

Summit Townhomes Addendum and CEQA Environmental Checklist

Tentative Map No. (TM-2023-0003)
Development Review (DR-2023-0007)



Lead Agency



City of Santee
10601 Magnolia Avenue
Santee, CA 92071619) 258-4100, Extension 157
Email: Crios@CityofSanteeCa.gov

Project Proponent

Warmington Residential
Southern California Division
3090 Pullman Street
Costa Mesa, CA 92626
MEsquivel@warmingtongroup.com

CEQA Consultant



11801 Pierce Street, Ste. 200
Riverside, CA 92505
951-710-3010

June 2025

Table of Contents

1.	Introduction	1
2.	Purpose of an Addendum.....	1
3.	Purpose of a CEQA Guidelines Section 15183 Evaluation Checklist	3
4.	Project Title.....	4
5.	Lead Agency Name and Address	4
6.	Contact Person/Phone Number/Email.....	4
7.	Project Location.....	4
8.	Project Description	4
9.	Project Sponsor's Name and Address	4
10.	General Plan Designation	5
11.	Zoning.....	5
12.	Previous Environmental Document Findings	5
13.	Proposed Project Description.....	12
14.	Surrounding Land Uses and Setting.....	14
15.	Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement).....	15
16.	Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?.....	15
17.	New significant environmental effects or substantially more severe significant environmental effects compared to those identified in the previous CEQA document.	15
18.	Determination	15
19.	Evaluation of Environmental Impacts	27
19.1	Aesthetics	30
1.	Section 15164 Analysis	30
2.	Findings	33
19.2	Air Quality	35
1.	Section 15164 Analysis	35
2.	Findings	39
19.3	Biological Resources	40
1.	Section 15164 Analysis	40
2.	Findings	53
19.4	Cultural Resources.....	55
1.	Section 15164 Analysis	55
2.	Findings.....	59
19.5	Energy	61
1.	Section 15164 Analysis	61
2.	Findings	64
19.6	Geology and Soils	66
1.	Section 15164 Analysis	66

2. Findings	71
19.7 Greenhouse Gas Emissions	73
1. Section 15164 Analysis	73
2. Findings	81
19.8 Hazards and Hazardous Materials	83
1. Section 15164 Analysis	83
2. Findings	87
19.9 Hydrology and Water Quality.....	89
1. Section 15164 Analysis	89
2. Findings	92
19.10 Land Use and Planning.....	94
1. Section 15164 Analysis	94
2. Section 15183 Finding	96
19.11 Mineral Resources	98
1. Section 15164 Analysis	98
2. Findings	98
19.12 Noise.....	100
1. Section 15164 Analysis	100
2. Findings	105
19.13 Population and Housing.....	107
1. Section 15164 Analysis	107
2. Findings	108
19.14 Public Services	110
1. Section 15164 Analysis	110
2. Findings	111
19.15 Recreation.....	112
1. Section 15164 Analysis	112
2. Findings	112
19.16 Transportation	114
1. Section 15164 Analysis	114
2. Findings	116
19.17 Utilities and Service Systems.....	118
1. Section 15164 Analysis	118
2. Findings	120
19.18 Wildfire	122
1. Section 15164 Analysis	122
2. Findings	127

Figures

Figure 1: Site Location Map	18
Figure 2: Project Site / Aerial Photo.....	19
Figure 3: Street View from Summit Avenue Looking East.....	20
Figure 4: Housing Element Rezone Sites	21
Figure 5: Tentative Tract Map No.2023-0003.....	22
Figure 6: Illustrative Site Plan	23
Figure 7: Dwelling Unit Mix.....	24

Figure 8: Typical Architectural Elevations..... 25
Figure 9: Open Space Requirements 26
Figure 10: Fuel Treatment Zones 128

Tables

Table 1: Proposed Project Development Standards 13
Table 2: Proposed Project Dwelling Unit Mix..... 13
Table 3: Land Uses, General Plan Land Use Designations, and Zoning Classifications..... 14
Table 4: Proposed Project Compliance with Development Standards..... 32
Table 5: Construction Emissions Summary..... 36
Table 6: Operational Emissions Summary 37
Table 7: Scoping Plan Consistency Summary..... 75
Table 8: Sustainable Santee Plan Consistency Checklist 78
Table 9: Annual Greenhouse Gas Emissions (MT per year)..... 81
Table 10: Proposed Project Consistency with Land Use Plans and Policies 94
Table 11: Vibration Source Levels for Construction Equipment 104

Appendices

- Appendix A** - City of Santee Housing Element Rezone Program Implementation PEIR, SCH #2021100263, June 17, 2022, Table S-1-Summary of Impacts and Mitigation Measures
- Appendix B** - Air Quality and Greenhouse Gas Study, Birdseye Planning Group, October, 2023
- Appendix C** - Biological Resources Letter Report for the Warmington Santee Residential Project, Harris & Associates, November 8, 2023
- Appendix D** - Historical/Archeological Resources Survey Report, CRM Tech, December 9, 2023
- Appendix E** - 2nd Revision to Updated Geotechnical Evaluation proposed Summit Avenue Condominiums, Petra Geosciences Inc., December 17, 2024
- Appendix F** - Phase I Environmental Site Assessment, Stantec, August 31, 2023.
- Appendix G** - Storm Water Quality Management Plan, Rick Engineering Company, March 17, 2025
- Appendix H** - Noise Analysis Report, dBF Associates, Inc., October 26, 2023
- Appendix I** - Summit Avenue Trip Generation Analysis and VMT Screening, TJW Engineering, Inc., March 28, 2024
- Appendix J** - Fire Protection Plan, Firewise2000, LLC, January 26, 2024

Environmental Checklist - Summit Avenue Residential Project

**Pursuant to CEQA Guidelines §15183 and §15162
for the Final Program Environmental Impact Report (EIR) (SCH #2021100263)
for the Housing Element Rezone Program Implementation Project**

1. Introduction

This Addendum and California Environmental Quality Act (CEQA) Guidelines Sections 15183 and 15162 Environmental Checklist have been prepared in accordance with CEQA, as amended, to make minor technical changes and additions to the Final Program Environmental Impact Report (PEIR) for the Housing Element Rezone Program Implementation Project (referenced herein as the "Previously Approved Project") prepared for the City of Santee, certified on October 12, 2022, and, as a separate method of CEQA compliance, to address the housing needs and objectives of the City and to meet the requirements of state law. While much of the analysis herein applies to both the Addendum and the CEQA Guidelines Section 15183 and Evaluation, they are two separate types of CEQA review, and each serve as a standalone means for CEQA compliance for the proposed project. This Addendum and CEQA Guidelines Section 15183 Environmental Checklist focus on the current project proposal (referenced herein as the "Proposed Project"), which includes the development of an approximately 4.65-acre parcel with 42 condominium units at a density of 9 dwelling units per acre described in Section 8 *Project Description*.

The Proposed Project would not result in new or substantially more severe significant environmental impacts compared with the environmental impacts disclosed in the Previously Approved Project, nor are there any other circumstances that require the preparation of a subsequent or supplemental EIR. There are no impacts that are peculiar to the project or project site; there are no new significant effects that were not analyzed as significant effects in the Previously Approved Project PEIR; there are no potentially significant off-site or cumulative impacts that were not discussed in the PEIR; and the significant effects identified in the Previously Approved Project PEIR would not be more severe than previously discussed as a result of substantial new information which was not known at the time the PEIR was certified.

2. Purpose of an Addendum

CEQA, a Statewide environmental law contained in Public Resource Code (PRC) Sections 21000–21189.70.10, applies to public agency discretionary decisions which carry out, authorize, or approve actions that have the potential to adversely affect the environment. The CEQA Guidelines allow for updating and using a previously certified PEIR or adopted Negative Declaration for projects that have changed or are different from the original project or conditions analyzed in the certified PEIR or adopted Negative Declaration. In general, in cases where changes or additions occur with no new or substantially more severe significant environmental impacts, an addendum to a previously certified PEIR or adopted Negative Declaration may be prepared, consistent with CEQA Guidelines Sections 15162 and 15164. This Addendum has been prepared in accordance with Section 21166 of CEQA and Sections 15162 and 15164 of the CEQA Guidelines.

Section 15164(a) of the CEQA Guidelines states that "the lead agency or a responsible agency shall prepare an addendum to a previously certified PEIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Pursuant to Section 15162(a) of the CEQA Guidelines, a Subsequent EIR or Negative Declaration is only required when:

- 1) *Substantial changes are proposed in the project which will require major revision of the previous PEIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
- 2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revision of the previous PEIR or negative declaration due to the involvement of new significant environmental increase in the severity of previously identified significant effects; or*
- 3) *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous PEIR was certified as complete or the negative declaration was adopted, shows any of the following:*
 - (a) The project will have one or more significant effects not discussed in the previous PEIR or negative declaration;*
 - (b) Significant effects previously examined will be substantially more severe than shown in the previous PEIR;*
 - (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - (d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous PEIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

If none of these circumstances are present, and only minor technical changes or additions are necessary to update the previously certified PEIR or adopted Negative Declaration, an Addendum may be prepared, consistent with CEQA Guidelines Section 15164. CEQA Guidelines Section 15164 states:

- (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified PEIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

- (b) *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*
- (c) *An addendum need not be circulated for public review but can be included in or attached to the final PEIR or adopted negative declaration.*
- (d) *The decision-making body shall consider the addendum with the final PEIR or adopted negative declaration prior to making a decision on the project.*
- (e) *A brief explanation of the decision not to prepare a subsequent PEIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

This Addendum to the Previously Approved Project PEIR has been prepared because the Proposed Project would not result in any of the circumstances requiring a Subsequent or Supplemental EIR or Negative Declaration. Although the Proposed Project includes more specific details about buildout of the site than what was considered in the PEIR, the Proposed Project modifications do not trigger the need for preparation of a Subsequent or Supplemental EIR under the criteria listed in CEQA Guidelines Sections 15162, 15163, respectively and based on the substantial evidence within this Addendum.

3. Purpose of a CEQA Guidelines Section 15183 Evaluation Checklist

Pursuant to Section 15168 of the CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a Program EIR gives the Lead Agency an opportunity to consider broad policy alternatives and program-wide Mitigation Measures, as well as greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale. As such, the PEIR for the Housing Element Rezone Program Implementation Project was prepared as a long-term planning document to address housing needs in the City in compliance with state law.

Article 12 (Special Situations) of the CEQA Guidelines identifies situations for which certain CEQA-compliance procedures may apply, including for projects consistent with a community plan, general plan, or zoning. Specifically, Section 15183(a) of the CEQA Guidelines states that:

“CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.”

Pursuant to Section 15183(c) of the CEQA Guidelines, "If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards...then an additional EIR need not be prepared for the project solely on the basis of that impact."

The project site is comprised of a 4.65 acre parcel zoned R-7 with a Medium Density Residential land use designation within the City's 6th Cycle Housing Element as implemented by the Previously Approved Project. The City's 6th Cycle Housing Element is part of the general plan with a certified EIR (the PEIR) for the purposes of CEQA Guidelines Section 15183. Accordingly, in addition to serving as an Addendum to the PEIR, the analysis contained herein evaluates whether the Summit Townhomes Project, which is consistent with the allowable uses and density of the general plan and zoning, would qualify for an exemption from CEQA pursuant to CEQA Guidelines Section 15183.

4. Project Title

Summit Townhomes
Tentative Map (TM-2023-0003)
Development Review (DR-2023-0007)

5. Lead Agency Name and Address

City of Santee
10601 Magnolia Avenue
Santee, CA 92071

6. Contact Person/Phone Number/Email

Christina Rios
(619) 258-4100, Extension 157
Email: Crios@CityofSanteeCa.gov

7. Project Location

East side of Summit Avenue, approximately 120 feet north of Noble Way. APN 378-190-01-00-00 (see Figure 1, Site Location Map).

8. Project Description

The Proposed Project would subdivide an approximately 4.65-acre parcel into 42 condominium units with a density of 9 dwelling units per acre.

9. Project Sponsor's Name and Address

Warmington Residential, Southern California Division
3090 Pullman Street
Costa Mesa, CA 92626
Attn: Matthew Esquivel, Email: MEsquivel@warmingtongroup.com

10. General Plan Designation

Medium Density Residential

11. Zoning

R-7

12. Previous Environmental Document Findings

On October 12, 2022, the City of Santee adopted Resolution No. 125-2022, certifying the Final Program Environmental Impact Report (EIR) (SCH #2021100263) for the Housing Element Rezone Program Implementation Project (**Previously Approved Project**), adopting Findings of Fact and a Statement of Overriding Considerations under the California Environmental Quality Act, and adopting a Mitigation Monitoring and Reporting Program. A Notice of Determination was filed with the County Clerk on October 12, 2022.

The Previously Approved Project identified that there were no significant impacts in the areas of Agriculture and Forestry Resources, Energy and Mineral resources, as identified in the following analysis, and therefore these issues are not discussed further in this analysis:

Impacts Found Not to Be Significant

Agricultural and Forestry Resources (Section 8.1)

The California Department of Conservation, Division of Land Resource Protection, identifies important farmland throughout the state through its Farmland Mapping and Monitoring Program (FMMP). The FMMP is non-regulatory and was developed to inventory land and provide categorical definitions of important farmlands and consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. The FMMP classifies the majority of the Rezone Sites as "Urban and Built Up Land," "Other Land," and "Grazing Land." The areas classified as "Grazing Lands" are not considered a significant farmland resource under CEQA. A few Rezone Sites are classified as "Farmland of Local Importance"; however, there is no recent history of agricultural use at these sites. There are no lands protected by a Williamson Act Contract within the City. Additionally, there is no forestland within the City, and the City does not possess any zoning classifications for forestland, timberland, or timberland production zones. Therefore, no impacts to agricultural and forestry resources would occur.

Proposed Project Finding: Rezone Site 1 is classified by the California Department of Conservation, Farmland Mapping and Monitoring Program as "Urban and Built Up Land."¹ Additionally, Rezone Site 1 does not contain "forest land," which is defined as land that can support 10% native tree cover of any species under natural conditions and allows for the management of one or more forest resources. This definition, found in California Public Resources Code (PRC) §12220(g), encompasses lands suitable for timber, aesthetics, fish and

¹ <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed April 16, 2025.

wildlife, or other forest resources. Therefore, no impacts to agricultural and forestry resources would occur with implementation of the proposed project, similar to the Previously Approved Project.

Energy (Section 8.2)

Construction

Consistent with state requirements, all construction equipment would meet California Air Resources Board (CARB) Tier 3 In-Use Off-Road Diesel Engine Standards. Engines are required to meet certain emissions standards, and groups of standards are referred to as Tiers. A Tier 0 engine is unregulated with no emissions controls, and each progression of standard level (e.g., Tier 1, Tier 2, Tier 3) generates lower emissions, uses less energy, and is more advanced technologically than the previous tier. CARB's Tier 3 In-Use Off-Road Diesel Engine Standards requires that construction equipment fleets become cleaner and use less energy over time. Therefore, the Project would not result in a wasteful and inefficient use of energy resources during the construction of future development, and impacts would be less than significant.

Operations

Future development associated with the implementation of residential development at the Rezone Sites would be subject to compliance with the California Building Code (Title 24), which aims to reduce excessive and inefficient energy use. The California Building Code is regularly updated and includes higher energy-efficiency standards than other states. Individual development projects in the City would be required to comply with applicable federal, state, and local energy and building regulations, including the requirements of the Sustainable Santee Plan.

The Previously Approved Project would not conflict with or obstruct implementation of CALGreen and the California Energy Code, or with SDG&E's implementation of the Renewable Portfolio Standard (RPS.) Adherence with state and federal regulations and the Sustainable Santee Plan goals will guide reductions in the City's collective long-term operational greenhouse gas (GHG) emissions.

Additionally, future development would, at a minimum, be required to comply with the mandatory measures included in the current 2019 Energy Code (California Code of Regulations, Title 24, Part 6) and the 2019 CALGreen standards. The mandatory standards require the following.

- Residential solar requirements;
- Outdoor water use requirements as outlined in local water efficient landscaping ordinances or current Model Water Efficient Landscape Ordinance standards, whichever is more stringent;
- Requirements for water-conserving plumbing fixtures and fittings;
- 65 percent construction/demolition waste diverted from landfills;
- Inspections of energy systems to ensure optimal working efficiency; and
- Low-pollutant-emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particle boards.

Impacts relative to the inefficient, wasteful, or unnecessary consumption of energy would be less than significant.

Transportation

Buildout of the Rezone Sites would consume energy-associated transportation uses. Trips by individuals traveling to, from, and within the Project area would largely rely on passenger vehicles. Future projects would be required to comply with the Sustainable Santee Plan by promoting non-motorized transportation options, improving bicycle transit, installing electric vehicle charging stations, and improving traffic flow. This would be demonstrated through the completion of the Sustainable Santee Plan Consistency Checklist. Therefore, the Project would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of transportation-related energy, and impacts would be less than significant.

Proposed Project Finding: As demonstrated in Table 8, Sustainable Santee Plan Consistency Checklist on page 75, Sustainable Santee Plan Consistency Checklist, the Proposed Project is consistent with the applicable policies of the Sustainable Santee Plan. Therefore, impacts are less than significant, the same as the Previously Approved Project.

Mineral Resources (Section 8.3)

Rezone Sites 15, 16A, 16B, 17, and 20A are designated as Mineral Resource Zones (MRZ) MRZ-2. Sites 1-12, 19, 24, 29, 30 and both Graves Avenue sites are designated as MRZ-3, and Sites 18, 20B, 35, and 25 are designated as a mix of both MRZ-2 and MRZ-3. Although some Rezone Sites are located within a MRZ-2 designated area, these areas are not zoned for mining operations, and the existing land use would also not be a mining land use, because mining would not be a consistent land use with the surrounding area. While these lands may support mineral resources, mining operations at these sites would not be feasible considering the proximity to sensitive receptors and existing established neighborhoods. Furthermore, the Rezone Sites are not designated as locally important mineral resource recovery sites in the Santee General Plan. Therefore, the Project would not result in the loss of availability of a known mineral resource or locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan, and impacts would be less than significant.

Proposed Project Finding: Rezone Site 1 is designated as MRZ-3, which are areas containing known or inferred aggregate. As noted above, all of the MRZ zones in the City are not feasible for mineral extraction because of the proximity to existing residential land use or lot size limitations, nor are they designated by the City's General Plan as mineral resources recovery sites. Therefore, impacts are less than significant, the same as the Previously Approved Project.

Impacts Found to be Less than Significant or Less than Significant with Mitigation Incorporated

The analysis in the Draft Program EIR determined that implementation of the Previously Approved Project would result in the following Less than Significant or Less than Significant with Mitigation impacts. The Proposed Project Finding is addressed in Section 19.

Aesthetics (Sections 4.1.5-4.1.8)

- The requirement for Development Review consistent with Municipal Code Chapter 13.08 would ensure consistency with General Plan policies and that future development would not degrade scenic vistas, resources, and views. Additionally, with the implementation of Mitigation Measure **MM-CUL-1**, future development at the Rezone Sites in proximity to the Polo Barn would not result in significant impacts on visual character and quality (Impact VIS-1). Impacts would be **less than significant**.

Air Quality (Sections 4.2.7-4.2.8)

- Buildout of the Previously Approved Project would not result in carbon monoxide (CO) hot spots, and construction and operation of future development would not result in the exposure of sensitive receptors to toxic air contaminants (TACs) from construction activities, stationary sources, or mobile sources. The Previously Approved Project would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be **less than significant**.

Biological Resources (Sections 4.3.5-4.3.10)

- With the implementation of Mitigation Measures **MM-BIO-1**, **MM-BIO-2**, **MM-BIO-3**, and **MM-BIO-4**, the Previously Approved Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the CDFW or USFWS. Impacts would be **less than significant**.
- With the implementation of Mitigation Measures **MM-BIO-1** and **MM-BIO-5**, the Previously Approved Project's impacts on sensitive vegetation communities would be reduced to **less than significant**.
- With the implementation of Mitigation Measure **MM-BIO-6**, the Previously Approved Project would not have a substantial adverse effect on wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means; nor would the Previously Approved Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Impacts would be **less than significant**.
- Impacts associated with wildlife movement corridors would be less than significant. Potential impacts associated with conflicts with the Draft Santee Subarea Plan or any local, regional, and state Habitat Conservation Plans (HCPs) would be less than significant. Potential impacts associated with local tree policies or ordinances protecting biological resources, such as local watercourses, would be **less than significant**.

Cultural Resources and Tribal Cultural Resources (Sections 4.4.5-4.4.7)

- With the implementation of Mitigation Measure **MM-CUL-1**, the Previously Approved Project would not result in a substantial adverse change in the significance of a historical resource as defined in CEQA §15064.5. Impacts would be **less than significant**.
- With the implementation of Mitigation Measures **MM-CUL-2** and **MM-CUL-3**, the Previously Approved Project would not result in a substantial adverse change in the significance of an archaeological resource according to CEQA §15064.5; religious uses or tribal cultural resources. Impacts would be **less than significant**.
- As regulations are in place to treat any inadvertent uncovering of human remains during grading, potential impacts to human remains would be **less than significant**.

Geology/Soils and Paleontology (Sections 4.5.5-4.5.8)

- Through regulatory compliance, impacts associated with seismic hazards, unstable geology, soil erosion and expansive soils would be **less than significant**. **No impacts** would occur related to the use of septic tanks.

Hazardous Materials (Sections 4.7.5-4.7.9)

- With the implementation of Mitigation Measure **MM-HAZ-1**, the Previously Approved Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous material or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The Previously Approved Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be **less than significant**.
- None of the Rezone Sites within the Previously Approved Project are located within the hazardous materials sites pursuant to Government Code §65962.5 (Cortese List). Conformance with applicable City policies, Airport Land Use Compatibility Plan (ALUCP) design considerations applicable to development within airport safety zones, and compliance with any applicable FAA conditions would ensure that future development associated with the Previously Approved Project located within the Gillespie Field and MCAS Miramar AIA would not result in a safety hazard for people residing or working in the Previously Approved Project area.
- The Previously Approved Project would not conflict with an emergency response plan or evacuation plan. The Previously Approved Project would be required to adhere to City regulations, comply with General Plan policies related to fire safety, and follow additional Fire Code and Wildland Urban Interface Areas (WUIA) regulations. Through regulatory compliance, impacts to wildland fire safety would be **less than significant**.

Hydrology and Water Quality (Section 4.8.5-4.8.8)

- Through federal, state and local regulatory compliance, impacts related to water quality standards and waste and storm water discharge requirements would be **less than significant**. The Previously Approved Project would not be dependent on groundwater and therefore would not adversely affect groundwater recharge or obstruct implementation of a sustainable groundwater management plan. The Previously Approved Project is not within an area anticipated to be adversely affected by a tsunami or seiche and would be required to conform to applicable federal, state, and local regulations to effectively avoid and/or address impacts associated with development in the 100-year flood zone.

Land Use and Planning (Section 4.9.5)

- The Previously Approved Project would not require new major infrastructure or improvements that could physically divide an established community, so its impacts would be minimal.

Noise (Sections 4.10.5-4.10.6)

- With the implementation of Mitigation Measures **MM-NOS-1** and **MM-NOS-2**, the Previously Approved Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels above standards established in the local general plan or noise ordinance for transportation, stationary and construction noise sources. Impacts would be **less than significant**.
- Implementation of Mitigation Measure **MM-NOS-3** would ensure future development with the potential for vibration impacts shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. The vibration levels shall not exceed Federal Transit Administration architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). Impacts related to vibration would be **less than significant**.

Population and Housing (Sections 4.11.5-4.11.6)

- The Previously Approved Project would not induce substantial unplanned population growth because all rezones are located within existing developed areas with access to services, roadways and utilities. For each home that may be removed, more housing units would be provided in its place which would accommodate more people and ensure no net loss of housing. Therefore, impacts are **less than significant**, the same as the Previously Approved Project.

Public Services (Sections 4.12.5-4.12.9)

- The payment of the required Development Impact Fees would ensure that future development would provide its fair share of funds for additional fire, police, and school services, parks, and public services.

Paleontological Resources (Section 4.5.9)

- With the implementation of Mitigation Measure **MM-GEO-1**, the Previously Approved Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Impacts would be **less than significant**.

Transportation (Sections 4.13.5, 4.13.7 and 4.13.8)

- The Previously Approved Project would adhere to engineering and policy review that would ensure consistency with applicable policies related to transit, roadway, bicycle, and pedestrian facilities, and therefore would not conflict with a plan, ordinance, or policy addressing the circulation system. The Previously Approved Project does not change the existing roadway network, and therefore would not substantially increase hazards or result in inadequate emergency access. Impacts would be **less than significant**.

Utilities and Service Systems (Sections 4.14.5-4.14.8)

- With the implementation of Mitigation Measure **MM-UTL-1**, the Previously Approved Project would not result in impacts related to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, solid waste, or telecommunications facilities. Future residential projects in the Rezone Sites would be required to adhere to state and local regulations pertaining to utility and service systems. Impacts would be **less than significant**.

Wildfire (Sections 4.15.5-4.15.8)

- All future developments associated with the Previously Approved Project would not substantially impair an adopted emergency response plan or emergency evacuation plan or exacerbate wildfire risk. Future developments would be required to adhere to City regulations and comply with General Plan policies to minimize risks from wildfire, flooding, drainage patterns and landslides. Therefore, impacts would be **less than significant**.

Impacts Found to be Significant and Unavoidable

The analysis in the Draft Program EIR determined that implementation of the Previously Approved Project would result in the following significant and unavoidable impacts even with the implementation of all feasible mitigation measures. These issues are further discussed in Section 19.

- **Air Quality, Section 4.2.5:** The Previously Approved Project would be inconsistent with the San Diego Regional Air Quality Strategy (RAQS) because the buildout of the Rezone Sites would exceed the population estimates assumed for the RAQs. This impact is based on plan inconsistency only. The inconsistency with the RAQS would remain until the RAQS is revised and incorporate the growth projections with the Project.
- **Air Quality, Section 4.2.6:** The Previously Approved Project could result in multiple development projects being constructed at one time, resulting in significant construction-related emissions of criteria air pollutants. Despite adherence to mitigation measure AQ-1, impacts associated with criteria pollutants would remain **significant and unavoidable**.

