Final Environmental Impact Report

Palisade Santee Commerce Center Project

State Clearinghouse No. 2023090144

AUGUST 2025

Prepared for:

CITY OF SANTEE
PLANNING & BUILDING DEPARTMENT
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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AASHTO	American Association of State Highway Transportation Officials
ACM	asbestos-containing material
ACWM	asbestos-containing waste material
ADT	Average Daily Traffic
AERMOD	American Meteorological Society/EPA Regulatory Model
AFY	acre-feet per year
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
ANSI	American National Standards Institute
APN	Assessor's Parcel Number
AQMP	Air Quality Monitoring Quality Management Plan
BLM	Bureau of Land Management
BMP	best management practice
BTR	Biological Technical Report
BUG	backlight, up light, and glare
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAP	climate action plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAS	California Approved Samplers
CAT	Climate Action Team
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Code
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERT	Community Emergency Response Team
CESA	California Endangered Species Act
CFC	California Fire Code
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CGP	Construction General Permit
CH_4	methane
CHRIS	California Historical Resources Information System

Acronym/Abbreviation	Definition
CIWM	California Integrated Waste Management
CIWMB	California Integrated Waste Management Board
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CTR	Commute Trip Reduction
CUP	Conditional Use Permit
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DEH	San Diego County Department of Environmental Health
DER	Distributed Energy Resources
DIF	Development Impact Fee
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
EDR	Environmental Data Resources Inc.
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
EO	Executive Order
EOP	Emergency Operations Plan
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
EV	electric vehicle
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FESA	federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FICON	Federal Interagency Committee on Noise
FPP	Fire Protection Plan
FRA	Federal Responsibility Area
FTA	Federal Transit Administration
GHG	greenhouse gas
GUHSD	Grossmont Union High School District
GWP	global warming potential
HABS	Historic American Buildings Survey
HAP	hazardous air pollutant
HARP	Hotspots Analysis Reporting Program
HCFC	hydrochlorofluorocarbon
HCP	Habitat Conservation Plan

Acronym/Abbreviation	Definition
HFC	hydrofluorocarbon
HHDT	heavy-heavy duty truck
HMD	Hazardous Materials Division
HRA	health risk assessment
HUC	hydrologic unit code
HVAC	heating, ventilation, and air conditioning
ICC	International Code Council
IEPR	Integrated Energy Policy Report
IESNA	Illuminating Engineering Society of North American
IFC	International Fire Code
IOS	Industrial Outdoor Storage
IPCC	Intergovernmental Panel on Climate Change
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institute of Transportation Engineers
ITS	Intelligent Transportation System
LBP	lead-based paint
LEED	Leadership in Energy and Environmental Design
LHDT	light-heavy duty truck
LID	Low Impact Development
LOS	level of service
LRA	Local Responsibility Area
LTF	Local Task Force
LZ	lighting zone
MHDT	medium-heavy duty truck
MHPA	Multi-Habitat Planning Area
MLD	Most Likely Descendant
MMT	million metric tons
mph	miles per hour
MPO	metropolitan planning organization
MSCP	Multiple Species Conservation Program
MT	metric ton
MTS	Metropolitan Transit System
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NF_3	nitrogen trifluoride
NFHL	National Flood Hazard Layer
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System

Acronym/Abbreviation	Definition
NRHP	National Register of Historic Places
NTU	Nephelometric Turbidity Unit
O_3	ozone
OBCF	octave-band center frequency
OEHHA	Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCE	passenger car equivalence
PDF	Project Design Feature
PDMWD	Padre Dam Municipal Water District
PDP	Priority Development Project
PFC	perfluorocarbon
PLF	Point Loma Facility
PM	particulate matter
PPV	peak particle velocity
PRC	Public Resources Code
PV	photovoltaic
RAQS	Regional Air Quality Strategy
RAS	Regional Arterial System
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RFS	Renewable Fuel Standard
ROW	right-of-way
RPS	Renewables Portfolio Standard
RTCIP	Regional Transportation Congestion Improvement Plan
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAFE-1	Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Reauthorization Act
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCSD	San Diego County Sheriff's Department
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas & Electric

Acronym/Abbreviation	Definition
SDHC	San Diego History Center
SDNHM	San Diego Natural History Museum
SEMS	Statewide Emergency Management System
SF_6	sulfur hexafluoride
SFD	Santee Fire Department
SGMA	Sustainable Groundwater Management Act
SIAM	Structure Ignition Assessment Model
SIP	state implementation plan
SLEMSA	Santee-Lakeside Emergency Medical Services Authority
SLF	Sacred Lands File
SLM	sound level meter
SMC	Santee Municipal Code
SPL	sound pressure level
SRA	State Responsibility Area
SSD	Santee School District
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TAZ	traffic analysis zone
TCR	Tribal Cultural Resource
TDM	Transportation Demand Management
TDS	total dissolved solids
TIS	Transportation Impact Study
TMDL	total maximum daily load
TSS	total suspended solids
TWLTL	two-way-left-turn lane
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VdB	vibration decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	waste discharge requirement
WEAT	worker environmental awareness training
WMA	Watershed Management Area
WRF	Water Recycling Facility
ZEV	zero-emission vehicle

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Introduction to the Final EIR

In accordance with Section 15088 of the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines), the City of Santee (City), as the Lead Agency under the California Environmental Quality Act (CEQA), has evaluated the comments received on the Draft Environmental Impact Report (EIR) (State Clearinghouse [SCH] No. 2023090144) for the proposed Palisade Santee Commerce Center Project (Project) and has prepared this Final EIR with written responses to the comments. This Final EIR has been prepared in accordance with CEQA and represents the independent judgment of the City as the Lead Agency.

According to State CEQA Guidelines Section 15132, the Final EIR shall consist of:

a) The draft EIR or a revision of the draft.
b) Comments and recommendations received on the draft EIR either verbatim or in summary.
c) A list of persons, organizations, and public agencies commenting on the draft EIR.
d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
e) Any other information added by the Lead Agency.

The purpose of the Final EIR is to respond to all written comments received by the City regarding the environmental information and analyses contained in the Draft EIR. Additionally, any clarifications or revisions to the Draft EIR generated from responses to comments are stated in the Final EIR. In this Final EIR, the Draft EIR has been modified per the clarifications and revisions in the responses and is presented in the Revisions to the Draft EIR chapter.

In addition to the Final EIR (including supporting technical appendices), the City Council will also consider the adoption of a Mitigation Monitoring and Reporting Plan (MMRP), a Findings of Fact and Statement of Overriding Considerations document, staff reports, and resolutions prior to making a decision on the project.

Content and Format

This Final EIR includes three chapters as well as a reprinting of the Draft EIR reflecting text changes made during the Final EIR process. This introductory chapter is the first chapter in the Final EIR. The second chapter of this Final EIR includes the responses to all comments received during the public review period for the Draft EIR. The Responses to Comments chapter also includes a copy of all comment letters received within the public review period. The responses are annotated to correspond to each individual comment within each comment letter. The third chapter of this Final EIR shows the revisions to the Draft EIR that have been made to the text of the Draft EIR, with only the revised text included. Following these three chapters, this Final EIR includes a reprinting of the complete Draft EIR with text changes made consistent with the third chapter of this Final EIR.

Public Review of the Draft EIR

As required by Section 15087 of the State CEQA Guidelines, a Notice of Completion (NOC) and a Notice of Availability (NOA) of the Draft EIR for the Project were filed with the State Clearinghouse on April 21, 2025, and the NOA of the Draft EIR was also filed with the San Diego County Clerk. The Draft EIR was circulated for public review for a minimum of 45 days, from April 21, 2025 to June 2, 2025. The NOA, NOC, and the Draft EIR and supporting

technical appendices were also posted on the Governor's Office of Land Use & Climate Innovation's CEQANet Web Portal, and the NOA was sent to responsible agencies and other interested agencies and parties on or about April 21, 2025. Copies of the Draft EIR were also made available for public review at the City Department of Development Services (Building 4), the City's Clerk's Office (Building 3), the Santee County Library, and on the City's website.

Point of Contact

The Lead Agency for the proposed Project is the City. Any questions or comments regarding the preparation of this document, its assumptions, or its conclusions, should be referred to:

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Responses to Comments

During the public review period (April 21, 2025, through June 4, 2025) for the Draft Environmental Impact Report (EIR) for the Palisade Santee Commerce Center Project (proposed project), the City of Santee (City) received 25 comment letters. An additional comment letter was received following the close of the public comment period. Two of the comment letters received, including the late comment letter, were later withdrawn by the commenters. The thematic responses, comment letters, and the City's responses to them are included in this chapter. The responses to comments are based on the California Environmental Quality Act (CEQA) Guidelines, Section 15088(c), Evaluation of and Response to Comments, which states the following:

> The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment.

All comments received on the Draft EIR will, as part of the Final EIR, be provided to the City Council for their consideration during the hearing process.

Comments Received

Table RTC-1, Summary of Public Comments on the Draft EIR, lists the comment letters received from agencies, organizations, and individuals, including the two letters of withdrawal. Comments and responses to comments have been assigned a letter (S [State Agencies], O [Organizations], I [Individuals], and W [Withdrawals]). A copy of each comment letter with its corresponding responses is provided in this chapter.

As the CEQA Lead Agency and pursuant to California Public Resources Code, Section 21092.5, and CEQA Guidelines, Section 15088(b), the City provided the public agency that commented on the Draft EIR with a copy of the City's response to those comments at least 10 days before certifying the EIR.

In accordance with Section 15132 of the State CEQA Guidelines, the agencies, organizations, and individuals that submitted comments regarding the Draft EIR within the public review period are listed below:

Table RTC-1. Summary of Public Comments on the Draft EIR

No.	Commenter	Date
State Agencies		
S1	California Department of Transportation (Caltrans)	6/4/2025
Organizations		
O1	Tom Hissong, San Diego Parrot Head Club	5/29/2025

Table RTC-1. Summary of Public Comments on the Draft EIR

No.	Commenter	Date
O2	Hillcreek Neighbors	6/4/2025
O3	San Diego Archaeological Society	6/4/2025
Individuals		
I1	Philip and Linda Decker	5/22/2025
I2	John Ryan	5/29/2025
I3	Vicki Krismer	5/23/2025
I4	Tri Dang	5/29/2025
I5	Stephanie Bowers	5/29/2025
I6	Dominic Daoust	5/29/2025
I7	Jason Lewis	5/30/2025
I8	Sara Hertweck	5/30/2025
I9	Torri Rodriguez	5/31/2025
I10	Dennis L. Canfield	5/31/2025
I11	Alishia Prescott	6/1/2025
I12	Kimberly Klingensmith	6/2/2025
I13	Mike Aiken	6/2/2025
I14	Jim Preihs	6/2/2025
I15	Carl and Mary Costantino	6/2/2025
I16	Torri Rodriguez	6/3/2025
I17	Chris Schneider	6/3/2025
I18	Evan McDonald	6/3/2025
I19	Beverly Pendarvis	6/4/2025
I20	Andrea Roth	6/4/2025
I21	Tracy Sundlun	6/4/2025
Withdrawn		
W1	Advocates for the Environment	6/19/2025
W2	Golden State Environmental Justice Alliance	6/20/2025

The comment letters have been divided into individual comments, with each comment containing a single theme, issue, or concern. Each comment is bracketed and assigned a letter and number. Comment letters have been reduced to fit on the left side of a single page. The corresponding City response and letter-number combination is provided on the right side of the page.

In the responses to comments, revisions to the Draft EIR are indicated as underlined text (e.g., <u>underlined</u> text) and deletions as strikethrough text (e.g., ~~strikethrough~~ text). In Chapter 3, text changes resulting from the comments received are also shown as underlined and/or strikethrough text. Please note that the revisions do not affect the conclusions of the Draft EIR.

Thematic Responses

Two topics were frequently raised in the comment letters received during the public review period: transportation and noise. Thematic responses are provided below to address these topics.

Thematic Response 1: Transportation

Revisions to PDF-TRA-1 and MM-TRA-2

Following the release of the Draft EIR for public review, the City and the Project applicant discussed changes to the Project design features (PDFs), particularly the PDF related to transportation/traffic. Changes to PDF-TRA-1 and mitigation measure MM-TRA-2 were further refined following the receipt of the comment letter from Caltrans (Letter S1). Figure RTC-1 has been included to graphically depict the type, extent, and responsibility of transportation improvements as modified by the text changes to PDF-TRA-1 and MM-TRA-2. The revisions to PDF-TRA-1 and MM-TRA-2 are as follows:

PDF-TRA-1 Multi-modal Intersection Improvements: Prior to the issuance of a building permit, the Project applicant will pay its traffic impact fees to the satisfaction of the City Engineer. Prior to obtaining the Certificate of Occupancy, the Project will construct a new on-site sidewalk to connect the main entrance of the building with the existing sidewalk on N. Woodside Avenue. Prior to the issuance of a building permit, ~~T~~the Project applicant will also fund its fair share in the amount of $476,000 payable to the City to rehabilitate the pavement with a full width and adequate structural section on N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to the eastern most edge of the Project driveway's intersection with N. Woodside Avenue~~, to the satisfaction of the City Engineer~~. The Project applicant will install also approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk near N. Woodside Avenue's intersection with the SR-67. The Project will install "KEEP CLEAR'" pavement markings west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue.

MM-TRA 2 Construction of Sidewalk: The Project will construct a new sidewalk along a portion of N. Woodside Avenue to create a continuous sidewalk along N. Woodside Avenue where it intersects the SR-67. Together, with the sidewalk constructed per PDF-TRA-1, this will be a total of 990 linear feet of new sidewalk. If the applicant, despite commercially reasonable efforts, is unable to obtain the necessary permits to construct the portion of sidewalk located outside of the City of Santee's right-of-way, the applicant will have an additional six months following the issuance of the Certificate of Occupancy to complete that portion. If, at the end of that six-month period, the applicant is still unable to construct the sidewalk due to the continued inability to obtain the required permits, the Project applicant will pay an in-lieu fee in the amount of $50,000 to the City to complete this work.

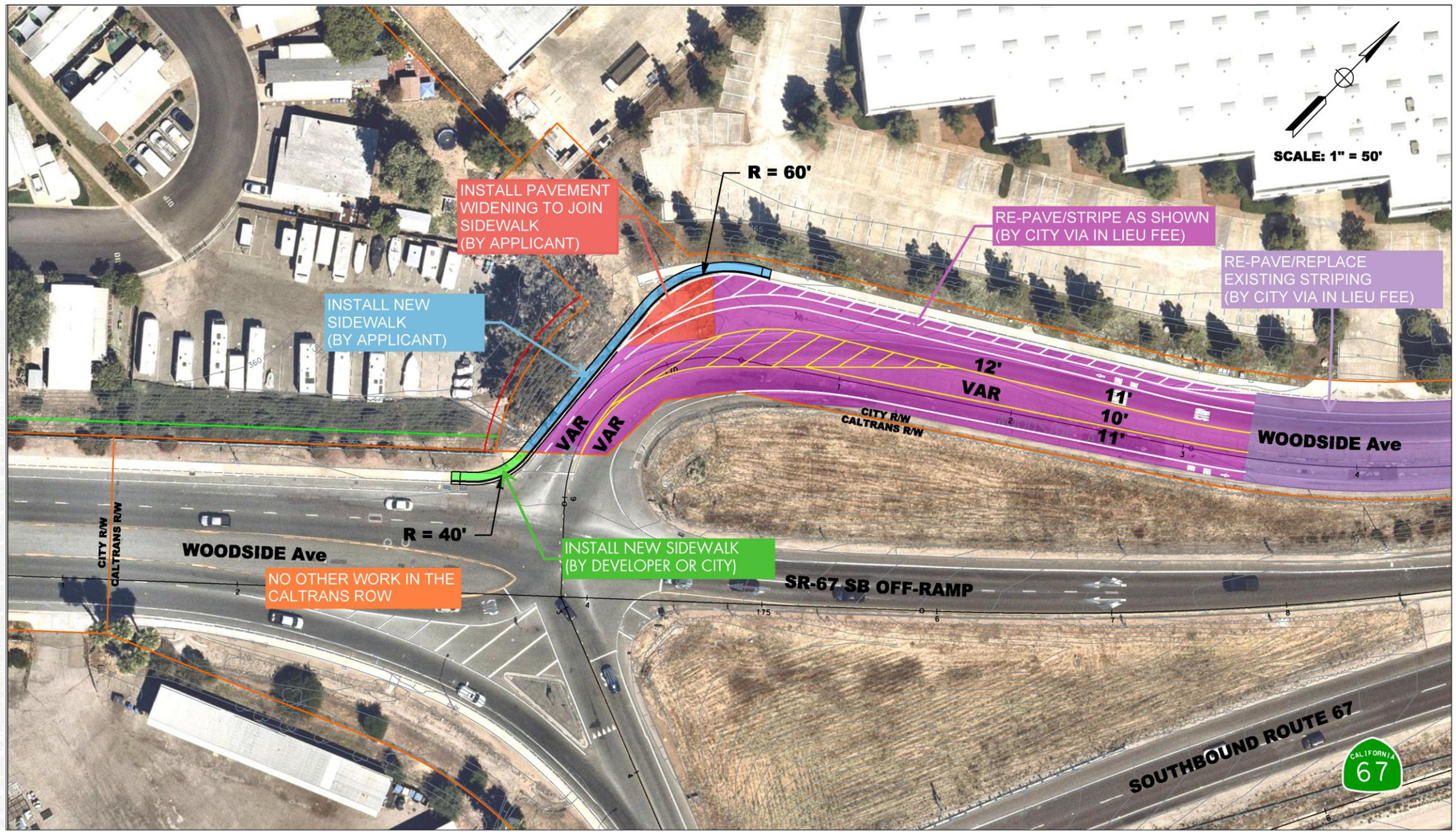
CEQA Guidelines Section 15088.5(a) states the following:

> A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information

> added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:
>
> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
>
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
>
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
>
> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)

Section 15088.05(b) states that "Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." In the present case, the revisions made to PDF-TRA-1 and MM-TRA-2 are not significant revisions because they merely provide additional information for implementation of PDF-TRA-1 and MM-TRA-2. The revisions do not involve changes to the improvements that would be constructed but rather provide options for completion/satisfaction of the improvements. Because the improvements discussed in PDF-TRA-1 and MM-TRA-2 would still be constructed, the information added is not considered to be "significant new information" under CEQA Guidelines Section 15088.5(a). Because the text changes in PDF-TRA-1 and MM-TRA-2 are not significant new information, recirculation of the Draft EIR is not required.

Figure RTC-1 Updated Intersection Improvements



SOURCE: Dokken Engineering 2025

DUDEK

FIGURE RTC-1
Updated Intersection Improvements
Palisades Santee Commerce Center Project

Traffic – LOS vs VMT

Many comments received during the public review period expressed concern about traffic that would be generated by the proposed Project. In the past, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using level of service (LOS). Mitigation for impacts on vehicular delay often involves increasing capacity, such as widening a roadway or the size of an intersection, which in turn encourages more vehicular travel and greater pollutant emissions. Additionally, improvements to increase vehicular capacity can often discourage alternative forms of transportation such as biking and walking.

The state's adoption of Senate Bill (SB) 743, Public Resources Code Section 21099(b)(2), and subsequent adoption of CEQA Guidelines Section 15064.3 provide that traffic delay under an LOS metric is no longer considered a significant environmental impact under CEQA. SB 743 directed that an alternative metric(s) be developed for analyzing transportation impacts in CEQA documents. State law now requires the use of a vehicle miles traveled (VMT) metric for land use development projects, which is intended to promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution, while promoting the development of multimodal transportation system, and providing clean, efficient access to destinations. However, the proposed Project's traffic analysis using the LOS metric was included in the Transportation Impact Study (TIS) (Appendix L of the Draft EIR) for informational purposes and to comply with City requirements.

Since adoption of SB 743, Caltrans has updated its guidelines for Land Development Review (LDR) and adopted the metric of VMT. Per Caltrans *Vehicle Miles Traveled-Focused Transportation Impact Study Guide*, May 20, 2020, LOS analyses or other vehicle operations analyses for land use projects are no longer requested or required by Caltrans. The City of Santee adopted its VMT Analysis Guidelines in April, 2022. The Caltrans guidance supports the shift away from using LOS as a metric of analysis under CEQA, in accordance with implementing Senate Bill 743.

The TIS provides analysis of the proposed Project's potential effects relative to General Plan consistency with LOS policies used by the City over each of the study intersections. Additionally, per City of Santee Mobility Element Policy 2.1, "The City shall encourage an automobile Level of Service "D" on street segments and at intersections throughout the circulation network while also maintaining or improving the effectiveness of the non-automotive components of the circulation system (i.e., pedestrians, bicyclists, and public transit). The City may approve a lower automobile LOS if it finds that the effectiveness of nonautomotive components of the circulation system would be maintained or improved as a result. In other cases, the City shall not approve any development that causes a drop in the level of service at a street segment or an intersection to LOS E or F, after feasible mitigation, without overriding social, economic, or other benefits. For impacts related to CEQA analysis(i.e., VMT analysis) mitigation measures may include Transportation Demand Management recommendations, such as transit facilities, bike facilities, telecommuting, rideshare programs, flex-time, carpool incentives, parking cash-out, complete or partial subsidization of transit passes, etc.

In conclusion, while many comments discuss existing traffic congestion in the area and express concern about worsening traffic with implementation of the Project, traffic delay is not an environmental impact under CEQA. Because traffic delay and congestion are not considered an environmental impact, no mitigation is required.

Traffic Safety and ICE/ISOAP Evaluation

Several comments were received that expressed concern for traffic safety, particularly with the addition of truck trips that would be generated by the proposed Project. Also, the comment letter from Caltrans posed specific questions regarding transportation safety impact review.

The *Traffic Safety Bulletin 20-02-R1: Local Development Intergovernmental Review (LDR) Safety Review Practitioners Guidance*, February 2024, provides instructions to Caltrans personnel who conduct road safety reviews for proposed land use projects and plans affecting the State Highway System (SHS), within the scope of the LDR process (Caltrans 2020). This Guidance establishes the recommended transportation safety impact review process for Caltrans and lead agencies for evaluating proposed land use projects. As required by the LDR Safety Review Guidance for land use plans, the proposed Project's TIS includes queuing analysis for the Caltrans facility in the proposed project's study area (i.e., N. Woodside Avenue/ Woodside Avenue – State Route 67 (SR-67) southbound (SB) Off-Ramp intersection). Under Existing and Existing Plus Project conditions analyzed, the westbound turn movements at the SR-67 off-ramp do not exceed the storage length available and the analysis indicates there are currently no queuing issues that may potentially spill back onto the SR-67 mainline.

The Intersection Safety and Operational Assessment Process (ISOAP) is an update and renaming of Intersection Control Evaluation (ICE) and supersedes Traffic Operations Policy Directive 13-02 and the August 23, 2013 memorandum, *Intersection Control Evaluation (ICE) and Design Guidance*. The process is used by Caltrans to evaluate proposed traffic control and design geometrics for intersections and other access improvements proposed on the State Highway System. As such, ISOAP analysis is beyond the scope of the Draft EIR or the proposed Project's TIS.

SR-67/ Riverford Road Interchange

Multiple comments were received that questioned whether trucks traveling to or from the Project site would utilize the SR-67 interchange at Riverford Road, and some comments questioned the timing of the Caltrans improvements at that interchange. The SR-67/Riverford Road interchange improvements, a transportation project which would consolidate three intersections into two roundabouts on Riverford Road on both sides of SR-67, is proposed approximately one mile north of the proposed Project site. The Project's study area does not include Riverford Road and its intersections with SR-67 because the proposed Project would not add 50 or more peak hour trips to those facilities. However, as shown in the State Route 67 and Riverford Road ICE Report, submitted to Caltrans in 2020, with the construction of proposed roundabouts, the closely spaced intersections of the SR-67 northbound off-ramp/Woodside Avenue, Woodside Avenue/Riverford Road, and SR-67 southbound ramps/Riverford Road would operate at LOS D or better for all movements with no spillback onto SR-67 mainline. Therefore, the SR-67/Riverford Road interchange project will improve LOS and traffic operations in the vicinity of the proposed Project.

The details on the timing of construction of this interchange are not available currently. Therefore, it is unknown if construction of any part of the SR-67/Riverford Road interchange would overlap with the construction of the proposed Project. However, construction of both projects would follow standard procedures for obtaining required encroachment and trip permits from Caltrans and ensure that appropriate traffic control and construction traffic management plans are prepared and implemented along Woodside Avenue.

Roadway Damage

Several comments express concern regarding roadway damage from the increased volume of trucks that would occur with the proposed Project. It should be noted that segments of Woodside Avenue are classified as Prime or Major

Arterial in the City and classified as a Collector in the vicinity of the Project. In the City, Woodside Avenue is an important and designated truck route that connects the industrial areas to SR-52, SR-67 and SR-125. While roadway damage is not an environmental impact under CEQA, this brief response is being provided for informational purposes. The City's Engineering Department is responsible for street maintenance and additional information can be found on the Department's website at https://www.cityofsanteeca.gov/departments/engineering/street-maintenance. The City performs street maintenance and resurfacing based on the recommendations from the most recent Pavement Management Report, which identifies the best and highest use of the annual street maintenance budget based on a condition analysis of all streets within the City. Street resurfacing is funded by three sources: 1) TransNet, the half-cent sales tax administered by SANDAG; 2) Senate Bill (SB) 1, also referred to as Road Maintenance and Maintenance Account (RMRA) gas tax; and, 3) the City's General Fund.

As noted in PDF-TRA-1, the Project applicant will also fund its fair share in the amount of $476,000 payable to the City to rehabilitate the pavement with a full width and adequate structural section on N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to the eastern most edge of the Project driveway's intersection with N. Woodside Avenue. Therefore, the pavement on Woodside Avenue would be improved to sustain increased truck volumes in the vicinity of the Project.

Thematic Response 2: Noise

Multiple comments were received regarding Project noise, with most concerned about operational noise. As discussed in Section 4.10, Noise, of the Draft EIR, a *Noise Technical Report* was prepared by Dudek in May 2024 and included as Appendix K to the Draft EIR. Many of the comments were general, lacking specific concerns regarding the assumptions or calculations in the technical report.

The City of Santee has established target maximum noise levels in the City, categorized by land use. The City's General Plan Noise Element sets limitations on noise levels for receiving properties adjacent to the project site. The City has established a maximum noise level limit of 65 dBA L_{dn} for noise-sensitive land uses, such as the residences along Hillcreek Road, which the noise analyses have shown is not predicted to be exceeded during construction or operation of the Project. The City does not establish maximum operational level limits based upon the difference between measured ambient levels at noise-sensitive use property lines and predicted operational levels at proposed project property lines. Further, the City does not establish differing noise standards for weekdays and weekends. The assertion that "in many residential areas, Sundays are quieter than weekdays or Saturdays" is not based on any factual data or study; it is simply an assumption. Additionally, the noise analysis does account for the differences between day and nighttime truck operations, as shown in Appendix D of the noise memorandum (Appendix K of the Draft EIR).

The 8-foot noise barrier is not necessary for the proposed Project to avoid noise impacts and be considered less than significant. The wall was requested by the City and added by the Project applicant as a good faith measure to ease community concerns over visual and noise impacts. The wall itself attenuates predicted operation noise levels by approximately 2 to 3 dBA for the homes north of the San Diego River. Therefore, predicted operation noise levels without the wall are still well under the City threshold of 65 dBA L_{dn} at residential land uses. A higher wall would therefore be unnecessary, and the additional amount of noise reduction afforded by a taller wall would not be perceptible. The wall thickness is also irrelevant to the discussion of noise attenuation because diffraction of sound around noise walls limits their sound reduction effectiveness to the point at which a different material would not change its sound reduction effectiveness. The wall is expected to be a standard masonry wall of standard thickness to support the wall structure itself, which is adequate for a noise attenuating wall. Absorptive treatments may be

placed on the wall, but would not change its noise reduction effectiveness and are again not necessary for the project to avoid noise impacts.

The Project conforms to the City's noise threshold for industrial areas, which is 75 dBA L_{dn} at the property line. As shown in Figures 5 and 6 of the noise technical memorandum (Appendix K of the Draft EIR), the predicted noise level in the river area ranges from approximately 40 to 45 dBA during daytime hours and 35 to 40 dBA during nighttime hours, which is already under the existing ambient noise level as measured in the area. Further, wildlife noise impact evaluations generally use a 60 dBA threshold (refer to the San Diego Municipal Code, Land Development Code, Biology Guideline document, which discusses this threshold for relevant nesting bird species), which is far greater than the predicted operation noise levels beyond the project property boundary.

Regarding HVAC noise, the noise model assumed that the noise sources were distributed over a large portion of the roof area as a worst-case scenario. This is unlikely to be the case as generally HVAC sources are grouped together. Additionally, according to Project plans, a parapet would be installed on the building edge, which would further reduce the line-of-sight between the HVAC noise sources and the surrounding area. This parapet was not included in the modeling effort. Therefore, the noise analysis is considered a worst-case scenario with assumptions that actually overestimate the predicted noise levels.

One common concern expressed in the comments is for operational Project noise in violation of the City's Municipal Code. The Project would include loading and unloading activities as part of Project operation. Therefore, Project operations would be subject to Municipal Code Section 5.04.130 which makes it unlawful for any person to engage in loading, unloading, opening, idling of trucks, closing or other handling of boxes, crates, containers, building materials, garbage cans, dumpsters or similar objects between the hours of 10:00 p.m. and 7:00 a.m. in such a manner as to cause a noise disturbance within or adjacent to a residential district. While the proposed Project may operate 24/7, loading/unloading and other noise generating activities would be restricted to the hours stated in the noise ordinance with which the proposed Project, like all operations within the City, is required to comply.

Municipal Code Section 5.04.160 applies to any noise source not specifically addressed in Chapter 5.04, Noise Abatement and Control, except where exempted or excluded by Section 5.04.170. Section 5.04.160 states that it is unlawful for any person to generate any noise on the public way that is louder than average conversational level at a distance of 50 feet or more, vertically or horizontally, from the source between 10:00 p.m. and 7:00 a.m. Also, between 10:00 p.m. and 7:00 a.m., no person is permitted to generate any noise on any private open space that is louder than average conversational level at a distance of 50 feet or more, measured from the property line of the property from which the noise is being generated.

Comment Letter S1



CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

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June 4, 2025

11-SD-67
PM 3.054
Palisade Santee Commerce Center
DEIR/SCH#2023090144

Ms. Sandi Sawa
Director of Planning & Building
City of Santee
Planning & Building
10601 Magnolia
Santee, CA 92071

Dear Ms. Sawa:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the draft Environmental Impact Report (DEIR) for the Palisade Santee Commerce Center located at 10990 North Woodside Avenue near State Route 67 (SR-67) in Santee. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of Santee in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

"Improving lives and communities through transportation"

S1-1

Response to Comment Letter S1

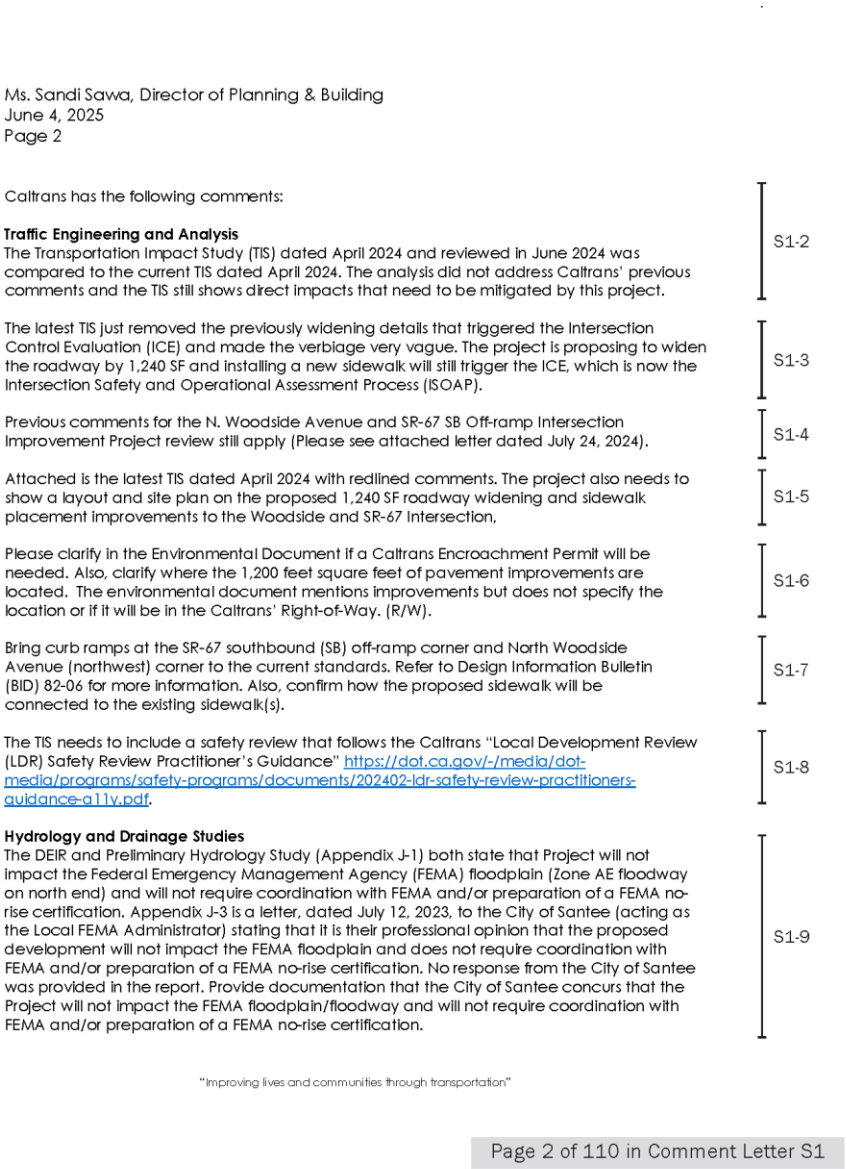
California Department of Transportation
Kimberly Dodson, Branch Chief
June 4, 2025

S1-1 The comment is an introduction to the comment letter describing the California Department of Transportation's (Caltrans's) goals and does not raise a significant new environmental issue regarding the adequacy or accuracy of the information provided in the Draft Environmental Impact Report (EIR). Therefore, no further response is required.

S1-2 The comment states that Caltrans previously reviewed the Transportation Impact Study (TIS) dated April 2024 and provided feedback in June 2024. The comment also states that Caltrans compared the previous version to the April 2025 [sic] and found that comments from June 2024 have not been addressed and there are direct impacts that need to be mitigated. While the letter stated that Caltrans compared the earlier version with the "current TIS dated April 2024," it is assumed that Caltrans meant the current TIS dated April 2025.

Attached to this comment letter dated June 4, 2025, Caltrans has provided comments in the text of Appendix L (TIS). These comments are identified as Comments S1-39 through S1-51. Responses to Caltrans's specific comments on the TIS are provided with those comments. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-3 The comment states that the latest TIS removed details regarding roadway widening that triggered the Intersection Control



Ms. Sandi Sawa, Director of Planning & Building
June 4, 2025
Page 2

Caltrans has the following comments:

Traffic Engineering and Analysis
The Transportation Impact Study (TIS) dated April 2024 and reviewed in June 2024 was compared to the current TIS dated April 2024. The analysis did not address Caltrans' previous comments and the TIS still shows direct impacts that need to be mitigated by this project. S1-2

The latest TIS just removed the previously widening details that triggered the Intersection Control Evaluation (ICE) and made the verbiage very vague. The project is proposing to widen the roadway by 1,240 SF and installing a new sidewalk will still trigger the ICE, which is now the Intersection Safety and Operational Assessment Process (ISOAP). S1-3

Previous comments for the N. Woodside Avenue and SR-67 SB Off-ramp Intersection Improvement Project review still apply (Please see attached letter dated July 24, 2024). S1-4

Attached is the latest TIS dated April 2024 with redlined comments. The project also needs to show a layout and site plan on the proposed 1,240 SF roadway widening and sidewalk placement improvements to the Woodside and SR-67 Intersection, S1-5

Please clarify in the Environmental Document if a Caltrans Encroachment Permit will be needed. Also, clarify where the 1,200 feet square feet of pavement improvements are located. The environmental document mentions improvements but does not specify the location or if it will be in the Caltrans' Right-of-Way. (R/W). S1-6

Bring curb ramps at the SR-67 southbound (SB) off-ramp corner and North Woodside Avenue (northwest) corner to the current standards. Refer to Design Information Bulletin (BID) 82-06 for more information. Also, confirm how the proposed sidewalk will be connected to the existing sidewalk(s). S1-7

The TIS needs to include a safety review that follows the Caltrans "Local Development Review (LDR) Safety Review Practitioner's Guidance" https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/202402-ldr-safety-review-practitioners-guidance-a11y.pdf. S1-8

Hydrology and Drainage Studies
The DEIR and Preliminary Hydrology Study (Appendix J-1) both state that Project will not impact the Federal Emergency Management Agency (FEMA) floodplain (Zone AE floodway on north end) and will not require coordination with FEMA and/or preparation of a FEMA no-rise certification. Appendix J-3 is a letter, dated July 12, 2023, to the City of Santee (acting as the Local FEMA Administrator) stating that it is their professional opinion that the proposed development will not impact the FEMA floodplain and does not require coordination with FEMA and/or preparation of a FEMA no-rise certification. No response from the City of Santee was provided in the report. Provide documentation that the City of Santee concurs that the Project will not impact the FEMA floodplain/floodway and will not require coordination with FEMA and/or preparation of a FEMA no-rise certification. S1-9

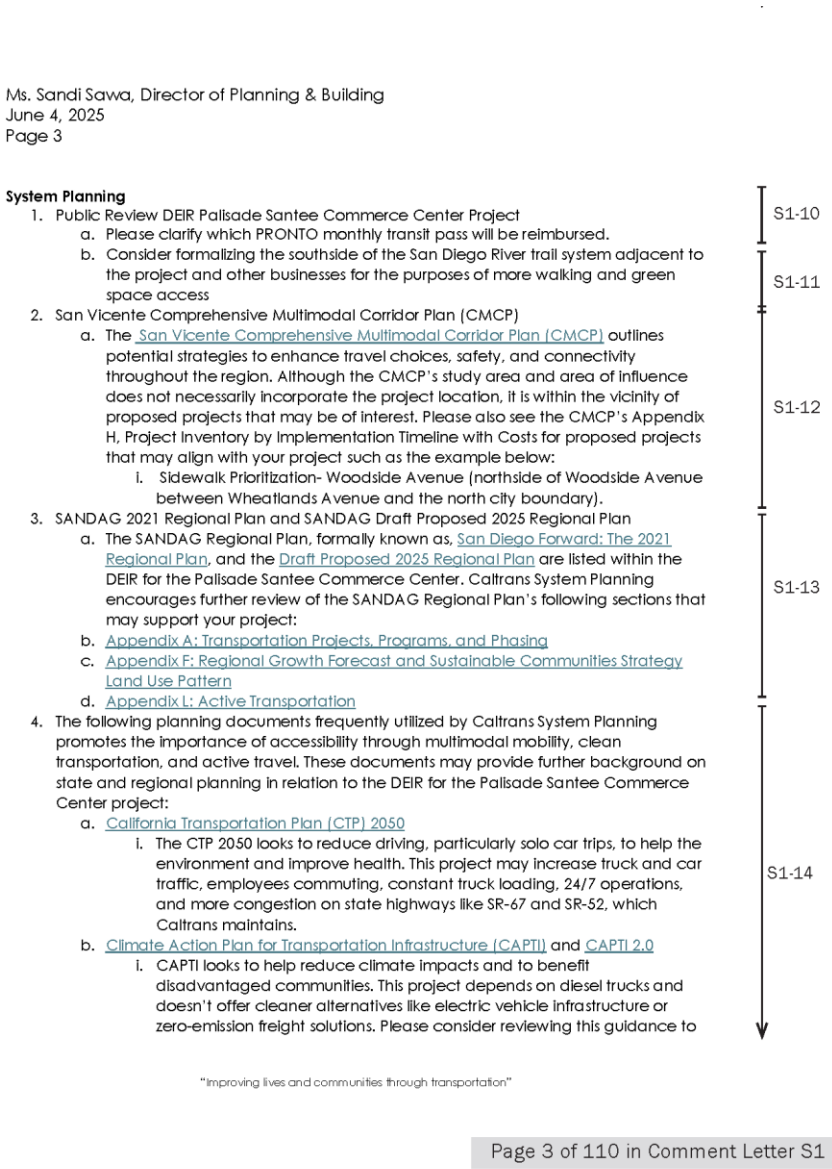
"Improving lives and communities through transportation"

Page 2 of 110 in Comment Letter S1

Evaluation (ICE) and made the language very vague. Further, the comment states that the project is proposing to widen the roadway by 1,240 square feet and installing a new sidewalk, which would still trigger the ICE, which is now known as the Intersection Safety and Operational Assessment Process (ISOAP).

As described in Thematic Response 1: Transportation, the Project does not propose any roadway improvements to alleviate LOS or traffic effects at the N. Woodside Avenue and SR-67 SB Off-Ramp Intersection, per current CEQA guidelines for determining transportation impacts. A queuing analysis of this ramp intersection included in the TIS (see Table 17) shows that under the Existing and Existing plus Project conditions, the westbound turn movements at the SR-67 off-ramp do not exceed the storage length available. The analysis indicates there are currently no queuing issues that may potentially spill back onto the SR-67 mainline. This determination satisfies the *Caltrans Local Development Intergovernmental Review (LDR) Safety Review Practitioners Guidance* (February 2024) requirements and the Project would not cause any safety related impacts to Caltrans facilities. The Project does not trigger the ISOAP because it does not have any safety related impacts.

