "requiring special attention to conserve resources in a manner best satisfying public and private objectives." Appropriate implementation actions identified by the County include the establishment of such measures as scenic or natural resource preservation overlay zones. Resource conservation areas include groundwater problem areas, coastal wetlands, native wildlife habitats, construction quality sand areas, littoral sand areas, astronomical dark sky areas, unique geological formations, and significant archaeological and historical sites.

The resource conservation area in the vicinity of the Project Site as defined by the Community Plan includes "McGinty Mountain, [Sycuan] Creek, Japatul Road, Loveland Drainage, Loveland Reservoir". This resource conservation area contains most of the Sweetwater River that flows through the Subregion, as well as the three prominent peaks that are visible from within and outside the Subregion: Dehesa Mountain, McGinty Mountain and Mount Sycuan. These mountains also are biologically important because they contain many rare, endangered, and threatened plants. In addition, the Sweetwater River and its important riparian habitats support a large number of stream dependent wildlife species, including many sensitive species.

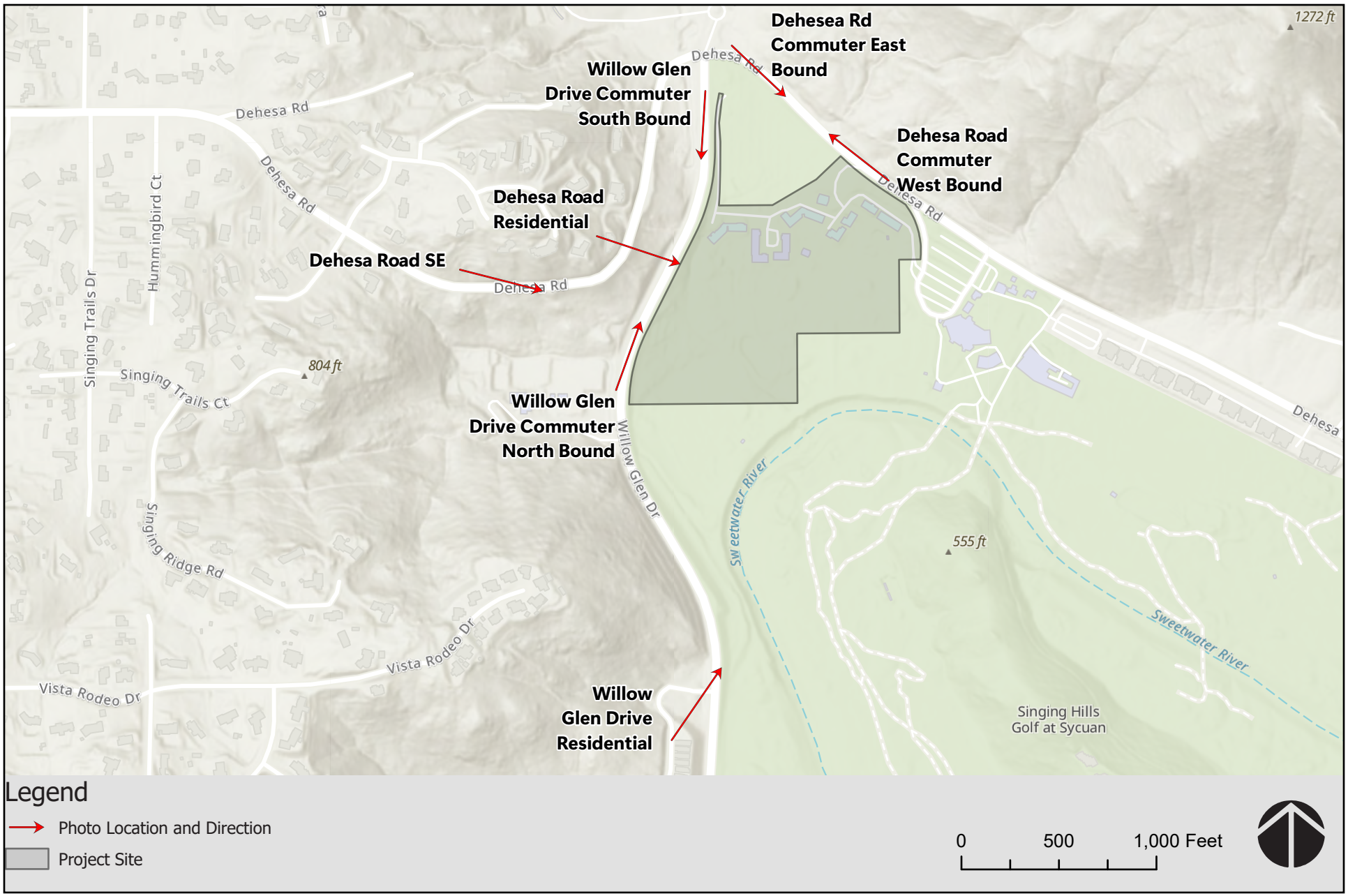
San Diego County Dark Sky Ordinance

The San Diego County Dark Sky Ordinance or Light Pollution Code, codified as Section 51.201 of the County Code of Regulatory Ordinances, provides lighting regulations in off-Reservation areas of the County for the purposes of minimizing light pollution to allow citizens of the County to view and enjoy the night environment and protecting the Palomar and Mount Laguna observatories from the detrimental effect that light pollution has on astronomical research.

3.2.2 Environmental Setting

The Project Site is located in southwestern San Diego County approximately 17 miles east of downtown San Diego. The Project Site is in a valley surrounded by moderately steep slopes. The viewshed is mainly influenced by topography and surrounding land uses that shape local viewing corridors to and from the Project Site. The visual character of the site is commercial and recreational in nature, including a multi-story hotel, parking areas and golf course with varying topography and irrigated greens interspersed with mature trees and a pond. Surrounding land uses are largely rural and rural-residential in nature. Undeveloped lands immediately to the north, east, and south surround the Singing Hills Golf Resort. Approximately two miles west of the Project Site is the town center of El Cajon. Land uses between the town center and the Project Site consist of housing and small businesses.

Representative off-Reservation views of the Project Site and an overview map are provided as **Figures 3.2-1** through **3.2-8**. As illustrated in these figures, there are five primary viewing corridors of the Project Site as experienced by off-Reservation sensitive receptors, or vistas. Vista A is a commuter vista that includes the line-of-sight between the Project Site and the portion of Dehesa Road north of the Project Site. Vista B and Vista C are residential vistas that that include the line-of-sight between the Project Site and the residences along Dehesa Road and Willow Glen Drive. Vista D is a commuter vista that includes the line-of-sight between the Project Site and the portion of Willow Glen Drive west of the Project Site. Because of steep hills of the McGinty Mountain Ecological Reserve, there are no nearby roads or residences in off-Reservation areas to the southeast with direct views of the site.



Google Earth, Esri Community Maps Contributors, SanGIS, California State Parks

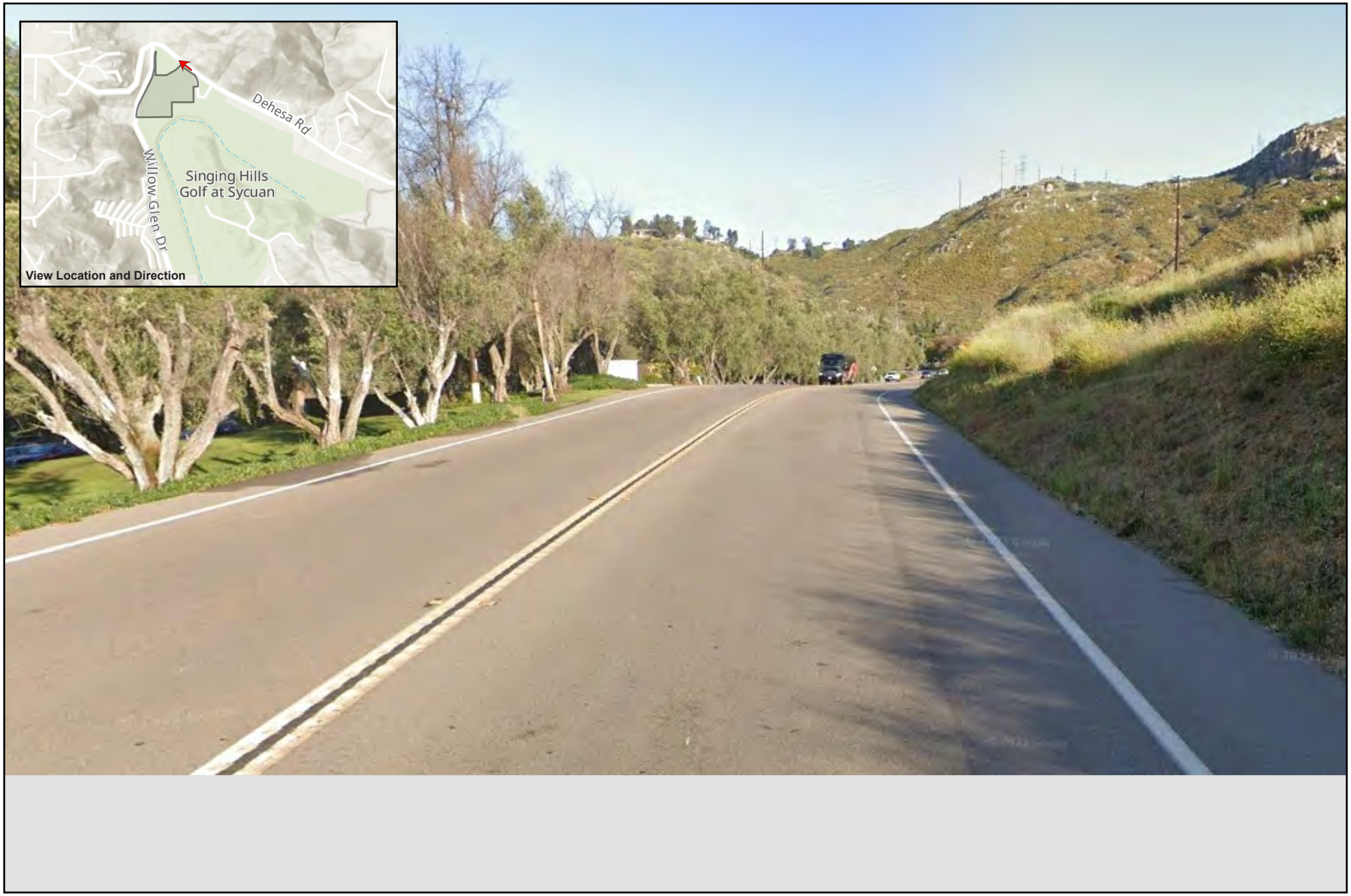
FIGURE 3.2-1

REPRESENTATIVE VIEWSHED MAP

Google Earth, Esri, NASA, NGA, USGS, FEMA, SanGIS, California State Parks, Esri, HERE,

FIGURE 3.2-2

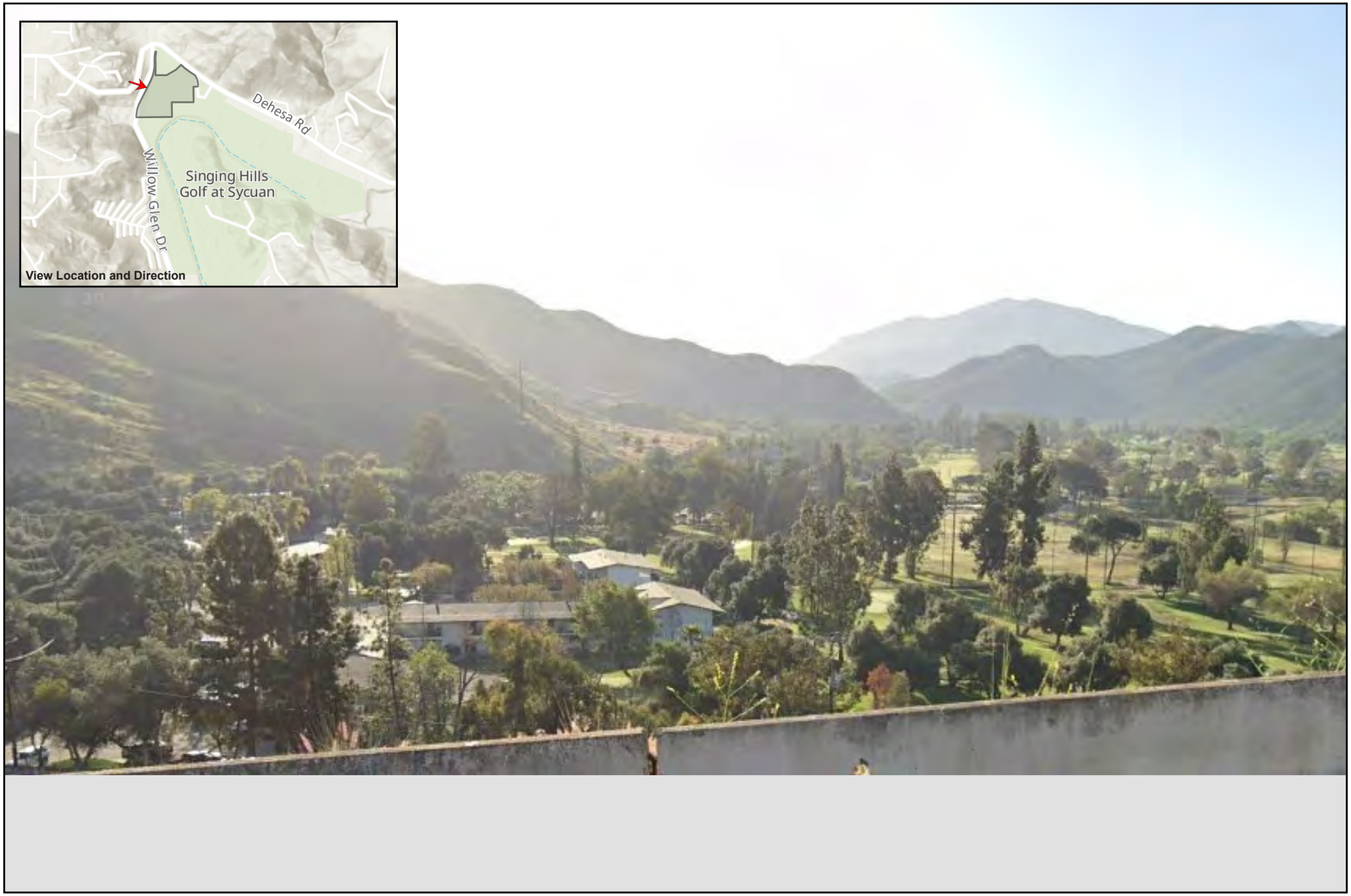
DEHESA RD COMMUTER EAST BOUND



Google Earth, Esri, NASA, NGA, USGS, FEMA, SanGIS, California State Parks, Esri, HERE,

FIGURE 3.2-3

DEHESA RD COMMUTER WEST BOUND



Google Earth, Esri, NASA, NGA, USGS, FEMA, SanGIS, California State Parks, Esri, HERE,

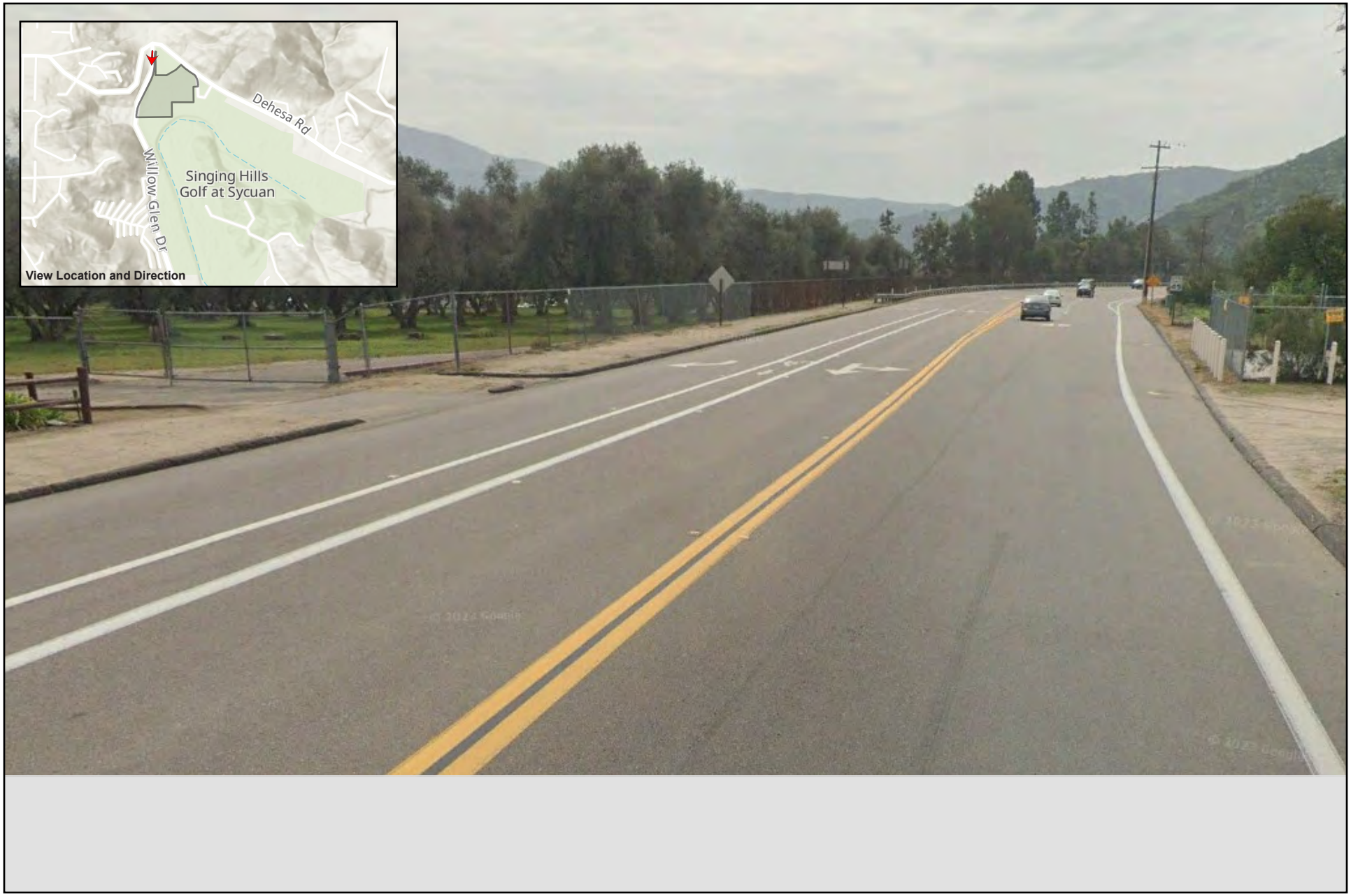
FIGURE 3.2-4

DEHESA RD RESIDENTIAL

Google Earth, Esri, NASA, NGA, USGS, FEMA, SanGIS, California State Parks, Esri, HERE,

FIGURE 3.2-5

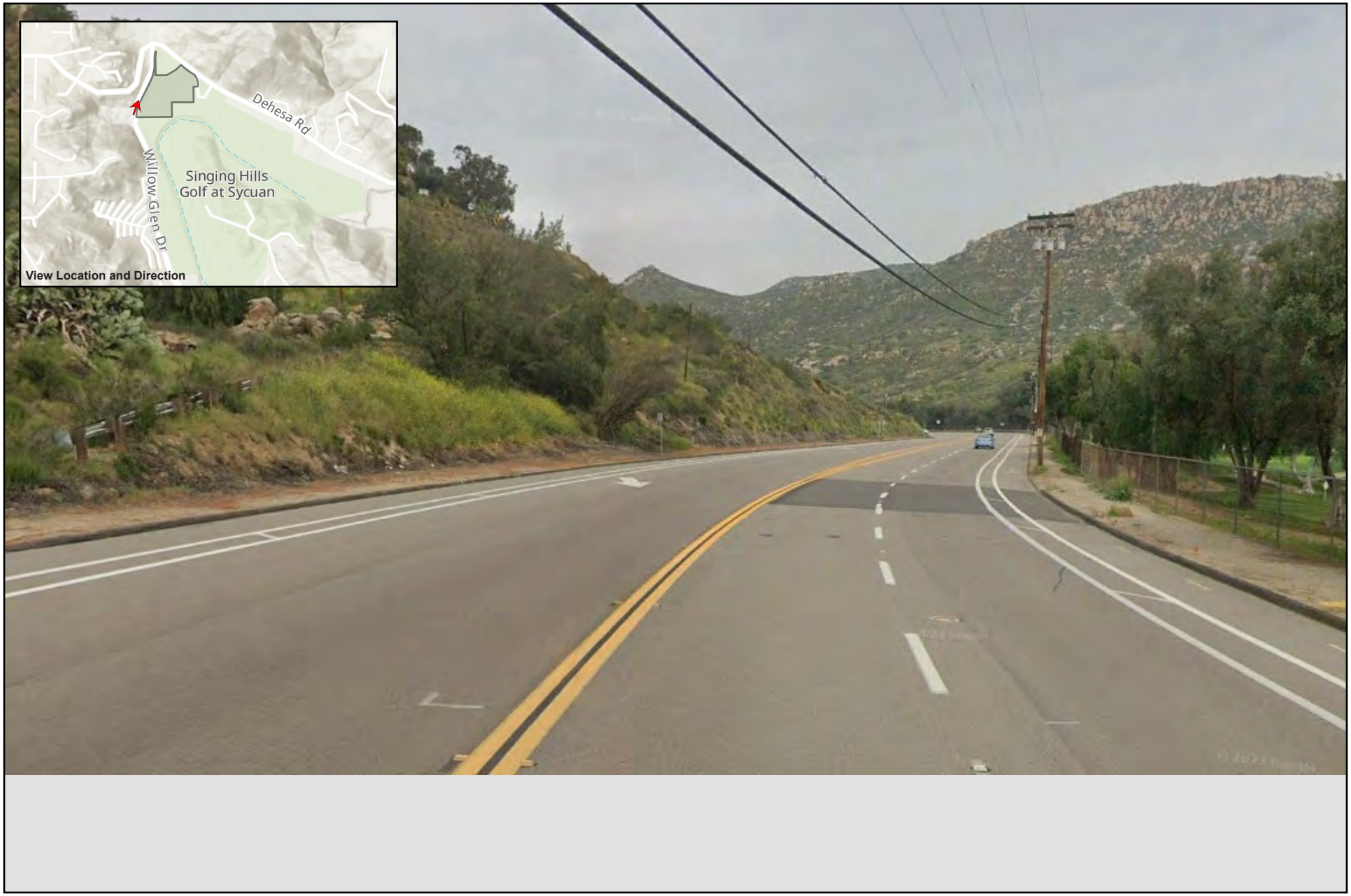
WILLOW GLEN DRIVE RESIDENTIAL



Google Earth, Esri, NASA, NGA, USGS, FEMA, SanGIS, California State Parks, Esri, HERE,