- **Greenhouse Gas (GHG) Emissions, Sections 4.6.5-4.6.6:** The Previously Approved Project would result in an increase in GHG emissions that would exceed the assumption used in the development of the Sustainable Santee Plan. While the City's Consistency Checklist and implementation of mitigation would minimize GHG impacts associated with future development at the Rezone Sites, impacts would not be fully mitigated. The planned update to the Sustainable Santee Plan may fully mitigate these impacts; however, they currently remain significant and unavoidable.
- **Land Use and Planning, Section 4.9.6:** Impacts associated with policy consistency for future development at the Rezone Sites would be less than significant, except for compatible density. The potential for future development within the Rezone Sites to exceed the density limits for the corresponding airport safety zone is a potentially significant impact. No feasible mitigation is available to reduce the potential conflict between the compatible density within the airport safety zones and the proposed Rezone Sites.
- **Noise, Section 4.10.5:** Impacts on existing sensitive land uses due to the increase in ambient noise levels associated with the buildout of the Rezone Sites would remain significant and unavoidable.
- **Transportation, Section 13.6:** Projected Vehicle Miles Traveled (VMT) per capita with the Project would exceed the City's 85 percent threshold representing a significant impact. While implementation of the mitigation framework (**MM-TRA-1**) would reduce VMT impacts associated with future development at the Rezone Sites, impacts would not be fully mitigated.

13. Proposed Project Description

Tentative Map (TM) 2023-0003

The Proposed Project would subdivide an approximately 4.65-acre parcel into 42 condominium units. Tentative Map (TM-2023-0003) application and Development Review (DR-2023-0007) application for a multifamily residential development consisting of 42 townhomes on a 4.65-acre parcel located at 10939 Summit Avenue (see Figure 6, Illustrative Site Plan).

Access and Circulation

Primary access would be provided via one main entrance from Summit Avenue.

Water Service

The Project will connect to the existing waterlines on Summit Avenue.

Sewer Service

The Project will connect to the existing sewer line on Summit Avenue.

Storm Drainage Improvements

The proposed drainage system will collect surface flows via grate and curb storm drain inlets. Flows will be conveyed via underground storm drains to an underground vault, and then to a modular wetland system located at the southwest corner of the property.

Design Review (DR) 2023-0007

The Project consists of 21 two-plex, three-story buildings with attached garages. Unit sizes range from 1,745 square feet to 2,085 square feet. The Project would provide private driveways, guest parking, recreational areas, common open space, and landscaping.

The components of the Proposed Project are described in Table 1 below.

Table 1: Proposed Project Development Standards

Component	Code Requirement	Provided
Minimum Lot Area	None	4.65 acres
Maximum Lot Coverage	55%	18 %
Density Range	7-14 du/ac	9.03 du/ac
Maximum Building Height	35 feet/3 stories	35-feet/3 stories
Number of Parking Spaces	95 spaces	105 spaces
Minimum Private Open Space	100 square feet/unit	466 square feet/unit
Minimum Active Common Open Space	150 square feet/unit	660 square feet/unit

Table 2: Proposed Project Dwelling Unit Mix

Plan	Unit Type	Square Feet	Number of Units
Plan 1	3BR/Den, 2.5 BA	1,745	21
Plan 2	4BR/Den, 3.5 BA	2,085	21
Total			42

Construction Activities

Construction activities include site preparation (ground clearing and removal of all vegetation); grading of the entire Project site, and installation of building footings, utility lines, and underground infrastructure, construction (construction of new houses), paving, landscaping, and finishing (paving streets, installing perimeter fencing, installing landscaping, and finishing the homes). Construction equipment and staging are to occur on-site, and construction vehicle access is planned via Summit Avenue. Construction of the Project is estimated to take 21 months and is expected to begin in the 4th quarter of 2025 or the 1st quarter of 2026.

Operational Characteristics

The Proposed Project would operate as a residential community. Typical operational characteristics would include residents and visitors traveling to and from the site, leisure and

maintenance activities occurring on individual residential lots and in the on-site recreational facilities, and general maintenance of common areas. Low levels of noise and a moderate level of artificial exterior lighting typical of a residential community are expected.

14. Surrounding Land Uses and Setting

The subject rectangular-shaped property comprises level land. The site slopes gently to the west with existing elevations on the order of approximately ±526 feet above mean sea level (msl) along the southwest portion of the site, to ±594 feet above msl along the northeast portion of the site. The northern and southern portions of the subject property are currently the sites of two occupied single-family residences with detached garages.

Grasses and weeds cover most of the subject site. Few trees are located near and around the residences. Vehicular access to the subject property is via dirt and partially paved driveways from Summit Avenue to the subject site. The subject site is secured by short fencing along the perimeter and separating the two addresses.

An unlined shallow drainage channel is located in the northwest corner of the site. Existing detached homes are present to the south with a vinyl fence separating the sites. Overhead communication and electrical lines are located along the west property boundary and extend overhead into the properties. Based on aerial photographic information obtained on Google Earth (1994-2023), the subject site appears mostly unchanged from current conditions, as compared to October 12, 2022, the date of the certification of the PEIR, except for variations in seasonal vegetation and vegetation clearing and dirt roads. The land uses, General Plan, and Zoning are described in Table 3 below.

Table 3: Land Uses, General Plan Land Use Designations, and Zoning Classifications

Location	Current Land Use	General Plan Land Use Designation	Zoning Classification
Site	Vacant land /single-family structure	R-7	R-7 (Medium Density Residential)
North	Residential development	R-7	R-7
South	Residential development	R-1-A	R-1-A
East	Residential development	R-1-A, HL	R-1-A, HL
West	Summit Avenue and vacant land	R-1-A	R-1-A
R-1-A: Low-Density Residential (2-4 Dwelling Units/Gross Acre) R-7: Medium Density Residential (7-14 Dwelling Units/Gross Acre) HL: Hillside/Limited (0-1 Dwelling Units/Gross Acre)			

Source: City of Santee Interactive Map at: <https://egis.cityofsanteeca.gov/portal/apps/sites/#/public/apps/c3248e9bebf84cc884392daf1fdc4b0f/explore>, accessed March 26, 2024. Google Earth Pro.

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

General Construction Permit (San Diego Regional Water Quality Control Board)

16. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?

Yes. The consultation process was conducted as part of the Draft Environmental Impact Report for the City of Santee Housing Element Rezone Program Implementation.

17. New significant environmental effects or substantially more severe significant environmental effects compared to those identified in the previous CEQA document.

No environmental subject areas are checked below, because no effects were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances, or new information of substantial importance, as indicated on the following pages.

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

18. Determination

Section 15164 Determination

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous approved ND or MND or certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted ND or MND or previously certified EIR adequately discusses the potential impacts of the project without modification.

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous approved ND or MND or certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted ND, MND, or previously certified EIR adequately discusses the potential impacts of the project; however, minor changes require the preparation of an **ADDENDUM** to the ND, MND, or EIR.
- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous environmental document due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However, only minor changes or additions or changes would be necessary to make the previous EIR adequate for the project in the changed situation. Therefore, a SUPPLEMENTAL ND, MND, or EIR is required.
- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous environmental document due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT ND, MND, or EIR is required.

Section 15183 Determination

- I find that the proposed Project WOULD NOT result in: 1) a peculiar impact that was not identified as a significant impact under the prior EIR; 2) a significant impact that was not analyzed as significant in the prior EIR or a substantial increase in the severity of a significant impact; 3) a potentially significant offsite impact or cumulative impact not discussed in the prior EIR; or 4) a more severe impact due to substantial new information that was not known at the time the prior EIR. NO FURTHER ACTION is required, and a Notice of Exemption will be filed indicating that the project IS ELIGIBLE for an EXEMPTION under CEQA Guidelines Section 15183 and a Notice of Determination will be filed indicating the project IS ELIGIBLE for tiering under CEQA Guidelines Section 15168.
- I find that the proposed Project would result in: 1) a peculiar impact that was not identified as a significant impact under the prior EIR; 2) a significant impact that was not analyzed as significant in the prior EIR or a substantial increase in the severity of a significant impact; 3) a potentially significant offsite impact or cumulative impact not discussed in the prior EIR; or 4) a more severe impact due to substantial new information that was not known at the time the prior EIR. I find that FURTHER ENVIRONMENTAL REVIEW is necessary to analyze those effects that are subject to CEQA, and therefore, this Project is NOT ELIGIBLE for an EXEMPTION under CEQA Guidelines Section 15183 or for tiering under CEQA Guidelines Section 15168.

Signature

Date

Printed Name

Figure 1: Site Location Map

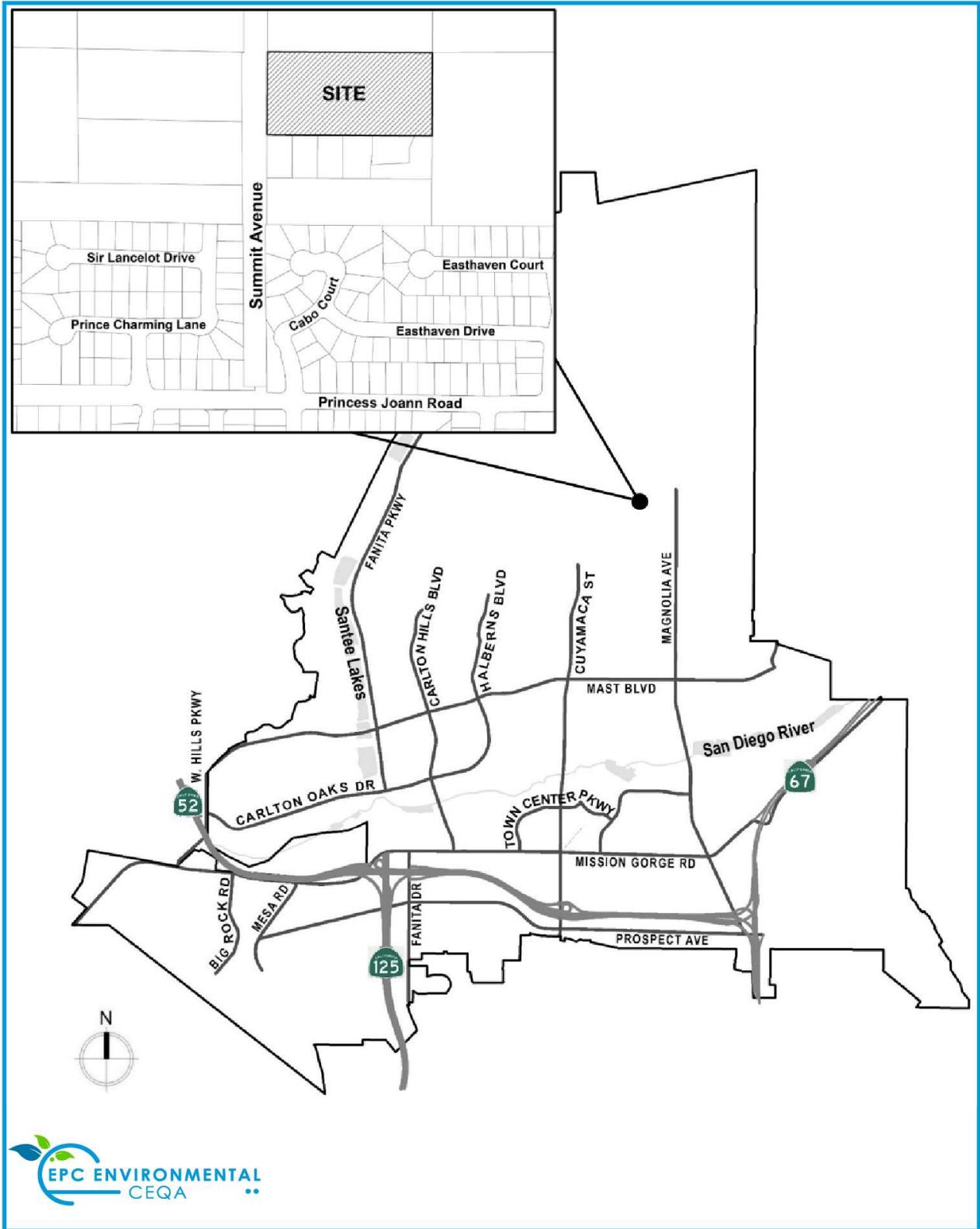


Figure 2: Project Site / Aerial Photo



Figure 3: Street View from Summit Avenue Looking East



Figure 4: Housing Element Rezone Sites

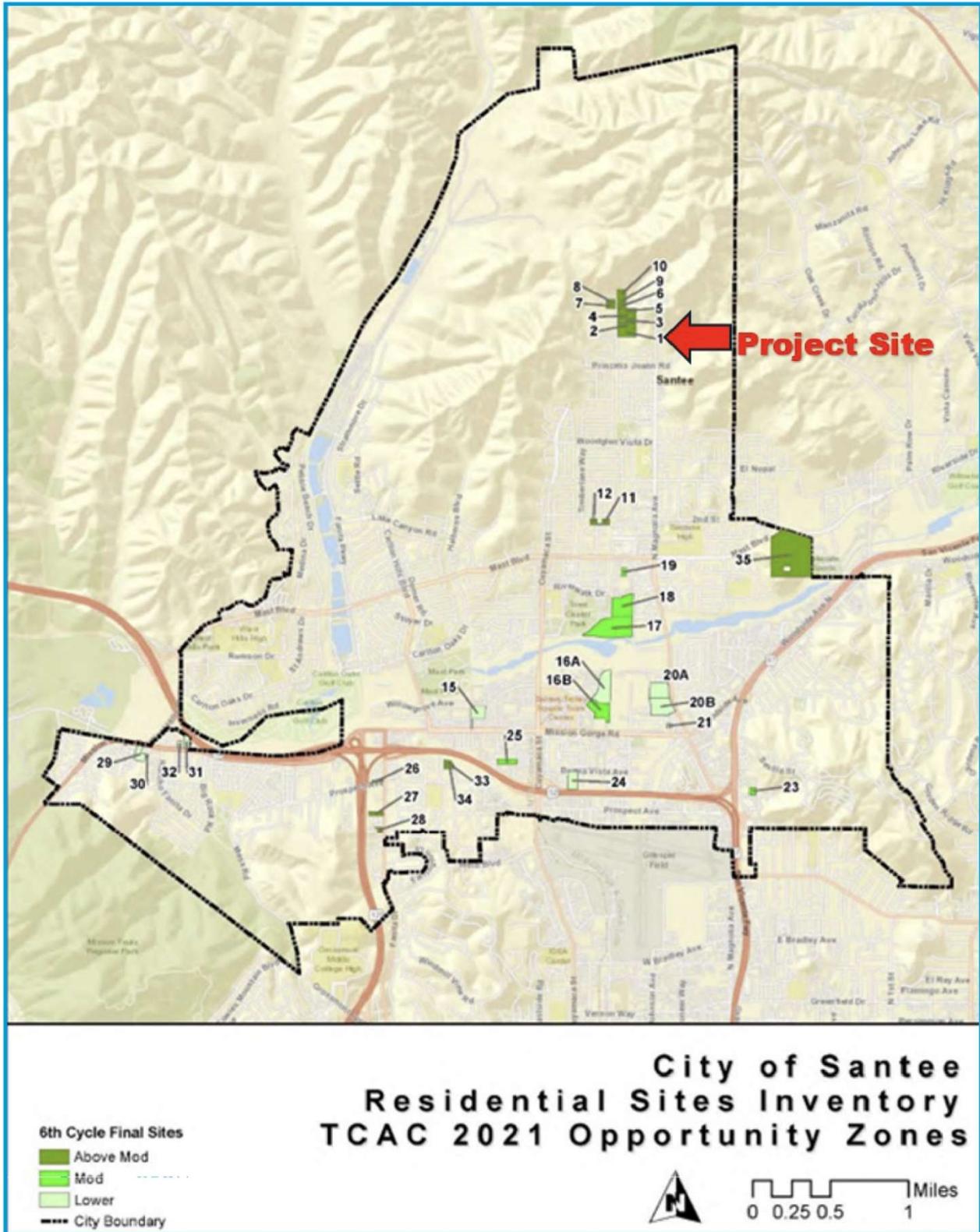


Figure 5: Tentative Tract Map No.2023-0003

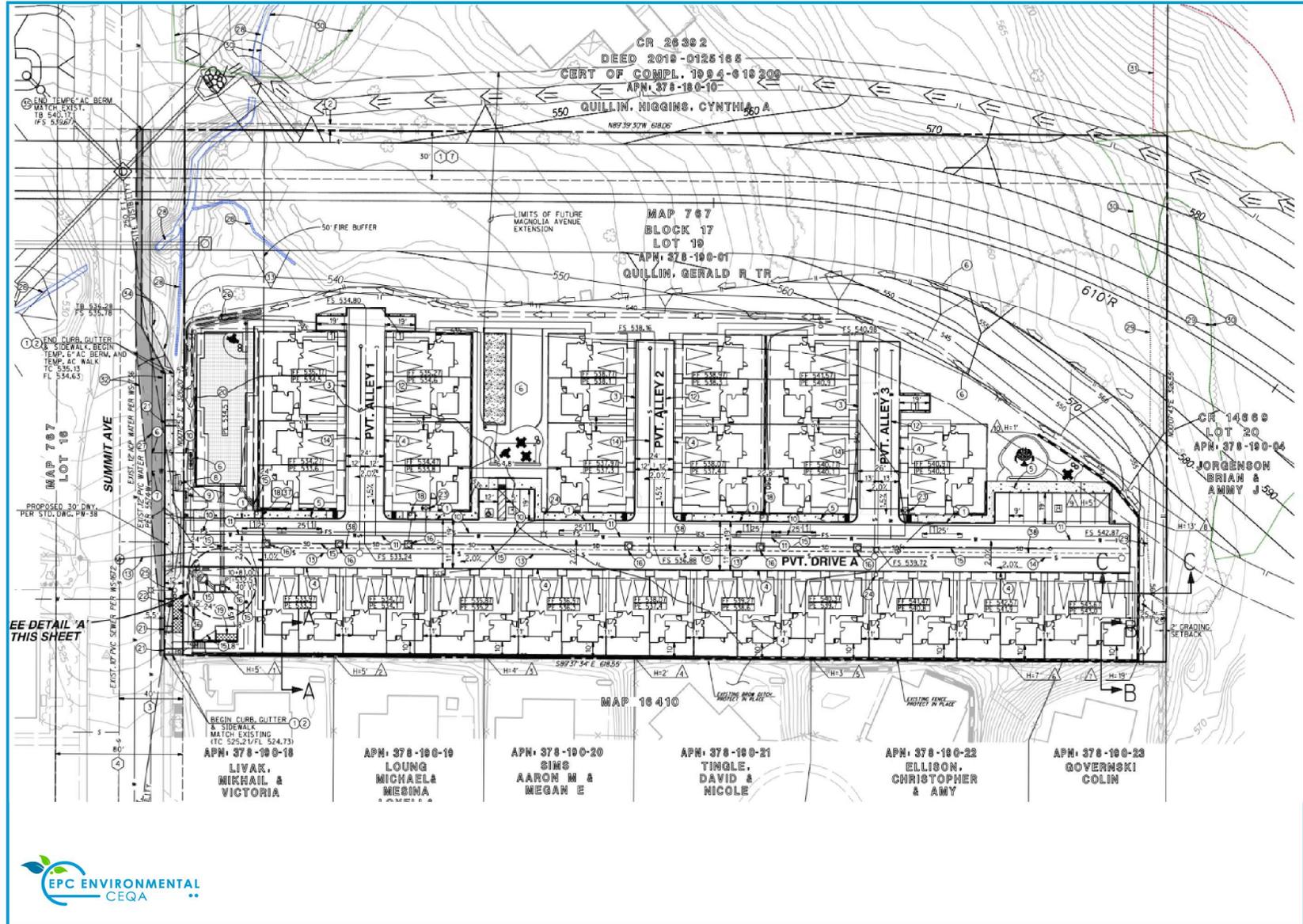


Figure 6: Illustrative Site Plan



Figure 7: Dwelling Unit Mix



Figure 8: Typical Architectural Elevations



PERSPECTIVE 1



PERSPECTIVE 2



Figure 9: Open Space Requirements



19. Evaluation of Environmental Impacts

The evaluation in this document uses the following methodology.

CEQA Guidelines Section 15168 – Program EIR

A major component of the Housing Element was the Sites Inventory, which identified 34 suitable sites throughout the City that could adequately accommodate the required housing capacity set forth by the City's RHNA, which for the 2021-2029 6th Cycle planning period is 1,219 housing units (see Figure 4, Housing Element Rezone Sites). The PEIR included evaluating the potential environmental effects associated with the future development of the 34 sites listed on the Housing Element Sites Inventory. The subject site was identified as Site 1 in the Housing Element Sites Inventory (see Figure 4).

As stated in the PEIR, "As allowed in CEQA Guidelines §15168, Program EIR, future development proposals within the project areas will be reviewed by the City in light of the Final PEIR. The PEIR and subsequent project review process, defined in Section 15168 of the CEQA Guidelines, allows a PEIR to serve as the basis for environmental review of subsequent projects. Sections 15182 and 15183 of the CEQA Guidelines provide additional review guidance for projects proposed in accordance with an adopted specific plan, or consistent with an adopted community plan, general plan, or zoning."²

Methodology: This analysis was tiered off the PEIR for evaluating the development of Rezone Site 1 to ensure compliance with applicable regulations and mitigation framework included in the PEIR.

CEQA Guidelines Section 15164 – Addendum to an EIR

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency 's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

² PEIR, p. 1-6.

Methodology: The Section 15164 Analysis provides a determination of whether the Project would result in:

- New Potentially Significant Impact?
- New Mitigation is Required?
- No New Impact/No Impact?
- Reduced Impact?

Finding: An Addendum was prepared in compliance with this Section because development of Rezone Site 1 **does not** involve:

- Substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

CEQA Guidelines Section 15183 – Projects Consistent with a Community Plan or Zoning

Projects that are consistent with the development density established by existing zoning or general plan policies for which an EIR was certified shall not require additional environmental review except as might be necessary to examine whether there are project specific significant effects which are peculiar to the project or its site. As outlined in CEQA Guidelines §15183(d), this section applies to projects that meet the following conditions:

1. The project is consistent with:
 - a. A community plan adopted as part of a general plan,
 - b. A zoning action that zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or
 - c. A general plan of a local agency, and
2. An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan. Additionally, the additional environmental review exemption applies only to the extent that all feasible mitigation measures identified in the applicable general plan are implemented by the public agency with jurisdiction to require such mitigation measures (CEQA Guidelines Section 15183(e)).

Methodology: The Checklist contained in this document discusses whether the Proposed Project is consistent with the environmental impact conclusions and mitigation measures contained in the PEIR certified for the Approved Project.

Finding: In addition to the Addendum analysis, the Proposed Project qualifies for the exemption because the following findings can be made.

1. The Project is consistent with the development density established by the Approved Project for Rezone Site 1 (General Plan Land Use Designation of R-14 and Zoning Classification of R-7).
2. There are no Project-specific effects that are peculiar to Rezone Site 1 and that the PEIR failed to analyze as significant effects. The Rezone Site 1 is similar to other properties in the area, including its land use designation and zoning. The property does not support any peculiar environmental features, and the Proposed Project would not result in any peculiar effects. In addition, as explained further in this document, the Proposed Project impacts were adequately analyzed by the PEIR.
3. There are no potentially significant off-site and/or cumulative impacts that the PEIR failed to evaluate. The Proposed Project is consistent with the density and land use characteristics of the development considered by the PEIR and would represent a small part of the growth that was forecasted for the build-out of the Countywide Policy Plan. The PEIR considered the incremental impacts of the Project, and as explained further in the Checklist below, no potentially significant off-site or cumulative impacts have been identified that were not previously evaluated.
4. There is no substantial new information that results in more severe impacts than anticipated by the PEIR. As substantiated in the Checklist below, no new information has been identified that would result in a determination of a more severe impact than what had been anticipated by the PEIR.
5. The Proposed Project will implement all applicable mitigation measures specified in the PEIR as explained in the Checklist through Project design, compliance with regulations and ordinances, the Proposed Project's conditions of approval, and City permit processing.

19.1 Aesthetics

This section corresponds with the Previous Approved PEIR Section 4.1, *Aesthetics*.

1. Section 15164 Analysis

a) Would the Project have a substantial adverse effect on a scenic vista?

Previously Approved Project Impact – Less than Significant

Major views throughout the City include the San Diego River and surrounding mountains and hillsides. The City places a high value on protecting these views, as they create a sense of place that defines the City. The PEIR found that a change in zoning from R1-A to R-7 affecting Rezone Site 1 would change the rural character of this area, but views of the surrounding hillsides would continue to be visible from this low-lying area because the requirement for Development Review consistent with Municipal Code Chapter 13.08 would ensure consistency with General Plan policies. This review requires an evaluation of project consistency with development review criteria defined in Municipal Code §1308.070, including an evaluation of the relationship of the building site to the surrounding area.

Proposed Project Impact – Less than Significant

Scenic vistas are points or corridors that are accessible to the public and that provide a view of scenic areas and/or landscapes. The hillside located to the northeast of the Project is considered a scenic vista and is visible from the public right-of-way of Summit Avenue. The R-7 Zone development standards contained in the Zoning Code will limit building height to 35 feet, the lot coverage to 55%, and provide building setbacks between structures ranging from ten to twenty feet, would serve to limit blocking the existing views of the Hillside. There are no new or more severe impacts that were not previously evaluated in the EIR.

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

Previously Approved Project Impact – Less than Significant

The PEIR found that there are no designated State Scenic Highways within the City limits. Only SR-52, located west of the City limits, is a designated State Scenic Highway that runs in an east-west direction approximately 1.8 miles south of the southern Project site boundary. Due to its distance and intervening topography, the Project site would not be seen from this location. For both ministerial and discretionary development of the Rezone Sites, adherence to the requirement for development review consistent with Municipal Code Chapter 13.08 would ensure consistency with the General Plan. Application of these regulatory requirements would ensure that future development would not degrade scenic resources.

Proposed Project Impact – No Impact

The Project site is not located within or adjacent to a State Scenic Highway. There are no officially designated State Scenic Highways within the City boundaries or near the Project site.

Some scattered trees exist throughout the Project site, but these trees do not represent significant scenic resources, because they are not large stands of mature trees. No other notable natural scenic resources (e.g., large rock outcroppings, major drainages, or prominent landforms) occur on the Project site. As discussed above in 16.1a), there are no designated scenic resources within or adjacent to the Project site. **There are no new or more severe impacts that were not previously evaluated in the EIR.**

c) Would the Project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Previously Approved Project Impact – Less than Significant with Mitigation Incorporated

The PEIR found that adherence to regulatory requirements including Development Review consistent with Municipal Code Chapter 13.08 would ensure that future development would not substantially degrade scenic resources. Impacts for ministerial and discretionary development on Rezone Sites would be less than significant for all sites except Sites 20A and 20B. Future development at the Rezone Sites in proximity to the Polo Barn could result in significant impacts on visual character and quality (Impact VIS-1). As such, PEIR Mitigation Measure CUL-1 was required (refer to CUL-1 in Section 19.4, Cultural Resources).