While the Project generates over 1,000 daily trips, it would not add 1,000 or more trips to the N. Woodside Avenue and SR-67 SB Off-Ramp Intersection or SR-67 mainline. The Project does not propose a change in traffic control or install a pedestrian hybrid beacon and nor make a major physical change such as widening to provide an additional through or turn lane. Therefore, the Project would not trigger an ISOAP analysis. See PDF-TRA-1, MM-TRA-1, and MM-TRA-2 for proposed improvements and mitigation measures consistent with City requirements. This comment does not raise a new significant environmental issue



Ms. Sandi Sawa, Director of Planning & Building
June 4, 2025
Page 3

System Planning

1. Public Review DEIR Palisade Santee Commerce Center Project
   a. Please clarify which PRONTO monthly transit pass will be reimbursed.
   b. Consider formalizing the southside of the San Diego River trail system adjacent to the project and other businesses for the purposes of more walking and green space access
2. San Vicente Comprehensive Multimodal Corridor Plan (CMCP)
   a. The San Vicente Comprehensive Multimodal Corridor Plan (CMCP) outlines potential strategies to enhance travel choices, safety, and connectivity throughout the region. Although the CMCP's study area and area of influence does not necessarily incorporate the project location, it is within the vicinity of proposed projects that may be of interest. Please also see the CMCP's Appendix H, Project Inventory by Implementation Timeline with Costs for proposed projects that may align with your project such as the example below:
      i. Sidewalk Prioritization- Woodside Avenue (northside of Woodside Avenue between Wheatlands Avenue and the north city boundary).
3. SANDAG 2021 Regional Plan and SANDAG Draft Proposed 2025 Regional Plan
   a. The SANDAG Regional Plan, formally known as, San Diego Forward: The 2021 Regional Plan, and the Draft Proposed 2025 Regional Plan are listed within the DEIR for the Palisade Santee Commerce Center. Caltrans System Planning encourages further review of the SANDAG Regional Plan's following sections that may support your project:
   b. Appendix A: Transportation Projects, Programs, and Phasing
   c. Appendix F: Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern
   d. Appendix L: Active Transportation
4. The following planning documents frequently utilized by Caltrans System Planning promotes the importance of accessibility through multimodal mobility, clean transportation, and active travel. These documents may provide further background on state and regional planning in relation to the DEIR for the Palisade Santee Commerce Center project:
   a. California Transportation Plan (CTP) 2050
      i. The CTP 2050 looks to reduce driving, particularly solo car trips, to help the environment and improve health. This project may increase truck and car traffic, employees commuting, constant truck loading, 24/7 operations, and more congestion on state highways like SR-67 and SR-52, which Caltrans maintains.
   b. Climate Action Plan for Transportation Infrastructure (CAPTI) and CAPTI 2.0
      i. CAPTI looks to help reduce climate impacts and to benefit disadvantaged communities. This project depends on diesel trucks and doesn't offer cleaner alternatives like electric vehicle infrastructure or zero-emission freight solutions. Please consider reviewing this guidance to

S1-10
S1-11
S1-12
S1-13
S1-14

"Improving lives and communities through transportation"

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regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-4 The comment states that previous comments for the N. Woodside Avenue and SR-67 SB Off-Ramp Intersection Improvement Project still apply. Please see Responses to Comments S1-39 through S1-51. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-5 The comment states that the latest TIS dated April 2024 [sic] with comments is attached, and that the project needs to show a layout and site plan of the proposed roadway widening and sidewalk improvements to the Woodside Avenue and SR-67 intersection.

Regarding the comments on the current TIS, please see Responses to Comments S1-39 through S1-51. Regarding the layout and site plan, please see Figure RTC-1 illustrating Intersection Improvements at the N. Woodside Avenue and SR-67 SB Off-Ramp Intersection. Also please see PDF-TRA-1. MM-TRA-1, and MM-TRA-2 for proposed improvements. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-6 The comment requests clarification of whether a Caltrans Encroachment Permit will be needed, as well as clarification of the location of the pavement improvements identified in the Draft EIR. The encroachment permit may be required for construction of a small portion of the sidewalk within the

find options within your project that include support for climate impact reduction.

c. Smart Mobility Framework 2010
   i. The Smart Mobility Framework 2010 aims to reduce car dependence, promote walking, biking, and transit, build healthier and more connected communities, support climate goals, and improve equity and access. Please consider reviewing this guidance to find options within your project that include support for active and public transportation and decreasing emissions and congestion on state highways.
d. Active Transportation Program (ATP)
   i. ATP funds and promotes walking, biking, and safe street access. This project adds some sidewalks but lacks bike lanes, multiuse trails, or pedestrian-friendly design, especially for workers or residents nearby. ATP projects on or near state highways may be harder to justify when developments continue to ignore bike and pedestrian planning.
e. Interregional Transportation Improvement Program (ITIP)
   i. ITIP supports regional and interregional movement of goods and people. This project is freight-focused, it doesn't coordinate with broader freight corridors or regional transportation investments. Increased wear and tear on state freight routes like SR-67, SR-52 and SR-125 without corresponding upgrades or mitigation may strain Caltrans' infrastructure budgets.

5. Other proposed improvements:
   Please be aware of the following existing Caltrans project near the proposed project site, near Caltrans postmile 2.6 to 4.0:
   a. On SR-67 at postmiles 1.00 – 24.40 - work that includes: complete streets, Traffic Management Systems components, traffic signals. This project will potentially continue through the year 2033.
   b. On SR-67 at postmiles 3.70 – 4.20, operational improvements. This project will potentially continue through the year 2032.
   c. On SR-67 at postmiles 2.637 – 2.795, construct intersection improvements. This project will potentially continue through the year 2045.

Complete Streets and Mobility Network
Caltrans has the following comments for the North Woodside Avenue/SB SR-67 off-ramp:

- Remove the free right turn and "tee" up the intersection to make the facility more comfortable and safer for cyclists and pedestrians.
- Provide at minimum a 6-foot Class II bike lane through Caltrans' R/W that connects through the intersection of Woodside Avenue/SR-67 off-ramp on all legs of the intersection with the exception of the SR-67 SB off-ramp.
- The minimum width of sidewalk in Caltrans' R/W is 5 feet.
- A detour needs to be provided if there are any affects to pedestrian/bicycle facilities during construction.

S1-14 Cont.
S1-15
S1-16
S1-17
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S1-19

Caltrans right-of-way (ROW), as shown in Figure RTC-1 in this Final EIR. None of the proposed pavement improvements are within the Caltrans ROW. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-7 The comment directs the City to bring curb ramps at the SR-67 southbound off-ramp corner and North Woodside Avenue corner to the current standards with reference to Design Information Bulletin 82-06 for more information. Further, the comment requests confirmation of how the proposed sidewalk will be connected to existing sidewalks. Please see Figure RTC-1 in this Final EIR which illustrates the proposed Intersection Improvements at the N. Woodside Avenue and SR-67 SB Off-Ramp Intersection for details of existing and new sidewalk along N. Woodside Avenue, shown in green and blue colors. The sidewalk in Caltrans ROW is shown in green and within the City's ROW is shown in blue. The curb ramp at the SR-67 southbound off-ramp corner and North Woodside Avenue would be constructed per applicable design standards. The pavement rehabilitation and re-striping is shown as well and would occur within the City's ROW. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-8 The comment states that the TIS needs to include a safety review that follows the Caltrans "Local Development Review (LDR Safety Review Practitioner's Guidance" document. Please see Response to Comment S1-3 for discussion of consistency of the Project's TIS with Caltrans' safety review requirements. This comment does not raise a new significant environmental issue

- Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies. S1-20

Design

- Provide exhibits showing proposed sidewalk and pavement improvements described under Project Development Features (PDF-TRA-1). Unable to confirm location of sidewalk and pavement improvements listed. S1-21
- Verify need for retaining wall to support proposed sidewalk connection, where North Woodside Avenue meets the SB off-ramp from SR-67. The ground elevation at the adjacent property is much lower than at the proposed sidewalk. S1-22
- An encroachment permit will be required for any construction within Caltrans' R/W. The western portion of the sidewalk connection, where North Woodside Avenue meets the SB off-ramp from SR-67, is within Caltrans' R/W. S1-23

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies. S1-24

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

Hauling/Traffic Control Plan

The California Department of Transportation (Caltrans) has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: http://www.dot.ca.gov/trafficops/permits/index.html S1-25

A Traffic Control Plan is to be submitted to Caltrans District 11, including the interchanges at SR-67/North Woodside Avenue, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (SR-67) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins. S1-26

regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-9 The comment states that neither the Draft EIR nor the Preliminary Hydrology Study (Appendix J-1 of the Draft EIR) provides a response from the City of Santee pertaining to the FEMA floodplain. The comment requests documentation of the City's concurrence that the Project will not impact the FEMA floodplain/floodway and will not require coordination with FEMA and/or preparation of a FEMA no-rise certification. As stated on Draft EIR pages 4.8-25 and 4.8-26, the Project site is adjacent to a regulatory floodway but the Project site has been designed to not impact the existing floodplain, and the Project structures would be located at least one foot above the floodplain. As the Draft EIR was prepared by the City and reflects the City's evaluation of impacts, no additional documentation is necessary. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-10 The comment relates to system planning and requests clarification of which PRONTO monthly transit pass will be reimbursed. Item 3, Implement Subsidized or Discounted Transit Program, under MM-TRA-1 Trip Reduction Program in the Draft EIR and TIS mentions that a monthly transit pass would be provided or cost would be reimbursed to the employees who use transit to commute to the Project. The card can be used for all buses, Trolley, Sprinter, and Coaster, including services operated by the Metropolitan Transit System (MTS) and the North County Transit District (NCTD) in the San Diego region. Further details would be worked out between the employer and specific

Noise
The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-67. S1-27

Environmental
Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the Environmental Document that Caltrans will use for our subsequent environmental compliance. S1-28

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures. S1-29

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's Final Environmental Document. S1-30

Sustainability
Caltrans recommends collaboration between our agency and the City of Santee on the proposed transportation related topics including adaptation strategies to help improve the City's resilience to potential climate change impacts and strategies to reduce vehicle miles traveled (VMT), and off-road and on-road greenhouse gas (GHG) emissions.

Caltrans recognizes that transportation is a leading contributor to GHG emissions in the region and is dedicated to reducing and mitigating transportation related emissions. We recommend collaborating with Caltrans on the following measures such as increasing the use of zero emission vehicles, installing electric vehicle (EV) charging stations, identifying R/W areas to be used for carbon sequestration, and complete streets. S1-31

The existing climate hazards discussed in this document will have an impact of the transportation system. We recommend working with Caltrans on determining the preventative strategies Caltrans can take to keep roadways operational and ensure their longevity against climate stressors such as increased temperatures, changes in precipitation patterns, wildfire,

employees based on their travel needs. No further details can be provided at this time. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-11 The comment urges consideration of formalizing the southside of the San Diego River trail system adjacent to the project site and other businesses for purposes of more walking and green space access. The proposed Project does not trigger the formalization of such a system, however implementation of the proposed Project would not preclude formalizing this trail system. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-12 The comment relates to system planning and urges the City to look at the San Vicente Comprehensive Multimodal Corridor Plan (CMCP) for projects that may align with the proposed Project. The San Diego Association of Governments (SANDAG) and Caltrans are developing a Comprehensive Multimodal Corridor Plan (CMCP) for the San Vicente corridor. The CMCP proposes local road and network improvements to balance future transportation needs while also preserving existing rural and community characteristics including the natural landscape of mountains, hills, valleys, lakes, and creeks. It focuses on improving transportation along SR-67 between Lakeside and Ramona. As such, the Woodside Avenue Safety Improvement Project and SR/67 Riverford Road Interchange Project are noted in the CMCP. The proposed Project would improve sidewalks and striping along N. Woodside Avenue as shown in Figure RTC-1 of this Final EIR. The Project would construct an eastbound left turn

and flooding. Caltrans recognizes the central role that transportation planning plays in safety and ensuring that when these natural hazards do occur, citizens have a reliable evacuation route.

Right-of-Way
Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by visiting the website at https://dot.ca.gov/programs/traffic-operations/ep. Projects with the following:

- require a Caltrans Encroachment Permit
- have completed the Caltrans Local Development Review (LDR) process
- have an approved environmental document

need to have documents submitted for Quality Management Assessment Process (QMAP) process via email to D11.QMAP.Permits@dot.ca.gov. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Mark McCumsey, LDR Coordinator, at (619) 985-4957 or by e-mail sent to Mark.McCumsey@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review

Attachments – Caltrans Letter dated 07-24-2024
Redlined comments – Appendix L - Transportation Impact Study

S1-31 Cont.

S1-32

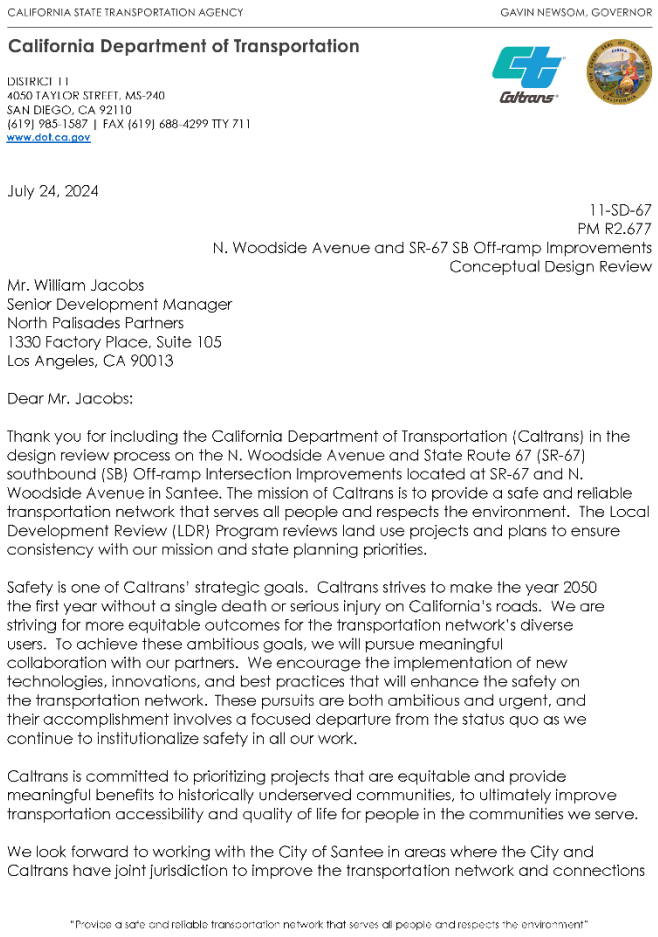
S1-33

lane to facilitate safe truck turn movements to the Project driveway from N. Woodside Avenue. Additionally, the proposed Project would not conflict or impede implementation of this plan, or projects proposed as part of the CMCP in the future. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-13 The comment related to system planning and urges the City to review the SANDAG Regional Plan and the Draft Proposed 2025 Regional Plan. The Project's consistency with the SANDAG Regional Plan has been evaluated in the Draft EIR, in Table 4.9-2 beginning on page 4.9-12 of the Draft EIR. As described in Table 4.9-2, the Project would be consistent with the applicable goals set forth by SANDAG in the 2021 Regional Plan. Therefore, impacts would be less than significant. Further, the VMT analysis and proposed mitigation measures will ensure the Project's consistency with regional plan and policies. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-14 The comment identifies five planning documents frequently utilized by Caltrans that may provide background on state and regional planning. Comment noted. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

S1-15 The comment identifies three existing Caltrans projects near the Project site. Comment noted. The comment does not raise a new significant environmental issue regarding the adequacy or



CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

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July 24, 2024

11-SD-67
PM R2.677
N. Woodside Avenue and SR-67 SB Off-ramp Improvements
Conceptual Design Review

Mr. William Jacobs
Senior Development Manager
North Palisades Partners
1330 Factory Place, Suite 105
Los Angeles, CA 90013

Dear Mr. Jacobs:

Thank you for including the California Department of Transportation (Caltrans) in the design review process on the N. Woodside Avenue and State Route 67 (SR-67) southbound (SB) Off-ramp Intersection Improvements located at SR-67 and N. Woodside Avenue in Santee. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of Santee in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections

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S1-34

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accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

S1-16 The comment states that the project needs to remove the free right turn and "tee" up the intersection of North Woodside Avenue/SB SR-67 off-ramp. As shown in the TIS (Appendix L of the Draft EIR), the Project would not add any trips to the free (channelized) right turn available at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp. There are no queuing related impacts per the safety review of Caltrans facilities conducted in the Project's TIS (Appendix L of the Draft EIR). As explained in the Thematic Response 1: Transportation, traffic delay under an LOS metric is no longer considered a significant environmental impact under CEQA. The Project proposes multi-modal improvements such as construction of sidewalk at this intersection to connect to the existing sidewalk along Woodside Avenue. The bicycle lane at the intersection and along Woodside Avenue will be maintained as-is. Bicycle, pedestrian, and public transit access will be maintained during construction. For any construction work in the public ROW, the contractor shall prepare a Traffic Control Plan to ensure access for all road users is maintained during construction. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-17 The comment states that the Project needs to provide at minimum a 6-foot Class II bike lane through Caltrans ROW that connects the intersection of Woodside Avenue/SR-67 offramp on all legs of the intersection with the exception of the SR-67 off-ramp. There are existing bike lanes on all three legs of City streets. The striping on the southeast corner of the intersection is meant to be a bike lane, but that location is within Caltrans'

between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Traffic Operations

- The proposed widening of N. Woodside Avenue approach leg to the Caltrans intersection of SR-67 triggers the Intersection Control Evaluation (ICE) Policy per Caltrans Traffic Operations Policy Directive (TOPD) #13-02.
- The submitted Traffic Impact Study (TIS) recommended improvements do not meet Caltrans policy directives. Please see redline comments on attached redlined TIS.
- The TIS shows Vehicle Miles Traveled (VMT) Impacts that need to be mitigated.
- Adjust 95th percentile after trip distributions have been updated.
- The TIS shows a direct impact to the intersection of N. Woodside Avenue and SB SR-67 exit-ramp with the increase of passenger vehicles and varying sizes of trucks now proposed accessing the site through Caltrans facilities. The current use of the closed Drive-in theater during peak hours is zero vs the now proposed use shown in Table 4 from the TIS increases it.

Hydrology and Drainage Studies

- Please provide hydraulics studies, drainage and grading plans to Caltrans for review.
- Provide a pre- and post-development hydraulics and hydrology study. Show drainage configurations and patterns.
- Provide drainage plans and details, include detention basin details of inlets/outlet.
- Provide a contour grading plan with legible callouts and minimal building data. Show drainage patterns.
- On all plans, show Caltrans' R/W.
- Early coordination with Caltrans is recommended.
- Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

System Planning

- The Coast, Canyons, and Trails Comprehensive Multimodal Corridor Plan (CMCP) should be reviewed and incorporated in the development of the N. Woodside Avenue and SR-67 SB Off-ramp Intersection Improvements project. The final

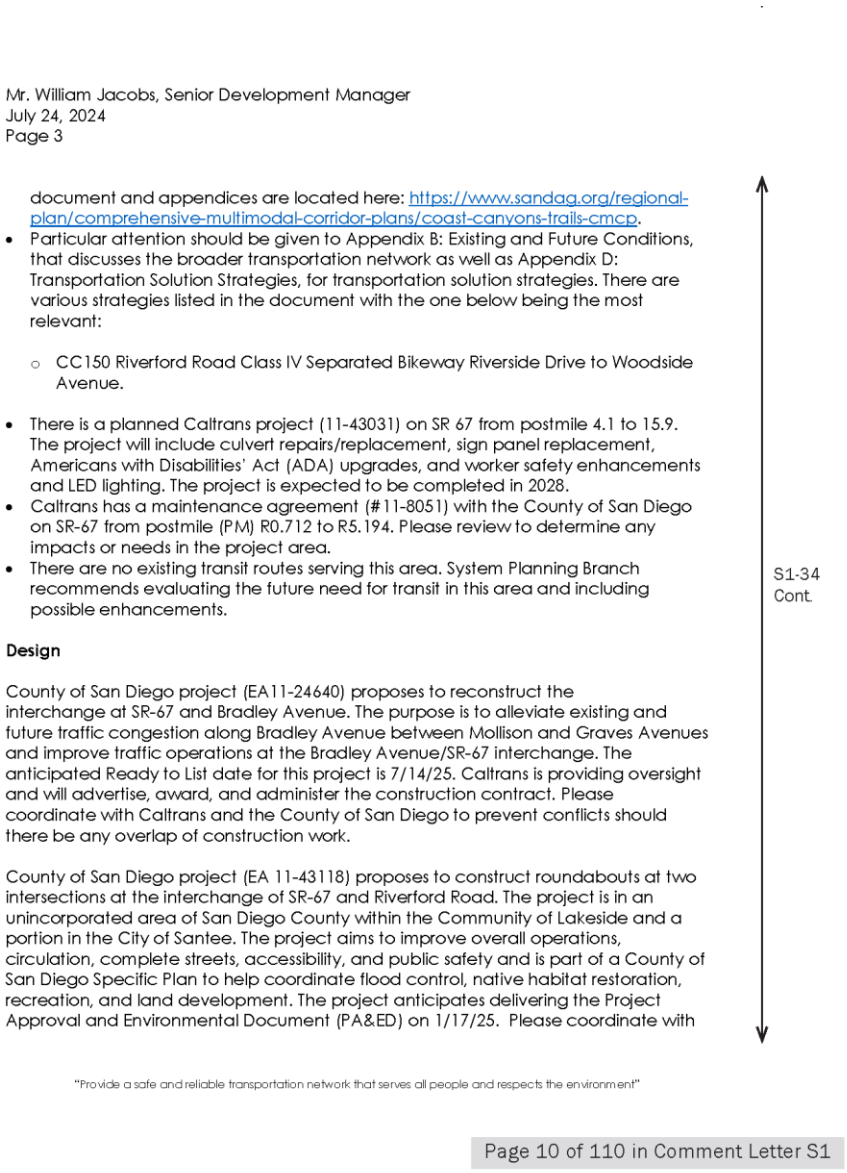
S1-34 Cont.

jurisdiction. The proposed Project does not include any change to the existing bike lane along N. Woodside Avenue. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-18 The comment states that the minimum width of sidewalks in Caltrans right-of-way is 5 feet. Comment noted. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

S1-19 The comment states that a detour needs to be provided if there are any effects on pedestrian or bicycle facilities during construction. The City of Santee requires preparation of a Traffic Control Plan for construction that includes roadways, which is the case with the proposed project. The City's Traffic Engineering Division reviews traffic control plans, which shall follow the Manual on Uniform Traffic Control Devices California Edition (MUTCD) and the San Diego Regional Standard Drawings. The MUTCD includes consideration for pedestrian and bicycle facilities. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-20 The comment states that mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies. As discussed above in Response to Comment S1-19, a TCP would be prepared for the Project. Regarding transit access, the Draft EIR (p. 4.12-23) states that the nearest bus stop is located west of Magnolia Avenue and Mission Gorge Road – Woodside Avenue intersection, approximately 0.90 miles from the Project site.



Mr. William Jacobs, Senior Development Manager
July 24, 2024
Page 3

document and appendices are located here: https://www.sandag.org/regional-plan/comprehensive-multimodal-corridor-plans/coast-canyons-trails-cmcp.

- Particular attention should be given to Appendix B: Existing and Future Conditions, that discusses the broader transportation network as well as Appendix D: Transportation Solution Strategies, for transportation solution strategies. There are various strategies listed in the document with the one below being the most relevant:
  - CC150 Riverford Road Class IV Separated Bikeway Riverside Drive to Woodside Avenue.
- There is a planned Caltrans project (11-43031) on SR 67 from postmile 4.1 to 15.9. The project will include culvert repairs/replacement, sign panel replacement, Americans with Disabilities' Act (ADA) upgrades, and worker safety enhancements and LED lighting. The project is expected to be completed in 2028.
- Caltrans has a maintenance agreement (#11-8051) with the County of San Diego on SR-67 from postmile (PM) R0.712 to R5.194. Please review to determine any impacts or needs in the project area.
- There are no existing transit routes serving this area. System Planning Branch recommends evaluating the future need for transit in this area and including possible enhancements.

S1-34 Cont.

Design

County of San Diego project (EA11-24640) proposes to reconstruct the interchange at SR-67 and Bradley Avenue. The purpose is to alleviate existing and future traffic congestion along Bradley Avenue between Mollison and Graves Avenues and improve traffic operations at the Bradley Avenue/SR-67 interchange. The anticipated Ready to List date for this project is 7/14/25. Caltrans is providing oversight and will advertise, award, and administer the construction contract. Please coordinate with Caltrans and the County of San Diego to prevent conflicts should there be any overlap of construction work.

County of San Diego project (EA 11-43118) proposes to construct roundabouts at two intersections at the interchange of SR-67 and Riverford Road. The project is in an unincorporated area of San Diego County within the Community of Lakeside and a portion in the City of Santee. The project aims to improve overall operations, circulation, complete streets, accessibility, and public safety and is part of a County of San Diego Specific Plan to help coordinate flood control, native habitat restoration, recreation, and land development. The project anticipates delivering the Project Approval and Environmental Document (PA&ED) on 1/17/25. Please coordinate with

"Provide a safe and reliable transportation network that serves all people and respects the environment"

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Because there are no transit facilities that would be affected by Project construction and a TCP is required by the City for construction activities that would affect roadways (including sidewalks and bike lanes), the mitigation suggested by the comment is not necessary. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-21 The comment states that Caltrans is unable to confirm the location of the sidewalk and pavement improvements identified in the Draft EIR, and requests exhibits showing the proposed improvements. While the text of both the Draft EIR and TIS (Appendix L) described the location and extent of the sidewalk and pavement improvements, a graphical depiction of the improvements has been included as Figure RTC-1 within this Final EIR. The figure can be found within Thematic Response 1: Transportation. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-22 The comment requests the City verify the need for a retaining wall to support the proposed sidewalk connection where North Woodside Avenue meets the southbound off-ramp from SR-67, stating that the ground elevation at the adjacent property is much lower than at the proposed sidewalk. Based on the topographic survey, there is sufficient level ground to install the sidewalk without creating a retaining condition. The City will have the opportunity to confirm this conclusion during the plan check process after a full design has been prepared. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Caltrans and the County of San Diego to prevent conflicts should there be any overlap of construction work.

Please provide the latest updated schedule and cost estimate for the "N. Woodside Avenue and SR-67 Off-ramp Intersection Improvements" project once one is available.

Please coordinate traffic circulation improvement strategies in relation to the nearby proposed projects noted above.

Noise

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-67.

Environmental

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. Please indicate our status as a Responsible Agency for the Final Environmental Document. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the Environmental Document that Caltrans will use for our subsequent environmental compliance.

S1-34 Cont.

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project that include the work in Caltrans' R/W, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.
We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

S1-23 The comment states that an encroachment permit will be required for any construction within Caltrans right-of-way, and notes that the western portion of the sidewalk connection, where N. Woodside Avenue meets the southbound off-ramp from SR-67 is within Caltrans ROW. The comment is noted. Figure RTC-1 of the Final EIR shows the portion of sidewalk within the Caltrans ROW in green color. For any construction in the Caltrans ROW, the applicant shall obtain required permits. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-24 The comment states that the City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction. Comment noted. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

S1-25 The comment states that Caltrans has discretionary authority over special permits for vehicle size or weight exceeding the maximum limitations of the California Vehicle Code. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

S1-26 The comment states that a Traffic Control Plan must be submitted to Caltrans at least 30 days prior to the start of construction for work involving the interchanges at SR-67/North Woodside Avenue. Further, the comment notes that potential impacts to SR-67 and the traveling public should be addressed before work begins. This is a standard requirement for construction impacting Caltrans facilities and would be complied

Right-of-Way

- There is one monument on the Caltrans' R/W. Since the rear set back is determined by the R/W, please confirm it has been properly surveyed.
- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.
- An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

S1-34 Cont.

If you have any questions or concerns, please contact Mark McCumsey, LDR Coordinator, at (619) 985-4957 or by e-mail sent to mark.mccumsey@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review

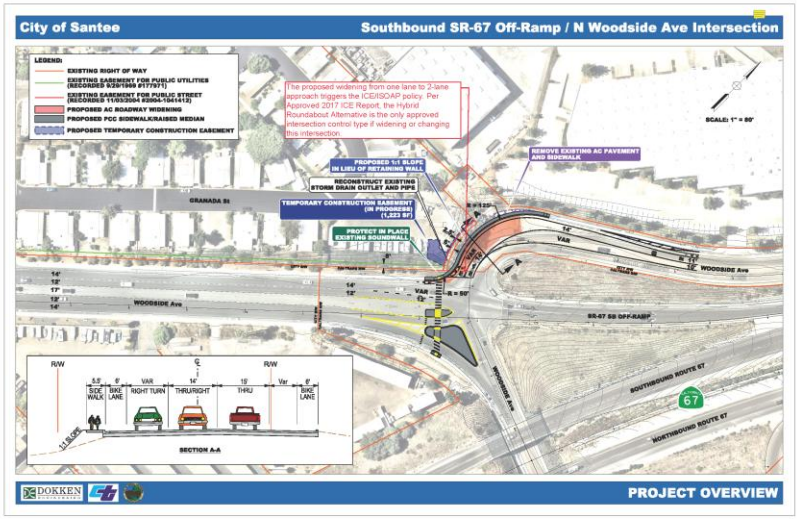
Attachment: TEA Reviewed Layout Sheets Exhibits

with by the Project applicant. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-27 The comment states that the applicant must be informed that Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-67. The applicant is aware of the existing and cumulative noise environment at the project site, which includes traffic noise from SR-67. The noise analysis prepared as part of the project includes current ambient noise measurements that reflect traffic noise from SR-67. In addition, the cumulative noise condition takes into consideration future noise from SR-67. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

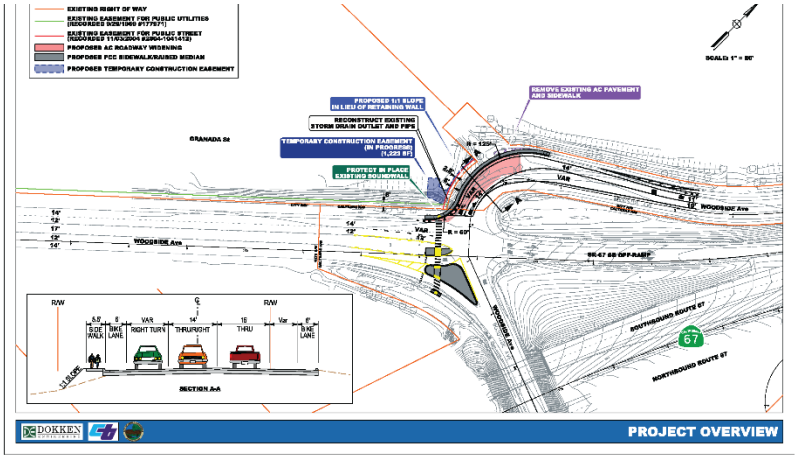
S1-28 The comment states that Caltrans is a Responsible Agency under CEQA and would appreciate meeting with the City to discuss the elements of the environmental document that Caltrans would use for their environmental compliance. As discussed on Draft EIR page 3-47, the City acknowledges that responsible and/or trustee agencies may use the Draft EIR for CEQA documentation for approvals under their authority. Additionally, Draft EIR page 3-48 states that Caltrans' approval would be needed for improvements within Caltrans' right-of-way (ROW). The City supports continued coordination with Caltrans. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

S1-29 The comment states that an encroachment permit will be required prior to construction for any work within Caltrans right-of-way and



S1-35

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S1-36

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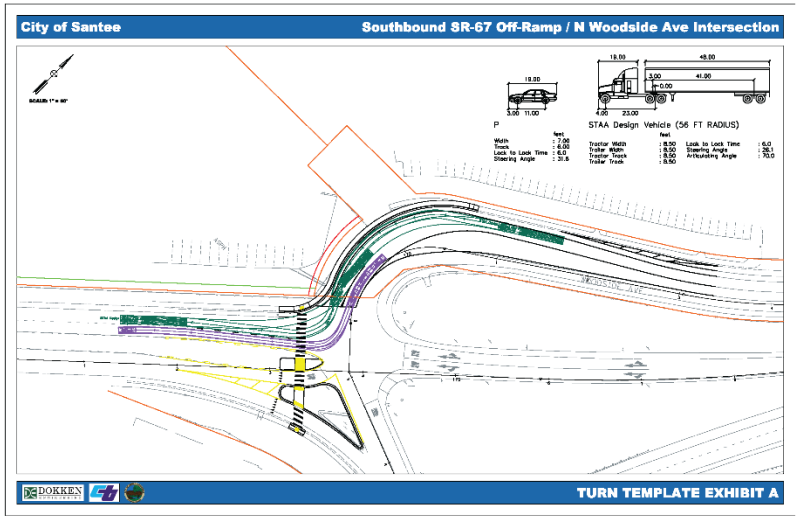
provides information regarding what information will be needed. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

S1-30 The comment recommends that the Project identify and assess potential impacts caused by the Project or from mitigation efforts that occur within Caltrans ROW. Further, the comment states that Caltrans is interested in any additional mitigation measures identified in the Project's Final EIR. As discussed in Thematic Response 1: Transportation, the text of PDF-TRA-1 and MM-TRA-2 have been revised. There are no changes proposed to MM-TRA-1. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-31 The comment recommends collaboration between the City of Santee and Caltrans. Comment noted. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

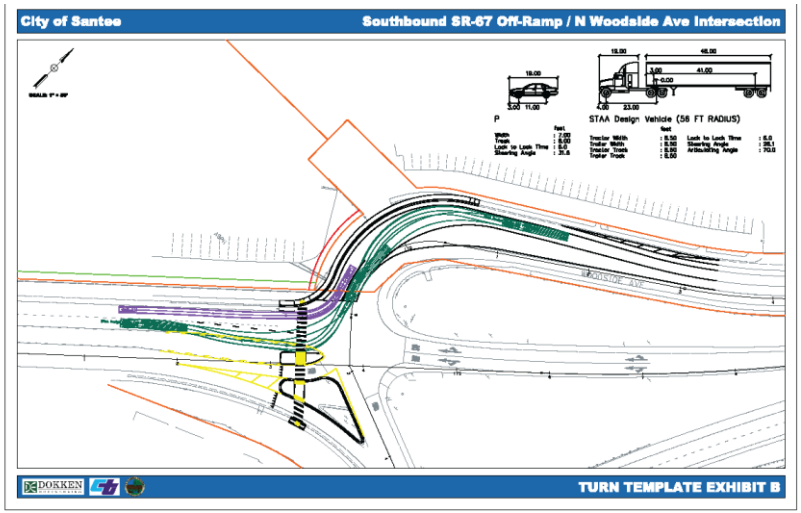
S1-32 The comment states that perpetuation of survey monuments is required if they are being destroyed by construction. The Project applicant will adhere to all state laws, including those requiring perpetuation of survey monuments. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

S1-33 The comment summarizes previous information about encroachment permits. The comment does not raise a new significant environmental issue regarding the adequacy or



S1-37

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S1-38

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accuracy of the information provided in the Draft EIR. Therefore, no response is required.

S1-34 The comment includes a letter dated July 24, 2024 and provides comments from Caltrans regarding conceptual design review of North Woodside Avenue and SR-67 southbound off-ramp improvements. The letter is addressed to the Project applicant, not the City of Santee. Further, Project improvements have been revised since the date of the letter (July 24, 2025). Please see Thematic Response 1: Transportation for information regarding the current plans for improvements to be constructed as part of the proposed Project. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-35 This comment appears in an attachment to the letter referenced in Comment S1-34. The comment states that the proposed widening from one lane to two triggers the ICE/ISOAP. Further, the Hybrid Roundabout Alternative is the only approved intersection control type if widening or changing this intersection. Please see response to comment S1-3 and Thematic Response 1: Transportation for information regarding the direct impacts per LOS and changes in proposed work at this intersection. For Project's VMT impacts, feasible mitigation measures and applicable reduction percentages have been identified in the TIS and Draft EIR. The queuing analysis in the TIS uses the updated Project trip distribution percentages confirmed with the City's traffic engineer and used in the TIS.

S1-36 This comment appears in an attachment to the letter referenced in Comment S1-34. The graphic depicts the Project Overview, Southbound SR-67 Off-Ramp/ N. Woodside Ave Intersection. The comment does not raise a new significant environmental issue

Appendix L
Transportation Impact Study

S1-39

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regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

S1-37 This comment appears in an attachment to the letter referenced in Comment S1-34. The graphic depicts the Turn Template Exhibit A, Southbound SR-67 Off-Ramp/ N. Woodside Ave Intersection. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

S1-38 This comment appears in an attachment to the letter referenced in Comment S1-34. The graphic depicts the Turn Template Exhibit B, Southbound SR-67 Off-Ramp/ N. Woodside Ave Intersection. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

S1-39 The comment includes Appendix L (TIS) as it appeared in the Draft EIR. The comments that follow are the comments made by Caltrans on Appendix L. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

S1-40 The comment (imbedded within Figure 3, Project Trip Distribution, on page 15 of the TIS) states that the Caltrans comments from June 2024 have not been addressed.

Regarding the June 2024 comment letter, please see Response to Comment S1-34. Also note that the April 2024 version of the TIS that Caltrans reviewed and commented on in June 2024 was updated. The trip distribution rates were modified to reflect a portion of truck trips that would be expected to drive north along N. Woodside Avenue from the Project site. The comment does



Transportation Impact Study

Palisade Santee Commerce Center Project

APRIL 2025

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not specify which comments have not been addressed. The comment is general and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

S1-41 The comment notes that the VMT impacts discussed on page 35 of the TIS dated April 2025 (Appendix L of the Draft EIR) are the same as those reflected in the April 2024 draft version of the TIS reviewed by Caltrans. The comment is general and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no response is required.

S1-42 The comment states that previous comments from the June 2024 review were not addressed and still apply. The comment is on page 49 of the TIS (Appendix L of the Draft EIR) and located beneath Table 10, but does not point to specific information or specify the comments that were not addressed. The comment is general and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

S1-43 The comment states that there is a direct impact to a Caltrans intersection going from existing LOS C to LOS E under the Existing Plus Project scenario. This comment is on page 49 of the TIS (Appendix L of the Draft EIR) and points to line item 4 in Table 10, which is listed as the intersection of Woodside Avenue/ S. Woodside Avenue – SR-67 SB Off-Ramp.

As stated on page 4.12-14 of the Draft EIR, "LOS has been addressed herein for informational purposes only and can no longer be used to determine significant transportation impacts under CEQA as directed by SB 743." Please see Response to Comment

S1-3 and Thematic Response 1: Transportation for more information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-44 The comment states that previous comments from the June 2024 review were not addressed and still apply. The comment is on page 63 of the TIS (Appendix L of the Draft EIR) and located beneath Table 14, but does not point to specific information or specify the comments that were not addressed. The comment is general and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

S1-45 The comment states that there is a direct impact to a Caltrans intersection that requires mitigation. This comment is on page 63 of the TIS (Appendix L of the Draft EIR) and points to line item 4 in Table 14, which is listed as the intersection of N. Woodside Avenue/ S. Woodside Avenue – SR-67 SB Off-Ramp.

As stated on page 4.12-14 of the Draft EIR, "LOS has been addressed herein for informational purposes only and can no longer be used to determine significant transportation impacts under CEQA as directed by SB 743." Please see Thematic Response 1: Transportation for information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

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S1-46 The comment states that previous comments from the June 2024 review were not addressed and still apply. The comment is on page 79 of the TIS (Appendix L of the Draft EIR) and located

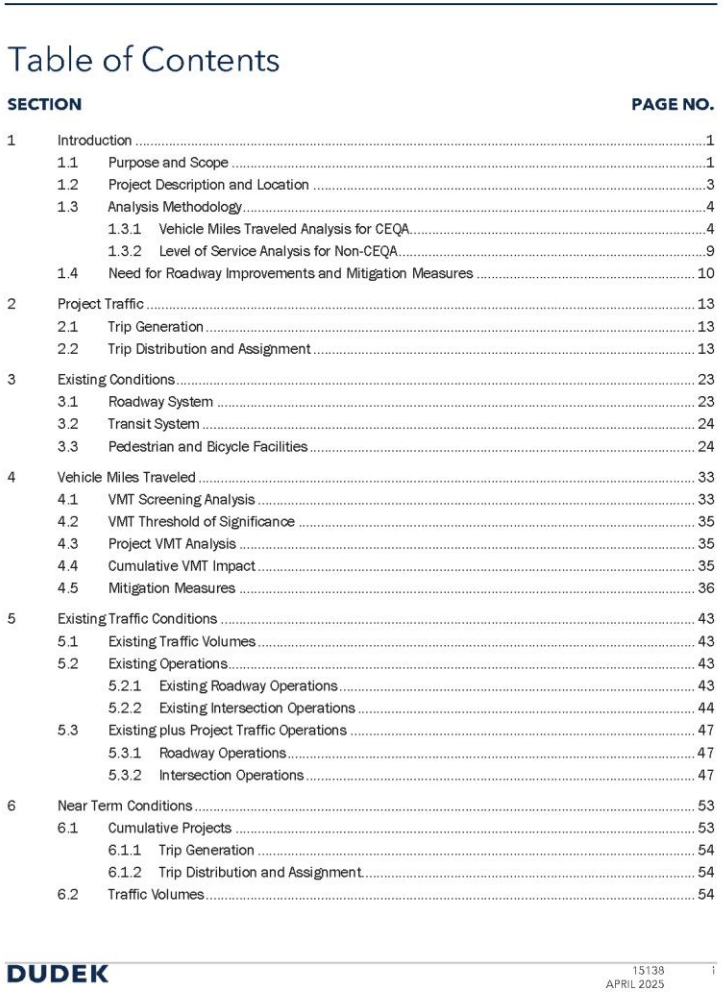


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beneath Table 17, but does not point to specific information or specify the comments that were not addressed. The comment is general and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

S1-47 The comment states that the 95th percentile should be updated after trip distributions have been updated. This comment appears on page 79 of the TIS (Appendix L of the Draft EIR) and points to Table 17, Queuing Summary for Existing Conditions (95th Percentile Queue). Prior to release of the Draft EIR for public review, the Project's trip distributions were updated, which are reflected in the TIS dated April 2025 (Appendix L of the Draft EIR). Figure 3 in the TIS illustrates the percentage distribution of cars and trucks along N. Woodside Avenue and the traffic study area approved by the City. The queuing analysis shown in Table 17 of the TIS uses the updated distribution compared to the April 2024 version of the traffic analysis. Therefore, no further analysis is required. Further, this comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project and no further response is required.

S1-48 The comment states that Table 19 is missing, which previously showed Queuing Summary for Near Term Conditions (95th Percentile Queue) and states that the table and results should be resubmitted. Beginning on page 77 of the TIS, there is a Project-specific analysis for the Caltrans ramp intersection using queuing analysis methodology for safety review per Caltrans LDR guidelines. The LDR guidelines require that the project's impact be compared to the existing scenario to determine whether a deficiency currently exists and if the project contributes to or worsens an existing condition. The analysis in the TIS indicated that under Existing Plus

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Project conditions, most queues would be accommodated within existing storage. Therefore, a near-term condition queuing analysis is not needed, and a corresponding table s not included in the TIS. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-49 The comment highlights text within PDF-TRA-1 and comments that the improvements of widening and sidewalk installation trigger the ISOAP, which supersedes the ICE. The comment also states that in previous reviews, Caltrans has made the Project applicant aware that there is an ICE Report for the approved hybrid roundabout. The comment appears on page 81 of the TIS (Appendix L of the Draft EIR). Please see Thematic Response 1: Transportation for the updated language of PDF-TRA-1 and a discussion of the improvements. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-50 The comment states that there is no table showing the direct impacts being mitigated with the proposed widening and sidewalk. Further, the comment states that the TIS fails to show how the roadway widening and sidewalk installation would bring LOS back to LOS D or better. Please see Thematic Response 1: Transportation for information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

S1-51 The comment highlights text and comments that as previously mentioned in the June 2024 review, the improvement triggers

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A Transportation Scoping Document
B VMT Mitigation Measures
C Traffic Counts
D Signal Timing Sheets
E Intersection LOS Worksheets – Existing Conditions
F Cumulative Projects Information
G Intersection LOS Worksheets – Near Term Conditions
H Intersection LOS Worksheets – Horizon Year

the ISOAP and that plans have already been approved for a hybrid roundabout. Further, the comment states that the proposed Project would have direct impacts to the Caltrans intersection and further coordination with Caltrans will be required. Please see Thematic Response 1: Transportation and Response to Comment S1-3 for information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I Excerpt from AASHTO - Left Turn Lane Evaluation
J Conceptual Sketch - N. Woodside Avenue/ S. Woodside Avenue - SR-67 SB Off-Ramp Intersection
K Queuing Worksheets
L Applicant Prepared Request for Finding of Overriding Social, Economic, and Pedestrian Safety Benefit

1 Introduction

1.1 Purpose and Scope

The purpose of this Transportation Impact Study (TIS) is to identify impacts associated with a proposed 300,145 square foot (SF) industrial/warehousing building (proposed project or project) in the City of Santee (City). Pursuant to Senate Bill (SB) 743, the focus of transportation analyses has shifted from vehicle delay (and level of service [LOS]) to vehicle miles traveled (VMT) under the California Environmental Quality Act (CEQA). Given the need to prepare VMT-based CEQA transportation impact analyses per SB 743, the City's VMT guidelines were released in April 2022. The need to evaluate the performance of the roadway system based on delay and LOS is for General Plan consistency requirements. The objectives of this study are to provide both, CEQA and non-CEQA assessments of the project per analysis methodology and guidelines adopted by the City. Therefore, this TIS has been prepared consistent with the City of Santee VMT Analysis Guidelines (April 13, 2022), Guidelines for Transportation Impact Studies in the San Diego Region (May 2019) and the City of Santee Mobility Element (October 2017).