FIGURE 3.2-6

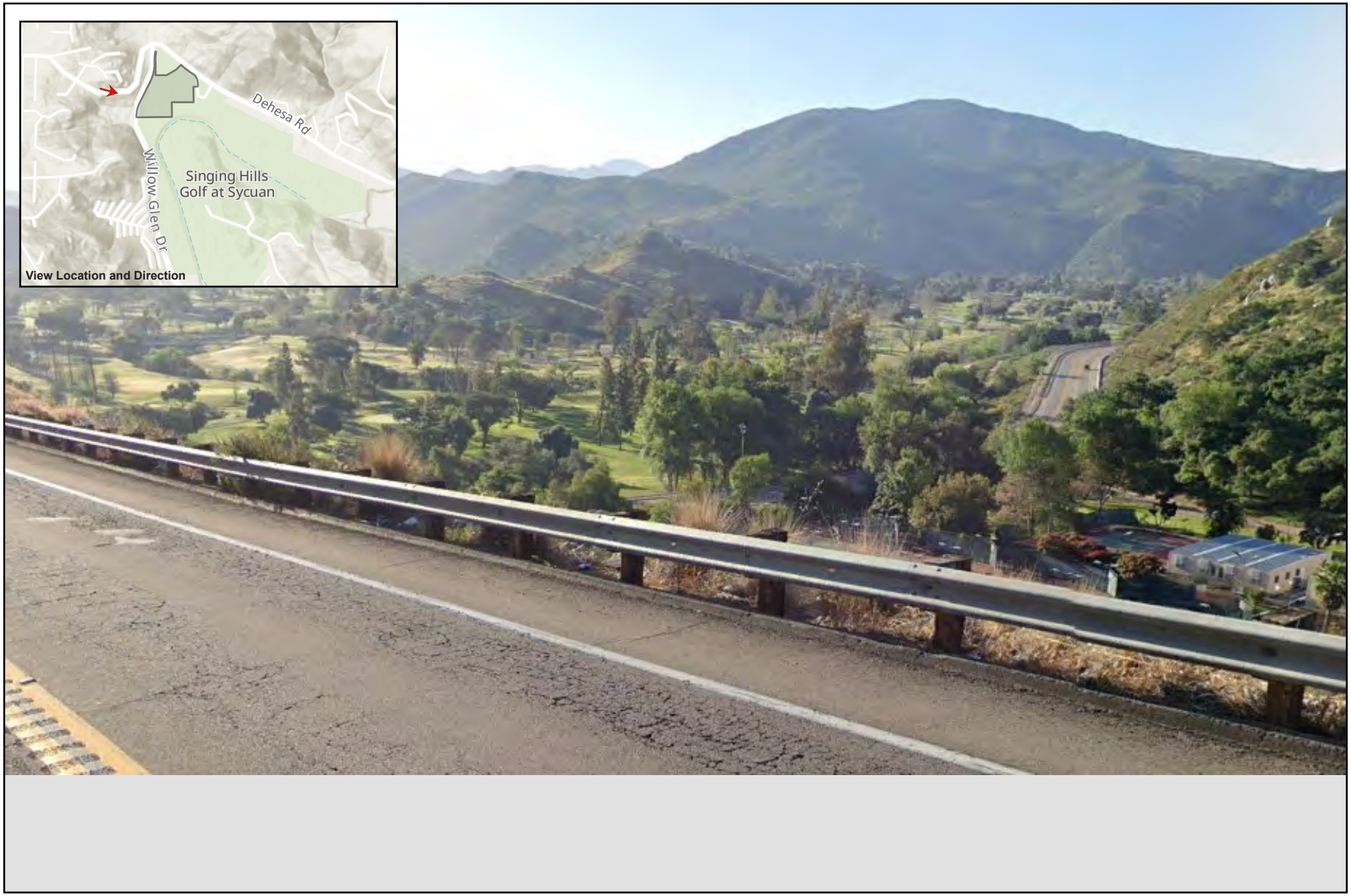
WILLOW GLEN DR SOUTH BOUND



Google Earth, Esri, NASA, NGA, USGS, FEMA, SanGIS, California State Parks, Esri, HERE,

FIGURE 3.2-7

WILLOW GLEN DR COMMUTER NORTH BOUND



Google Earth, Esri, NASA, NGA, USGS, FEMA, SanGIS, California State Parks, Esri, HERE,

FIGURE 3.2-8

DEHESA ROAD SOUTH EAST

Topography is the most influential characteristic of the regional viewshed, and its role in delineating the vistas introduced here is explained in detailed discussion of each vista, below.

Vista A – Dehesa Road Commuter Viewshed (East of Willow Glen Drive)

As illustrated in **Figure 3.2-2** and **3.2-3**, commuters traveling eastbound and westbound on Dehesa Road (east of Willow Glen Drive) experience views of the orchard north of the Project Site and do not experience direct views of the Project Site. Although views are fairly uninterrupted by visual obstacles, views are limited by the high travel speeds of the motorists as the speed limit is 50 miles per hour (mph).

Vista B – Dehesa Road Residential and Commuter Viewshed (West of Willow Glen Drive)

As illustrated in **Figure 3.2-4**, public views of the Project Site occur from a few hilltop residences 300 feet west of the Project Site. These residences experience permanent views of the Project Site, and the Project Site appears downgrade and against a backdrop that includes mountainous terrain. Residences experience views of the valley floor developed with the existing Singing Hills Hotel and Golf Resort, including multi-story buildings, landscaping, irrigated greens interspersed with mature trees, and tall fencing associated with the driving range, as well as riparian vegetation along the Sweet Water River.

As shown in **Figure 3.2-8**, similar views are experienced briefly by eastbound commuters on Dehesa Road (west of Willow Glen Drive) as the road sharply curves northward, but views are limited by the high travel speeds of the motorists as the speed limit is 50 mph. Views from a few hilltop residences on Vista Rodeo Drive, 1,000 feet to the southwest of the Project Site, have similar views but from a further distance.

Vista C – Willow Glen Drive Residential Viewshed

As illustrated in **Figure 3.2-5**, public views of the Project Site occur from a few residences along Willow Glen Drive, north of West Village Drive. Permanent views of the Project Site would occur from residential backyards, and thus viewsheds are private and not available for illustration. Therefore, **Figure 3.2-5** illustrates the viewshed from Willow Glen Drive just east of this neighborhood which is a public street; however, the neighborhood is situated on a hill and likely experiences views of the Project Site that are broader than illustrated by **Figure 3.2-5** and are more similar to those described in Vista B in which the Project Site appears against a backdrop that includes mountainous terrain. Residences experience views that are recreational in nature and partially screened by trees.

Vista D – Willow Glen Drive Commuter Viewshed

As illustrated in **Figure 3.2-6,** traveling southbound on Willow Glen Drive, the Project side is located on the commuter's left side but is obscured by an existing orchard north of the Project Site. As illustrated in **Figure 3.2-7**, commuters traveling northbound on Willow Glen Drive experience views of the Project Site. Traveling northbound on Willow Glen Drive, the Project Site is out of forward-oriented view at the commuter's right side. Views are partially screened by trees on the western boundary of the Project Site and limited by the high travel speeds of the motorists as the speed limit is 45 mph.

3.2.3 Impacts

Significance Criteria

The Project would have a potential impact on aesthetic resources if it were to adversely affect a scenic vista or scenic resource, substantially degrade the existing visual character or quality of the site and its surroundings or create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Methodology

The evaluation of potential impacts of the Project to off-Reservation aesthetics distinguishes between impacts related to construction and operation of the Project. Construction impacts would be mostly temporary while operation impacts could be permanent. The evaluation of potential impacts on off-Reservation aesthetics consisted of the following:

- Field observation;
- Photographic documentation;
- Review of site plans and renderings; and
- Analysis of regulations that apply to off-Reservation aesthetic resources.

Scenic Vista

Construction

Construction of the Project would temporarily alter views of the Project Site from off-Reservation locations. Heavy machinery and construction activities, including exposed dirt and soil stockpiles, would be visible from off-Reservation locations and to passing motorists on adjacent roadways, though an existing orchard and retained perimeter trees along the western project boundary would partially screen motorist views. Visibility of construction activities from the off-Reservation locations would be temporary in nature and would not permanently degrade existing visual characteristics. Construction activities would not permanently obstruct any off-Reservation scenic vistas, and visual impacts occurring from construction of the Project would be temporary and less than significant.

Operation

The Project would introduce new visual components to the Project Site that would impact views from nearby viewsheds, including the proposed 40-foot-tall training facility building, two maintenance buildings, five full-sized soccer fields, ancillary training fields, sports lighting, and fencing. Construction would involve grading and clearing of the existing greens and landscaped areas within Pine Glen Golf Course area of the Project Site, including the removal of approximately 100 trees interior to the site and the pond, and flattening of the current uneven and sloping topography. The existing perimeter vegetation and trees would be maintained to the extent possible to continue to provide privacy, and visual screening, and the existing visual character of the hotel and associated parking areas would remain unchanged. Although the following discussion focuses on the views that will be mostly heavily influenced by the Project due to their proximity and direct line-of-sight, the range of areas from which the Project may be viewed would be broader and would include scattered residences along Willow Glen Drive and Dehesa Road, as well as potential recreational trails throughout the surrounding mountainous terrain.

Views of the Project Site from Vista A and Vista D are primarily obscured by topography and an orchard north of the Project Site or are interrupted by driving speeds. Views of the Project Site for commuters in these vistas would be reduced by the addition of scrim (privacy screen) on the existing chain link fence. The views of the valley floor from Vista B and Vista C would be permanently altered by visual components of the Project, including changes to the site topography and tree removal. However, these residences would continue to experience views typical of recreational land uses. The architectural styles, colors, and materials proposed for the training facility building and maintenance buildings would incorporate natural colors and materials, thereby ensuring a smooth visual transition. Further, the turf sports fields would be visually cohesive with the large expanses of turf within the adjacent golf course and driving range areas of the Singing Hills Golf Resort. Thus, the Project would result in a less-than-significant off-Reservation visual impact to scenic vistas.

Lighting and Glare

Exterior construction of the Project would generally be limited to daylight hours between 7:00 a.m. and 7:00 p.m., as stated in BMP **Table 2.10-1**. As such, significant construction impacts are not anticipated. Operational lighting in the northern portion of the Project Site would be similar to existing conditions as existing hotel buildings with exterior lighting would be repurposed. In the central portion of the Project Site new lighting would be added for safety and security in new circulation areas and for the new training center building. As stated in **Section 2-4,** exterior lighting would be shielded, and strategically positioned to minimize off-site lighting and glare and any direct sight lines to the public. The youth academy training pitches in the eastern portion of the site (furthest from off-Reservation residential areas) will have nighttime sports lighting to accommodate evening practices. As stated in **Section 2.4,** sports lighting of these fields will be shielded, downcast, and directed away from the Sweetwater River. Evening events requiring sports lighting are not expected to regularly go past 10 p.m., as professional players would practice during the day and youth players would have a curfew. Given the commitment to use downcast and shielded lighting, the use of privacy screening along perimeter fencing, and the use of materials to break up glass, the proposed facilities would not create a new substantial source of light or glare and impacts would be less than significant.

3.3 AIR QUALITY

3.3.1 Regulatory Setting

Federal

The Clean Air Act (CAA; 42 USC Chapter 85) is the federal legislation for the protection of air quality. The CAA gives the USEPA authority to regulate air quality by promulgating standards and levels for air quality and enforcing those standards and levels on federal, state, and tribal land. The CAA requires the USEPA to regulate hazardous air pollutants, which are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects.

The Federal CAA of 1970, as amended, establishes air quality standards for several critical air pollutants (CAPs): ozone (O_3), carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are termed "criteria" pollutants because the USEPA has established specific concentration threshold criteria based upon specific medical evidence of health effects or visibility reduction, soiling, nuisance, and other forms of damage.

The USEPA is responsible for implementing and enforcing the CAA. As part of its implementation responsibilities, the USEPA requires each state to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain and/or maintain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. USEPA responsibilities under the CAA include regulating mobile sources, such as cars, trucks, buses, and planes. The provisions of Title II of the CAA have resulted in tailpipe emission standards for vehicles, which have generally strengthened over time to improve air quality.

State

The California Air Resources Board (CARB) is the state agency responsible for coordinating both state and federal air pollution control programs in California. It is primarily responsible for ensuring implementation of the 1988 California Clean Air Act (CCAA), for responding to the federal CAA requirements, and for regulating emissions from motor vehicles and consumer products within the state. CCAA requirements include annual emission reductions, development and use of low emission vehicles, establishment of the California Ambient Air Quality Standards (CAAQS), and submittal of air quality attainment plans by air districts for incorporation into the California State Implementation Plan (SIP). The CCAA and other California air quality statutes invest local air districts, such as the San Diego County Air Pollution Control District (APCD), with the responsibility for regulating most stationary sources and, to a certain extent, area sources.

The Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32) is the overarching law that requires the State to set statewide greenhouse gas (GHG) reduction targets. AB 32 required CARB to develop a Climate Change Scoping Plan that describes the approach California will take to reduce GHGs to achieve emission reduction goals, and to update the plan every five years. CARB approved the first Scoping Plan in 2008, and the most recent update was approved by CARB in 2022. In 2016, the Legislature passed Senate Bill (SB) 32. This established a benchmark for California to reduce GHG emissions to 40 percent below 1990 levels by 2030. Under the 2022 Scoping Plan, the seven key areas were identified: transportation

sustainability, clean electricity grid, sustainable manufacturing and buildings, carbon dioxide removal and capture, short-lived climate pollutants (non-combustion gases), and natural and working lands.

Local

The CCAA designates air districts as lead air quality planning agencies and requires air districts to prepare air quality plans. The CCAA also emphasizes the control of indirect and area-wide sources of air pollutant emissions. The CCAA gives local air pollution control districts explicit authority to regulate indirect sources of air pollution and to establish traffic control measures.

In San Diego County, the APCD is the regional agency responsible for the administration of federal and state air quality laws, regulations, and policies. Included in the APCD's tasks are monitoring of air pollution, preparation of the Regional Air Quality Strategy (RAQS) for the San Diego Air Basin, and promulgation of rules and regulations.

The San Diego County APCD develops and adopts rules to regulate sources of air pollution in San Diego County including those described below.

> **Rule 51 – Nuisance:** Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or tend to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property.
>
> **Rule 55 – Fugitive Dust:** Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a Project Site.
>
> **Rule 67.0.1 – Architectural Coatings:** Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce volatile organic compounds (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
>
> **Rule 67.7 – Cutback and Emulsified Asphalts:** Requires manufacturers, distributors, and end users of cutback and emulsified asphalt materials for the paving, construction, or maintenance of parking lots, driveways, streets, and highways to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC evaporation content.

3.3.2 Environmental Setting

Climate and Meteorology

The Project Site is located in the San Diego Air Basin (SDAB), which is coincident with San Diego County. The climate of San Diego County is characterized by warm, dry summers and mild, wet winters. One of the main determinants of the climatology is a semi-permanent high-pressure area (the Pacific High) in the eastern Pacific Ocean. In the summer, this pressure center is located well to the north, causing storm tracks to be directed north of California. This high-pressure cell maintains clear skies for much of the year. When the Pacific High moves southward during the winter, this pattern changes, and low-pressure storms are brought into the region, causing widespread precipitation.

In San Diego County, the months of heaviest precipitation are November through April, averaging about 14 inches annually. The mean temperature is 65.2°F, and the mean maximum and mean minimum temperatures are 77.3°F and 53.0°F, respectively (NCEI, 2023).

Basin Air Quality

Specific geographic areas are classified as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with federal and state standards. If an area is redesignated from nonattainment to attainment, the CAA requires a maintenance plan to demonstrate how the air quality standard will be maintained for at least 10 years. The Project Site is located in the SDAB, which currently meets the federal standards for all criteria pollutants except ozone (USEPA, 2023a). The SDAB is a CO attainment-maintenance area following a 1998 redesignation as a CO attainment area. The SDAB currently meets state standards for all criteria pollutants except O_3, PM_{10}, and $PM_{2.5}$. The SDAB is currently classified as a state nonattainment area for O_3, $PM_{2.5}$ and PM_{10} (CARB, 2022). **Table 3.3-1** shows the federal and state attainment status criteria pollutants for the SDAB.

Table 3.3-1: San Diego Air Basin Attainment Status

Criteria Pollutant	Federal Attainment Status	State Attainment Status
Ozone (O_3) 1-hour	No federal standard	Nonattainment
Ozone (O_3) 8-hour	Nonattainment (Severe 15)	Nonattainment
Nitrogen Dioxide (NO_2)	Attainment – Unclassified	Attainment
Carbon Monoxide (CO)	Attainment – Maintenance	Attainment
Particulate Matter (PM_{10})	Attainment – Unclassified	Nonattainment
Particulate Matter ($PM_{2.5}$)	Attainment – Unclassified	Nonattainment

Source: USEPA, 2023a; CARB, 2022.

Hazardous Air Pollutants

Hazardous air pollutants (HAPs) are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. HAPs are also known as toxic air pollutants or air toxics (USEPA, 2022). The State of California uses the terminology "toxic air contaminants," and under section 39655 of the California Health and Safety Code, toxic air contaminants are defined as "an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health." The USEPA has listed 188 HAPs that are considered detrimental to the environment (USEPA, 2022).

Greenhouse Gases

Certain gases in Earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining Earth's surface temperature. Carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6) are the principal GHGs. When concentrations of these gases exceed historical concentrations in the atmosphere, the greenhouse effect is intensified. CO_2, CH_4, and N_2O occur naturally and are also generated through human activity. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing, natural gas leaks from pipelines and

industrial processes and incomplete combustion associated with agricultural practices, landfills, energy providers and other industrial facilities. Other human-generated GHGs include fluorinated gases such as SFCs, PFCs, and SF_6, which have much higher heat-absorption potential than CO_2 and are byproducts of certain industrial processes. GHGs are typically quantified in terms of "carbon dioxide equivalent" (CO_2e), a common measure used to compare the emissions of various greenhouse gases based on their global warming potential. This measure is usually presented in metric tons and is expressed as $MTCO_2e$.

Sensitive Receptors

Sensitive receptors are generally defined as land uses that house or attract people who are susceptible to adverse effects from air pollution emissions and, as such, should be given special consideration when evaluating air quality impacts from projects. Sensitive receptors include facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent homes, parks and recreational facilities, and residential areas are examples of sensitive receptors.

Sensitive receptors in the project vicinity include off-Reservation single family homes that are approximately 375 feet west of the Project Site, on-Reservation condominiums approximately 1,000 feet east of the Project Site, on-Reservation golf course facilities within and adjacent to the Project Site, and the Willow Glen Golf Course approximately 250 feet south of the Project Site.

3.3.3 Impacts

Significance Criteria

Development and operation of the Project would emit criteria air pollutants, hazardous air pollutants, and greenhouse gases. This section presents the methodology used to assess the affected environment and to evaluate the potential air quality effects of the Project. To assess the significance, project emissions are compared to federal and local thresholds.

The federal Clean Air Act includes conformity regulations that apply to federal actions that would cause emissions of CAPs in locations designated as federal nonattainment or maintenance areas for the emitted pollutants. As discussed in **Section 3.3.2**, the Project Site is in an area that is classified as being in attainment for all NAAQS except for ozone. The Project Site is in a maintenance area for CO. While there are no federal actions required for development of the Project, the *de minimis* levels identified in the federal conformity regulations are used as significant thresholds in this analysis. Likewise, while local regulations do not apply to tribal trust lands, project emissions are also compared against the Screening-Level Thresholds identified in the *County of San Diego Guidelines for Determining Significance Air Quality* (San Diego County, 2007).