Proposed Project Impact – Less than Significant

Rezone Site 1 is located 1.7 miles to the north of the Polo Barn, so CUL-1 does not apply. According to Public Resources Code §21071.21071, “Urbanized area” means either of the following:

- (a) An incorporated city that meets either of the following criteria:
 - (1) Has a population of at least 100,000 persons.
 - (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.

Together with the adjacent City of El Cajon, the combined population was 163,336 as of January 2024.³ As such, the Proposed Project design was evaluated to determine consistency with applicable regulations governing scenic quality through the City’s design review procedures.

The Project consists of 21 two-plex, three-story buildings with attached garages. Unit sizes range from 1,745 square feet to 2,085 square feet. The Project would provide private driveways, guest parking, recreational areas, common open space, and landscaping.

³ California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024 <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/>. Accessed April 16, 2025.

The Proposed Project is consistent with the City's development standards described in Table 4, Proposed Project Compliance with Development Standards, below.

Table 4: Proposed Project Compliance with Development Standards

Component	Code Requirement	Provided
Minimum Lot Area	None	4.65 acres
Maximum Lot Coverage	55%	18 %
Density Range	7-14 du/ac	9.03 du/ac
Maximum Building Height	35 feet/3 stories	35-feet/3 stories
Number of Parking Spaces	95 spaces	105 spaces
Minimum Private Open Space	100 square feet/unit	466 square feet/unit
Minimum Active Common Open Space	150 square feet/unit	660 square feet/unit

Additionally, the City required the Project Proponent to submit a Development Review application (DR-2023-0007) to determine compliance with the City's development regulations governing scenic quality. These regulations include the following:

- Landscaping buffers, screens, site breaks, and use of compatible building colors and materials.
- Building designs that include variations in rooflines and wall planes, and incorporate windows, doors, projections, recesses, arcades and/or other building details to avoid large wall surfaces.

As shown in Figure 6, Illustrative Site Plan, and Figure 9, Open Space Requirements, the Proposed Project provides recreational areas, common open space, and landscaping throughout the development. Per code, the minimum active common open space is 150 feet per dwelling unit (42 dus x 150 feet = 6,300 square feet). The Proposed Project provides 19,572 square feet (466 sf per du).

As shown in Figure 8, Typical Architectural Elevations, the building exteriors include variations in rooflines and wall planes, and incorporate windows, doors, projections, recesses, arcades and/or other building details.

Planning staff and the other City Departments and Divisions have reviewed the Proposed Project through the City's internal application review process. This review process enables various City Departments and Divisions (i.e., Planning, Building, Public Works/ Engineering, Police, and Fire Department) to thoroughly evaluate land use development proposals for conformity with the provisions established in the City's Municipal and Zoning Code.

Based upon the review of the Proposed Project's Development Review application, staff has determined that the proposed site improvements conform to the City's regulations governing scenic quality.

d) Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Previously Approved Project Impact – Less than Significant

Adherence to regulatory requirements would ensure that future development would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the Project areas.

Proposed Project Impact – Less than Significant

The lighting proposed for the Project would consist of security and accent lighting typical of single-family homes and will comply with Santee Municipal Code standards related to light and glare (Chapter 13.08.070(G)), which requires that outdoor lighting be directed away from adjacent properties and set in a way to avoid any detriment to the surrounding area. Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light by highly polished surfaces such as window glass or reflective materials. The exterior building materials primarily consist of stucco, wood, and tile roofs. Windows are not a primary element of the exterior features, so impacts from glare are minimal. There are no new or more severe impacts that were not previously evaluated in the EIR.

2. Findings

Section 15183

As demonstrated in the analysis above, impacts relating to Aesthetics would be less than significant because the Proposed Project meets the applicable site design requirements, architectural guidelines, and outdoor lighting standards per City regulations. Therefore, the following findings can be made.

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required.

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.2 Air Quality

This section corresponds with the Previous Approved PEIR Section 4.2, *Air Quality*.

1. Section 15164 Analysis

a) Would the Project conflict with or obstruct the implementation of the applicable air quality plan?

Previously Approved Project Impact – Significant and Unavoidable

The PEIR determined that future development at the Rezone Sites would increase development and traffic generation over what would occur under the buildout of the adopted zoning and land use designations and would therefore increase anticipated air emissions. Therefore, the buildout of the project would exceed the assumptions used to develop the Regional Air Quality Strategy (RAQS), resulting in a significant and unavoidable impact.

Proposed Project Impact – Significant and Unavoidable

The Proposed Project would be inconsistent with the RAQS because the buildout of Rezone Site 1 under the R-14 General Plan Land Use Designation and R-14 Zoning Classification would exceed the population estimates for the R-1A Zoning Classification assumed for the RAQS. This impact is based on plan inconsistency only, as emissions with the Proposed Project would not exceed stated thresholds as shown in Table 5 and Table 6 below. As a result, no mitigation measures are available that would reduce impacts associated with inconsistency with the RAQS's population projections. There are no new or more severe impacts that were not previously evaluated in the EIR.

b) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Previously Approved Project Impact – Significant and Unavoidable

Construction and operational emissions associated with the individual Rezone Sites (both by-right and discretionary development) would be less than the applicable project-level screening thresholds for all criteria pollutants. Therefore, project-level impacts for each Rezone Site would be less than significant. However, the scale and extent of construction activities associated with the buildout of the Rezone Sites may result in some instances where future development would occur simultaneously and would cumulatively exceed the relevant thresholds. Therefore, cumulative construction-related regional air quality impacts would be potentially significant (Impact AQ-2). Operation of the Project would result in a cumulatively considerable net increase in emissions compared to the emissions that would occur under existing land use designations. At the program level, because the Project would conflict with the implementation of the RAQS, air quality impacts related to the cumulative net increase in criteria pollutants would be significant (Impact AQ-1). The following mitigation measure was included in the Final PEIR.

PEIR MM-AQ-1: *The City shall require project applicants to identify the measures that would be taken at the construction site to reduce construction-related criteria air pollutants such that they do not exceed the SDAPCD screening thresholds. Based on typical construction*

emissions, implementation of the following measures would be sufficient to reduce air pollutant emissions during construction:

- Requiring fugitive dust control measures that exceed SDAPCD’s Rules 52, 54, and 55 such as:
- Requiring the use of non-toxic soil stabilizers to reduce wind erosion. Applying water every four hours to active soil-disturbing activities.
- Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) emission limits, applicable for engines between 50 and 750 horsepower.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer’s standards.
- Limiting non-essential idling of construction equipment to no more than five consecutive minutes

Proposed Project Impact – Less than Significant with Mitigation Incorporated

Construction and operational emissions associated with Rezone Site 1 were modeled assuming that a maximum of 50 dwelling units (which is greater than the 42 units proposed and is thereby more conservative) using the CalEEMod and compared against the significance thresholds established by the SDACD as shown in Table 5 and Table 6 below.

Table 5: Construction Emissions Summary

Construction Phase	Maximum Emissions for 50 Dwelling Units (lbs/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2024 Maximum	4.0	58.3	41.4	0.15	13.7	6.8
2025 Maximum	1.8	17.2	18.9	0.03	3.8	2.1
2026 Maximum	0.7	6.2	9.6	0.01	0.4	0.3
SDAPCD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded	No	No	No	No	No	No

Source: Air Quality and Greenhouse Gas Study, Birdseye Planning Group (Appendix B).

Table 6: Operational Emissions Summary

	Estimated Emissions for 50 Dwelling Units (lbs/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	1.4	0.02	2.8	0.0001	0.0010	0.0010
Energy	0.01	0.17	0.07	0.001	0.0138	0.0138
Mobile	1.6	1.2	12.5	0.03	2.6	0.6
Maximum	3.1	1.4	15.5	0.03	2.7	0.7
SDAPCD Thresholds	75	250	550	250	100	55
Threshold Exceeded	No	No	No	No	No	No

Source: Air Quality and Greenhouse Gas Study, Birdseye Planning Group (Appendix B).

As shown in Table 5, construction emissions associated with Rezone Site 1 would be less than the applicable project-level screening thresholds for all criteria pollutants. Therefore, project-level impacts for Rezone Site 1 would be less than significant. However, the scale and extent of construction activities associated with the buildout of all of the Rezone Sites may result in some instances where future development would occur simultaneously and would cumulatively exceed the relevant thresholds. Therefore, the PEIR concluded that the cumulative construction-related regional air quality impacts would be potentially significant (Impact AQ-2). Although construction emissions are significantly below SDAPCD thresholds, the Proposed Project would implement **PEIR Mitigation Measure MM-AQ-1** to further reduce these less than significant impacts to the maximum extent feasible.

At the program level, because the Project (i.e. General Plan) would conflict with the implementation of the RAQS, air quality impacts related to the cumulative net increase in criteria pollutants would be significant and unavoidable (Impact AQ-1). However, as shown in Table 5, the operation of the Proposed Project would not result in exceeding San Diego County Air Pollution Control District (SDAPCD) emissions thresholds at the Project level. There are no new or more severe impacts that were not previously evaluated in the EIR.

c) Would the Project expose sensitive receptors to substantial pollutant concentrations?

Previously Approved Project Impact – Less than Significant

Generation of diesel particulate matter (DPM) from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (Office of Environmental Health Hazard Assessment 2015). Therefore, if the duration of proposed construction activities near any specific sensitive receptor were a year, the exposure would be three percent of the total exposure period used for health risk calculation. Considering this assessment methodology, the highly dispersive nature of DPM, and the fact that construction activities would occur intermittently and

at various locations over the lifetime of Project buildout, DPM generated by construction would not create conditions where the probability is greater than 10 in 1 million of developing cancer for the Maximally Exposed Individual, or to generate ground-level concentrations of non-carcinogenic toxic air contaminants (TACs) that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual.

Additionally, with the ongoing implementation of U.S. EPA and CARB requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types; the DPM emissions of individual equipment would be substantially reduced over the years as project buildout continues. Therefore, the Project would not expose sensitive receptors to toxic air emissions during construction of future development at the Rezone Sites.

Proposed Project Impact - Less than Significant

Rezone Site 1 is 4.65 acres in size and has a construction duration of approximately 17 months; however, only a portion of the overall construction work would require the use of diesel-powered equipment. The Proposed Project would not result in long-term (i.e., 30 or 70 years) exposure to a substantial source of toxic air contaminant emissions; and thus, would not be exposed to the related individual cancer risk. Therefore, no significant toxic air contaminant impacts would occur during the construction of the Proposed Project. There are no new or more severe impacts that were not previously evaluated in the PEIR.

d) Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?)

Previously Approved Project Impact – Less than Significant

Emissions from construction equipment, such as diesel exhaust, and volatile organic compounds (VOCs) from architectural coatings and paving activities, may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. By the time such emissions reach a receptor (e.g., people in residential units, day care centers, schools, and nursing homes), they would be diluted to well below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Therefore, construction would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant. Once operational, future development implemented under this alternative would include residential and associated retail uses that generally are not a source of objectionable odors.

Proposed Project Impact – Less than Significant

Land uses typically associated with objectionable odors are agriculture, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, and dairies. The Proposed Project is a residential use that does not produce objectionable odor impacts. There are no new or more severe impacts that were not previously evaluated in the EIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Air Quality would be less than significant. However, although the Proposed Project's construction emissions are below the significance levels of the SDAPCD, the Project will implement **PEIR Mitigation Measure MM-AQ-1** to reduce construction emissions to the maximum extent feasible. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.

The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.3 Biological Resources

This section corresponds with the Previous Approved PEIR Section 4.3, *Biological Resources*.

1. Section 15164 Analysis

-
- a) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**
-

Previously Approved Project Impacts – Less Than Significant with Mitigation Incorporated

The PEIR determined that direct impacts to sensitive plant and wildlife species could potentially result from the removal of occupied habitat within undeveloped or substantially unimproved sites through grading and other land development activities. Additionally, indirect impacts to sensitive plant or wildlife species could also result from excess noise, lighting, or runoff generated during Project construction. Future development at the Rezone Sites would result in potentially significant impacts on sensitive plants, sensitive wildlife, jurisdictional waters/wetlands, riparian habitat, and migratory or nesting birds. Mitigation Measures **PEIR MM-BIO-1** through **PEIR MM-BIO-4** were required.

PEIR MM-BIO-1. *Applications for future development, where the City has determined a potential for impacts to sensitive biological resources, shall be required to comply with the following mitigation measures.*

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

If suitable habitat for sensitive species is identified based on the general biological survey, then focused presence/absence surveys shall be conducted in accordance with applicable resource agency survey protocols and incorporated into the biological resources report. If potentially significant impacts to sensitive biological resources are identified, project-level grading and site plans shall incorporate project design features to avoid or minimize direct impacts on sensitive biological resources to the extent feasible, and the report shall also recommend appropriate mitigation to reduce the impacts to below a level of significance, where feasible. Mitigation measures shall be

consistent with the standards contained in Section 5.3 of the 2018 Draft Santee Subarea Plan, and projects shall be required to obtain all necessary permits to ensure compliance with applicable federal, state, and local regulations, such as the Federal and State Endangered Species Acts.

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

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

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

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

Best Management Practices. During future project construction activities, the following best management practices (BMPs) shall be implemented:

- All equipment maintenance, staging, and dispensing of fuel, oil, or any other such activities shall occur in developed or designated non-sensitive upland habitat areas*
- The designated upland areas shall be located to prevent runoff from any spills from entering waters of the US.*
- A construction Storm Water Pollution Prevention Plan (SWPPP) and a soil erosion and sedimentation plan shall be developed (where requirements are met) to minimize erosion and identify specific pollution prevention measures that shall eliminate or*

control potential point and nonpoint pollution sources onsite during and following the project construction phase. The SWPPP shall identify specific BMPs during project construction to prevent any water quality standard exceedances. In addition, the SWPPP shall contain provisions for changes to the plan such as alternative mechanisms, if necessary, during project design and/or construction to achieve the stated goals and performance standards.

- Trash shall be stored in closed containers so that it is not readily accessible to scavengers and shall be removed from the construction site on a daily basis.
- Water quality shall be visually monitored by the biological monitor to ensure that no substantial increases in turbidity occur during construction.
- All relevant natural resource permits and authorizations shall be obtained from appropriate agencies (i.e., USACE, RWQCB, and CDFW) prior to the initiation of construction activities. Permit conditions contained within the permits and authorizations shall be employed throughout the duration of the project.
- Hydrologic connectivity shall be maintained within drainages during the duration of construction. Brush, debris material, mud, silt, or other pollutants from construction activities shall not be placed within drainages and shall not be allowed to enter a flowing stream.
- Dust control measures shall be implemented by the contractor to reduce excessive dust emissions. Dust control measures shall be carried out at least two times per day on all construction days, or more during windy or dry periods, and may include wetting work areas, the use of soil binders on dirt roads, and wetting or covering stockpiles.
- No pets shall be allowed in, or adjacent to, the project sites.
- Rodenticides, herbicides, insecticides, or other chemicals that could potentially harm wildlife or native plants shall not be used near or within Environmentally Sensitive Areas within or near the roadway segments.
- Construction equipment shall be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site during the course of construction.
- The cleaning of equipment will occur at least 300 feet from ESA fencing
- Use of Native Plants. All project-related planting and landscaping shall not use plants listed on California Invasive Plant Council (Cal-IPC). Locally native plants shall be used near open space and native areas to the greatest extent feasible.

PEIR MM-BIO-2: Applications for future development, wherein the City has determined a potential for impacts to least Bell's vireo, shall be required to comply with the following mitigation framework.

Prior to issuance of a permit for grading or vegetation removal, USFWS protocol surveys for least Bell's vireo shall be required should project construction occur within 300 feet of riparian habitat during the breeding season (April 10 to July 31). If least Bell's vireo are identified during the protocol surveys, then noise Attenuation measures shall be required to ensure that noise levels from construction do not exceed a 60 dB(A) hourly average per hour at the edge of the riparian habitat or to the ambient noise level if it exceeds 60 dB(A) prior to construction. Construction noise monitoring shall be required to verify that noise levels at the edge of

occupied habitat are maintained below 60 dB(A) hourly average unless an analysis completed by a qualified acoustician shows that noise generated by construction activities would not exceed 60dB(A) hourly average at the edge of occupied habitat.

PEIR MM-BIO-3: Applications for future development, where the City has determined a potential for impacts to coastal California gnatcatcher, shall be required to comply with the following mitigation framework.

Prior to issuance of a permit for grading or vegetation removal, USFWS protocol surveys for coastal California gnatcatcher shall be required where project construction is proposed within 300 feet of coastal sage scrub or chaparral habitat during the breeding season (March 1 through August 15). If coastal California gnatcatcher are identified during the protocol surveys, then noise attenuation Measures shall be required to ensure that noise levels from construction do not exceed a 60 dB(A) hourly average per hour at the edge of the coastal sage scrub or chaparral habitat or to the ambient noise level if it exceeds 60 dB(A) prior to construction. Construction noise monitoring shall be required to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average unless an analysis completed by a qualified acoustician shows that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat.

PEIR MM-BIO-4: Applications for future development, where the City has determined a potential for impacts to mature trees and/or native vegetation suitable for nesting birds, shall be required to comply with the following mitigation framework:

If any construction commences during the bird breeding season, a preconstruction survey for nesting birds shall occur within three days prior to construction activities by an experienced avian biologist. The survey shall occur within all suitable nesting habitat within the project impact area and a minimum 250-foot buffer (or as otherwise mandated by wildlife agencies [CDFW and USFWS]). If nesting birds are found, an avoidance area shall be established, in consultation with the wildlife agencies as appropriate, by a qualified biologist around the nest until a qualified avian biologist has determined that young have fledged, or nesting activities have ceased. The project site shall be re-surveyed if there is a lapse in construction activities for more than 3 days.

Proposed Project Impact – Less than Significant with Mitigation Incorporated

As required by **PEIR MM-BIO-1**, a site-specific general biological resources survey was conducted for Rezone Site 1 to identify the presence of any sensitive biological resources, including any sensitive plant or wildlife species (Appendix C). Based on the site-specific survey covering Rezone Site 1, the following plant and wildlife species were analyzed.

Plant Species

No sensitive plant species were observed or determined to have a high potential to occur in the survey area. Further, the areas containing Diegan coastal sage scrub (including disturbed), non-native woodland, non-vegetated channels, and disturbed habitat on the Project site have a low potential to support sensitive plant species, and only portions of non-native woodland and disturbed and developed areas will be impacted on Rezone Site 1. Therefore, the Proposed Project

implementation would not result in direct or indirect impacts to sensitive plant species. Impacts on sensitive plant species would be less than significant, and no mitigation is required. There are no new or more severe impacts that were not previously evaluated in the EIR.

Wildlife Species

No sensitive wildlife species were observed during the survey; however, development on Rezone Site 1 has the potential to result in direct and indirect impacts on six sensitive wildlife species that have a high potential to occur in the survey area: Belding's Orange-throated Whiptail; Blainville's Horned Lizard; Coastal California Gnatcatcher; Crotch's Bumblebee; Monarch Butterfly; and Red Diamond Rattlesnake. Of these species, all were evaluated in the General Plan EIR, with the exception of the Monarch Butterfly (monarchs), Blainville's Horned Lizard, and Red Diamond Rattlesnake, which are discussed below.

As noted in the General Plan EIR, future development of Rezone Sites 1, 2, 3, 4, 5, 8, 10, 15, 16A, 16B, 17, 18, 19, 20A, 20B, and 35 could result in direct and/or indirect impacts to sensitive plants and sensitive wildlife. Because the PEIR conducted a program level of analysis, there were no Project-specific development plans to review that would allow for site-specific impact identification and/or avoidance. Future development would proceed based on the timing and proposed designs of individual property owners. Mitigation Measure **PEIR MM-BIO-1** stipulates that if suitable habitat for sensitive species is identified based on a general biological survey, focused presence/absence surveys shall be conducted in accordance with applicable resource agency survey protocols and incorporated into the biological resources report for a future project. If potentially significant impacts to sensitive biological resources are identified, project-level grading and site plans shall incorporate Project Design Features (PDFs) to avoid or minimize direct impacts on sensitive biological resources to the extent feasible, and the report shall also recommend appropriate mitigation to reduce the impacts to below a level of significance, where feasible.

Monarch Butterfly

In 2014, monarchs were petitioned to be listed under the federal Endangered Species Act. In December 2020, the U.S. Fish and Wildlife Service found that listing was warranted but precluded by other listing actions on its National Priority List. A 90-day public comment period was open from December 12, 2024 to March 12, 2025 (view comments for this period). The comment period has been reopened for 60 days (view and submit comments for this period), closing on May 19, 2025, after which the USFWS will evaluate the comments received and any other relevant new information. The final rule will be posted within a year (by December 12, 2025), and rules typically become effective 30 days after posting. That means that there are no implications for Monarch Watch programs at the present time.⁴

In California, monarchs are included on the California Department of Fish and Wildlife's (CDFW) Terrestrial and Vernal Pool Invertebrates of Conservation Priority list and identified as a Species of Greatest Conservation Need in California's State Wildlife Action Plan. California law (Fish and Game

⁴ <https://monarchwatch.org/listing/>

Code §1002) prohibits the take or possession of wildlife for scientific research, education, or propagation purposes without a valid Scientific Collection Permit (SCP) issued by CDFW.

Mature ornamental trees, including eucalyptus and pines, are present in the survey area, and surrounding areas would provide suitable overwintering habitats for monarchs. No milkweed patches were observed in the survey area that would be suitable for monarch butterfly caterpillars to occupy, but numerous landscape/ornamental plants throughout the survey area could provide nectar sources for this species in addition to 26 Diegan coastal sage scrub species in the northern, eastern, and northeastern portions of the survey area. No historical locations occur within 1 mile of the survey area. Therefore, **Rezone Site 1-MM-BIO-4: Pre-Construction Overwintering Monarch Butterfly Survey** has been included in fulfillment of **PEIR MM-BIO-1**.

Red Diamond Rattlesnake

Suitable Diegan coastal sage scrub occurs in the northern, eastern, and northeastern portions of the survey area. The non-vegetated channels, which have connectivity to disturbed Diegan coastal sage scrub in the northern portion of the survey area, are also suitable habitat. A historical location occurs approximately 0.6 mile northwest of the survey area but not within it. However, no impacts are anticipated to this vegetation community as a result of project implementation.

Blainville's Horned Lizard

Diegan coastal sage scrub with loose soils and harvester ants are present in the northern, eastern, and northeastern portions of the survey area. Historical locations occur approximately 0.7 mile north and 0.8 mile northwest of the survey area, but not within it. However, no impacts are anticipated to this vegetation community as a result of project implementation.

Additionally, the following site-specific mitigation measures apply to Rezone Site 1 for wildlife species as shown below with an identification of the corresponding PEIR mitigation measure in parentheses to demonstrate compliance with the PEIR.

Rezone Site 1 – Biological Resources Mitigation Measures

Rezone Site 1 – MM-BIO-1: Qualified Biologist. *The applicant shall retain a qualified biologist who shall be on-site periodically during construction activities that require the implementation of specific measures. The qualified biologist shall be responsible for implementing the following measures:*

- a. *Prior to the commencement of construction, the limits of the project work area shall be clearly delineated with high visibility temporary fencing by a survey crew and checked by a qualified biologist before initiation of vegetation grubbing or removal.*
- b. *The qualified biologist shall periodically inspect staging areas and stored construction materials (especially open pipes) for sensitive species throughout construction. The biologist shall also inspect any dirt stockpiles, pipes, and other construction materials temporarily stored on the project site to confirm they are covered and secured to prevent erosion and use by wildlife species.*
- c. *The qualified biologist shall inspect the construction site to ensure that steep trenches, holes, and excavations during construction to ensure they are covered at night with*

backfill, plywood, metal plates, or other means, and the edges are covered with soils and plastic sheeting such that small wildlife cannot access them. Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighed down by sandbags. These areas may also be fenced to prevent wildlife from gaining access. Exposed trenches, holes, and excavations shall be inspected by construction personnel or the monitor when on-site, twice daily (i.e., each morning and before sealing the exposed area), to monitor for wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route.

- d. A Worker Environmental Awareness Program shall be implemented during construction. Training for the Worker Environmental Awareness Program shall be provided by the qualified monitoring biologist to all personnel working on-site. The training shall include a review of all special-status and protected species that occur or have a high potential to occur, all project design features and protection measures, the responsibilities of each worker, and a reporting framework.
- e. The qualified biologist shall be present during construction activities that occur within 100 feet of aquatic features in the northwestern portion of the survey area to ensure proper use of Best Management Practices and avoidance of non-vegetated channels. **(Implements PEIR MM-BIO-1).**

Rezone Site 1 MM-BIO-2: Pre-Construction Sensitive Avian Surveys. If construction activities are planned to occur during the coastal California gnatcatcher breeding season (February 15 to September 15), then prior to initiating construction activities, a qualified biologist shall be retained to conduct a minimum of three preconstruction surveys to confirm the presence or absence of the species on the project site and within a 500-foot buffer. If at the time the surveys are scheduled, and based on site conditions at that time, the Qualified Biologist may reduce the buffer to no less than 300-feet, which is the buffer recommended by PEIR MM-BIO-1. The surveys shall begin a maximum of 14 days prior to project construction, and one survey shall be conducted the day immediately prior to the initiation of work. If coastal California gnatcatchers are confirmed to be absent within the 500 to 300 feet of planned construction areas, then no additional measures shall be required. If coastal California gnatcatchers are confirmed to be present, the following mitigation measures shall be implemented:

- a. **Avoidance of Breeding Season.** If the results of pre-construction surveys determine the presence of coastal California gnatcatchers within the 500 to 300 feet of the planned construction area, construction activities within 500 to 300 feet of active nesting sites shall be completed outside the species' breeding seasons. If activities at these locations cannot avoid the species breeding seasons, then Rezone Site MM-BIO-2.b shall be implemented.
- b. **Construction Noise Attenuation.** If construction begins during the breeding season (February 15 to September 15), construction noise could affect the breeding of coastal California gnatcatchers. No loud construction noise (exceeding an hourly average of 60 A-weighted decibels, or 3 A-weighted decibels above hourly average ambient noise levels at the nesting site, whichever is higher) may take place within 500 feet of active

nesting sites during the breeding seasons (February 15 to September 15). Noise levels may be mitigated with sound control barriers that are approximately 10 feet in height and placed between construction operations and sensitive habitats. The barriers shall be solid and made of plastic, masonry, wood, fiberglass, steel, or any combination of those materials or other suitable sturdy materials with no cracks or gaps in the walls. Cracks must be filled or caulked. Noise blankets or other covers may be used, provided that they are appropriate to implement noise control.