The scope of the analysis was submitted to the City for approval prior to preparing this study. The approved scope is included in Appendix A.

CEQA Assessment

- Provide a VMT analysis per SB 743, CEQA requirements, and City's VMT Analysis Guidelines.
- Identify mitigation measures for any significant transportation impacts.

The study area for the CEQA analysis is the San Diego region, and the SANDAG SB 743 VMT maps have been used in the project's VMT analysis.

Non-CEQA Assessment

- Estimate trip generation, distribution, and assignment characteristics of the project.
- Document existing roadway, pedestrian, bicycle, and transit facilities in the study area.
- Document Existing, Near Term, and Horizon Year traffic conditions (without and with project), including intersection LOS and roadway segment capacity analysis.
- Analyze the potential for LOS and capacity effects to occur as a result of the project under the Existing Near Term and Horizon Year conditions.
- Provide evaluation of left turn at the project access driveway at Woodside Avenue.
- Describe if any operational or physical network improvements are needed.
- Provide findings and recommendations based on the non-CEQA assessment of the project.

The study area for the LOS analysis is generally based on the threshold of 50 or more AM or PM peak-hour project trips that pass through an intersection. Based on the project's trip generation (Table 1) and trip distribution shown on Figure 3, the following roadway segments and intersections are proposed for the project's LOS analysis:

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Roadway Segments

1. N. Woodside Avenue, between Project Driveway and Woodside Avenue
2. Woodside Avenue, between Magnolia Avenue and N. Woodside Avenue – Woodside Avenue
3. Magnolia Avenue, between Woodside Avenue-Mission Gorge Road and State Route (SR)-52 westbound on-ramp-SR-67 southbound on-ramp

Intersections

1. Magnolia Avenue/SR-52 eastbound off-ramp
2. Magnolia Avenue/SR-52 westbound on-ramp - SR-67 southbound on-ramp
3. Magnolia Avenue-Mission Gorge Road/Woodside Avenue
4. N. Woodside Avenue/Woodside Avenue – SR-67 southbound off-ramp
5. Hartley Road/N. Woodside Avenue
6. Wheatlands Avenue/N. Woodside Avenue
7. Project Access Roadway/N. Woodside Avenue

Figure 1, Project Location and Study Area, shows the project location and study area selected to assess the project's potential traffic effects.

Analysis Scenarios

Roadway segment and intersection LOS analyses were prepared for the weekday 24-hour average daily traffic (ADT) condition and AM and PM peak hours at the study area roadway segments and intersections, respectively, for the following analysis scenarios:

Existing Conditions

The TIS includes a description of existing traffic conditions in the site vicinity, including existing roadway system, existing weekday AM and PM peak-hour traffic volumes, and operational analysis of the study area roadway segments and intersections. The existing condition is representative of the year 2023.

Existing plus Project

This condition includes analysis of traffic operations under existing conditions with project traffic added to the existing ADT and AM and PM peak hour intersection traffic volumes. The traffic effects specific to the project under this condition were used as the basis for determining the project's direct effects.

Near Term Conditions

This condition includes analysis of traffic operations under Near Term conditions within a short-term horizon period of approximately three years where the proposed project is constructed and fully occupied. Near Term traffic volumes (ADT and AM and PM peak hour) include existing traffic volumes and traffic generated by other approved and pending projects in the study area. The approved or pending projects are developments in the review process, but not fully approved; or projects that have been approved, but not fully constructed or occupied.

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Near Term plus Project

This condition includes analysis of traffic operations under Near Term conditions with project traffic added to the Near-Term ADT and AM and PM peak hour intersection traffic volumes. The traffic effects specific to the project under this condition were used as the basis for determining the project's short-term cumulative effects.

Horizon Year Conditions

This condition includes analysis of traffic operations under Horizon Year conditions within a long-term period and is generally consistent with Year 2035. The horizon Year traffic volumes (ADT and AM and PM peak hour) have been estimated using the recently approved Fanita Ranch Traffic Impact Study (LLG 2020).

Horizon Year plus Project

This condition includes analysis of traffic operations under Horizon Year conditions with project traffic added to the Horizon Year ADT and AM and PM peak hour intersection traffic volumes. Based on review of the SANDAG land use and trip rate used in the General Plan Mobility Element for the traffic analysis zone (TAZ) the project is located within, it was noted that the project trip generation exceeded the TAZ trip generation for allowable light industrial use by approximately 33.6%. Therefore, to account for the additional project trip generation, approximately, 33.6% of the project traffic was added to the Horizon Year intersections and roadway segments. The Horizon Year intersection volumes were not available for the entire study area along Woodside Avenue. Therefore, to provide a conservative analysis, 100% of the project trips were assigned to the project driveways and intersections along Woodside Avenue near the project site. The traffic effects specific to the project under this condition were used as the basis for determining the project's long-term cumulative effects.

1.2 Project Description and Location

The proposed project includes the demolition of the existing drive-in theater and the construction of a 300,145 SF industrial/warehousing building as well as associated improvements including loading docks, trailer stalls, passenger vehicle parking spaces, and street, sidewalk, and landscape improvements. The building could be used for multiple tenants for warehousing and distribution, manufacturing, assembly, research and development, and related office uses. The project is located at 10990 Woodside Avenue in the City. The Assessor Parcel Number (APN) of the Project site is 381-070-5200. The City's General Plan Land Use Map designates the project site the entire site as Light Industrial.

Figure 1 illustrates the project's location. Regional access to the project site is available from SR-52 and SR-67 via Magnolia Avenue, Woodside Avenue, and Riverford Road. The Project would be accessed via a dedicated drive aisle on Woodside Avenue which leads to two 40-foot-wide driveways. These driveways and an on-site roadway would provide access to the vehicle parking lots and two truck courts. Vehicle parking for employees would be in parking lots along the periphery of the project site. The site plan of the proposed project is shown on Figure 2.

1.3 Analysis Methodology

1.3.1 Vehicle Miles Traveled Analysis for CEQA

On September 27, 2013, SB 743 was signed into law, which creates a process to change the way that transportation impacts are analyzed under CEQA. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Under the new transportation guidelines, LOS, or vehicle delay, will no longer be considered an environmental impact under CEQA. The updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. These guidelines identify VMT as the most appropriate measure of transportation impacts under CEQA and were required to be implemented on July 1, 2020.

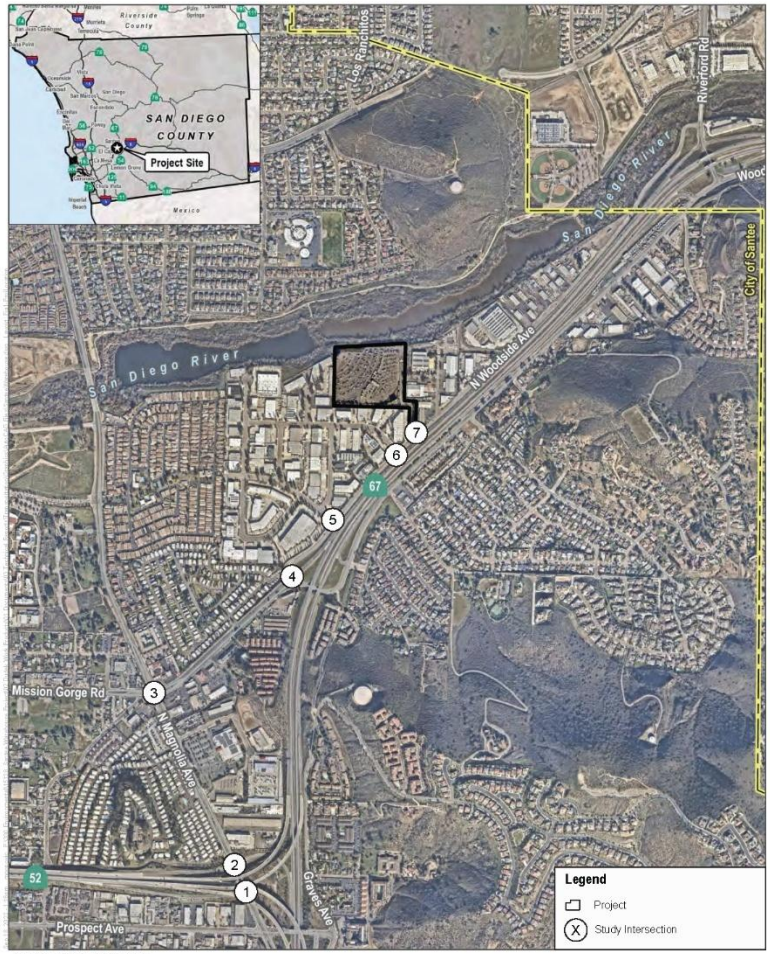
The requirements to prepare a detailed transportation VMT analysis apply to all discretionary land development projects that are not exempt from CEQA, except those that meet at least one of the transportation screening criteria. A project that meets at least one of the screening criteria below would be presumed to have a less than significant VMT impact due to project characteristics and/or location.

Per the City's TIA guidelines, for project's that do not screen out VMT should include analysis using the SANDAG Regional Travel Demand Model. The model outputs can be used to produce VMT/capita, VMT/employee, and Total VMT. For employment projects (Industrial/Non-industrial), the City's VMT guidelines the following criteria:

- **For projects that generate fewer than 2,400 daily unadjusted driveway trips:** Identify the location of the project on the City's VMT/employee map. The project's VMT/employee will be considered the same as the VMT/capita of the TAZ as shown on the VMT/employee map. Compare the project's VMT/employee to the threshold to determine if the impact is significant, or, if desired or requested by the City, input the project into the SANDAG Regional Travel Demand Model to determine the project's VMT/employee.
- **For projects that generate 2,400 or greater daily unadjusted driveway trips:** Larger projects will typically be analyzed using a custom model run by inputting the project into the SANDAG Regional Travel Demand Model. To perform the analysis, all project land uses should be inputted, and the VMT/employee should be determined using the same method/scripts that SANDAG utilizes to calculate the VMT/employee threshold. There may be some circumstances where the use of screening maps or other sketch modeling tools are appropriate for larger projects, especially if the project has the same characteristics of the land uses that are already contained in the TAZ where the project is located or if the project is unique in nature and project specific travel behavior information is available.

As shown in Section 2 Project Traffic, the project would generate less than 2,400 daily trips. As shown in Section 3.0, the project would not meet any VMT screening criteria, therefore, the project's VMT evaluation has been conducted using the SANDAG SB 743 VMT maps.

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SOURCE: SanGIS, Open Street Maps

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FIGURE 1
Project Location and Study Area
Palisade Santee Commerce Center Project

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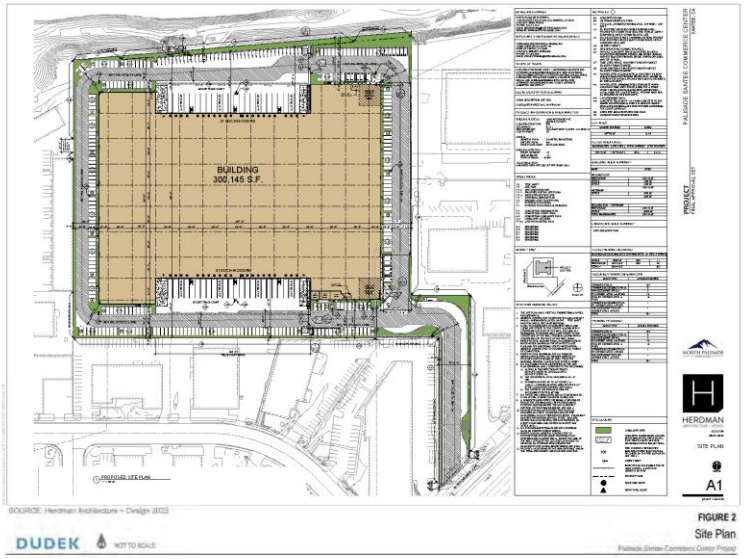


FIGURE 2
Site Plan

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1.3.2 Level of Service Analysis for Non-CEQA

In addition to a VMT analysis required under CEQA, the City determines the need for a transportation analysis in conformance with the land use and transportation elements of the General Plan. The City uses the criteria from the *Guidelines for Transportation Impact Studies in the San Diego Region* (May 2019).

Per the regional guidelines, a traffic analysis would be required if a project exceeds 500 ADT and is inconsistent with the adopted General Plan or exceeds 1,000 ADT and is consistent with the adopted General Plan.

As discussed in Section 2, the project is forecast to generate 1,440 passenger car equivalent [PCE] daily trips. Therefore, this study provides a traffic analysis discussing operations of selected roadway segments and intersections, under existing, near-term, and horizon year conditions.

LOS is commonly used as a qualitative description of intersection operations and roadway segments and is based on the design capacity of the intersection configuration and roadway facility, compared to the volume of traffic using the facility. The acceptable LOS for the City is LOS D.

1.3.2.1 Roadway Segments

Roadway segment analysis is based upon the comparison of ADT to the City of Santee Mobility Element Roadway Classification LOS and Standards Table. This table provides level of service thresholds for different street classifications, based on traffic volumes, and roadway characteristics. Table 1 presents guidance on the levels of ADT that can be accommodated on various types of roadways, based on level of service.

Table 1. City of Santee Roadway Classifications and Standards

Class	Lanes	Level of Service (LOS)				
		A	B	C	D	E
Prime Arterial	6	25,000	35,000	50,000	55,000	60,000
Major Arterial	4	15,000	21,000	30,000	35,000	40,000
Parkway	4	15,000	21,000	30,000	35,000	40,000
	2 lanes w/TWLTL	5,000	7,000	10,000	13,000	15,000
	2	4,000	5,500	7,500	9,000	10,000
Collector	2 lanes w/TWLTL	5,000	7,000	10,000	13,000	15,000
	2	2,500	3,500	5,000	6,500	8,000
	2	2,500	3,500	5,000	6,500	8,000
Non-Circulation Element						
Industrial Local	2	–	–	2,200*	–	–
Residential Local	2	–	–	2,200*	–	–
Cul-de-sac Street	2	–	–	300*	–	–
Hillside Street	2	–	–	700*	–	–

Source: City of Santee Mobility Element, Adopted by City Council October 25, 2017 (Resolution No. 114-2017)
Notes:
* Represents design capacity of non-CE road. LOS does not apply to non-CE roads.

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1.3.2.2 Intersections

The *Highway Capacity Manual, 6th Edition* (HCM 6) methodology (Transportation Research Board 2016) was used to analyze the operation of the signalized study intersections. The HCM analysis methodology describes the operation of an intersection using a range of LOS from LOS A (free-flow conditions) to LOS F (severely congested conditions), based on the corresponding control delay experienced per vehicle. The Synchro 11 LOS software was used to determine intersection LOS. Synchro is consistent with the HCM 6 methodology.

Table 2 shows the LOS values by delay ranges for unsignalized and signalized intersections under the HCM methodology.

Table 2. Levels of Service for Intersections using HCM Methodology

Level of Service	Unsignalized Intersections Control Delay (in seconds per vehicle)	Signalized Intersections Control Delay (in seconds per vehicle)
A	< 10.0	< 10.0
B	> 10.0 to < 15.0	> 10.0 to < 20.0
C	> 15.0 to < 25.0	> 20.0 to < 35.0
D	> 25.0 to < 35.0	> 35.0 to < 55.0
E	> 35.0 to < 50.0	> 55.0 to < 80.0
F	> 50.0	> 80.0

Source: HCM 6 (TRB 2016).

A queuing analysis using SimTraffic 11 software was conducted was conducted to determine the 95th percentile (design) queue and the average queue of the existing and proposed storage lanes at the N. Woodside Avenue/S. Woodside Avenue – SR-67 SB Off-Ramp intersection. The 95th percentile and average queues are then compared to the provided storage lane lengths to determine whether the queue can be adequately stored.

1.4 Need for Roadway Improvements and Mitigation Measures

Table 3 indicates when a project's effect on the roadway system is considered to justify the need for roadway improvements. That is, if a project's traffic effect causes the values in this table to be exceeded, roadway improvements should be considered.

Table 3. Determination of the Need for Roadway Improvements

	Allowable change Due to Project Effect				
	Freeways		Roadway Segments		Intersections
Level of Service with Project	V/C	Speed (mph)	V/C	Speed (mph)	Delay (Seconds)
LOS E and F	0.01	1	0.02	1	2

Source: Table 7-1 Determination of the Need for Roadway Improvements, Guidelines for San Diego Region. Guidelines for Transportation Impact Studies in the San Diego Region (May 2019).
Notes: V/C = Volume-to-Capacity, mph = miles per hour

The San Diego region guidelines state that not all improvement measures can feasibly consist of roadway widening (new lanes or new capacity). Therefore, financing toward a defined Intelligent Transportation System project, enhanced traffic signal communications project, or active transportation projects should be considered.

Additionally, per City of Santee Mobility Element Policy 2.1, "The City shall encourage an automobile Level of Service "D" on street segments and at intersections throughout the circulation network while also maintaining or improving the effectiveness of the non-automotive components of the circulation system (i.e. pedestrians, bicyclists, and public transit). The City may approve a lower automobile Level of Service if it finds that the effectiveness of non-automotive components of the circulation system would be maintain ed or improved as a result. In other cases, the City shall not approve any development that causes a drop in the level of service at a street segment or an intersection to LOS "E" or "F", after feasible mitigation, without overriding social, economic, or other benefits.

For impacts related to CEQA analysis, i.e., VMT analysis, mitigation measures may include Transportation Demand Management recommendations – transit facilities, bike facilities, telecommuting, rideshare programs, flex-time, carpool incentives, parking cash-out, complete or partial subsidization of transit passes, etc.

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2 Project Traffic

This section documents the trip generation, distribution, and assignment of project traffic in the study area. Due to discrepancies between industrial trip rates provided in SANDAG and ITE trip generation sources, the City allowed Dudek to conduct a Trip Generation Survey to determine the appropriate trip generation rates for the project. A trip generation survey of existing, similar industrial land uses was conducted to substantiate the use of trip rates from the current edition of the Institute of Transportation Engineers (ITE) Trip Generation, 11th Edition (2021). See Appendix A for details on the Trip Generation Survey and selection of ITE Industrial Park trip rate for the proposed project.

2.1 Trip Generation

Based on the driveway traffic count results, and the trip generation observed at all three industrial use sites (see Appendix A), the City approved the use of the ITE trip generation rate for the Industrial Park use (ITE Code 130) to estimate the project's daily, AM peak hour, and PM peak hour trip generation. The ITE daily trip rate (3.37 trips/TSF) is higher than Site 1 which had the highest surveyed empirical rate (3.15 trips/TSF). Additionally, to provide a conservative estimate of truck trips, the warehouse truck fleet mix from the South Coast Air Quality Management District's (SCAQMD) Warehouse Truck Trip Study Data Results and Usage (2014) was used to estimate project-related truck traffic. Based on the SCAQMD data, passenger cars would account for 72.5% trips of the total trips generated by a warehouse facility, and truck trips would account for approximately 27.5% of the total trips. The ITE and SCAQMD trip generation data are widely used for other industrial projects in southern California.

The total percentage of truck trips were further divided by 2-axle, 3-axle, and 4+ axle trucks per the SCAQMD study. These truck trips generated by the project are provided in passenger car equivalence (PCE) trips by using appropriate PCE factors. PCE factors consistent with the standard practice were used to estimate the total PCE trips for the project.

Using the trip rate for an Industrial Park contained in the ITE Trip Generation Manual, the project's daily, AM peak hour, and PM peak hour trips were estimated. As shown in Table 4, the proposed project would generate approximately 1,011 daily non-PCE trips, 102 AM peak hour trips (83 inbound and 19 outbound), and 103 PM peak hour trips (23 inbound and 80 outbound). Adjusting for PCE, the proposed project would generate approximately 1,440 daily PCE trips, 148 AM PCE peak hour trips (121 inbound and 27 outbound), and 146 PM PCE peak hour trips (30 inbound and 116 outbound).

2.2 Trip Distribution and Assignment

Project trip distribution percentages are based on logical travel paths to and from the project site, review of traffic studies conducted for nearby projects, and consideration of the traffic distribution patterns in the area. Figure 3 illustrates the proposed project trip distribution. As shown in the figure, approximately 80% of the passenger cars would west and 20% would travel east along Woodside Avenue from the project site. A majority of project-related trucks (approximately 90%) would travel west on Woodside Avenue to access the SR-52 ramps from Magnolia Avenue. The remaining 10% of project trucks would travel east on Woodside Avenue.

Based on the distribution percentage, Figures 4, 5, and 6 illustrate the project trip assignment for cars, trucks, and total trips (in PCE), respectively.

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Table 4. Project Trip Generation Summary

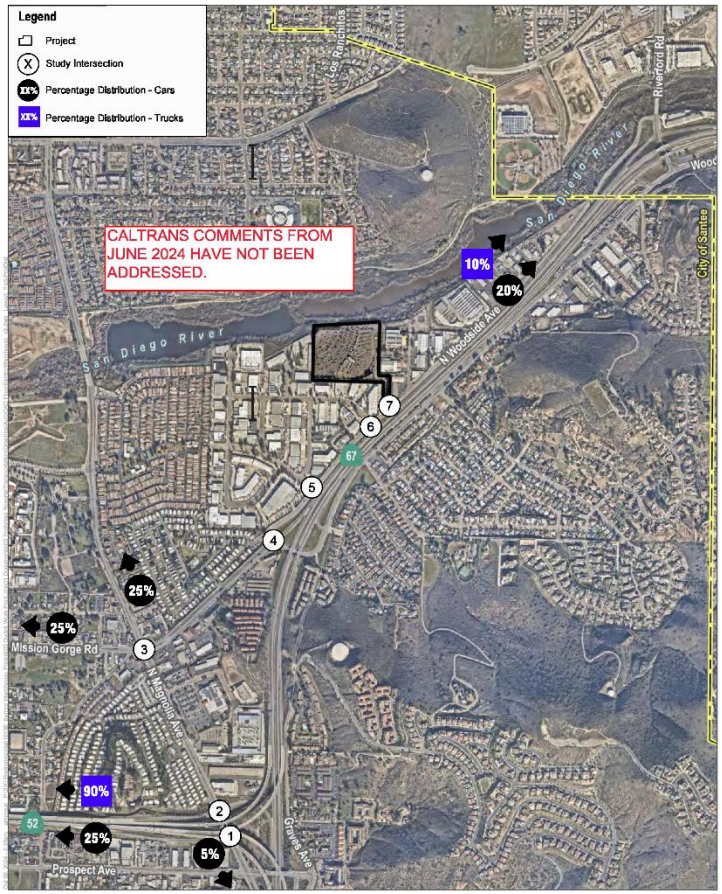
Land Use	Daily Trip Rate/Unit		AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Rates and Trip Generation								
Industrial Park1	3.37 trips/TSF		0.28	0.06	0.34	0.07	0.27	0.34
Land Use	**Units**	**Daily**						
Project (300.145 TSF)	**Total Trips (non-PCE)**	**1,011**	**83**	**19**	**102**	**23**	**80**	**103**
	Passenger Cars	*733*	*60*	*14*	*74*	*16*	*58*	*74*
	Trucks (non-PCE)	**278**	**24**	**5**	**29**	**6**	**23**	**29**
Trip Generation (Non-PCE)								
Vehicle Mix[2]	Passenger Cars (72.5%)	733	60	14	74	16	58	74
	2-axle Trucks (4.6%)	46	4	1	5	1	4	5
	3-axle Trucks (5.7%)	58	5	1	6	1	5	6
	4+axle Trucks (17.2%)	174	15	3	18	4	14	18
	Non - PCE Trips	**1,011**	**83**	**19**	**102**	**23**	**80**	**103**
Trip Generation (PCE)								
PCE Factor[3] and PCE Trips	Passenger Cars (72.5%)	733	60	14	74	16	58	74
	2-axle Trucks (4.6%)	70	6	1	7	1	6	7
	3-axle Trucks (5.7%)	115	10	2	12	2	10	12
	4+axle Trucks (17.2%)	522	45	9	54	11	42	53
	PCE Trips	**1,440**	**121**	**27**	**148**	**30**	**116**	**146**

Notes: TSF = thousand square feet, PCE = passenger car equivalent. Some of the totals may not match exactly due to rounding.

1 Trip rates from the ITE.

2 Vehicle Mix from the SCAQMD 2014

3 Passenger Car Equivalent (PCE) factors are assumed to be 1.0 for passenger vehicles, 1.5 for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4-axle trucks.



SOURCE: SanGIS, Open Street Maps

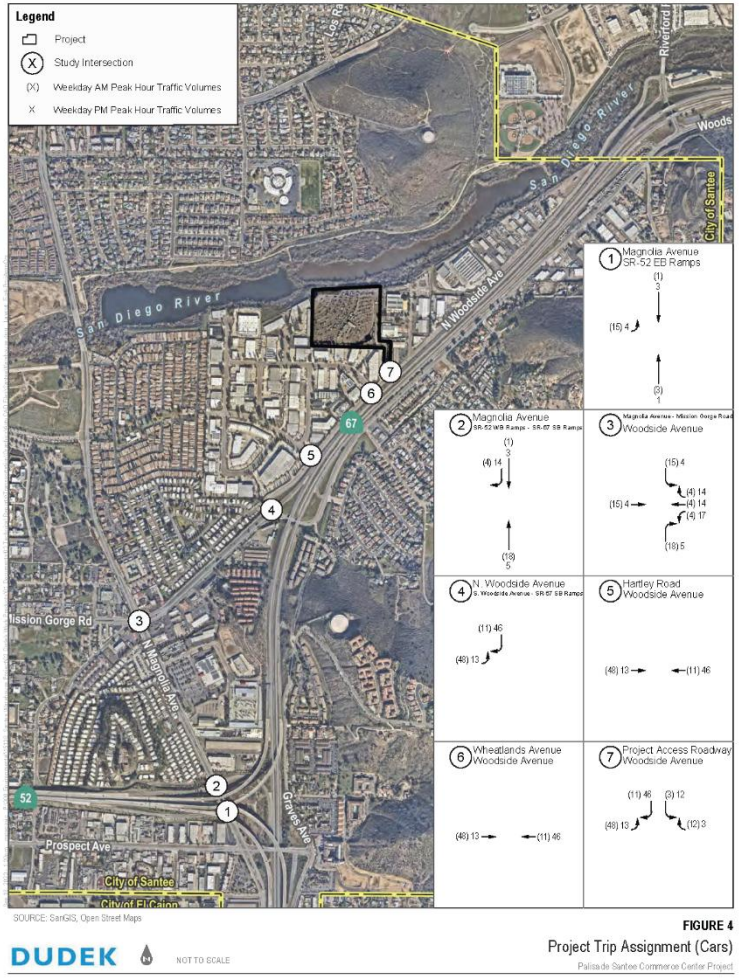
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FIGURE 3
Project Trip Distribution
Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps

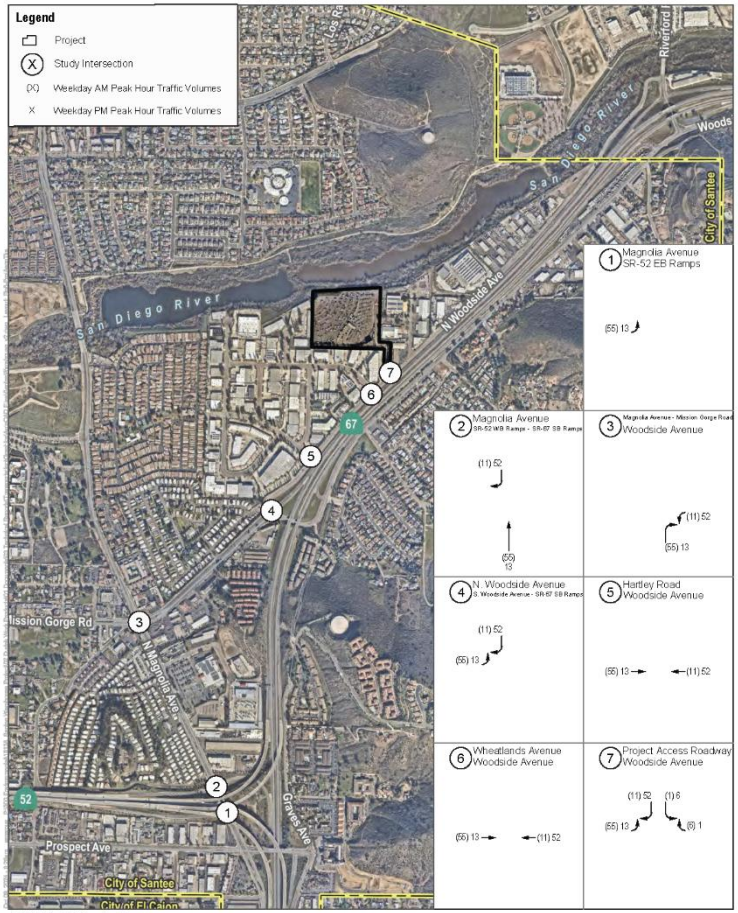
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FIGURE 4

Project Trip Assignment (Cars)

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps

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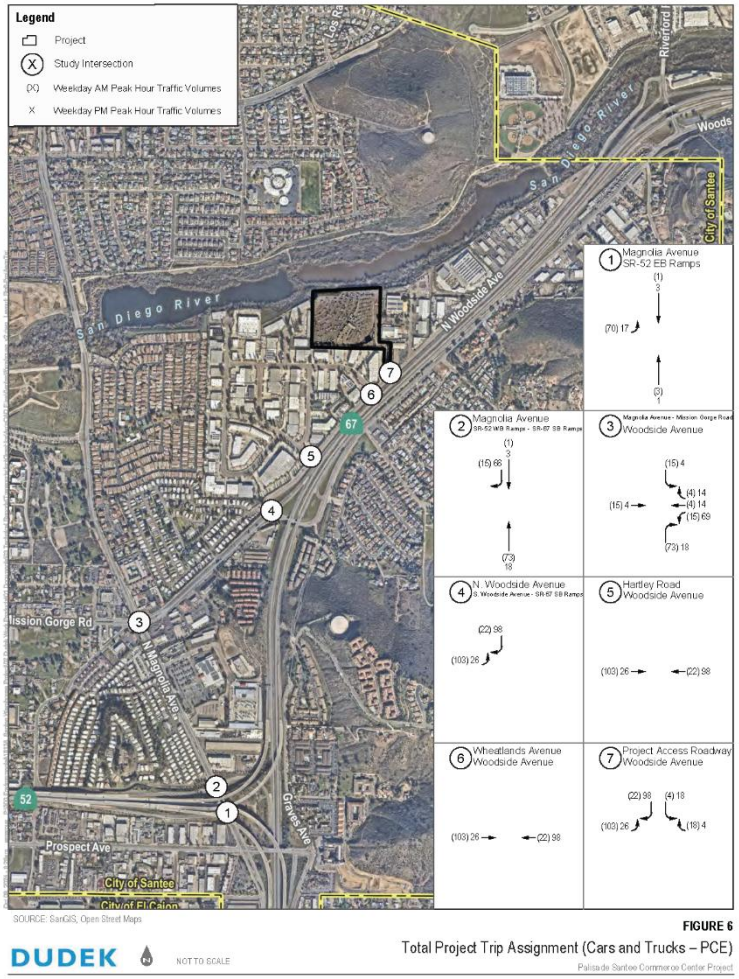
FIGURE 5

Project Trip Assignment (Trucks – PCE)

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps

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FIGURE 6

Total Project Trip Assignment (Cars and Trucks – PCE)

Palisade Santee Commerce Center Project

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3 Existing Conditions

Characteristics of the adjacent existing street system roadways within the study area are described below. The existing traffic controls and geometrics at the study area intersections are shown in Figure 7.

3.1 Roadway System

Regional access to the project would be provided by SR-52 and SR-67. Local access to the project would be provided by Magnolia Avenue and Mission Gorge Road-Woodside Avenue. Both of these roadways are designated truck routes within the City.

Roadways

Characteristics of the adjacent existing street system roadways within the study area are described below.

Woodside Avenue

Woodside Avenue is an east-west roadway from Magnolia Avenue (where Mission Gorge Road ends) to Chestnut Street in Lakeside. Between Magnolia Avenue and SR-67 southbound-off ramp-Woodside Avenue intersection, Woodside Avenue is a Major Arterial, with four lanes and a center-two-way-left-turn lane (TWLTL). There are Class II bike lanes are provided on both sides of Woodside Avenue. The posted speed limit is 45 miles per hour (MPH).

Woodside Avenue splits into N. Woodside Avenue and Woodside Avenue east of the intersection with the SR-67 southbound off-ramp with N. Woodside Avenue paralleling SR-67 on the north and Woodside Avenue paralleling SR-67 on the south. N. Woodside Avenue is the segment between the SR-67 southbound-off ramp-Woodside Avenue intersection to Riverford Road in the Lakeside community of San Diego, and is designated as a Collector Road with a TWLTL. It is currently constructed with one lane in each direction with a center TWLTL and dedicated left-turn lanes at its intersections with Harley Road and Wheatlands Avenue. North of Wheatlands Avenue, the roadway is one lane in each direction without a TWLTL or dedicated left-turn lanes at intersections. There are Class II bike lanes on both sides of the N. Woodside Avenue. On-street parking is permitted along north side of N. Woodside Avenue. There are intermittent sidewalks along the roadway. The posted speed limit in the vicinity of the project is 40 MPH.

Magnolia Avenue

Magnolia Avenue is a north-south roadway. It is classified as a Major Arterial north of Mission Gorge Road and Prime Arterial from Mission Gorge Road to Prospect Avenue. On-street parking is not permitted along the roadway from Mission Gorge Road to Prospect Avenue. There is paved sidewalk along Magnolia Avenue. The posted speed limit along the roadway is 45 miles per hour.

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3.2 Transit System

The San Diego Metropolitan Transit System (MTS) provides public transportation throughout Santee and northern San Diego County. Figure 8a illustrates the transit facilities in the vicinity of the proposed project. The nearest MTS bus routes serving the project are described below.

- Route 832 runs clockwise from Santee Town Center to northern Santee and back to Santee Town Center via Cuyamaca Street, and Magnolia Avenue. The route operates between 6:17am and 6:56pm on weekdays, with 30-minute headways, and between 8:25am and 4:45pm on weekends with 60-minute headways. The nearest bus stop is located west of the Magnolia Avenue and Mission Gorge Road – Woodside Avenue intersection, approximately 0.90 miles from the project site.
- Route 833 runs from the Santee Transit Center to the El Cajon Transit Center, via Mission Gorge Road, Magnolia Avenue, and Graves Avenue. The route operates between 5:52am and 6:12pm on weekdays, with 45-minute headways, and between 8:53am and 5:10pm on weekends, with 60-minute headways. The nearest bus stop is located west of Magnolia Avenue and Mission Gorge Road – Woodside Avenue intersection, approximately 0.90 miles from the project site.
- Route 834 runs in a loop, connecting the Santee Transit Center to the West Hills Parkway area, via Prospect Avenue and Carlton Oaks. The route operates only on weekdays from 6:33am to 3:30pm with 60-minuite headways. The nearest bus stop to the project site is approximately 2 miles away.

The City of Santee is served by the Green Line Trolley (Route 530), with the sole station within the City located at the Santee Transit Center. The Green Line connects Santee to the larger San Diego region and provides service into Downtown San Diego. The route operates from 5:00am to 1:00am with 15-minute headways on weekdays, and 30-minute headways on weekends. MTS ACCESS provides complementary, on-demand paratransit service to fulfill the unmet needs of residents such as seniors and persons with disabilities.

3.3 Pedestrian and Bicycle Facilities

The General Plan Circulation Element identifies the following bicycle facility classifications, as defined by Caltrans:

- **Class I Bikeway (Bike Path)** provide a completely separated right-of-way designated for the exclusive use of bicycles and pedestrians with crossflows by motor vehicles minimized.
- **Class II Bikeway (Bike Lane)** provides a striped lane designed for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited, but with pedestrian and motor vehicle crossflows permitted.
- **Class III Bikeway (Bike Route)** provides shared use of traffic lanes with cyclists and motor vehicles, identified by signage and street marking such as sharrows.
- **Class IV Bikeway (Cycle Track)** are separated bikeways that provide right-of-way designated exclusively for bicycle travel within the roadway and physically protected from vehicular traffic.

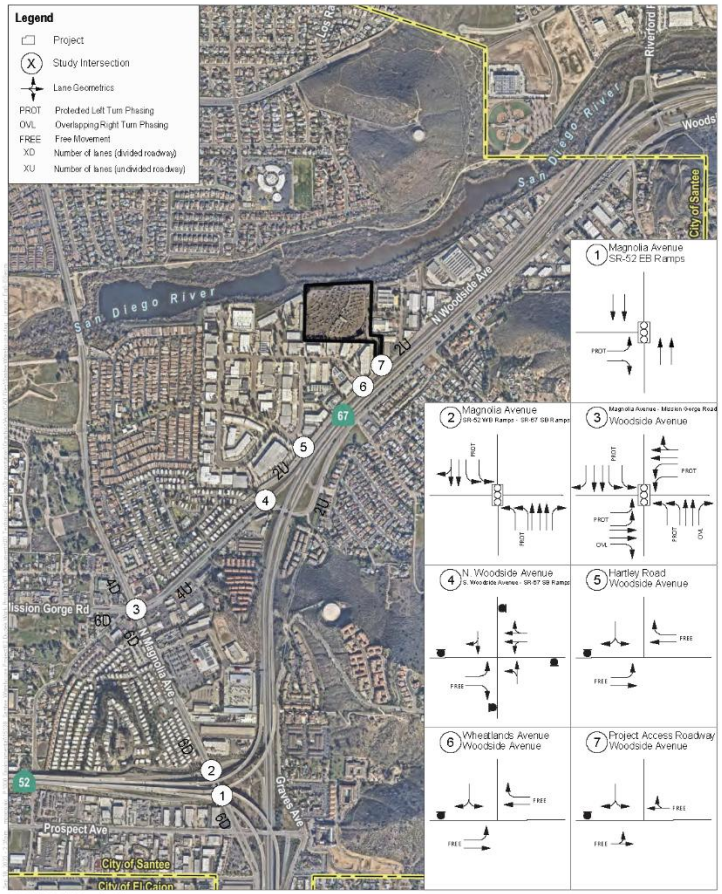
A Class II Bike Lane runs along Woodside Avenue; the bike lane along Woodside Avenue connects to bike route along Shadow Hill Road and Northcote Road, however, it does not connect to any other bicycle facility in the City. The Planned Bicycle Network in the Mobility Element is based on Active Santee Plan (2021). It recommends Class II bike lanes along Mission Gorge Road between Riverview Parkway and Magnolia Avenue and along Magnolia

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Avenue between Mast Boulevard and Mission Gorge Road. Figure 8b illustrates the existing and proposed bike facilities near the project.

Sidewalks and pedestrian facilities are provided along one side of Woodside Avenue, and adjacent roadways within one-half mile of the project site. While pedestrian facilities such are crosswalks are missing within the immediate project area, the Santee Active Transportation Plan has identified this area as in need and is committed to improve the area by installing missing segments of sidewalks, adding pedestrian ramps and crosswalks, and relocating utility facilities as needed.

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SOURCE: SanGIS, Open Street Maps

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FIGURE 7
Intersection Control and Geometrics
Palisade Santee Commerce Center Project

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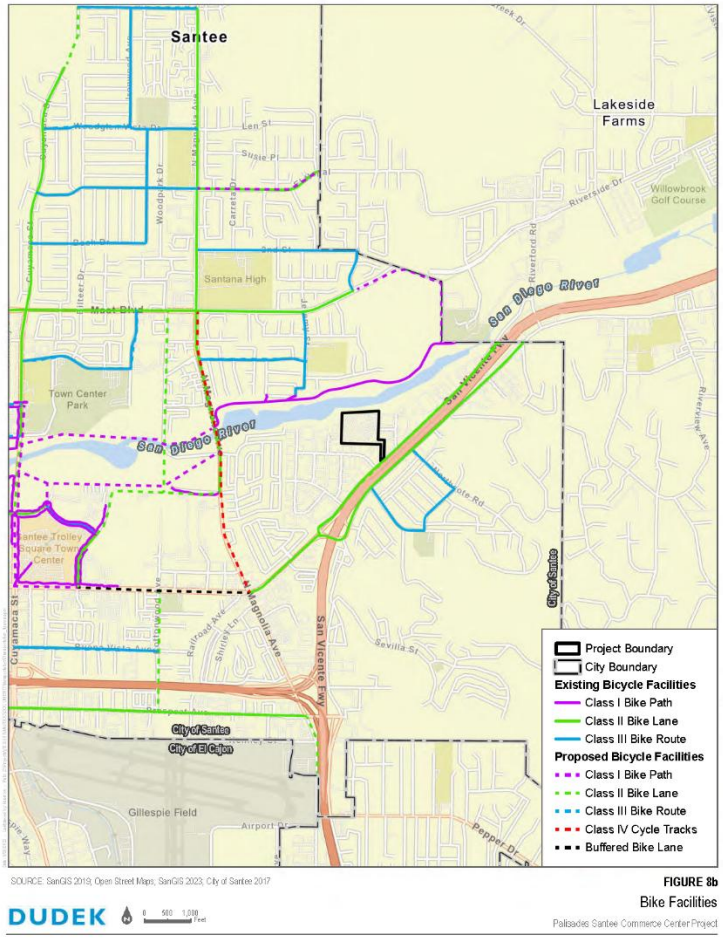
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SOURCE: SanGIS 2019; Open Street Maps, SanGIS 2023; City of Santee 2017

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FIGURE 8b
Bike Facilities
Palisades Santee Commerce Center Project

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4 Vehicle Miles Traveled

This section documents the VMT screening, analysis, and mitigation measures applicable to the project per City of Santee VMT Analysis Guidelines (April 13, 2022).

4.1 VMT Screening Analysis

The requirements to prepare a detailed transportation VMT analysis apply to all discretionary land development projects that are not exempt from CEQA, except those that meet at least one of the transportation screening criteria described below. A project that meets at least one of the screening criteria per City's VMT guidelines below would be presumed to have a less than significant VMT impact due to project characteristics and/or location.

Projects Located in a Transit-Accessible Area

Projects located within a half-mile radius of an existing major transit stop or an existing stop along a high quality transit corridor[1] may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. A map of existing major transit stops and existing stops along high-quality transit corridors is provided in Appendix D of the City's guidelines. The proposed project is not located within a half-mile radius of an existing transit priority area or an existing stop along a high-quality transit route, therefore it cannot be screened out using this criteria.