Methodology

Construction Analysis

Construction of the Project would result in the temporary generation of emissions resulting from excavation, grading, material hauling, and worker trips. Fugitive dust, the dominant source of PM_{10} and $PM_{2.5}$ emissions, is generated when vehicles and equipment disturb soil and other friable materials. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. Off-road construction equipment is often diesel-powered and can be a substantial

source of NOx emissions, in addition to diesel particulate matter (DPM) emissions. Worker commute trips and asphalt paving are dominant sources of ROG emissions. Such air quality effects generally would be temporary and localized.

Emissions from construction trucks and heavy equipment were calculated using the USEPA-approved California Emissions Estimator Model, Version 2020.4.0 (CalEEMod). Emissions were estimated assuming that construction would begin in begin in October 2023 and continue through 2024. CalEEMod emissions results are summarized below and included in **Appendix D**.

Operation Analysis

Air quality effects associated with the operation of the Project would include emissions from vehicle traffic and area sources (e.g., landscape equipment, gas grills, and consumer products). Annual operation emissions for the Project were calculated using CalEEMod. **Appendix D** includes the assumptions and inputs incorporated into CalEEMod. CalEEMod default values were used in most cases. Trip generation estimates were based on the Traffic Impact Analysis prepared for the Project (**Appendix F**).

Hazardous Air Pollutants

Construction activities would result in short-term emissions of diesel particulate matter (DPM) from off-road heavy-duty diesel equipment exhaust and diesel-fueled haul trucks. Construction-related HAP emissions are addressed within the construction emissions discussion below. Operational HAPs are primarily associated with manufacturing sites, dry cleaners, autobody shops and industrial land uses. The Project does not include any facilities that would emit substantial sources of HAPs; accordingly, no further analysis of operational HAP emissions is provided.

Climate Change

GHG emissions were calculated using CalEEMod. While there are no applicable federal or local significance thresholds for GHGs, the County of San Diego Planning and Development Services Department has recommended using 900 $MTCO_2e$ per year as a screening level to determine if a climate change analysis is warranted (PDS, 2015). To address consistency with regional efforts to address climate change, this analysis compares project emissions of GHGs against this screening level and identifies best management practices incorporated into the Project to reduce GHG emissions.

Tribal New Source Review

New Source Review (NSR) is a preconstruction permitting program for stationary sources under the Clean Air Act. The Project does not include any stationary sources subject to NSR permitting requirements.

Air Quality Impacts

Construction Emissions

Construction emissions were estimated using CalEEMod. The detailed output CalEEMod files generated for this analysis are included in **Appendix D.** The estimated construction emissions are summarized in **Table 3.3-2**.

Table 3.3-2: Estimated Construction Emissions

Construction Year	Tons per Year					
	VOC	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
2023	0.1	1.0	0.8	0.002	0.3	0. 1
2024	0.3	1.6	2.0	0.004	0.1	0.1
Maximum Year Emissions	**0.3**	**1.6**	**2.0**	**0.004**	**0.3**	**0.1**
De minimis Level	25	25	100	N/A	N/A	N/A
Exceed Level?	No	No	No	No	No	No

Notes: N/A = Not Applicable. *De minimis* levels are only applicable for projects in nonattainment and maintenance areas.
Source: **Appendix D**

As shown in **Table 3.3-2**, emissions of individual criteria pollutants from the construction of the Project would not exceed applicable de minimis levels. Construction emissions would be reduced with implementation of construction BMPs described in **Table 2.10-1.** Implementation of construction BMPs is expected to control the production of fugitive dust (PM_{10} and $PM_{2.5}$) and to reduce emissions of criteria pollutants and DPM. This would reduce the overall quantity of these emissions and dust that could disperse off-site and negatively affect neighboring areas. Additionally, emissions of criteria air pollutants would not exceed the Screening-Level Thresholds identified by San Diego County. For comparison, the County's Screening-Level Thresholds are VOC = 13.7 tons/year; NOx = 40 tons/year; CO = 100 tons/year; SO_2 = 40 tons/year; PM_{10} = 15 tons/year; $PM_{2.5}$ = 10 tons/year (San Diego County, 2007).

Construction-related HAP emissions would be limited to DPM from diesel-powered equipment. This equipment would be operated intermittently over the construction period. Construction activities would occur over an area of at least 20 acres rather than being concentrated in one area. The construction area would be 400 feet from the nearest residence and most construction would occur at greater distances. This distance would allow for the dispersal of the minor amounts of DPM emissions. Due to the minor amount of associated $PM_{2.5}$ emissions shown in **Table 3.4-2**, the short duration of construction and dispersal of DPM emissions, construction-related HAP emissions would not pose a health risk to nearby residents or workers. Construction of the Project would not result in significant effects to air quality.

Operation Emissions

Air quality effects associated with the operation of the Project would include emissions from vehicle traffic and area sources (e.g., landscape equipment). The detailed output CalEEMod files generated for this analysis are included in **Appendix D**. The estimated operational emissions are summarized in **Table 3.3-3**.

Table 3.3-3: Operation Emissions of Criteria Pollutants

Source	Tons per Year					
	VOC	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Emissions	0.2	0.1	0.08	0.0005	0.007	0.007
De minimis Levels	25	25	100	N/A	N/A	N/A
Exceed Level?	No	No	No	N/A	N/A	N/A

Notes: N/A = Not Applicable. *De minimis* levels are only applicable for projects in nonattainment and maintenance areas.
Source: **Appendix D**

As shown in **Table 3.3-3**, emissions of individual criteria pollutants from the operation of the Project would not exceed applicable de minimis levels. Additionally, operational emissions of criteria air pollutants would not exceed the Screening-Level Thresholds identified by San Diego County. Operational emissions would be reduced with implementation of BMPs described in **Table 2.10-1,** including compliance with CalGreen building standards, and use of energy and water saving appliances. The Project does not include any land uses that would generate odors or HAP emissions. Air quality impacts from operation of the Project would be less than significant.

Climate Change

Climate change has global impacts, such as more erratic weather patterns, more frequent droughts, and rising sea levels, as well as regional and local impacts. Climate change for California has the potential to reduce the snowpack in mountainous regions, increase drought periods, increase wildfire frequency and intensity, and reduce water availability in general (USEPA, 2016). Development of the Project would result in an increase in GHG emissions from construction, area sources, and indirect sources related to energy production. **Table 3.3-4** estimates total GHG emissions for the Project.

Table 3.3-4: Greenhouse Gas Emissions

Emission Source	Project MT of CO2e/year
Construction (Maximum Annual)	
Construction	343
Operation (Annual)	
Area	0.003
Energy	202
Mobile	0
Solid Waste	33
Water/Wastewater	10
Operation Total	245

Notes: CO2e = carbon dioxide equivalent; MT = metric tons
Source: **Appendix D**

As shown in **Table 3.3-4**, there are no projected GHG emissions from mobile sources during operation as the Project is expected to generate fewer daily trips than the existing Singing Hills Hotel, which would be closed and repurposed as dormitory facilities. Further, the establishment of on-site dormitory and living facilities for students, players and staff would promote fewer vehicle trips than a typical development project.

Neither the Tribe, USEPA, or the County of San Diego have approved quantitative thresholds related to GHG emissions. However, the County of San Diego Planning and Development Services Department (PDS) has recommended using 900 $MTCO_2e$ per year as a screening level to determine if a climate change analysis is warranted (PDS, 2015). As shown in **Table 3.3-4**, construction of the Project would generate a maximum of 343 $MTCO_2e$ per year during construction and operation of the Project would generate approximately 245 $MTCO_2e$ annually, which are below the screening level identified by the County.

While the County of San Diego does not currently have an adopted Climate Action Plan, efforts to address project-related climate change impacts within the County are focused on achieving reductions of GHG

emissions. The County's identified GHG-reduction measures include installing electric vehicle (EV) charging stations, reducing energy use, requiring water efficient appliances, reducing outdoor water use, and increasing solid waste diversion (County of San Diego, 2023).

The Project incorporates smart growth principles recommended by the USEPA to mitigate the effects of climate change (USEPA, 2023b). These GHG-reduction measures are similar to those identified by the County of San Diego and include the establishment of on-site living quarters for staff and students that reduces reliance on vehicle travel, the use of daylighting and other features to minimize the need for artificial lighting, and the reuse of existing infrastructure and buildings to take advantage of previous investments and the energy already used to build them.

To further lessen project-related GHG emissions, BMPs have been provided in **Table 2.10-1**. Construction BMPs include minimization of equipment idling, use of environmentally preferable materials, and proper maintenance of construction equipment. Operational BMPs would reduce indirect GHG emissions through consistency with certain CalGreen building standards, including the provision of electrical vehicle charging infrastructure, use of electric boilers and appliances in lieu of natural gas or propane units, use of energy and water efficient fixtures, and proper maintenance of equipment. These BMPs are similar to measures identified by the County and USEPA to reduce GHG emissions. Therefore, implementation of the Project would not result in significant off-Reservation impacts associated with GHG emissions.

3.4 BIOLOGICAL RESOURCES

3.4.1 Regulatory Setting

Tribal

Natural and Cultural Resources Management Plan, Forest Management Plan, Brush Management Implementation Plan

The Tribe is committed to environmentally responsible growth commensurate with surrounding government agencies. As such, the Tribe has implemented ordinances and plans that govern land use and building practices to balance development with protection of natural resources on the Reservation. The Natural and Cultural Resources Management Plan (NRMP), approved in June 2011, assists the Tribe in future land use planning and resource management on undeveloped portions of its existing Reservation and trust land, as well as future fee and trust land (AES, 2011a). The NRMP governs the three basic land uses on the Reservation by land classification: development areas, preservation areas, and conservation areas. The NRMP's implementation and conservation efforts are consistent with the biological and habitat preservation goals and standards of the San Diego County Multiple Species Conservation Program (MSCP).

The USFWS issued a Biological Opinion (BO) in 2011 acknowledging the NRMP is consistent with MSCP (USFWS, 2011; San Diego County, 1997). The BO contains conservation measures that were implemented during construction of the Tribe's original developments on the Reservation.

Other Tribal plans include the Forest Management Plan enacted in March 2015, which protects riparian corridors, and the Brush Management Implementation Plan, enacted in February 2015, which promotes on-Reservation fire safety.

Federal

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) protects species at risk of extinction and provides for conservation of the ecosystems on which they depend. The U.S. Fish & Wildlife Service (USFWS) and the National Oceanic and Atmosphere Administration Fisheries Service (NOAA Fisheries) share responsibility for implementing FESA. Generally, USFWS manages terrestrial and freshwater species, while NOAA is responsible for marine and anadromous species. Section 9 (§ 1538) prohibits the "take" of a listed species by anyone, including private individuals and state and local agencies. Threatened and endangered species on the federal list (50 CFR Sections 17.11 and 17.12) are protected from take, which is defined as direct or indirect harm.

Magnuson-Stevens Act and Sustainable Fisheries Act

The Magnuson–Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) is the primary law that governs marine fisheries management in U.S. federal waters. First passed in 1976, the Magnuson-Stevens Act fosters the long-term biological and economic sustainability of marine fisheries. The Sustainable Fisheries Act of 1996 (Public Law 104-297) amended the Magnuson-Stevens Act to establish new requirements for fishery management councils to identify and describe Essential Fish Habitat (EFH) and to protect, conserve, and enhance EFH for the benefit of fisheries. EFH is defined as those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity.

Migratory Bird Treaty Act

Migratory birds are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (16 USC 703-711). The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed under 50 CFR 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). The direct injury or death of a migratory bird due to construction activities or other construction-related disturbance that causes nest abandonment, nestling abandonment, or forced fledging would be considered take under federal law.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act was originally enacted in 1940 to protect bald eagles and was later amended to include golden eagles (16 USC Subsection 668-668). This act prohibits take, possession, and commerce of bald and golden eagles and associated parts, feathers, nests, or eggs with limited exceptions. The definition of take is the same as the definition under the FESA.

Clean Water Act - Sections 404 and 401

Any project that involves discharge of dredged or fill material into navigable Waters of the U.S. must first obtain authorization from the USACE, under Section 404 of the CWA. Projects requiring a 404 permit under the CWA also require a Section 401 certification from either USEPA for trust land, or the Regional Water Quality Control Board for non-trust land. These two agencies also administer the NPDES general permits for construction activities disturbing one acre or more.

State and Local

To provide context, State, and local policies applicable to off-Reservation areas only are presented below.

California Endangered Species Act

The California Endangered Species Act (CESA) established that it is State policy to conserve, protect, restore, and enhance state-listed species and their habitats. Under State law, plant and animal species may be formally listed by the California Fish and Game Commission and receive protection on off-Reservation lands.

California Fish and Game Code

For off-Reservation lands, the California Fish and Game Code defines “take” (Section 86) and prohibits take of a species listed under the CESA (California Fish and Game Code § 2080), or otherwise special status (California Fish and Game Code §§ 3511, 4700, and 5050). Section 2081(b) and (c) of the CESA allows CDFW to issue an incidental take permit for a State-listed species if specific criteria outlined in Title 14 CCR §§ 783.4(a), (b) and CDFW Code § 2081(b) are met. The CDFW Code § 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird except as otherwise provided by the code. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA or any part of such migratory non-game bird except as provided by rules and regulations adopted by the U.S. Secretary of the Interior under provisions of the MBTA.

Native Plant Protection Act of 1977

The Native Plant Protection Act of 1977 and implementing regulations in Section 1900 et seq. of the California Fish and Game Code designate special-status plant species and provide specific protection

measures for identified populations. The CDFW administers the Native Plant Protection Act on off-Reservation lands.

Multiple Species Conservation Program

The San Diego County Multiple Species Conservation Program (MSCP) is a long-term, regional habitat conservation plan approved by the USFWS to establish a connected preserve system that protects sensitive species and habitats and provides offset for impacts from off-Reservation development on habitat for listed and other covered species. Off-Reservation development projects within the MSCP area are required to comply with the Biological Mitigation Ordinance (discussed below).

San Diego County Ordinances

The following County of San Diego Codes and Regulations protect off-Reservation natural resources only:

- *Clearing of Vegetation/Grading and Clearing Ordinance (No. 9547).* This ordinance regulates vegetation clearing and grading.
- *Coastal Sage Scrub Habitat Ordinance (No. 8365).* This ordinance regulates development to avoid potential loss of Coastal Sage Scrub Habitat.
- *Sensitive Habitats/Resource Protection Ordinance (Nos. 7968, 7739, 7685 and 7631).* This ordinance protects steep-slope lands, wetlands, floodplains, and sensitive habitats (including mature riparian woodland) and applies to discretionary projects.
- *Biological Mitigation Ordinance.* This ordinance specifies mitigation standards for covered species and their habitat and applies to discretionary projects.

3.4.2 Environmental Setting

A biological resources survey of the Project Site was conducted by Harris & Associates on April 7, 2023. The purpose of the survey was to identify habitat types, potentially occurring federally-listed species, wetlands and waters of the U.S., and other potential biological constraints of the Project Site. Additionally, the following information sources have been reviewed:

- Biological Constraints Memorandum (Harris & Associates, 2023)
- Aerial photography of the Project Site
- Sycuan Band of the Kumeyaay Nation NRMP (AES, 2011a)
- USFWS National Wetlands Inventory (NWI) and National Hydrography Dataset (Figure 5 of **Appendix E**)

Habitat Types

Habitat types are listed in **Table 3.4-1** and shown on exhibits in **Appendix E**. The Project Site contains facilities associated with the Singing Hills Golf Resort, including the hotel and associated parking, a portion of the Pine Glen golf course, a portion of the driving range, a man-made pond, and a service road connection to Willow Glen Drive. The man-made pond was constructed for ornamental purposes and is lined with plastic.

Table 3.4-1: Habitat Types

Habitat Type	Acres in Project Site
Ruderal/Developed	27.4
Southern Riparian Woodland (Disturbed)	0.1
Man-made Pond	0.5

The southern riparian woodland is located along the southwestern border of the Project Site and is disturbed by encroachment of invasive species and from maintenance of the golf course directly east of the southern riparian woodland. San Diegan Coastal Sage Scrub, considered a sensitive habitat by the Tribe's NRMP and the County's MSCP, occurs on the Reservation but does not occur on the Project Site. Additionally, Figure 15 of the NRMP designates habitat in the Project Site as developed and of low habitat tier and valuation.

Wetlands/Waters of the U.S.

The NWI does not list and known jurisdictional aquatic resources within the Project Site, and the isolated man-made pond is unlikely to be considered a jurisdictional water of the U.S. due to a lack of connectivity and wetland indicators (Harris & Associates, 2023). The pond is built up such that it does not receive sheet flow from the surrounding golf course. The NWI and the National Hydrography Dataset (NHD) identified several aquatic features surrounding the Project Site (Figure 5 of **Appendix E**). An ephemeral riverine feature originates north of the Project Site and occurs parallel to the northwestern boundary until it joins the Sweetwater River south of the Project Site. The Sweetwater River is just south of the Project Site.

Federally-listed Species

No federally listed species were observed during the survey. The Project Site does not contain suitable habitat for federally-listed plant or animal species. San Diegan Coastal Sage Scrub, which is considered suitable habitat by the Tribe's NRMP and the County's MSCP for coastal California gnatcatcher (*Polioptila californica californica;* CCG), occurs approximately 100 feet off-Reservation to the west and 300 feet on-Reservation to the south. Both areas are narrow sections of habitat located adjacent to Willow Glen Drive and are indirectly affected by associated traffic. In accordance with the BO, a 32-acre area of San Diegan Coastal Sage Scrub with documented gnatcatcher occurrences has been designated as a conservation area on the Reservation. This area is outside of the Project Site and off-site improvement area. Southern Arroyo Willow Riparian habitat which is considered suitable for Least Bell's vireo (LBV; Vireo bellii pusillus) occurs just south of the Project Site along the Sweetwater River.

Migratory Birds

Migratory birds and other birds of prey, protected under 50 CFR 10 of the Migratory Bird Treaty Act (MBTA), have the potential to nest on and near the Project Site. The nesting season for raptors and other migratory birds occurs generally between February 1 and August 31.

Designated Critical Habitat and Corridors

Designated or proposed critical habitat and EFH does not occur on the Project Site (Harris & Associates, 2023). Critical habitat for CCG occurs immediately north and approximately 0.75 mile southeast of the

Project Site and critical habitat for Hermes Copper butterfly occurs approximately 0.75 mile to the southeast (AES, 2011a).

The Tribe and USFWS have identified and implemented a wildlife corridor on both sides of Dehesa Road as shown in the NRMP. This corridor connects on-Reservation open space in the vicinity of Willow Lake on both sides of Dehesa Road to off-Reservation open space. The Project Site has been previously developed and is not located within this area or other areas that could facilitate high-value wildlife movement. Per the NRMP, the Project Site is designated as Developed Area (AES, 2011a).

3.4.3 Impacts

Significance Criteria

A project would have a significant adverse impact if development or operation would result in the loss of sensitive habitat; have a substantial adverse effect on species with special status under the FESA; have a substantial adverse effect on habitat necessary for the future survival of such species, including areas designated as critical habitat by the USFWS; result in a take of migratory bird species as defined by the MBTA; have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA through direct removal, filling, hydrological interruption, or other means, and/or conflict with provisions of the Tribe's NRMP.

Sensitive Habitat

The Project Site does not contain sensitive habitat. Per Figure 2 of the NRMP, the Project Site is designated as Developed Area. Development would occur within previously developed and disturbed areas. Additionally, the Project is consistent with conservation measures in the BO and NRMP goals, including limiting construction to previously developed land. Figure 15 of the NRMP designates habitat in the Project Site as low habitat tier and valuation. As the Project is consistent with the NRMP and does not disturb sensitive habitat, impacts to sensitive habitat are considered less than significant.

Wetlands/Waters of the U.S.

The NWI does not list jurisdictional aquatic resources within the Project Site, and the man-made pond is unlikely to be considered a jurisdictional water of the U.S. due to lack of connectivity and wetland indicators (Harris & Associates, 2023). Wetlands and waters of the U.S. were not observed on the Project Site during the survey. Indirect impacts from potential discharge of pollutants to offsite surface waters during construction is addressed in **Section 3.8.3.** With adherence to the NPDES permitting program and implementation of a Stormwater Pollution Prevention Plan included as BMPs (**Table 2.10-1**), indirect impacts would be less than significant.

Federally Listed Species

No federally listed species were observed during the survey, and the Project Site does not contain suitable habitat to support federally-listed plant or animal species. Federally-listed bird species (CCG and LBV) may occur in areas near the Project Site such as San Diegan Coastal Sage Scrub to the west and south, and Southern Arroyo Willow Riparian to the south. Noise from construction of the Project Site may indirectly impact these species. Mitigation measures identified in **Table 4-1** include pre-construction nesting bird surveys which would reduce potential indirect impacts to a less-than-significant level.