- c. **Consultation with U.S. Fish and Wildlife Service.** If after implementation of Rezone Site **MM-BIO-2.a** and Rezone Site **MM-BIO-2.b**, construction noise levels cannot be reduced below a 60 A-weighted-decibel hourly average from the edge of occupied breeding coastal California gnatcatcher habitat, then the Project Proponent shall consult with the U.S. Fish and Wildlife Service regarding project-related adverse effects to the species and the preparation of a U.S. Fish and Wildlife Service-approved plan to avoid disturbing nesting coastal California gnatcatcher. The plan shall include measures to avoid disturbing nesting individuals, including noise monitoring and biological monitoring (i.e., nest monitoring)

Rezone Site 1 MM-BIO-3: Nesting Bird Survey. If construction is proposed during the general bird breeding season (January 15 through August 31), a pre-construction survey shall be performed by a qualified biologist approved by the City (or their designee) to determine if any birds are nesting in or immediately adjacent to the Project impact area and a minimum 250-foot buffer (or as otherwise mandated by wildlife agencies [CDFW and USFWS]). The pre-construction nesting bird surveys shall be conducted by a qualified biologist experienced in bird species identification and behavior to ensure that nesting birds are not present on site. The survey shall be conducted no more than 3 days prior to starting Project activities. If surveys show that nesting birds are present, a no-work buffer shall be placed around the nest. The buffer size shall be determined by the qualified biologist and may vary based on site conditions and types of work to be conducted. The no-work buffer shall be maintained until the end of the bird breeding season or until surveys by a qualified biologist confirm that fledglings are no longer dependent on the nest. If no nesting birds are detected during pre-construction surveys, no restrictions shall be necessary, and construction may proceed as planned.

Rezone Site 1 MM-BIO-4: Pre-Construction Overwintering Monarch Butterfly Survey. If grubbing, trimming, or clearing of vegetation occurs during the winter (November 1 through February 28), a qualified biologist, as approved by the City, shall perform a pre-construction overwintering monarch butterfly survey no more than 48 hours before the start of vegetation grubbing, trimming, or clearing to confirm that no overwintering monarch butterflies occupy vegetation on the Project site. If overwintering monarch butterflies are found during the pre-construction survey, a 50-foot buffer around the occupied vegetation shall be established, and no disturbance shall be allowed within the buffer until a qualified biologist determines that monarch butterflies are no longer occupying the vegetation. If no overwintering monarch butterflies are on the project site, grubbing, trimming, or clearing shall proceed. **(Implements PEIR MM-BIO-1).**

Rezone Site 1 MM-BIO-5: Standard Construction Best Management Practices. Standard construction best management practices shall be implemented to avoid potential indirect impacts on sensitive biological resources. These best management practices shall include but are not limited to the following.

- Dust suppression measures
- Trash containment
- Use of weed-free erosion control products during all phases of construction. **(Implements PEIR MM-BIO-1).**

Rezone Site 1 MM-BIO-6: Storm Water Pollution Prevention Plan. Prior to notice to proceed with any construction, including clearing, grubbing, and/or grading, a Stormwater Pollution Prevention Plan shall be prepared, pursuant to National Pollution Discharge Elimination System General Construction Permit (Water Quality Order 99-08-DWQ). The Stormwater Pollution Prevention Plan shall address the potential sources and locations of stormwater contamination, characteristics and impacts of specific contaminants, and temporary and permanent erosion-control practices and shall include water sampling data, construction practices that minimize stormwater contamination, coordination of best management practices with planned construction activities, and compliance with local, state, and federal regulations. The Stormwater Pollution Prevention Plan shall include best management practices that shall be clearly stated on project plans and design documents. The implementation of the Stormwater Pollution Prevention Plan shall protect adjacent aquatic resources, habitats, and sensitive species during construction to the maximum extent practicable with the goal of providing multiple beneficial uses. Post-construction, the project shall incorporate water quality protection design standards that will reduce, capture, and treat runoff from the project site, with an emphasis on protecting the adjacent aquatic resources. overwintering monarch butterflies are on the project site, grubbing, trimming, or clearing shall proceed. **(Implements PEIR MM-BIO-1).**

As required by PEIR MM-BIO-1, the following site-specific mitigation measures are required: **Rezone Site 1 MM-BIO-1** through **Rezone Site 1 MM-BIO-6**, which reduce impacts to a less than significant level.

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

Previously Approved Project Impact – Less Than Significant with Mitigation Incorporated

The PEIR determined that while the Approved Project does not specifically propose vegetation removal, future development of the Rezone Sites could have the potential to directly impact sensitive vegetation communities through such activities. Sensitive vegetation communities which exist or have the potential to exist at Rezone Sites include coastal sage scrub, non-native grasslands, and wetland/riparian. These communities are considered sensitive due to their limited occurrence and ability to support diverse and sensitive species, and the following Mitigation Measures were required:

PEIR MM-BIO-1: See above.

PEIR MM-BIO-5: Prior to issuance of any grading or removal of sensitive vegetation communities, the applicant shall provide evidence to the City that replacement habitats have been preserved in accordance with the mitigation ratios in the 2018 Draft Santee Subarea Plan. The required acreages and types of replacement habitat shall be included as a note on the grading plans and the City shall require evidence of satisfaction prior to grading. Replacement habitats may be in the form of a dedicated easement, proof of purchase of mitigation credits, or other method of conservation. The applicant shall additionally implement all feasible avoidance and minimization measures to protect habitats remaining on-site.

With the implementation of **PEIR MM-BIO-1** and **PEIR MM-BIO-5**, impacts would be less than significant.

Proposed Project Impact – Less Than Significant with Mitigation Incorporated

Direct temporary and permanent impacts to sensitive vegetation communities on Rezone Site 1 are not anticipated, as these habitats will be avoided during Project implementation; therefore, no mitigation is required with respect to direct impacts.

Indirect impacts on sensitive vegetation communities on Rezone Site 1 could result from the invasion and spread of exotic species, exposure to construction-related pollutant discharges, and trampling by humans. These temporary construction-related indirect impacts to sensitive vegetation communities would be significant, and the following Mitigation Measures were required:

Rezone Site 1-MM-BIO-5: Standard Construction Best Management Practices. See above.

Rezone Site 1 MM-BIO 6: Storm Water Pollution Prevention Plan. See above.

There are no new or more severe impacts that were not previously evaluated in the PEIR.

c) Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Previously Approved Project Impact – Less Than Significant with Mitigation Incorporated

While the Previously Approved Project did not specifically propose alteration of a known or potential jurisdictional water or wetland, future development of the Rezone Sites has the potential to directly or indirectly impact jurisdictional waters or wetlands by vegetation removal and/or grading activities associated with development. Therefore, **(PEIR) MM-BIO-6** was required.

PEIR MM-BIO-6: Applications where the City has determined a potential for impacts to jurisdictional waters and wetlands, shall be required to comply with the following mitigation framework. Prior to issuance of any construction permit or any earth-moving activities, a site-specific general biological resources survey shall be conducted to identify the presence of any sensitive biological resources, including any wetlands. If any potential jurisdictional waters or wetlands are identified on-site during the general biological resources survey, then

a jurisdictional wetlands delineation shall be conducted following the methods outlined in the USACE's 1987 Wetlands Delineation Manual and the Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region. The limits of any wetland habitats on-site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites that may not meet federal jurisdictional criteria but are regulated by the RWQCB.

Avoidance measures based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to jurisdictional waters consistent with federal, state, and City guidelines. Unavoidable impacts to wetlands shall be minimized to the maximum extent practicable and would be subject to alternatives and mitigation analyses consistent with U.S. Environmental Protection Agency 404(b)(1) findings and procedures under the USACE's permit process. Unavoidable impacts would require the in-kind creation of a new wetland of the same type lost, at a ratio determined by the applicable regulatory agencies that would prevent any net loss of wetland functions and values. Wetland creation on-site or within the same wetland system shall be given preference over replacement off-site or within a different system. The City shall also control the use and development in surrounding areas of influence wetlands with the application of buffer zones. Buffer widths shall be 50 to 200 feet from the edge of the wetland/riparian habitat unless the applicant demonstrates that a buffer of lesser width would protect the resources of the wetland based on site-specific information related to construction and operation. Use and development within buffer areas shall be limited to minor passive recreational uses with fencing, desiltation, or erosion control facilities, or other improvements deemed necessary to protect the habitat, to be located in the upper (upland) half of the buffer when feasible wetlands and buffers shall be permanently conserved or protected through the application of an open space easement or other suitable devices.

Additional requirements apply for development along the San Diego River to implement Draft Subarea Plan Section 5.3.4. Specifically, wherever development is proposed in or adjacent to riparian habitats along the main stem San Diego River, the riparian area and other wetlands or associated natural habitats locate a segment to ensure their protection in perpetuity. In addition, a minimum 100-foot biological buffer shall be established for upland habitats, beginning at the outer edge of riparian vegetation. Within the 100-foot biological buffer, no new development shall be allowed, and the area shall be managed for natural biological values as part of the preserve system. If natural habitats do not cover the 100-foot buffer area at the time of the proposed action, habitats appropriate to the location and soils shall be restored as a condition for the proposed action. In most cases, coastal sage scrub vegetation shall be the preferred habitat to restore within the biological buffer.

*Note: The last paragraph of **PEIR MM-BIO-6** does not apply to the Project, as it is specific to Rezone Sites adjacent to the San Diego River, and Rezone Site 1 is not adjacent to the river.*

*With the implementation of **PEIR MM-BIO-6**, impacts would be less than significant.*

Proposed Project Impact – Less than Significant with Mitigation Incorporated

Direct Impacts

The potential jurisdictional aquatic features observed on Rezone Site 1 total approximately 0.03 acre, with approximately 0.01 acre occurring on the site; however, these features will be avoided entirely during the implementation of the Proposed Project.

Indirect Impacts

Most of the indirect impacts on potential jurisdictional aquatic resources can result from the generation of fugitive dust, changes in hydrology resulting from construction (including sedimentation and erosion), and exposure to construction-related pollutant discharges. Implementation of Mitigation Measure **PEIR MM-BIO-1** would require delineation of the work area to avoid impacts to sensitive aquatic resources within and outside the Project site and the presence of a monitor for all work conducted within 100 feet of aquatic resources on the Project site. Implementation of **Rezone Site 1-MM-BIO-5** and **Rezone Site 1-MM-BIO-6** would prevent potential indirect impacts to sensitive vegetation communities through the use of standard construction best management practices and the implementation of a Stormwater Pollution Prevention Plan.

As presented in the Harris 2023 Biological Resources Letter Report, (**Appendix C**) Level of Significance after Mitigation Section, implementation of Mitigation Measures **Rezone Site 1-MM BIO-1** through **Rezone Site 1- MM-BIO-5** would reduce impacts to the six sensitive wildlife species determined to have a high potential to occur in the survey area to less than significant. Specific mitigation measures have also been provided for coastal California gnatcatcher (MM-BIO-2), nesting birds (MM-BIO-3), and monarch butterfly (MM-BIO-4). Impacts to the sensitive species without species-specific mitigation measures, Crotch's bumblebee, red diamond rattlesnake, Belding's orange-throated whiptail, and Blainville's horned lizard, would be mitigated through implementation of MM-BIO-1, MM-BIO-5, and MM-BIO-6.

There are no new or more severe impacts that were not previously evaluated in the EIR.

d) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Previously Approved Project Impact – Less than Significant with Mitigation Incorporated

The Rezone Sites are primarily restricted by developed land. Although Rezone Sites 10, 16A, 16B, 18, and 35 are bounded, in part, by undeveloped land, they do not meet the criteria for a wildlife movement corridor, as they are restricted by roads and other developments. Additionally, they are not identified as a wildlife movement corridor in the Draft Santee Subarea Plan.

A portion of Rezone Sites 17 and 18 contain areas associated with the San Diego River and its tributaries. While the Draft Santee Subarea Plan identifies the San Diego River as a regionally significant wildlife movement corridor; the Subarea Plan anticipated the development of Rezone Sites 17 and 18 (refer to Subarea Plan Figure 5-1, Subarea Plan Preserve Santee MSCP Subarea Plan) and shows those sites as being located outside the Preserve. Retention of the river corridor

outside these sites would be consistent with the Subarea Plan assumptions for wildlife movement. Furthermore, any potential impacts to wetland and riparian habitats within Rezone Sites 17 and 18 would be required to comply with state and federal requirements for wetland avoidance and implementation of **PEIR MM-BIO-6**, which ensures wetland resources are avoided and mitigated and adequate buffers are retained adjacent to the San Diego River.

Proposed Project Impact – Less than Significant Impact

The Project site likely functions mainly as a local movement corridor for sensitive and common wildlife species rather than a larger-scale route for migratory animals because of the presence of Diegan coastal sage scrub and non-vegetated channels within the survey area and Project site, and their proximity to large, continuous stretches of high-quality Diegan coastal sage scrub to the north, east, and west.

However, the high-quality Diegan coastal sage scrub present on the Project site provides live-in and breeding habitat for some sensitive wildlife species, including Belding's orange-throated whiptail, Blainville's horned lizard, coastal California gnatcatcher, Crotch's bumblebee, monarch butterfly, and red diamond rattlesnake. However, the Project avoids disturbance to the Diegan coastal scrub, and no impacts are anticipated to this vegetation community as a result of Project implementation. Non-native woodland has the potential to support nesting, roosting, and foraging habitat primarily for avian and common bat species. However, the majority of trees within the non-native woodland habitat will not be removed and will continue to provide suitable habitat for these species. Project implementation is likely to temporarily impede local movement of wildlife species; however, it is unlikely to inhibit regional or major movement of wildlife species within the area, and no mitigation is required. There are no new or more severe impacts that were not previously evaluated in the EIR.

e) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Previously Approved Project Impact – Less than Significant

Future development, discretionary or by-right, would not conflict with the City's adopted regulations about trees or natural water courses. All future projects within the Rezone Sites would be required to adhere to these policies and regulations.

Proposed Project Impact – Less than Significant

The Proposed Project would comply with the local policies or ordinances protecting biological resources identified in Santee's General Plan, Draft Santee Subarea Plan, and the Multiple Species Conservation Plan (MSCP) (County of San Diego 1998). Therefore, no impacts to local policies or ordinances would occur from the implementation of the Project, and no mitigation is required. There are no new or more severe impacts that were not previously evaluated in the EIR.

f) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Previously Approved Project Impact – Less than Significant

The PEIR determined that the Project would not conflict with an adopted HCP, NCCP, or any other approved local, regional, or state HCP. As noted above, the Rezone Sites are located within the planning area for the Draft Santee Subarea Plan, which has not been adopted. Implementation of **PEIR MM-BIO-1** through **PEIR MM-BIO-8** would ensure that future development within the Rezone Sites is consistent with the Draft Santee Subarea Plan by requiring site-specific surveys to be conducted for future project-level review to verify the presence of sensitive biological resources occurring on individual sites, determine the extent of any potential impacts, and provide mitigation to reduce the impacts to below a level of significance. All future projects (discretionary and by-right) would be required to address sensitive species and vegetation communities identified in the Draft Santee Subarea Plan.

Proposed Project Impact – No Impact

The Santee MSCP Subarea Plan has not been approved; however, Rezone Site 1 is not within the Santee Preserve or Open Space System. Therefore, no impacts to local conservation plans would occur from the implementation of the Project. There are no new or more severe impacts that were not previously evaluated in the EIR.

2. Findings

Section 15183

As demonstrated in the analysis above, impacts relating to Biological Resources would be less than significant with the implementation of **Rezone Site 1 MM-BIO-1** through **Rezone Site 1 MM-BIO-6**, which implement and are required pursuant to PEIR MM BIO-1. Therefore, the following findings can be made.

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required.

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.4 Cultural Resources

This section corresponds with the Previous Approved PEIR Section 4.4, *Cultural Resources*.

1. Section 15164 Analysis

a) **Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?**

Previously Approved Project Impact – Less than Significant with Mitigation Incorporated

The PEIR determined that while the Previously Approved Project does not specifically propose alteration of a known historic resource, the Rezone Sites have the potential to contain buildings or structures that may be 50 years of age or older at the time of future development and, therefore, may need to be evaluated for historical significance. Direct impacts to historical resources could potentially result from the physical demolition, destruction, relocation, or alteration of these structures within the Project areas. Policies 8.1 and 12.1 of the City General Plan (2003) are aimed at the protection of historic buildings. As future projects are planned, they must adhere to these policies and regulations through the application of requirements for development review. However, because site-specific details of specific projects are not known at this program-level of analysis, including project footprints, project designs, and timelines for development, impacts to historic resources would be considered potentially significant. Therefore, the following Mitigation Measure was required in the PEIR for the Approved Project.

PEIR MM-CUL-1: *Applications for future development of project areas, wherein the City Planning & Building Director has determined the potential for impacts to historical resources, shall be required to comply with the following mitigation framework:*

- a) *Prior to the issuance of any permit for a future development project, the age and original structural integrity and context of any buildings/structures occurring in the project areas shall be verified. A staff-level evaluation is required in conjunction with the development permit application to verify the age and original structural integrity of all on-site structures.*
- b) *For any building/structure in excess of 50 years of age having its original structural integrity intact, a qualified professional historian may be required to determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in CEQA Guidelines Section 15064.5. A historical resource report shall be prepared by a Secretary of Interior's Standard Historic Architect or Architectural Historian and submitted by the project applicant to the City and shall include the methods used to determine the presence or absence of historical resources, identify potential impacts from the proposed project, evaluate the significance of any historical resources, and identify mitigation measures.*
- c) *Future development at Rezone Site 20 shall be required to obtain the services of the Secretary of Interior's Standard Historic Architect or Registered Architectural Historian to*

submit a report to the City demonstrating how development adjacent to the Polo Barn would adhere to the Secretary of Interior Standards for the Treatment of Historic Properties and standards and guidelines prescribed by the State Office of Historic Preservation to ensure indirect impacts are avoided. Development on Site 20 is not subject to items (a) and (b) above as the Polo Barn is already known to be a significant historical site.

Note: Section c) of PEIR MM-CUL-1 does not apply to the Project, as it is specific to Rezone Site 20 and the proposed Project is located on Rezone Site 1

Proposed Project Impact – Less than Significant

In fulfillment of **PEIR MM-CUL-1**, CRM TECH initiated a historical/archaeological resources records search and a Native American Sacred Lands File search, pursued historical background research, and carried out an intensive-level field survey (Appendix D). As a result of these research procedures, a group of existing buildings on the property, originally constructed in 1974, were recorded into the California Historical Resources Inventory under the temporary designation of Site 4070-1H, pending the assignment of a permanent identification number. The buildings include a single-family residence, a converted garage, and a studio. The study has identified no persons or events of recognized historic significance in association with the property, nor does any of the buildings exhibit the potential to yield any important historical data or any special merit in design, construction, or aesthetics. As such, Site 4070-1H does not appear eligible for listing in the California Register of Historical Resources and does not meet CEQA's definition of a "historical resource." No additional cultural resources investigations will be necessary. There are no new or more severe impacts that were not previously evaluated in the EIR.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Previously Approved Project Impact – Less than Significant with Mitigation Incorporated

The PEIR found that while the Previously Approved Project did not specifically propose alteration of the known archaeological resource or ground-disturbing activities such as grading or excavation, future development within Rezone Site 1 would have the potential to directly or indirectly impact undiscovered subsurface archaeological resources that have not been evaluated. Policies 8-1 and 8.2 of the City General Plan (2003) are aimed at the protection of prehistoric sites.

As future projects are planned, they would be required to adhere to these policies and regulations through a discretionary review or a ministerial development review process. Additionally, for certain environmental documents, AB 52 requires early consultation with culturally affiliated tribes in the area that request consultation. However, because site-specific details are not known at this program-level of analysis, potential impacts on archaeological resources or tribal cultural resources would be significant. Therefore, the following mitigation measures were required in the PEIR for the Previously Approved Project.

PEIR MM-CUL-2: Applications for future development, wherein the City Planning & Building Director has determined a potential for impacts to subsurface archaeological resources, shall be required to comply with the following mitigation framework:

Prior to the issuance of any permit for future development consistent with the project, and if the project has not been surveyed within the last five years, an archaeological survey shall be conducted by a qualified archaeologist to evaluate the presence of archaeological resources and the need for project impact mitigation by preservation, relocation, or other methods. The archaeological survey shall include a records search at the South Coastal Information Center branch of the California Historical Research Information System, to determine if previously recorded prehistoric or historic archaeological resources exist on the housing site. In addition, the Native American Heritage Commission should be contacted to perform a Sacred Lands File Search. An archaeological resource report detailing the results of the record search, Sacred Lands Search, and the field survey of the project area shall be submitted by the project applicant to the City. The report shall include the methods used to determine the presence or absence of archaeological resources, identify potential impacts from the proposed project, and evaluate the significance of any archaeological resources identified. If potentially significant impacts to an identified archaeological resource are identified, the report shall also recommend appropriate mitigation to reduce the impacts to below a level of significance, which could include avoidance as the preferred method, a data recovery program, and/or construction monitoring. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure. Reports shall be submitted to the South Coastal Information Center upon finalization.

PEIR MM-CUL-3: Applications for future development wherein the City Planning & Building Director or a site-specific report has determined the potential for discovery of buried archaeological resources shall be required to comply with the following mitigation framework for archaeological and Native American construction monitoring:

Prior to the issuance of a grading permit, the City's Project Planner must verify that the requirements for archaeological and Native American construction monitoring have been noted on the construction documents.

The applicant must provide written verification to the City Project Planner stating that a Secretary of Interior's Standards qualified archaeologist and Native American monitor have been retained by the owner/applicant to implement construction monitoring.

The qualified archaeologist and Native American monitor shall be invited to attend the pre-construction meeting with the contractor and any subcontractors to describe the goal of construction monitoring.

Archaeological and Native American monitors shall be present during ground-disturbing activities (grubbing, demolition of foundations, grading, trenching) that have the potential to unearth unknown subsurface archaeological deposits or Tribal cultural resources. If archaeological or Tribal cultural resources are discovered, both monitors may

halt or divert ground-disturbing activities within 50 feet to allow for a determination of the resource's potential significance. The qualified archaeologist shall notify the City Project Planner of the discovery. Isolates and nonsignificant deposits shall be minimally documented in the field. Significant archaeological discoveries include intact features, stratified deposits, previously unknown archaeological sites, and human remains.

If a significant discovery is made, the qualified archaeologist shall prepare a data recovery plan in consultation with the Native American monitor to submit for approval by the City Project Planner. The plan shall be implemented using professional archaeological methods. Construction ground-disturbing activities, including grubbing, grading, and trenching, would be allowed to resume after the completion of the recovery of an adequate sample and recordation of the discovery.

All cultural material collected during the monitoring and data recovery program shall be processed and curated at a San Diego facility that meets federal standards per 36 CFR Part 79 unless the tribal monitors request the collection. If human remains are discovered, work shall halt in that area and the procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) will be followed. The qualified archaeologist shall contact the County Coroner.

After the completion of the monitoring, an appropriate report shall be prepared by the project archaeologist. If no significant cultural resources are discovered, a brief letter to the City Project Planner and South Coastal Information Center shall be prepared by the project archaeologist. If significant cultural resources are discovered, a report with the results of the monitoring and data recovery (including the interpretation of the data within the research context) shall be prepared by the project archaeologist, reviewed by a Native American representative, and submitted to the City Project Planner and South Coastal information Center.

Proposed Project Impact – Less Than Significant Impact with Mitigation Incorporated

Although more than 30 prehistoric (i.e., Native American) archaeological sites and isolates (i.e., localities with fewer than three artifacts) have been recorded within a 1-mile radius of the Project area, all of those localities were found on undisturbed hillsides in the surrounding area, a typical pattern for prehistoric cultural resources in southern California. In other words, known prehistoric cultural remains nearby generally occur in a different geographic setting from that of the project location. The only potential historical resource identified in the Project area is the single-family residence located on the Proposed Project site. However, there have been no persons or events of recognized historical significance associated with the property, and the style of the building does not embody the work of a prominent architect or builder. Additionally, the building does not demonstrate the potential to yield important data to further the study of 1970s history. Therefore, **PEIR MM-CUL-2** and **PEIR MM-CUL-3** above shall apply to the Proposed Project. There are no new or more severe impacts that were not previously evaluated in the PEIR.

c) Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

Previously Approved Project Impact – Less than Significant

The PEIR found that no known burial sites or cemeteries occur within the vicinity of the Rezone Sites. Therefore, it is not expected that human remains would be disturbed as a result of the construction of these areas. In the unlikely event that human remains are discovered, the provisions outlined in California Public Resources Code §5097.98 and California Health and Safety Code §7050.5 would be implemented in consultation with the assigned Most Likely Descendant as identified by the Native American Heritage Commission (NAHC). No further construction activities would be permitted until the coroner is contacted, as well as any applicable Native American tribes. The City shall be required to comply with the California Native American Graves Protection and Repatriation Act (2001), the federal Native American Graves Protection and Repatriation Act (1990), SB 18, and AB 52 early consultation requirements.

Proposed Project Impact – Less Than Significant

Rezone Site 1 is currently developed with a single-family residence, a converted garage, and a studio. No known burial sites or a formal cemetery are located within the boundaries of the site. California Public Resources Code (PRC) §5097.98 outlines the procedures to be followed in the event of the discovery of human remains. All development is required to follow PRC §5097.98. There are no new or more severe impacts that were not previously evaluated in the PEIR.

2. Findings

Section 15183

As demonstrated in the analysis above, impacts relating to Cultural Resources would be less than significant with the implementation of **PEIR MM-CUL-2** and **PEIR MM-CUL-3**, which require monitoring during ground disturbing activities and in the event of discovery of sub-surface cultural or tribal cultural resources, evaluation and treatment as necessary. Therefore, the following findings can be made.

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.5 Energy

This section corresponds with the Previous Approved PEIR Section 8.2 *Energy*.

1. Section 15164 Analysis

a) Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Previously Approved Project Impact – Less than Significant

The PEIR determined that energy-related impacts would not be significant for the following reasons:

Construction

Construction grading and construction activities consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. At the program level, it is too speculative to quantify total construction-related energy consumption of future development, either in total or by fuel type. Energy used during future construction of the Project areas is not considered significant given typical energy use associated with the type of development proposed and the short-term nature of the energy consumption. There are no conditions in the project areas that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates.