Small Projects

Projects generating 500 or fewer net new daily vehicle trips may be presumed to have a less-than significant impact absent substantial evidence to the contrary. Trips are based on 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. As shown in Section 2, the project would generate 1440 PCE daily trips, therefore would not be considered a small project and cannot be screened out using this criteria.

Local Serving Retail Projects

Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel. Local serving retail projects less than 50,000 square feet that are expected to draw approximately 75% of customers from the local area (roughly 3-miles) are presumed to have a less than significant impact absent substantial evidence to the contrary. Retail projects that are between 50,000 square feet and 125,000 square feet with similar customer attraction (approximately 75% from local area) may also be presumed locally-serving. The project does not propose retail uses, therefore it cannot be screened out using this criteria.

Local Serving Public Facilities

Public facilities that serve the surrounding community or public facilities that are passive use may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. Transit centers, public schools,

[1] Major transit stop: a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. High quality transit corridor: a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute periods.

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libraries, post offices, park-and-ride-lots, police and fire facilities, parks and trailheads, government offices, passive public uses and other public uses are considered local serving public facilities. The project does not propose local serving public facilities, therefore it cannot be screened out using this criteria.

Redevelopment Projects with Lower Total VMT

A redevelopment project may be presumed to have a less-than-significant impact absent substantial evidence to the contrary if the proposed project's total project VMT is less than the existing land use's total VMT and the CEQA action includes closing the existing land use. Although the project would redevelop an existing site, this criterion was not applied to the project.

Infill Affordable Housing

City of Santee presumes deed-restricted affordable housing projects that meet the following conditions meet the City's screening criteria and would not require a VMT analysis.

- Is an infill project (note that most of the City of Santee is presumed to be an infill location);
- Consists of a minimum of 52% affordable housing;
- Is within ½ mile radius of a transit stop or station; and
- Project-provided parking does not exceed parking required by the City's Municipal Code

The project does not propose infill affordable housing; therefore it cannot be screened out using this criteria.

Projects in a VMT-Efficient Area

A VMT-efficient area is any area within the City with an average VMT/capita or VMT/employee below the thresholds as compared to the baseline City/Regional VMT per capita for the TAZ that the project is located within. VMT efficient areas are accessed through SANDAG's SB743 VMT maps[2].

The project site is within Census Tract 166.07 under the current SANDAG Travel Demand model. Based on the San Diego Region SB743 VMT Maps and using City's criteria for evaluation of Industrial projects, the project is within a high-VMT generating area for VMT per employee (i.e., greater than or equal to the regional mean). Compared to the regional mean of 18.9 VMT per employee, the VMT per employee of the project's census tract is 22.2 VMT.

Therefore, it can be inferred that the proposed project is not located in a VMT-efficient area and would result in a significant VMT impact.

The significance threshold, project VMT, and mitigation measures are discussed below.

[2] San Diego Region SB 743 VMT Map accessed at San Diego Region SB743 VMT Maps (arcgis.com)

4.2 VMT Threshold of Significance

The significant thresholds and specific VMT metrics used to measure VMT are described by land use type below:

> **Industrial Employment projects** located within a VMT-efficient area may be presumed to have a less than-significant impact absent substantial evidence to the contrary. A VMT-efficient area for industrial employment projects is any area with an average VMT/employee at or below the baseline regional average for the TAZ that the project is located within.

4.3 Project VMT Analysis

Since the project's daily trip generation estimate would be below 2,400 average daily trips, and the project's census tract includes other employee-based uses, a project-specific model run by SANDAG would not be required. The results of the SANDAG SB 743 VMT maps have been used in the project's VMT analysis. Compared to the regional mean of 18.9 VMT per employee, the VMT per employee of the project's census tract is 22.2 VMT. Because the project's VMT is higher than the regional average of the census tract it is located within, the project would result in a significant VMT impact. Table 5 provides project's VMT summary. Figure 9 illustrates the SANDAG SB 743 VMT Map for the project site.

VMT Impacts, same as June 2024 review version

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Table 5. Project VMT Summary

Criteria	VMT/per Employee
Baseline Regional VMT/employee	18.9
VMT Threshold (at or below Baseline)	18.9
Project TAZ VMT/Employee	22.2
% Reduction Required	15%

Note: VMT = vehicle miles traveled

4.4 Cumulative VMT Impact

If a project is consistent with the assumptions in the SANDAG 2021 Regional Plan, the existing conditions project-level analysis is sufficient to determine cumulative impacts. If a project is not consistent with the assumptions in the SANDAG 2021 Regional Plan, a cumulative analysis may be necessary. A project effect on VMT under cumulative conditions would be considered significant if the cumulative VMT/capita or VMT/employee under the **future year "plus project" condition exceeds the base year thresholds (i.e.**, 18.9).

The project is consistent with the General Plan land use of the project site and would provide employment as proposed in the traffic analysis zone. The VMT/employee under Year 2035 or cumulative conditions is 20.1, which exceeds the existing threshold of 18.9 VMT per employee. Therefore, it can be concluded that the project would also result in a significant cumulative impact.

4.5 Mitigation Measures

To mitigate project's VMT impacts, the project applicant must reduce VMT, which can be done by either reducing the number of automobile trips generated by the project or by reducing the distance that people drive. The following strategies are available to achieve this:

1. Modify the project's built environment characteristics to reduce VMT generated by the project.
2. Implement TDM measures to reduce VMT generated by the project

Strategies that reduce single-occupant automobile trips or reduce travel distances are called Transportation Demand Management (TDM) strategies. The City VMT guidelines recommend using strategies from the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021) (GHG Reduction Handbook) and the SANDAG Mobility Management Guidebook/VMT Reduction Calculator Tool.

The following table includes TDM strategies from CAPCOA 2021 and their applicability to the project.

Table 6. Transportation Demand Management Measures

Trip Reduction Program	Description	Maximum Reduction Possible	Project Reduction Possible
T-5	Implement Commute Trip Reduction Program (CTR) (Voluntary): CTR programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.	4%	Assuming 100% employees are eligible for program, a 4% reduction can be achieved.
T-6	Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring) (Must include T-6 - T-10)	26%	Selected measures from T-6 to T-10 are included in this measure.
T-7	Implement Commute Trip Reduction Marketing: This measure will implement a marketing strategy to promote the project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.	4%	Assuming 100% employees are eligible for program, a **4%** reduction can be achieved by the project. See Appendix B for details on project VMT reduction.
T-8	Provide Ridesharing Program: This measure will implement a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied	8%	Assuming sub-urban location of the project, 100% employees are eligible for program, a **4%** reduction can be achieved by the project. See Appendix B for details on project VMT reduction.

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Table 6. Transportation Demand Management Measures

Trip Reduction Program	Description	Maximum Reduction Possible	Project Reduction Possible
	vehicle trips, thereby reducing the number of trips, VMT, and GHG emissions.		
T-9	Implement Subsidized or Discounted Transit Program: This measure will provide subsidized or discounted, or free transit passes for employees and/or residents. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and thus a reduction in GHG emissions.	5.5%	Assuming average transit fare of $2.50 would be subsidized and 100% of the employees would be eligible to participate in this program. Because 72.5% of the project trips are from employees, approximately 72.5% of project-generated VMT can be as assumed to be from employees. Based on the above inputs, a **0.74%** VMT reduction can be achieved by the project. See Appendix B for details on project VMT reduction.
T-10	Provide End of Trip Bicycle Facilities: This measure will install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions.	4.4%	For San Diego-Carlsbad area, a **0.57%** reduction can be achieved. See Appendix B for details on project VMT reduction.
T-11	Provide Employer-Sponsored Van pool: This measure will implement an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long-distance, single-occupied vehicles to shared vehicles reduces overall commute VMT, thereby reducing GHG emissions.	20.4%	It is likely that individual tenants may have employees that sign up with the SANDAG Sustainable Transportation Services program, formerly known as iCommute through ride-sharing program. Therefore, only T-8 has been included as reduction measure.
T-12	Price Workplace Parking: This measure will price on-site parking at workplaces. Because free employee parking is a common benefit, charging employees to park on site increases the cost of choosing to drive to work. This is expected to reduce single-occupancy vehicle commute trips, resulting in decreased VMT, thereby reducing associated GHG emissions.	20%	Not a suitable measure due to sub-urban project setting that provides few alternate transportation options for employees.

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Table 6. Transportation Demand Management Measures

Trip Reduction Program	Description	Maximum Reduction Possible	Project Reduction Possible
T-13	Implement Employee Parking Cash-Out: This measure will require project employers to offer employee parking cash-out. Cash-out is when employers provide employees with a choice of forgoing their current subsidized/free parking for a cash payment equivalent to or greater than the cost of the parking space. This encourages employees to use other modes of travel instead of single occupancy vehicles. This mode shift results in people driving less and thereby reduces VMT and GHG emissions.	12%	Not a suitable measure due to sub-urban project setting that provides few alternate transportation options for employees.
T-18	Provide Pedestrian Network Improvement:	6.4%	The project would add sidewalks along its access road from Woodside Avenue and at the Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection. This would result in approximately 0.6 miles from existing 0.4 mile of sidewalk between project driveway and the Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection. Based on the above inputs, a **2.51%** VMT reduction can be achieved by the project. See Section 8.3.3. for more details on proposed sidewalk improvement. See Appendix B for details on project VMT reduction.

Source: CAPCOA 2021 and Appendix B
Note: VMT = vehicle miles traveled

Based on the review of applicable trip reduction measures to the project, following measures as part of T-5 Commute Trip Reduction Program have been selected to calculate possible reduction:

T-5 Implement Commute Trip Reduction (CTR) Program to include the following measure and estimated project VMT reduction (in %):

- T-7 Implement Commute Trip Reduction Marketing (4%)
- T-8 Provide Ridesharing Program (4%)
- T-9 Implement Subsidized or Discounted Transit Program (0.74%)
- T-10 Provide End of Trip Bicycle Facilities (0.57%)
- T-18 Provide Pedestrian Network Improvements (2.51%)

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See Appendix B for calculation of project VMT reduction % corresponding to measures T-7, T-8, T-9, and T-10.

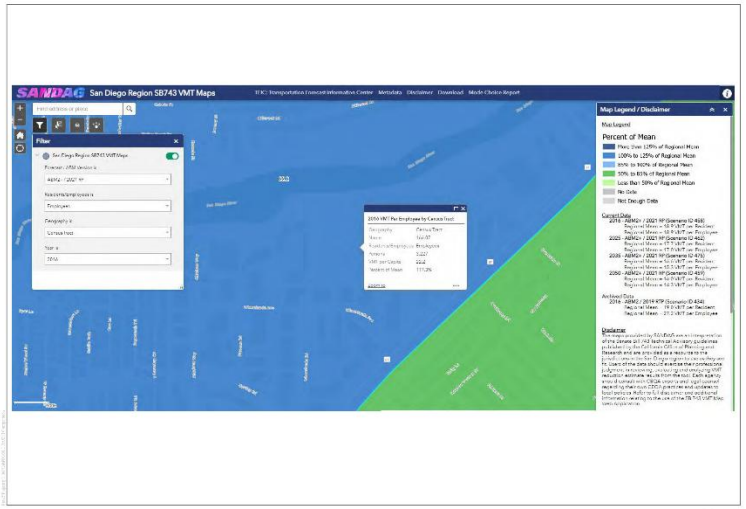
To calculate VMT reduction under each component, the following formula is used:

VMT Reduction% = 1 – [(1 – 4%) * (1 – 4%) * (1 – 0.74%) * (1 – 0.57%) * (1 – 2.51%)] = 11.3%

A VMT reduction of 11.3% would be achieved through the implementation of CTR measures. A reduction of 15% is required to reduce the VMT per employee to at or below regional level. As shown in Section 9, **MM-TRA-1 Trip Reduction Program** would be implemented by the project's tenants to reduce the project's VMT. Because the project's VMT would not be reduced to below significance threshold even with the implementation of **MM-TRA-1 and MM-TRA-2 Construction of Sidewalk** (see Chapter 9 below for details), the project's VMT impact would remain **significant and unavoidable**.

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FIGURE 9
SANDAG SB 743 Map
Palisades Santee Commerce Center Project

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5 Existing Traffic Conditions

This section details the traffic volumes and the roadway segment and intersection operations within the study area under Existing and Existing plus Project conditions.

5.1 Existing Traffic Volumes

Existing weekday peak hour turn movement counts at the study intersections and roadway segments were conducted in May 2023 during a typical non-holiday week while area schools were in-session. The traffic counts were collected for the AM (7:00 a.m. to 9:00 a.m.) and the PM (4:00 p.m. to 6:00 p.m.) peak periods and 24-hour average daily traffic conditions, for the study area intersections and roadway segments, respectively. The peak periods represent the highest volume of traffic for the adjacent street system. To provide a conservative analysis, existing PCE trips were used in the traffic analysis of the proposed project.

Raw traffic count worksheets are provided in Appendix C. Signal timing sheets for the signalized study intersections provided by Caltrans are included in Appendix D.

5.2 Existing Operations

5.2.1 Existing Roadway Operations

A roadway segment LOS analysis was prepared for the existing conditions using the roadway segment LOS methodologies as discussed in Section 1.3, Analysis Methodology. Table 7 shows the results of the existing conditions LOS analysis for the study roadway segments. As shown in the table, the study area roadway segments are currently operating LOS C or better under existing conditions.

Table 7. Existing Roadway Segment Analysis

No.	Roadway Segment	Capacity	Existing		
			ADT	V/C	LOS
1	Magnolia Avenue, south of Mission Gorge - Woodside Avenue	60,000	32,381	0.54	B
2	Woodside Avenue, between Magnolia Avenue and Woodside Avenue	40,000	27,134	0.68	C
3	N. Woodside Avenue, between Woodside Avenue to Project Driveway	10,000	3,725	0.37	A
4	Project Driveway, north of Woodside Avenue	2,200	117	NA	NA

Notes: ADT = Average daily traffic; V/C = Volumes to Capacity ratio; LOS = Level of Service; NA = Not Applicable because LOS does not apply to non-CE roads

1 Classification and LOS determined from City of Santee Mobility Element, Adopted by City Council October 25, 2017 (Resolution No. 114-2017)

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5.2.2 Existing Intersection Operations

The Existing (PCE) peak hour traffic volumes are shown in Figure 10.

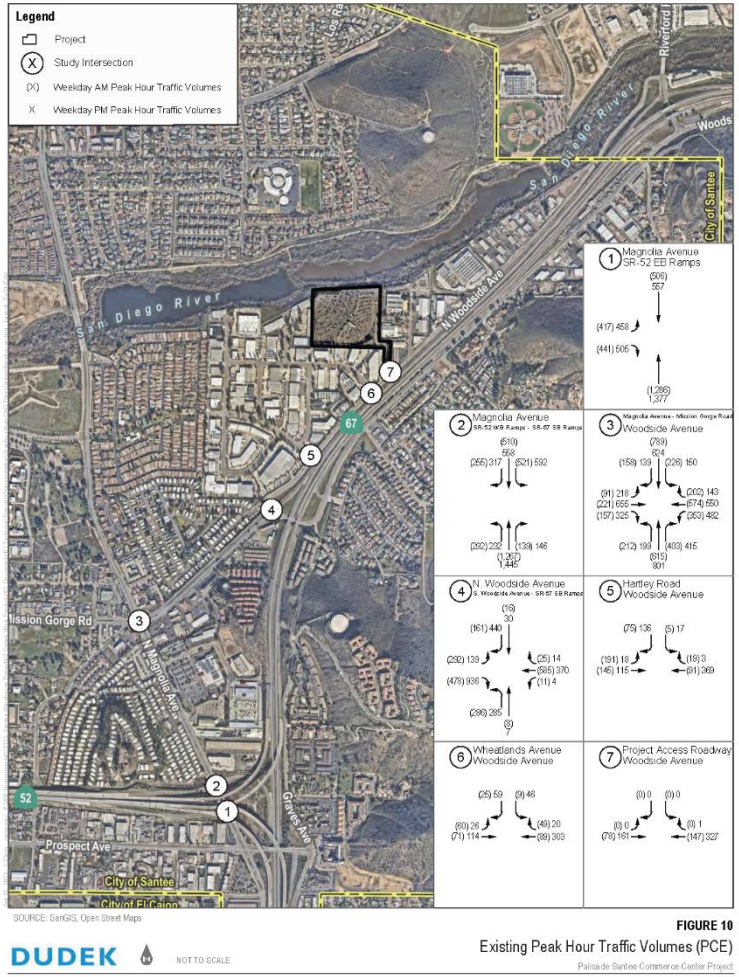
An intersection LOS analysis was prepared for the Existing conditions using HCM 6 methodology via the Synchro LOS software as discussed in Section 1.3. Table 8 shows the results of the Existing conditions analysis. LOS worksheets are provided in Appendix E.

As shown in the table, all intersections are currently operating with satisfactory levels of service (LOS D or better) under Existing conditions.

Table 8. Existing Peak Hour Intersection Level of Service

			Existing			
			AM Peak		PM Peak	
No.	Intersection	LOS Method	Delay[1]	LOS[2]	Delay[1]	LOS[2]
1	Magnolia Avenue/SR-52 EB Off-Ramps	HCM/ Signalized	21.1	C	23.1	C
2	Magnolia Avenue/SR-52 WB On-Ramp - SR-67 SB On-Ramp	HCM/ Signalized	11.2	B	10.8	B
3	Magnolia Avenue - Mission Gorge Road/Woodside Avenue	HCM/ Signalized	31.5	C	38.5	D
4	N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp	AWSC	22.7	C	23.3	C
5	Hartley Road/N. Woodside Avenue	TWSC	9.8	A	13.7	B
6	Wheatlands Avenue/N. Woodside Avenue	TWSC	9.6	A	12.7	B
7	Project Access Driveway/N. Woodside Avenue	TWSC	0.0	A	0.0	A

Notes: HCM = Highway Capacity Manual; X – Unsatisfactory operating conditions/LOS; AWSC – All-Way Stop Control; TWSC – Two-Way Stop Control
1 Delay in seconds per vehicle
2 Level of Service (LOS)



SOURCE: SanGIS, Open Street Maps

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FIGURE 10
Existing Peak Hour Traffic Volumes (PCE)
Palisade Santee Commerce Center Project

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5.3 Existing plus Project Traffic Operations

This section details the Existing plus Project traffic volumes and intersection operations within the study area.

The Existing plus Project traffic volumes were estimating by adding the appropriate percentage of average daily and peak hour project trips (shown in Table 4) to the existing traffic volumes for the study area roadway segments and intersections. Figure 11 illustrates the Existing plus Project Peak Hour Traffic Volumes.

5.3.1 Roadway Operations

A roadway segment LOS analysis was prepared for the Existing plus Project conditions using the roadway segment LOS methodologies as discussed in Section 1.3, Analysis Methodology. Table 9 shows the results of the Existing plus Project conditions LOS analysis for the study roadway segments. As shown in the table, the study area roadway segments of Woodside Avenue and Magnolia Avenue would continue to operate at LOS C or better under Existing plus Project conditions.

A project's traffic effect is determined if it exceeds the volume to capacity ratio by 0.02 or more at roadway segments operating at LOS E or F. Because the roadway segments operate at LOS C or better and not at LOS E or F, the proposed project would not exceed the City's criteria for project-specific traffic effect, which determines the needs for roadway improvements. Hence, no roadway improvements are proposed.

5.3.2 Intersection Operations

The total project trip assignments shown in Figure 6 were added to the Existing peak hour traffic volumes shown in Figure 10 to derive the Existing plus Project peak hour traffic condition. Figure 11 shows the Existing plus Project peak hour traffic volumes.

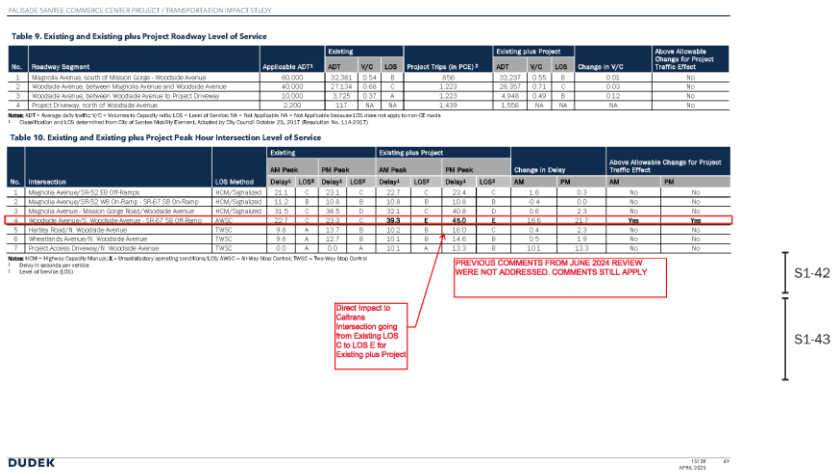
An intersection LOS analysis was prepared for the Existing plus Project condition using the HCM 6 methodology, and Table 10 summarizes the results of the Existing plus Project intersection analysis for the AM and PM peak hours. Detailed LOS calculation worksheets are included in Appendix E.

As shown in the table, with the exception of the Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection, all study area intersections would continue to operate at satisfactory levels of service (LOS D or better) under Existing plus Project conditions. The Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection would operate at LOS E in the AM and PM peak hour. The proposed project would increase the delay by more than 2 seconds at this intersection. Therefore, the proposed project would exceed the City's criteria for project-specific traffic effect under Existing plus Project conditions. See Section 8 for project-specific improvements.

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PALISADE SANTEE COMMERCE CENTER PROJECT / TRANSPORTATION IMPACT STUDY

Table 9. Existing and Existing plus Project Roadway Level of Service

No.	Roadway Segment	Applicable ADT[1]	Existing			Project Trips (in PCE)[2]	Existing plus Project			Change in V/C	Above Allowable Change for Project Traffic Effect
			ADT	V/C	LOS		ADT	V/C	LOS		
1	Magnolia Avenue, south of Mission Gorge - Woodside Avenue	60,000	32,381	0.54	B	856	33,237	0.55	B	0.01	No
2	Woodside Avenue, between Magnolia Avenue and Woodside Avenue	40,000	27,134	0.68	C	1,223	28,357	0.71	C	0.03	No
3	Woodside Avenue, between Woodside Avenue to Project Driveway	10,000	3,725	0.37	A	1,223	4,948	0.49	B	0.12	No
4	Project Driveway, north of Woodside Avenue	2,200	117	NA	NA	1,439	1,556	NA	NA	NA	No

Notes: ADT = Average daily traffic; V/C = Volume-to-Capacity ratio; LOS = Level of Service; NA = Not Applicable NA = Not Applicable because LOS does not apply to non-CE roads
1. Classification and LOS determined from City of Santee Mobility Element, Adopted by City Council October 25, 2017 (Resolution No. 114-2017).

Table 10. Existing and Existing plus Project Peak Hour Intersection Level of Service

No.	Intersection	LOS Method	Existing				Existing plus Project				Change in Delay		Above Allowable Change for Project Traffic Effect	
			AM Peak		PM Peak		AM Peak		PM Peak					
			Delay[1]	LOS[2]	Delay[1]	LOS[2]	Delay[1]	LOS[2]	Delay[1]	LOS[2]	AM	PM	AM	PM
1	Magnolia Avenue/SR-52 EB Off-Ramps	HCM/Signalized	21.1	C	23.1	C	22.7	C	23.4	C	1.6	0.3	No	No
2	Magnolia Avenue/SR-52 WB On-Ramp - SR-67 SB On-Ramp	HCM/Signalized	11.2	B	10.8	B	10.8	B	10.8	B	-0.4	0.0	No	No
3	Magnolia Avenue - Mission Gorge Road/Woodside Avenue	HCM/Signalized	31.5	C	38.5	D	32.1	C	40.8	D	0.6	2.3	No	No
4	Woodside Avenue/S. Woodside Avenue - SR-67 NB Off-Ramp	AWSC	22.7	C	23.3	C	**39.3**	**E**	**45.0**	**E**	16.6	21.7	**Yes**	**Yes**
5	Hartley Road/N. Woodside Avenue	TWSC	9.8	A	13.7	B	10.2	B	16.0	C	0.4	2.3	No	No
6	Wheeler Dr. Avenue/N. Woodside Avenue	TWSC	9.6	A	12.7	B	10.1	B	14.6	B	0.5	1.9	No	No
7	Project Access Driveway/N. Woodside Avenue	TWSC	0.0	A	0.0	A	10.1	A	13.3	B	10.1	13.3	No	No

Notes: HCM = Highway Capacity Manual; X = Oversaturatory operating conditions/LOS; AWSC = All-Way Stop Control; TWSC = Two-Way Stop Control
1. Delay in seconds per vehicle
2. Level of Service (LOS)

PREVIOUS COMMENTS FROM JUNE 2024 REVIEW WERE NOT ADDRESSED. COMMENTS STILL APPLY

Direct Impact to Caltrans Intersection going from Existing LOS C to LOS E for Existing plus Project

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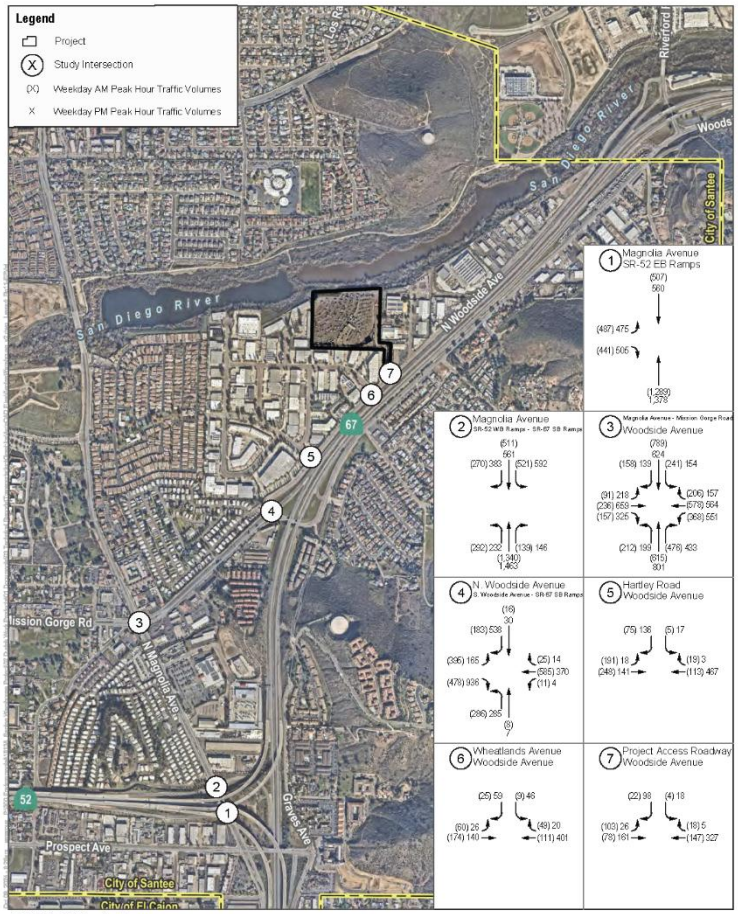
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SOURCE: SanGIS, Open Street Maps

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FIGURE 11

Existing plus Project Peak Hour Traffic Volumes (PCE)

Palisade Santee Commerce Center Project

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6 Near Term Conditions

This section presents the analysis of Near-Term traffic conditions when the project would be constructed and fully operational. The Near Term conditions are based on the addition of traffic from approved and pending projects added to the existing 2023 traffic volumes.

6.1 Cumulative Projects

The cumulative projects are projects that are proposed and in the review process, but not yet fully approved; or projects that have been approved, but not fully constructed or occupied. A review of cumulative projects list available at the City's website was conducted. Per discussion with the City, eight cumulative projects were identified that would potentially add traffic to the study area. In addition to these development projects, the SR-67/Riverford Road interchange improvements, a transportation project which would consolidate three intersections into two roundabouts on Riverford Road on both sides of SR-67, is proposed approximately one mile north of the project site. The project's study area does not include Riverford Road and its intersections with SR-67 because the project would not add 50 or more peak hour trips to those facilities. However, as shown in the State Route 67 and Riverford Road Intersection Control Evaluation Report, submitted to Caltrans in 2020, with the construction of proposed roundabouts, the closely spaced intersections of the SR-67 northbound off-ramp/Woodside Avenue, Woodside Avenue/Riverford Road, the and SR-67 southbound ramps/Riverford Road would operate at LOS D or better for all movements with no spillback onto SR-67 mainline. Therefore, the SR-67/Riverford Road interchange project will improve LOS and traffic operations in the vicinity of the project.

Figure 12 shows the locations of, and Table 11 provides a brief description of, the cumulative projects.

Table 11. Description of Cumulative Projects

No.	Cumulative Project	Location	Description
1	Southwest Signal Building	10756 Rockvill Street	20,000 SF industrial building
2	Lantern Crest Ridge II	11000 Sunset Trail	62-unit memory care facility
3	Habitat for Humanity Townhomes	8932 First Street	17-unit residential condominiums
4	Santee Auto Center	10335 Mission Gorge Road	Two-car dealerships, auto body shop, and car wash
5	Popeyes	10308 Mission Gorge Road	1,740 SF drive-through restaurant
6	Super Star Car Wash	8837 Magnolia Avenue	4,980 SF car wash tunnel
7	Extra Space Storage	10815 Woodside Avenue	88,390 SF (3-story) storage building
8	Hillside Meadows/Parkside	North and south of the western terminus of Mast Boulevard, and south of El Nopal, Lakeside 92040	143 residential units and two industrial lots
9	Riverford Road Interchange	SR-67 and Riverford Road in the unincorporated area of San Diego County within the Community of Lakeside and a portion in the City of Santee	Consolidate three intersections into two roundabouts along Riverford Road on either side of the SR-67

Source: City of Santee, 2024

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6.1.1 Trip Generation

The trip generation for the cumulative projects is shown in Table 12. As shown in the table, cumulative projects are forecast to generate approximately 7,612 daily trips, 518 AM peak hour trips, and 603 PM peak hour trips. Figure 12 also shows the cumulative project traffic volumes.

Table 12. Cumulative Projects Trip Generation Summary

No.	Cumulative Project	Land Use	Daily Trips	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
1	Southwest Signal Building[1]	Industrial	100	9	4	13	6	9	15
2	Lantern Crest Ridge II[2]	Residential	155	4	2	6	6	6	12
3	Habitat for Humanity Townhomes[1]	Residential	136	2	9	11	10	4	14
4	Santee Auto Center[3]	Service	3,336	135	61	196	110	144	254
5	Popeyes[1]	Service	1,218	66	44	110	26	25	51
6	Super Star Car Wash[1]	Auto	900	18	18	36	41	40	81
7	Extra Space Storage[1]	Industrial	177	6	5	11	8	8	16
8	Hillside Meadows[4]	DU	1,590	50	85	135	105	55	160
		Total Trip Generation	**7,612**	**290**	**228**	**518**	**312**	**291**	**603**

Notes:
1 Trip generation estimated using trip rates from SANDAG's Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002.
2 Trip generation updated to reflect revised unit numbers compared to the Lantern Crest Ridge II Senior Care Project, Traffic Impact Study, prepared by Darnell & Associates, April 30, 2018.
3 Trip generation from Traffic Impact Analysis for Santee Auto Center, prepared by LLG, April 20, 2023.
4 Trip generation from Traffic Impact Analysis for Hillside Meadows, prepared by LLG, September 6, 2000.

6.1.2 Trip Distribution and Assignment

Trip distributions and assignments for the cumulative projects were developed using the traffic study or assessment for these projects or by using professional judgment based on logical travel corridors. The trips generated by the cumulative projects were distributed and assigned through the study area network. Information on the cumulative projects regarding their trip generation and distribution is included in Appendix F.

6.2 Traffic Volumes

The Near-Term traffic volumes were estimating by adding the average daily and peak hour trips from the cumulative projects (shown in Table 12) to the existing traffic volumes for the study area roadway segments and intersections.

6.3 Near Term Operations

6.3.1 Near Term Roadway Operations

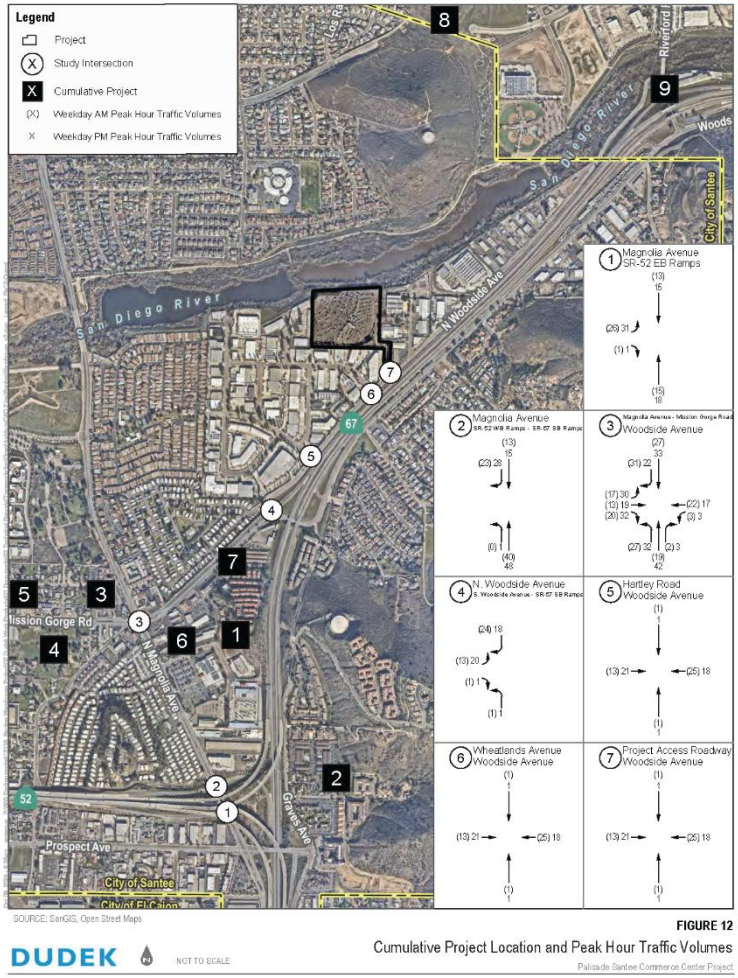
A roadway segment LOS analysis was prepared for the Near-Term conditions using the roadway segment LOS methodologies as discussed in Section 1.3, Analysis Methodology. Table 13 shows the results of the Near Term conditions LOS analysis for the study roadway segments. As shown in the table, the study area roadway segments of Woodside Avenue and Magnolia Avenue are estimated to operate at LOS C or better under Near Term conditions.

6.3.2 Near Term Intersection Operations

Near Term traffic volumes include existing traffic and traffic from the addition of cumulative projects (Figure 12) in the vicinity of the project. Figure 13 illustrates the Near Term (no project) traffic volumes for peak hour conditions.

An intersection LOS analysis was prepared for the Near Term conditions using HCM 6 methodology via the Synchro LOS software as discussed in Section 1.3. Table 14 shows the results of the Near-Term conditions analysis. LOS worksheets are provided in Appendix G. As shown in the table, all intersections would continue to operate at satisfactory levels of service (LOS D or better) under Near Term conditions.

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SOURCE: SanGIS, Open Street Maps

FIGURE 12

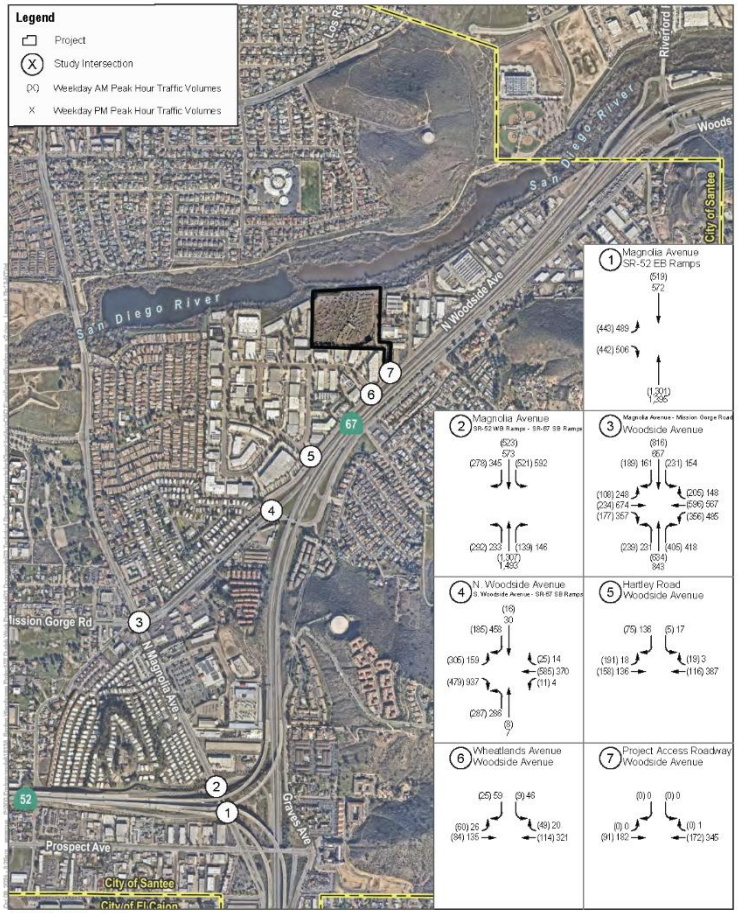
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Cumulative Project Location and Peak Hour Traffic Volumes

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps

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FIGURE 13

Near Term Peak Hour Traffic Volumes (PCE)

Palisade Santee Commerce Center Project

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6.4 Near Term plus Project Traffic Operations

This section details Near Term plus Project traffic volumes and intersection operations within the study area. The total project trip assignments shown in Figure 6 were added to the Near Term peak hour traffic volumes shown in Figure 13 to derive the Near Term plus Project peak hour traffic condition. Figure 14 shows the Near Term plus Project peak hour traffic volumes.

6.4.1 Roadway Operations

A roadway segment LOS analysis was prepared for the Near Term plus Project conditions using the roadway segment LOS methodologies as discussed in Section 1.3, Analysis Methodology. Table 13 shows the results of the Near Term plus Project conditions LOS analysis for the study area roadway segments. As shown in the table, the study area roadway segments of Woodside Avenue and Magnolia Avenue would continue to operate at LOS C or better under Near Term plus Project conditions.

A project's traffic effect is determined if it exceeds the volume to capacity ratio by 0.02 or more at roadway segments operating at LOS E or F. Because the roadway segments operate at LOS C or better and not at LOS E or F, the proposed project would not exceed the City's criteria for project-specific traffic effect, which determines the needs for roadway improvements. Hence, no roadway improvements are proposed.

6.4.2 Intersection Operations

An intersection LOS analysis was prepared for the Near Term plus Project condition using the HCM 6 methodology, and Table 14 summarizes the results of the Near Term plus Project intersection analysis for the AM and PM peak hours. Detailed LOS calculation worksheets are included in Appendix G.

As shown in the table, with the exception of the Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection, all study area intersections would continue to operate at satisfactory levels of service (LOS D or better) under Near Term plus Project conditions. The Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection would operate at LOS E in the AM peak hour and LOS F in the PM peak hour. The proposed project would increase the delay by more than 2 seconds at this intersection. Therefore, the proposed project would exceed the City's criteria for project-specific traffic effect under Near Term plus Project conditions. See Section 8 for project-specific improvements.

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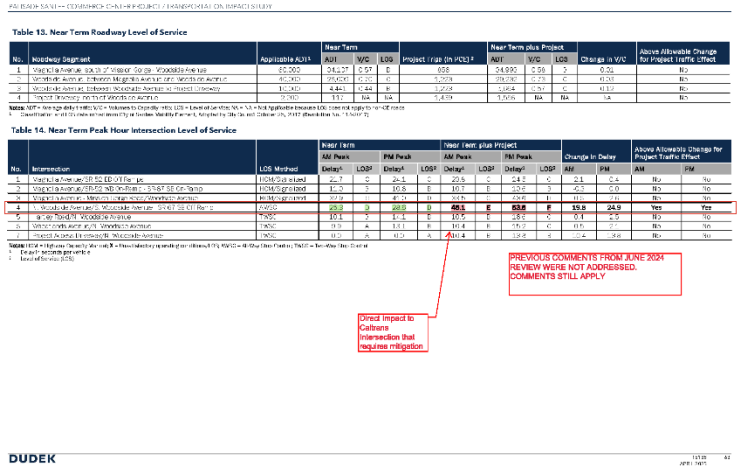


Table 13. Near Term Roadway Level of Service

No.	Roadway Segment	Applicable ADT[1]	Near Term			Project Trips (In PCE)[2]	Near Term plus Project			Change in V/C	Above Allowable Change for Project Traffic Effect
			ADT	V/C	LOS		ADT	V/C	LOS		
1	Virginia Avenue, south of Wagner Street - Woodside Avenue	37,500	34,127	0.91	E	658	34,993	0.93	E	0.02	No
2	Woodside Avenue, between Magnolia Avenue and Northside Avenue	40,000	29,000	0.73	C	5,928	29,780	0.75	C	0.02	No
3	Woodside Avenue, between Woodside Avenue and Project Driveway	10,000	4,441	0.44	B	1,228	5,669	0.57	C	0.13	No
4	Project Driveway and Woodside Avenue	0[3]	131	NA	NA	5,459	1,505	NA	NA	NA	No

Notes: ADT = Average daily traffic; V/C = Volume to Capacity ratio; LOS = Level of Service; NA = Not Applicable because LOS does not apply to no-ADT roads
1 Based on Table 1-1 of City's Mobility Element, Adopted by City Council on [illegible], 2022 (Resolution No. [illegible])

Table 14. Near Term Peak Hour Intersection Level of Service

No.	Intersection	LOS Method	Near Term				Near Term plus Project				Change in Delay		Above Allowable Change for Project Traffic Effect	
			AM Peak		PM Peak		AM Peak		PM Peak					
			Delay[4]	LOS[5]	Delay[4]	LOS[5]	Delay[4]	LOS[5]	Delay[4]	LOS[5]	AM	PM	AM	PM
1	Virginia Avenue/SR-52 EB Off Ramp	HCM/Signalized	21.7	C	24.1	C	22.5	C	24.5	C	0.8	0.4	No	No
2	Virginia Avenue/SR-52 WB On Ramp - Santee Commons Drive	HCM/Signalized	15.0	B	10.8	B	16.7	B	12.6	B	1.7	1.8	No	No
3	Virginia Avenue - Mayfield Village Apartments/Whitefield Avenue	HCM/Signalized	37.9	D	41.0	D	38.5	D	43.6	D	0.6	2.6	No	No
4	N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off Ramp	AWSC	29.3	D	28.9	D	45.1	E	53.8	F	15.8	24.9	Yes	Yes
5	Prospect Ave/SR-67 - Woodside Avenue	TWSC	10.1	B	11.1	B	10.5	B	11.5	B	0.4	0.4	No	No
6	West Hills Parkway/N. Woodside Avenue	TWSC	9.3	A	9.3	A	9.4	A	9.5	A	0.1	0.2	No	No
7	Mast Park Drive/N. Woodside Avenue	TWSC	8.9	A	8.9	A	9.1	A	9.2	A	0.2	0.3	No	No

Notes: HCM = Highway Capacity Manual; TWSC = Two-side stop-controlled intersection; AWSC = All-Way Stop Controlled; TWSC = Two-Way Stop Control
4 Delay in seconds per vehicle
5 Level of Service (LOS)

PREVIOUS COMMENTS FROM JUNE 2024 REVIEW WERE NOT ADDRESSED. COMMENTS STILL APPLY

Direct impact to Caltrans intersection that requires mitigation

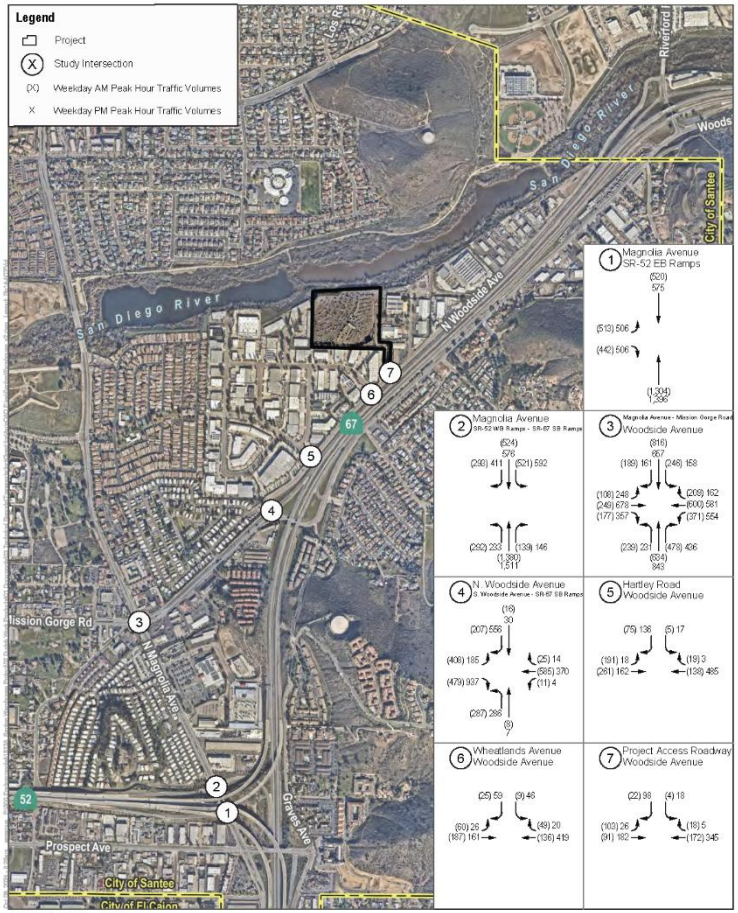
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SOURCE: SanGIS, Open Street Maps

FIGURE 14

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Near Term plus Project Peak Hour Traffic Volumes (PCE)

Palisade Santee Commerce Center Project

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7 Horizon Year Conditions

This section presents the analysis of Horizon Year traffic conditions when the project would be constructed and fully operational. The horizon year conditions are based on the year 2035 conditions that would exist in the study area.