Nesting Migratory Birds

Suitable nesting habitat for bald and golden eagles does not occur on or adjacent to the Project Site. The Project Site may provide suitable nesting habitat for migratory birds and raptors. Potential impacts to nesting migratory birds could result should construction activities commence during the general nesting season (February 1 – August 31). Mitigation measures identified in **Table 4-1** include pre-construction nesting bird surveys. BMPs listed in **Table 2.10-1** include the use of shielded and downcast lighting, which would reduce light and glare impacts on migratory birds. With BMPs and mitigation, impacts to migratory birds would be less than significant.

Designated Critical Habitat and Corridors

Designated or proposed critical habitat and EFH does not occur on the Project Site. Critical habitat for CCG occurs immediately north and approximately 0.75 mile southeast of the Project Site. Critical habitat for Hermes Copper butterfly occurs approximately 0.75 mile to the southeast. These areas would not be directly impacted by the Project. Indirect impacts from construction noise to suitable CCG habitat to the north would be minimal as activities within 300 feet of this habitat are limited to interior renovations and habitat is already indirectly impacted by traffic noise along Dehesa Road. The Project Site has been previously developed and is not located within areas that could facilitate high-value wildlife movement. For these reasons, impacts would be less than significant.

NRMP Consistency

Provisions of the Tribe's NRMP, as acknowledged in the BO (USFWS, 2011), include to:

- Protect against degradation of existing natural resources
- Preserve sensitive habitat and habitat likely occupied by federally listed species
- Maintain viable wildlife corridors on the Reservation
- Preserve riparian corridors

Per the NRMP, the Project Site is designated as Developed Area (AES, 2011a). The Project would not offset sensitive habitat, habitat suitable to support federally-listed species, or wildlife corridors. Therefore, the Project is consistent with provisions of the NRMP.

3.5 CULTURAL AND PALEONTOLOGICAL RESOURCES

3.5.1 Regulatory Setting

Tribal

Natural and Cultural Resources Management Plan

The Natural and Cultural Resources Management Plan (NRMP) provides for comprehensive management and protection of the Tribe's natural and cultural resources as a tool for future land planning and necessary development activities on the Sycuan Reservation (or Plan Area). The general goals of the NRMP are to coordinate land use planning in undeveloped areas. The goals and objectives of the NRMP related to cultural resources include to:

- Minimize the degradation of existing natural and cultural resources in the Plan Area through Sycuan's long-term management of all trust lands.
- Preserve all known culturally significant sites within the Plan Area.

Guidelines for cultural resources mitigation (Section 5.3 of the NRMP) include avoidance, a feasibility analysis conducted by the Tribe, use of orange construction fencing, monitoring during earthmoving activities near a known cultural resource or in areas of higher archaeological sensitivity, provisions in the event of an inadvertent discovery.

Federal

Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 (ARPA) provides for the protection of archaeological resources and sites on public and Indian land and fosters increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals having collections of archaeological resources and data that were obtained before October 31, 1979. ARPA also provides penalties for noncompliance and illegal trafficking.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA; 25 USC 3001 et seq.) provides a process for museums and federal agencies to return Native American cultural items – human remains, funerary objects, sacred objects, or objects of cultural patrimony – to lineal descendants, and culturally affiliated Indian tribes and Native Hawaiian organizations. NAGPRA includes provisions for unclaimed and culturally unidentifiable Native American cultural items, intentional and inadvertent discovery of Native American cultural items on federal and Tribal lands, and penalties for noncompliance and illegal trafficking.

Antiquities Act of 1906

The Antiquities Act of 1906 (PL 59-209; 16 U.S.C. 431 et seq.; 34 Stat. 225) calls for the protection of historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest on lands owned or controlled by the government of the United States.

State and Local

County of San Diego Resource Protection Ordinance

The County of San Diego Resource Protection Ordinance (RPO) is not applicable to tribal trust lands but applies to off-Reservation development within the County. The RPO requires off-Reservation cultural resources to be evaluated as part of the County's discretionary environmental review process, and prohibits development, trenching, grading, clearing, or any other activity or use that damages significant prehistoric or historic sites.

3.5.2 Environmental Setting

Methodology

This section summarizes information from previously prepared documents regarding cultural resources in the San Diego County area, the Tribe's Natural and Cultural Resources Management Plan (AES, 2011a), the Final Environmental Assessment for the fee-to-trust of land including the Project Site (AES, 2011b), and a cultural resources summary prepared for the Project (Sycuan, 2023a). A cultural resources survey of the Project Site was conducted by a Sycuan Tribal Monitor in April and May 2023. The survey consisted of pedestrian transects and shovel test probes. Shovel test probes did not detect cultural resources. One resource was identified during the pedestrian survey, just within the Project Site boundary.

Prehistoric and Historic Overview

The Paleoindian period, dating from 12,000 to 8000 BP, is typified by artifact assemblages termed the San Dieguito complex. The Archaic period (also referred to as the Millingstone horizon or La Jolla complex) lasted from approximately 8000 to 2000 B.P. Archaic shell middens are documented along the northern San Diego County coast (AES, 2011b). The subsequent Late Prehistoric period in San Diego County differs from the Archaic period in the occurrence of small, pressure flaked projectile points, the replacement of flexed inhumations with cremations, the introduction of ceramics, and an emphasis on inland plant food collection, processing, and storage, especially of acorns (AES, 2011b). These sites are often attributed to the ethnographic Kumeyaay.

The Reservation lies within the territory traditionally occupied by the Tribe, and the Kumeyaay have been the continuous occupants of the land. The Sycuan Cultural Resource Center and Museum is a prehistoric site (CA-SDI-4515) and part of the Village of Matamo. This area of Dehesa is described as an extremely large village (0.5 by 0.25 mile) with stone walled house bases, associated artifacts (Tizon Brownware pottery, lithic debitage, and groundstone fragments), midden soils, and numerous milling features (30+ mortars and 60+ grinding slicks) (AES, 2011b). The original village was destroyed by previous owners during construction of a Tennis Club in the mid-1970's, subsequent to the studies completed in 1975.

The first documentation of Matamo was in 1910 by anthropologist Hodges. It was again recorded in 1925 by Kroeber and in 1973 by Carrico, with later updates by Fink in 1974, Kaldenberg in 1975, and Hofmeister in 1975. ln 1984 a site documentation and excavation led by Apple identified a total of 87 bedrock milling features with the larger site area, 57 of which contained a single milling element consisting of a lightly to moderately worn slick. Four different loci of midden soils ere encountered, and an extensive amount of subsurface material, including flakes/debitage, ceramics, and bone were recovered (Sycuan, 2023a).

The Singing Hills Golf Resort, including the Project Site, is within the northwest section of Matamo Village. Two village sites are located at the northern end of Matamo and east of the Project Site (Sycuan, 2023a).

One of the most prominent figures in the recent history of the Kumeyaay is Augustin Paipa who was born circa 1770 at Matamo Village. A direct ancestor of enrolled tribal citizens of the Tribe, and the connection to the lands and resources located within the Village of Matamo. Augustin was captured by Spanish soldiers as a child and taken to Mission San Diego de Alcala to be raised as a neophyte. ln 1885 he returned to his place of birth at Matamo to witness occupation by the Weddle Family. Augustin lived out his life there. Upon his death in 1900, Augustin was recognized as a traditional leader of the Sycuan Band and was reportedly related to all Tribal members with only one exception (AES, 2011a).

Paleontological Resources

The Reservation is situated in the foothills of the Peninsular Range, which contains paleontological resources found in sedimentary rock units formed during the most recent of the three periods of the Cenozoic Era (up to 2.6 million years ago), known as the Quaternary alluvial. The sedimentary rock units have yielded fossil remains from Miocene epoch terrestrial mammals and marine invertebrate fossils. However, known fossil occurrences in the Peninsular Range Region are rare. An online search of the University of California Museum of Paleontology (UCMP) records noted 14,800 fossil specimens in San Diego County, primarily microfossils and invertebrates (UCMP, 2023). No paleontological resources have been reported within the Project Site.

3.5.3 Impacts

Significance Criteria

A significant effect would occur if the implementation of the Project resulted in conflicts with the NRMP or impacts to historic properties, archeological resources, human remains, or other cultural items.

Cultural Resources

A cultural resources survey of the Project Site and shovel test probes were conducted by a Sycuan Tribal Monitor in April and May 2023 consistent with the NRMP guidelines to conduct a feasibility analysis. Shovel test probes did not detect resources. One resource was identified on the edge of the Project Site during the pedestrian survey. The resource is outside of the extent of grading and other earth-disturbing activities and thus would be avoided, consistent with the NRMP goals, objectives, and mitigation guidelines. To ensure further protection, BMPs listed in **Table 2.10-1** include that the resource shall be fenced with orange construction fencing under the supervision of a Sycuan Tribal monitor. The fencing shall remain in place during the duration of construction activities.

Due to recorded village sites in the area and Alluvium soils, there is a potential for impacts to unrecorded subsurface cultural resources and ancestral remains to occur during construction. Consistent with the NRMP, mitigation in **Table 4-1** includes monitoring of ground disturbing activities by a Sycuan Tribal monitor, and provisions in the event of an inadvertent discovery.

Paleontological Resources

No paleontological resources have been reported within the Project Site. As discussed above, known fossil occurrences in the Peninsular Range Region are rare, and the Project Site and vicinity therefore have marginal to low chance of fossil discovery. For these reasons, impacts to paleontological resources would be less than significant.

3.6 GEOLOGY AND SOILS

3.6.1 Regulatory Setting

Federal

International Building Code

The International Building Code (IBC) is a model building code developed and published by the International Code Council (ICC). It is a comprehensive set of regulations that establishes minimum standards for the design, construction, and maintenance of buildings and structures. The IBC covers various aspects of building safety, including fire protection, structural integrity, occupancy classifications, means of egress, accessibility, and energy efficiency. The code aims to ensure the safety of occupants and the general public, as well as the durability and resilience of buildings in the face of various hazards, such as fire, seismic events, wind, and other environmental factors.

National Pollutant Discharge Elimination System Construction General Permit

Construction projects disturbing one or more acres of soil must be covered under the National Pollutant Discharge Elimination System (NPDES) general permitting process. For tribal projects on trust land, the contractor proposing the project must submit a Notice of Intent to comply with the U. S. Environmental Protection Agency's (USEPA) Construction General Permit. The USEPA's Construction General Permit also requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must list best management practices (BMPs) that address stormwater runoff rates and quality.

State and Local

To provide context, State, and local policies applicable to off-Reservation areas only are presented below.

Alquist–Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (formerly the Alquist-Priolo Special Studies Zone Act), signed into law December 1972, requires the delineation of zones along active and potentially active faults in California. The California Geological Survey (CGS) defines an "active" fault as one that exhibits evidence of activity during the last 11,000 years. Faults that exhibit evidence of Quaternary activity (within the last 1.6 million years) are considered to be "potentially active." The purpose of the Alquist-Priolo Act is to regulate off-Reservation development on or near fault traces to reduce the hazard of fault rupture and to prohibit the location of most off-Reservation structures for human occupancy across these traces.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act was enacted in 1991 to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and from other hazards caused by earthquakes. This act requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within the portions of these zones over which they have jurisdiction.

3.6.2 Environmental Setting

Geology

The Project Site is located within the Peninsular Ranges Geomorphic Province (CGS, 2002). The Peninsular Ranges are series of ranges separated by northwest trending valleys, subparallel to faults branching from the San Andreas Fault. The trend of topography is similar to the Coast Ranges, but the geology is more like the Sierra Nevada, with granitic rock intruding the older metamorphic rocks. The Peninsular Ranges extend into lower California and are bound on the east by the Colorado Desert. The Los Angeles Basin and the island group (Santa Catalina, Santa Barbara, and the distinctly terraced San Clemente and San Nicolas islands), together with the surrounding continental shelf (cut by deep submarine fault troughs), are included in this province (CGS, 2002).

Soil Types and Characteristics

Soil survey reports for the Project Site and surrounding areas are available online through the Natural Resources Conservation Service (NRCS), a sub-unit of the U.S. Department of Agriculture. Each NRCS survey map illustrates the various type and location of soil units and provides a summary of major physical characteristics with recommendations based on the soil characteristics. **Figure 3.6-1** provides a map of soils on the Project Site. Soils mapped on the Project Site consist of Chino silt loam (CkA), Cieneba-Rock outcrop complex (CmrG), and Tujunga sand (TuB) (USDA, 2023).

Soil Hazards

The hydrologic soil group is a classification based on the runoff potential of the soils when thoroughly saturated by a long duration storm. Soils are grouped into four classes grading from A to D, with A being coarse-grained soils with high infiltration and low runoff potential, and D being mostly fine-grained clays with extremely slow infiltration and high runoff potential. The majority of the soils on the Project Site have a hydrologic rating of C indicating a moderately high runoff potential when thoroughly wet (USDA, 2023). Other mapped soils on the Project Site have hydrologic ratings of A and D, indicating low and high runoff potential when thoroughly wet (USDA, 2023).

Drainage class is a measure of the frequency and duration of wet periods under conditions similar to those in which the soil developed. The soils on the Project Site are a mixture of moderately well-drained and somewhat excessively drained soil types (USDA, 2023).

Saturated hydraulic conductivity is a quantitative measurement of the movement of water through saturated soil, or the ease with which pores in a saturated soil transmit water, abbreviated as “Ksat”. Ksat is a factor in determining the hydrologic soil group and is often used in the design of water and wastewater disposal features such as percolation ponds and septic systems. Ksat measures transport only in a vertical direction under completely saturated conditions. It is considered an inherent property irrespective of a soil’s native surroundings and does not account for site-specific variations such as confining layers, degree of saturation, or topography. The majority of the soils on the Project Site transmit water at a rate of 4.8 micrometers per second, which is considered a moderately high rate. Other mapped soils on the Project Site transmit water at rates of 12.4 and 92.0, which are considered high rates (USDA, 2023).

FIGURE 3.6-1

SOILS OVERVIEW

Corrosivity pertains to a soil-induced electrochemical or chemical action that corrodes concrete or steel. The soils on the Project Site have a high risk of corrosion of steel and a low to moderate risk of corrosion to concrete (USDA, 2023).

Expansive soils are largely comprised of clays, which may increase in volume when water is absorbed and shrink when dried; this property is measured using linear extensibility. Expansive soils are of concern because they can cause building foundations to rise during the rainy season and fall during the dry season, causing structural distortion. The soils within the Project Site have low linear extensibility ratings, and thus low shrink-swell potential (USDA, 2023).

Landslides and Liquefaction

The primary cause of a landslide is a steep slope that becomes overburdened by weight; the point at which instability is reached is based on various factors, including saturation (by snowmelt or heavy rains) and seismic activity. Liquefaction occurs when loose, saturated, generally fine sands and silts are subjected to strong ground shaking. The soils lose shear strength and become liquid, resulting in large total and differential ground surface settlements, as well as possible lateral spreading during an earthquake. There are no mapped landslide or liquefaction hazards in the vicinity of the Project Site (DOC, 2023).

Seismic Conditions

The Project Site is located in a seismically active area, as is the majority of southern California. Accordingly, the potential for strong ground motion in the region is high. However, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone as mapped by the California Department of Conservation (DOC, 2023). The nearest potentially active fault is located about 16 miles west of the Project Site within the San Diego section of the Newport-Inglewood-Rose Canyon Fault Zone (USGS, 2023a).

Mineral Resources

A search of the USGS Mineral Resources Data System found no known mineral resources within the Project Site. There are several former and on-going mining activities for sand and gravel in the vicinity of the Project Site, including Sloan Canyon Sand Pit and Dehesa Operation (USGS, 2023b).

3.6.3 Environmental Impacts

Significance Criteria

Impacts to geology and soils would be significant if the Project substantially alters topography such that it causes adverse effects, such as landslides. Seismic conditions would be adversely affected if the Project substantially increases the occurrence of seismic events or increases the risks from seismic events. Impacts to soils would be significant if the Project significantly increases soil erosion. Mineral resources would be significantly affected if the Project reduces the regional availability of commercial mineral resources or increases the cost of extracting mineral resources.

Methodology

Off-Reservation impacts of the Project with respect to geology, soils, and mineral resources were analyzed based on the existing soil types and topography of the Project Site and its vicinity, proximity of the Project

Site to known faults, proposed changes to the Project Site and vicinity, and estimates of how the Project would affect existing off-Reservation geologic, soils, and mineral resources.

Topography

The topography of the Project Site was previously modified for development of the Singing Hills Hotel and Pine Glen Golf Course and is not considered to be an undeveloped landscape. Construction of the Project would require grading in the central and southern portions of the Project Site as shown on the Grading Plan, to level areas for building pads, circulation, and soccer fields (**Appendix A-1**). Construction of the Project would adhere to Tribal standards equivalent to the IBC which would reduce risks such as slope instability. With adherence to applicable building standards, impacts related to topography would be less than significant.

Seismic Conditions

The nearest potentially active fault is located approximately 16 miles west of the Project Site (USGS, 2023a). Ground shaking generally decreases with distance and increases with the depth of unconsolidated alluvial deposits. Considering the distance to the causative faults, the potential for ground motion in the vicinity of the Project Site is minimal. The Project would be constructed in accordance with Tribal standards equivalent to the IBC, which would allow ground shaking related hazards to be managed from a geologic, geotechnical, and structural standpoint such that adverse impacts to the health or safety of workers or members of the public would be minimized. Therefore, the Project would result in a less-than-significant impact.

Landslides and Liquefaction

As described above, there are no mapped landslide or liquefaction hazards in the vicinity of the Project Site (DOC, 2023). Additionally, there are no geologic hazards or significantly unstable soil conditions known to exist on the Project Site which could contribute toward landslides. Activities such as grading may result in the potential for short-term soil disturbance or erosion impacts which could contribute toward unstable conditions. Consistency with Tribal standards equivalent to the would ensure continued slope stability such that adverse impacts to the health or safety of workers or members of the public would be minimized. Therefore, the Project would result in a less-than-significant impact.

Erosion

Construction

Construction of the Project would involve earth-moving activities such as grading, excavation, stockpiling of soil, installation of new facilities, and the use of heavy machinery and equipment. The Project would require up to 10,000 cubic yards of imported fill, and thus would not require off-site disposal of excess fill. Onsite earth-moving activities would create the potential for impacts related to erosion by exposing soils stockpiled on the Reservation to erosion from stormwater. Erosion risk can be addressed through standard temporary erosion and sedimentation control (TESC) BMPs during construction. These measures have been included as BMPs in **Table 2.10-1** as part of the USEPA NPDES General Construction Permit Stormwater Pollution Prevention Plan. For example, TESC measures would include appropriately placed silt fencing, straw wattles, rock check dams, and plastic covering of exposed slope cuts and soil stockpiles.

With implementation of the BMPs in **Table 2.10-1**, the potential for erosion during construction would be less than significant.

Operation

During operation of the Project, stormwater runoff would be conveyed via an on-site stormwater treatment and collection system to an off-site stormwater treatment BMP and an off-site detention basin located south of the Project Site. This system has been designed to ensure that 100-year storm flows are property treated and detained, which would prevent scouring of downstream drainages and erosion of topsoil (**Appendix A-2**). As such, impacts would be less than significant.

Mineral Resources

As stated above, there are no known mineral resources within the Project Site. Therefore, the Project would have no impact on mineral resources.

3.7 HAZARDS AND HAZARDOUS MATERIALS

3.7.1 Regulatory Setting

Federal

Hazardous materials are extensively regulated at the federal level to safeguard public health, the environment, and occupational safety. Numerous federal statutes, guidelines, and standards have been established under the purview of multiple federal agencies, including the Environmental Protection Agency (EPA), the Department of Transportation (DOT), and the Occupational Safety and Health Administration (OSHA), to govern the manufacturing, storage, transportation, and disposal of hazardous substances. The regulations apply to a wide range of hazardous materials, including toxic chemicals, flammable substances, radioactive materials, and infectious agents. Below summarizes relevant regulations and laws:

- Federal Hazardous Material Transportation Act is the basic statute regulating hazardous materials transportation in the U.S. The purpose of the Federal hazmat law is to protect against the risks to life, property, and the environment that are inherent in the transportation of hazardous material in intrastate, interstate, and foreign commerce. It covers hazardous material registration, classification, communication, training and security, packaging requirements, and operation rules.
- Resource Conservation and Recovery Act regulates the land disposal of hazardous materials from cradle to grave. This means establishing a regulatory framework for the generation, transport, treatment, storage, and disposal of hazardous waste. A solid waste can consist of solids, liquids and gases, but these must be discarded in order to be considered waste. There are set minimum national technical standards for how disposal facilities should be designed and operated.
- Food, Drug, and Cosmetic Act sets maximum residue limits, or tolerances, for pesticides residues on food. When a tolerance level for a food is set, this is the level deemed safe. In defining safe, this means that, “reasonable certainty that no harm will result from aggregate exposure to the pesticide residue.”
- Hazard Communication Standard helps ensure employee safety by regulating the handling and use of chemicals in the workplace, such as administering the Hazard Communication Standard. The HCS ensures safety in the workplace and also requires that chemical manufactures and importers evaluate the hazards associated with the chemicals they create or import, and that these chemicals have proper labels and material safety data sheets concerning their hazards to others (e.g., customers).
- Federal Hazardous Substances Act primarily deals with the labeling of consumer products and only requires products that may at some point be in the presence of people’s dwellings to be labeled, including during purchase, storage, or use. These labels must alert consumers of the potential hazards that the product may pose.
- Federal Insecticide, Fungicide, and Rodent addresses the sale, distribution, and labeling of pesticides, as well as the certification and training of pesticide applicators. It establishes recordkeeping and reporting requirements on certified applicators of restricted use pesticides, and imposes storage, disposal, and transportation requirements on registrants and applicants for the registration of pesticides.
- Toxic Substances Control Act permits the USEPA to evaluate the potential risk from novel and existing chemicals and address unacceptable risks chemicals may have on human health and the environment. The USEPA oversees the production, importation, use, and disposal of certain

chemicals. This includes the USEPA having the authority to require record keeping, reporting, and test requirements and restrictions associated with certain chemical substances and/or mixtures.
- Emergency Planning and Community Right-to-Know Act is designed to assist local communities in protecting public health, safety, and the environment from chemical hazards. It helps increase the public's knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. It also requires industry to report on the storage, usage, and releases of hazardous substances to federal, state, and local governments.
- CFR Title 40, Chapter I, Subchapter I, Part 280 sets technical standards and corrective action requirements for owners and operators of USTs.