Consistent with state requirements, all construction equipment would meet California Air Resources Board (CARB) Tier 3 In-Use Off-Road Diesel Engine Standards. Engines are required to meet certain emissions standards, and groups of standards are referred to as Tiers. A Tier 0 engine is unregulated with no emissions controls, and each progression of standard level (e.g., Tier 1, Tier 2, Tier 3) generates lower emissions, uses less energy, and is more advanced technologically than the previous tier. CARB's Tier 3 In-Use Off-Road Diesel Engine Standards require that construction equipment fleets become cleaner and use less energy over time.

Long Term Operations

Long-term operational energy use associated with the buildout of residential housing at the Rezone Sites includes fuel consumption of vehicles, electricity and natural gas consumption by residents and commercial operations, and energy consumption related to obtaining water. However, anticipated housing will be multifamily housing, which is a more efficient way to provide housing than lower-density single-family development. Although the Project would provide capacity for future housing development that could increase energy use, the energy demand of future residential development would be consistent with the energy demand for multifamily housing within other cities in the region and would not be associated with inefficient or wasteful energy use. Implementation of the Project would not result in any unusual characteristics that would result in excessive long-term operational building energy demand.

Future development associated with the implementation of residential development at the Rezone Sites would be subject to compliance with the California Building Code (Title 24), which

aims to reduce excessive and inefficient energy use. The California Building Code is regularly updated and includes higher energy-efficiency standards in comparison to other states. Individual development projects in the City would be required to comply with applicable federal, state, and local energy and building regulations, including the requirements of the Sustainable Santee Plan.

Transportation

Buildout of the Rezone Sites would consume energy-associated transportation uses. Trips by individuals traveling to, from, and within the Project area would largely rely on passenger vehicles or public transit. Passenger vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. Public transit would be powered by diesel or natural gas and could potentially be fueled by electricity. According to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing vehicle standards and revising existing standards. Compliance with federal fuel economy standards is not determined for each vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Over time, fuel economy standards have increased and reduced the greenhouse gas emissions footprint of vehicles.

As discussed in Section 4.13, of the EIR, the Project would result in a reduction in vehicle miles traveled (VMT) per capita, which would move the City in the direction of reducing VMT citywide, although a significant VMT impact would still result because VMT per capita would be greater than 85 percent of the regional average. The higher VMT per capita in Santee compared to the County of San Diego is representative of major job centers being located in other areas of the county and Santee residents relying heavily on commutes to job centers in other cities. Although the City has a less efficient VMT per capita when compared to the region, this does not indicate that the Project would result in wasteful or inefficient use of transportation-related energy, since the growth is planned and needed to meet the City's Regional Housing Needs Allocation (RHNA) obligations. By locating housing at existing retail sites and developing retail uses along with multifamily residential uses at the Rezone Sites, non-commute vehicle trips may be reduced. The City shall ensure that future projects are compliant with Mobility Element Policies 9.1 through 9.5, which encourage the use of Transportation Demand Management (TDM) strategies, such as ride-sharing programs, flexible work schedule programs, and incentives for employees to use transit. Future projects would be required to comply with the Sustainable Santee Plan by promoting non-motorized transportation options, improving bicycle transit, installing electric vehicle charging stations, and improving traffic flow. This would be demonstrated through the completion of the Sustainable Santee Plan Consistency Checklist. Additionally, alternative transportation modes, such as walking, cycling, and public transit are encouraged to reduce peak-hour vehicular trips, save energy, and improve air quality.

Electricity and Natural Gas

Non-transportation energy use would be associated with electricity and natural gas. The Renewables Portfolio Standard (RPS) promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Originally adopted in 2002 to achieve a 20 percent renewable energy mix by 2020 (referred to as

the “Initial RPS”), the goal has been accelerated and increased by Executive Orders S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, Senate Bill (SB) 2 (1X) codified California's 33 percent Renewable Portfolio Standard (RPS) goal. SB 350 (2015) increased California's renewable energy mix goal to 50 percent by the year 2030. SB 100 (2018) further increased the standard set by SB 350 establishing the RPS goal of 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent by 2030.

The City is served by San Diego Gas & Electric (SDG&E). Based on the most recent annual report, SDG&E has already procured 44 percent (California Public Utilities Commission [CPUC] 2019) renewable energy and is on track to procure 60 percent by 2030 as outlined in SDG&E's 2019 RPS Procurement Plan. The California Code of Regulations, Title 24, is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. Of particular relevance to greenhouse gas emissions reductions are the CBC's energy efficiency and green building standards as outlined below.

Title 24, Part 11 of the California Code of Regulations is CALGreen. Beginning in 2011, CALGreen instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and low-rise residential buildings, state-owned buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory requirements and may adopt CALGreen with amendments for stricter requirements. Future development would, at a minimum, be required to comply with the mandatory measures included in the current 2019 Energy Code (California Code of Regulations, Title 24, Part 6) and the 2019 CALGreen standards. The mandatory standards require the following:

- Residential solar requirements;
- Outdoor water use requirements as outlined in local water efficient landscaping ordinances or current Model Water Efficient Landscape Ordinance standards, whichever is more stringent;
- Requirements for water-conserving plumbing fixtures and fittings;
- 65 percent of construction/demolition water is diverted from landfills;
- Low-pollutant-emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particle boards.

Similar to the compliance reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen operational water reduction requirements must be demonstrated through the completion of water use reporting forms for new low-rise residential and non-residential buildings. The water use compliance form must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate. The Project does not involve any unusual characteristics that would result in excessive long-term operational demand for electricity or natural gas. The applicable state plans that address renewable energy and energy efficiency are CALGreen, the California Energy Code, and RPS, and the applicable local plan is the General Plan. All future development projects would be required to meet the mandatory energy requirements of 2019 CALGreen and the 2019 California Energy Code, at a minimum.

Future projects would be required to comply with the Sustainable Santee Plan by increasing energy efficiency and installing solar photovoltaic systems. This would be demonstrated through the completion of the Sustainable Santee Plan Consistency Checklist. The Project would not conflict with or obstruct the implementation of CALGreen and the California Energy Code, or with SDG&E's implementation of RPS. Project adherence to state and federal regulations and the Sustainable Santee Plan goals will guide reductions in the City's collective long-term operational energy use.

Proposed Project Impact – Less than Significant

The analysis contained in the PEIR also applies to the Proposed Project. The Proposed Project would comply with applicable federal, state, and local energy and building regulations, including the requirements of the Sustainable Santee Plan (see Section 19.7, Greenhouse Gas Emissions, Table 8, Sustainable Santee Plan Consistency Checklist). There are no new or more severe impacts that were not previously evaluated in the EIR.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Previously Approved Project Impact – Less than Significant

As discussed in the EIR, the applicable state plans that address renewable energy and energy efficiency are CALGreen, the California Energy Code, and RPS, and the applicable local plan is the Sustainable Santee Plan. As discussed under Section 8.2., Energy, the Project would be required to meet the mandatory energy requirements of 2019 CALGreen and the 2019 California Energy Code. The Project would not conflict with or obstruct the implementation of CALGreen and the California Energy Code, or with SDG&E's implementation of RPS. Additionally, as detailed in Section 19.7, Greenhouse Gas Emissions, future development would be consistent with Sustainable Santee Plan Goals and Implementing Measures. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Proposed Project Impact – Less than Significant

The Proposed Project would comply with CALGreen, California Energy Code, RPS, and the Sustainable Santee Plan regulations. These regulations include but are not limited to the use of energy-efficient heating and cooling systems, water-conserving plumbing, and water-efficient irrigation systems. The Project is required to demonstrate compliance with these regulations as a part of the building permit and inspection process. There are no new or more severe impacts that were not previously evaluated in the EIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Energy would be less than significant through mandatory energy efficiency requirements contained in CALGreen, the California Energy Code, and the Sustainable Santee Plan t described above. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.

2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required.

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.6 Geology and Soils

This section corresponds with the Previous Approved PEIR Section 4.5, *Geology/Soils*.

1. Section 15164 Analysis

a) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**
-

Previously Approved Project Impact – Less than Significant

The City's General Plan Safety Element policies are implemented through Section 11.40.130 of the City's Municipal Code, which specifies that a preliminary soil engineering report must be submitted with the application for a grading permit. A preliminary geological investigation and report are required for all land development projects designated as Group I or Group II as defined in the Safety Element. In addition, conformance to building construction standards for seismic safety within the Uniform Building Code (UBC) would ensure that new structures would be able to withstand seismic events within the City. Therefore, adherence to General Plan Safety Element policies, the City's Municipal Code, and the UBC would ensure that future development within the Rezone Sites would not cause substantial adverse effects associated with fault rupture.

Proposed Project Impact – No Impact

Rezone Site 1 is not located within an Alquist-Priolo Fault Zone, and no known active faults are known in the area. A Geotechnical Evaluation was conducted by Petra Geosciences, Inc. (Appendix E), which concluded that the site is not located within a currently designated Alquist-Priolo Fault Zone and no known active faults have been identified on-site. The Project would adhere to the General Plan policies, the Municipal code, and the UBC. There are no new or more severe impacts that were not previously evaluated in the EIR.

-
- ii) Strong seismic ground shaking?**
-

Previously Approved Project Impact – Less than Significant

The Previously Approved Project would increase the allowable number of people and structures that could be exposed to ground shaking during a seismic event. However, future development, whether discretionary or by-right, would be required to comply with General Plan Safety Element policies and the City's Municipal Code requirements described in EIR Section 4.5.5.1.a. In addition, conformance to building construction standards for seismic safety within the UBC would ensure that new structures would be able to withstand seismic events within the City. Therefore, adherence to General Plan Safety Element policies, the City's Municipal Code, and the UBC would ensure that future development within the Rezone Sites would not cause substantial adverse effects associated with ground shaking, and impacts would be less than significant.

Proposed Project Impact – Less than Significant

Rezone Site 1 is located in a seismically active region and is likely to be subjected to strong seismic ground shaking during the life span of this Project. The geotechnical conditions were evaluated in the Geotechnical Evaluation prepared by Petra Geosciences, Inc. (Appendix E). As a condition of project approval, the Proposed Project would be required to adhere to the geotechnical recommendations included in the evaluation. There are no new or more severe impacts that were not previously evaluated in the EIR.

iii) Seismic-related ground failure, including liquefaction?

Previously Approved Project Impact – Less than Significant

All future development, whether discretionary or by-right, would be required to comply with the General Plan Safety Element policies and the City's Municipal Code requirements described in Section 4.5.5.1.a. of the EIR. In addition, conformance to building construction standards for seismic safety within the UBC would ensure that new structures would be able to withstand seismic events within the City. Therefore, adherence to Safety Element policies, the Municipal Code, and the UBC would ensure that future development within the Rezone Sites would not cause substantial adverse effects associated with liquefaction or landslide.

Proposed Project Impact – Less than Significant

The Geotechnical Evaluation (Appendix E) for the Proposed Project found this site is mapped as mostly within zones of nominal liquefaction potential based on the property being underlain by granitic bedrock, with the western portion of the site having low to moderate liquefaction potential due to the presence of older alluvium. The Geotechnical Study concluded that the site should be considered as having nominal liquefaction potential due to the lack of groundwater and granitic bedrock based on boring logs. The Project would adhere to the General Plan policies, the Municipal Code, the UBC, and the geotechnical recommendations included in the Project's Geotechnical Evaluation. There are no new or more severe impacts that were not previously evaluated in the EIR.

iv) Landslides?

Previously Approved Project Impact – Less than Significant

All future development, whether discretionary or by-right, would be required to comply with the General Plan Safety Element policies and the City's Municipal Code requirements described in EIR Section 4.5.5.1.a. In addition, conformance to building construction standards for seismic safety within the UBC would ensure that new structures would be able to withstand seismic events within the City. Therefore, adherence to Safety Element policies, the Municipal Code, and the UBC would ensure that future development within the Rezone Sites would not cause substantial adverse effects associated with liquefaction or landslide.

Proposed Project Impact – Less than Significant

According to the Project's Geotechnical Evaluation (Appendix E), the site and immediate area exhibit level topography with no existing slopes within or immediately adjacent to Rezone Site 1. The closest slope is located approximately 200 feet to the northeast and is a natural slope.

Additionally, the Geotechnical Evaluation found no landslides or rockfalls have been mapped within or in proximity to the site (Appendix D to Appendix E of this Checklist). The Project would adhere to the General Plan policies, the Municipal Code, the UBC, and the geotechnical recommendations included in the Project's Geotechnical Evaluation. There are no new or more severe impacts that were not evaluated in the previous Final PEIR.

b) Would the Project result in substantial soil erosion or the loss of topsoil?

Previously Approved Project Impact – Less than Significant

Measures implemented to avoid or reduce erosion and sedimentation effects are discussed in Section 4.8, Hydrology and Water Quality, of the EIR for the Previously Approved Project. Short-term erosion and sedimentation impacts would be addressed through conformance with the National Pollutant Discharge Elimination System (NPDES) and associated Municipal Code requirements (Title 9, Chapter 9.06 Stormwater Management and Discharge Control). These regulations require erosion and sedimentation control during construction and implementation of best management practices to avoid erosion and off-site drainage. Therefore, adherence to applicable Municipal Code requirements would ensure that future development would not result in substantial soil erosion or the loss of topsoil.

Proposed Project Impact – Less than Significant

Rezone Site 1 is developed as a single-family residence. The Proposed Project is required to adhere to the measures to reduce erosion provided in the previous EIR through conformance with NPDES and Municipal Code 9.06, which prohibit storm water discharge into the storm water system and reduce discharge of pollutants into the storm water system. The Geotechnical Evaluation (Appendix E) also discusses erosion control measures both temporary and permanent that are required by the Project. Permanent engineered slopes should be landscaped as soon as practical after grading. Landscaping would consist of a deep-rooted, drought-tolerant, and maintenance-free plant species. If landscaping cannot be provided within a reasonable time, jute matting (or equivalent) or a spray-on product designed to seal slope surfaces should be considered as a temporary measure to inhibit surface erosion until such time permanent landscape plants have become well-established. There are no new or more severe impacts that were not previously evaluated in the PEIR.

c) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Previously Approved Project Impact – Less than Significant

The City's General Plan Safety Element policies are implemented through Section 11.40.130 of the City's Municipal Code, which specifies that a preliminary soil engineering report must be submitted with the application for a grading permit. A preliminary geological investigation and report are required for all land development projects designated as Group I or Group II as defined in the Safety Element. In addition, conformance to building construction standards for seismic safety within the Uniform Building Code (UBC) would ensure that new structures would be able to withstand seismic events within the City. Therefore, adherence to General Plan Safety Element

policies, the City's Municipal Code, and the UBC would ensure that future development within the Rezone Sites would not cause substantial adverse effects associated with fault rupture, and impacts would be less than significant.

The Previously Approved Project would increase the allowable number of people and structures that could be exposed to ground shaking during a seismic event. However, future development, whether discretionary or by-right, would be required to comply with General Plan Safety Element policies and the City's Municipal Code requirements. In addition, conformance to building construction standards for seismic safety within the UBC would ensure that new structures would be able to withstand seismic events within the City. Therefore, adherence to General Plan Safety Element policies, the City's Municipal Code, the UBC, and the geotechnical recommendations included in the Project's Geotechnical Evaluation would ensure that future development within the Rezone Sites would not cause substantial adverse effects associated with ground shaking.

All future development, whether discretionary or by-right, would be required to comply with the General Plan Safety Element policies and the City's Municipal Code requirements described in Section 4.5.5.1.a of the PEIR.

Proposed Project Impact – Less than Significant

According to the Project's Geotechnical Evaluation (Appendix E), Rezone Site 1 is located in an area that is unlikely to experience subsidence, liquefaction, or seismically induced settlement. The Project would adhere to the General Plan policies, the Municipal Code, the UBC, and the geotechnical recommendations included in the Project's Geotechnical Evaluation. There are no new or more severe impacts that were not previously evaluated in the PEIR.

d) Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Previously Approved Project Impact – Less than Significant

Future development, whether discretionary or by-right, within the Rezone Sites, would be required to adhere to Municipal Code requirements for project-specific geotechnical reports that would ensure site-specific measures are implemented to ensure safe building construction in areas with expansive soils. These reports would guide the inclusion of proper site planning, design, and construction measures to avoid unfavorable conditions. Adherence to Municipal Code requirements would ensure that future development would not create substantial direct or indirect risks associated with expansive soils.

Proposed Project Impact – Less than Significant

The Geotechnical Evaluation (Appendix E) for the Proposed Project found as a result of laboratory testing that the site near surface soils is classified as "expansive" as defined in Section 1803.5.3 of the 2022 California Building Code (2022, CBC). The design of foundations and slabs on-ground should therefore be performed following the procedures outlined in Sections 1808.6.1 and 1808.6.2 of the 2022 CBC as well as the geotechnical recommendations included in the Project's Geotechnical Evaluation. There are no new or more severe impacts that were not previously evaluated in the PEIR.

e) Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Previously Approved Project Impact – No Impact

Due to the urban and built-out nature of the Rezone Sites, there is no expectation that septic tanks or alternative wastewater disposal systems would be part of any future development proposal.

Proposed Project Impact – No Impact

The Proposed Project would connect to the municipal wastewater system and would not require the use of septic systems. There are no new or more severe septic wastewater disposal impacts that were not previously evaluated in the PEIR. There are no new or more severe impacts that were not previously evaluated in the PEIR.

f) Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Previously Approved Project Impact – Less than Significant with Mitigation Incorporated

Grading into a geologic formation with high or moderate sensitivity has the potential to result in impacts on paleontological resources. At a program level of review, it is not possible to investigate each site to determine the depth of geologic formations and identify their associated paleontological sensitivity. For example, while the Rezone Sites are not located on formations with High Sensitivity (Friars and Mission Valley Formation), they could underlie formations with moderate sensitivity. If grading were to occur at depths sufficient to disturb moderate sensitivity geologic formations with potential paleontological resources, significant impacts could result. Potential impacts to paleontological resources would be significant therefore the following mitigation measure is included in the EIR for the Previously Approved Project:

PEIR MM-GEO-1: *To address potential impacts to paleontological resources, the City shall review the project application materials including the geotechnical report to determine if the project grading has the potential to disturb geologic formations with the potential to contain paleontological resources. If grading depths remain within the organic and soil layers, no monitoring would be required. The City may request information from the applicant such as the depth of grading, geologic formations, and paleontological sensitivity in order to determine the potential for impacts. In the event grading may disturb geologic formations with a moderate or high potential to contain paleontological resources, the following monitoring program shall be implemented prior to and during grading operations:*

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

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

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

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

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

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

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

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

Unique Geological Feature

The Rezone Sites are all located within the City either within existing developed sites or vacant sites with some history of disturbance. Unique geologic features have not been identified at any of the sites.

Proposed Project Impacts – Less than Significant with Mitigation Incorporated

The Proposed Project site is developed as a single-family residence. No unique geological features have been identified at any of the rezone sites within the City. The Project site is not located within a High Sensitivity area for paleontological resources. Due to the Late Pleistocene age alluvium, which is underlain by granitic bedrock, the paleontological resource sensitivity would be considered marginal to low. With the inclusion of **MM-GEO-1**, the impacts are less significant. There are no new or more severe impacts that were not previously evaluated in the PEIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Geology and Soils would be less than significant with the implementation of **PEIR MM-GEO-1**, which requires monitoring during ground

disturbing activities and in the event of discovery of sub-surface paleontological resources, evaluation and treatment as necessary. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required.

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.7 Greenhouse Gas Emissions

This section corresponds with the Previous Approved PEIR Section 4.6, *Greenhouse Gas Emissions*.

1. Section 15164 Analysis

- a) **Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**
 - b) **Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases?**
-

Previously Approved Project Impact – Significant and Unavoidable

The Previously Approved Project would result in an increase in GHG emissions that would exceed the assumption used in the development of the Sustainable Santee Plan and would result in an increase in VMT that exceeds the 85 percent threshold, resulting in a significant impact. Both ministerial and discretionary development implemented under the Project would be required to demonstrate compliance with the Sustainable Santee Plan through the completion of the Consistency Checklist. The Previously Approved Project would result in an increase in development and associated emissions not accounted for in the Sustainable Santee Plan; therefore, GHG emissions would not be adequately addressed through compliance with the Sustainable Santee Plan, and GHG emissions would be significant. Therefore, the following mitigation measures were required in the EIR for the Previously Approved Project.

PEIR MM-GHG-1: *For development at Rezone Sites that proceed before an update to the Sustainable Santee Plan is adopted, as detailed in **MM-GHG-2**, a site-specific GHG analysis is required. The site-specific GHG analysis shall (1) determine whether the project would result in GHG emissions that may have a significant impact on the environment and specifically must demonstrate how the project would reduce emissions to achieve consistency with the State Scoping Plan and applicable GHG reduction targets, and (2) the analysis must demonstrate how the project would be consistent with the Sustainable Santee Plan Consistency Checklist in addition to other applicable GHG reduction plans. The site-specific GHG analysis shall be completed to the satisfaction of the City during the permitting process.*

*For development at Rezone Sites that proceed after the Sustainable Santee Plan is adopted as detailed in **MM-GHG-2**, only project consistency with the Sustainable Santee Plan Consistency Checklist is required.*

MM-GHG-2: *Within 1 year of the adoption of the rezone program, the City shall prepare an update to the Sustainable Santee Plan to incorporate the additional emissions that would result from development at the rezone sites as part of the baseline inventory. The updated Sustainable Santee Plan shall determine GHG emission reduction targets consistent with the current Scoping Plan, based on the updated inventory, and provide any necessary updates to the Consistency Checklist.*

The EIR concluded that the effectiveness of GHG-reducing measures is context-sensitive and would vary depending on the site-specific project site, such as the location, access to transit, etc.

At a program level of review, it is not guaranteed that each individual project would fully mitigate the potential impacts. While the requirement for future development to demonstrate compliance with the Consistency Checklist in addition to implementation of **PEIR MM-GHG-1** and **MM-GHG-2** would minimize GHG impacts associated with future development at the Rezone Sites, at this program level of review, it is not feasible to conclude whether impacts would be fully mitigated. Therefore, impacts associated with GHG emissions would remain significant and unavoidable.

Proposed Project Impact – Less than Significant

As discussed above, **PEIR MM-GHG-1**, for development at Rezone Sites that proceed before an update to the Sustainable Santee Plan is adopted, a site-specific GHG analysis is required. The site-specific GHG analysis shall (1) determine whether the project would result in GHG emissions that may have a significant impact on the environment and specifically must demonstrate how the project would reduce emissions to achieve consistency with the State Scoping Plan and applicable GHG reduction targets, and (2) the analysis must demonstrate how the project would be consistent with the Sustainable Santee Plan Consistency Checklist. **PEIR MM-GHG-2** does not apply to the Proposed Project because the update to *the Santee Sustainable Plan is the responsibility of the City*.

Consistency with the State Scoping Plan

Per **PEIR MM-GHG-1** above, because the update to the Sustainable Santee Plan had not been adopted as of April 18, 2025, a site-specific GHG analysis was prepared (Appendix B) for Rezone Site 1 to determine consistency with the State Scoping Plan. A consistency analysis with the Sustainable Santee Plan has also been prepared for informational purposes only because it cannot be relied upon at this time, to determine significance for CEQA purposes. However, the analysis demonstrates that the Proposed Project implements the GHG reduction measures contained in the Plan.

CARB's 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 per AB 1279. The 2022 Scoping Plan focuses on zero-emissions transportation; phasing out the use of fossil gas use for heating homes and buildings; reducing chemicals and refrigerants with high Global Warming Potential (GWP); providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel-fired electrical generation through the use of renewable energy alternatives (e.g., solar arrays and wind turbines) and scaling up new options such as green hydrogen. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines § 15183.5. Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero-emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy ZEV buses and trucks. Additional transportation policies include the Off-Road Zero Emission Targeted Manufacturer Rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel Fueled Fleets Regulation, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation.

The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology. As indicated above, GHG reductions are also achieved as a result of the State of California's energy and water efficiency requirements for new residential development. These efficiency improvements correspond to reductions in secondary GHG emissions. For example, in California, most of the electricity that powers homes is derived from natural gas combustion. Therefore, energy-saving measures, such as Title 24, reduce GHG emissions from the power generation facilities by reducing load demand. The 2022 Scoping Plan Appendix D provides local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets outlined in the 2022 Scoping Plan. The 2022 Scoping Plan Appendix D focuses on Residential and Mixed-Use Projects. The 2022 Scoping Plan Appendix D lists potential actions that support the state's climate goals. However, the 2022 Scoping Plan notes that the applicability and performance of the actions may vary across the regions. The document is organized into two categories: (A) examples of plan-level GHG reduction actions that could be implemented by local governments, and (B) examples of on-site project design features and mitigation measures that could be required of individual projects under CEQA, if feasible when the local jurisdiction is the lead agency.

Table 7: Scoping Plan Consistency Summary

Action	Consistency
<p>Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.</p>	<p>No Conflict. The Project would use energy from San Diego Gas and Electric (SDG&E). SDG&E has committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SDG&E's energy source diversification efforts.</p>
<p>Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.</p> <p>Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.</p>	<p>No Conflict. The Project would be constructed in compliance with current CBC requirements including the 2022 Building and Energy Efficiency Standards and the 2021 California Green Building Standard requirements.</p>
<p>At least 1.5 million zero emission and plugin hybrid light-duty EVs by 2025.</p>	<p>No Conflict. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project must comply with the standards as applicable; and thus, would comply with the strategy.</p>

Action	Consistency
At least 4.2 million zero emission and plugin hybrid light-duty EVs by 2030.	No Conflict. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.	No Conflict. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.	No Conflict. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2.
Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.	No Conflict. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."	No Conflict. As stated in the Traffic Study, the Project's VMT impact would be considered less than significant.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	No Conflict. The project would not exceed the City's GHG emission thresholds for retail sources or otherwise conflict with GHG reduction efforts.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	No Conflict. The project would not conflict with use of adjacent streets by pedestrians or bicycles. Further, transit service provided by Metropolitan Transit System (MTS) would not be affected by the project.
Improve freight system efficiency.	No Conflict. This measure would apply to all trucks accessing the project site. It is presumed that these vehicles would primarily be delivery vans and tanker trucks operated as part of the statewide goods movement sector. Access to the Project site would be provided from Summit Avenue.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	No Conflict. When adopted, this measure would apply to all fuel sold on-site or purchased for use in vehicles accessing the project site. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.