7.1 Roadway Conditions

The roadway segment of Magnolia Avenue and Woodside Avenue are built out under existing conditions. Therefore, the capacity was assumed to be same as existing conditions. N. Woodside Avenue, between Woodside Avenue to Project Driveway was assumed to be improved to the standards of a Parkway (i.e., two lanes with a TWLTL). All intersection configurations, have been assumed to be preserved under the Horizon Year conditions, as shown in Figure 7. The Proposed Update to Existing Circulation Element Technical Report and Traffic Impact Study (July 2017) prepared for the City of Santee Mobility Element proposes a roundabout[3] at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection, in its Preferred Circulation Plan. However, per discussions with the City staff, the proposed roundabout has been removed from their Capital Improvement Program. Therefore, the existing stop control operation has been assumed at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection in the Horizon Year roadway conditions.

7.2 Traffic Volumes

The Horizon Year traffic volumes (ADT and AM and PM peak hour) have been estimated based on review of forecast traffic volumes in the Fanita Ranch Traffic Impact Study (LLG 2020). The Horizon Year intersection volumes were not available for the entire study area along Woodside Avenue, therefore, for Intersection 4 through 7, a growth factor was estimated by comparing the existing ADT with the horizon year ADT along Woodside Avenue near the project site. Figure 15 illustrates the Horizon Year traffic volumes for the peak hour conditions.

7.3 Horizon Year Operations

7.3.1 Roadway Operations

A roadway segment LOS analysis was prepared for the Horizon Year conditions using the roadway segment LOS methodologies as discussed in Section 1.3, Analysis Methodology. Table 15 shows the results of the Horizon Year conditions LOS analysis for the study roadway segments. As shown in the table, the study area roadway segments of Woodside Avenue between Magnolia Avenue and N. Woodside Avenue and between N. Woodside Avenue and Project Driveway would operate at LOS E under Horizon Year conditions.

7.3.2 Intersection Operations

Figure 15 illustrates the Horizon Year traffic volumes for peak hour conditions. An intersection LOS analysis was prepared for the Horizon Year conditions using HCM 6 methodology via the Synchro LOS software as discussed in

[3] Existing Circulation Element Technical Report and Traffic Impact Study (July 2017) pg. 159 "SR-67 Southbound Off-Ramp & Woodside Avenue - Convert this intersection to a roundabout with a northbound left-turn lane, a northbound right-turn bypass lane, an eastbound shared through/right-turn lane, and a westbound shared left/through-turn lane."

Section 1.3. Table 15 shows the results of the Horizon Year conditions analysis. LOS worksheets are provided in Appendix H.

As shown in the table, the Magnolia Avenue - Mission Gorge Road/Woodside Avenue intersection would operate at LOS E in the AM and PM peak hour conditions under Horizon year conditions. The Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection would operate at LOS F in the AM peak hour and LOS F in the PM peak hour. All other intersections operate at acceptable LOS conditions.

7.4 Horizon Year plus Project Operations

This condition includes analysis of traffic operations under Horizon Year conditions with project traffic added to the Horizon Year ADT and AM and PM peak hour intersection traffic volumes. Based on review of SANDAG land use and trip rate used in the General Plan Mobility Element for the traffic analysis zone (TAZ) the project is located within, it was noted that the project trip generation exceeded the TAZ trip generation for allowable light industrial use by 33.%. Therefore, to account for the additional project trip generation, approximately, 33.6% of the project traffic was added to the Horizon Year intersections and roadway segments. The Horizon Year intersection volumes were not available for the entire study area along Woodside Avenue, therefore, to provide a conservative analysis, a 100% of the project trips were assigned to the project driveways and intersections along Woodside Avenue near the project site. The traffic effects specific to the project under this condition were used as the basis for determining the project's long-term effects.

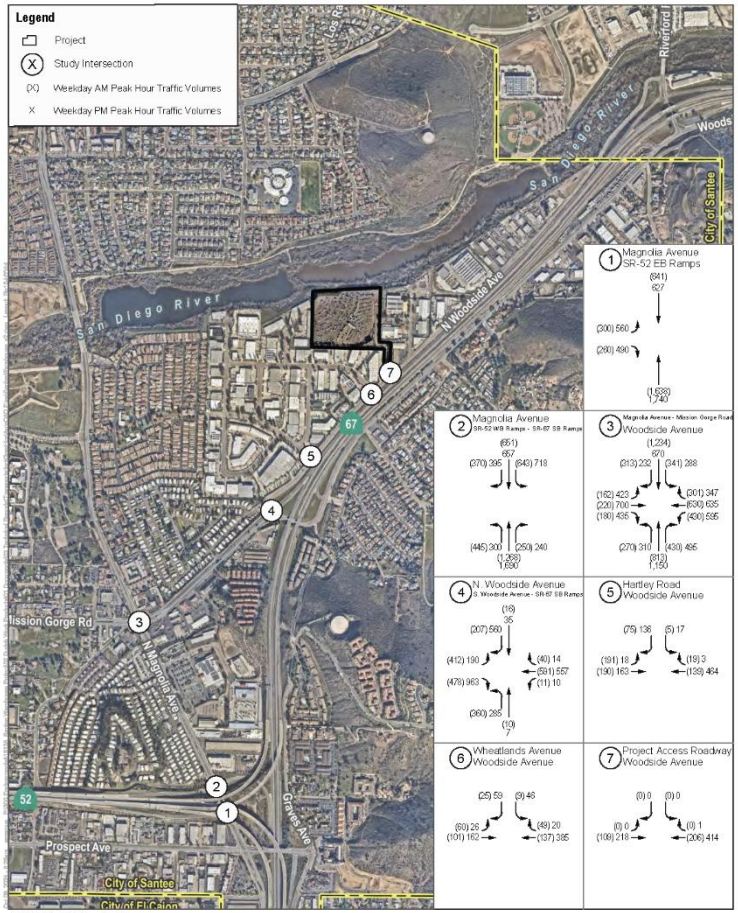
7.4.1 Roadway Operations

A roadway segment LOS analysis was prepared for the Horizon-Year conditions using the roadway segment LOS methodologies as discussed in Section 1.3, Analysis Methodology. Table 15 shows the results of the Horizon Year conditions LOS analysis for the study roadway segments. As shown in the table, the study area roadway segments of Woodside Avenue between Magnolia Avenue and N. Woodside Avenue and between N. Woodside Avenue and Project Driveway would operate at LOS E under Horizon Year plus conditions. Because the roadway segments operates at LOS E and the increase is greater than 0.02, the proposed project would exceed the City's criteria for project-specific traffic effect at the roadway segment of N. Woodside Avenue between Woodside Avenue and Project Driveway. Since the roadway segment is constructed at buildout classification per the City's Mobility Element, no further improvements to this roadway segment are recommended.

7.4.2 Intersection Operations

Figure 16 illustrates the Horizon Year traffic volumes for peak hour conditions. An intersection LOS analysis was prepared for the Horizon Year conditions using HCM 6 methodology via the Synchro LOS software as discussed in Section 1.3. Table 16 shows the results of the Horizon Year conditions analysis. LOS worksheets are provided in Appendix H.

As shown in the table, the Magnolia Avenue - Mission Gorge Road/Woodside Avenue intersection would operate at LOS E in the AM and PM peak hour conditions under Horizon year plus Project conditions. However, the proposed project would not increase the delay by more than 2 seconds and therefore, not exceed the City's criteria for project-specific traffic effect under Horizon Year plus Project conditions. No improvements are required. The Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection would operate at LOS F in the AM peak hour and PM peak hour conditions. The proposed project would increase the delay by more than 2 seconds at this intersection. Therefore, the proposed project would exceed the City's criteria for project-specific traffic effect under Horizon Year plus Project conditions. See Section 8 for project-specific improvements.



SOURCE: SanGIS, Open Street Maps

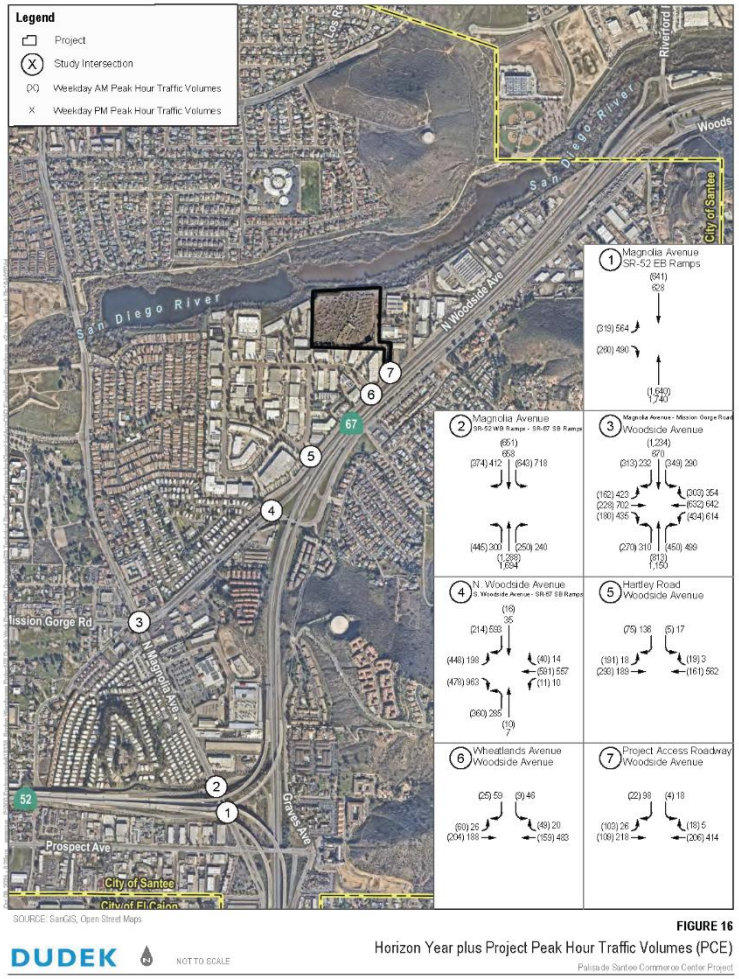
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FIGURE 15

Horizon Year Peak Hour Traffic Volumes (PCE)

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps

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FIGURE 16

Horizon Year plus Project Peak Hour Traffic Volumes (PCE)

Palisade Santee Commerce Center Project

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Table 15. Horizon Year Roadway Level of Service

No.	Roadway Segment	Applicable ADT[1]	Horizon Year			Project Trips (in PCE) [2]	Horizon Year plus Project			Change in V/C	Above Allowable Change for Project Traffic Effect
			ADT	V/C	LOS		ADT	V/C	LOS		
1	Magnolia Avenue, south of Mission Gorge - Woodside Avenue	60,000	36,950	0.62	C	288	37,238	0.62	C	0.00	No
2	Woodside Avenue, between Magnolia Avenue and N. Woodside Avenue	40,000	36,600	0.92	E	411	37,011	0.93	E	0.01	**No**
3	N. Woodside Avenue, between Woodside Avenue to Project Driveway	15,000	13,000	0.87	E	411	13,411	0.89	E	0.02	**Yes**
4	Project Driveway, north of Woodside Avenue	2,200	117	--	--	1,439	1,556	--	--	--	No

Notes: ADT = Average daily traffic; V/C = Volumes to Capacity ratio; LOS = Level of Service; NA = Not Applicable NA = Not Applicable because LOS does not apply to non-CE roads
1 Classification and LOS determined from City of Santee Mobility Element, Adopted by City Council October 25, 2017 (Resolution No. 114-2017)

Table 16. Horizon Year Peak Hour Intersection Level of Service

No.	Intersection	LOS Method	Horizon Year				Horizon Year plus Project				Change in Delay		Above Allowable Change for Project Traffic Effect	
			AM Peak		PM Peak		AM Peak		PM Peak					
			Delay[A]	LOS[B]	Delay[A]	LOS[B]	Delay[A]	LOS[B]	Delay[A]	LOS[B]	AM	PM	AM	PM
1	Magnolia Avenue/SR52 EB Off-Ramps	HCM/Signalized	13.3	B	44.0	D	14.1	B	44.3	D	0.8	0.3	No	No
2	Magnolia Avenue/SR52 WB On-Ramp - SR67 SB On-Ramp	HCM/Signalized	8.3	A	9.6	A	8.3	A	9.6	A	0.0	0.0	No	No
3	Magnolia Avenue - Mission Gorge Road/Woodside Avenue	HCM/Signalized	**59.4**	**E**	**64.0**	**E**	**59.7**	**E**	**65.5**	**E**	**0.3**	**1.5**	**No**	**No**
4	N. Woodside Avenue/S. Woodside Avenue - SR67 SB Off-Ramp	AWSC	62.9	F	70.1	F	76.4	F	84.2		13.5	14.1	Yes	Yes
5	Hartley Road/N. Woodside Avenue	TWSC	10.2	B	16.0	C	10.7	B	49.2	C	0.5	3.2	No	No
6	Wheatlands Avenue/N. Woodside Avenue	TWSC	9.9	A	14.8	B	10.4	B	17.0	C	0.5	2.2	No	No
7	Project Access Driveway/N. Woodside Avenue	TWSC	0.0	A	0.0	A	10.8	B	15.6	B	10.8	15.6	No	No

Notes: HCM = Highway Capacity Manual; **X** = Unsatisfactory operating conditions/LOS; AWSC = All-Way Stop Control; TWSC = Two-Way Stop Control
A Delay in seconds per vehicle
B Level of Service (LOS)

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8 Project Access, On-Site Circulation and Improvement Measures

This section documents the project access evaluation to provide an eastbound left-turn lane along Woodside Avenue. The section also provides improvement measure for the N. Woodside Avenue/S. Woodside Avenue – SR-67 SB Off-Ramp intersection.

8.1 Project Access Evaluation

As mentioned in Section 1, the access to the proposed project would be from N. Woodside Avenue via the project access driveway (Intersection 7). Per City's request, an evaluation for eastbound left turn lane at this access driveway was conducted. The left-turn lane evaluation was conducted using the methodology from the American Association of State Highway Transportation Officials' (AASHTO, 2018) – Geometric Design of Highways and Streets ("Green Book"). Per Section 9.7.3 Design Treatments for Left-Turn Maneuvers, 9.7.3.1 Guidelines for Providing and Design of Left-Turn and Bypass Lanes, many factors enter into the choice of type of intersection and the extent of design of a given type, but the principal controls are the design-hour traffic volume, the character or composition of traffic, and the design speed. The character of traffic and design speed affects many details of design, but in choosing the type of intersection they are not as significant as the traffic volume. Of particular significance are the actual and relative volumes of traffic involved in various turning and through movements.

Traffic-volume-based guidelines for where left-turn lanes should be provided are presented in Table 9-24 and Figure 9-35 for arterials in urban areas (see Appendix I). This table and figure are applicable at unsignalized intersection with streets and driveways where the major road is uncontrolled and the minor-road approaches are stop- or yield-controlled.

Additionally, the HCM indicates that exclusive left-turn lanes should be considered where left-turn volumes exceed 100 vehicles/hour (veh/hr). As shown on Figures 5 and 6, during the AM peak hour, there are approximately 109 eastbound left turn vehicles from N. Woodside Avenue into the project site. Of the total 103 vehicles, 55 vehicles (in PCE) or 53% are trucks. Because the left-turning volumes at the exceed the AASHTO suggested left-tun lane guidance of 50 or more veh/hr (see Appendix I) and HCM guidance of 100 veh/hr and due to high truck volume, it is recommended that a dedicated eastbound left turn lane be constructed at the Project Access Driveway/Woodside Avenue.

8.2 On-Site Circulation and Parking

On-site circulation and access to the project will be provided by a circuitous roadway (see Figure 2) that would also serve as fire lane. The width of the internal roadway is between 30 feet to 40 feet. The on-site driveway will be designed per City's Standard Drawings and requirements of the Fire Code to provide turn radii for fire truck and apparatus to access all parts of the site.

The parking ratio used to calculate on-site parking requirements is consistent with the Section 13.24.040 Parking requirements of the City of Santee Municipal Code[4]. Per code, for industrial uses that include warehousing and

[4] City of Santee. https://library.qcode.us/lib/santee_ca/pub/municipal_code/item/title_13-chapter_13_24-13_24_040

distribution, one parking space for 1,000 square feet of gross floor area should be provided. The project would require and proposes a total of 301 parking spaces for 301,445 square feet of industrial space.

Parking designated for electric vehicles (EV), including spaces associated with clean air vehicles have been provided per code requirement. Long-term and short-term bicycle parking[5] would be provided per City's code requirement.

As such, the project would provide adequate parking spaces.

8.3 Improvement Measures

8.3.1 Project Access Driveway/N Woodside Avenue

The following improvement measures would be constructed by the project to improve traffic flow near the project site:

- The project would construct a dedicated eastbound left turn lane at the Project Access Driveway/ Woodside Avenue.
- The project access driveway will be designed per City specifications for commercial driveway per City of Santee standard PW-21[6].
- The project would be responsible for constructing frontage improvements including sidewalks along the northern side of N. Woodside Avenue and connect to the existing sidewalk along N. Woodside Avenue that lies to the west of the project's driveway. No sidewalk exists to the east and accordingly no new sidewalk is required to be constructed.
- The project would also install a crosswalk to improve pedestrian circulation at the Project Access Driveway/N. Woodside Avenue.

8.3.2 N. Woodside Avenue Roadway Segment

Although the roadway segment of N. Woodside Avenue near Project Driveway is forecast to operate at LOS E, as shown in Section 7, with the frontage and project access improvements described above, the operation of the Project Access Driveway/N. Woodside Avenue would facilitate traffic flow and truck turn movement along Woodside Avenue near the project site. Since the roadway segment is constructed at buildout classification per the City's Mobility Element, no further improvements to this roadway segment are recommended.

5 Bicycles. All commercial and office areas shall provide adequate locking facilities for bicycle parking at any location convenient to the facility for which they are designated. Whenever possible, weatherproofing or facility covering should be used.
Short-Term Bicycle Parking. If the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for five percent of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack.
Long-Term Bicycle Parking. For buildings with over 10 tenant-occupants, provide secure bicycle parking for five percent of motorized vehicle parking capacity, with a minimum of one space. Acceptable parking facilities shall be convenient from the street and may include:
i. Covered, lockable enclosures with permanently anchored racks for bicycles;
ii. Lockable bicycle rooms with permanently anchored racks; and
iii. Lockable, permanently anchored bicycle lockers.

6 City of Santee. https://www.cityofsanteeca.gov/home/showpublisheddocument/18044/637048465192800000

8.3.3 N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp Intersection

The proposed project would result in a traffic effect at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection, under Existing plus Project, Near Term plus Project conditions, and Horizon Year plus Project conditions.

Based on the Proposed Update to Existing Circulation Element Technical Report and Traffic Impact Study (July 2017) prepared for the City of Santee Mobility Element, a roundabout is proposed at this intersection in its Preferred Circulation Plan. However, per discussions with the City staff, the proposed roundabout has been removed from the City's Capital Improvement Program. Therefore, the roundabout is not considered to be a feasible improvement for this intersection. Furthermore, Caltrans would not accept any lane addition (such as a dedicated right turn lane along N. Woodside Avenue adjacent to the current shared through-right turn lane) at this intersection, Therefore, no improvements to intersection lane geometry or control can be recommended at this time.

Based on discussions with the City staff, the project would construct a missing segment of sidewalk along N. Woodside Avenue near the N. Woodside Avenue/Woodside Avenue - SR-67 SB Off-Ramp intersection and near the project driveway, for a total of 990 linear feet or approximately 0.2 miles. The project would also be responsible for pavement rehabilitation and restriping of N. Woodside Avenue to the satisfaction of the City Engineer from Caltrans right-of-way at the intersection of the SR-67 to the easternmost edge of the project driveway's intersection with N. Woodside Avenue. In addition, the project would install approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk. Although this improvement would not reduce delay or improve LOS at the Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection, it would improve non-vehicular circulation and pavement conditions along Woodside Avenue and would be considered an acceptable improvement by the City in lieu of improving delay or LOS.

A conceptual exhibit prepared by the applicant illustrating the proposed sidewalk and pavement rehabilitation at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection is included in Appendix J.

Per City's request, an intersection lane queuing analysis was also conducted for informational purposes and is summarized in Section 8.3.4.

8.3.4 N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp Intersection Queuing Analysis

An intersection lane queuing analysis, using SimTraffic 11 software, was conducted to determine the 95th percentile (design) queue of the existing storage lanes at the N. Woodside Avenue/ Woodside Avenue – SR-67 SB Off-Ramp intersection. The intersection's queues were calculated for the Existing, and Existing plus Project= = conditions. To account for actual vehicular volume with mix of traffic (cars and trucks) observed in the field, queuing analysis was conducted using non-PCE traffic volumes and heavy vehicle percentage for each turn movement. It should be noted that nominal pedestrian and bicycle activity was observed at this intersection as shown in Appendix C, Traffic Counts. The SimTraffic queuing reports and non-PCE peak hour intersection volumes, heavy vehicle percentages are provided in Appendix K.

This analysis determined whether potential queuing and spillback would impact the SR-67 mainline as well as Woodside Avenue. The geometric configuration of the intersection was assumed to be the same under Existing conditions without the project and with Project conditions,

Intersection Queuing Analysis

Tables 17 summarize the 95th percentile queuing analysis conducted for the intersection under Existing and Near-Term conditions. The 95th percentile (design) queue is the maximum queue that would only occur during a smaller portion of the peak hour and the analysis is provided for informational purposes.

As shown in Table 17, under Existing conditions, there are no movements where the 95th percentile queues would exceed their storage lengths during the weekday AM or weekday PM peak hours. Under Existing plus Project conditions, all movements would experience an increase in vehicular queues however, most queues would be accommodated in the storage length available. except for the eastbound left turn lane (during AM peak hour).

For the eastbound left turn lane queue, it should be noted that while the next intersection to the west, the entrance to the Mission Del Magnolia mobile home community, is approximately 820 feet away, there is still adequate length available along Woodside Avenue for vehicles to queue in the AM peak hour. The queue is likely to exceed 850 feet or one car length, as shown in Table 17, only 5 percent of the time during the AM peak hour. On an average, this queue length would be approximately 434 feet (see Appendix K). It should be noted that there is no specific criteria for assessing queuing impacts. However, it is recommended that "KEEP CLEAR" pavement markings be installed west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue.

Caltrans Off-Ramp Queues

Additionally, it should be noted that under Existing and Existing plus Project conditions analyzed, the westbound turn movements at the SR-67 off-ramp do not exceed the storage length available. The analysis indicates there are currently no queuing issues that may potentially spill back onto the SR-67 mainline.

Table 17. Queuing Summary for Existing Conditions (95th Percentile Queue)

Intersection	Movement	Storage Length[1]	Existing (w/o improvement)				Existing plus Project			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
			95th percentile Queue[2]	Exceeds Storage Length	Queue[2]	Exceeds Storage Length	Queue[2]	Exceeds Storage Length	Queue[2]	Exceeds Storage Length
N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp	EBL[3]	820	208	No	410	No	850	Yes	257	No
	EBR[3]	820	49	No	822	No	474	No	640	No
	WBLT[4]	775	352	No	108	No	356	No	124	No
	WBTR	265	245	No	69	No	278	No	77	No
	NBLT[3]	725	259	No	159	No	344	No	154	No
	SBTR[4]	480	83	No	465	No	98	No	464	No

Notes: SR = State Route; EBL = Eastbound left; EBR = Eastbound right; WBLT = Westbound Left-Through; WBLT = Westbound Through-Right; NBLR = Shared Northbound Left-Right; SBTR = Shared Southbound Through-Right; SBR = Southbound Right.
1 Storage length is exceeded if the calculated distance is less than or equal to the storage length provided.
2 Based on 95th percentile queue length in SimTraffic 11.
3 Length measured from nearest driveway or intersection.
4 Length measured from the gore point of SR-67.

PREVIOUS COMMENTS FROM JUNE 2024 REVIEW WERE NOT ADDRESSED. COMMENTS STILL APPLY

Adjust 95th percentile after trip distributions have been updated.

Missing Table 19 that previously showed **Queuing Summary for Near Term Conditions (95th Percentile Queue). Resubmit this table and results.**

S1-46

S1-47

S1-48

8.3.5 Social, Economic and Pedestrian Safety Benefits of Proposed Improvement Measures

The applicant has prepared a detailed memorandum (Appendix L) describing project's consistency, with the City's Mobility Element goals and policies as well as outlining its social and economic benefits. The memorandum provides reasons to accept deficient LOS at this intersection which include the following:

- **Feasibility of proposed improvement:** The free-right turn proposed by the project to the City and Caltrans would have improved the LOS to D; however, Caltrans has denied this request. The only improvement measure acceptable to Caltrans is the installation of the full roundabout. The construction of a roundabout was deemed economically infeasible, as described in the memo.
- **The effectiveness of non – automotive components of the circulation system would be maintained or improved as a result:** The project proposes to improve pedestrian circulation by installing a continuous sidewalk from N. Woodside Avenue on the east, through the street's intersection with the SR-67 Southbound Off-ramp and then connect to the existing sidewalk on Woodside Avenue on the west. Currently the sidewalk is discontinuous through the intersection, leaving pedestrians to traverse approximately 130 feet of unimproved shoulder between sidewalks. **Overriding economic benefits:** The project would generate substantial economic and social benefits to the City, its residents, and its businesses. In summary, the project would generate approximately $1.8M direct income to the City over a 10 year period. In addition, economically, the project would generate $23.5M in wages paid to construction workers and then upon completion $42.9M of labor income annually. See Appendix L for detailed calculation of these benefits.

  In addition, the project proposes to rehabilitate the pavement of N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to the easternmost edge of the project driveway's intersection with N. Woodside Avenue, to the satisfaction of the City Engineer. In addition, the project will install approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk.

This section of Woodside Avenue has deteriorated over decades of use by local and through traffic, as well as from the truck traffic servicing the industrial park to the north of N. Woodside Avenue. By funding and performing the repaving work, the project will create a significant public benefit, improving street conditions for both City residents and businesses in the industrial park and relieving this financial burden from the City of Santee. Refer to Appendix J for a conceptual exhibit prepared by the applicant illustrating the proposed sidewalk and pavement rehabilitation at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection and Appendix L for a detailed discussion on project's consistency with Mobility Element policies.

Page 104 of 110 in Comment Letter S1

This improvement of widening and sidewalk installation triggers the ISOAP Policy which has superseded the ICE Policy . Previous reviews of this project also show that Caltrans has informed the applicant that this project triggered the ICE Policy which an ICE Report had already been approved for the Hybrid Roundabout in the past.

and Mitigation Measure

The proposed project would result in a traffic effect at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection, under Existing plus Project, Near Term plus Project and Buildout plus Project conditions. As explained in Section 8.3, **PDF-TRA-1 Multi-modal Intersection Improvements will be implemented, consistent with City's Mobility** Element goals and policies as well as social and economic benefits in lieu of improving delay at the intersection:

PDF-TRA-1 Multi-modal Intersection Improvements: Prior to the issuance of a building permit, the project applicant will pay its traffic impact fees to the satisfaction of the City Engineer. Prior to the Certificate of Occupancy, the project will construct a new on-site sidewalk to connect the main entrance of the building with the existing sidewalk on N. Woodside Avenue. The project applicant will also rehabilitate the pavement with a full width and adequate structural section of N. Woodside Avenue starting from, on the west, where it meets the Caltrans right of way at the intersection of the SR-67 to the eastern most edge of the project **driveway's intersection with N. Woodside Avenue, to the satisfaction of the** City Engineer. The project applicant will also install approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk near N. **Woodside Avenue's intersection with the SR**-67. **The project will install "KEEP CLEAR'" pavement** markings west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue.

The following mitigation measures would be implemented to reduce the project's VMT impact described in Section 4:

MM TRA 1 Trip Reduction Program: Prior to the issuance of first Certificate of Occupancy, the project tenant will prepare a Trip Reduction program. The program shall include the following components:

1. **Implement Commute Trip Reduction Marketing:**
   a. Set-up a Transportation Kiosk, either physically on-site or online, with transportation information that employees could access at work or on their smart phones or personal computers. If an online kiosk, information can be available on the company's website (or intranet, or internal website). The project developer or property manager will have responsibility for setting up and maintaining the information center. The Transportation Kiosk will have site-specific information about all the measures, services, and facilities discussed in this Program. In addition, the information center will include:
   b. A summary of local bus routes and local bicycle facilities to provide further information about their routes and schedules and the incentive programs available to transit users.
   c. Information about ride matching services (SANDAG - Bike Services) and on-site ride matching) and the incentive programs available to carpools.
   d. Information about services such as Uber, Lyft, and other on-demand transportation services.
   e. A local bikeways map and bicycling resources
   f. Availability of bicycle parking such as lockers and amenities including bike pumps, repair stations, full coverage lighting and security cameras.

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S1-49

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g. Information about bicycle education classes taught by certified league instructors from the San Diego County Bicycle Coalition.

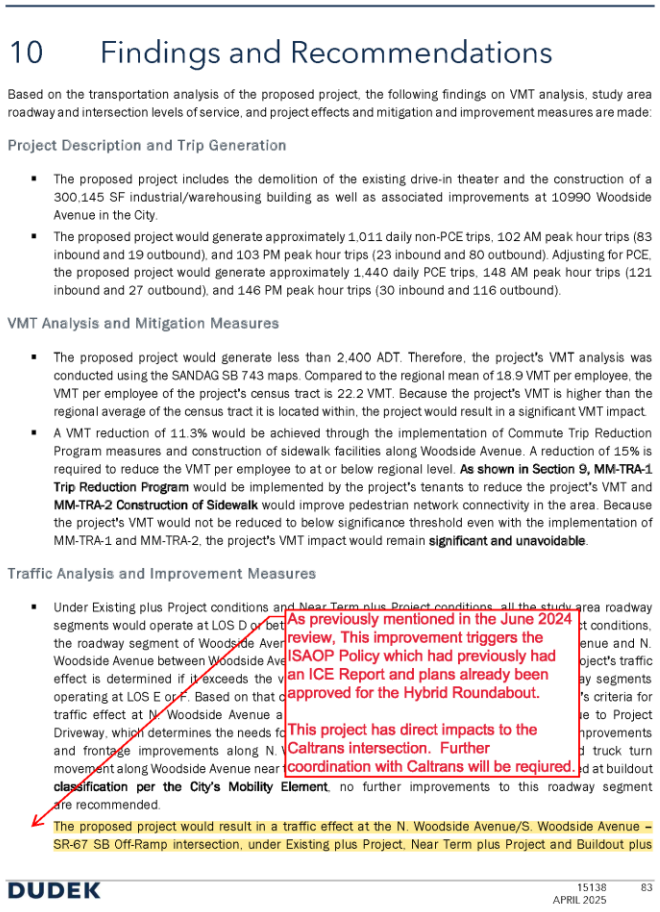
2. **Provide Ridesharing Program:** The project tenant will promote ride-sharing programs through a multi-faceted approach, such as designating a certain percentage of parking spaces for ride-sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles, and/or providing a website or message board for coordinating rides. A designated employee may partner with SANDAG to use programs such as SANDAG Vanpool, Employer Commuter Program and Guaranteed Ride Home.
3. **Implement Subsidized or Discounted Transit Program:** The project tenant would provide or reimburse the cost of monthly transit passes (such as Pronto card or mobile app) to the employees who use bus or rail transit to work to create incentive programs that reward employees for utilizing non-single occupancy vehicles to commute.
4. **Provide End of Trip Bicycle Facilities:** The project will provide at least 15 bicycle parking spaces per City's parking code requirement[7]. Where possible, appropriate designed electrical outlets will be included near the bicycle racks for charging electric bicycles (E-bikes).

MM TRA 2 Construction of Sidewalk: The Project will construct a new on-site sidewalk to connect the main entrance of the building with the existing sidewalk on N. Woodside Avenue. Together, with the sidewalk constructed per **PDF-TRA-1**, this will be a total of 990 linear feet of new sidewalk.

There is no table that shows the direct impacts being mitigated with the proposed widening and sidewalk. The TIS fails to show how the roadway widening and sidewalk installation bring the LOS back to a LOS D or better.

S1-50

[7] Per City's code 5% of motorized parking should be bicycle parking, therefore 5% of 301 car parking spaces = 15 bicycle parking spaces.



10 Findings and Recommendations

Based on the transportation analysis of the proposed project, the following findings on VMT analysis, study area roadway and intersection levels of service, and project effects and mitigation and improvement measures are made:

Project Description and Trip Generation

- The proposed project includes the demolition of the existing drive-in theater and the construction of a 300,145 SF industrial/warehousing building as well as associated improvements at 10990 Woodside Avenue in the City.
- The proposed project would generate approximately 1,011 daily non-PCE trips, 102 AM peak hour trips (83 inbound and 19 outbound), and 103 PM peak hour trips (23 inbound and 80 outbound). Adjusting for PCE, the proposed project would generate approximately 1,440 daily PCE trips, 148 AM peak hour trips (121 inbound and 27 outbound), and 146 PM peak hour trips (30 inbound and 116 outbound).

VMT Analysis and Mitigation Measures

- The proposed project would generate less than 2,400 ADT. Therefore, the project's VMT analysis was conducted using the SANDAG SB 743 maps. Compared to the regional mean of 18.9 VMT per employee, the VMT per employee of the project's census tract is 22.2 VMT. Because the project's VMT is higher than the regional average of the census tract it is located within, the project would result in a significant VMT impact.
- A VMT reduction of 11.3% would be achieved through the implementation of Commute Trip Reduction Program measures and construction of sidewalk facilities along Woodside Avenue. A reduction of 15% is required to reduce the VMT per employee to at or below regional level. **As shown in Section 9, MM-TRA-1 Trip Reduction Program** would be implemented by the project's tenants to reduce the project's VMT and **MM-TRA-2 Construction of Sidewalk** would improve pedestrian network connectivity in the area. Because the project's VMT would not be reduced to below significance threshold even with the implementation of MM-TRA-1 and MM-TRA-2, the project's VMT impact would remain **significant and unavoidable**.

Traffic Analysis and Improvement Measures

- Under Existing plus Project conditions and Near Term plus Project conditions, all the study area roadway segments would operate at LOS D or bet ct conditions, the roadway segment of Woodside Aven enue and N. Woodside Avenue between Woodside Ave oject's traffic effect is determined if it exceeds the v ay segments operating at LOS E or F. Based on that c 's criteria for traffic effect at N. Woodside Avenue a e to Project Driveway, which determines the needs fo provements and frontage improvements along N. V d truck turn movement along Woodside Avenue near d at buildout **classification per the City's Mobility Element**, no further improvements to this roadway segment are recommended.
- The proposed project would result in a traffic effect at the N. Woodside Avenue/S. Woodside Avenue – SR-67 SB Off-Ramp intersection, under Existing plus Project, Near Term plus Project and Buildout plus

As previously mentioned in the June 2024 review, This improvement triggers the ISAOP Policy which had previously had an ICE Report and plans already been approved for the Hybrid Roundabout.

This project has direct impacts to the Caltrans intersection. Further coordination with Caltrans will be required.

S1-51

Project conditions, **PDF-TRA-1 Multi-modal Intersection Improvements (see Section 9)** will be implemented, consistent with **City's Mobility Element** goals and policies as well as social and economic benefits in lieu of improving delay at the intersection:

S1-51 Cont.

- The project would construct a dedicated eastbound left turn lane at the Project Access Driveway/ N. Woodside Avenue. The project access driveway will be designed per City specifications for commercial driveways. The project would be responsible for constructing frontage improvements including sidewalks along the northern side of Woodside Avenue and connect to the existing sidewalk along N. Woodside Avenue. The project would also install crosswalks to improve pedestrian circulation at the Project Access Driveway/N. Woodside Avenue.

11 References

AASHTO (American Association of State Highway and Transportation Officials). A policy on Geometric Design of Highways and Streets. 2018. 7th Edition

CAPCOA (California Air Pollution Control Officers Association). 2021. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity.

City of Santee. 2017. Proposed Update to Existing Circulation Element (Mobility Element) Technical Report and Traffic Study. July 2017.

City of Santee. 2017. General Plan Mobility Element, Adopted October 25, 2017.

City of Santee. 2022. City of Santee VMT Analysis Guidelines. April 13, 2022

Transportation Impact Analysis Fanita Ranch, Santee, March 25, 2020

ITE (Institute of Transportation Engineers). 2021. Trip Generation Manual. 11th ed.

OPR (California Governor's Office of Planning and Research). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. December 2018. Accessed February 2021. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

SANDAG (San Diego Association of Governments). 2002. Brief Guide of Vehicular Trip Generation Rates for the San Diego Region. April 2002.

TRB (Transportation Research Board). 2016. Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis.

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Comment Letter O1

From: Tom Hissong <tomhissong723@gmail.com>
Sent: Thursday, May 29, 2025 8:09 PM
To: Sandi Sawa
Subject: Drive In Theatre Property

O1-1

I am very concerned about the proposed building going where the Santee drive-in property is currently. I do not think that we have the road accommodations and entrances to freeways to accommodate the quantity of 45' semis proposed going in and out of this property. I also see that it will be a 7/24 facility There will be noise pollution, exhaust pollution, and traffic congestion. Not to mention the blocked views from a 50 foot tall building, that is 300,000 ft.^{2}.

O1-1

Tom Hissong, Vice President
San Diego Parrot Head Club
9233 Bird Street
Santee Ca 92071

Response to Comment Letter O1

San Diego Parrot Head Club
Tom Hissong, Vice President
May 29, 2025

The comment expresses concern about the proposed Project, particularly regarding the number of trucks that would be on roads and freeway entrances. Further, the comment expresses concerns regarding noise, air quality, traffic congestion, and potential blocked views from the 50-foot building.

For more information regarding traffic concerns, please see Thematic Response 1: Transportation. For more information regarding noise, please see Thematic Response 2: Noise. Pollutant emissions and air quality impacts were evaluated in Section 4.2, Air Quality, of the Draft EIR. The analysis in that section demonstrated that the Project would result in less-than-significant air quality impacts and no mitigation was needed. Impacts related to views and visual character of the area were evaluated in Section 4.1, Aesthetics, of the Draft EIR. The analysis in Section 4.1 determined that there would be no significant impacts and no mitigation was required. Overall, the comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed project. Therefore, no further response is required.

Comment Letter O2



June 3, 2025

EMAILED AND HAND-DELIVERED ON JUNE 4, 2025

RECEIVED

JUN 04 2025

Dept. of Development Services
City of Santee

City of Santee
Attn: Sandi Sawa, ACICP Director of Planning & Building
10601 Magnolia Avenue
Santee, CA 92071

Attn: Palisade Santee Commerce Center Draft Environmental Impact Report (EIR) (SCH # 2023090144)

Dear Ms. Sawa,

This letter is submitted in response to the draft EIR for the above-referenced project. As City of Santee residents living in the residential neighborhood directly north of the proposed development site - across the San Diego River - we wish to express our concerns regarding the potential impacts both the construction phase and the operational phase may have on our quality of life and to the surrounding community.

Many of us have lived in this quiet residential neighborhood for over three decades, with several of the original homeowners still present. While we all moved here at different times, we all have one thing in common – we love our small neighborhood. We have also coexisted with the current uses within the Light Industrial (LI) zoned area. While this coexistence has generally been manageable, it has not been without disruption - businesses often begin operations before 7:00 a.m., some have Saturday operations, and it is not uncommon to the beeping of trucks and the grinding of metal throughout the daytime, and drag, street racing or some other form of vehicular activity well past 1:00 a.m.

With the scale and scope of the proposed project, we are concerned that these disturbances will intensify and multiply in occurrence. We respectfully urge the City of Santee decision-makers to carefully consider the cumulative and ongoing effects that this development may have on the adjacent residential, biological, and recreational areas.

Our comments on the Draft EIR are submitted in the spirit of ensuring that the final project is consistent with the residential and recreational (park) uses it buffers. At a broad level it appears there is a disconnect between the proposed project as it is described in the Draft EIR and the assumptions or findings that are presented in several of the various supporting technical studies. These disconnects are exacerbated by the lack of specificity with the project description, particularly regarding its use. It's not clear if the roughly 300,000 square foot of warehousing will serve as a logistics center or cross-dock facility (similar to Amazon) which would generate much more traffic and loading dock operational noise than a more traditional manufacturing warehouse. *"The proposed Palisade Santee Commerce Center Project includes the demolition and/or removal of all existing on-site structures and the construction of a 300,145 square foot industrial/warehousing building on a 13.5-acre site. The Project would include 290,145 square feet of warehouse space and 10,000 square feet of office space."* Given the size and nature of the proposed use, more clarity and transparency are necessary in order to fully assess and understand the potential impacts on our and other surrounding neighborhoods.