3.7.2 Environmental Setting

Hazardous Materials

Given the complex multitude of federal, State, and local authorities that regulate and oversee hazardous materials, there is no singular definition for a hazardous material. However, in general, a hazardous material is defined as any solid, liquid, or gaseous material that is radioactive, toxic, explosive, flammable, corrosive, or that otherwise poses an unreasonable risk physically or biologically, such as to health, safety, and property.

SCS Engineers completed a Phase I Environmental Site Assessment (ESA) on March 31, 2023, to assess the potential for recognized environmental conditions (RECs) in connection to the Project Site as a result of the current or historical land use or from a known and reported off-site source (SCS Engineers, 2023a). RECs refer to the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with relevant laws. The Phase I ESA was prepared in accordance with the USEPA 40 CFR Part 312 and the American Society for Testing and Materials (ASTM) Standard Practice E 1527-21. The Phase I ESA performed the following to determine the presence of RECs on or within 1-miles radius of the Project Site:

- On-site and off-site reconnaissance, database research, interviews, and user requirements.
- Identification of potential data gaps in connection the Project Site and off-site sources.
- Review of topography, geology, hydrogeology, and water quality survey information.
- Historical and vicinity land use review.

During on-site reconnaissance on March 14 and March 20, 2023, the interiors of the Project Site buildings were observed, and the grounds and perimeter were systematically traversed on foot during the site reconnaissance. Pool cleaning supplies such as liquid chlorine and pH balancers were observed during the Project Site reconnaissance, but all of the supplies were observed to be in their original containers with no obvious evidence of leaks or spills. One SDG&E transformer was observed to be located at the Project Site, but SDG&E specified there were no polychlorinated biphenyls (PCBs) present in their transformers. No obvious indications of wells, cisterns, pits, sumps, dry wells, or bulk storage tanks were observed at the Project Site. No obvious indications of hazardous waste generation or releases were observed at the Project Site during the site reconnaissance. For the area surrounding the Project Site, no obvious indications of the use, storage, or generation of hazardous materials/wastes or petroleum products were observed; however, hazardous materials/wastes are judged likely to be present due to past uses.

Research into the Project Site included a review of government records (e.g., Department of Environmental Health and Quality File Review), interviews with persons familiar with the property, and local, state, and federal, state, and local regulatory database searches with a 1-mile search radius. These searches did not reveal any hazardous material records or data. Interviews stated that with the possible exception of materials associated with laundry services and pool maintenance, hazardous materials and petroleum products were not used, stored, and generated at the Project Site and there have been no releases of hazardous materials, petroleum products, and/or hazardous waste.

Based on a review of historical aerial photographs and other materials, the Project Site and portions of the site vicinity were interpreted to have been historically used for agricultural purposes, such as orchards. Therefore, there is a possibility that organochlorine and metal-based pesticides such as dichlorodiphenyltrichloroethane (DDT), arsenic, and others were used. These classes of pesticides are known to have the potential to remain in detectable concentrations in the subsurface for extended periods of time. Therefore, the Phase I ESA recommended limited soil sampling for organochlorine pesticides and arsenic as a precautionary measure to ensure that future occupants of the Project Site, construction workers, and others are not exposed to elevated concentrations of pesticides, if present. In addition, if soil is to be excavated and exported as part of redevelopment activities, then the presence of pesticides and/or metals may result in the soil being considered regulated or hazardous waste and the soil may need to be properly characterized and disposed of at an appropriate receiving facility. Based on these findings, SCS Engineers completed a Phase II ESA on May 5, 2023, to assess the possible presence and concentrations of chemicals of concern, i.e., organochlorine pesticides and arsenic in the Project Site soils in connection with the proposed redevelopment activities (SCS Engineers, 2023b). On March 27, 2023, SCS Engineers conducted nine soil borings to total depths of up to 3 feet below grade at the Project Site. Samples from these borings were then analyzed in a California-certified laboratory. Results revealed detectable concentrations of organochlorine pesticides and concentrations of the metal arsenic in certain samples collected at the Project Site:

- The reported organochlorine pesticides concentrations were below the Health Risk-Based Mitigation Criteria for commercial/industrial and residential users established by the US Environmental Protection Agency (EPA) Regional Screening Levels. Therefore, the soil is not considered to represent a human health risk to current or future users of the Project Site.
- Detectable concentrations of organochlorine pesticides would be considered a regulated waste if exported from the Reservation. A total of 3 of the 19 soil samples analyzed for organochlorine pesticides were reported with detectable concentrations of organochlorine pesticides. However, since other hazardous waste criteria were not exceeded, the regulated waste soil would likely be considered a non-hazardous regulated waste, but testing would be required to confirm the proper disposal method.
- Arsenic did not exceed the Health Risk-Based Mitigation Criteria for commercial industrial/uses and the levels are within the range of typical background concentrations and do not appear to be indicative of a release of arsenic.

Wildfire History and Risk

The topographic, geographic, and climatic conditions within the County culminate together to result in a regional fire problem for the County. In 2021, in the County there were 210 wildland fires, during which 6,886 acres were burned. Of the 210 fires, 16 were due to lightning, 50 were undetermined, and the rest were human-caused (CALFIRE, 2021). The areas burned consisted of 6,740 acres of brush, 145 acres of grass, 1 acre of timber, and 0 acres of woodland.

The Project Site is located in a Federal Responsibility Area (CALFIRE, 2023a). The surrounding areas are in a very high fire hazard severity zone (CALFIRE, 2023b). To reduce the occurrence of human-caused wildfires, CALFIRE and local agencies regulate outdoor burning through the use of burn restrictions and burn permits. CALFIRE can only issue burn permits for areas within the State Responsibility Area (CALFIRE, 2021).

As described in **Section 3.4.2**, the Project Site is comprised primarily of relatively flat, developed land. The majority of the Project Site consists of the developed Pine Glen Golf Course and Singing Hills Hotel and an orchard and vineyard. The southern riparian woodland is located along the southwestern border of the Project Site and is disturbed by encroachment of invasive species and from maintenance of the Pine Glen Golf Couse directly east of the southern riparian woodland. This woodland with its understory vegetation could provide fuel for wildfires. However, no past wildfires have been reported on or in the immediate vicinity of the Project Site.

3.7.3 Impacts

Significance Criteria

Impacts associated with hazardous materials include a release of hazardous materials and improper hazardous material management. The Project would be considered to have significant hazardous material impacts if the Project Site had existing hazardous materials onsite that would require remediation or mitigation prior to development of the Project. Additionally, if the Project results in the use, handling, or generation of a controlled hazardous material that the regulated amount would increase the potential risk of exposure that results in the reduction in the quality or loss of life, then the Project would have a significant impact.

Impacts associated with wildfire include the construction or operation of the proposed development increasing wildfire risk in the immediate area. The Project would be considered to have a significant impact is it were to increase wildfire risk on-site or in the surrounding area. This includes, but is not limited to, increasing fuel loads, exacerbating the steepness of the local topography, introducing uses that would increase the chance of igniting fires, reducing fire barriers, inhibiting local emergency response to or evacuation routes from wildfires, building in a high-risk fire zone without project design measures to reduce inherent wildfire risk, and conflicting with a local wildfire management plan.

Hazardous Materials

As described in **Section 3.7.2**, with the exception of pesticide use associated with historic agricultural activities, there are no known RECs involving hazardous material contamination within the Project Site or one-mile radius. A Phase II investigation and soil sampling conducted in March 2023 verified that concentrations of organochlorine pesticides and arsenic were below the Health Risk-Based Mitigation Criteria for commercial/industrial users established by EPA. Additionally, the organochlorine pesticides levels were below Health Risk-Based Mitigation Criteria for residential uses established by EPA. Therefore, soil contamination from historic pesticide use is not considered to represent a human health risk to current or future users of the Project Site. Further, the Project would not result in export of soils from the Project Site**.** Described below are construction and operation-related impacts related to hazardous materials.

Construction

Hazardous materials used during construction may include gasoline, diesel fuel, motor oil, hydraulic fluid, solvents, cleaners, sealants, welding flux, various lubricants, paint, paint thinner, and other products. As with any liquid and solid, during handling and transfer from one container to another or general usage, the potential for an accidental release exists. Depending on the relative hazard of the material, if a spill were to occur of significant quantity, the accidental release could pose both a hazard to construction employees as well as to the environment. Construction BMPs are required through compliance with the USEPA NPDES General Construction Permit and often eliminate the impact of such accidental releases. Since contact with stormwater during construction is the primary means of transporting these contaminants offsite, appropriate BMPs for this impact are included in the construction stormwater BMPs in **Table 2.10-1**. With the implementation of these BMPs and compliance with federal laws relating to the handling of hazardous materials, no adverse effects associated with the accidental release would occur during construction.

Undiscovered contaminated soil could be present on the Project Site, but this is not anticipated because soil tests were completed throughout the Project Site, and only those discussed above were found. In the unlikely case that construction personnel do encounter contaminated soil of any type prior to or during earth-moving activities, a significant hazardous material impact would exist. However, the BMP listed in **Table 2.10-1** would minimize the possible hazards associated with existing contamination. Implementation of this BMP would further reduce the potential for the Project to result in significant adverse effects associated with hazardous materials.

Operation

The Project would utilize hazardous materials in varying quantities and capacities that would depend on the project component. The following describes the potential hazardous material risks from each major component of the Project.

The hazardous materials used for the classroom, dormitory facilities and offices, the new training facility and maintenance building of the Project would include, but are not limited to, motor oil, hydraulic fluid, solvents, cleaners, lubricants, paint, paint thinner, and other cleaning and maintenance chemicals. All hazardous materials would be stored, handled, and disposed of according to federal and manufacturer's guidelines. Waste would also be produced as a result of operation, but this waste would be usual for these types of facilities. For all solid waste produced on the site, manufacturer's guidelines would be followed for the storage, handling, and off-site disposal in addition to adhering to applicable federal and State regulations. Therefore, the Project would not result in significant adverse effects related to the production or use of hazardous materials.

The field components of the Project would include fertilizers, mowing equipment, and aeration equipment. Fuels or fertilizers could be released through spills, which has the potential to contaminate stormwater runoff or enter the surrounding groundwater through direct spilling or leaking into the surrounding soil. For all hazardous materials, manufacturer's guidelines would be followed for the storage, handling, and off-site disposal in addition to adhering to applicable federal and State regulations. Therefore, the Project would not result in significant adverse effects related to the use of hazardous materials.

Wildfire Risk

Construction Fire Ignition Risk

As described in **Section 3.7.2**, the County has experienced destructive wildfires and the Project Site is located within an area that is designated a Very High Fire Hazard Severity Zone. During construction, the operation of equipment could create sparks or fire that could ignite vegetation and lead to a wildfire if left unattended. Examples of construction equipment that could ignite a fire and thus increase risk include power tools and acetylene torches. However, the vegetation within the Project Site is well-maintained and has a low fuel potential, and paved and developed areas surrounding the Project Site, including the landscaped golf course, roads, and parking lots, would reduce the potential for fire to spread to off-site areas. Additionally, the implementation of the BMPs included in **Table 2.10-1** would reduce the probability of igniting a fire. These BMPs include the prevention of fuel being spilled and putting spark arresters on equipment with the potential to create sparks. Therefore, the potential for fire ignition during construction is less than significant.

Operation Fire Ignition Risk

As described in **Section 2.9**, the Project would be designed to adhere to Tribal standards equivalent to the International Building Code (IBC) that include measures related to fire and structural safety. Furthermore, there are tribal plans in place that reduce potential wildfire risk, such as the Forest Management Plan (enacted in March 2015) and the Brush Management Implementation Plan (enacted in February 2015). The Brush Management Implementation Plan specifically promotes on-Reservation fire safety. The Project would also not introduce new activities or development types that would increase the potential for fire risk. The retrofitted Singing Hills Hotel and additional facilities would continue to have similar fire risk as the existing hotel and would not introduce new or increased fire risk. Additionally, no increase in fuels would occur on the Project Site. The soccer fields proposed to replace the golf area on the Project Site would not be more prone to fire and would continue to act as a potential fire break. Furthermore, should a fire occur on the Project Site, fire response from fire protection personnel would be swift due to the close proximity of the two Sycuan Fire Department operated fire stations on the Reservation. Therefore, the potential for ignition of a wildfire during operation of the Project is less than significant.

Wildfire Evacuation

As discussed in **Section 3.7.2**, the County has a high fire risk and evacuation could be necessary if a wildfire were to occur near the Project Site. As discussed in **Section 3.12**, with implementation of the Project, total average daily traffic is anticipated to decrease under the Project, as a result of eliminating the hotel operations. Therefore, the Project would have a less-than-significant impact on existing evacuation routes and plans.

3.8 HYDROLOGY

3.8.1 Regulatory Setting

Federal

Clean Water Act

The Clean Water Act (CWA) (33 U.S. Code [USC] § 1251-1376), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." The U.S. Environmental Protection Agency (USEPA) is delegated as the administrative agency under the CWA. Relevant sections of the CWA include:

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Section 303(d) requires states to identify impaired off-Reservation water bodies, rank these impaired bodies based on severity of contamination and uses, and develop water quality management strategies, usually in the form of total maximum daily loads for the contaminant(s) of concern.
- Section 401 requires activities on trust land that may result in a discharge to waters of the U.S. to obtain a certification from the USEPA, or from the state for off-Reservation activities.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of pollutants (except for dredged or fill material) into waters of the U.S.

USEPA Construction General Permit

Construction activities disturbing one or more acres of soil must be covered under the NPDES Construction General Permit process. For tribal projects on trust land, the contractor proposing the project must submit a Notice of Intent to comply with the USEPA Construction General Permit. The USEPA's Construction General Permit also requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must list best management practices (BMPs) that address stormwater runoff rates and quality.

Safe Drinking Water Act

Under the Safe Drinking Water Act, the USEPA establishes legally enforceable National Primary Drinking Water Regulations (primary standards) that apply to public water systems. These standards are established to protect human health by limiting the levels of contaminants in drinking water. The USEPA also defines National Secondary Drinking Water Regulations (secondary standards) for contaminants that cause cosmetic and aesthetic effects, but not for health effects.

Federal Emergency Management Agency

The Disaster Relief Act of 1974 as amended by the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 created the Federal Emergency Management Agency (FEMA), which is responsible for determining flood elevations and floodplain boundaries based on U.S. Army Corps of Engineers (USACE) studies. FEMA is also responsible for distributing Flood Insurance Rate Maps, which are used in the National Flood Insurance Program. These maps identify the locations of special flood hazard areas, including 100-year floodplains.

State and Local

To provide context, State, and local policies applicable to off-Reservation areas only are presented below.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act establishes the authority of the SWRCB and nine Regional Water Quality Control Boards (RWQCB) in off-Reservation areas, and requires the State, through the SWRCB and the RWQCBs, to designate beneficial uses of surface waters and groundwater as well as specify water quality objectives designed to protect those uses.

Sustainable Groundwater Management Act

The California Sustainable Groundwater Management Act (SGMA; Water Code § 10720 et seq.) allows for the formation of groundwater sustainability agencies. The purpose of the agencies is to prepare and implement a plan for long-term groundwater sustainability.

San Diego County Grading Ordinance

The San Diego County Grading Ordinance (Title 8, Division 7 of the County Code) establishes off-Reservation provisions for public safety and environmental protection associated with grading, clearing, and watercourses.

San Diego County Hydraulic Design Manual

The San Diego County Hydraulic Design Manual establishes design standards and procedures for stormwater drainage and flood management facilities in off-Reservation areas of San Diego County. These design standards and procedures provide guidance to local jurisdictions, design engineers, developers, contractors, and others in the selection, design, construction, and maintenance of stormwater drainage and flood management facilities.

San Diego County Watershed Protection, Stormwater Management, and Discharge Control Ordinance

The County's updated Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO), adopted in January of 2016, regulates stormwater collection management in off-Reservation areas.

3.8.2 Environmental Setting

Surface Water

The Project Site contains facilities associated with the Singing Hills Golf Resort, including the hotel and associated parking, a portion of the Pine Glen golf course, a portion of the driving range, a man-made pond, and a service road connection to Willow Glen Drive. The man-made pond was constructed for ornamental purposes and is lined with plastic. An ephemeral riverine feature originates north of the Project Site and occurs parallel to the northwestern boundary until it joins the Sweetwater River south of the Project Site.

The mainstem of the Sweetwater River flows through Willow Lake, which was created by previous gravel mining. The river then passes through the Reservation, south of the Project Site, and flows off-Reservation to the Sweetwater Reservoir, followed by the Pacific Ocean.

Drainage

The Project Site is located within the San Diego Bay Watershed Management Area in the Sweetwater sub-watershed (Hydrologic unit 909). The San Diego Bay Watershed Management Area is the largest Watershed Management Area located entirely within the boundaries of San Diego County. The San Diego Bay Watershed Management Area also encompasses the Sweetwater River, Otay River, and Chollas Creek (Project Clean Water, 2023).

The Project Site slopes gently to the south. The golf course is relatively flat in contrast to hillsides to the north and west; however, it does contain some small hills for recreational purposes. Drainage on the Project Site generally travels to the south via sheet flow or collects into a network of both vegetated and cement channels that flow south to multiple outfalls above the Sweetwater River (**Appendix A-2**). The Project Site also receives stormwater flows from a triple 60" reinforced concrete pipe (RCP) culvert, which drains off-Reservation areas from the north.

The Federal Emergency Management Agency (FEMA) is responsible for predicting the potential for flooding in most areas. The majority of the Project Site is within an area with a 0.2% chance of flooding, also known as a 500-year floodplain (**Appendix A-2**). The 100-year floodplain occurs directly south of the Project Site and is associated with the Sweetwater River.

Water Supply

Potable water supply to Singing Hills Golf Course Resort, including the Project Site, is provided by a private potable water storage and distribution system fed by connections to the Otay Water District public water system (Dexter Wilson Engineering, Inc., 2023). The Otay Water District supplies imported water purchased from the San Diego County Water Authority and the Metropolitan Water District of Southern California (Otay Water District, 2023). The Otay Water District also purchases treated water from the Helix Water District. Potable water storage capacity as of July 2023 is 218.9 million gallons (Otay Water District, 2023). Non-potable water is supplied by groundwater wells on the Reservation and is used to provide irrigation and fire protection to the Project Site (Dexter Wilson Engineering, Inc., 2023).

3.8.3 Impacts

Significance Criteria

A project would have a significant adverse impact if development or operation would result in the destruction of water quality, substantial depletion of groundwater supply, substantial alteration of existing drainage patterns, substantial increase in surface runoff in a manner that would result in severe flooding, contribute runoff that would exceed capacity of existing or planned storm water drainage systems, or place structures within a 100-year FEMA floodplain.

Methodology

Assessment of potential impacts to water resources relied on previously gathered data, personal communication with Dexter Wilson Engineering, Inc., water demand data in **Appendix B**, and drainage data in **Appendix A**.

Stormwater, Drainage, and Flooding

Impacts to surface water quality from potential discharge of pollutants during construction would be minimized with adherence to the NPDES permitting program and implementation of a SWPPP, which would include BMPs to reduce erosion and protect water quality. BMPs are listed in **Table 2.10-1** and would reduce impacts to a less-than-significant level.

Drainage on the Project Site generally travels to the south via sheet flow or collects into a network of both vegetated and cement channels that flow south to outfalls above the Sweetwater River. Proposed drainage improvements would mimic these conditions routing stormwater south through the Project Site. Stormwater from existing hotel buildings and parking areas would be collected and conveyed in a new storm drain system under the natural soccer fields to a new off-site detention basin adjacent to the southern Project Site boundary. Drainage from the artificial turf fields, training facility, basketball court and driveway connecting to Willow Glen Drive will be collected and routed through a new storm drain system to a stormwater treatment BMP in the area of the relocated driving range, prior to discharging to the new off-site detention basin. Fields will be pervious with underlying subdrains to ensure proper field conditions. Off-site drainage improvements have been designed to address an increase in impervious surfaces and 100-year stormwater flows and are shown in **Appendix A-1**. The environmental impacts from off-site improvements are discussed in **Section 3.13**.