Action	Consistency
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	No Conflict. The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere with agency efforts to reduce SLPS emissions.
Implement the post-2020 Cap- and-Trade Program with declining annual caps.	No Conflict. The Project would be required to comply with applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere with agency efforts to implement the post-2020 Cap-and-Trade Program.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.	No Conflict. To the extent appropriate for the proposed residences, wood products would be used in construction, including roof structure. Additionally, the Project includes landscaping.

As demonstrated in Table 7, Scoping Plan Consistency Summary, the Proposed Project would not conflict with the GHG reduction goals mandated by AB52.

Consistency with the Sustainable Santee Plan Consistency Checklist

The Sustainable Santee Plan Project Consistency Checklist (Checklist, Table 7) is intended to be a tool for development projects to demonstrate consistency with Santee's Sustainable Santee Plan, which is a qualified greenhouse gas (GHG) emissions reduction plan following California Environmental Quality Act (CEQA) Guidelines §15183.5. This Checklist has been developed as part of the Sustainable Santee Plan implementation and monitoring process and will support the achievement of individual GHG reduction measures as well as the City's overall GHG reduction goals. In addition, this Checklist will further the City's sustainability goals and policies that encourage sustainable development and aim to conserve and reduce the consumption of resources, such as energy and water, among others.

CEQA Guidelines §15183.5 allows lead agencies to analyze the impacts associated with GHG emissions at a programmatic level in plan-level documents such as Climate Action Plans or sustainability plans, so that project-level environmental documents may tier from the programmatic review. Projects that meet the requirements of this Checklist will be deemed to be consistent with the Sustainable Santee Plan and will be found to have a less than significant contribution to cumulative GHG (i.e., the project's incremental contribution to cumulative GHG effects is not cumulatively considerable), according to CEQA Guidelines §15064(h)(3), §15130(d), and §15183(b). Projects that do not meet the requirements in this Checklist will be deemed to be inconsistent with the Sustainable Santee Plan and must prepare a project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in this Checklist to the extent feasible. This GHG Checklist can be updated to reflect the adoption of new GHG reduction strategies or to comply with any changes and updates in the Plan or local, state, or federal regulations.

Table 8: Sustainable Santee Plan Consistency Checklist

Sustainable Santee Plan and Goals, and Implementing Measures	Project Consistency Analysis
<p>Goal 1: Increase Energy Efficiency in Existing Residential Units</p> <p>Measure 1.2: Existing Residential Unit Permit for Major Modifications (more than 30 percent of dwelling unit size, including bathroom and kitchen) that is considered a project under CEQA must implement energy efficiency retrofits recommended by City Energy Audit and explain the energy efficiency retrofits implemented.</p>	<p>N/A. The Proposed Project will demolish the existing residential structures on the Project site.</p>
<p>Goal 2: Increase Energy Efficiency in New Residential Units</p> <p>Measure 2.1: New residential construction meets or exceeds California Green Building Standards Tier 2 Voluntary Measures, such as obtaining green building ratings such as LEED, Build it Green, or Energy Star Certified building certifications in scoring development and explaining the measures implemented.</p>	<p>Consistent. The Proposed Project would comply with the California Green Building Standards Tier 2 Voluntary Measures such as adding PV solar panels to the entirety of the rooftop space, adding EV charging hookups to each of the 42 two-car garages, and constructing the buildings to be all-electric.</p>
<p>Goal 3: Increase Energy Efficiency in Existing Commercial Units</p> <p>Measure 3.2: For existing commercial units of 10,000 square feet or more seeking building permits for modifications representing 30 percent or more square feet and considered a project under CEQA must implement energy efficiency retrofits recommended by the City to meet California Green Building Standards Tier 1 Voluntary Measure and explain the retrofits implemented.</p>	<p>N/A. The Proposed Project does not include modifications to existing commercial units.</p>
<p>Goal 4: Increase Energy Efficiency in New Commercial Units</p> <p>Measure 4.1: New commercial units meet or exceed California Green Building Standards Tier 2 Voluntary Measures such as obtaining green building ratings including LEED, Build it Green, or Energy Star Certified building certifications in scoring development and explain the measures implemented.</p>	<p>N/A. The Proposed Project does not include the construction of commercial units.</p>
<p>Goal 5: Decrease Energy Demand by Reducing Urban Heat Island Effect.</p> <p>Measure 5.1: The Project utilizes tree planting for shade and energy efficiency such as tree planting in parking lots are streetscapes.</p> <p>Measure 5.2: The Project uses light-reflecting surfaces such as enhanced cool roofs on commercial buildings.</p>	<p>Consistent. The Proposed Project will include landscaping and natural areas over 38,235 square feet of the Project site which will reduce heat absorption and increase energy efficiency for the dwellings. The Proposed Project will also be utilizing lighter colors for the townhomes themselves to reduce heat absorption and increase energy efficiency.</p>
<p>Goal 6: Decrease Greenhouse Gas emissions though Reducing Vehicle Miles Traveled.</p> <p>Measure 6.1: Proposed Project streets include sidewalks, crosswalks, and other infrastructure that promotes non-motorized transportation options.</p>	<p>Consistent. The Proposed Project will include sidewalks within the Project site and along Summit Avenue. The Project will also be installing bike lanes to improve bike transit as well.</p>

Sustainable Santee Plan and Goals, and Implementing Measures	Project Consistency Analysis
<p>Measure 6.2: The Proposed Project installs bike paths to improve bike transit.</p>	
<p>Goal 7: Increase the Use of Electric Vehicles</p> <p>Measure 7.1: Install electric vehicle chargers in all new residential and commercial developments:</p> <ul style="list-style-type: none"> • For new Single-Family Residential, install a complete 40 Amp electrical service and one e-charger • For new Multifamily Residential, install e-chargers for 13 percent of total parking. • For new Office Space, Regional Shopping Centers, and Movie Theaters, install e-chargers for 5 percent of total parking spaces. • For new Industrial and other land uses employing 200 or more employees, install e-chargers for 5 percent of total parking spaces. 	<p>Consistent. The Proposed Project will have electric vehicle charger hookups in every garage on the Project site. The Project has 84 garage parking spaces and 21 guest parking spots, and 84 of the garage parking spots will have electric vehicle charging hookups available which amounts to 80 percent of all parking spaces.</p>
<p>Goal 8: Improve Traffic Flow</p> <p>Measure 8.1: Implement traffic flow improvement program. Install smart traffic signals at intersections warranting a traffic signal, or install a roundabout.</p>	<p>N/A. Rezone Site 1 is not near an intersection that would warrant a traffic light or a roundabout to improve traffic flow.</p>
<p>Goal 9: Decrease Greenhouse Gas Emissions through Reducing Solid Waste Generation</p> <p>Measure 9.1: Reduce waste at landfills.</p> <ol style="list-style-type: none"> a. Divert at least 80 percent of waste b. All development through construction and demolition activities to recycle construction and demolition waste. 	<p>Consistent. The Proposed Project will meet the performance metric for Goal 9 within the Sustainable Santee Plan to divert at least 80 percent of solid waste by 2035. Curbside trash, recycling, and yard waste service for future development implemented under the project would be provided by Waste Management. Additionally, future development would be required to comply with the City's construction and demolition recycling ordinance (Santee Municipal Code Section 13.38.060) and Solid Waste Ordinance #3239-A.</p>
<p>Goal 10: Decrease Greenhouse Gas Emissions through Increasing Clean Energy Use</p> <p>Measure 10.1: Increase distributed energy generation within City of Santee by implementing the following applicable photovoltaic (PV) solar systems:</p> <ol style="list-style-type: none"> a. Single-family residential to install at least 2kW per unit of PV solar systems, unless the installation is infeasible due to poor solar resources established in a solar feasibility study prepared by a qualified solar consultant submitted with an application. b. Multifamily residential to install at least 1kW per unit of PV solar systems, unless the installation is infeasible due to poor solar resources established in a solar feasibility study prepared by a qualified solar 	<p>Consistent. The Proposed Project will be installing PV solar panels on the entire roof space of the Project. This will exceed the 1kW per unit required by Measure 10.1.</p>

Sustainable Santee Plan and Goals, and Implementing Measures	Project Consistency Analysis
consultant submitted with an applicant's formal project submitted to the City. c. On commercial buildings, install at least 2kW per square foot of building area (e.g. 2,000 square feet = 3 kW) unless the installation is infeasible due to poor solar resources.	

As demonstrated in Table 8, the Proposed Project meets the requirements of the Sustainable Santee Plan Consistency Checklist and is deemed to be consistent with the Sustainable Santee Plan and is found to have a less than significant contribution to cumulative GHG (i.e., the Project's incremental contribution to cumulative GHG effects is not cumulatively considerable), pursuant to CEQA Guidelines § 15064(h)(3), § 15130(d), and § 15183(b).

Site Specific GHG Analysis

Per **PEIR MM-GHG-1** above, because the update to the Sustainable Santee Plan has not been adopted as of March 29, 2024, a site-specific GHG analysis was prepared (Appendix B) for Rezone Site 1 to determine consistency with the State Scoping Plan and the Sustainable Santee Plan. Although the City has not established a numeric CEQA threshold of significance for GHG emissions, for informational purposes, the following discussion for a numeric threshold is provided for context:

The CEQA Guidelines § 15064.4 does not establish a threshold of significance but states that Lead Agencies may appropriately look to thresholds developed by other public agencies or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (CEQA Guidelines § 16064.7(c)). Various threshold approaches have been recommended, drafted, or adopted by other public agencies. In cases where a lead agency is not relying on a Climate Action Plan (CAP), some agencies have used the County of San Diego screening threshold of 900 metric tons of carbon dioxide (MT CO₂e) annually.⁵ If the CO₂e emissions generated by the Proposed Project are less than 900 MT CO₂e annually, it would have a less than significant GHG impact.⁶ As shown in Table 9, Annual Greenhouse Gas Emissions (MT per year) below, the Proposed Project's GHG emissions would not exceed 900 MT CO₂e annually. The use of the County's GHG threshold is consistent with 15064.7, which allows a lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

5 Ryan Birdseye, Principal, Birdseye Planning Group, LLC, email, April 17, 2025.

6 2015 GHG Guidance, Recommended Approach to Addressing Climate Change in CEQA Documents, County of San Diego Planning & Development Services (PFDS) January 21, 2015.

Table 9: Annual Greenhouse Gas Emissions (MT per year)

Emissions Source	Annual Emissions CO ₂ e for 50 Dwelling Units (Metric Tons/Year)
Construction (Amortized over 30 years)	20
Operational	92
Mobile	451
Total	563
County of San Diego Threshold	900

Source: Air Quality and Greenhouse Gas Study, Birdseye Planning Group (Appendix B)

2. Findings

As demonstrated in the analysis above, the Proposed Project would not generate enough GHG emissions to cumulatively contribute to global climate change; and thus, would not adversely impact the attainment of statewide reductions in GHG emissions. However, the measures implemented by the project to reduce overall GHG emissions would contribute to GHG reduction goals mandated by AB 32. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required.

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.8 Hazards and Hazardous Materials

This section corresponds with the Previous Approved PEIR Section 4.7, *Hazards and Hazardous Materials*.

1. Section 15164 Analysis

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

Previously Approved Project Impact – Less than Significant

With proper use and disposal of hazardous materials as required by state, regional, and local regulations, the Project would not result in hazardous or unhealthful conditions within or in proximity to the Rezone Sites.

Proposed Project Impact – Less than Significant

Materials are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). A hazardous material is defined in the California Health and Safety Code §25501 as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant, present, or potential hazard to human health or safety or to the environment. Additionally, the code states that a hazardous material becomes a hazardous waste once it is abandoned, discarded, or recycled. The transportation, use, and disposal of hazardous materials as well as the potential release of hazardous materials into the environment, are closely regulated through many state and federal laws. Consistent with the PEIR, compliance with these laws would result in less than significant Project level impacts. There are no new or more severe impacts that were not previously evaluated in the EIR.

b) Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Previously Approved Project Impact – Less Than Significant With Mitigation

Future redevelopment or construction activities within the Rezone Sites may pose hazards to the public or the environment through the disturbance of existing contaminated soils, groundwater, or hazardous building materials. Grading and excavation activities could disturb soils and cause contaminants below ground to become airborne. Excavation below the groundwater table or dewatering could bring construction workers in contact with contaminants through skin contact, ingestion, or inhalation. During construction, workers could be exposed to hazardous materials during the demolition of buildings. Numerous structures within the Rezone Sites were constructed before 1978. Demolition of buildings built before 1978 may expose workers to asbestos-containing materials (ACMs) or lead-based paint (LBP). Inhalation of asbestos-containing dust may cause acute or chronic toxicity. Although regulations and standards are in place to protect against the accidental release of asbestos-lead-based paints and other hazardous materials during

demolition, unknown sources of hazardous materials surface or subsurface hazardous materials could potential exist on development sites that may be subject to a release during development. Therefore, impacts associated with the accidental release of hazardous materials during future buildout of the Rezone Sites would be potentially significant. The following mitigation measures were required in the PEIR for the Previously Approved Project:

PEIR MM-HAZ-1: *Applications for future development in the Rezone Sites, wherein the City has determined a potential for impacts to known and unknown hazardous materials sites, shall be required to comply with the following mitigation framework. Future projects shall be required to identify potential conditions that require further regulatory oversight and demonstrate compliance based on the following measures prior to issuance of any permits.*

- a. *A Phase I Environmental Site Assessment (ESA) shall be completed in accordance with American Society of Testing and Materials (ASTM) Standards. If hazardous materials are identified requiring remediation, a Phase II ESA and remediation effort shall be conducted in conformance with federal, state, and local regulations.*
- b. *If the Phase II ESA identifies the need for remediation, then the following shall occur prior to the issuance of grading permits:*
 1. *The applicant shall retain a qualified environmental engineer to develop a soil and/or groundwater management plan to address the notification, monitoring, sampling, testing, handling, storage, and disposal, of contaminated media or substances (soil, groundwater). The qualified environmental consultant shall monitor excavations and grading activities in accordance with the plan. The plans shall be approved by the City prior to development of the site.*
 2. *The applicant shall submit documentation showing that contaminated soil and/or groundwater on proposed development parcels have been avoided or remediated to meet cleanup requirements established by appropriate local regulatory agencies (Regional Water Quality Control Board [RWQCB]/DTSC/DEH) based on the future planned land use of the specific area within the boundaries of the site (i.e., commercial, residential), and that the risk to human health of future occupants of these areas therefore has been reduced to below a level of significance.*
 3. *The applicant shall obtain written authorization from the appropriate regulatory agency (RWQCB/DTSC/DEH) confirming the completion of remediation. A copy of the authorization shall be submitted to the City to confirm that all appropriate remediation has been completed and that the proposed development parcel has been cleaned up to the satisfaction of the regulatory agency. In the situation where previous contamination has occurred on a site that has a previously closed case or on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the DEH shall be notified of the proposed land use.*
 4. *All cleanup activities shall be performed in accordance with all applicable federal, state, and local laws and regulations, and required permits shall be secured prior to commencement of construction to the satisfaction of the City and compliance with*

applicable regulatory agencies such as but not limited to the City of Santee Municipal Code.

Proposed Project Impact – Less than Significant with Mitigation Incorporated

The Project site currently has a single-family residence built before 1978 that will be demolished for the construction of the Proposed Project. As required by **PEIR MM-HAZ-1**, a Phase I Environmental Site Assessment (Phase I ESA) was conducted on the Project site. The Phase I ESA found no recognized environmental conditions (RECs), Controlled RECs (CRECs), or significant data gaps in connection with the subject property and recommended no further investigations were warranted.

However, the Phase I ESA noted that the existing structure on the property was built at a time (circa 1970s) when asbestos-containing materials (ACMs) and lead-based paint (LBP) were more commonly used and, as a result, a pre-demolition LBP and ACM Survey and f hazardous materials are identified requiring remediation, a Phase II ESA and remediation effort shall be conducted in conformance with federal, state, and local regulations, as required per PEIR MM-HAZ-1.

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

Previously Approved Project Impact – Less than Significant

None of the Rezone Sites are within 0.25 mile of an existing school, and consultation with and notification to the Santee School District would not be required. Therefore, the impacts would be less than significant.

Proposed Project Impact – Less than Significant

The nearest school to the Project site is Cajon Park School, which is approximately 0.8 miles south of the Project site. There are no new or more severe impacts that were not previously evaluated in the EIR.

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

Previously Approved Project Impact – Less than Significant

None of the Rezone Sites are listed as hazardous materials sites according to Government Code §65962.5 (Cortese List). Therefore, it is not expected that grading, excavation, or construction activities would result in the release of hazardous materials associated with contaminated soils or underground tanks. Therefore, the program would not result in conditions leading to any reasonably foreseeable upset or accident involving the release of hazardous materials.

Proposed Project Impact – Less than Significant

The Project site is developed as an existing single-family residence. The Project is not located on a site included on a list of hazardous material sites. This is described in the Phase 1 ESA, which is

included in Appendix F. There are no new or more severe impacts that were not previously evaluated in the EIR.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Previously Approved Project Impact – Less than Significant

A portion of the City is located within the Airport Influence Area (AIA) of Gillespie Field. As required by state law, the Previously Approved Project was referred to the Airport Land Use Commission (ALUC) for determination of consistency with the Gillespie Field and MCAS Miramar ALUCPs due to the proposed adoption of zoning changes within the AIA of each airport.

All future development, whether discretionary or by-right, located within the Gillespie Field AIA would be reviewed to ensure that design features are incorporated into the site plan to address identified aircraft safety and noise hazards, consistent with General Plan Policy 7.1. Additionally, as applicable, site-specific land use proposals within the AIA would be routed to the ALUC for a compatibility determination as part of the site-specific development review. Conformance with City and ALUCP regulations would ensure that future development within the Rezone Sites located within the Gillespie Field and MCAS Miramar AIA would be compatible with all safety measures and design guidelines.

Proposed Project Impact – No Impact

Gillespie Field General Aviation Airport is located approximately 3.5 miles away, and the Project is not located within an airport land use plan. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. There are no new or more severe impacts that were not previously evaluated in the EIR.

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

Previously Approved Project Impact – Less than Significant

The Previously Approved Project does not propose any changes in the City's existing circulation network, and no land uses are proposed that would impair the implementation of or physically interfere with the City's emergency response plan, evacuation routes; or conflict with any of the Multi-Jurisdictional Hazard Mitigation Plan's specific hazard mitigation goals, objectives, and related potential actions. Specifically, the Multi-Jurisdictional Hazard Mitigation Plan requires each jurisdiction to develop and publish evacuation procedures that are published and available to the public. The City provides educational materials related to emergency preparedness. All residents of the City have access to the materials, which are also included in all Community Emergency Response Team training and information. Furthermore, applications for all future projects within the Rezone Sites, whether discretionary or by-right, would be reviewed and approved by the Santee Fire Department before the issuance of the building permit.

Proposed Project Impact – Less than Significant

The City has a Multi-Jurisdictional Hazard Mitigation Plan, and the City regularly updates its emergency operations plan and provides ongoing training to maintain compliance with the Statewide Emergency Management System (SEMS), increasing preparedness in the event of a disaster. The Santee Fire Department is the City's lead for emergency preparedness and emergency management, and provides emergency response to earthquakes, floods, explosions, fires, hazardous materials, rescue, and medical problems in the City. The Project would not be along any major roadways that could congest evacuation routes or conflict with the plans outlined in the Hazard Mitigation plan. The Project would have to be reviewed and approved by the Santee Fire Department before issuance of a grading permit to assure compliance with adopted emergency response plans. The City has signed automatic aid agreements with all surrounding communities on first alarm or greater emergency events. There are no new or more severe impacts that were not previously evaluated in the EIR.

g) Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Previously Approved Project Impact – Less than Significant

The Previously Approved Project does not propose the construction of new housing or other development; rather, it provides capacity for future development consistent with state Housing Element Law. Future development located within the Very High Fire Hazard Safety Zone (VHFHSZ) would be required to adhere to California Fire Code (CFC) Title 19, Division 1, Section 3.07(b), requiring a minimum 30-foot brush clearance around structures for fire safety. City General Plan policies 4.2 through 4.13 guide the minimization of fire hazards including ensuring adequate response times, setting standards for emergency access, structural standards, and other planning design measures required to be considered in all new developments. Additionally, future discretionary projects would require review by the Building Official/Fire Marshal.

Proposed Project Impact – Less than Significant

The Project site is currently within the VHFHSZ and therefore is required to comply with CFC and General Plan regulations regarding fire safety. There are no new or more severe wildland fire impacts that were not previously evaluated in the Final PEIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Hazards and Hazardous Materials would be less than significant with the implementation of **PEIR MM-HAZ-1**, which requires that if hazardous materials are identified during construction activities, a Phase II ESA and remediation effort shall be conducted in conformance with federal, state, and local regulations. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.

2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required.

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.9 Hydrology and Water Quality

This section corresponds with the Previous Approved PEIR Section 4.8, *Hydrology and Water Quality*.

1. Section 15164 Analysis

a) Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Previously Approved Project Impact – Less than Significant

While the development of the Rezone Sites has the potential to increase the amount of pollutants discharged into surface waters, all future development, whether discretionary or by-right, would be subject to federal, state, and local regulations aimed at controlling water quality impacts.

Proposed Project Impact – Less than Significant

Construction Impacts

For the management of storm water during construction, Santee is required to comply with the Regional Water Quality Control Board's National Pollutant Discharge Elimination System (NPDES) General Permit (No. CAS 000002), which consists of wastewater discharge requirements for storm water and urban runoff.

Post-Instruction Impacts

The San Diego Regional Water Quality Control Board's revised MS-4 Permit updated and expanded the stormwater requirements for new developments and redevelopments. As required by the MS-4 Permit, the City has developed a BMP Design Manual (Manual) that the Project would be required to comply with during post-construction operations. The Manual provides updated procedures for planning, preliminary design, selection, and design of permanent stormwater BMPs based on the performance standards presented in the MS-4 permit. Per the Storm Water Quality Management Plan (SWQMP) prepared for the Proposed Project (Appendix G), the pre-project site drains generally southwest to a single point of compliance (POC). The POC is located at the southwest corner of the property, at the edge of Summit Avenue.

The pre-project drainage area equals 10.0 acres. Based on available data, it is anticipated that peak flows from a 100-year, 6-hour storm event will equal 16.3 cubic feet per second (CFS) for the pre-project site. The post-project drainage area equals 10.0 acres. Mitigated peak flows in the post-project condition are expected to be less than pre-project flows. Drainage patterns for the proposed condition will remain similar to drainage patterns in the pre-project condition. In post-project conditions, there will be one drainage management area (DMA), and the entirety of the Project will drain into an underground vault. Runoff from the vault will then be treated by the modular wetland system before discharging off-site. After leaving the site, flows will be conveyed along the curb and gutter on Summit Avenue to a curb inlet located at the intersection of Princess Joann Road and Summit Avenue. Flows from the curb inlet will be conveyed to the San Diego River, which then discharges to the Pacific Ocean. There are no new or more severe impacts that were not previously evaluated in the EIR.

b) Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Previously Approved Project Impact – Less than Significant

The Project does not propose the construction of new housing or other development. Development at the Rezone Sites would occur on a project-by-project basis, resulting in the redevelopment of existing developed sites that have existing impervious surfaces; a few sites, however, are currently vacant with pervious surfaces that would allow for groundwater infiltration. Both redevelopment and new development on vacant sites would be required to comply with applicable storm water management requirements that focus on retention and infiltration of waters on-site. Redevelopment within the Rezone Sites with existing development would not result in a substantial change in impervious surfaces, as these sites already support some level of development. Additionally, development at all Rezone Sites would be required to comply with City General Plan policies and regulations that prioritize infiltration and treatment of storm water and generally require increased on-site infiltration and higher standards of water quality protection compared to water quality standards that would have been implemented on existing developed sites. While the City does not have a groundwater management plan – as one is not required for the City's groundwater basins under the Sustainable Groundwater Management Act – the Project would not obstruct the implementation of ongoing sustainable use of the City's groundwater resources as the City is not dependent on groundwater.

Proposed Project Impact – Less than Significant

The City receives 100 percent of its water supply from the Padre Dam Municipal Water District (District), which relies on surface water purchases from the San Diego County Water Authority (SDCWA). The City of Santee and the District's service area are underlain by the Santee Basin aquifer, which is part of the San Diego River Valley Groundwater Basin. The Santee Basin aquifer is designated by the Department of Water Resources (DWR) as a very low-priority, unadjudicated groundwater basin that is not critically over-drafted. (2020 UWMP). The City's and District's use of groundwater has not changed since the Final PEIR was prepared. According to the District's 2020 Urban Water Management Plan (UWMP), the District uses a very small amount of groundwater. There are no new or more severe impacts that were not previously evaluated in the EIR.

c) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i) result in substantial erosion or siltation on- or off-site;**
 - ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;**
 - iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
 - iv) impede or redirect flood flows?**
-

Previously Approved Project Impact – Less than Significant

While development of the Rezone Sites has the potential to alter drainage patterns or increase storm water runoff resulting in increased erosion, and otherwise impact the existing drainage system, all future development would be subject to federal, state, and local regulations aimed at reducing polluted storm water and avoiding overloading the City's drainage system. Both ministerial and discretionary development would be required to adhere to regulatory requirements including the City's Stormwater requirements for the elimination or reduction of storm water runoff. Impacts associated with drainage patterns and storm water runoff would be less than significant.

Proposed Project Impact – Less than Significant

The proposed drainage system will collect surface flows via grate and curb storm drain inlets. Flows will be conveyed via underground storm drains to an underground vault, then to a modular wetland system located at the southwest corner of the property. The modular wetland system will discharge flows to the point of compliance (POC) on Summit Avenue. The pre-project drainage area equals 10.0 acres. Based on available data, it is anticipated that peak flows from a 100-year, 6-hour storm event will equal 16.3 CFS for the pre-project site. The post-project drainage area equals 10.0 acres. Mitigated peak flows in the post-project condition are expected to be less than pre project flows. There are no new or more severe impacts that were not previously evaluated in the EIR.

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

Previously Approved Project Impact – Less than Significant

Future development of the Rezone Sites would be required to conform to applicable federal, state, and City regulatory standards to effectively avoid and/or address potential impacts associated with development in 100-year flood zones. Rezone Sites are not within an area anticipated to be adversely affected by a tsunami. Impacts related to flood hazards would be less than significant.