Page 1 of 5

O2-1

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O2-3

Response to Comment Letter O2

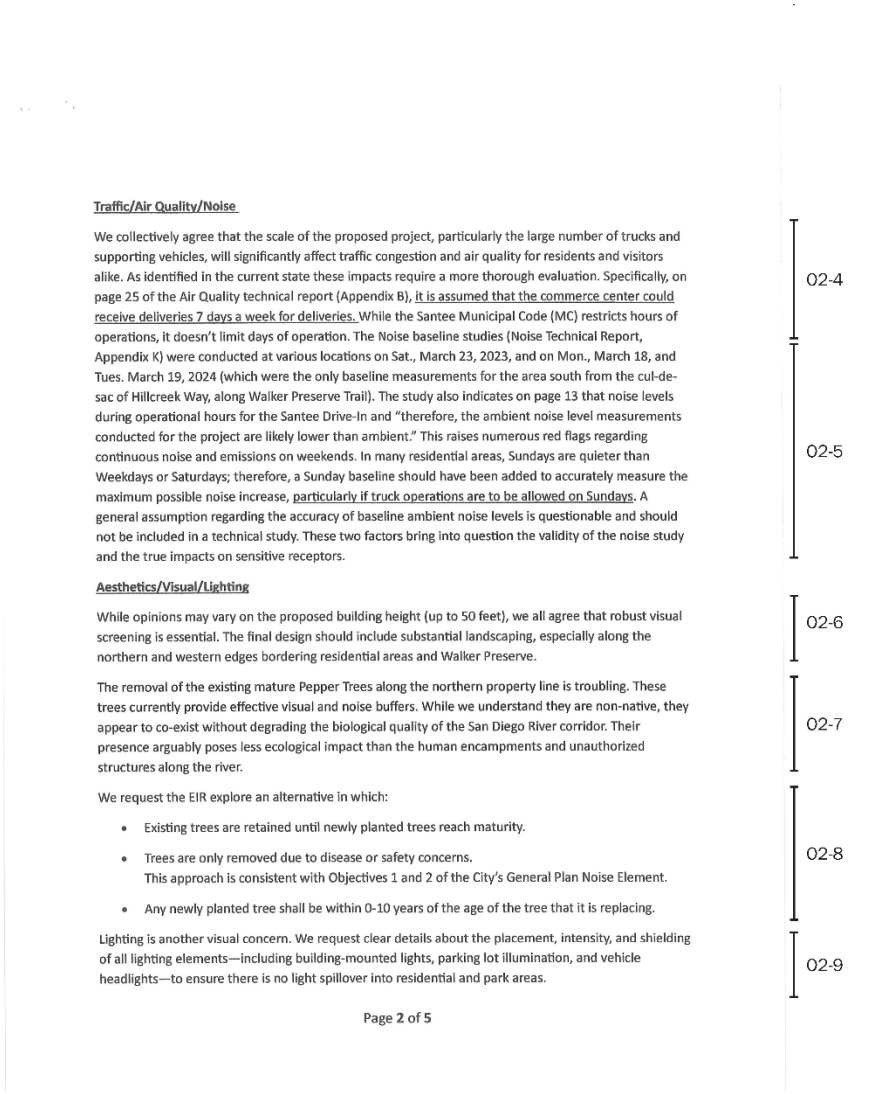
Hillcreek Neighbors
June 4, 2025

O2-1 The comment introduces the commenters as a group of residents in the neighborhood directly north and across the San Diego River from the Project site. The comment states that the residents have concerns regarding potential impacts of the Project during construction and operation. The comment also provides information regarding existing noises from the existing light industrial uses in the Project area. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed project. Therefore, no further response is required.

O2-2 The comment expresses concern that disturbances in the area will intensify and multiply with the proposed Project, and urges the City to consider cumulative and ongoing effects that development may have on the adjacent residential, biological, and recreational areas.

The Project's noise impacts were evaluated in Section 4.10, Noise, of the Draft EIR. The analysis in that section concluded that all noise impacts would be less than significant and no mitigation is required. Impacts of the Project on biological resources were analyzed in Section 4.3, Biological Resources, of the Draft EIR. While the Project would have some potentially significant impacts on biological resources, implementation of mitigation measures MM-BIO-1, MM-BIO-2, MM-BIO-3, and MM-BIO-4 would reduce all impacts to less-than-significant levels.

This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or



Traffic/Air Quality/Noise

We collectively agree that the scale of the proposed project, particularly the large number of trucks and supporting vehicles, will significantly affect traffic congestion and air quality for residents and visitors alike. As identified in the current state these impacts require a more thorough evaluation. Specifically, on page 25 of the Air Quality technical report (Appendix B), it is assumed that the commerce center could receive deliveries 7 days a week for deliveries. While the Santee Municipal Code (MC) restricts hours of operations, it doesn't limit days of operation. The Noise baseline studies (Noise Technical Report, Appendix K) were conducted at various locations on Sat., March 23, 2023, and on Mon., March 18, and Tues. March 19, 2024 (which were the only baseline measurements for the area south from the cul-de-sac of Hillcreek Way, along Walker Preserve Trail). The study also indicates on page 13 that noise levels during operational hours for the Santee Drive-In and "therefore, the ambient noise level measurements conducted for the project are likely lower than ambient." This raises numerous red flags regarding continuous noise and emissions on weekends. In many residential areas, Sundays are quieter than Weekdays or Saturdays; therefore, a Sunday baseline should have been added to accurately measure the maximum possible noise increase, particularly if truck operations are to be allowed on Sundays. A general assumption regarding the accuracy of baseline ambient noise levels is questionable and should not be included in a technical study. These two factors bring into question the validity of the noise study and the true impacts on sensitive receptors.

Aesthetics/Visual/Lighting

While opinions may vary on the proposed building height (up to 50 feet), we all agree that robust visual screening is essential. The final design should include substantial landscaping, especially along the northern and western edges bordering residential areas and Walker Preserve.

The removal of the existing mature Pepper Trees along the northern property line is troubling. These trees currently provide effective visual and noise buffers. While we understand they are non-native, they appear to co-exist without degrading the biological quality of the San Diego River corridor. Their presence arguably poses less ecological impact than the human encampments and unauthorized structures along the river.

We request the EIR explore an alternative in which:

- Existing trees are retained until newly planted trees reach maturity.
- Trees are only removed due to disease or safety concerns.
  This approach is consistent with Objectives 1 and 2 of the City's General Plan Noise Element.
- Any newly planted tree shall be within 0-10 years of the age of the tree that it is replacing.

Lighting is another visual concern. We request clear details about the placement, intensity, and shielding of all lighting elements—including building-mounted lights, parking lot illumination, and vehicle headlights—to ensure there is no light spillover into residential and park areas.

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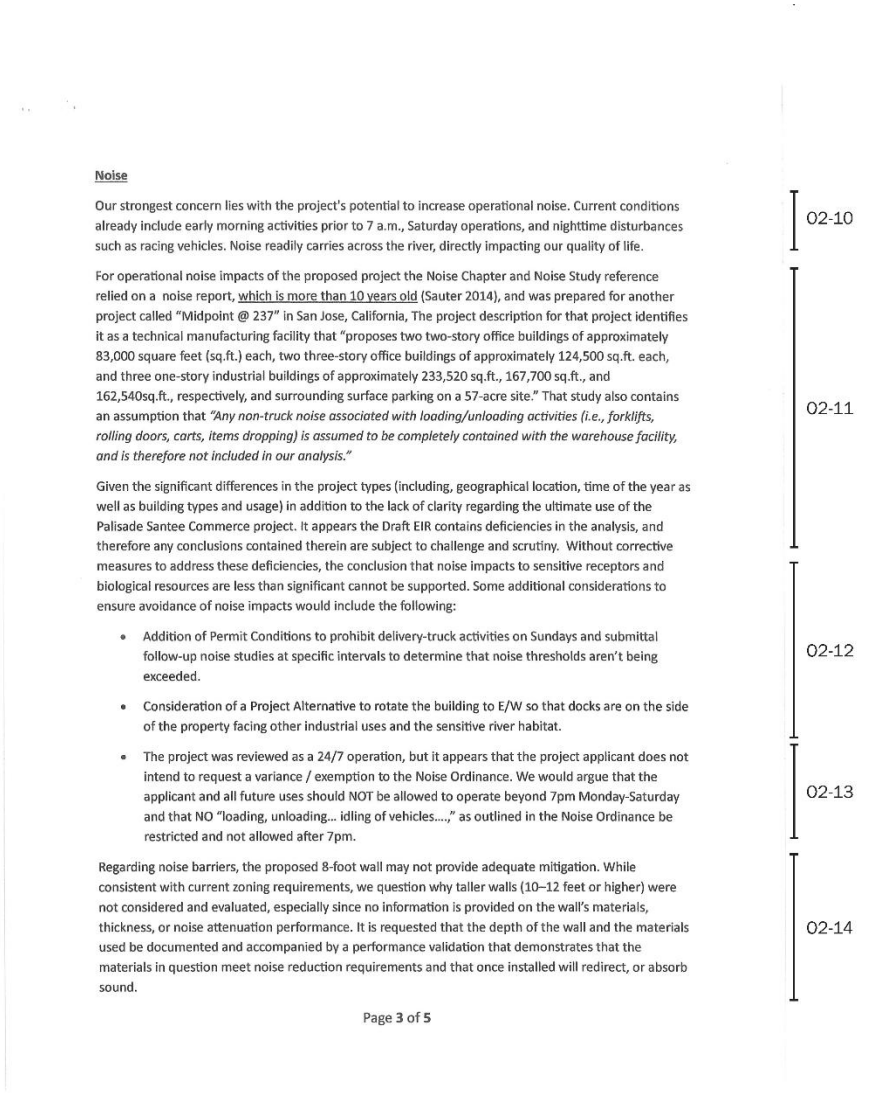
Page 2 of 5 in Comment Letter 02

accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-3 The comment alleges that there is a disconnect between the proposed Project as described in the Draft EIR and the assumptions and findings in the technical reports. Further, the comment states that it is not clear whether the facility would be a warehousing facility or similar that would generate more traffic and operational noise than a traditional warehouse. Finally, the comment also states that more clarity and transparency are necessary to understand potential impacts on neighborhoods.

The proposed Project is described in Chapter 3, Project Description, of the Draft EIR. Each of the supporting technical studies includes a description of the Project, though the specific language may be slightly different. The comment does not provide specific instances where the commenters may perceive a disconnect between the Project description among the Draft EIR and the supporting studies.

Regarding the use that would occupy the Project site, it would be required to be a use that is allowed within the Project site's existing Light Industrial zoning designation. Should a use be contemplated at the Project site that is conditionally allowed in the LI zoning, an application to the City would be required and additional CEQA documentation may be required. Any uses not permitted in the LI zoning would not be permitted at the Project site. At this time, it is unknown what businesses would occupy the Project buildings. It is not unusual for buildings to be built without specific users being known. The assumptions and analysis in the Draft EIR, including its supporting technical reports, are based on the allowed uses within the LI zoning. Therefore, the Draft EIR has not evaluated a specific business or particular use. The technical assumptions are based on the LI



Noise

Our strongest concern lies with the project's potential to increase operational noise. Current conditions already include early morning activities prior to 7 a.m., Saturday operations, and nighttime disturbances such as racing vehicles. Noise readily carries across the river, directly impacting our quality of life.

For operational noise impacts of the proposed project the Noise Chapter and Noise Study reference relied on a noise report, which is more than 10 years old (Sauter 2014), and was prepared for another project called "Midpoint @ 237" in San Jose, California, The project description for that project identifies it as a technical manufacturing facility that "proposes two two-story office buildings of approximately 83,000 square feet (sq.ft.) each, two three-story office buildings of approximately 124,500 sq.ft. each, and three one-story industrial buildings of approximately 233,520 sq.ft., 167,700 sq.ft., and 162,540sq.ft., respectively, and surrounding surface parking on a 57-acre site." That study also contains an assumption that *"Any non-truck noise associated with loading/unloading activities (i.e., forklifts, rolling doors, carts, items dropping) is assumed to be completely contained with the warehouse facility, and is therefore not included in our analysis."*

Given the significant differences in the project types (including, geographical location, time of the year as well as building types and usage) in addition to the lack of clarity regarding the ultimate use of the Palisade Santee Commerce project. It appears the Draft EIR contains deficiencies in the analysis, and therefore any conclusions contained therein are subject to challenge and scrutiny. Without corrective measures to address these deficiencies, the conclusion that noise impacts to sensitive receptors and biological resources are less than significant cannot be supported. Some additional considerations to ensure avoidance of noise impacts would include the following:

- Addition of Permit Conditions to prohibit delivery-truck activities on Sundays and submittal follow-up noise studies at specific intervals to determine that noise thresholds aren't being exceeded.
- Consideration of a Project Alternative to rotate the building to E/W so that docks are on the side of the property facing other industrial uses and the sensitive river habitat.
- The project was reviewed as a 24/7 operation, but it appears that the project applicant does not intend to request a variance / exemption to the Noise Ordinance. We would argue that the applicant and all future uses should NOT be allowed to operate beyond 7pm Monday-Saturday and that NO "loading, unloading... idling of vehicles...," as outlined in the Noise Ordinance be restricted and not allowed after 7pm.

Regarding noise barriers, the proposed 8-foot wall may not provide adequate mitigation. While consistent with current zoning requirements, we question why taller walls (10–12 feet or higher) were not considered and evaluated, especially since no information is provided on the wall's materials, thickness, or noise attenuation performance. It is requested that the depth of the wall and the materials used be documented and accompanied by a performance validation that demonstrates that the materials in question meet noise reduction requirements and that once installed will redirect, or absorb sound.

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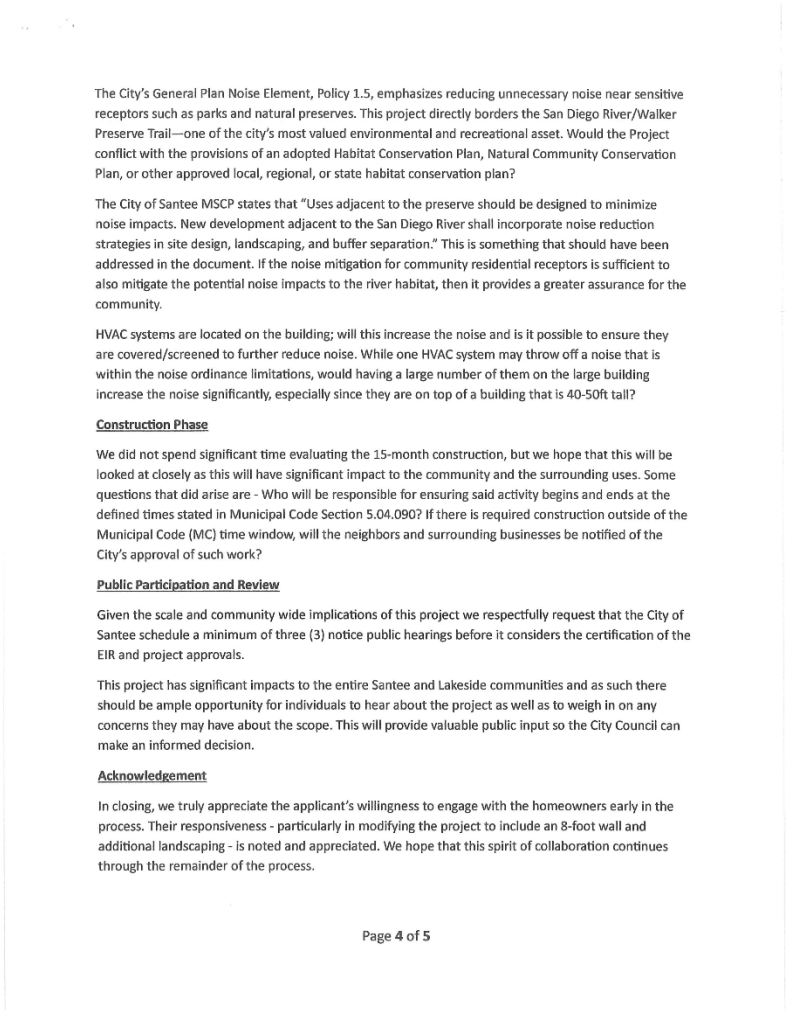
use, which means that as long as a future use is within the allowed uses within the LI zoning, all potential impacts have been disclosed. In the TIS (Appendix L of the draft EIR), however, Industrial Park use was evaluated, which is a more intensive use than a standard warehouse use. By using the Industrial Park use, the TIS accounted for more LI zoning uses than just standard warehouse use.

Regarding clarity and transparency, the comment does not identify specific information that is needed. As stated above, the specific users of the Project site are not yet known and the Draft EIR presents all information available and has evaluated the proposed Project consistent with the LI zoning.

Overall, this comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-4 The comment states that the Project would affect traffic congestion and air quality and that these topics require a more thorough evaluation. Further the comment states that it is assumed that the Project could receive deliveries seven days per week.

Please see Thematic Response 1: Transportation for information regarding traffic. Air quality impacts were evaluated in Section 4.2, Air Quality, of the Draft EIR. The analysis in that section demonstrated that the Project would result in less-than-significant air quality impacts and no mitigation was needed. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed project. Therefore, no further response is required.



The City's General Plan Noise Element, Policy 1.5, emphasizes reducing unnecessary noise near sensitive receptors such as parks and natural preserves. This project directly borders the San Diego River/Walker Preserve Trail—one of the city's most valued environmental and recreational asset. 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?

The City of Santee MSCP states that "Uses adjacent to the preserve should be designed to minimize noise impacts. New development adjacent to the San Diego River shall incorporate noise reduction strategies in site design, landscaping, and buffer separation." This is something that should have been addressed in the document. If the noise mitigation for community residential receptors is sufficient to also mitigate the potential noise impacts to the river habitat, then it provides a greater assurance for the community.

HVAC systems are located on the building; will this increase the noise and is it possible to ensure they are covered/screened to further reduce noise. While one HVAC system may throw off a noise that is within the noise ordinance limitations, would having a large number of them on the large building increase the noise significantly, especially since they are on top of a building that is 40-50ft tall?

Construction Phase

We did not spend significant time evaluating the 15-month construction, but we hope that this will be looked at closely as this will have significant impact to the community and the surrounding uses. Some questions that did arise are - Who will be responsible for ensuring said activity begins and ends at the defined times stated in Municipal Code Section 5.04.090? If there is required construction outside of the Municipal Code (MC) time window, will the neighbors and surrounding businesses be notified of the City's approval of such work?

Public Participation and Review

Given the scale and community wide implications of this project we respectfully request that the City of Santee schedule a minimum of three (3) notice public hearings before it considers the certification of the EIR and project approvals.

This project has significant impacts to the entire Santee and Lakeside communities and as such there should be ample opportunity for individuals to hear about the project as well as to weigh in on any concerns they may have about the scope. This will provide valuable public input so the City Council can make an informed decision.

Acknowledgement

In closing, we truly appreciate the applicant's willingness to engage with the homeowners early in the process. Their responsiveness - particularly in modifying the project to include an 8-foot wall and additional landscaping - is noted and appreciated. We hope that this spirit of collaboration continues through the remainder of the process.

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Page 4 of 5 in Comment Letter 02

02-5 The comment reviews details of the noise report, which is included as Appendix K to the Draft EIR. The comment states that a Sunday baseline should have been added to measure the maximum possible noise increase, particularly if truck operations are to be allowed on Sundays. Please see Thematic Response 2: Noise for information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-6 The comment states that the final design should include landscaping, especially along the northern and western edges. Landscaping and lighting improvements that are included as part of the Project are described beginning on page 3-7 of the Draft EIR, with landscaping depicted in Figure 3-9 of the Draft EIR. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-7 The comment expresses concern with the removal of existing pepper trees along the northern property line as the trees provide visual and noise buffers. Impacts related to views and visual character of the area were evaluated in Section 4.1, Aesthetics, of the Draft EIR. The analysis in Section 4.1 determined that there would not be significant impacts and no mitigation was required. As discussed on page 3-27 and shown in Figure 3-11 of the Draft EIR, an eight-foot-tall noise barrier located partially along the northern site boundary will be constructed as part of the Project. The Project's noise impacts were evaluated in Section 4.10, Noise, of the Draft EIR. The analysis in that section concluded that all noise impacts would



Thank you for the opportunity to express our comments and concerns.

Sincerely,

HILLCREEK NEIGHBORS:
Scott Benson
KC and Nicole Cacho
Robert and Tania Comella
Larry and Bonnie Ellis
Kevin and Tonnia Frakes
Robin Fries
Doug Hansen
Jack and Lisa Landers
Bill and Stacey LoMedico
Robert and Meghan Maher
Troy and Kirsten McCarty
Bill and Nancy McDaniel
Mandy Navarro
Charles and Seanne Sanchez
Rick and June Skinner

Page 5 of 5

be less than significant and no mitigation is required. Refer also to Thematic Response 2: Noise for additional information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-8 The comment requests an EIR alternative that would include provisions for temporary retention of on-site trees and other requirements related to trees. In the impact analysis beginning on page 4.3-20 of the Draft EIR, it is noted that implementation of the Project would require removal of existing trees. Mitigation measure MM-BIO-4 provides direction for tree replacement, encroachment, and preservation. With implementation of MM-BIO-4, impacts to protected tree species would be reduced to a less-than-significant level. Additionally, measures to minimize damage to the encroachment and preserved trees, as well as recommendations for long-term maintenance and care for trees that will be retained on site, would be included in the Project's Landscape Plan.

As discussed on page 7-1 of the Draft EIR, consistent with CEQA Guidelines Section 15126.6, the Alternatives chapter focuses on alternatives to the Project that are capable of avoiding or substantially reducing any significant adverse impacts associated with the Project. Because impacts to trees would not be significant with implementation of MM-BIO-4, there is no need to develop an alternative that would address trees in accordance with the commenter's suggestions. Further, CEQA Guidelines Section 15126.6(a) requires a reasonable range of alternatives, but does not require consideration of specific alternatives. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided

in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-9 The comment expresses concern about Project lighting and requests clear details regarding all elements of Project lighting to ensure that there would be no light spillover into residential and park areas. Information regarding the Project's lighting is presented beginning on page 3-17 of the Draft EIR. The analysis of lighting impacts is discussed beginning on page 4.1-21 of the Draft EIR. According to the Site Photometric Plan prepared for the Project (Herdman Architecture + Design 2024), wall mounted light fixtures (53 in total) would be installed on the exterior façades of the building. Approximately half of the wall fixtures would be mounted at a height of 25 feet above ground surface and the remaining half would be mounted at a height of 9 feet above ground surface. In addition, approximately 18 pole mounted lights would be installed throughout the site parking lot and the site driveway. The mounting height of pole lights would be 25 feet above ground surface. All lighting fixtures would be hooded and downward casting. Fixture housing would feature a cast black painted metal finish. Lamp/light sources would be white, LEDs.

Project lighting has been designed consistent with the requirements of Section 13.30.030(B) of the Santee Municipal Code. Specifically, exterior lighting on the Project site would result in the adequate lighting of parking areas and would cast light downward where most lighting would fall onto the site (offsite light trespass would be minimal). As shown on the Site Photometric Study, all measurable lighting (i.e., 0.1-foot candles or greater) would generally be contained within the site boundary. Along the site's northern boundary with the San Diego River floodway, most measurable lighting would be contained

onsite with limited occurrences of lighting (0.1-0.4 footcandles) extending north of the site's northwestern corner (light levels in this area would be reduced to 0.0-foot candles approximately 20 feet north of the project boundary). Light levels extending north of the Project site would be 0.0 footcandles or low (generally, 0.1-0.3 footcandles) and would quickly reduce in intensity with increased distance from the source and Project site. On page 4.1-22 of the Draft EIR, the analysis concluded that the Project would have a less-than-significant impact related to lighting. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-10 The comment expresses concern with operational noise and notes that existing noise readily carries across the river, directly impacting the quality of life of residents in the area. Please see Thematic Response 2: Noise for information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-11 The comment questions the reference to a noise report (Sauter [sic] 2014) in the noise study (Appendix K of the Draft EIR) and the noise section of the Draft EIR (Section 4.10). Further, the comment questions the difference in project types between the one in the Salter 2014 reference and the proposed Project. The noise memorandum uses the Salter study as a basis for prediction of truck noise operations at loading docks. It provides sound data for a sample facility using similar operations to what are expected in the planned facility, and the data are as current today as they were 10 years ago for these kinds of sound sources

and operations. This is not the basis for the entire memorandum; it is simply a methodology used to analyze the addition of truck operations in conjunction with other operational noise sources. The comment does not appear to offer an alternative methodology or corrective measures that would be acceptable for the prediction of future operational noise related to truck operations. Predictions must be made prior to construction to ensure compatibility with City thresholds, and given the nature of the permit application, this is the best methodology that can be done to determine the potential for that compatibility. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

O2-12 The comment claims that the conclusion that noise impacts would be less than significant cannot be supported and that additional consideration should be given to permit conditions restricting truck activities and an alternative featuring rotation of the Project building. Please see Thematic Response 2: Noise for information responsive to this comment. Also, please see Response to Comment O2-11 regarding the methodology of the noise technical analysis. Regarding an alternative featuring rotation of the Project building, the noise analysis determined that noise impacts from the proposed Project would be less than significant. Because CEQA alternatives are intending that would reduce significant impacts, including a building rotation as suggested by the comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-13 The comment states that the Project, which is reviewed as a 24/7 operation, does not intend to request a variance/exception to the City's noise ordinance. The comment also urges all future uses not be allowed to operate beyond day and time limits imposed by the noise ordinance Please see Thematic Response 2: Noise for information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-14 The comment alleges that the proposed 8-foot noise barrier may not provide adequate mitigation and questions why taller walls were not considered. Further, the comment requests additional information regarding wall depth and material. Please see Thematic Response 2: Noise for information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-15 The comment states the intent of Policy 1.5 of the Noise Element and questions whether or not this project would conflict with provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP) or other approved local, regional or state habitat conservation plan. The comment also states that noise reduction strategies in site design, landscaping and buffer separation should have been addressed in the Draft EIR.

The analysis of potential conflicts with an adopted HCP, NCCP or other conservation plans is specifically addressed under Threshold F of Section 4.3, Biological Resources, of the Draft EIR. While an HCP has not yet been adopted for the City of Santee,

this analysis acknowledges that "the Project site is adjacent to the Preserve areas associated with the San Diego River corridor as identified in the Draft Santee Multiple Species Conservation Plan (MSCP) Subarea Plan." The analysis concludes that MM BIO-2 and MM BIO-3 are proposed to prevent any indirect impacts on resources within the San Diego River Preserve, and the proposed project would not prevent the Draft Santee MSCP Subarea Plan from being approved or compromise continued implementation of the MSCP in the San Diego County. Thus, impacts related to HCPs would be less than significant.

With respect to noise, refer to Thematic Response 2; Noise.

This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-16 The comment questions whether the HVAC systems located on the Project building's roof would increase noise significantly, especially given building height. As discussed on page 4.10-21 of the Draft EIR, the noise analysis completed for the Project included assumptions regarding HVAC equipment from a combination of inputs that include square footage values for the proposed Project's proposed office spaces, Project applicant response to data requests, and manufacturer sound power level data. For the analysis of noise from HVAC equipment operation, eight air conditioning units were modeled on the roofs of the Project building. Thus, the noise analysis assumed multiple rooftop HVAC units during Project operation. As stated in Section 4.10, Noise, of the Draft EIR, impacts related to noise would be less than significant and no mitigation is required. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy

of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-17 The comment questions who will be responsible for ensuring Project construction activity only occurs during the times allowed by the municipal code. Further, the comment asks whether neighbors and surrounding businesses would be notified if the City approves construction work to occur outside of the window provided by the City's Municipal Code. Page 4.10-12 of the Draft EIR states the following:

> *Construction activities are subject to Section 5.04.090 of the City's Noise Ordinance, which specifically prohibits the operation of any single or combination of powered construction equipment at any construction site on Mondays through Thursday except between the hours of 7:00 a.m. and 7:00 p.m. Further, construction equipment with a manufacturer's noise rating of 85 dBA Lmax or greater may only operate at a specific location for 10 consecutive workdays. A notice must be provided to all property owners within 300 feet if work is scheduled for more than 10 days and must be provided no later than 10 days prior to the start of the construction.*

Concerns about construction noise occurring outside of the window established by the code are to be filed with the City's Code Compliance Division.

This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information

provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-18 The comment requests a minimum of three noticed public hearings prior to consideration of EIR certification and Project approvals so that there is ample opportunity for public input. For this and all projects with applications seeking approval from the City, all public notices are done in compliance with CEQA requirements and the City's Municipal Code. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

02-19 The comment commends the Project applicant's willingness to engage with the homeowners and looks forward to continued collaboration. Comment noted. The comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed project. Therefore, no further response is required.

Comment Letter O3

San Diego County Archaeological Society, Inc.

Environmental Review Committee

June 2, 2025

To: Ms. Sandi Sawa, AICP, Director
Department of Planning and Building (Building 4)
City of Santee
10601 Magnolia Avenue
Santee, California 92071

Subject: Draft Environmental Impact Report
Palisade Santee Commerce Center Project

Dear Ms. Sawa:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its appendices E and F, we agree with the impact analyses and mitigation measures proposed. While Appendix E did not inspect the 1928-1929 "Tax Factor" aerial photos, the analysis suggests that the conclusions would not be materially affected.

O3-1

SDCAS appreciates participating in this project's environmental review.

Sincerely,

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Dudek
SDCAS President
File

RECEIVED
JUN 4 2025
Dept. of Development Services
City of Santee

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

Response to Comment Letter O3

San Diego County Archaeological Society
James W. Royle, Jr., Chairperson
June 2, 2025

O3-1 The comment expresses the San Diego County Archaeological Society's agreement with the impact analyses and mitigation measures of the Draft EIR, Appendix E (Archaeological Inventory), and Appendix F (Historical Assessment). The comment is noted. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed project. Therefore, no further response is required.

SAN DIEGO CA 920
2 JUN 2025 PM 2 L

San Diego County
Archaeological Society
P.O. Box 81106
San Diego, CA 92138-1106

Ms. Sandi Sawa, AICP, Director
Planning and Building Department
City of Santee
10601 Magnolia Avenue, Building 4
Santee, CA 92071

92071-122201

Page 2 of 2 in Comment Letter 03

Comment Letter I1

From: Phil/Linda Decker <philandlindadecker@gmail.com>
Sent: Thursday, May 22, 2025 5:22:35 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Palisade Santee Commerce Center EIR

May 22nd, 2025

To: Sandi Sawa, AICP, Director of Planning & Building,

From: Philip & Linda Decker
9244 Bird St.
Santee, CA 92071

We have been citizens of Santee since 1971. We live directly across the freeway from the Santee Drive-in theater and the proposed Palisade Project.
We are very much against this project for the reason of how much traffic it will add to the already busy Woodside Ave. before it even gets to Magnolia Ave. and the 67 and 52 Freeways. It's bad enough that they are putting in 301 passenger-vehicle parking spaces to add to our traffic. What is really scary is that they plan for 42 dock-high doors. That is way too many big trucks and trailers clogging our streets. It's bad enough that we have to put up with that Truck Driving School that is located in that area. All these extra vehicles will add extra wear and tear to our local streets. This is the wrong location for this large project. We really hope that you will not allow this Palisade Project to happen. I1-1

Sincerely,

Philip & Linda Decker

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Response to Comment Letter I1

Philip and Linda Decker
May 22, 2025

I1-1 The comment expresses opposition to the Project, citing added traffic and big trucks and trailers clogging the streets. Please see Thematic Response 1: Transportation for a discussion regarding transportation impacts. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed project. Therefore, no further response is required.

Comment Letter I2

From: John Ryan <johnnyryan2013@yahoo.com>
Sent: Thursday, May 29, 2025 11:58 PM
To: Sandi Sawa
Subject: Drive in movie grounds

I2-1

Don't put a building that big there please I don't want the smog or traffic or the block of my view Keep Santee not like a down town please I2-1

Sent from my iPhone

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Response to Comment Letter I2

John Ryan
May 29, 2025

The comment expresses opposition to the Project, citing large building size, smog, traffic, and blocking of views. Please see Thematic Response 1: Transportation for a discussion regarding transportation impacts. Impacts related to views and visual character of the area were evaluated in Section 4.1, Aesthetics, of the Draft EIR. The analysis in Section 4.1 determined that there would be no significant impacts and no mitigation was required. Pollutant emissions and air quality impacts were evaluated in Section 4.2, Air Quality, of the Draft EIR. The analysis in that section demonstrated that the Project would result in less-than-significant air quality impacts and no mitigation was needed. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Comment Letter I3

[redacted]

From: Vicki krismer <krismers@gmail.com>
Sent: Friday, May 23, 2025 11:23:27 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Sandi Sawa RE: Santee Palisade Project

Regarding the Santee Palisade Project Proposal in Santee, this project will have negative impacts on the Santee Community. These disruptions include negative impact to the environment, physical and mental health issues and daily life. I3-1

The South 67 off ramp and the North 67 on ramp on Riverford have become very congested areas. Riverford is on the border of Santee and Lakeside and this area has not been improved to accommodate your Santee Palisade Project. Santee and Lakeside cannot come to an agreement on which party is responsible for improving this congested area. I3-2

By approving this plan, this allows the heavy equipment to go out both ends of North Woodside, on the Mission Gorge end and Riverford. This takes away our freeway access and safety. The intersection of North Woodside and Riverford does not have sufficient space for the amount of traffic this plan will create. I3-3

Santee changed the noise level restrictions and allowed the building to be raised from 40 to 50 feet. Santee's actions have been reckless and did not take the quality of life into consideration for the residents of Santee. I3-4

Sincerely,

Vicki Krismer
9231 Northcote Road
Santee, CA 92071

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Response to Comment Letter I3

Vicki Krismer
May 23, 2025

I3-1 The comment states that the Project will have negative impacts on the Santee community, including negative impacts on the environment, physical and mental health issues, and daily life. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I3-2 The comment remarks that the SR-67 southbound offramp and the SR-67 northbound on-ramp at Riverford Road are very congested. Please see Thematic Response 1: Transportation for a discussion regarding transportation impacts. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I3-3 The comment states that the Project would take away freeway access and safety, and the intersection of North Woodside Avenue and Riverford Road does not have sufficient space for the amount of traffic the Project would generate. Please see Thematic Response 1: Transportation for a discussion regarding transportation impacts. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I3-4 The comment states that the City changed its noise restrictions. The comment also states that allowing the building to be 50-feet tall instead of requiring compliance with the 40-foot maximum is reckless and does not consider the quality of life for Santee residents. The City has not changed its noise restrictions. Also, the Project applicant has not requested that noise restrictions for the Project site be altered in any way. Section 4.1, Aesthetics, of the Draft EIR evaluated the potential impacts of the Project related to scenic views, scenic resources, existing visual character, and lighting and glare. The analyses in this section considered the 50-foot height of the proposed building. This section concluded that the proposed Project would not result in any significant impacts related to aesthetics. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Comment Letter I4

From: Tri Dang <tridangcontact@gmail.com>
Sent: Thursday, May 29, 2025 9:33 PM
To: Sandi Sawa
Subject: RE: Palisade Project

Hi Sandi,

I'm writing to you in regards to the planned Palisade Project https://www.cityofsanteeca.gov/documents/planning-building/active-projects/palisade/palisade-draft-eir.pdf?fbclid=IwQ0xDSwKmEw5leHRuA2FlbQIxMQABHiqjI_UWyO_pYdRWh0AJKaz9GTScWpNhvaXTPZ88GkGwN4Hm5XmqGF_glD8c_aem_E9s607bk2HDYPWecW_sCow

Im a resident in the neighborhood at Collinwood drive and I'm concerned that the project will increase the risk of accidents due to increased semi-truck traffic surrounding the area. The area around Woodside and 67 North entrance already sees major traffic, with many vehicles going at high speeds, which endangers the families and kids that frequent the sidewalks, as well as bicyclists. I urge the city to not proceed with this plan as-is, or at least propose an alternative route for semi trucks from this facility to enter the 67 North, away from the residential area. I4-1

Best Regards,
Tri Dang

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Response to Comment Letter I4

Tri Dang
May 29, 2025

I4-1 The comment expresses concern regarding safety risks associated with increased truck traffic in the area and requests an alternative route for trucks from the site to northbound SR-67, one that is away from the residential area. As discussed beginning on page 4.12-12 of the Draft EIR, only 10% of truck trips are expected to head east on Woodside Avenue to access northbound SR-67. It is assumed that the majority of truck trips leaving the Project site would head west on Woodside Avenue to access SR-52 via City-designated truck routes, thereby avoiding the residential areas south and east of the Project Site. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Comment Letter I5

From: Stephanie Bowers <stephnicoleb@gmail.com>
Sent: Thursday, May 29, 2025 8:00 PM
To: Sandi Sawa
Subject: Palisades Project

Caution: The sender name (Stephanie Bowers) is different from their email address (stephnicoleb@gmail.com), which may indicate an impersonation attempt. Verify the email's authenticity with the sender using your organization's trusted contact list before replying or taking further action.

Secured by Check Point

Sandi,

I am writing as a deeply concerned resident of Santee to express my firm opposition to the Palisades Project—the proposed construction of a massive distribution warehouse near one of our city's most environmentally sensitive areas. I5-1

This project is not only ill-conceived but also represents a dangerous precedent for our community, prioritizing short-term economic gain over long-term environmental and civic well-being. The area designated for this warehouse borders a fragile ecosystem that simply cannot coexist with the around-the-clock noise, pollution, and industrial disruption that a 24/7 distribution center will inevitably bring. Once this natural space is damaged, it cannot be restored.

In addition to the environmental risks, the planned location is logistically unsound. The nearby roads were never intended to accommodate the volume and weight of heavy truck traffic this warehouse will generate. The already congested freeway will become a nightmare, especially considering the dangerously short exit ramp that is expected to handle an unrelenting stream of semi-trucks. This poses not only a traffic issue but a public safety hazard. I5-2

It is difficult to see this project as anything other than an act of corporate greed—developed with little regard for the surrounding neighborhoods, local infrastructure, or natural resources. Our community should not have to pay the price in diminished quality of life, damaged ecosystems, and hazardous roads just so a private entity can turn a larger profit.

I urge you and other city officials to reconsider the approval of this reckless and exploitative project. There must be better ways to support economic development—ones that align with our city's values, preserve its unique character, and protect the people who call it home. I5-3

Thank you for your time and attention to this important matter. I look forward to your response and to a more transparent dialogue with the community.

Sincerely,
Stephanie Bowers

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Response to Comment Letter I5

Stephanie Bowers
May 29, 2025

I5-1 The comment states that the Project borders a fragile ecosystem and that the Project will irrevocably damage this natural space. It should be noted that as stated on Draft EIR page 3-2, the Project site is within the Light industrial (IL) zoning; there is no change of use or zoning proposed. Additionally, the Project site is surrounded on three sides by industrial uses. Section 4.3, Biological Resources, of the Draft EIR evaluated potential impacts from the proposed Project on biological resources, including those located adjacent to the site. The analysis in that section concluded that with implementation of the recommended mitigation measures, the proposed Project would not have a direct or indirect significant effect on biological resources. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed project. Therefore, no further response is required.

I5-2 The comment expresses concern regarding roadway congestion, truck weight, and traffic safety hazards. Please see Thematic Response 1: Transportation for a discussion regarding transportation impacts. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed project. Therefore, no further response is required.

I5-3 The comment urges City officials to reconsider approval of the Project because of the impacts on the environment and the community. Comment noted. This comment is general in nature and does not raise a new significant environmental issue

regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Comment Letter I6

From: Dominic Daoust <dtdaoust@gmail.com>
Sent: Thursday, May 29, 2025 8:36 PM
To: Sandi Sawa
Subject: Opposition to the Palisades Project – Concern from a Disabled Veteran and Santee Resident

Dear Ms. Sawa,

My name is Dominic Daoust. I'm a disabled combat veteran, a husband, and a father of two young children. I live at 9583 E Heaney Cir here in Santee. I'm writing to express my deep concern and opposition to the proposed Palisades Project. I6-1

Even if the building won't be directly visible from my home, the size and scope of this development—300,000 square feet, 46 semi-truck docks, 24/7 operations, and a five-story height – pose a serious threat to the health, safety, and livability of our entire community. I6-2

My family moved to Santee because it offered a peaceful environment, safe streets, and a strong sense of community. The constant truck traffic this project would generate—on roads like North Woodside, which already can't handle current volume – puts families at risk. Add in the diesel exhaust, round-the-clock noise, and blocked views, and this quickly becomes a quality-of-life issue for thousands of residents. I6-3

As someone who served this country and now lives with the lasting impact of that service, I believe strongly in protecting the values we fought for—especially the right for families to live in safe, healthy, and stable communities. This project, as proposed, undermines that vision.

I respectfully urge the City to reject the Palisades Project or require a significant redesign that aligns with the needs and well-being of Santee residents.

Sincerely,

Dominic Daoust

9583 E Heaney Cir
Santee, CA 92071

Response to Comment Letter I6

Dominic Daoust
May 29, 2025

I6-1 The comment states that the proposed Project poses a threat to the health, safety, and livability of the community. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I6-2 The comment expresses concern about truck traffic, diesel exhaust, noise, and blocked views. Please see Thematic Response 1: Transportation for a discussion regarding transportation impacts. Impacts related to aesthetics and air quality are analyzed in Draft EIR Sections 4.1 and 4.2, respectively. Please see Thematic Response 2: Noise for a discussion regarding noise impacts. All impacts related to aesthetics, air quality, and noise were determined to be less than significant and no mitigation is required. This comment is general in nature and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I6-3 The comment urges the City to reject the proposed Project or require a redesign that aligns with the well-being of Santee residents. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

Comment Letter I7

[redacted]

[redacted]

-----Original Message-----
From: Jason Lewis <Jnlewis1904@hotmail.com>
Sent: Friday, May 30, 2025 9:27 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: iofbholder@gmail.com
Subject: Santee drive in development

Hello Sandi,

I would like to formally voice concerns over the development at the existing Santee drive in site. I own a home just east of city hall. The purposed warehouse will greatly impact my family and I due to the increased traffic at the already very congested Riverford and 67 intersection. I am also concerned about increased damage to the streets. Our city has a hard enough time keeping up with the repairs as it is. I would hate for the roads by my home to end up like the turn lane going into the dump, those ruts are extremely deep and can cause damage to cars. I7-1

I am also not ok with having an eyesore 50' building popping up into my panoramic view of the valley. I'm sure that will not help my property value. As it is I can hear every loud car in that area from my bedroom and I do not welcome the nuisance sounds of heavy truck operations. They are not quiet. I7-2 I7-3

Sincerely,

Jason Lewis

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Response to Comment Letter I7

Jason Lewis
June 2, 2025

I7-1 The comment expresses concern regarding increased traffic at the Riverford Road and SR-67 intersection and street damage. Please see Thematic Response 1: Transportation for a discussion regarding transportation impacts. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I7-2 The comment expresses concern about views of the proposed 50-foot tall Project building. Section 4.1, Aesthetics, of the Draft EIR evaluated the potential impacts of the Project related to scenic views, scenic resources, existing visual character, and lighting and glare. This section concluded that the proposed Project would not result in any significant impacts related to aesthetics. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I7-3 The comment states that the sound of heavy truck operations will be a nuisance. Comment noted. Section 4.10, Noise, of the Draft EIR evaluated the potential noise impacts that would result from Project construction and operation. The section concluded that the proposed project would not result in any significant impacts related to noise. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or

accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Comment Letter I8



[redacted]

[redacted]

[redacted]

[redacted]

From: Sara Hertweck <sarahertweck@gmail.com>
Sent: Friday, May 30, 2025 11:17 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Regarding the Santee Palisades Project

Ms. Sawa,

I am writing to express my deep concern for the pending Palisades Commerce Center project. The current area infrastructure is not made for the anticipated heavy semi truck traffic this project will bring. The current traffic flow is heavy and backed up during rush hour, the addition of hundreds of semi trucks would be a literal nightmare and cause the area to be in constant gridlock. I8-1

Additionally the construction of such a large multi story warehouse next to what is considered a treasured green space is horrific and unwanted. I8-2

Please consider the long term ramifications of such an enormous and ill-advised project on local and long term residential areas. I8-3

Thank you,
Sara Hertweck
812-598-1038

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Response to Comment Letter I8

Sara Hertweck
May 30, 2025

I8-1 The comment expresses concern regarding the Project, specifically current infrastructure not being able to handle heavy truck traffic. Comment noted. Please see Thematic Response 1: Transportation for a discussion regarding transportation impacts. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I8-2 The comment states that the construction of a warehouse next to green space is horrific and unwanted. Comment noted. Section 4.3, Biological Resources, of the Draft EIR evaluated potential impacts from the proposed Project on biological resources, including those located adjacent to the site. The analysis in that section concluded that with implementation of the recommended mitigation measures, the Project would not have a significant direct or indirect effect on biological resources. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I8-3 The comment urges the City to consider the Project's effects on residential areas. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

Comment Letter I9

[redacted]

[redacted]

-----Original Message-----
From: Torri Rodriguez <torri.rodriguez@yahoo.com>
Sent: Saturday, May 31, 2025 2:22 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Palisades project

Hello,

I wanted to reach out to express my extreme concern for the palisades project. The area that is zoned is for light industrial. From the proposed plans this building that is attempting to be constructed is far from light. I9-1

We have lived in santee and lakeside all our lives. This proposal will create a monstrous hub. I am extremely concerned about
- noise
- traffic congestion
- road wear and tear

The roads we have are not intended for extreme capacity semi trucks. I9-2

I do not support the construction of this.