The Project Site is located outside of the 100-year floodplain and thus would not displace portions of the floodplain or introduce incompatible uses (**Appendix A-2**). For these reasons, impacts to the floodplain would be less than significant.

Groundwater Supply

The Project would result in an increased potable water demand of 5,353 GPD and a decreased non-potable demand of 7,030 GPD (**Table 3.8-1**). Potable water would be supplied by the Otay Water District which imports water from multiple sources and groundwater basins, while non-potable demands would be supplied by groundwater on the Reservation.

Table 3.8-1: Existing and Proposed Average Water Demand

Type	Existing Demand	Project Demand	Project Impact	Percent Increase/Decrease
Potable	11,500 GPD	16,853 GPD	5,353 GPD (increase)	46.5% (increase)
Non-Potable	31,730[1] GPD	24,700[2] GPD	7,030 GPD (decrease)	22.2% (decrease)

Source: **Appendix B**

[1]Non-potable use consists of 16.7 acres of golf course irrigation.

[2]Non-potable use consists of 13.0 acres of new field and landscaping irrigation.

The overall increase in potable water demand is negligible in comparison to water demands within the affected groundwater basins (the groundwater basin underlying the Reservation and the groundwater basins of imported water sources) and increases in potable water use would be coordinated with Otay Water District. The Project includes approximately 2.1 acres of new impervious surfaces. Natural soccer fields are part of the Project and would allow for continued groundwater recharge on the Project Site. Based on the level of demands and level of development, the Project would not result in substantial depletion of groundwater resources; thus, impacts are considered less than significant.

3.9 LAND USE

3.9.1 Regulatory Setting

Tribal

Land use on the Project Site and adjacent lands to the west, south and east is regulated and governed by the Tribe. The Tribe has enacted several ordinances and plans that govern land use and building practices, amongst other key items, to ensure tribal growth and protection of natural resources on-Reservation are responsibly coordinated. The Sycuan Natural and Cultural Resources Management Plan (NRMP), enacted in June 2011, serves similar purposes on-Reservation that the County Multiple Species Conservation Plan (MSCP) and General Plan serve off-Reservation, and contains a tribal equivalent of the County Biological Mitigation Ordinance. The NRMP designates three basic land uses on the Reservation by land classification: development areas (approximately 42%), preservation areas (approximately 8%), and conservation areas (approximately 50%). The Project Site and adjacent lands to the east and south are designated as "Developed Areas" in the NRMP. Developed Areas are collectively defined as lands within the Plan Area that were currently developed or urbanized or were approved by the Tribe for development as of the effective date of the NRMP. Activities within Developed Areas are excluded from the habitat and natural resource management provisions and requirements for habitat off-sets, as improvement or construction activities would occur to already impacted and developed habitat.

Other relevant tribal plans include: the Forest Management Plan, enacted in March 2015, which primarily protects riparian corridors, and the Brush Management Implementation Plan, enacted in February 2015, which is aimed at promoting on-Reservation fire safety. These documents and others, while not directly applicable to impacts associated with the Project, demonstrate the Tribe's commitment to environmentally responsible growth commensurate with surrounding governments.

Federal

Farmland Protection Policy Act

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. It assures that federal programs are administered in a matter that is compatible with state and local units of government, and private programs and policies to protect farmland (7 U.S.C. § 4201).

The Natural Resource Conservation Service (NRCS) is responsible for the implementation of the FPPA and categorizes farmland in a number of ways. These categories include prime farmland, farmland of statewide importance, and unique farmland. Prime farmland is considered to have the best possible features to sustain long-term productivity. Farmland of statewide importance includes farmland similar to prime farmland, but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Unique farmland is characterized by inferior soils and, depending on climate, generally needs irrigation.

State and Local

Land use on the Project Site is regulated and guided by the Tribe (see discussion above). Land use planning for off-Reservation lands in the vicinity of the Project Site is guided by the County of San Diego General Plan, County Zoning Ordinance, and the Crest/Dehesa/Harbison Canyon/Granite Hills Community Plan.

3.9.2 Environmental Setting

Project Site

The Project Site is located in the southwestern area of San Diego County, approximately 13 miles east of downtown San Diego near El Cajon in the Dehesa Valley/Crest area (**Figure 1.2-1**). The Project Site and existing Singing Hills Golf Resort are located within the northwestern portion of the Reservation, southeast of the intersection of Dehesa Road and Willow Glen Drive. The Project Site is located entirely within Tribal trust land currently developed with the Pine Glen Golf Course and Singing Hills Hotel (**Figure 1.2-1** and **Figure 1.2-3**). The Project Site is relatively flat, developed land at an elevation of approximately 490 feet amsl, with gentle hills, slopes and mature trees that have been incorporated into the existing golf course landscape.

Project Area Setting

Surrounding the Project Site are narrow segments of undeveloped lands and public roadways. Lands directly north of the Project Site across Dehesa Road are undeveloped open space. To the west are residential developments and single-family homes, interspersed with undeveloped slopes. The Singing Hills Golf Resort, as well as single-family homes overlooking the golf course, continue to the south and southeast of the Project Site. The Sweetwater River is located directly south of the Project Site.

Agriculture

The U.S. Department of Agriculture (USDA) conducts a state-by-state census of agriculture every five years. The National Agriculture Statistical Service (NASS) collects census data from a list of all known potential agriculture operators. The census reports on various statistics relating to crop yields, farm acreage, and farm economics. According to the *2017 Census of Agriculture*, a total of 222,094 acres in San Diego County are used for farming purposes. The average per-farm market value of agricultural products sold by the 5,082 farms in County in 2017 was approximately $163,601 (NASS, 2017).

3.9.3 Impacts

Significance Criteria

Land use impacts would be significant if the Project results in conflicts with surrounding land uses, is inconsistent with applicable tribal ordinances and plans, or would inhibit the implementation of regional, state and local land use plans for surrounding areas. Significant land use impacts may also occur if the Project would convert a significant amount of Prime Farmland or Farmland of Statewide/Local/Unique Importance to other uses, as determined by the Farmland Protection Policy Act (FPPA).

Methodology

The following analysis identifies potential off-Reservation environmental impacts of the Project related to land use. The impact analysis compares existing conditions described above to foreseeable changes to existing conditions that would be likely to result from implementation of the Project. The evaluation of off-Reservation environmental impacts included field observations and review of site plans for the Project.

Land Use Impacts

Land Use Conflicts

The Project would include the development of a Professional Soccer Training Facility and Youth Academy Training campus within tribal trust land currently developed with the Pine Glen Golf Course and Singing Hills Hotel. County regulations do not apply to land development on the Project Site given that the land is held in federal trust status for the Tribe. As discussed in **Section 3.9.1**, the Project Site and adjacent lands to the east and south are designated as "Developed Areas" in the Tribe's NRMP, which governs the protection of natural resources within the Reservation. Activities within Developed Areas are excluded from the habitat and natural resource management provisions and requirements for habitat off-sets, as improvement or construction activities would occur to already impacted and developed habitat. Further, the Project would not change the current recreational nature of the Project Site; rather it would expand and modify this existing use.

As described above, the areas immediately adjacent to the Project Site are developed with residential and open space land uses. The Project would not physically disrupt neighboring land uses or prohibit access to neighboring parcels. While the proposed uses within the Project Site are not similar in nature to the uses immediately surrounding the Project Site, the Project's land uses would be similar to recreational land uses in the vicinity of the Project Site.

Existing sensitive land uses in the vicinity of the Project Site include on-Reservation condominiums located approximately 1,000 feet to the east of the Project Site; on-Reservation golf course facilities including a driving range within and adjacent to the Project Site and the Willow Glen golf course approximately 250 feet to the south of the Project Site; and off-Reservation single-family residences located approximately 375 feet west of the Project Site. Potential conflicts may include air quality, noise, and traffic impacts from construction activities (**Section 3.3**, **Section 3.10**, and **Section 3.12** respectively), visual effects and an increase in lighting (**Section 3.2**). Implementation of BMPs identified in **Table 2.10-1** for air quality, noise, traffic, and visual resources, as well as mitigation measures identified in **Table 4-1,** would reduce potential adverse impacts to less-than-significant levels.

The Project would be largely consistent with applicable Tribal land use plans and would not inhibit the implementation of County land use plans, policies, and regulations for lands in the vicinity of the Project Site. With implementation of mitigation as described above, the Project would not result in significant off-Reservation land use consistency conflicts. This impact is less than significant.

Airport Compatibility

The nearest airport to the Project Site is Gillespie Field airport, which is located approximately 4.3 miles to the west of the Project Site. Accordingly, the Project Site is not located within any airport compatibility zones. Therefore, Alternative A would not result in land use incompatibility with the nearby airport.

Agriculture

The National Resources Conservation Service (NRCS) characterizes the soils on the Project Site as "Prime Farmland if irrigated", "Farmland of Statewide Importance", and "Not Prime Farmland" (USDA, 2023); however, there are no historic or current farming operations on the site nor infrastructure that would support land cultivation. Development and operation of Alternative A would not preclude agricultural uses on adjacent parcels. Because the Project Site has not previously been used for agriculture, has no infrastructure to support agriculture, and is less than 0.001% of the total amount of prime farmland, unique farmland, and farmland of statewide or local importance in the County (NASS, 2017), effects to agricultural resources would be less than significant.

3.10 NOISE

3.10.1 Regulatory Setting

Federal

Noise Standards

The Federal Highway Administration (FHWA) establishes construction noise level thresholds, which are listed in **Table 3.10-1**. **Table 3.10-2** shows the Federal Noise Abatement Criteria Hourly A-Weighted Sound Level Decibels. 23 CFR 772 establishes Noise Abatement Criteria (NAC) for various land uses that have been categorized based upon activity. Land uses are categorized on the basis of their sensitivity to noise as indicated in Table 6. The federal NAC is based on peak traffic hour noise levels.

Table 3.10-1: Federal Construction Noise Thresholds

Noise Receptor Locations and Land Uses	Daytime (7 am - 6 pm)	Evening (6 pm - 10 pm)	Nighttime (10 pm - 7 am)
	dBA, Leq[1]		
Noise-Sensitive Locations (residences, hotels, etc.)	72 or Baseline + 5 (whichever is louder)	Baseline + 5	Baseline + 5 (if Baseline < 70) or Baseline + 3 (if Baseline > 70)
Commercial Areas (businesses, etc.)	77 or Baseline + 5	None	None
Industrial Areas (factories, etc.)	82 or Baseline + 5	None	None

Notes: [1] Leq thresholds were empirically determined (FHWA, 2006).
Source: FHWA, 2006.

Vibration Standards

Table 3.10-3 summarizes the Federal Transportation Administration's (FTA) guideline vibration damage criteria for various structural categories. As shown therein, buildings extremely susceptible to vibration damage could be damaged if vibration levels exceed 90 VdB. Additionally, although humans have a perceptibility threshold of 65 VdB, human response to vibration is not usually significant unless the vibration exceeds 70 VdB (FTA, 2006). Background vibration velocity in residential areas is usually 50 VdB or lower.

Table 3.10-2: Federal Noise Abatement Criteria Hourly A-Weighted Sound Level Decibels

Activity Category	Activity Criteria Leq (h), dBA	Evaluation Location	Activity Category Description
A	57	Exterior	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B	67	Exterior	Residential.
C	67	Exterior	Active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, daycare centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings.
D	52	Interior	Auditoriums, daycare centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or non-profit institutional structures, radio studios, recording studios, schools, and television studios.
E[1]	72	Exterior	Hotels, motels, offices, restaurants/bars, and other developed lands, properties or activities not included in A-D or F.
F	--	--	Agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, shipyards, utilities (water resources, water treatment, electricity), and warehousing.
G	--	--	Undeveloped lands that are not permitted.

Notes: Includes undeveloped lands permitted for this activity category.
Source: 23 CFR 772

Table 3.10-3: Construction Vibration Damage Criteria

Building Category	Approximate PPV (in/sec)	Approximate Lv (VdB)
Reinforced-concrete, steel, or timber (no plaster)	0.5	102
Engineered concrete and masonry (no plaster)	0.3	98
Non-engineered timber and masonry buildings	0.2	94
Buildings extremely susceptible to vibration damage	0.12	90

Source: FTA, 2006

State and Local

San Diego County General Plan

While County noise thresholds are not applicable to on-Reservation development, the following discussion is provided for context. County noise thresholds for off-Reservation construction are 75 dBA Leq for an eight-hour period between 7 am and 7 pm when measured at the boundary line of a property where the noise source is located or on any occupied property where the noise is being received. CNEL is the equivalent sound level for a 24-hour period with a +5 dB weighting applied to sound occurring between 7 pm and 10 pm and a +10 dB weighting applied to sound occurring between 10 pm and 7 am CNEL is expressed in the A-weighting frequency scale. For operational noise levels, San Diego County thresholds for off-Reservation areas are as follows:

- For Residential – single family residences an acceptable exterior noise level is 60 Community Noise Equivalent Level (CNEL)
- For Residential – multi-family residences an acceptable exterior noise level is 65 CNEL
- For Transient Lodging – motels, hotel, resorts an acceptable exterior noise level is 65 CNEL
- For Office/Professional – government, medical/dental, commercial, retail, laboratories an acceptable exterior noise level is 70 CNEL

3.10.2 Environmental Setting

The dominant noise sources in the vicinity of the Project Site consist of traffic on local. Adjacent off-Reservation roadways to the Project Site include Dehesa Road to the north and Willow Glen Drive to the west. The estimated ambient noise level (assumed to be primarily due to traffic noise) in the vicinity of the Project Site is approximately 55 dBA equivalent continuous sound pressure level (L_{eq}) over a 24-hour period (Department of Transportation, 2022).

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically involved. Residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, and parks and other outdoor recreation areas generally are more sensitive to noise than commercial or industrial land uses. A sensitive receptor is defined as any living entity or aggregate of entities whose comfort, health, or well-being could be impaired or endangered by the existence of the criteria pollutant, whether it is emissions or noise, in the atmosphere.

Existing sensitive noise receptors in the vicinity of the Project Site include on-Reservation condominiums located approximately 1,000 feet to the east of the Project Site; on-Reservation golf course facilities including a driving range within and adjacent to the Project Site and the Willow Glen golf course approximately 250 feet to the south of the Project Site; and off-Reservation single-family residences located approximately 375 feet west of the Project Site.

3.10.3 Impacts

Significance Criteria

An ambient noise level of 75 dBA, equivalent continuous sound level (L_{eq}) is generally considered to be acceptable during construction (Federal Highway Administration, 2006). San Diego County noise thresholds for off-Reservation construction are similarly 75 dBA L_{eq} for an eight-hour period between 7 am and 7 pm. The 23 CFR 772 Noise Abatement Criteria (NAC) provides an operational noise threshold of 67 A-weighted decibels (dBA), L_{eq} for projects located near residential land uses.

Construction Noise

Noise within the Project Site during construction would result from equipment, earth-moving activities, and vehicle traffic, which consists of trucks hauling materials and workers entering and exiting the Project Site. Construction would result in temporary periods of elevated noise levels, typically generating maximum noise levels up to 85 dBA at a distance of 50 feet, as indicated in **Table 3.10-4**. These noise levels may vary depending on the type, number, and duration of use of construction equipment.

Table 3.10-4: Typical Construction Noise Levels

Construction Equipment	Maximum Noise Level at 50 ft (dBA)	Construction Equipment	Maximum Noise Level at 50 ft (dBA)
Crane (mobile or stationary)	83	Concrete Mixer	85
Dozer	85	Generator	82
Compactor	82	Backhoe	80
Grader	85	Air compressor	80
Paver	85	Loader	80
Scraper	85	Scraper	85
Concrete pump truck	82	Dump truck	84

Source: FTA, 2018

During construction, a maximum of approximately 74 worker and vendor truck trips would occur per day. Material haul trips have the potential to raise ambient noise levels along haul routes, depending on the number of haul trips made and the types of vehicles used. It is estimated that 21 material hauling trips would occur each day during construction. Because trucks are louder than passenger cars, a passenger car equivalence (PCE) multiplier of 10 cars per truck was used to assume 200 PCE material hauling trips per day. With the addition of worker and vendor vehicle trips, the estimated equivalent total trips added to area roadways would be 274 vehicle trips. The majority of truck trips would occur during the day and outside the traffic peak hours. The increase noise due to construction traffic would be temporary, and construction-related trips are minor compared to existing traffic. Existing traffic volumes on Dehesa Road (16,500 average daily trips) are far greater than the 140 trips added by the construction. Therefore, construction traffic would not result in a significant increase in the existing ambient noise level.

Noise from stationary sources, such as construction equipment, attenuates (lessens) at a rate of 6–9 dBA per doubling of distance from the source, depending on environmental conditions (e.g., atmospheric conditions, noise barriers). An attenuation factor of 6 dBA per doubling of distance is appropriate for the Project Site given the relatively flat topography between the Project Site and the sensitive receptors nearby (FTA, 2018). Assuming up to three of the loudest pieces of equipment operating at one time, the highest noise level would be 85 dBA. Based on the estimates of construction noise described above, the maximum construction noise level would be up to 67.5 dBA at the nearest off-reservation sensitive receptors, which are 375 feet or more from the Project Site. Eight-hour average noise levels would be less as mobile equipment would move around, thereby increasing the distance to the acoustic center of the site. There would also be work breaks and idle time, and not all equipment would be used simultaneously.

The maximum construction noise that could be heard at the nearest sensitive receptors is under the County continuous noise threshold of 75 dBA. The construction noise level would be below the federal noise construction threshold of 78 dBA for residences. The further the construction noise travels, the more it will decrease due to attenuation and therefore not cause additional adverse effects to other sensitive receptors further away compared to the nearest sensitive receptor. Construction noise BMPs identified in **Table 2.10-1** would reduce noise during construction activities and would limit construction to daytime hours to reduce the potential for sleep disturbance, which is consistent with the County's Noise Ordinance. Therefore, because of the short term and temporary nature of construction noise, and implementation of BMPs to reduce construction noise levels to the extent feasible, impacts associated with noise due to construction would not be significant. There would be a less-than-significant impact.

Construction Vibration

The vibration levels of typical construction equipment at a distance of 25 feet from the equipment are shown in **Table 3.10-5**. With the exception of vibratory rollers, vibrations associated with construction equipment are below the thresholds for structural damage (90 vibration velocity [VdB]) at a distance of 25 feet; however, vibration levels associated with all the equipment in **Table 3.10-5** are above the threshold for annoyance of humans at a distance of 25 feet.

Table 3.10-5: Vibration Levels for Construction Equipment

Vibration Source	Approximate Vibration Level (VdB) at 25 ft
Vibratory Roller	94
Large Bulldozers	87
Loaded Trucks	86
Jackhammer	79

Source: FTA, 2018

The threshold of perception for humans is approximately 65 VdB while a vibration level of 85 VdB in a residence can result in strong annoyance (FTA, 2018). The nearest off-reservation residential receptor is approximately 375 feet to construction. Excessive vibration is usually only an issue when construction requiring the use of equipment with high vibration levels (compactors or large dozers) occurs within 25 to 100 feet of a structure. Construction activity would occur beyond 100-feet from the nearest residential structure. Therefore, vibration associated with construction would not have a significant adverse effect on nearby sensitive receptors. There would be a less-than-significant impact.

Operation Noise

The level of traffic noise is dependent on three variables: (1) volume of traffic, (2) speed of traffic, and (3) number of trucks in the flow of traffic. Traffic speed or the mix of trucks in the area would not significantly change during the operational phase; further, implementation of the Project is expected to result in an overall reduction in traffic volumes as result of the elimination of hotel operations (refer to **Section 3.12** for additional details). As discussed above, the primary traffic stressors and producers of noise occur along Dehesa Road. The Project would not add significant additional trips to this segment during peak hour. As operational trips would less than double traffic on nearby roadways, any potential increase in ambient noise levels would be less than 1.0 dBA and Federal Interagency Committee on Noise (FICON) thresholds for ambient noise increase would not be exceeded. Therefore, the Project would not result in significant impacts associated with traffic noise.

Operation of the Project could have the potential to increase the ambient noise level due to roof-mounted units associated with the building heating, ventilation, and air conditioning (HVAC) system of the proposed training facility building. The HVAC equipment would have noise shielding and other industry-standard noise abatement measures installed. The Project Site currently contains these systems, thus the projected noise levels associated with HVAC system would not significantly differ from current noise levels.

Noise from operation and maintenance of the youth academy school and training facilities are expected to be similar to the current noise levels generated by the Singing Hills Hotel and Pine Glen Golf Course. Additionally, the sports fields would not be utilized at all times, and would not typically be active later

than 7pm. Therefore, operational noise levels from on-site activities would not result in significant impacts associated with the off-site ambient noise environment.

Operation Vibration

Recreational uses do not include sources of perceptible vibration. Therefore, the Project would not result in vibration and noise levels at nearby sensitive receptors and would not exceed the federal noise abatement criteria. There would be no impact.