Proposed Project Impact – No Impact

As shown in the Santee General Plan Safety Element, Figure 8-1, the Project site is not located within the floodway of the San Diego River. Additionally, as shown in PEIR Figure 4.8-3, Dam Inundation, the Proposed Project site is not located within a dam inundation area. The site is located inland, and therefore, is not within an area that could be affected by a tsunami. There are no new or more severe flood hazard impacts that were not previously evaluated in the PEIR.

e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Previously Approved Project Impact – Less than Significant

The Project does not propose the construction of new housing or other development. Development at the Rezone Sites would occur on a project-by-project basis, resulting in redevelopment of existing developed sites that have existing impervious surfaces; a few sites, however, are currently vacant with pervious surfaces that would allow for groundwater infiltration. Both redevelopment and new development on vacant sites would be required to comply with applicable storm water management requirements, which focus on retention and infiltration of waters on-site. Redevelopment within the Rezone Sites with existing development would not result in a substantial change in impervious surfaces, as these sites already support some level of development.

Additionally, development at all Rezone Sites would be required to comply with City General Plan policies and regulations that prioritize infiltration and treatment of storm water and generally require increased on-site infiltration and higher standards of water quality protection compared to water quality standards that would have been implemented on existing developed sites. While the City does not have a groundwater management plan – as one is not required for the City's groundwater basins under the Sustainable Groundwater Management Act – the Project would not obstruct the implementation of ongoing sustainable use of the City's groundwater resources, as the City is not dependent on groundwater (City of Santee 2003b).

Proposed Project Impact – Less than Significant

The San Diego Regional Water Quality Control Board (RWQCB) maintains a Basin Plan that is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. The City also prepares and maintains a Jurisdictional Urban Runoff Management Plan to address local water quality issues, with a primary goal to reduce or eliminate the transportation of contaminants. Compliance with these plans is achieved through adherence to the permitting programs and review processes.

See the response to Threshold B above.

There are no new or more severe impacts that were not previously evaluated in the EIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Hydrology and Water Quality would be less than significant with the implementation of mandatory flood control and drainage

requirements, the preparation of a Storm Water Quality Management Plan, and compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit (No. CAS 000002), which consists of wastewater discharge requirements for storm water and urban runoff. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required.

Section 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.10 Land Use and Planning

This section corresponds with the Previous Approved PEIR Section 4.9, Land Use and Planning.

1. Section 15164 Analysis

a) Would the Project physically divide an established community?

Previously Approved Project Impact – Less than Significant

None of the Housing Sites would require any new major infrastructure or improvements that could physically divide an established community. Therefore, the Project would not physically divide an established community, and impacts would be less than significant.

Proposed Project Impact EIR states LTS – No Impact

The physical division of an established community is typically associated with the construction of a linear feature, such as a major highway or roadway, railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility within an existing community or between a community and an outlying area. The Project site is currently served by a local and regional circulation network. No new roads or transportation facilities are proposed as part of the Project, nor would the Project alter existing roads or transportation facilities. There are no new or more severe community land use impacts that were not previously evaluated in the Final PEIR.

b) Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Previously Approved Project Impact – Significant and Unavoidable

Impacts associated with policy consistency for future development at the Rezone Sites would be less than significant, except concerning the future development within Airport Influence Areas (AIAs) of Gillespie Field and MCAS Miramar, which may exceed density limits for the corresponding airport safety zones and is a potentially significant impact.

Proposed Project Impact – Less than Significant

The Proposed Project is consistent with all applicable land use plans and policies as discussed in Table 10 below.

Table 10: Proposed Project Consistency with Land Use Plans and Policies

Land Use Plans and Policies	Proposed Project Consistency
State Regulations, Plans, and Policies	
State Housing Element Law (California Government Code §65583 et seq.): Cities are required to update their Housing Elements every 8 years. Cities are also required to demonstrate in their Housing Element that the land inventory is	Consistent. The City prepared its 6 th Cycle Housing Element, adopted by the City Council on July 14, 2021, which covers the planning period from April 15, 2021, to April 15, 2029 (8 years). The Housing Element identifies 34 sites throughout the City with the capacity to accommodate the City's assigned growth/Regional Housing Needs Assessment (RHNA).

Land Use Plans and Policies	Proposed Project Consistency
adequately zoned to accommodate that jurisdiction's share of the regional growth.	minimum of 1,219 housing units. Housing Element Programs 9 and 10 commit the City to evaluate candidate sites and rezone as appropriate to achieve adequate housing capacity. The Proposed Project is included as Rezone Site 1. Therefore, the project is consistent with State Housing Element Law and land inventory/regional growth requirements.
Regional Regulations, Plans, and Policies	
<p>San Diego Forward: The Regional Plan: San Diego Forward, adopted in 2021, further identified GHG reduction strategies through transportation and land use planning as follows:</p> <ul style="list-style-type: none"> • Connect communities through multi-modal transportation choices. • Increase a variety of housing options in proximity to existing and planned transit; 	<p>Consistent. According to the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), several Rezone Sites are located in areas identified as Smart Growth Opportunity Areas on the SANDAG Smart Growth Concept Map. Specifically, the Rezone Sites within the Town Center Specific Plan (TCSP) are served by local and regional transit lines. However, Rezone Site 1 is not located within a Smart Growth Opportunity Area. Notwithstanding, the Proposed Project is consistent with the following Smart Growth strategies:</p> <ol style="list-style-type: none"> 1. Providing more housing options. 2. Help reach regional and state GHG emission reduction targets through compliance with the Sustainable Santee Plan. 3. Providing EV charging stations. 4. Providing sidewalks that connect to the existing network. <p>Additionally, as discussed in Section 1619.7, Greenhouse Gas Emissions, Table 8, Sustainable Santee Plan Consistency Checklist, the Proposed Project is consistent with the Sustainable Communities Strategy and Regional Transportation Plan as the Project would support the goals of placing higher density housing in areas most able to support the residential growth.</p>
Local Regulations, Plans, and Policies	
<p>Multiple Species Conservation Program (MSCP): The City's Draft MSCP Subarea Plan is used by the City as a biological resource guidance document.</p>	<p>Consistent. Rezone Site 1 is a partially developed residential lot surrounded by a mixture of large, continuous stretches of high-quality Diegan coastal sage scrub to the north, east, and west, and other residential developments. The open coastal scrub areas are designated as part of a core biological resource area in the County MSCP (County of San Diego 1998). Sycamore Canyon/Goodan Ranch County Preserve and Sycamore Canyon Open Space Preserve occur approximately 2.5 miles north of the survey area. Diegan coastal sage scrub in the northeastern and eastern portions of the survey area has direct connectivity to these preserves. Fully conserved land with connectivity to these preserves occurs northeast of the survey area, and Santee Lakes Recreation Preserve occurs approximately 1.4 miles west of the survey area. The San Diego River occurs approximately 1.9 miles south of the survey area but is separated from the survey area by heavy residential development. Although the survey area is partially developed and bordered by densely</p>

Land Use Plans and Policies	Proposed Project Consistency
	<p>developed areas to the south, the survey area contains patches of native habitat and open areas that have connections to open space within the Sycamore Canyon/Goodan Ranch County Preserve, Sycamore Canyon Open Space Preserve, and the Santee Lakes Recreation Preserve. Therefore, the survey area may be used as a movement corridor for large mammals and mesocarnivores looking to access open space and avoid more developed portions of this immediate area.</p> <p>Through compliance with the Rezone Site 1 MM-BIO-1 through MM-BIO-6, the Proposed Project would be consistent with the goals of the City's Draft MSCP Subarea Plan.</p>
<p>General Plan, Land Use Element: The Land Use Element provides goals, objectives, and policies that guide City decision-makers in directing future growth and development and regulates the types of land uses and land use intensities within the City. The Proposed Project site has a General Plan land use designation of Medium Density Residential (MDR), which allows a density of 7-14 dwelling units per acre (du/ac).</p>	<p>Consistent. The Proposed Project has a density of 9 dus/ac, which is consistent with the MDR General Plan land use designation.</p>
<p>Municipal Code: Zoning Ordinance: The Zoning Ordinance implements the City's General Plan by establishing site-specific development use regulations and development standards.</p>	<p>Consistent. Based on a review of the Development Review (DR-2023-0007) filed by the Project Proponent, the Proposed Project meets the requirements of Title 13 of the Santee Municipal Code, which is the city's Zoning Ordinance and is the primary tool for implementing the General Plan.</p>

Based on the analysis above, impacts are less than significant. There are no new or more severe land use plan, policy, or regulation impacts that were not previously evaluated in the Final PEIR.

2. Section 15183 Finding

As demonstrated in the analysis above, and throughout this document, impacts relating to Land Use and Planning are less than significant because the Proposed Project is consistent with the density allowed under the General Plan land use designation of MDR and is consistent with all General Plan policies and municipal code adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.

5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required

Section 15162

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.11 Mineral Resources

This section corresponds with the Previous Approved PEIR Section 8.3, Mineral Resources.

1. Section 15164 Analysis

-
- a) **Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
 - b) **Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**
-

Previously Approved Project Impact – Less than Significant

The PEIR for the Previously Approved Project found mineral resources not to be significant. Rezone Site 1 is designated as MRZ-3, which is designated as areas that contain known mineral deposits, but the significance of which cannot be evaluated from available data. While these lands may support mineral resources, mining operations at these sites would not be feasible considering the proximity to sensitive receptors and existing established neighborhoods. Furthermore, the Rezone Sites are not designated as locally important mineral resource recovery sites in the Santee General Plan. Therefore, the project would not result in the loss of availability of a known mineral resource or locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan, and impacts would be less than significant.

Proposed Project Impact – Less than Significant Impact

For the reasons stated above, the Proposed Project would have no new or more severe impacts than evaluated in the PEIR for the Previously Approved Project.

2. Findings

As demonstrated in the analysis above, and throughout this document, impacts relating to Mineral Resources are less than significant because the Proposed Project is not designated as a mineral resource recovery site by the General Plan and is not being used for mineral extraction. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.

5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.12 Noise

This section corresponds with the Previous Approved PEIR Section 4.10, Noise.

1. Section 15164 Analysis

a) **Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Previously Approved Project Impact – Significant and Unavoidable

Buildout of the Project would result in a significant noise increase over existing ambient noise levels at nine of the analyzed roadway segments. The Noise Element contains Policies 2.2 and 2.3 that require new development to mitigate the noise impact on existing uses resulting from new development. Possible noise-reduction measures would include retrofitting older homes with new window and door components with higher sound transmission class (STC) ratings. However, for existing uses, it cannot be determined whether the existing structures contain adequate attenuation to reduce interior noise to the 45 dB(A) Ldn standard nor what measures would be required to retrofit these structures. Therefore, impacts associated with increases in ambient noise levels to existing sensitive land uses are significant and unavoidable.

Future development at the Rezone Sites could expose sensitive receivers to exterior noise levels that exceed 65 CNEL. Exterior noise levels are projected to exceed 65 dB(A) Ldn at Rezone Sites 1 through 10, Sites 17 and 18, Sites 20A and 20B, Site 24, Site 25, and Site 29. Therefore, impacts to sensitive receivers from exterior noise levels from vehicle traffic at these Rezone Sites would be significant (Impact NOS-2), but can be mitigated to a level of less than significant with mitigation measure **PEIR MM-NOS-1**.

Regarding interior noise, as required by the CCRs (see Section 4.10.2.1 of the PEIR), future ministerial and discretionary projects would be required to demonstrate that interior noise levels would be reduced to 45 dB(A) Ldn or less. Therefore, vehicle traffic noise affecting building interiors would be less than significant.

The City requires that noise from new stationary sources comply with the requirements of the City's Noise Abatement and Control Ordinance, which provides general noise regulations, prohibits disturbing, excessive, or offensive noises, and places noise limitations on motorized equipment and loading and unloading operations. Noise Abatement and Control Ordinance requirements would reduce nuisances to sensitive land uses. With the enforcement of the Noise Abatement and Control Ordinance, noise impacts associated with stationary sources of noise would be less than significant.

Construction activities associated with any individual development may occur near noise-sensitive receptors and noise disturbances may occur. Without project-specific information to evaluate potential construction noise impacts and specific distances to sensitive receptors, impacts are considered significant at this programmatic level of review (Impact NOS-3). Mitigation Measure **PEIR MM-NOS-2** would reduce potentially significant impacts related to construction noise to less than significant.

PEIR MM-NOS-1: Applications for future development, where the City has determined a potential for land use compatibility impacts related to vehicle traffic, shall be required to comply with the following mitigation measures:

Prior to the issuance of a permit to develop at the Rezone Sites, the City shall assess whether proposed noise-sensitive receivers or associated noise-sensitive exterior use areas would be subject to transportation noise levels that potentially conflict with policies established in the City General Plan. Based on the analysis herein, the following sites are anticipated to require implementation of this measure: Sites 1 through 10, Sites 17 and 18, Sites 20A and 20B, Site 24, Site 25, and Site 29. Where noise levels would potentially conflict with City policies, the City shall require preparation of a noise technical analysis by a qualified professional that demonstrates (1) noise levels would not exceed the City's General Plan Noise Element compatibility guidelines, or (2) noise levels which already exceed the levels considered compatible for that use are not increased by 3 dB or more. In lieu of detailed analysis, the City will accept information demonstrating that noise reduction techniques have been incorporated that would reduce noise levels at exterior use areas consistent with City standards. Noise reduction techniques may include site design (including building orientation) that provides noise barriers free of gaps and obstructs line-of-sight between the source and receiver, and has a weight of at least 2 pounds per square foot, or other noise reduction technique as applicable.

PEIR MM-NOS-2: The City shall review applications for future development to determine applicability of a Construction Noise Best Management Plan. An applicant may provide site-specific noise generation information demonstrating that construction activities will not exceed 75 dB at the nearest sensitive receptor. If this site-specific information is not provided, a construction best management plan shall be required when the construction site is located within 150 feet of a sensitive receptor. The criteria of 150 feet is provided as a screening tool for use by the City, based on an average construction noise level of 83 dB, attenuating to 75 dB at 150 feet.

Construction Noise Best Management Practice Plan

Where applicable based on the criteria provided above, the City shall require preparation and implementation of a best management practice plan that demonstrates how noise levels would be minimized to comply with the time of day restrictions and notification requirements of Santee Municipal Code Section 5.04.090.

Noise reduction measures can include, but are not limited to, the following:

1. Construction equipment with a manufacturer's noise rating of 85 dB(A) L_{max} or greater may only operate at a specific location for 10 consecutive workdays. If work involving such equipment would involve more than 10 consecutive workdays, a notice must be provided to all property owners and residents within 300 feet of the site no later than 10 days before the start of construction. The notice must be approved by the City describe the proposed project and the expected duration of work and provide a point of contact to resolve noise complaints.

2. *Idling times for noise-generating equipment used in demolition, construction, site preparation, and related activities shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes.*
3. *Demolition, construction, site preparation, and related activities within 100 feet from the edge of properties with existing, occupied noise-sensitive uses shall incorporate all feasible strategies to reduce noise exposure for noise-sensitive uses, including:*
 - *Provide written notice to applicable noise-sensitive land uses at least two weeks before the start of each construction phase of the construction schedule;*
 - *Ensure that construction equipment is properly maintained and equipped with noise control components, such as mufflers, following manufacturers' specifications;*
 - *Re-route construction equipment away from adjacent noise-sensitive uses;*
 - *Locate noisy construction equipment away from surrounding noise-sensitive uses;*
 - *Use sound aprons or temporary noise enclosures around noise-generating equipment;*
 - *Position storage of waste materials, earth, and other supplies in a manner that will function as a noise barrier for surrounding noise-sensitive uses;*
 - *Use the quietest practical type of equipment;*
 - *Use electric-powered equipment instead of diesel or gasoline engine-powered equipment;*
 - *Use shrouding or shielding and intake and exhaust silencers/mufflers; and*
 - *Other effective and feasible strategies to reduce construction noise exposure for surrounding noise-sensitive uses.*
4. *For the construction of buildings that require the installation of piles, an alternative to the installation of piles by hammering shall be used where sensitive receptors are located within 150 feet. This could include the use of augured holes for cast-in-place piles, installation through vibration or hydraulic insertion, or another low-noise technique.*

Proposed Project Impact – Less than Significant with Mitigation Incorporated

The future noise environment would be a result of vehicle traffic on Summit Avenue and a future extension of Magnolia Avenue. Summit Avenue is currently an undesignated roadway with no daily vehicle counts available. Summit Avenue is planned to be a Collector Residential Roadway and is projected to carry 100 cars per day. The vehicle speed of the road is 25 mph, and the traffic mix is 100 percent cars and is assumed to remain that way in the future. The future Magnolia Avenue extension is planned to be a Parkway roadway and is projected to have a future volume of 2,300 cars, a speed limit of 40 mph, and a traffic mix of 100 percent cars. The open space areas in the Project are the Neighborhood Amenity at the northwest corner and two paseos between northern buildings.

According to the Noise Analysis Report for the Project (Appendix H), the future noise levels impacting the outdoor use areas would be the result of vehicular traffic generated by 50 dwelling units (which is more than the 42 dwelling units proposed and less than what was anticipated in the

PEIR) and would be approximately 57dBA Ldn at the Neighborhood Amenity, and less at all building façades and other outdoor use areas. These noise levels are considered Normally Acceptable at multifamily residential land uses by the City of Santee and less than the traffic noise generated by 50 dwelling units. Additionally, because the traffic noise levels are less than significant, the noise reduction techniques described in PEIR MM-NOI-1 are not required.

Construction noise will have a temporary or periodic increase in the ambient noise level above the existing levels within the Project vicinity. Noise levels will be loudest during site preparation and grading which could require the use of heavy equipment such as bulldozers, loaders, scrapers, and haul trucks. The Cadna/A industrial noise prediction model was used in the Project's Noise Analysis to estimate construction noise levels and found that the closest-occupied residential properties around the site would experience construction-generated noise levels from approximately 68 to 71 dBA. As the construction noise impact at the nearest receptors is estimated to be below the threshold in MM-NOS-2 of 75 dBA, MM-NOS-2 is not required. The Proposed Project would have no new or more severe impacts than evaluated in the PEIR for the Previously Approved Project.

b) Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Previously Approved Project Impact – Potentially Significant

Construction details, locations, and equipment for future project-level developments under the Project are not known at this time but may cause vibration impacts. Impacts related to vibration associated with future development within the Rezone Sites would be potentially significant. Therefore, the following mitigation measures were required:

PEIR MM-NOS-3: *Applications for future development, where the City has determined a potential for vibration impacts in relation to sensitive receptors, shall be required to comply with the following mitigation measure:*

Prior to the issuance of a permit to develop at the Rezone Sites, the City shall determine whether the construction process will require equipment or activities that may result in vibration, such as pile driving. For projects requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. These distances are based on reference vibration levels generated by pile drivers and vibratory rollers and standard vibration propagation rates as published by the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual (FTA 2018). This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels

would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.

Proposed Project Impact – Less Than Significant Impact with Mitigation Incorporated

The City of Santee does not have any policies as it relates to groundborne vibration. However, **PEIR MM-NOS-3** requires that projects do not exceed the FTA thresholds of 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry. Additionally, the City of Santee Noise Abatement Ordinance (Chapter 5.04 of the Santee Municipal Code) restricts hours and days as well as establishes property lime limits for stationary noise generators in residential areas, including equipment with vibration impacts.

This analysis focuses on the potential ground-borne vibration associated with vehicular traffic and construction activities. Ground-borne vibration levels from automobile traffic are generally overshadowed by vibration generated by heavy trucks that roll over the same uneven roadway surfaces. However, due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way and rarely results in vibration levels that cause damage to buildings in the vicinity. However, while vehicular traffic is rarely perceptible, construction has the potential to result in varying degrees of temporary ground vibration, depending on the specific construction activities and equipment used. Ground vibration levels associated with various types of construction equipment are summarized in Table 11.

Table 11: Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet	PPV (in/sec) at 10 feet
Small bulldozer	0.003	0.012
Vibratory roller	0.210	0.830
Loaded Trucks	0.076	0.300
Large bulldozer	0.089	0.352

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, September 2018.

The closest residence to the Project property line is located at 10224 Noble Way and is 10 feet from the property line. The estimated construction vibration level from a vibratory roller (worst case scenario) measured at 10 feet would create a vibration level of 0.830 in/sec, which will exceed the 0.2 in/sec threshold, therefore the Project is required to adhere to the conditions in **PEIR MM-NOS-3** which requires the use of static rollers as opposed to vibratory rollers.

With the inclusion of **PEIR MM-NOS-3**, there are no new or more severe vibration impacts that were not previously evaluated in the Final PEIR.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?**
-

Previously Approved Project Impact – Less than Significant

Gillespie Field Airport and MCAS Miramar are located in the vicinity of the City. Gillespie Field is located outside the City limits, within the adjacent City of El Cajon, and lands adjacent to the western boundary of the northern portion of the City are part of MCAS Miramar. The Rezone Sites are located outside the 65 CNEL aircraft noise contours. Therefore, the project would not expose people to significant aircraft noise levels. Impacts would be less than significant.

Proposed Project Impact – No impact

The Project is located approximately 3.5 miles north of the Gillespie Field General Aviation Airport. According to the Gillespie Field ALUCP Noise Compatibility Policy Map (San Diego County Airport Land Use Commission 2010) the Project site is located outside the 60 CNEL Noise Contour. There are no new or more severe airport land use plan impacts that were not previously evaluated in the Final PEIR.

2. Findings

As demonstrated in the analysis above, and throughout this document, impacts relating to Mineral Resources are less than significant because the Proposed Project is not designated as a mineral resource recovery site by the General Plan and is not being used for mineral extraction. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.13 Population and Housing

This section corresponds with the Previous Approved PEIR Section 4.1.1, Population and Housing.

1. Section 15164 Analysis

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?**
-

Previously Approved Project Impact – Less than Significant

The Previously Approved Project would result in the adoption of rezones required to implement the 6th Cycle Housing Element. SANDAG has allocated the City its share of the regional housing need for the 2021-2029 period based on several factors, including recent growth trends, income distribution, and capacity for future growth. The proposed rezoning would result in the potential future construction of up to 1,945 residential units, which more than accommodates the City's RHNA allocation of 1,219 units. Rezones beyond the 1,219 RHNA allocation have been proposed to provide flexibility for decision-makers to adopt all or a portion of the proposed rezones. The additional rezone would also provide a buffer should the City's RHNA allocation increase in the future. The additional rezones provide capacity for projected growth in the region. Considering the rate of growth and barriers to housing development, the additional capacity would not induce unplanned population growth in the region but would provide additional opportunities to achieve the buildout of the required RHNA allocation.

The region needs to plan for a 13.2 percent increase in population, while the City needs to plan for an 11.8 percent increase in population. The Project would facilitate land use changes in the City that would allow the City and the region to achieve their housing goals. The Project would further implement SANDAG's vision and goals by placing higher density in areas most able to support residential growth, including existing infrastructure and access to transit, and would therefore be consistent with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). State requirements allow for ministerial approvals of certain housing projects that include an affordable component, which would facilitate and encourage the construction of housing in the City.⁷ Therefore, the Previously Approved Project would not induce unplanned population growth, and impacts would be less than significant.

Proposed Project Impact – Less than Significant

As noted above, the Previously Approved Project would result in the potential future construction of up to 1,945 residential units, which more than accommodates the City's RHNA allocation of 1,219 units. Rezones beyond the 1,219 RHNA allocation have been proposed to provide flexibility for decision-makers to adopt all or a portion of the proposed rezones. The additional rezone would also provide a buffer should the City's RHNA allocation increase in the future.

⁷ City of Santee City Council Resolution No. 125-2022, p.58, <https://www.cityofsanteeca.gov/home/showpublisheddocument/22754/638007574476570000>.

The Proposed Project proposes 42 dwelling units, which represents 2.15 percent of the future construction of 1,945 residential units and is within the projected number of residential units analyzed in the PEIR. Considering the rate of growth and barriers to housing development, the Proposed Project would not induce unplanned population growth in the region but would provide additional opportunities to achieve the buildout of the required RHNA allocation of 1,219 plus the 726 residential “buffer” units as described in the Housing Element. There are no new or more severe land use plan, policy, or regulation impacts that were not previously evaluated in the Final PEIR.

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

Previously Approved Project Impact – Less than Significant

Future redevelopment within Rezone Sites that support residential land uses would have the potential to displace some people and housing through the demolition of existing residential structures. However, for each home that would be removed, more housing units would be provided in its place, which would accommodate more people and ensure no net loss of housing. Therefore, impacts would be less than significant.

Proposed Project Impact – Less than Significant Impact

A single-family structure currently exists on the Proposed Project site. The removal of the existing residences would not displace a substantial number of people or necessitate the replacement of housing elsewhere, because each home would be replaced on-site to ensure no net loss of housing. There are no new or more severe land use plan, policy, or regulation impacts that were not previously evaluated in the Final PEIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Population and Housing are less than significant because the Proposed Project is located close to other residential developments with existing infrastructure and utilities adjacent to it, and although it would displace one existing home, it will replace it. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.14 Public Services

This section corresponds with the Previous Approved PEIR Section 4.12, *Public Services and Recreation*.

1. Section 15164 Analysis

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

Previously Approved Project Impact – Less than Significant

Fire Protection: Future discretionary and/or by-right development within the Rezone Sites would not directly result in sufficient demand to require the construction of new fire facilities. While each incremental housing development would pay Development Impact Fees (DIF) toward anticipated fire facility needs, the Previously Approved Project would not warrant the construction of a new facility at this time. Construction of any future fire facilities would be evaluated under a separate environmental review and approval. Project impacts associated with the construction of fire protection facilities would be less than significant.

Police Protection: Future discretionary and/or by-right development within the Rezone Sites would not directly result in sufficient demand to require the construction of new police facilities, since each incremental housing development would pay DIF toward anticipated facility needs, and the City's police department would be involved in the development review process. Construction of any future police facilities would be evaluated under a separate environmental review and approval. Project impacts associated with the construction of police facilities would be less than significant.

Schools: Development within the Rezone Sites would not directly result in sufficient demand to require construction of new school facilities, based on the capacity at existing schools and the fact that future housing development would be required to pay its SB 50 share as required by the Santee School District (SSD) and the Grossmont Union High School District (GUHSD) toward anticipated facility needs. Construction of any future school facilities would be evaluated under a separate environmental review and approval. Payment of GUHSD fees consistent with SB 50 and would ensure that impacts associated with the construction of schools would be less than significant.

Other Public Facilities: Development within the Rezone Sites would not directly result in sufficient demand to require construction of new library facilities, since each incremental housing development would pay its fair share toward anticipated library facility needs. Construction of any future library facilities would be evaluated under a separate environmental review and approval. Project impacts associated with the construction of libraries would be less than significant.