Please advise what I can do as a citizen of santee to further attempt to stop this construction from moving forward. I9-3

Thank you,
Torri
Sent from my iPhone

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Response to Comment Letter I9

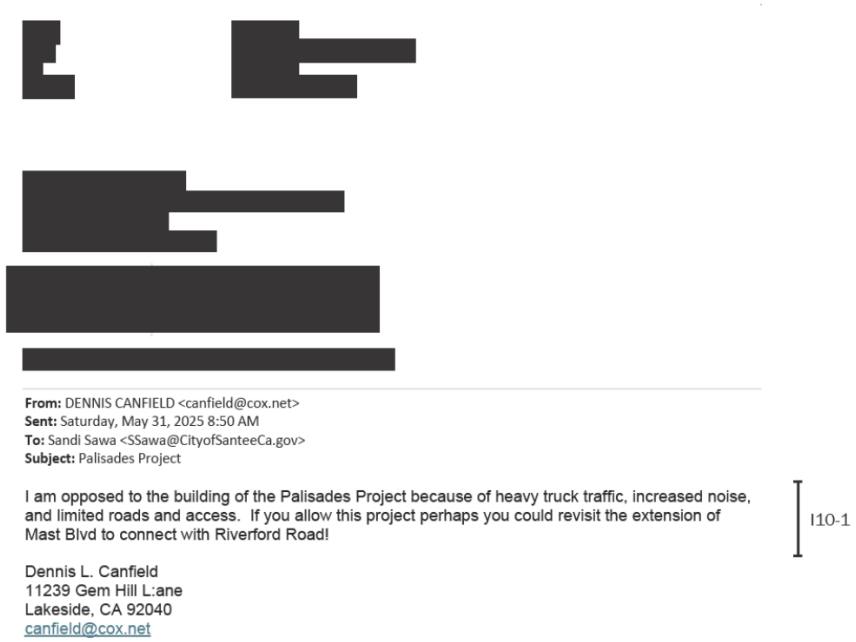
Torri Rodriguez
May 31, 2025

I9-1 The comment expresses concern that the characteristics of the proposed Project are not appropriate in the light industrial zoning. Comment noted. As discussed beginning on page 4.9-4 of the Draft EIR, the proposed Project would be consistent with Chapter 13.14 of the City's Municipal Code, which states that industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and business parks, including corporate offices, are allowed. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I9-2 The comment expresses general concerns regarding noise, traffic congestion, and road damage. Comment noted. Please see Thematic Response 1: Transportation and Thematic Response 2: Noise for information responsive to this comment. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed project. Therefore, no further response is required.

I9-3 The comment expresses a lack of support for the project. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

Comment Letter I10



[redacted]

From: DENNIS CANFIELD <canfield@cox.net>
Sent: Saturday, May 31, 2025 8:50 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Palisades Project

I am opposed to the building of the Palisades Project because of heavy truck traffic, increased noise, and limited roads and access. If you allow this project perhaps you could revisit the extension of Mast Blvd to connect with Riverford Road! I10-1

Dennis L. Canfield
11239 Gem Hill L:ane
Lakeside, CA 92040
canfield@cox.net

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Response to Comment Letter I10

Dennis L. Canfield
May 31, 2025

I10-1 The comment expresses opposition to the Project, citing concerns regarding truck traffic, noise, and limited road access. Comment noted. Please see Thematic Response 1: Transportation and Thematic Response 2: Noise for information responsive to this comment. The comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

Comment Letter I11

[redacted]

From: Alishia Prescott <bccpmom@icloud.com>
Sent: Sunday, June 1, 2025 2:58:43 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Palisades Project

Caution: The sender name (Alishia Prescott) is different from their email address (bccpmom@icloud.com), which may indicate an impersonation attempt. Verify the email's authenticity with the sender using your organization's trusted contact list before replying or taking further action.

Secured by Check Point

Dear Ms. Sawa,

As a resident of Santee, I am writing to formally express my opposition to the proposed Palisades Commerce Center project. I11-1

This industrial warehouse development is deeply concerning for several reasons, foremost among them the significant increase in commercial truck traffic it would bring to our city. Santee's existing infrastructure is not designed to accommodate high volumes of large trucks on a daily basis. The result will be congested roads, longer commutes, and a heightened risk of traffic accidents—especially in residential areas and near schools. I11-2

In addition to traffic, noise pollution from continuous commercial operations, deliveries, and loading docks would directly impact the peace and livability of our neighborhoods. The proposed location places this noise too close to residential zones and natural open spaces where many of us seek quiet and recreation. I11-3

Equally troubling is the environmental impact. An industrial center of this scale would worsen air quality, not just during construction, but permanently due to truck emissions and other pollutants. Santee already faces air quality challenges due to our surrounding I11-4

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Response to Comment Letter I11

Alishia Prescott
June 1, 2025

I11-1 The comment expresses opposition to the Project. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I11-2 The comment expresses concern regarding the increase in commercial truck traffic, which would result in congested roads, longer commutes, and safety risks. Comment noted. Please see Thematic Response 1: Transportation for a discussion regarding transportation impacts. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I11-3 The comment expresses concern about noise from operations, deliveries, and loading docks impacting residential zones and open space. Comment noted. Please see Thematic Response 2: Noise for a discussion regarding noise impacts. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I11-4 The comment expresses concern regarding worsening air quality during Project construction and operation, which would jeopardize the health of Santee residents. Comment noted. Section 4.2, Air Quality, of the Draft EIR evaluated potential impacts related to air quality during construction and operation

topography, and this project would only make it worse—jeopardizing the health of our children, seniors, and community as a whole.

This project threatens to undermine the very character of Santee: a family-oriented city that values open space, quality of life, and smart, responsible development. A large-scale industrial hub simply does not belong in this community, especially one that will bring long-term consequences with little benefit to local residents.

I respectfully urge you and all local decision-makers to oppose the Palisades Commerce Center project in its current form. Please stand with your constituents in preserving the integrity, safety, and sustainability of our city.

Thank you for your time and leadership on this matter.

Sincerely,

Alishia Prescott

Concerned Resident of Santee, CA

Sent from my iPhone

2

I11-4 Cont.

I11-5

Page 2 of 2 in Comment Letter I11

of the proposed Project. The analysis in that section concluded that Project impacts would be less than significant. Additionally, health risk assessments were performed for both construction and operation beginning on page 4.2-30 of the Draft EIR. Both assessments concluded that neither Project construction nor operation would expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I11-5 The comment states that the Project threatens to undermine the character of Santee and urges local decision-makers to reject the project. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

Comment Letter I12

[redacted]

From: Kimberly Klingensmith <kimberlyklingensmith2@gmail.com>
Sent: Monday, June 2, 2025 8:00 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Re; 300,000 sq ft warehouse at Palisade Santee Commerce Center

Hello, my name is Kimberly Klingensmith. I've lived in the Lakeside my whole life. I've watched it grow. I'm extremely concerned about the new warehouse that's going in along the 67. The traffic is horrendous just trying to get onto the freeway right there by Riverford rd. I live in Eucalyptus Hills. And I drive to work every morning . There is a new housing project going in with 175 new homes which hasn't impacted the traffic yet but it will. And there's no way we can put in a warehouse of that size and that many trucks coming and going from that warehouse it's gonna be a complete gridlock. I12-1
I'm extremely concerned about This town.
It should be illegal, trying to squeeze so much into such a small space. And not improving any roads? This is a small town. I'm so angry about this. Frustrating enough as it is.
Plus the view of this monster of the building. I know I don't have much to say, but I'm gonna see it anyways please don't build it there. I12-2

Regards Kimberly Klingensmith

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Response to Comment Letter I12

Kimberly Klingensmith
June 2, 2025

I12-1 The comment expresses opposition to the Project, citing concerns about traffic congestion from truck traffic particularly at SR-67 and Riverford Road. Please see Thematic Response 1: Transportation for a discussion regarding transportation impacts. This comment is general in nature and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I12-2 The comment expresses concern about views of the large Project building and lack of road improvements. Please see Thematic response 1: Transportation for information regarding roadway improvements. Section 4.1, Aesthetics, of the Draft EIR evaluated the potential impacts of the Project related to scenic views, scenic resources, existing visual character, and lighting and glare. The analysis in that section considered the 50-foot height of the proposed building. This section concluded that the proposed Project would not result in any significant impacts related to aesthetics. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Comment Letter I3

[redacted]

From: Vicki krismer <krismers@gmail.com>
Sent: Friday, May 23, 2025 11:23:27 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Sandi Sawa RE: Santee Palisade Project

Regarding the Santee Palisade Project Proposal in Santee, this project will have negative impacts on the Santee Community. These disruptions include negative impact to the environment, physical and mental health issues and daily life. I3-1

The South 67 off ramp and the North 67 on ramp on Riverford have become very congested areas. Riverford is on the border of Santee and Lakeside and this area has not been improved to accommodate your Santee Palisade Project. Santee and Lakeside cannot come to an agreement on which party is responsible for improving this congested area. I3-2

By approving this plan, this allows the heavy equipment to go out both ends of North Woodside, on the Mission Gorge end and Riverford. This takes away our freeway access and safety. The intersection of North Woodside and Riverford does not have sufficient space for the amount of traffic this plan will create. I3-3

Santee changed the noise level restrictions and allowed the building to be raised from 40 to 50 feet. Santee's actions have been reckless and did not take the quality of life into consideration for the residents of Santee. I3-4

Sincerely,

Vicki Krismer
9231 Northcote Road
Santee, CA 92071

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Response to Comment Letter I13

Mike Aiken
June 2, 2025

I13-1 The comment expresses support for the Project. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

- **Job Creation**: The project will create hundreds of construction jobs during development and an estimated 185 long-term, well-paying jobs upon completion.
- **Economic Growth**: With over $1.6 million in expected tax revenue over the next ten years, the project will expand the city's tax base, supporting essential services such as schools, parks, and public safety.
- **Modern Design**: The new facility will replace an unused lot with a sustainable, state-of-the-art commerce center that attracts new industry and supports business growth within Santee.
- **Compatible Location**: The site is already zoned for industrial use and is surrounded by similar uses, making this development an appropriate and compatible fit for the area.
- **Infrastructure Improvements**: The project includes much-needed improvements to Woodside Avenue, including sidewalks and street upgrades, enhancing safety and accessibility for all.

I13-1 Cont.

This development respects Santee's General Plan and zoning ordinances and represents the kind of smart, forward-thinking investment our city needs. The Palisade Santee Commerce Center will revitalize an underutilized site and contribute to a stronger, more resilient economic future for Santee.

I respectfully urge the City Council to approve this important project.

Sincerely,

Mike Aiken

2

Page 2 of 2 in Comment Letter I13

Comment Letter I14

[redacted]

-----Original Message-----
From: Jim Preihs <jimmydiego@cox.net>
Sent: Monday, June 2, 2025 1:38 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Palisades Project Distribution Hub

Dear Ms Sawa,

I am written in regards to the Palisades Project Distribution Hub that is currently under consideration by your office. I am sure it comes as no surprise the number of people that vehemently opposed this project. As a City Planner, it is your responsibility to take ALL things into consideration. Obviously the traffic side of things would be a disaster. There is no way for the traffic problems to be avoided in that area. The proposed roundabouts wouldn't even come close to fixing the problem. The number of semis using those roads would be insane and would cause huge problems. The likelihood of many more traffic accidents is also real.

Traffic in Santee in general has become so much worse and there seems to be no consideration for that as we continue to grow. The roads are old and worn and the extra traffic is just doing more damage. Don't get me wrong, I am not anti growth or a N.I.M.B.A. kind of person. I have been in the construction industry all my life. I just see that there is "planning:", the there's reality. I hope you consider this and all the other emails you'll be getting before a decision is made.

I14-1

I would love to hear from you. Also, please let me know how I can participate in any discussion regarding this project.

Thank you for your time,

Sincerely,

Jim Preihs
Santee resident since 1996

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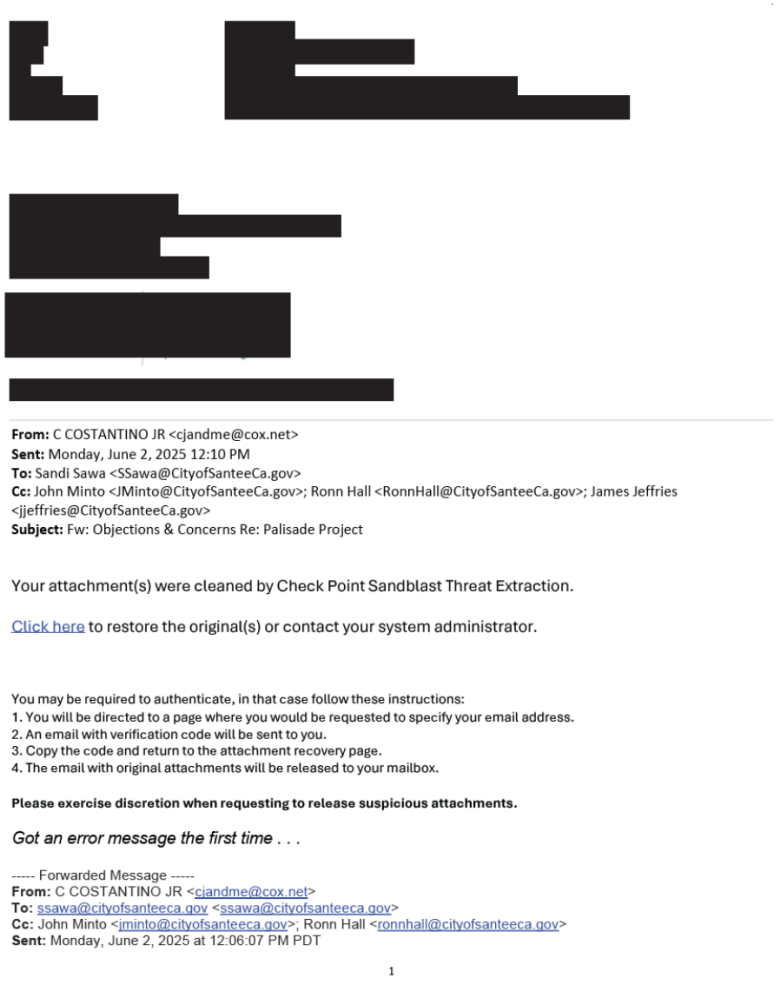
I14-1

Response to Comment Letter I14

Jim Preihs
June 2, 2025

I14-1 The comment opposes the Project, citing concerns regarding traffic, traffic accidents, and road damage. Comment noted. The comment asks how the commenter can participate in discussions regarding the Project. Please see Thematic Response 1: Transportation for information responsive to this comment. Regarding participation in discussions about the proposed Project, interested persons and organizations can participate during the public comment portion of the public hearing that will be held by the Santee City Council. The date on which the proposed Project will be heard has not yet been determined. However, a public hearing notice will be circulated and posted in accordance with City public hearing notice requirements. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Comment Letter I15



[redacted]

From: C COSTANTINO JR <cjandme@cox.net>
Sent: Monday, June 2, 2025 12:10 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: John Minto <JMinto@CityofSanteeCa.gov>; Ronn Hall <RonnHall@CityofSanteeCa.gov>; James Jeffries <jjeffries@CityofSanteeCa.gov>
Subject: Fw: Objections & Concerns Re: Palisade Project

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Please exercise discretion when requesting to release suspicious attachments.

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----- Forwarded Message -----
From: C COSTANTINO JR <cjandme@cox.net>
To: ssawa@cityofsanteeca.gov <ssawa@cityofsanteeca.gov>
Cc: John Minto <jminto@cityofsanteeca.gov>; Ronn Hall <ronnhall@cityofsanteeca.gov>
Sent: Monday, June 2, 2025 at 12:06:07 PM PDT

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Response to Comment Letter I15

Carl and Mary Costantino
June 2, 2025

I15-1 The comment states that there is an attachment to the email that contains additional concerns about truck traffic. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-2 The comment expresses opposition to the Project, stating that the proposed Project is too big for the area. Further, the comment states that while the area is zoned Light Industrial (IL), it was never designed or built for continuous heavy truck traffic resulting from a large-scale distribution hub with 46 truck loading docks. Comment noted. Please see Thematic Response 1: Transportation. Regarding use of the Project site, there is no information stating that the site would be used for a distribution center. The technical reports supporting the Draft EIR and the Draft EIR itself used assumptions based on allowed uses within the IL district. Santee Municipal Code Table 13.14.030A identifies the various permitted, conditionally permitted, and disallowed uses within the IL district. Under section B of the table, general warehousing/wholesale and distribution is shown as a permitted use within the IL zoning district. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-3 The comment states that the only way in and out (of the Project site) is via North Woodside Road, which is a two-lane road that can barely handle existing traffic congestion. Further, the

Subject: Objections & Concerns Re: Palisade Project

Please see the following. I've also attached a pdf with additional concerns regarding truck traffic . . . I15-1

To: Sandi Sawa, Director of Planning, Mayor John Minto, & the City Council of Santee

Re: Palisade Santee Commerce Center Project (SCH# 2023090144)

As a concerned, long term (45+ years) resident of the City of Santee, this letter serves to voice my strong opposition Palisade Santee Commerce Center Project, as it's currently proposed, for the following reasons: I15-2

1) **Overall –**
This Project is too big & out of scope for the area. While this area is zoned "Light Industrial", it was NEVER designed nor built for the continuous heavy Commercial Truck traffic resulting from a large-scale distribution hub with 46 Truck Loading Docks.

2) **Commercial Truck Traffic / Traffic Congestion -**
2.1 The only way in/out is via North Woodside Road, a two-lane road that can barely handle current rush hour traffic. ***(See Page 4)*** I15-3

Per the EIR, Magnolia between Mission Gorge & 52, Woodside & N Woodside will see an **increase of (66) Peak & (65) Off Peak Truck Trips**

NOTE: The EIR Traffic Study is deficient in that it does not include the east end of N Woodside, Riverford Rd/Hwy67/Woodside Rd Interchange.

2.2 The eastern access to North Woodside from Southbound Hwy 67 requires crossing several lanes of EB/WB traffic on Riverford. Access to N Woodside from SB Riverford requires a hard right turn from a single lane over the SD River Bridge. This eastern end of N Woodside is narrow, with two sharp curves. ***(See Page 5)*** I15-4

2.2.a Tuesday, 5/20/25, at 1450, the Riverford Rd, N Woodside, SB67 Off / On Ramp, Woodside Av, & NB 67 area was gridlocked. This is common.

2.2.b This intersection is already used heavily by Semi Trucks going to/from Pepsico, & the other large industrial buildings on Riverford & Mast, and will only get worse with the new buildings planned for Riverside Dr.

2.2.c NOTE: This Intersection is already a CalTrans cited "Problem Area", and will be under major reconstruction Fall 2027 thru end of 2029.

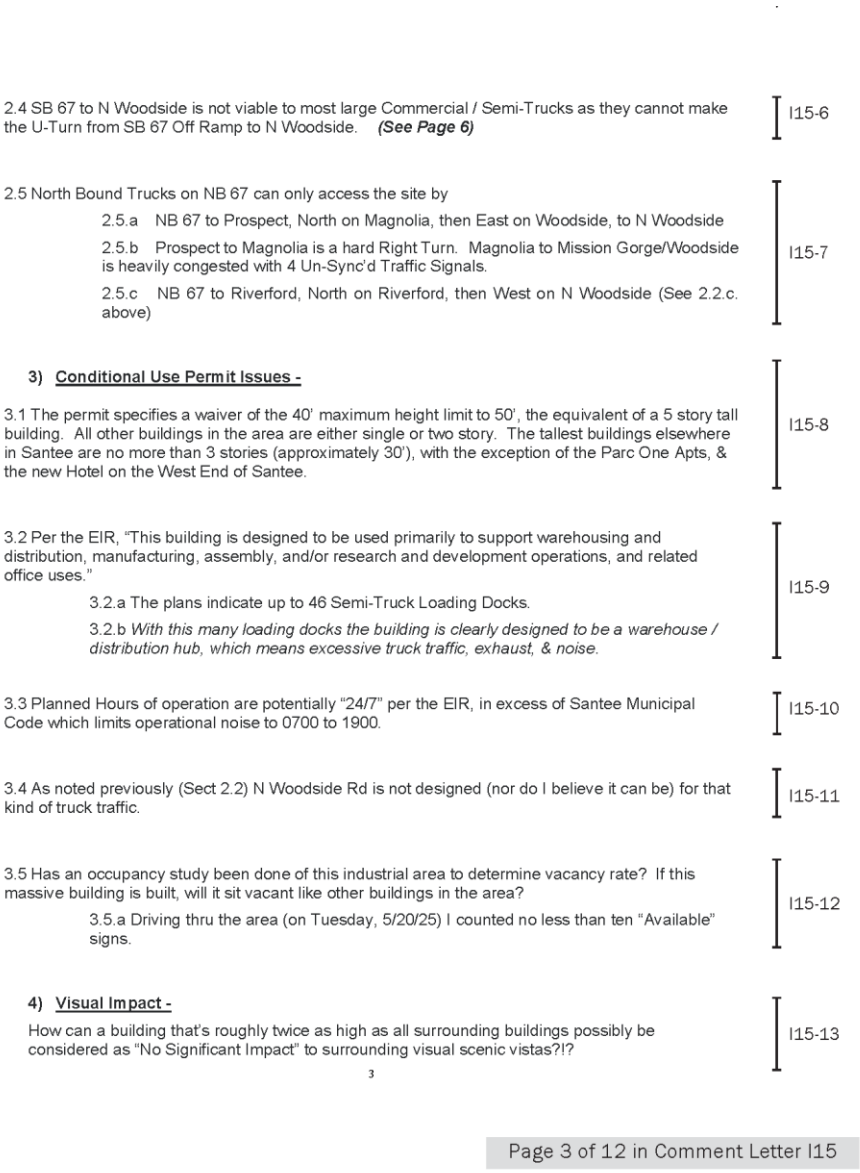
2.3 The western end is an already very busy intersection of North Woodside, "South" Woodside, & another SB Hwy 67 off ramp, onto Woodside which turns into Mission Gorge Rd. I15-5

2

Page 2 of 12 in Comment Letter I15

comment re-states information from the Draft EIR regarding the number of peak and off-peak truck trips that would be added. Finally, the comment states that the EIR traffic study is deficient because it does not include the east end of N Woodside, Riverford Road/Hwy 67/Woodside Road intersection. Please see Thematic Response 1: Transportation.

An analysis of Existing, Near Term and Horizon year analysis has been conducted for the Project's traffic study area. As noted in Section 8.3, Improvement Measures, of the TIS, the Project would construct a dedicated eastbound left turn lane at the Project Access Driveway/Woodside Avenue. This would facilitate Project traffic to enter the Project driveway from N. Woodside Avenue and reduce potential delays to through traffic along the roadway. The Project would implement MM-TRA-1 Trip Reduction Program to reduce single occupancy vehicle trips and VMT, which would reduce traffic generated from the Project. As noted in Section 6.1 Cumulative Projects of the TIS, the SR-67/Riverford Road interchange improvements, a transportation project that would consolidate three intersections into two roundabouts on Riverford Road on both sides of SR-67, is proposed approximately 1 mile north of the Project site. The Project's study area does not include Riverford Road and its intersections with SR-67 because the project would not add 50 or more peak hour trips to those facilities. However, as shown in the State Route 67 and Riverford Road Intersection Control Evaluation Report, submitted to Caltrans in 2020, with the construction of proposed roundabouts, the closely spaced intersections of the SR-67 northbound off-ramp/Woodside Avenue, Woodside Avenue/Riverford Road, and SR-67 southbound ramps/Riverford Road would operate at LOS D or better for all movements with no spillback onto SR-67 mainline. Therefore, the SR-67/Riverford Road



2.4 SB 67 to N Woodside is not viable to most large Commercial / Semi-Trucks as they cannot make the U-Turn from SB 67 Off Ramp to N Woodside. ***(See Page 6)*** I15-6

2.5 North Bound Trucks on NB 67 can only access the site by

2.5.a NB 67 to Prospect, North on Magnolia, then East on Woodside, to N Woodside

2.5.b Prospect to Magnolia is a hard Right Turn. Magnolia to Mission Gorge/Woodside is heavily congested with 4 Un-Sync'd Traffic Signals. I15-7

2.5.c NB 67 to Riverford, North on Riverford, then West on N Woodside (See 2.2.c. above)

3) Conditional Use Permit Issues -

3.1 The permit specifies a waiver of the 40' maximum height limit to 50', the equivalent of a 5 story tall building. All other buildings in the area are either single or two story. The tallest buildings elsewhere in Santee are no more than 3 stories (approximately 30'), with the exception of the Parc One Apts, & the new Hotel on the West End of Santee. I15-8

3.2 Per the EIR, "This building is designed to be used primarily to support warehousing and distribution, manufacturing, assembly, and/or research and development operations, and related office uses."

3.2.a The plans indicate up to 46 Semi-Truck Loading Docks.

3.2.b *With this many loading docks the building is clearly designed to be a warehouse / distribution hub, which means excessive truck traffic, exhaust, & noise.* I15-9

3.3 Planned Hours of operation are potentially "24/7" per the EIR, in excess of Santee Municipal Code which limits operational noise to 0700 to 1900. I15-10

3.4 As noted previously (Sect 2.2) N Woodside Rd is not designed (nor do I believe it can be) for that kind of truck traffic. I15-11

3.5 Has an occupancy study been done of this industrial area to determine vacancy rate? If this massive building is built, will it sit vacant like other buildings in the area?

3.5.a Driving thru the area (on Tuesday, 5/20/25) I counted no less than ten "Available" signs. I15-12

4) Visual Impact -

How can a building that's roughly twice as high as all surrounding buildings possibly be considered as "No Significant Impact" to surrounding visual scenic vistas?!? I15-13

3

Page 3 of 12 in Comment Letter I15

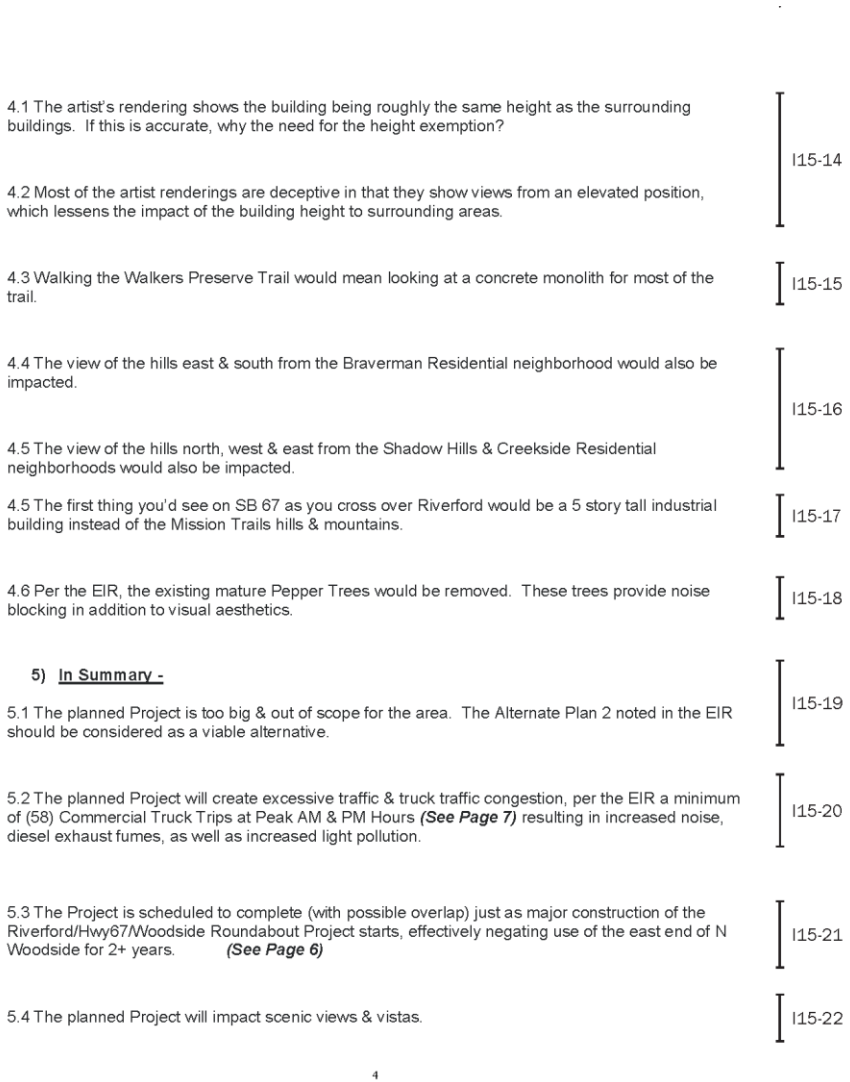
interchange project will improve LOS and traffic operations in the vicinity of the Project.

This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-4 The comment states that eastern access to North Woodside from southbound SR-67 requires crossing several lanes of traffic on Riverford Road, and a hard right turn from a single lane over the San Diego River Bridge. The comment identifies the eastern end of North Woodside Road as having two sharp curves. Further, the comment identifies the Riverford Road/North Woodside, SB-67 Off/On Ramp, Woodside Avenue and northbound SR-67 areas as frequently gridlocked and that Caltrans identifies this as a "Problem Area" with major construction planned to occur Fall 2027 till the end of 2029. Please see Response to Comment I15-3 above. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-5 The comment states that the western end is a very busy intersection of North Woodside, "South" Woodside, and another SR-67 offramp onto Woodside, which turns into Mission Gorge Road. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-6 The comment states that southbound SR-67 to North Woodside Road is not viable for most large trucks because they cannot make the U-turn from the southbound SR-67 offramp onto North



4.1 The artist's rendering shows the building being roughly the same height as the surrounding buildings. If this is accurate, why the need for the height exemption?

4.2 Most of the artist renderings are deceptive in that they show views from an elevated position, which lessens the impact of the building height to surrounding areas.

I15-14

4.3 Walking the Walkers Preserve Trail would mean looking at a concrete monolith for most of the trail.

I15-15

4.4 The view of the hills east & south from the Braverman Residential neighborhood would also be impacted.

4.5 The view of the hills north, west & east from the Shadow Hills & Creekside Residential neighborhoods would also be impacted.

I15-16

4.5 The first thing you'd see on SB 67 as you cross over Riverford would be a 5 story tall industrial building instead of the Mission Trails hills & mountains.

I15-17

4.6 Per the EIR, the existing mature Pepper Trees would be removed. These trees provide noise blocking in addition to visual aesthetics.

I15-18

5) **In Summary -**

5.1 The planned Project is too big & out of scope for the area. The Alternate Plan 2 noted in the EIR should be considered as a viable alternative.

I15-19

5.2 The planned Project will create excessive traffic & truck traffic congestion, per the EIR a minimum of (58) Commercial Truck Trips at Peak AM & PM Hours ***(See Page 7)*** resulting in increased noise, diesel exhaust fumes, as well as increased light pollution.

I15-20

5.3 The Project is scheduled to complete (with possible overlap) just as major construction of the Riverford/Hwy67/Woodside Roundabout Project starts, effectively negating use of the east end of N Woodside for 2+ years. ***(See Page 6)***

I15-21

5.4 The planned Project will impact scenic views & vistas.

I15-22

4

Page 4 of 12 in Comment Letter I15

Woodside Road. The truck trip distribution assumptions were developed using logical traffic patterns to and from the Project to access the nearest Caltrans ramps and facilities. Based on the potential destinations of trucks, it is anticipated that only a small percentage of truck traffic would travel northbound along SR-67 from the Project. As shown in the Project's TIS, the trucks to and from the Project would not generally use southbound SR-67 to N. Woodside Road. A majority of the truck would access the site by traveling along N. Woodside Avenue, using the intersection with Magnolia Avenue. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-7 The comment identifies three routes trucks traveling on northbound SR-67 can use to access the Project site. Comment noted. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-8 The comment states that the proposed Project building height would be a maximum of 50 feet, roughly equivalent to five stories, while most buildings in Santee are one or two stories with the maximum being approximately 30 feet tall. While the comment notes that most buildings in the area are one or two stories, the maximum height permitted in the IL zoning is 40 feet. The decision of whether or not to grant the permit to allow a maximum height of 50 feet is one to be made by the City Council when considering the proposed project. Note that the Draft EIR assumed a maximum building height of 50 feet, and the conclusions of the Aesthetics analysis include that maximum building height. This comment does not raise a new significant

6) Please deny the Project as submitted, & consider instead the Alternate Plan 2 noted in the EIR.

6.1 Alternate Plan 2 downsizes the project to half the size, & will still provide most all of the benefits of the large-scale project.

6.2 As noted in the EIR, Alternate Plan 2 is Environmentally & Economically Superior.

I15-23

Thank you for your time and consideration.

Sincerely,

Carl & Mary Costantino

619-871-2707

Santee Residents for 45+ years

5

Page 5 of 12 in Comment Letter I15

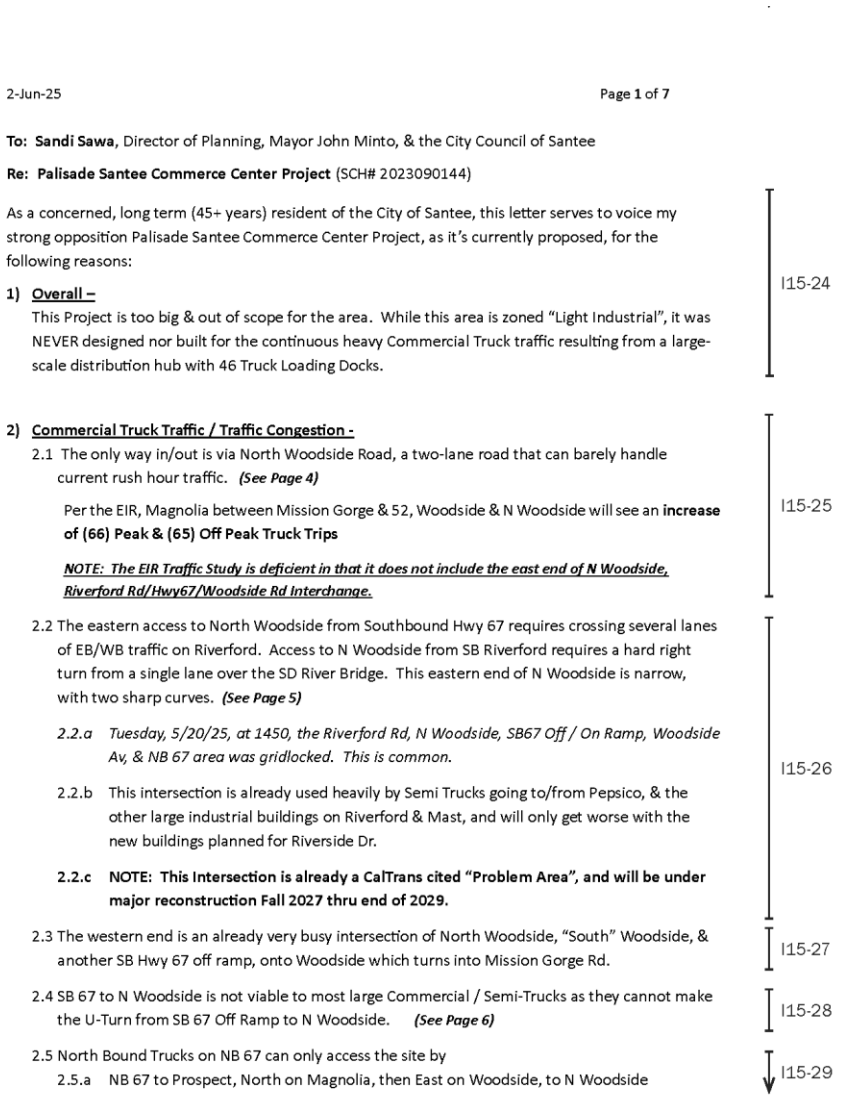
environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-9 The comment expresses the opinion that with up to 46 semi-truck loading docks, the Project is designed to be a warehouse/distribution hub. Further, the comment states that such use means excessive truck traffic, exhaust, and noise. Regarding use of the Project building and site, the Draft EIR assumed uses would be consistent with those allowed in the IL zoning. As discussed in Response to Comment I15-2 above, warehousing/distribution is a permitted use within the IL zone district. Therefore, the conclusions in the Draft EIR reflect use of the Project site consistent with allowed uses in the IL zoning. Should any uses be proposed at the Project site that are not permitted within the IL zone district, such use would be subject to an application to the City and additional CEQA review.

Regarding traffic, please see Thematic response 1: Transportation. Air quality impacts were evaluated in Section 4.2, Air Quality, of the Draft EIR. The analysis in that section demonstrated that the Project would result in less-than-significant air quality impacts and no mitigation was needed. Regarding noise, please see Thematic Response 2: Noise.

This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-10 The comment states that the Project's hours of operation would be 24/7, in excess of the Santee Municipal Code, which limits operational noise between 7:00 a.m. and 7:00 p.m. Please see Thematic Response 2: Noise for information responsive to this comment. This



2-Jun-25 Page 1 of 7

To: Sandi Sawa, Director of Planning, Mayor John Minto, & the City Council of Santee

Re: Palisade Santee Commerce Center Project (SCH# 2023090144)

As a concerned, long term (45+ years) resident of the City of Santee, this letter serves to voice my strong opposition Palisade Santee Commerce Center Project, as it's currently proposed, for the following reasons:

1) **Overall –**
This Project is too big & out of scope for the area. While this area is zoned "Light Industrial", it was NEVER designed nor built for the continuous heavy Commercial Truck traffic resulting from a large-scale distribution hub with 46 Truck Loading Docks. I15-24

2) **Commercial Truck Traffic / Traffic Congestion -**
2.1 The only way in/out is via North Woodside Road, a two-lane road that can barely handle current rush hour traffic. ***(See Page 4)***

Per the EIR, Magnolia between Mission Gorge & 52, Woodside & N Woodside will see an **increase of (66) Peak & (65) Off Peak Truck Trips** I15-25

NOTE: The EIR Traffic Study is deficient in that it does not include the east end of N Woodside, Riverford Rd/Hwy67/Woodside Rd Interchange.

2.2 The eastern access to North Woodside from Southbound Hwy 67 requires crossing several lanes of EB/WB traffic on Riverford. Access to N Woodside from SB Riverford requires a hard right turn from a single lane over the SD River Bridge. This eastern end of N Woodside is narrow, with two sharp curves. ***(See Page 5)***

2.2.a Tuesday, 5/20/25, at 1450, the Riverford Rd, N Woodside, SB67 Off / On Ramp, Woodside Av, & NB 67 area was gridlocked. This is common.

2.2.b This intersection is already used heavily by Semi Trucks going to/from Pepsico, & the other large industrial buildings on Riverford & Mast, and will only get worse with the new buildings planned for Riverside Dr. I15-26

2.2.c NOTE: This Intersection is already a CalTrans cited "Problem Area", and will be under major reconstruction Fall 2027 thru end of 2029.