3.11 PUBLIC SERVICES

3.11.1 Regulatory Setting

Federal

Clean Water Act and Safe Drinking Water Act

The Clean Water Act and Safe Drinking Water Act are described in detail in **Section 3.8.1**.

Public Law 280

Public Law 83-280 (Public Law 280) was enacted in 1953 and delegated federal criminal jurisdiction to certain states for offenses involving tribal members in Indian Country in addition to permitting civil litigation involving tribal members to be heard in state courts. In six states, the transfer was mandatory unless a specific tribe in one of these states was excluded from the change while other states volunteered, such as Washington State. There were no tribes excluded in California. The federal government relinquished all special criminal jurisdictions over Indian offenders and victims in these states. However, Public Law 280 does not grant states any civil-regulatory authority over lands held in federal trust for tribes.

3.11.2 Environmental Setting

Water Supply

Potable water supply to the Singing Hills Golf Resort is provided by the Otay Water District. Non-potable water and fire flow is provided privately by the Tribe. The water supply setting is described in detail in **Section 3.8.2**.

Wastewater Service

Wastewater service to the Singing Hills Golf Resort, which includes the Project Site, is provided by an on-site collection system that conveys wastewater into the Otay Water District public sewer system. Existing 8-inch public gravity sewer lines occur in easements within the Project Site. The existing hotel is served by public gravity sewer lines that convey wastewater south to a public sewer line on the Reservation (Dexter Wilson Engineering, Inc., 2023).

Solid Waste

Republic Services, Inc. provides solid waste disposal services to the Reservation, including the Project Site. Solid waste is collected and hauled to the Sycamore Landfill approximately 10 miles northwest of the Reservation. The Sycamore Landfill is a Class III landfill with a permitted disposal area of 149.2 acres. The landfill processes 3,965 tons of waste daily, has a remaining capacity of 113,972,637 cubic yards, and is projected to reach capacity in 2042 (CalRecycle, 2016). The Tribe funds the Sycuan Casino Green Team to assist with e-waste and recycling on the Reservation. The Green Team has recycled over 290 tons of mixed recyclables on the Reservation (Sycuan, 2023b).

Electricity, Natural Gas, and Telecommunications

San Diego Gas & Electric Company supplies electricity and natural gas services to the Project Site. Telephone, cable television, and internet services are available from Cox Communications. Various satellite companies also provide television service to the area.

Law Enforcement

The San Diego County Sheriff's Department provides law enforcement services to unincorporated areas of San Diego County surrounding the Reservation. The California Highway Patrol (CHP) provides traffic-related services to these areas and to roads leading to the Reservation. The Sycuan Tribal Police Department (STPD) provides primary protection and safety services to the Reservation. Calls for assistance are dispatched through the 911 emergency services system. STPD are sworn officers that are cross commissioned with the Bureau of Indian Affairs (BIA) Office of Law Enforcement Services. STPD operates in collaboration with the San Diego Sheriff's Department and CHP and assists CHP in monitoring the roads in the vicinity of the Reservation. STPD and CHP work together to ensure that traffic control is in place for special events. Depending on the type of crime (pursuant to Public Law 280), U.S. Marshals may provide support in specified situations on tribal land.

The Tribe has executed formal agreements memorializing partnerships with the San Diego County District Attorney's Office, the San Diego County Sheriff's Department, and the BIA. STPD's sworn officers are authorized to enforce State and federal criminal law as well as Tribal law (Sycuan, 2019). The MOU also allows STPD to assist off-Reservation when requested by other agencies.

Fire Protection and Emergency Medical

The Sycuan Fire Department (SFD) provides fire protection and emergency medical services to the Reservation and was established in 1974 with the assistance of the San Diego Office of Fire Service, the Alpine Fire Protection District, the California Department of Forestry and Fire Protection (CAL FIRE), and the BIA. SFD operates under a contract with the BIA, which authorizes Indian tribes to contract and operate federal service programs within the BIA (BIA, 2023). SFD also has an agreement with CAL FIRE for wildland fires and an agreement for mutual aid with the County, Crest, San Miguel, and Alpine Fire Departments. SFD also provides emergency response support to the surrounding communities of Dehesa Valley, Harbison Canyon, Alpine, Jamul, Jacumba, and Boulevard. SFD operates from two fire stations on the Reservation: one station for the municipal fire crew and the other for the wildland/hotshot crew.

3.11.3 Impacts

Significance Criteria

A project would have a significant adverse impact if development or operation were to result in significant impacts to off-Reservation public service providers. The assessment of potential impacts relied on current data, personal communication with Dexter Wilson Engineering, Inc., previous environmental documents, and data in **Appendices B and C**.

Water Supply

Existing and proposed average water demand for potable water uses are shown in **Table 3.8-1**. Average potable water demand of the Project would be approximately 16,853 gallons per day (GPD). Compared to existing average potable water demand, the Project would result in an increase of approximately 5,353 GPD. The off-Reservation facilities are sized based on larger fire flow requirements and capacity is significantly higher than the total demand of the Project (Dexter Wilson Engineering, Inc., 2023). The connection to Otay Water District for fire flow redundancy would not increase average water demands as fire flow would be used only for emergency events. The Project will be required to coordinate with Otay Water District to connect potable and fire flow water lines within the Willow Glen Drive right-of-way. The potential environmental impacts resulting from the construction of these off-site connections are described in **Section 3.13**. The overall increase in water demand is negligible in relation to Otay Water District's overall water system demands and thus this impact would be less than significant.

Wastewater

Wastewater service for the existing hotel on the Project Site is provided by an on-site collection system that conveys wastewater into the Otay Water District public sewer system. To accommodate the Project, new wastewater lines would be established which would convey flows to an off-site lift station in the area of the relocated driving range. The potential environmental impacts resulting from the construction of these off-site improvements are described in **Section 3.13**.

Existing and proposed average wastewater generation rates are shown in **Table 3.11-1**. Average wastewater generation of the Project would be approximately 14,428 gallons per day (GPD). Compared to existing wastewater generation, the Project would result in an increase of approximately 3,503 GPD. The overall increase in wastewater demand is negligible in relation to Otay Water District's overall wastewater system demands (Dexter Wilson Engineering, Inc., 2023) and thus this impact would be less than significant impact.

Table 3.11-1: Existing and Proposed Average Wastewater Demand

Existing Generation	Project Generation	Increase of Project	Percent Increase
10,925 GPD	14,428 GPD	3,503 GPD	32.0%

Source: **Appendix B**

Solid Waste Service

Solid waste materials generated during construction and operation would be typical of construction sites and sports facilities and would be collected by Republic Services, Inc. Solid waste generated from construction would be temporary and taken to off-Reservation facilities that would recycle materials consistent with State diversion goals. Solid waste from operations is anticipated to increase slightly with the addition of the new training building. Solid waste from existing hotel buildings is anticipated to be similar to existing conditions as these facilities are being repurposed from hotel rooms to school and dormitory facilities. The Sycamore Landfill has a remaining capacity of 113,972,637 cubic yards, which is more than sufficient to accommodate solid waste from the Project. Additionally, the Tribe funds a recycling program on the Reservation to further reduce solid waste. The Project would not significantly affect the remaining capacity of the landfill and thus there would be a less-than-significant impact.

Electricity, Natural Gas, and Telecommunications

Construction on the Project Site could physically impact underground utilities; however, per BMPs listed in **Table 2.10-1**, the State Utility Notification Center shall be contacted prior to construction to notify utility service providers of excavation. Energy demand from operations is anticipated to increase somewhat with the addition of the new training building and sports field lighting but represents a small fraction of overall public utility demands. Energy demand from existing hotel buildings is anticipated to be similar to existing conditions as these facilities are being repurposed from hotel rooms to school and dormitory facilities. Renovations may improve overall energy efficiency with more efficient lighting and appliances. Increases in electricity, natural gas, and telecommunications are anticipated to be negligible in relation to overall utility demands and thus there would be a less-than-significant impact.

Law Enforcement, Fire Protection, and Emergency Medical Services

Project operations are not expected to generate a significant increase in the number of calls for law enforcement, fire protection or emergency medical services above the current demands of the existing Singing Hills Hotel, which would be closed and repurposed under the Project. Further, as discussed in more detail in **Section 3.12.3**, the Project is anticipated to result in an overall decrease in traffic levels compared to the operations of the existing hotel, and thus the potential for traffic violations and incidents and associated law enforcement and EMS services would decrease. As discussed in more detail in **Section 3.7.3**, the Project would not result in a significant increase in wildfire ignition risk. Therefore, the Project would not result in the need for new off-Reservation police, fire, or emergency medical facilities and impacts would be less than significant.

3.12 TRANSPORTATION AND CIRCULATION

3.12.1 Regulatory Setting

The Project Site is located on tribal trust land and is therefore not subject to state or local guidelines, rules or controls concerning transportation and traffic. In off-Reservation areas, Caltrans is responsible for the design, construction, maintenance, and operation of the California State Highway System. The San Diego County General Plan Mobility Element contains policies relevant to off-Reservation transportation and traffic conditions.

3.12.2 Environmental Setting

Transportation Networks

Regional access to the Project Site is provided by SR-54 and Interstate 8 (I-8). SR-54 runs in a general south-north direction and is located west of the Project Site while I-8 runs in an east-west direction and is located north. Local access to the Project Site is currently provided through three different driveways located on Dehesa Road and a service driveway from Willow Glen Drive. Dehesa Road is adjacent to the northern and eastern borders of the Project Site while Willow Glen Drive is adjacent to the western border.

There are two major roadways in the vicinity of the Project Site:

- Dehesa Road is classified as a 4.1B Major Road in the County General Plan Mobility Element and is currently constructed as a two-lane undivided roadway with intermittent turn lanes. Sidewalks are provided east of the Singing Hills Golf Resort on the south side only. Class II bike lanes are provided on both sides of the roadway. The posted speed limit is 50 mph.
- Willow Glen Drive is classified as a 2.1C Community Collector in the County General Plan Mobility Element and is currently constructed as a two-lane undivided roadway with intermittent turn lanes. No sidewalks are provided within the study area. Class II bike lanes are provided on both sides of the roadway. The posted speed limit is 45 mph.

The nearest signalized intersection is at the Dehesa Road/Willow Glen Drive intersection, and it provides a controlled crossing location with pedestrian push buttons and crosswalks.

The nearest bus stops are approximately 3 miles away along Jamacha Road/SR-54 within the City of El Cajon. These bus stops are served by Metropolitan Transit Service bus route 875 that runs from the El Cajon Transit Center. Metropolitan Transit Service bus route 875 runs along Jamacha Road, Washington Avenue, Broadway, and E Main Street with 30-minute headways during the weekdays and 1-hour headways on Saturday and Sunday. Appendix G of **Appendix F** contains the bus route schedule and map.

Existing Traffic Volumes

Peak hour intersection turning movement and street segment average daily traffic (ADT) volume counts were conducted as part of the 2023 Traffic Impact Analysis (TIA) prepared for the Project (**Appendix F**). Average daily and peak hour traffic counts were conducted on Wednesday, May 24, 2023, while schools were in session at the following facilities:

Intersections

1. Dehesa Road / Willow Glen Drive.
2. Dehesa Road / Project Driveway #1.
3. Dehesa Road / Singing Hills Driveway.
4. Dehesa Road / Sloane Canyon Road.
5. Willow Glen Drive / Project Driveway #2.

Street Segments

1. Dehesa Road between Willow Glen Drive and Singing Hills Driveway.
2. Dehesa Road between Singing Hills Driveway and Sloane Canyon Road.
3. Willow Glen Drive south of Dehesa Road.

Table 3.12-1 provides a summary of the average daily traffic volumes on the street segments, and Figure 3–2 in **Appendix F** shows the existing traffic volumes (Appendix A of **Appendix F** contains the manual count sheets).

Table 3.12-1: Existing Traffic Volumes

Street Segment	Average Daily Traffic
Dehesa Road	
Willow Glen Drive to Singing Hill Driveway #3	16,500
Singing Hill Driveway #3 to Sloane Canyon Road	15,390
Willow Glen Drive	
South of Dehesa Road	8,760

Source: **Appendix F**

Level of Service

Level of service (LOS) is the term used to denote the different operating conditions that occur on a given roadway segment under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis taking into account different factors, such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. LOS provides an index to the operational qualities of a roadway segment or an intersection. Level of service designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. Level of service designation is reported differently for signalized and unsignalized intersections, as well as for roadway segment.

Signalized intersections were analyzed under AM and PM peak hour conditions. Average vehicle delay was determined utilizing the methodology found in Chapter 19 of the Highway Capacity Manual (HCM) 6th Edition, with the assistance of the Synchro (version 11) computer software. The delay values (represented in seconds) were qualified with a corresponding intersection LOS. Unsignalized intersections were analyzed under AM and PM peak hour conditions. Average vehicle delay and LOS was determined based upon the procedures found in Chapters 20 and 21 of the HCM 6th Edition, with the assistance of the Synchro (version 11) computer software. As shown in **Table 3.12-2**, all intersections are currently operating at LOS C or better with exception of the northbound left-turn movement at the Dehesa

Rd/Sloane Canyon Rd intersection that is LOS E for the PM peak hour (Appendix C of **Appendix F** contains the analysis worksheets).

Table 3.12-2: Level of Service for Intersection - Existing

Intersection	Control Tryp	Peak Hour	Delay	LOS
1. Dehesa Rd/Willow Glen Dr	Signal	AM	17.0	B
		PM	21.5	C
Dehesa Rd/ Project Driveway #1 (main entrance – currently gated)	Two-way stop controlled intersection	AM	0.0	A
		PM	0.0	A
Dehesa Rd/Singing Hills Driveway	Right-In only	AM	0.0	A
		PM	0.0	A
Dehesa Rd/Sloane Canyon Rd	Two-way stop controlled intersection	AM	15.7	C
		PM	44.0	E
Willow Glen Dr/Project Driveway #2 (service access only)	Does not exist	AM	–	–
		PM	–	–

Source: **Appendix F**

Table 3.12-3 summarizes the existing daily street segment operations. As shown in **Table 3.12-3**, Willow Glen Dr is currently operating at LOS C south of Dehesa Rd. Dehesa Rd is currently operating at LOS E between Willow Glen Dr and Sloane Canyon Rd.

Table 3.12-3: Level of Service for Roadway Segments – Existing

Street Segment	Function Classification	Capacity (LOS E)	Average Daily Traffic	LOS	V/C
Dehesa Road					
Willow Glen Drive to Singing Hill Driveway #3	2.1C Community Collector with Intermittent Turn Lanes	19,000	16,500	E	0.868
Singing Hill Driveway #3 to Sloane Canyon Road	2.1C Community Collector with Intermittent Turn Lanes	19,000	15,390	E	0.810
Willow Glen Drive					
South of Dehesa Road	2.1C Community Collector with Intermittent Turn Lanes	19,000	8,760	C	0.461

Source: **Appendix F**

3.12.3 Impacts

Significance Criteria

Impacts to the transportation system would be significant if the project increases off-Reservation traffic volumes to the point where traffic exceeds the design capacity of the roadway after implementation of all feasible mitigation measures. A significant impact could occur if the project reduces the LOS of an off-Reservation intersection/roadway currently operating at an acceptable LOS (LOS D or above) to an unacceptable LOS (LOS E) or adds substantial delay to an intersection/roadway currently operating at LOS E.

Methodology

A TIA (attached as **Appendix F**) was prepared by Linscott, Law and Greenspan, Engineers to assess the potential traffic impacts related to the Project. The first full year of project operations is anticipated to be 2025. The intersections and roadway segments specified in **Section 3.12.2** above were selected to assess the potential impacts from the Project.

Opening Year Conditions

The Opening Year (Year 2025) conditions include anticipated growth that will add traffic to the local circulation system in the near future (i.e., growth between the time when counts were collected and the opening year). The City of El Cajon's Current Development website and the County of San Diego's Current Project website were reviewed to identify relevant, pending pipeline projects in the study area that could be constructed and generate traffic in the vicinity of the Project Site by 2025. No pipeline projects were identified within close proximity of the Project Site. To forecast future traffic volumes for Opening Year (Year 2025) conditions, the SANDAG ABM2+ model was first utilized to obtain the growth rate between Year 2016 and 2025 average daily traffic (ADT). Based on a volume comparison, a growth rate of 1% per year for 2 years was deemed appropriate to use as ambient growth and applied to the existing traffic volumes to develop the Opening Year (Year 2025) conditions. Project traffic was added to the Opening Year (Year 2025) traffic volumes to develop the Opening Year (Year 2025) with Project conditions.

LOS conditions for the study intersections and roadway segments for the Opening Year (Year 2025) were calculated utilizing similar methodology described under **Section 3.12.2** for the existing LOS.

Trip Distribution/Assignment

The Project traffic was distributed and assigned to the street system based on the site location, access to I-8 and SR-54, existing traffic patterns in the area, and anticipated traffic routes to and from the Project Site. Based on the above, the Project traffic distribution assumes 45% of trips oriented to/from the west, 50% oriented to/from the south and 5% oriented to/from the east.

Trip Generation

The Project will generate trips from players and staff who are either living in the dorms or commuting from their home outside of the training campus. For the purposes of this analysis, only commuter trips were analyzed, and it was assumed that all youth academy students will live on campus. The following are the expected daily commuters to the Project Site:

- 30 professional sports players,

- 29 professional sports staff including coaches,
- 30 academy staff,
- 6 visitors, and
- 3-4 deliveries/miscellaneous

It is expected that all commuters to the Project Site will generate two trips each. Typical training hours were estimated to be between 8:00 AM and 3:00 PM, and therefore all players and staff traveling to/from the Project Site would be captured in the AM peak hour. To be conservative, 25% of the afternoon trips are assumed to occur in the PM peak period of 4:00 PM to 6:00 PM, and 10% of visitor trips were assumed to be captured in both the AM and PM peak hours. Similar to the players and staff, 100% of deliveries/miscellaneous trips are assumed to be captured in the AM peak hour and 25% in the PM peak hour. To account for the ceasing of hotel operations after being retrofitted, a "hotel trip credit" was applied to the Project trip generation estimates. This involved subtracting the estimated former hotel trips from the Project's estimated trips to arrive at the net trips. The hotel traffic generation calculations were conducted using the trip generation rates published in the SANDAG's *(Not So) Brief Guide of Vehicular Traffic Generation Rates for San Diego Region* (April 2002). However, the rates for the hotels and motels in the SANDAG guide are based on busy San Diego tourist hotels. Field observations of the existing hotel at the Project Site suggest that the hotel generates less traffic than the recommended SANDAG trip generation rate. In order to take into account the observed traffic, half of the SANDAG motel trip rate was used (4.5 trips/occupied room) instead of the full rate (9 trips/occupied room).

Project Impacts

Construction Traffic

During construction of the Project, additional temporary trips would be generated on weekdays with typical construction work occurring during daytime hours between 7:00 AM and 7:00 PM. The worker arrival peak would be between 6:00 AM and 7:00 AM and the departure peak between 3:30 PM and 4:30 PM. These peak commute times partially coincide with local commute times. Construction activities are estimated to generate a peak of approximately 53 construction worker commute trips, 21 vendor trips, and 21 hauling trips (primarily during fill import). Therefore, there would be an estimated peak total of 95 daily trips during construction (**Appendix D**)[2]. While this would constitute an increase in traffic on roadways in the vicinity of the Project Site, 95 trips would constitute a small percentage of the existing trips (see **Table 3.12-1**), and the additional trips would only occur during construction. Additionally, hauling trips would primarily occur outside of the peak commute hours for the surrounding roadway network and equipment would be moved on and off the Project Site on different days. The periodic delivery and removal of such equipment during mostly off-peak hours would constitute a minimal disruption of existing traffic on the surrounding roadway network. The relatively small number of trips required to make such deliveries and removals would not impact the existing traffic load or capacity of the surrounding roadway network. Therefore, construction of the Project would have a less-than-significant impact on existing traffic in the surrounding area.

Trip Generation and Distribution, and Vehicle Miles Traveled

As shown in **Table 3.12-4**, the Project would generate 253 fewer daily operational trips than the existing hotel, and therefore is expected to result in a net reduction in vehicle miles traveled. The establishment

[2] Worker, vendor, and hauling trips estimates are from the CalEEMod modeling defaults and projections. To view more information on this, please refer to **Appendix D**.

of on-site living facilities for players, staff and students promotes less reliance on vehicle trips and fewer vehicle miles traveled when compared to a traditional development project. However, due to an estimated change in trip patterns, the Project is expected to result in 58 additional net trips during the AM peak hour (75 inbound and -17 outbound), while 16 fewer net trips are expected during the PM peak hour (-21 inbound and 5 outbound). For visual representations of the trip generation and distributions, please refer to Figure 7–1 for Opening Year (Year 2025) Project Traffic Volumes and Figure 7–2 for Opening Year (Year 2025) + Project Traffic Volumes in **Appendix F**.