Proposed Project Impact – Less than Significant

The Project site is served by the Santee Fire Department and the San Diego County Sheriff's Department. Fire Station 4 is located 3.4 miles south of the Project site on Cottonwood Avenue, and the San Diego County Sheriff's Department is located approximately 3.2 miles south of the Project site on Cuyamaca Street. The Project area is within the boundaries of the Santee School District. There are no public parks within the Project site; nearby parks include Woodglen Vista Park approximately 0.8 miles to the south and Town Center Park East approximately 2.5 miles to the south. Payment of the required Development Impact Fees would ensure that the Project provides its fair share of funds for additional fire, police, and school services and resources. There are no new or more severe impacts that were not previously evaluated in the EIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Public Services would be less than significant because all public facilities and services are available to serve the Proposed Project. Additionally, development impact fees are required to offset the construction of future facilities required for the overall growth of the City. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.15 Recreation

This section corresponds with the Previous Approved PEIR Section 4.12, *Public Services and Recreation*.

1. Section 15164 Analysis

- a) **Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
 - b) **Include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?**
-

Previously Approved Project Impact – Less than Significant

Development within the Rezone Sites would not directly result in sufficient demand to require construction of new park facilities, since each incremental housing development would pay its fair share toward anticipated park needs. Construction of any future parks would be under a separate environmental review and approval. Impacts associated with park and recreation facilities would be less than significant.

a) – b) Proposed Project Impact – Less than Significant

The City of Santee maintains several parks of varying sizes, including community parks, neighborhood parks, trails, and recreational facilities that allow for both active and passive recreation. Existing public parks and recreational facilities in the Project area include Woodglen Vista Park approximately 0.8 miles to the south and Town Center Park East approximately 2.5 miles to the south. As the Project proposes townhomes, the demand for parks and recreational facilities would increase; however, payment of the required Development Impact Fees would ensure that the Project provides its fair share of funds for parks and recreation expansion and maintenance. There are no new or more severe impacts that were not previously evaluated in the EIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Recreation would be less than significant because the payment of the required Development Impact Fees would ensure that the Project provides its fair share of funds for parks and recreation expansion and maintenance. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.

4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.16 Transportation

This section corresponds with the Previous Approved PEIR Section 4.13, *Transportation*.

1. Section 15164 Analysis

a) Would the Project conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Previously Approved Project Impact – Less than Significant

Ministerial and discretionary development at the Rezone Sites would adhere to an engineering and policy review that would ensure consistency with applicable policies related to transit, roadway, bicycle, and pedestrian facilities. Therefore, the PEIR concluded that the Previously Proposed Project would not conflict with a plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

Proposed Project Impact – Less than Significant

The Proposed Project would construct an internal street off Summit Avenue and improve the frontage of Summit Avenue adjacent to the Project site with sidewalks and roadway pavement. These improvements will be constructed per the City's street standards consistent with the General Plan Circulation Element and would improve bicycle and pedestrian travel. As such, the Project would not conflict with a program, plan, ordinance, or policy pertaining to circulation. Impacts would be less than significant. There are no new or more severe recreation resource impacts that were not previously evaluated in the Final PEIR.

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

Previously Approved Project Impact – Significant and Unavoidable

With the implementation of the Rezone Sites, including the buildout of the City's General Plan land use and transportation network, the average resident VMT per capita of the City would be reduced to 18.7 (from 20.5 under base year). While the Project would result in a reduction in VMT per capita, which would move the City in the direction of reducing VMT Citywide, the 18.7 VMT per capita represents 91.2 percent of the base year citywide average. As a result, the VMT per capita associated with the Project would be greater than 85 percent of the citywide average and would exceed the VMT threshold, which would be inconsistent with CEQA Guidelines §15064.3, subdivision (b). To have a less than significant VMT impact, a project must demonstrate it can achieve a VMT per capita of 85 percent or less than the citywide average. Therefore, the following mitigation measure was required in the PEIR:

PEIR MM-TRA-1: *The City shall require implementation of applicable Mobility Element Policies that would support VMT reductions for individual projects. Specifically, the City shall require that future projects are compliant with Mobility Element Policies 9.1 through 9.5, which encourage the use of Transportation Demand Management (TDM) strategies, such as ride sharing programs, flexible work schedule programs, and incentives for employees to use transit. Additionally, alternative transportation modes, such as walking, cycling and*

public transit are encouraged to reduce peak hour vehicular trips, save energy, and improve air quality. Sample TDM measures that may be applied at the project-level are provided below:

- Increase mixed-use development
- Increase transit accessibility
- Provide pedestrian network improvement along project frontage
- Provide bicycle network improvement along project frontage
- Provide bicycle parking and bike lockers
- Implement subsidized or discounted transit passes
- Provide rider-sharing programs
- Implement commute trip reduction marketing
- Implement school pool program
- Implement bike-sharing or micro mobility program
- Provide local shuttle to connect visitors to different attractions throughout the City

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

While **PEIR MM-TRA-1** would minimize VMT impacts associated with future development at the Rezone Sites, impacts would not be fully mitigated. Therefore, impacts associated with VMT would remain significant and unavoidable.

Proposed Project Impact – Less than Significant

A Vehicle Miles Traveled (VMT)/Trip Generation Report was prepared for the Proposed Project which is based on the City of Santee VMT Analysis Guidelines, April 13, 2022.⁸ The City's guidelines outline screening criteria and requirements for VMT assessment for small land use projects. The Guidelines indicate that projects consistent with the general plan and are anticipated to generate less than 1,000 daily trips are not required to complete a VMT assessment. The City's guidelines rely upon the number of vehicle trips calculated using SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region or ITE trip generation rates, with any alternative modes/location-based adjustments applied.

Based on the SANDAG guidelines, the Proposed Project will generate 336 daily trips (8 trips per dwelling unit x 42 = 336). Therefore, the Proposed Project can be presumed to be screened out from a VMT analysis. Impacts would be less than significant.

8 City of Santee VMT Analysis Guidelines, <https://www.cityofsanteeca.gov/home/showpublisheddocument/22091/63786233631367>

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

Previously Approved Project Impact – Less than Significant

The Previously Approved Project does not propose any changes to the existing roadway network. Future site-specific development would be designed consistent with established roadway design standards. Therefore, the Previously Approved Project would not substantially increase hazards, and impacts would be less than significant.

Proposed Project Impact – Less than Significant

The Proposed Project site and transportation design were reviewed by the City's Engineering Department, County Fire, and Sheriff's Departments to ensure that the project design does not contain hazardous geometric design features and that adequate access is provided for emergency vehicles. Impacts would be less than significant. There are no new or more severe transportation safety impacts that were not previously evaluated in the EIR.

d) Would the Project result in inadequate emergency access?

Previously Approved Project Impact – Less than Significant

The Previously Approved Project did not propose any changes to the existing roadway network. Access for future site-specific development to the existing roadway network would be configured in a manner consistent with established roadway design standards, allowing emergency access. The City would continue to implement the Santee Emergency Operations Plan to ensure adequate emergency access within the City. Therefore, the prior project would not result in inadequate emergency access, and impacts would be less than significant.

Proposed Project Impact – Less than Significant

Summit Avenue currently provides emergency access to the Proposed Project site. The Project will improve Summit Avenue along the site's frontage and construct a new street off Summit Avenue, which will enhance emergency access. The impacts would be less than significant. There are no new or more severe emergency access impacts that were not previously evaluated in the EIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Transportation are expected because the Proposed Project would construct street improvements per the City's street standards consistent with the General Plan Circulation Element, which would improve bicycle and pedestrian travel. Additionally, the Proposed Project is presumed to be less than significant because it generates 346 daily vehicle trips, which is less than the 1,000 daily trips required to complete a VMT assessment. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.

2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.17 Utilities and Service Systems

This section corresponds with the Previous Approved PEIR Section 4.14, *Utilities and Service Systems*.

1. Section 15164 Analysis

- a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**
-

Previously Approved Project Impact – Less than Significant with Mitigation Incorporated

The Rezone Sites are located within existing developed areas with access to utility infrastructure, and no major upgrades or expansions to Citywide infrastructure are anticipated to serve the Rezone Site's water, wastewater, storm water, or other utility needs. Although it is anticipated that future projects will require localized utility extensions or improvements, any localized connections will be evaluated as part of each site-specific development proposal. All projects, whether discretionary or ministerial, would be reviewed for conformance with local regulations and adherence to General Plan policies; however, physical impacts associated with localized utility infrastructure improvements and relocations associated with the future development of the Rezone Sites are not known at this program level. Therefore, impacts associated with utility improvements would be potentially significant, the following mitigation measure is required:

PEIR MM-UTIL-1: See MM-VIS-1, MM-AQ-1, MM-BIO-1 through MM-BIO-6, MM-CUL-1 through MM-CUL-3, MM-GEO-1, MM-GHG-1 and MM-GHG-2, MM-HAZ-1, MM-NOS-1 through MM-NOS-3, and MM-TRA-1.

Proposed Project Impact – Less than Significant with Mitigation Incorporated

The Proposed Project will connect to the existing infrastructure (e.g., sewer, water, storm drain, electricity, gas, and telecommunication facilities) adjacent to the site. No extensions beyond the site boundaries will be required. The physical impacts to the environment as a result of relocating or constructing new improvements are mitigated through compliance **PEIR MM-UTL-1** above. Impacts would be less than significant. There are no new or more severe utility service impacts that were not previously evaluated in the Final PEIR.

- b) Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**
-

Previously Approved Project Impact – Less than Significant

The increase in population associated with the Previously Approved Project would be consistent with the anticipated population increase analyzed in the Padre Dam Municipal Water District (PDMWD) Urban Water Management Plan (UWMP). Water supplies are projected to exceed the

needs of the PDMWD service area and would adequately cover the demands of the project.⁹ Specific projected demands related to normal, dry, and multiple dry years are discussed in the PDMWD UWMP (2020). With continued conservation, the use of recycled water, and the addition of added supply with the upcoming AWP Project, supplies are projected to meet demands through the year 2045 under an average year, single-dry year, and five-consecutive-year drought conditions. Impacts would be less than significant.

Proposed Project Impact – Less than Significant

The increase in population associated with Rezone Site 1 would be consistent with the anticipated population increase analyzed in the PDMWD UWMP. Water supplies are projected to exceed the needs of the PDMWD service area and would adequately cover the demands of the Proposed Project. With continued conservation, the use of recycled water, and the addition of added supply with the upcoming Advanced Water Purification (AWP) Project, supplies are projected to meet demands through the year 2045 under an average year, single-dry year, and for five-consecutive-year drought conditions. Impacts would be less than significant. There are no new or more severe impacts that were not previously evaluated in the EIR.

c) Would the Project result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Previously Approved Project Impact – Less than Significant

Water use within the PDMWD service area is projected to be 12,442 acre-feet per year (AFY) in 2025, increasing to 15,944 AFY in 2045. Residential demands account for 7,438 AFY (or 60 percent) of the total projected 2025 demand and 10,070 AFY (or 63 percent) of the total projected 2045 demand. The estimate is based on SANDAG demographic estimates included in the PDWMD UWMP (PDMWD 2020), which included the anticipated increase in population from 92,434 in 2020 to 117,701 by the year 2045. The Project would add 1,219 multifamily housing units compared to what would be allowed under the City's existing General Plan/Zoning. The increase in population associated with the Project would be consistent with the anticipated population increase analyzed in the PDMWD UWMP. Water supplies are projected to exceed the needs of the PDMWD service area and would adequately cover the demands of the Project. Specific projected demands related to normal, dry, and multiple dry years are discussed in the PDMWD UWMP. With continued conservation, the use of recycled water, and the addition of added supply with the upcoming AWP Project, supplies are projected to meet demands through the year 2045 under an average year, single-dry year, and five-consecutive-year drought conditions. Impacts would be less than significant.

Proposed Project Impact – Less than Significant

As noted above, the Previously Approved Project was estimated to add 1,219 multifamily housing units compared to what would be allowed under the City's existing General Plan/Zoning. The

⁹ City of Santee City Council Resolution No. 125-2022, p. 70, <https://www.cityofsanteeca.gov/home/showpublisheddocument/22754/638007574476570000>.

increase in demand for wastewater treatment was found to be within the capacity of the wastewater treatment system. The Proposed Project represents 2.15 % of the projected increase analyzed in the Previously Approved Project. As such, the Proposed Project would not result in exceeding the capacity of the wastewater treatment system. Impacts would be less than significant. There are no new or more severe impacts that were not previously evaluated in the EIR.

d) Would the Project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

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

Previously Approved Project Impact – Less than Significant

Future development at the Rezone Sites is located within existing developed areas with access to solid waste disposal services. No development is proposed as part of the project. Solid waste requirements associated with the future development of the Rezone Sites would be evaluated upon submittal of project-specific development plans. All future projects, whether discretionary or ministerial, would be reviewed for conformance with state regulations and adherence to General Plan policies. Therefore, through regulatory conformance, impacts associated with solid waste disposal and capacity would be less than significant.

d) – e) Proposed Project Impact – Less than Significant

The projected annual waste amount generated by the Proposed Project would be 36.8 tons annually (Appendix B). According to the San Diego County Integrated Waste Management Plan (IWMP) 5-Year Review Report, (2022), systemwide, the County has 107,005,301 tons of remaining landfill capacity that extends through 2059. Additionally, in 2010 the East Otay Mesa Landfill was approved through a voter initiative; the capacity for this landfill is not included in the IWMP calculations. The County's overall success at meeting the various waste reduction and recycling targets has extended the lifespan of many of the County facilities beyond what was originally projected.

The Project would be required to comply with the City's solid waste reduction programs, including the Construction and Demolition Debris Recycling Ordinance, which includes the preparation and implementation of a Debris Management Plan that demonstrates that a minimum of 65 percent of construction debris will be recycled. Likewise, the City's programs have been designed to be compatible with and achieve the goals of the California Integrated Solid Waste Management Act. Impacts would be less than significant. There are no new or more severe solid waste impacts that were not previously evaluated in the EIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Utilities and Service Systems are less than because all utility and service systems (e.g. electricity, natural gas, water, sewage treatment,

stormwater facilities, solid waste disposal facilities) are available to serve the Proposed Project. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

19.18 Wildfire

This section corresponds with the Previous Approved PEIR Section 4,15, *Wildfire*.

1. Section 15164 Analysis

a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Previously Approved Project Impact – Less than Significant

The Previously Approved Project does not propose any changes in the City's existing circulation network, and no land uses are proposed that would impair the implementation of or physically interfere with the City's emergency response plan, evacuation routes, or conflict with any of the Multi-Jurisdictional Hazard Mitigation Plan (MHMP) specific hazard mitigation goals, objectives, and related actions. Therefore, the buildout of the Rezone Sites would not conflict with emergency response, and impacts would be less than significant.

Proposed Project Impact – Less than Significant

The Proposed Project is located within the jurisdiction of the City of Santee Fire Department, which provides fire suppression and emergency medical response to the area. Access to the Proposed Project site is made from several main thoroughfares including Magnolia Avenue. Access roads are currently paved but will be improved with sidewalks, curbs, and gutters according to Santee Engineering and Public Services requirements. These improvements will reduce traffic congestion and response time to the Project area, especially the area north of the Calvary Chapel of Santee Church, which is west of the Project site across Summit Avenue, where the access road condition is not as well maintained. Therefore, the Proposed Project will have a less than significant impact on emergency access once the road improvements have been completed. There are no new or more emergency response impacts that were not previously evaluated in the EIR.

a) Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

b) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Previously Approved Project Impact – Less than Significant

Future development located within the Very High Fire Hazard Severity Zone (VHFHSZ) would be required to adhere to California Fire Code Title 19, Division 1, Section 3.07(b), requiring a minimum 30-foot brush clearance around structures for fire safety. Further codified by the City in Municipal Code Chapter 11.18, all new developments, subdivisions, or tracts that are planned in Fire Hazard Severity Zones and/or WUIA shall have a minimum of 100 horizontal feet of "fuel-modified" defensible space between structures and wildland areas. City General Plan policies 4.2 through 4.13 guide the minimization of fire hazards including ensuring adequate response times, setting

standards for emergency access, structural standards, and other planning design measures required to be considered in all new developments. Additionally, future discretionary projects would require review by the Building Official/Fire Marshal. Adherence to Fire Code regulations and General Plan policies would ensure impacts associated with risk of wildland fires would be less than significant. Therefore, the impacts of pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be less than significant.

Proposed Project Impact – Less than Significant

The Proposed Project consists of the development of 42 three-story condominium residences. Currently, structures on the project site include a single home, sheds, carports, and related farming structures. These structures will be removed during construction. Wildland fuels on the northeastern corner of the property have been treated in the past by mowing or disking. Little native wildland fuels exist on the site according to the biological report (Appendix C).

Northern Boundary: The northern boundary is dominated by scattered residential properties with increasing slopes and drainages to the north into the Sycamore Canyon drainage basin. These developed properties have scattered disturbed wildland fuel beds. Some conversion of native fuels has occurred, leaving non-native grasses and shrubs. Beyond the immediate boundary, the slopes are covered with mature stands of SCAL18 fuels (coastal sage scrub) ranging from 3 to 5 feet tall. Seasonal, dry washes and creek beds dominate the bottom of the canyon floor, with increasing slopes leading to the Sycamore Canyon Preserve and Clark Canyon. Vegetation consists of shrubs such as sagebrush, buckwheat, lemonade berry, laurel sumac, and chamise; scattered cacti are commonly found in the SCAL18 fuel model. Annual flowers appear after winter and spring rains. Fuel types change rapidly along ascending slopes where shrubs, including 3- to 4-foot stands of chamise, are found. Scattered oak and willow trees are found along the seasonal creek beds in higher elevations

Eastern Boundary: The eastern boundary abuts increasingly steeper west-facing slopes. These slopes are covered with continuous SCAL18 (coastal sage scrub) wildland fuels. The mature fuels are 3 to 4 feet in height with some taller pockets. Large boulders cover the slope with small pockets of annual grass under the SCAL18 canopy.

Southern Boundary: The residential structure and sheds are the main features along the southern boundary. Very sparse, disturbed vegetation exists along the boundary. Construction will remove all the current structures, debris, and trees that cover the majority of the site.

Western Boundary: The western boundary is Summit Avenue, a poorly maintained section of two-lane road. The asphalt surface has failed, limiting the ability of fire apparatus to make access to structures north of the site. Summit Avenue provides a buffer to off-site wildland fuels to the west. A row of planted pepper trees will be removed during construction. A 50-foot-wide buffer between the street and the westernmost condominium will be created to reduce the wildland fire threat.

In summary, any wind- or topography-driven wildfire burning under strong wind conditions, with winds varying from the northeast or southwest, will create a moderate to high wildland fire hazard for Summit Avenue. The wildland fuels on the northern and eastern slopes will be out of full alignment with the strong north wind pushing a fire downhill into the area at a lesser rate of speed than a fire moving upslope with the same wind.

A typical day with a northwesterly or southwesterly wind pattern would be in full alignment and push a fire up the west-facing slopes at a much more rapid rate, but the fire activity would be moving away from the site, a significant risk reduction. A wildfire burning from west of Summit Avenue could have a significant impact on the Project site. However, the topography is flat, providing little increase in the rate of spread. The greatest threat would be from embers crossing the street and impacting the site; however, the Project is protected from any direct wildland fire flame impingement threat by existing and planned fuel modification and the construction of fire-resistant structures as described below.¹⁰

Project Design Features (PDF)

In fulfillment of General Plan Safety Element Policy 4.9: "All proposed development shall satisfy the minimum structural fire protection standards contained in the adopted edition of the Uniform Fire and Building Codes; however, where deemed appropriate the City shall enhance the minimum standards to provide optimum protection" the following PDFs will be included in the **Conditions of Approval**.

PDF-FIRE-1: Fuel Modification Zones

- Structures will be covered by 100-foot fuel treatment zones or within overlapping fuel treatment zones with Zone 1 from 0 feet to 50 feet around each structure with the first 5 feet a noncombustible zone, and Zone 2 from 50 feet to 100 feet from all structures (see Figure 10, Fuel Treatment Zones).

PDF-FIRE-2: Site Preparation

- Flammable vegetation removal shall be completed before commencing building construction. During construction, at least 50 feet of clearance around the structures shall be kept free of all flammable vegetation as an interim fuel modification zone during construction of structures. Debris and trimmings produced by thinning and pruning shall be removed from the site.

PDF-FIRE-3: Building Construction

- Designated structures will have two-hour rated exterior walls, attic and garage sprinklers, and automatic timers on garage doors where 100 feet of defensible space is not available.
- All structures built within the Project shall be designed and constructed with ignition-resistant construction standards and design features per the current California Fire Code and California Building Code and amendments as adopted by the City of Santee.
- All new combustible building materials, decks, balconies, patios, covers, gazebos, and fences will be permanently prohibited in Zones 1 and 2. These structures may be allowed if constructed with Fire Resistive materials per the Santee Fire Department. These materials

¹⁰ Fire Protection Plan, Appendix J.

require the Santee Fire Marshall's approval before installation. The project developers are not restricted from having concrete patios, or concrete walkways within these zones.

- Automatic garage door openers are required to be equipped with a backup battery following state regulations. Sweeps and gaskets are required on garage doors and door openings.
- All buildings shall be provided with metal mesh or similar non-combustible bug screens over the operable window opening to replace traditional vinyl bug screens to prevent embers from entering the structures during high wind conditions when windows may be inadvertently left open.
- Building 7 in the southeast corner of the project (see Figure 10, Fuel Treatment Zones) shall have the following requirements to mitigate the lack of 100 feet of fuel modification: Exterior walls conform to a 2-hour construction assembly as shown in the article "Exterior Wall Fire Resistance: Ratings, Assemblies & Components" and the Gypsum Association Design Manual;¹¹ Automatic garage door openers shall include a time-out feature that will automatically close the garage door after a maximum of 10 minutes of inactivity; Attic and garage fire sprinklers.

PDF-FIRE-4: Requirements for Inclusion in the CC&Rs

1. Each unit owner is responsible for all fuel treatment measures within their unit.
2. No combustible materials shall be stored beneath any projection, deck, or overhang exposed to wildland fuels.
3. All property owners shall be members of the Homeowners Association (HOA) and shall financially support the annual maintenance of all required Fuel Modification Areas within the common areas of the development.
4. All roadside fuel treatment within the development is the maintenance responsibility of the HOA.
5. The HOA shall be responsible for keeping the roof areas including gutters and downspouts free of combustible debris including leaves, limbs, and similar materials.
6. The HOA shall have the authority to enforce required fuel treatment measures on all units and restrictions on combustible structures.
7. Trash dumping or disposal of yard trimmings is prohibited in fuel treatment zones.
8. The HOA Board shall be responsible to the Santee Fire Department for the completion of all required ongoing Fuel Modification Treatments. This includes the perpetual management of invasive (exotic) and prohibited plant species in any fuel treatment zone within the development.
9. All individual yard landscaping plans, including additional structures, shall be approved by the HOA Board and shall comply with the Fire Protection Plan. Any disputes relating

¹¹ Ibid.

to the HOA Board approval of individual yard landscaping, regarding the interpretation of the Fire Protection Plan, shall be decided by the Santee Fire Marshal. The Fire Marshal's decision shall be final and binding on the unit owner.

10. Upon the sale of a unit to a new owner, a copy of the Fire Protection Plan shall be provided as a condition of the sale.
11. The Santee Fire Department (SFD) shall be designated as a third-party beneficiary of a homeowners' association's duty to perform "Fire Prevention Maintenance" (as defined below) for all portions of the Association Property (or Common Area) that constitute Fuel Modification Zones maintained by the HOA, and of any owner's duty to comply with any Fuel Modification Zone restrictions applicable to their Unit. Additionally, the SFD shall have the right, but not the obligation, to enforce the homeowners' association's duty to perform such Fire Prevention Maintenance and to enforce compliance by any owner with any Fuel Modification Zone restrictions applicable to their Unit. In furtherance of such right, the SFD shall be entitled to recover its costs of suit, including its actual attorney's fees, if it prevails in an enforcement action against the HOA and/or an individual lot owner. As used herein, "Fire Prevention Maintenance" shall mean the following:
 - a) All portions of the Association Property (or Common Area) that constitute Fuel Modification Zones or designated interior/manufactured slopes shall be regularly maintained by the homeowners association on a year-round basis per the Fire Protection Plan (Appendix J) on file with the property manager for the development.
 - b) The irrigation system for Fuel Modification Zones or designated common areas shall be kept in good condition and in proper working order at all times.

These PDFs will be incorporated by reference into the final project Conditions of Approval. Impacts would be less than significant. There are no new or more severe wildfire impacts that were not previously evaluated in the Final PEIR.

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

Previously Approved Project Impact – Less than Significant

Development of the Rezone Sites would be required to comply with applicable regulations and policies related to flooding, drainage patterns, and landslides. Therefore, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and impacts would be less than significant.

Proposed Project Impact – Less than Significant

The Proposed Project would comply with applicable regulations detailed in Section 19.6, Geology and Soils, and Section 19.9, Hydrology and Water Quality. Impacts would be less than significant. There are no new or more severe wildfire impacts that were not previously evaluated in the EIR.

2. Findings

As demonstrated in the analysis above, impacts relating to Wildfire are less than because any wind- or topography-driven wildfire burning under strong wind conditions, with winds varying from the northeast or southwest, will create a moderate to high wildland fire hazard for Summit Avenue. The wildland fuels on the northern and eastern slopes will be out of full alignment with the strong north wind pushing a fire downhill into the area at a lesser rate of speed than a fire moving upslope with the same wind.

A wildfire burning from west of Summit Avenue could have a significant impact on the Project site. However, the topography is flat, providing little increase in the rate of spread. The greatest threat would be from embers crossing the street and impacting the site; however, the Project is protected from any direct wildland fire flame impingement threat by existing and planned fuel modification and the construction of fire-resistant structures as described. Therefore, the following findings can be made.

Section 15183

1. No peculiar impacts to the Proposed Project or its site have been identified.
2. There are no impacts that were not analyzed as significant effects in the PEIR, with which the Proposed Project is consistent.
3. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the PEIR.
4. No substantial new information has been identified which results in an impact which is more severe than anticipated by the PEIR.
5. The Proposed Project would comply with the mitigation measure contained within the PEIR, which is designed to reduce any potential Proposed Project-specific impact to less than significant, and no further mitigation measures are required.

Sections 15162/15164

1. No substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the negative declaration was adopted.

Figure 10: Fuel Treatment Zones