Table 3.12-4: Trip Generation Summary

Use	Quantity[a]	Daily Trip Ends (ADTs)		AM Peak Hour			PM Peak Hour		
		Rate	*Volume*	*Volume*			*Volume*		
				In	*Out*	*Total*	*In*	*Out*	*Total*
Proposed									
Professional Team Players	30 players	x2	60	29	1	30	1	7	8
Professional Team Coaching and Other Staff	29 staff	x2	58	28	1	29	1	6	7
Youth Academy Staff	30 staff	x2	60	29	1	30	1	7	8
Visitors	6 visitors	x2	12	1	0	1	0	1	1
Deliveries / Miscellaneous[b]	3.5	x2	7	2	2	4	1	0	1
Subtotal			197	89	5	94	4	21	25
Existing									
Hotel[c]	100 rooms	4.5/room	450	14	22	36	25	16	41
Trip Generation Summary									
Net Project Total	*(Proposed minus existing)*		-253	75	-17	58	-21	5	-16

a. Information provided by applicant.
b. Deliveries and miscellaneous vehicles are anticipated to generate 3-4 daily trips. Trip generation calculation used an average of 3.5 trips.
c. Rate is based on half of SANDAG's motel trip rate of 9/room (4.5/room).
General Note: To be conservative, no carpooling was assumed.
Source: Table 6-1 of **Appendix F**

Level of Service – Intersections

Table 7-1 of **Appendix F** summarizes the peak hour intersection operations for the Opening Year (Year 2025) conditions. The Project would not worsen existing LOS at any of the study intersections, with the exception of the Project driveways (refer to Site Access discussion below).

Level of Service – Roadway Segments

Table 7-2 of **Appendix F** summarizes the daily street segment operations for the Opening Year (Year 2025) conditions. As seen in Table 7-2 of **Appendix F**, Willow Glen Dr is calculated to operate at LOS C south of

Dehesa Rd. Dehesa Rd is anticipated to operate at LOS E between Willow Glen Dr and Sloane Canyon Rd, which is below the acceptable LOS of D. Table 7-2 of **Appendix F** also summarizes the daily street segment operations for the Opening Year (Year 2025) + Project conditions. As seen in Table 7-2 of **Appendix F**, Willow Glen Dr is expected to continue to operate at LOS C south of Dehesa Rd. While Dehesa Rd is anticipated to operate at LOS E between Willow Glen Dr and Sloane Canyon Rd, this is the same LOS with or without the Project. The v/c ratio max increase is less than 0.01; this equates to an increase less than the day-to-day fluctuation in traffic and is a less than significant impact. Furthermore, with the addition of the hotel travel credit, it can be seen that there is a flat or decrease in delays and improved operations with this assumption. Therefore, operation of the Project would have a less than significant impact for the roadway segments, potentially even a beneficial impact for operations overall.

Site Access

The Primary Site Entrance for players, staff and visitors is proposed on Dehesa Road at an existing gated driveway to the Singing Hills Hotel (refer to #10 on **Figure 2.1-1**). This segment of Dehesa Road is in acceptable physical condition, and therefore no resurfacing or repaving is anticipated. During the PM peak hour, the Primary Site Entrance could experience high delays (LOS E) on the northbound left-turn movement, depending on operations (i.e., the timing/distribution of players, staff, and visitors departing from the Project Site during the PM peak hour). The impact is not considered significant to the off-Reservation roadway system as the delay would be experienced by those departing the Reservation. Mitigation which may be considered by the Tribe is included in **Table 4-1**, including coordinating departure times for players and staff and/or restriping to provide a 100-foot-long left-turn lane with a 90-foot taper on Dehesa Road approaching the project driveway.

An existing access point to Willow Glen Drive is located approximately 140 feet south of the Dehesa Road/Willow Glen Drive intersection. The driveway's close proximity to the intersection can potentially have higher delays than if it was further south as there are more conflict points, such as vehicles departing the nearby intersection would have to wait behind a vehicle waiting for an adequate gap to make the southbound left-turn to enter the site. A queue of approximately six vehicles would cause a spillback into the intersection. The Project incorporates a Service Site Entrance further south to address this issue.

The Service Site Entrance is proposed to be via a new driveway approximately 900 feet south relative to the existing access location (refer to #12 on **Figure 2.1-1**). At the proposed location, Willow Glen Drive increases from one lane to two lanes in the southbound direction. The Service Site Entrance would be gated and utilized exclusively for deliveries and service vehicles. While this intersection would operate acceptably and only a small number of southbound service vehicles are anticipated to make a left turn during peak hours (conservatively assumed to be 2 vehicles during the AM peak hour and 1 vehicle during the PM peak hour), mitigation that may be considered by the Tribe is included in **Table 4-1**. This includes re-striping to provide a dedicated southbound left-turn lane approaching the proposed driveway and design of the Service Site Entrance to meet County sight distance standards.

Bicycle, Pedestrian, and Transit Networks

The Project would not generate a large number of new pedestrian trips, bicycling activity, or transit riders in the roadways surrounding the Project Site. Further, the overall level of daily traffic on area roadways is expected to decrease relative to existing conditions. Thus, no significant impacts are projected to these networks as a result of the Project.

3.13 IMPACTS FROM PROJECT OFF-SITE IMPROVEMENTS AND MITIGATION

Off-site improvements are described more fully in **Section 2.11** and include the following:

On-Reservation

- Development of a stormwater treatment BMP and sewer lift station within the area proposed for the relocated driving range.
- Development of a small detention berm approximately 700 feet south of the Project Site.
- Extension of a fire flow line just east and south of the Project Site.

Off-Reservation

- Extension of water and fire flow lines from the Project Site to a connection point in Willow Glen Drive.
- Extension of a new service access road from the Project Site boundary to Willow Glen Drive.
- Roadway restriping on Dehesa Road and Willow Glen Drive.

All off-site improvements are located in previously disturbed areas. While some off-site improvements will be constructed in the area of the relocated driving range, the development of the driving range is a separate Tribal project. As discussed in **Section 2.11.4**, the development of the relocated driving range is not subject to the HEARTH Act process; however, it would be carried out in compliance with Tribal and federal regulations. Additionally, the currently contemplated location of the relocated driving range (shown on **Figure 2.1-1**) is previously disturbed habitat associated with the Pine Glen golf course and driving range portions of the Singing Hills Golf Resort.

3.13.1 Aesthetics

With the exception of the detention berm, all off-site project improvements would be located at or below grade and would not present a visual impact. The proposed berm includes approximately 12-18 inches of soil placement in small portion of a cart path and thus would not represent a major visual alteration. The aesthetic impacts from off-site improvements related to the Project would be less than significant.

3.13.2 Air Quality

There would be construction emissions from the off-site improvements. Development would result in short-term, construction-related air pollutant and greenhouse gas emissions. The construction phase would produce two types of air contaminants: exhaust emissions from construction equipment and fugitive dust generated as a result of soil disturbance activities. Due to the small size of off-site improvements compared to the Project, construction-related emissions would be less and with incorporation of BMPs similar to those in **Table 2.10-1**, air quality and GHG impacts would be less than significant.

Off-site utility and drainage improvements would not emit any criteria air pollutants or other emissions when fully constructed. Roadway improvements would reduce congestion and improve traffic flow. With the improved circulation resulting from traffic mitigation, idling time would be reduced and hence

associated vehicle emissions. Operational effects of the traffic improvements would, therefore, be less than significant

3.13.3 Biological Resources

The off-site improvement areas have been previously disturbed and do not contain wetlands/waters of the U.S., critical habitat, or habitat to support federally-listed species. The proposed berm is within 100 feet of San Diegan Coastal Sage Scrub, which may provide suitable habitat to support the federally-listed coastal California gnatcatcher. This consists of a narrow strip of scrub habitat along Willow Glen Drive which is marginally suitable habitat. While this habitat is unlikely to support breeding habitat for CCG, mitigation in **Table 4-1** includes pre-construction nesting bird surveys. This mitigation measure would reduce impacts from off-site improvements to a less-than-significant level.

3.13.4 Cultural Resources

Off-site improvement areas have been previously disturbed and are unlikely to contain cultural resources. There is a potential for unanticipated discoveries of cultural resources to occur during trenching and ground disturbing activities associated with off-site improvements. Mitigation measures included in **Table 4-1** would reduce potential impacts associated with unanticipated discoveries of cultural and paleontological resources. This mitigation measure would reduce impacts from off-site improvements to a less-than-significant level

3.13.5 Geology and Soils

Earth-moving activities for off-site improvements would include minor grading, excavation, stockpiling of soil, and the use of heavy machinery and equipment. Grading activities would largely be balanced and would not equate to a major change to the existing topography. BMPs listed in **Table 2.10-1** would reduce potential erosion impacts to a less-than-significant level.

3.13.6 Hazards and Hazardous Materials

Off-site improvements would be typical for road, utility, and stormwater facility construction and may involve hazardous materials (e.g., fuels, paints). Additionally, sparks or other ignition sources during construction could pose wildfire risks. Implementing BMPs similar to those included in **Table 2.10-1** would reduce these potential impacts to less-than-significant levels.

3.13.7 Hydrology

Indirect impacts to surface water and water quality from potential discharge of pollutants to surface waters during construction of off-site improvements would be similar to the Project. Implementing BMPs similar to those included in **Table 2.10-1** would reduce these potential impacts to less-than-significant levels. Off-site drainage improvements include a stormwater treatment BMP, detention basin, and small berm which would be designed to address 100-year stormwater flows. This would ensure that post-development flows meet or improve pre-development conditions during major storm events. No significant adverse hydrologic impacts would occur from development of these facilities.

3.13.8 Land Use

No impacts to land use are anticipated from proposed utility and roadway improvements.

3.13.9 Noise

Construction noise would be temporary and would utilize similar equipment to the Project. Off-Reservation improvements would be subject to County construction noise standards and thus generally limited to daytime hours. There would be no operational noise from the proposed off-site utility and roadway improvements. For these reasons, impacts from off-site improvement would be less than significant.

3.13.10 Public Services

The impacts of increased water and wastewater demands as a result of proposed off-site utility connections is addressed in **Section 3.11**. These improvements would be conducted in coordination with the Otay Water District. Construction of off-site improvements could generate small amounts of construction waste but is not anticipated to significantly reduce the life of the Sycamore landfill. Off-site improvements are not anticipated to affect law enforcement, fire protection, or emergency medical services.

3.13.11 Transportation and Circulation

Off-site improvements would have minimal impact on traffic beyond temporary construction impacts that would be similar but less to those described in **Section 3.12.3** and are anticipated to be less than significant. For the roadway improvement, restriping would occur in consultation with the County. Utility improvements once operational would have no effect on traffic.

Section 4 | Mitigation Measures

Mitigation measures to be implemented during construction and operation of the Project are summarized in **Table 4-1** below.

Table 4-1: Mitigation Measures

Resource Area	Proposed Mitigation
Biological Resources	<u>Preconstruction Nesting Migratory Bird/Raptor Survey:</u> ▪ If construction activities commence during the general nesting season (February 1 to August 31), a preconstruction nest survey shall be conducted by a qualified biologist within 500 feet of proposed construction areas within 3 days of initiating ground disturbance. ▪ If active nests are identified, the qualified biologist shall determine a suitable avoidance buffer based on the needs of the species observed. Avoidance measures may include establishment of a buffer zone using construction fencing or the postponement of vegetation removal until after the nesting season, or until after a qualified biologist has determined the young have fledged. Avoidance buffers may vary in size depending on habitat characteristics, project-related activities, and disturbance levels. ▪ Should work activity cease for 14 days or greater during the nesting season, surveys shall be repeated to ensure birds have not established nests during inactivity.
Cultural Resources	<u>Inadvertent Discoveries of Cultural Resources</u> ▪ A Sycuan Tribal Monitor will be present during initial ground disturbance to monitor for potential inadvertent discoveries during construction. ▪ A Sycuan Tribal Monitor shall periodically check to ensure that orange construction fencing surrounding the known cultural resource in the Project Site is in good condition. ▪ If archaeological or historic resources are uncovered during construction-related ground disturbance, work within 50 feet of the find shall be halted until a Sycuan Tribal Monitor or professional archaeologist can assess the significance of the find in consultation with the Tribe. If the find is determined to be significant by the Tribe or archaeologist, the Sycuan Tribal Monitor or archaeologist shall meet with the Tribe to determine the appropriate course of action, including development of a treatment plan and implementation of appropriate provisions, if necessary. ▪ In the event of any inadvertent discovery of human remains during construction-related ground disturbance, work within 100 feet of the find shall be halted until the Tribe and County Coroner are contacted. Human remains shall be covered immediately and no further disturbance shall occur until the necessary findings as to the origin and disposition have been made. Construction shall not resume in the vicinity until final disposition of the remains has been determined.

	▪ In the event of any inadvertent discovery of paleontological resources during construction-related ground disturbance, work within 50 feet of the find shall be halted until a paleontologist can be contacted to assess the find in consultation with the Tribe. If the find is determined to be significant by the paleontologist, the paleontologist shall meet with the Tribe to determine the appropriate course of action.
Transportation/ Circulation	The Tribe will consider the following mitigation measures: <u>Willow Glen Dr/Service Entrance</u> ▪ Stripe a 100-foot-long left-turn lane with a 90-foot taper approaching the new Service Site Entrance on Willow Glen Drive (refer to Figure 8-1 in Appendix F for a conceptual design). ▪ The new Service Site Entrance driveway shall meet County of San Diego sight standards. <u>Dehesa Rd/Main Entrance</u> ▪ Stripe a 100-foot-long left-turn lane with a 90-foot taper on Dehesa Road approaching the Primary Site Entrance driveway on Dehesa Road (refer to Figure 8-2 in **Appendix F** for a conceptual design). ▪ Whenever feasible, schedule shifts to end before 4 PM or otherwise stagger departures from the Project Site during the PM peak period.

Section 5 | References

AES, 2011a. Natural And Cultural Resources Management Plan of 2011. Sycuan Band of the Kumeyaay Nation. June 2011.

AES, 2011b. Final Environmental Assessment Sycuan Band of the Kumeyaay Nation Fee-to-Trust. August 2011.

Bureau of Indian Affairs, 2023. Golden Eagles Interagency Hotshot Crew. Available online at: https://www.bia.gov/service/wildfire-response/golden-eagles-ihc. Accessed July 2023.

CALFIRE, 2021. 2021 Wildfire Activity Statistics. Available online at: https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/2021_redbook_final.pdf?rev=525959073bbe4bbe816d67624911e4c3&hash=CFD17F879B2CE984AB5BA9FEA4F73A56#:~:text=2021%20STATEWIDE%20FIRE%20SUMMARY,-During%202021%2C%20wildfire&text=CAL%20FIRE%2C%20through%20State%20funded,in%20acres%20burned%20from%202020. Accessed July 2023.

CALFIRE, 2023a. State Responsibility Area (SRA) Viewer. Available online at: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1. Accessed July 2023.

CALFIRE, 2023b. Fire Hazard Severity Zones in State Responsibility Area. June 15, 2023. Available online at: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008. Accessed July 2023.

California Air Resources Board (CARB), 2022. Maps of State and Federal Area Designations. Available online at: https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed July 2023.

CalRecycle, 2016. Facility/Site Summary Details regarding the Sycamore Sanitary Landfill (37-AA-0023). Available online at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1798?siteID=2871. Accessed July 2023.

CalTrans, 2023. California State Scenic Highway System Map. Available online at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed July 2023.

CARB, 2022. Maps of State and Federal Area Designations. Available online at: https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed July 2023.

CGS, 2002. California Geomorphic Provinces. Available online at: https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-36.pdf. Accessed July 2023.

County of San Diego Planning & Development Services (PDS), 2015. 2015 GHG Guidance, Recommended Approach to Addressing Climate Change in CEQA Document. January 21, 2015.

County of San Diego, 2023. Climate Action Plan Update website. Available online at: https://www.sandiegocounty.gov/content/sdc/sustainability/climateactionplan.html. Accessed July 2023.

Department of Transportation, 2022. National Transportation Noise Map. May 18, 2022. Available online at: https://maps.dot.gov/BTS/NationalTransportationNoiseMap/. Accessed July 2023.

Dexter Wilson Engineering, Inc., 2023. Personal Communication. 2234 Faraday Avenue Carlsbad, CA. July 2023.

DOC, 2023. Earthquake Zones of Required Investigation. Available online at: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed July 2023.

EDD, 2023. Employment Development Department. Unemployment Rate and Labor Force. Available online at: https://labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSResults.asp?selectedarea=San+Diego+County&selectedindex=37&menuChoice=localAreaPro&state=true&geogArea=0604000073&countyName. Accessed August 2023.

Federal Highway Administration, 2006. FHWA Highway Construction Noise Handbook. Available online at: https://rosap.ntl.bts.gov/view/dot/8837/dot_8837_DS1.pdf?%20. Accessed July 2023.

FTA, 2006. Transit Noise and Vibration Impact Assessment. Available online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf Accessed July 2023.

FTA, 2018. Transit Noise and Vibration Impact Assessment Manual. September 2018. Available online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed July 2023.

Harris & Associates, 2023. Biological Constraints Memorandum. July 20, 2023.

National Agricultural Statistics Service (NASS), 2017. Census of Agriculture – County Summary Highlights 2017. Available online at: https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/County_Profiles/California/cp06073.pdf. Accessed July 2023.

NCEI, 2023. U.S. Climate Normals for El Cajon, CA. Available online at: https://www.ncei.noaa.gov/products/land-based-station/us-climate-normals. Accessed July 2023.

Otay Water District, 2023. At-a-glance. Available online at: https://otaywater.gov/about-otay/otay-at-a-glance/. Accessed July 2023.

Project Clean Water, 2023. "San Diego Bay." Available online at: https://projectcleanwater.org/watersheds/san-diego-bay-wma/#___Hydrologic_Area_HA_-Descriptions___. Accessed July 2023.

San Diego County, 1997. Multiple Species Conservation Program, County of San Diego Subarea Plan. Available online at: https://www.sandiegocounty.gov/content/dam/sdc/pds/mscp/docs/SCMSCP/MSCP_County_Subarea_Plan.pdf. Accessed July 2023.

San Diego County, 2007. County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality. Department of Planning and Land Use, Department of Public Works. March 19, 2007.

SCS Engineers, 2023a. Phase I Environmental Site Assessment, Northern Portion of Assessor's Parcel Number, 515-050-43, 3007 Dehesa Road, El Cajon, California 92019. Prepared by SCS Engineers. March 31, 2023.

SCS Engineers, 2023b. Phase II Environmental Site Assessment, Northern Portion of Assessor's Parcel Number, 515-050-43, 3007 Dehesa Road, El Cajon, California 92019. Prepared by SCS Engineers. May 5, 2023.

Sycuan, 2019. "Sycuan Tribal Police Department Celebrates Four Firsts." July 8, 2019. Available online at: https://www.sycuan.com/blog/sycuan-tribal-police-department-celebrates-four-firsts/. Accessed July 2023.

Sycuan, 2023a. Cultural Resources Report. Golf Course Academy Project Summary.

Sycuan, 2023b. Sycuan Casino Green Team. Available online at: https://www.sycuan.com/green-team/. Accessed July 2023.

UCMP, 2023. UCMP Specimen Search. Available online at: https://ucmpdb.berkeley.edu/. Accessed July 2023.

USDA, 2023. Natural Resources Conservation Service. Web Soil Survey. Custom Soil Resources Report. Available online at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed July 2023.

USEPA, 2016. What Climate Change Means for California. August 2016. Available online at: https://www.epa.gov/sites/default/files/2016-09/documents/climate-change-ca.pdf. Accessed August 2022.

USEPA, 2022. What are Hazardous Air Pollutants? Last updated December 19, 2022. Available online at: https://www.epa.gov/haps/what-are-hazardous-air-pollutants. Accessed July 2023.

USEPA, 2023a. Nonattainment Areas for Criteria Pollutants (Green Book). Available online at: https://www.epa.gov/green-book. Accessed July 2023.

USEPA, 2023b. EPA's website on Smart Growth and Climate Change. Last updated May 19, 2023. Available online at: https://www.epa.gov/smartgrowth/smart-growth-and-climate-change#mitigation. Accessed July 2023.

USFWS, 2011. Formal Section 7 Consultation for the Proposed Sycuan Band of the Kumeyaay Nation Fee-to-Trust Application and Associated Development Project, San Diego County, CA. August 9, 2011.

USGS, 2023a. U.S. Quaternary Faults Interactive Map. Available online at: https://www.usgs.gov/tools/interactive-us-fault-map. Accessed July 2023.

USGS, 2023b. MRDS by commodity. Available online at: https://mrdata.usgs.gov/mrds/map-commodity.html. Accessed July 2023.

Section 6 | Preparers

Acorn Environmental

Ryan Sawyer, AICP – Principal
Jennifer Wade – Principal
Kt Alonzo – Senior Biologist
Josh Ferris – Senior Environmental Analyst
Kimberly Fuchs – Senior Environmental Analyst
Kristen Miner – Environmental Analyst
Darienne Highsmith – Environmental Analyst
Jeremy Huey – GIS, Graphics

Linscott, Law & Greenspan Engineers – Transportation Analysis

John Boarman, PE – Principal
Renald Espiritu – Transportation Engineer III

Project Design Consultants – Grading, Drainage And Stormwater Quality Studies

Martin Jones, PE
Chelisa Pack, MS, PE, QSD
Jennifer Maynard

Dexter Wilson Engineering– Water And Sewer Study

Fernando Fregoso, PE