2.3 The western end is an already very busy intersection of North Woodside, "South" Woodside, & another SB Hwy 67 off ramp, onto Woodside which turns into Mission Gorge Rd. I15-27

2.4 SB 67 to N Woodside is not viable to most large Commercial / Semi-Trucks as they cannot make the U-Turn from SB 67 Off Ramp to N Woodside. ***(See Page 6)*** I15-28

2.5 North Bound Trucks on NB 67 can only access the site by
2.5.a NB 67 to Prospect, North on Magnolia, then East on Woodside, to N Woodside I15-29

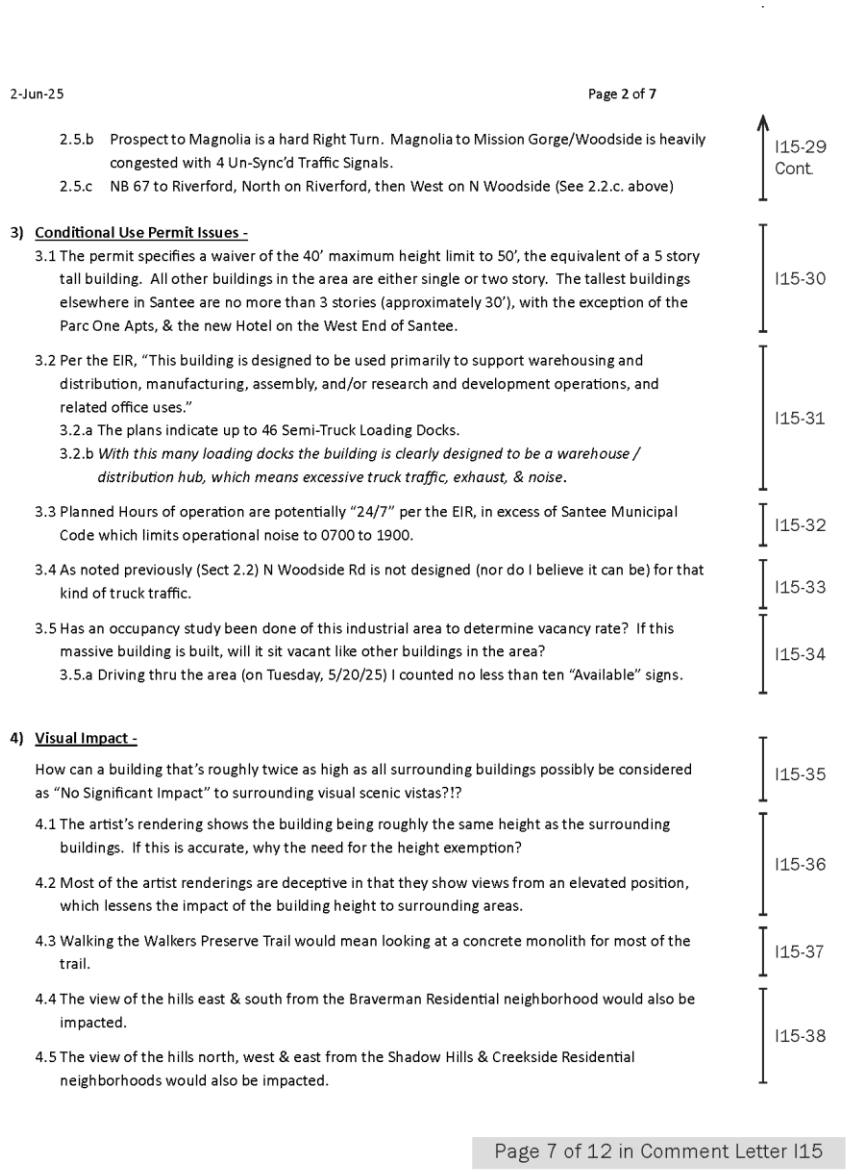
Page 6 of 12 in Comment Letter I15

comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-11 The comment states that North Woodside Road is not designed for truck trips. Please see Thematic Response 1: Transportation for information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-12 The comment questions whether an occupancy study has been conducted and whether the Project building will sit vacant. Further, the comment states that the commenter has noticed at least 10 "available" signs. Occupancy rates of buildings in the area are not an environmental impact under CEQA, and therefore was not evaluated in the Draft EIR. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-13 The comment questions how a building that approximately twice as tall as surrounding buildings could have "No Significant Impacts" to surrounding visual scenic vistas. Section 4.1, Aesthetics, of the Draft EIR evaluated the potential impacts of the Project related to scenic views, scenic resources, existing visual character, and lighting and glare. Under CEQA, views analyzed are generally those from public rights of way or from places where the views of the general public may be impacted. As discussed on Draft EIR page 4.1-7 and in Table 4.1-1, three public vantage points were selected and visual simulations were developed based on these viewpoints. The locations of representative vantage points are shown on Figure 4.1-1, Vantage Points, and



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2.5.b Prospect to Magnolia is a hard Right Turn. Magnolia to Mission Gorge/Woodside is heavily congested with 4 Un-Sync'd Traffic Signals.
2.5.c NB 67 to Riverford, North on Riverford, then West on N Woodside (See 2.2.c. above)

I15-29 Cont.

3) **Conditional Use Permit Issues -**

3.1 The permit specifies a waiver of the 40' maximum height limit to 50', the equivalent of a 5 story tall building. All other buildings in the area are either single or two story. The tallest buildings elsewhere in Santee are no more than 3 stories (approximately 30'), with the exception of the Parc One Apts, & the new Hotel on the West End of Santee.

I15-30

3.2 Per the EIR, "This building is designed to be used primarily to support warehousing and distribution, manufacturing, assembly, and/or research and development operations, and related office uses."
3.2.a The plans indicate up to 46 Semi-Truck Loading Docks.
3.2.b *With this many loading docks the building is clearly designed to be a warehouse / distribution hub, which means excessive truck traffic, exhaust, & noise.*

I15-31

3.3 Planned Hours of operation are potentially "24/7" per the EIR, in excess of Santee Municipal Code which limits operational noise to 0700 to 1900.

I15-32

3.4 As noted previously (Sect 2.2) N Woodside Rd is not designed (nor do I believe it can be) for that kind of truck traffic.

I15-33

3.5 Has an occupancy study been done of this industrial area to determine vacancy rate? If this massive building is built, will it sit vacant like other buildings in the area?
3.5.a Driving thru the area (on Tuesday, 5/20/25) I counted no less than ten "Available" signs.

I15-34

4) **Visual Impact -**

How can a building that's roughly twice as high as all surrounding buildings possibly be considered as "No Significant Impact" to surrounding visual scenic vistas?!?

I15-35

4.1 The artist's rendering shows the building being roughly the same height as the surrounding buildings. If this is accurate, why the need for the height exemption?

4.2 Most of the artist renderings are deceptive in that they show views from an elevated position, which lessens the impact of the building height to surrounding areas.

I15-36

4.3 Walking the Walkers Preserve Trail would mean looking at a concrete monolith for most of the trail.

I15-37

4.4 The view of the hills east & south from the Braverman Residential neighborhood would also be impacted.

4.5 The view of the hills north, west & east from the Shadow Hills & Creekside Residential neighborhoods would also be impacted.

I15-38

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the existing condition and 3D simulations from the three vantage points are shown on Figures 4.1-2, 4.1-3, and 4.1-4. The analysis concluded that the proposed Project would not result in any significant impacts related to aesthetics. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-14 The comment states that the renderings of the Project building show the building to be approximately the same height as surrounding buildings, and the comment questions whether this is accurate as the Project application includes a request to increase the maximum building height to 50 feet. Further, the comment states that the renderings are deceptive because they show the building from an elevated position, which appears to lessen the impact of the building height on the surrounding area. The comment is noted.

While the renderings shown in Figures 3.12a-f are mostly from elevated positions, the visual simulations shown in Figures 4.1-2 through 4.1-6 are based on ground level views. Because the proposed Project building would not substantially obstruct, interrupt, or otherwise degrade views, impacts to scenic vistas from public vantage points would be less than significant.

This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-15 The comment states that people using the Walker Preserve Trail will be looking at a concrete monolith. The comment is noted.

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4.5 The first thing you'd see on SB 67 as you cross over Riverford would be a 5 story tall industrial building instead of the Mission Trails hills & mountains. I15-39

4.6 Per the EIR, the existing mature Pepper Trees would be removed. These trees provide noise blocking in addition to visual aesthetics. I15-40

5) In Summary -

5.1 The planned Project is too big & out of scope for the area. The Alternate Plan 2 noted in the EIR should be considered as a viable alternative. I15-41

5.2 The planned Project will create excessive traffic & truck traffic congestion, per the EIR a minimum of (58) Commercial Truck Trips at Peak AM & PM Hours ***(See Page 7)*** resulting in increased noise, diesel exhaust fumes, as well as increased light pollution. I15-42

5.3 The Project is scheduled to complete (with possible overlap) just as major construction of the Riverford/Hwy67/Woodside Roundabout Project starts, effectively negating use of the east end of N Woodside for 2+ years. ***(See Page 6)*** I15-43

5.4 The planned Project will impact scenic views & vistas. I15-44

6) Please deny the Project as submitted, & consider instead the Alternate Plan 2 noted in the EIR.

6.1 Alternate Plan 2 downsizes the project to half the size, & will still provide most all of the benefits of the large-scale project.

6.2 As noted in the EIR, Alternate Plan 2 is Environmentally & Economically Superior. I15-45

Thank you for your time and consideration.

Sincerely,
Carl & Mary Costantino
619-871-2707
Santee Residents for 45+ years

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Two of the three vantage points selected for the visual simulations are from the Walker Preserve Trail, as discussed on Draft EIR page 4.1-7 and in Table 4.1-1, and shown in Figure 4.1-1. The visual simulations of these two vantage points are shown in Figures 4.1-2 and 4.1-3. As viewed from the river trail, the San Diego River riparian corridor (specifically, dense trees and shrubs) dominates the foreground and existing features on the Project site (located south of the river) do not obstruct or interrupt existing views from the trail to the San Diego River riparian corridor or background hillsides. Also, Figure 4.1-6 shows landscape sections and sightlines from the trail.

This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-16 The comment states that views from the Braverman, Shadow Hills, and Creekside neighborhoods would also be impacted. Comment noted. Please see Response to Comment I15-15 above. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-17 The comment states that the Project building would be visible from SB-67. Comment noted. As discussed on Draft EIR page 4.1-7 and in Table 4.1-1, and shown in Figure 4.1-1, visual simulations were developed from the vantage point of Northcote Road, which is on the other side of SR-67 from the Project site. That vantage point is at approximately the same elevation as SR-67, and SR-67 appears in Figure 4.1-4. The proposed building would be visible from segments of SR-67 and nearby roadways to the north including Northcote Road but the introduction of the

2-Jun-25 Page 4 of 7

Palisades Project - Large Commercial Truck Traffic Concerns



The only access to the Project Site is via North Woodside Ave, from Woodside from the West, or, Riverford from the East.

NOTE: The EIR Traffic Study is deficient in that it does not include the east end of N Woodside, Riverford Rd/Hwy67/Woodside Rd Interchange.

https://www.sandiegocounty.gov/content/sdc/dpw/roads/riverford_road_roundabouts.html

https://www.sandiegocounty.gov/content/dam/sdc/dpw/capital_projects/riverford/Riverford_Roundabouts_Project_Fact_Sheet_10.25.24.pdf

I15-46

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Project would not result in substantial blockage of a scenic vista or resource. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-18 The comment states that the pepper trees provide noise blocking and visual aesthetics. Comment noted. Please see Thematic response 2: Noise for a discussion of the noise barrier that is part of the proposed Project. . This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-19 The comment summarizes that the Project is too big and out of scope for the area and that Alternative 2 should be considered. Comment noted. Please see Response to Comment O2-8 for a discussion of Project alternatives. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-20 The comment summarizes prior comments regarding excessive traffic and truck congestion, increased noise, exhaust fumes, and light pollution. Comment noted. Please see Thematic Response 1: Transportation and Thematic Response 2: Noise. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-21 The comment states that the Project would overlap with major construction at the SR-67 interchange. See Thematic Response 1: Transportation regarding the SR-67/Riverford Road

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To get to Site from the South &/or West (I8 & SR52 to NB 67) Requires either:

From NB 67 to Prospect, or EB 52, to North on Magnolia, then East on Woodside, to N Woodside

(Prospect to Magnolia is a hard Right Turn. Magnolia to Mission Gorge/Woodside is heavily congested with 4 UnSync'd Traffic Signals)

- *Per EIR, Magnolia between Mission Gorge & 52, Woodside & N Woodside will see* ***an increase of (66) Peak & (65) Off Peak Truck Trips***

&/or

NB 67 to Riverford, North on Riverford, then West on N Woodside

- *This Intersection is already a CalTrans designated "Problem Area", and will be under major construction Fall 2027 thru end of 2029.*

I15-47

Page 10 of 12 in Comment Letter I15

interchange improvement. In its regular course of business, the City coordinates with other agencies, including Caltrans, when projects by other agencies will take place within City boundaries. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-22 The comment makes a statement that the Project will affect scenic views and vistas. Comment noted. As discussed previously, Section 4.1, Aesthetics, of the Draft EIR evaluated potential impacts to scenic views and vistas and concluded that the Project would not have a significant impact. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-23 The comment requests that the City deny the proposed Project and consider Alternative 2. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-24 The comment is identical to Comment I15-2. Please see the response to that comment.

I15-25 The comment is identical to Comment I15-3. Please see the response to that comment.

I15-26 The comment is identical to Comment I15-4 Please see the response to that comment.

2-Jun-25 Page **6** of **7**



To get to Site from the North (SB 67) Requires:

SB 67 to Riverford, North on Riverford, then West on N Woodside

- *This Intersection is already a CalTrans Designated "Problem Area", and will be under major construction Fall 2027 thru end of 2029.*
- SB 67 to Woodside is Not Viable to most large Commercial / Semi- Trucks that cannot make the U-Turn from SB 67 Off Ramp to N Woodside. See "EAST END" Photo.
- ***NOTE: The EIR Traffic Study is deficient in that it does not include the Riverford/67/Woodside Interchange.***



https://www.sandiegocounty.gov/content/sdc/dpw/roads/riverford_road_roundabouts.html

I15-48

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I15-27 The comment is identical to Comment I15-5. Please see the response to that comment.

I15-28 The comment is identical to Comment I15-6. Please see the response to that comment.**I15-29** The comment is identical to Comment I15-7. Please see the response to that comment.

I15-30 The comment is identical to Comment I15-8. Please see the response to that comment.

I15-31 The comment is identical to Comment I15-9. Please see the response to that comment.

I15-32 The comment is identical to Comment I15-10. Please see the response to that comment.

I15-33 The comment is identical to Comment I15-11. Please see the response to that comment.

I15-34 The comment is identical to Comment I15-12. Please see the response to that comment.

I15-35 The comment is identical to Comment I15-13. Please see the response to that comment.

I15-36 The comment is identical to Comment I15-14. Please see the response to that comment.

I15-37 The comment is identical to Comment I15-15. Please see the response to that comment.

I15-38 The comment is identical to Comment I15-16. Please see the response to that comment.

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Ref Pg 370 of EIR

Table 4.12-1. Project Trip Generation Summary

Land Use	Daily Trip Rate/Unit		AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
Trip Rates and Trip Generation								
Industrial Park[1]	3.37 trips/TSF		0.28	0.06	0.34	0.07	0.27	0.34
Land Use	Units	Daily						
Project (300.145 TSF)	Total Trips (non-PCE)	1,011	83	19	102	23	80	103
	Passenger Cars	*733*	*60*	*14*	*74*	*16*	*58*	*74*
	Trucks (non-PCE)	278	24	5	29	6	23	29
Trip Generation (Non-PCE)								
Vehicle Mix[2]	Passenger Cars (72.5%)	733	60	14	74	16	58	74
	2-axle Trucks (4.6%)	46	4	1	5	1	4	5
	3-axle Trucks (5.7%)	58	5	1	6	1	5	6
	4+axle Trucks (17.2%)	174	15	3	18	4	14	18
	Non - PCE Trips	1,011	83	19	102	23	80	103
Trip Generation (PCE)								
PCE Factor[3] and PCE Trips	Passenger Cars (72.5%)	733	60	14	74	16	58	74
	2-axle Trucks (4.6%)	70	6	1	7	1	6	7
	3-axle Trucks (5.7%)	115	10	2	12	2	10	12
	4+axle Trucks (17.2%)	522	45	9	54	11	42	53
	PCE Trips	1,440	121	27	148	30	116	146

Notes: TSF = thousand square feet, PCE = passenger car equivalent Some of the totals may not match exactly due to rounding.

1 Trip rates from the ITE.

2 Vehicle Mix from the SCAQMD 2014

3 Passenger Car Equivalent (PCE) factors are assumed to be 1.0 for passenger vehicles, 1.5 for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4-axle trucks.

I15-49

I15-39 The comment is identical to Comment I15-17. Please see the response to that comment.

I15-40 The comment is identical to Comment I15-18. Please see the response to that comment.

I15-41 The comment is identical to Comment I15-19. Please see the response to that comment.

I15-42 The comment is identical to Comment I15-20. Please see the response to that comment.

I15-43 The comment is identical to Comment I15-21. Please see the response to that comment.

I15-44 The comment is identical to Comment I15-22. Please see the response to that comment.

I15-45 The comment is identical to Comment I15-23. Please see the response to that comment.

I15-46 The comment provides a graphic showing access to the Project site via N. Woodside Avenue from two interchanges. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-47 The comment provides a graphic showing a hard u-turn for semi trucks making a right from the SR-67 southbound off-ramp onto N. Woodside. This comment is general in nature and does not raise a new significant environmental issue regarding the

adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I15-48 The comment provides graphics related to the Riverford Road interchange with SR-67 and states that the TIS is deficient because it does not include the Riverford Road/SR-67/Woodside Avenue interchange. Comment noted. Please see Response to Comment I15-3. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I15-49 The comment shows Draft EIR Table 4.12-1, which is the Project Trip Generation Summary, The comment does not include any additional information. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Comment Letter I16

[redacted]

-----Original Message-----
From: Torri Rodriguez <torri.rodriguez@yahoo.com>
Sent: Tuesday, June 3, 2025 3:51 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Re: Palisades project

> Hello,
>
> I wanted to reach out to express my extreme concern for the palisades project. The area that is zoned is for light industrial. From the proposed plans this building that is attempting to be constructed is far from light. I16-1
>
> We have lived in santee and lakeside all our lives. This proposal will create a monstrous hub. I am extremely concerned about
> - noise
> - traffic congestion
> - road wear and tear
>
> The roads we have are not intended for extreme capacity semi trucks. I16-2
>
> I do not support the construction of this. I16-3
>
> Please advise what I can do as a citizen of santee to further attempt to stop this construction from moving forward.
>
> Thank you,
> Torri
Sent from my iPhone

> On May 31, 2025, at 2:21 PM, Torri Rodriguez <torri.rodriguez@yahoo.com> wrote:
>
> Hello,
>
> I wanted to reach out to express my extreme concern for the palisades project. The area that is zoned is for light industrial. From the proposed plans this building that is attempting to be constructed is far from light. I16-4
>

1

Response to Comment Letter I16

Torri Rodriguez
June 3, 3035

I16-1 The comment expresses concern about the proposed Project, stating that while the zoning is Light Industrial, what is being proposed is not "light." Please see Response to Comment I9-1 and Response to Comment I15-2 regarding the permitted uses within the IL zone district. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I16-2 The comment states that the proposed Project would create a "monstrous hub" and expresses concerns about noise, traffic congestion, and road damage. Further, the comment states that local roads were not intended for so many trucks. Comment noted. Please see Response to Comment I9-2, Thematic Response 1: Transportation, and Thematic Response 2: Noise for information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I16-3 The comment states that the commenter does not support the Project and would like to know what can be done to prevent the Project from moving forward. Comment noted. Please see Response to Comment I9-3. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed project. Therefore, no further response is required. During the public hearing on the Project, members of the public can voice their concerns about the Project

> We have lived in santee and lakeside all our lives. This proposal will create a monstrous hub. I am extremely concerned about
> - noise
> - traffic congestion
> - road wear and tear
>
> The roads we have are not intended for extreme capacity semi trucks.
>
> I do not support the construction of this.
>
> Please advise what I can do as a citizen of santee to further attempt to stop this construction from moving forward.
>
> Thank you,
> Torri
> Sent from my iPhone

I16-4 Cont.

2

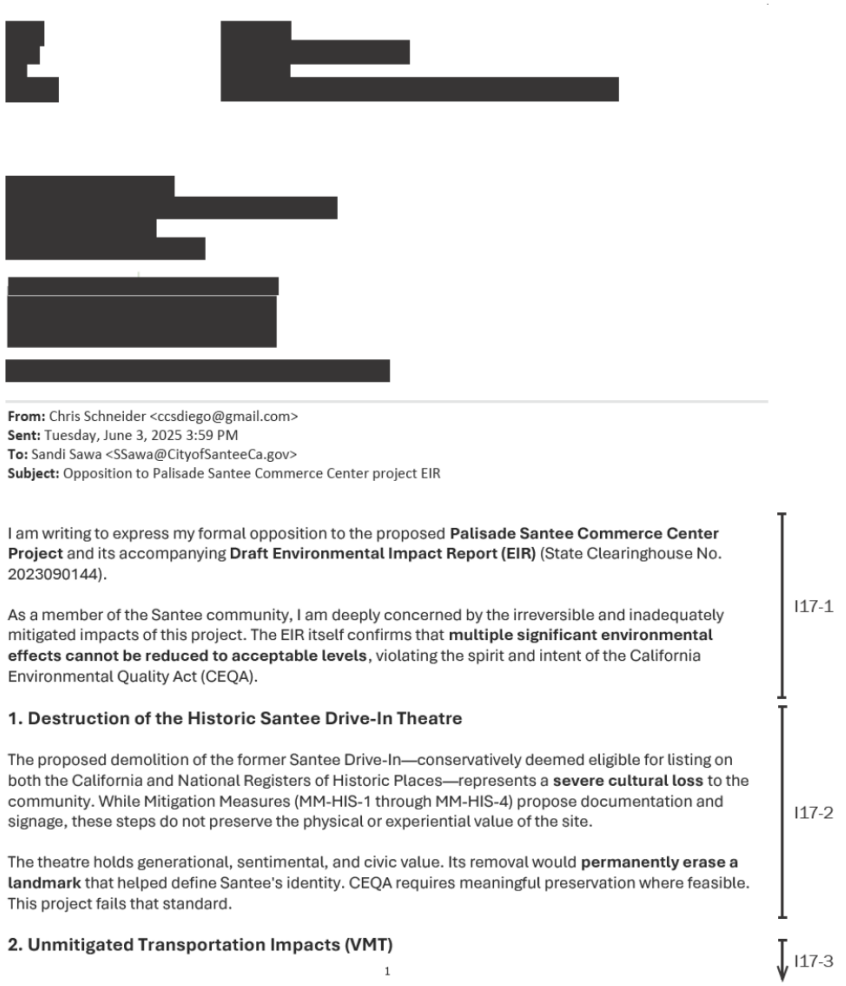
Page 2 of 2 in Comment Letter I16

I16-4

to the decisions makers. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

The comment contains the text of the commenter's first comment, Letter I9, received on May 31, 2025. Responses to this comment can be found in the responses to Letter I9. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Comment Letter I17



[redacted]

From: Chris Schneider <ccsdiego@gmail.com>
Sent: Tuesday, June 3, 2025 3:59 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Opposition to Palisade Santee Commerce Center project EIR

I am writing to express my formal opposition to the proposed **Palisade Santee Commerce Center Project** and its accompanying **Draft Environmental Impact Report (EIR)** (State Clearinghouse No. 2023090144).

As a member of the Santee community, I am deeply concerned by the irreversible and inadequately mitigated impacts of this project. The EIR itself confirms that **multiple significant environmental effects cannot be reduced to acceptable levels**, violating the spirit and intent of the California Environmental Quality Act (CEQA).

1. Destruction of the Historic Santee Drive-In Theatre

The proposed demolition of the former Santee Drive-In—conservatively deemed eligible for listing on both the California and National Registers of Historic Places—represents a **severe cultural loss** to the community. While Mitigation Measures (MM-HIS-1 through MM-HIS-4) propose documentation and signage, these steps do not preserve the physical or experiential value of the site.

The theatre holds generational, sentimental, and civic value. Its removal would **permanently erase a landmark** that helped define Santee's identity. CEQA requires meaningful preservation where feasible. This project fails that standard.

2. Unmitigated Transportation Impacts (VMT)

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I17-1

I17-2

I17-3

Response to Comment Letter I17

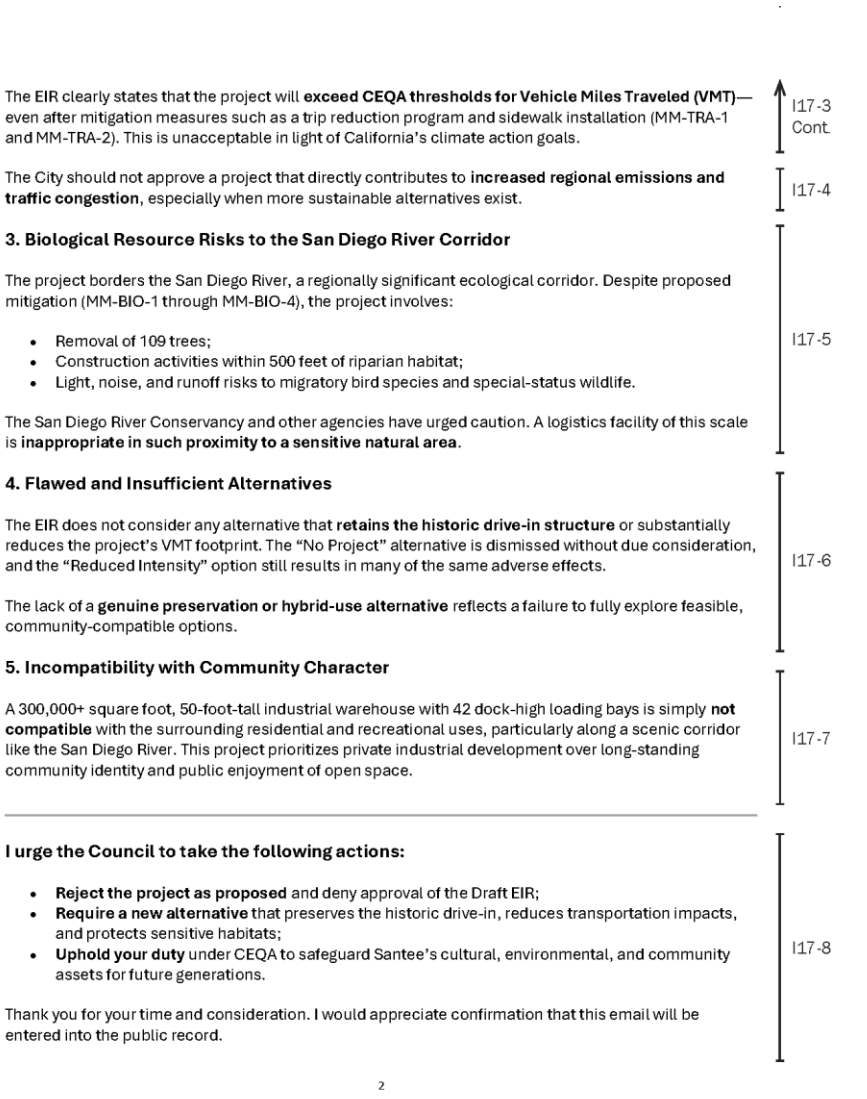
Chris Schneider
June 3, 2025

I17-1 The comment expresses opposition to the Project and notes that the Draft EIR states that some environmental impacts of the Project cannot be reduced to a less-than-significant level.

CEQA is primarily a disclosure document, requiring that all environmental impacts be disclosed prior to a lead agency making a decision on a project. Under CEQA, significant and unavoidable impacts do not preclude a project from being approved. A lead agency may choose to approve a project if it finds that there are overriding considerations that the lead agency believes would warrant approving a project. This document is called a Statement of Overriding Considerations and must be adopted by the lead agency when choosing to approve a project with significant and unavoidable environmental impacts.

In the case of the proposed Project, the City Council of the City of Santee will be making a decision whether to approve the Project. If the City Council chooses to approve the Project, a Statement of Overriding Considerations would be part of the approval documents. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I17-2 The comment states that the Project would demolish the former drive-in theater and that CEQA requires meaningful preservation where feasible. As discussed in the Historical Assessment (Appendix F of the Draft EIR) and Section 4.4 of the Draft EIR, the



The EIR clearly states that the project will **exceed CEQA thresholds for Vehicle Miles Traveled (VMT)**—even after mitigation measures such as a trip reduction program and sidewalk installation (MM-TRA-1 and MM-TRA-2). This is unacceptable in light of California's climate action goals.

I17-3 Cont.

The City should not approve a project that directly contributes to **increased regional emissions and traffic congestion**, especially when more sustainable alternatives exist.

I17-4

3. Biological Resource Risks to the San Diego River Corridor

The project borders the San Diego River, a regionally significant ecological corridor. Despite proposed mitigation (MM-BIO-1 through MM-BIO-4), the project involves:

- Removal of 109 trees;
- Construction activities within 500 feet of riparian habitat;
- Light, noise, and runoff risks to migratory bird species and special-status wildlife.

The San Diego River Conservancy and other agencies have urged caution. A logistics facility of this scale is **inappropriate in such proximity to a sensitive natural area**.

I17-5

4. Flawed and Insufficient Alternatives

The EIR does not consider any alternative that **retains the historic drive-in structure** or substantially reduces the project's VMT footprint. The "No Project" alternative is dismissed without due consideration, and the "Reduced Intensity" option still results in many of the same adverse effects.

The lack of a **genuine preservation or hybrid-use alternative** reflects a failure to fully explore feasible, community-compatible options.

I17-6

5. Incompatibility with Community Character

A 300,000+ square foot, 50-foot-tall industrial warehouse with 42 dock-high loading bays is simply **not compatible** with the surrounding residential and recreational uses, particularly along a scenic corridor like the San Diego River. This project prioritizes private industrial development over long-standing community identity and public enjoyment of open space.

I17-7

I urge the Council to take the following actions:

- **Reject the project as proposed** and deny approval of the Draft EIR;
- **Require a new alternative** that preserves the historic drive-in, reduces transportation impacts, and protects sensitive habitats;
- **Uphold your duty** under CEQA to safeguard Santee's cultural, environmental, and community assets for future generations.

I17-8

Thank you for your time and consideration. I would appreciate confirmation that this email will be entered into the public record.

2

Page 2 of 3 in Comment Letter I17

loss of the former drive-in theater would be a significant and unavoidable impact. Mitigation has been included for this impact, though mitigation would be unable to reduce impacts to a less-than-significant level due to the loss of the resources. Please see Response to Comment I17-1 for information regarding significant and unavoidable impacts. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I17-3 The comment states that the Project would exceed CEQA thresholds for VMT. Comment noted. Please see Thematic Response 1: Transportation for more information. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I17-4 The comment states that the City should not approve a project that contributes to regional emissions and traffic congestion. Comment noted. Please see Thematic Response 1: Transportation. Pollutant emissions and air quality impacts were evaluated in Section 4.2, Air Quality, of the Draft EIR. The analysis in that section demonstrated that the Project would result in less-than-significant air quality impacts and no mitigation was needed. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I17-5 The comment summarizes Project activities that would affect biological resources and states the opinion that a facility of this scale is inappropriate next to a sensitive natural area. Comment noted. Section 4.3, Biological Resources, of the Draft EIR evaluated potential impacts from the proposed Project on biological resources, including those located adjacent to the site.

Sincerely,

Chris Schneider
Santee resident

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Page 3 of 3 in Comment Letter I17

The analysis in that section concluded that with implementation of the recommended mitigation measures, the proposed Project would not have a significant direct or indirect effect on biological resources. Further, the comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

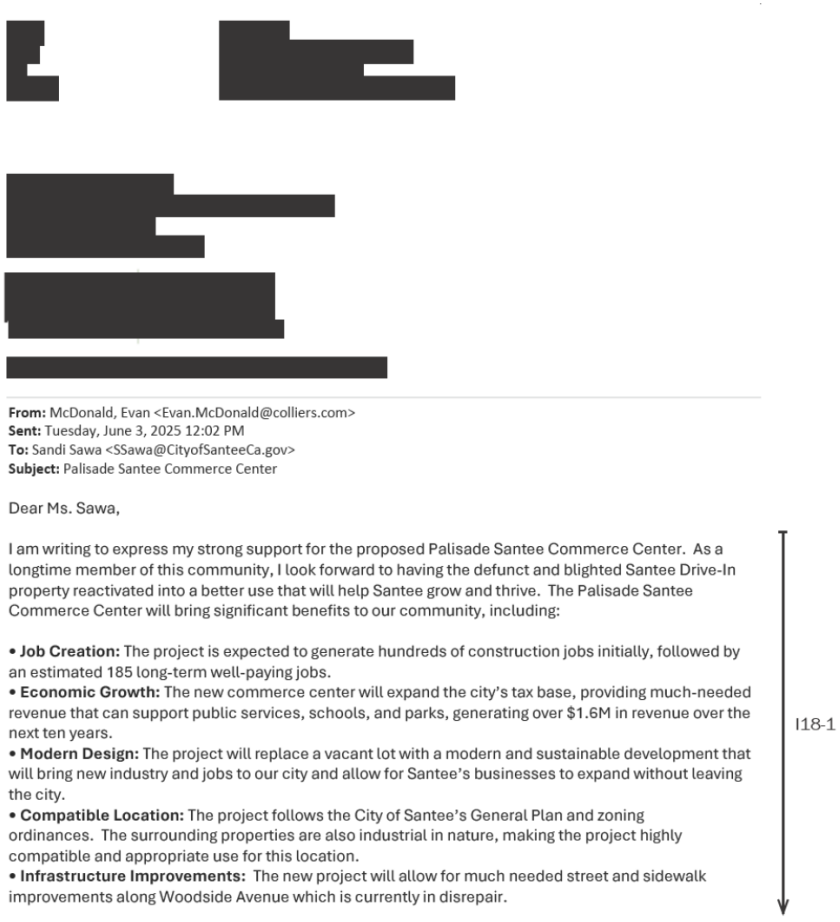
I17-6 The comment states that the EIR is deficient for not evaluating an alternative that retains the drive-in structure or reduces the Project's VMT footprint. As discussed in Response to Comment O2-8, an EIR need not include all potential alternatives. Instead, an EIR must include a reasonable range of alternatives that would obtain most of the project objectives. In this case, as discussed beginning on page 7-5 of the Draft EIR, alternative land uses and alternative sites were considered but rejected from further analysis. The alternatives carried forward for analysis in the Draft EIR represent a reasonable range of alternatives that could reduce impacts and meet Project objectives. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I17-7 The comment expresses the opinion that the Project building would be incompatible with surrounding uses, particularly along the river corridor. Comment noted. As discussed beginning on page 3-2 of the Draft EIR, the Project site is surrounded on three sides by existing light industrial development. The Project site is also within the IL zone district, which permits light industrial uses such as the proposed Project. Various sections of the Draft EIR evaluate compatibility issues, including air quality, aesthetics, and biological

resources. With the exception of historic resources and transportation, the Project would have less-than-significant impacts on the environment, which includes the surrounding community. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I17-8 The comment urges the City Council to reject the Project, require a new alternative, and safeguard Santee's cultural, environmental, and community assets. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

Comment Letter I18



[redacted]

From: McDonald, Evan <Evan.McDonald@colliers.com>
Sent: Tuesday, June 3, 2025 12:02 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Palisade Santee Commerce Center

Dear Ms. Sawa,

I am writing to express my strong support for the proposed Palisade Santee Commerce Center. As a longtime member of this community, I look forward to having the defunct and blighted Santee Drive-In property reactivated into a better use that will help Santee grow and thrive. The Palisade Santee Commerce Center will bring significant benefits to our community, including:

- **Job Creation:** The project is expected to generate hundreds of construction jobs initially, followed by an estimated 185 long-term well-paying jobs.
- **Economic Growth:** The new commerce center will expand the city's tax base, providing much-needed revenue that can support public services, schools, and parks, generating over $1.6M in revenue over the next ten years.
- **Modern Design:** The project will replace a vacant lot with a modern and sustainable development that will bring new industry and jobs to our city and allow for Santee's businesses to expand without leaving the city.
- **Compatible Location:** The project follows the City of Santee's General Plan and zoning ordinances. The surrounding properties are also industrial in nature, making the project highly compatible and appropriate use for this location.
- **Infrastructure Improvements:** The new project will allow for much needed street and sidewalk improvements along Woodside Avenue which is currently in disrepair.

I18-1

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Response to Comment Letter I18

Evan McDonald
June 3, 2025

I18-1 The comment expresses support for the Project. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

The Palisade Santee Commerce Center is exactly the kind of investment that Santee needs to ensure a strong economic future while respecting the existing zoning, community plans, and neighboring land uses.

I18-1 Cont.

I strongly encourage the city to approve this important project.

Sincerely,

Evan McDonald

Evan McDonald, SIOR
Executive Vice President | San Diego
Industrial Division
evan.mcdonald@colliers.com
CA Lic. 01813359
Direct: +1 858 677 5339 | Mobile: +1 858 353 8669
4350 La Jolla Village Drive, Suite 500 | San Diego, CA 92122 | U.S.
colliers.com | View Privacy Policy

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Comment Letter I19

[redacted]

From: Beverly Pendarvis <pendarvis1954@gmail.com>
Sent: Wednesday, June 4, 2025 2:40 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fwd: Palisades Project

Dear Ms Sawa-

I have lived in the Santee area most of my 70 years and have watched the city grow from a sleepy little town to a busy and growing city. In the early days the city council listened to the citizens, the growth was planned and was well executed. Unfortunately the city council no longer listens to what the citizens want...prime example is Fanita Ranch. This project was voted down by the citizens but the city council and the developers continue to push forward with the project. The same is true for the large buildings that are being built along Cuyamaca. The citizens voiced many concerns about the size of the buildings and more importantly the impact that the increased traffic would cause. The city council approved the project over the concerns of the citizens. With the Palisades Project it appears the city council and the developer are going to push through yet another project, this time the impact on the surrounding community will have a more severe effect. The massive five story building will be an eyesore in what was a cohesively built light industrial complex. The roads in the complex and the access roads leading to the complex were never meant to be used by semi-trucks on a 24/7 basis. The current two-lane access road can barely handle today's traffic and will certainly not be able to handle not only the semi-trucks but the additional traffic that the facility will create. The city council has asked for input from the citizens on this project. Elected officials are elected by the citizens with the belief that the council will do what is in the best interest of the citizens. One can only hope the city council listens this time.

I19-1
I19-2
I19-3
I19-4

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Response to Comment Letter I19

Beverly Pendarvis
June 4, 2025

I19-1 The comment discusses the commenter's experience living in the area and watching other projects get approved. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I19-2 The comment expresses the opinion that the Project building will be an eyesore. Comment noted. Impacts related to views and visual character of the area were evaluated in Section 4.1, Aesthetics, of the Draft EIR. The analysis in Section 4.1 determined that there would be no significant impacts and no mitigation was required. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I19-3 The comment states that local roads were not meant to be used by semi trucks on a 24/7 basis. Comment noted. Please see Thematic Response 1: Transportation for information responsive to this comment. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

I19-4 The comment expresses hope that the City Council will listen to residents. Comment noted. This comment is general in nature and does not raise a new significant environmental issue

Regards-

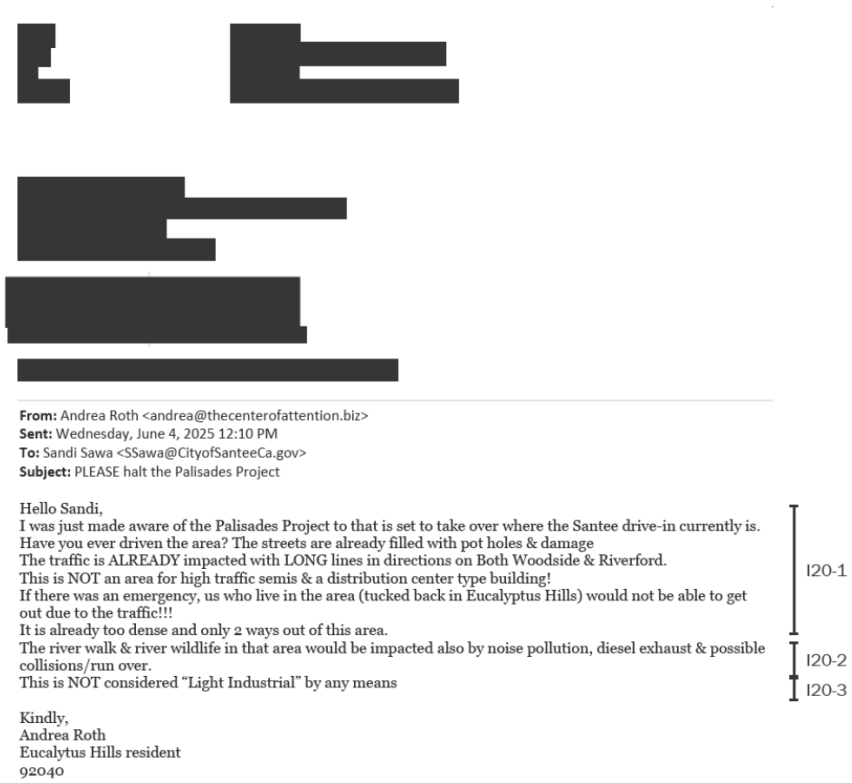
Bev Pendarvis

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Page 2 of 2 in Comment Letter I19

regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

Comment Letter I20



[redacted]

[redacted]

[redacted]

From: Andrea Roth <andrea@thecenterofattention.biz>
Sent: Wednesday, June 4, 2025 12:10 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: PLEASE halt the Palisades Project

Hello Sandi,
I was just made aware of the Palisades Project to that is set to take over where the Santee drive-in currently is. I20-1
Have you ever driven the area? The streets are already filled with pot holes & damage
The traffic is ALREADY impacted with LONG lines in directions on Both Woodside & Riverford.
This is NOT an area for high traffic semis & a distribution center type building!
If there was an emergency, us who live in the area (tucked back in Eucalyptus Hills) would not be able to get out due to the traffic!!!
It is already too dense and only 2 ways out of this area.
The river walk & river wildlife in that area would be impacted also by noise pollution, diesel exhaust & possible collisions/run over. I20-2
This is NOT considered "Light Industrial" by any means I20-3

Kindly,
Andrea Roth
Eucalytus Hills resident
92040

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Response to Comment Letter I20

Andrea Roth
June 4, 2025

I20-1 The comment expresses concern about existing road conditions, traffic congestion and emergency evacuation in the area. Please see Thematic Response 1: Transportation for more information. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I20-2 The comment states that the river area would be impacted by noise, diesel exhaust, and collisions. Please see Thematic Response 1: Transportation and Thematic Response 2: Noise. Pollutant emissions and air quality impacts were evaluated in Section 4.2, Air Quality, of the Draft EIR. The analysis in that section demonstrated that the Project would result in less-than-significant air quality impacts and no mitigation was needed. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I20-3 The comment states that the Project is not "Light Industrial" by any means. Comment noted. Please see Response to Comment I15-2 regarding the IL zone district uses. This comment does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR for the proposed Project. Therefore, no further response is required.

Comment Letter I21

[redacted]

From: Tracy Sundlun <tracysundlun@gmail.com>
Sent: Wednesday, June 4, 2025 4:05:52 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Letter of Recommendation for the Palisade Santee Commerce Center

Dear Ms. Sawa,
Please, accept the attached Letter of Recommendation for the Palisade Santee Commerce Center project. Thank you and the City for your time and consideration. I21-1

Yours truly,
Tracy

Tracy Sundlun
Anything and Everything Running, Track & Field, and Race Walking
Mobile: +1-619-726-1952
TracySundlun@gmail.com
Tracy@EverythingRunning.world

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Response to Comment Letter I21

Tracy Sundlun
June 4, 2025

I21-1 The comment introduces the attached letter or recommendation for the Project. The comment is noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

I21-2 The comment expresses support for the Project. Comment noted. This comment is general in nature and does not raise a new significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft EIR. Therefore, no further response is required.

TRACY SUNDLUN
10942 Hillcreek Road, Santee, CA 92071, 619-726-1952 (mobile), TracySundlun@gmail.com

June 4, 2025

To: SSawa@CityofSanteeCa.gov

Subject: Support for the Palisade Santee Commerce Center at 10990 N. Woodside Avenue.

Dear Ms. Sawa,

I am writing to express my strong support for the proposed Palisade Santee Commerce Center. As a resident of Santee since 2000, I look forward to having the former Santee Drive-In property relaunched and revitalized in a way that will help Santee continue to grow and thrive. The Palisade Santee Commerce Center will bring significant benefits to our community, including:

- Job Creation: The project is expected to generate hundreds of construction jobs initially, followed by an estimated 185 long-term well-paying jobs.
- Economic Growth: The new Commerce Center will expand the city's tax base, providing much-needed revenue that can support public services, schools, and parks, estimated to generate more than $1.6M in revenue over the next ten years.
- Modern Design: The project will replace a long-empty lot with a modern and sustainable development that will bring new industry and jobs to our city and allow for Santee's businesses to expand without leaving the city.
- Compatible Location: The project follows the City of Santee's General Plan and zoning ordinances. The surrounding properties are also industrial in nature, making the project highly compatible with and an appropriate use for this location.
- Infrastructure Improvements: The new project will facilitate the needed street and sidewalk improvements along Woodside Avenue.

The Palisade Santee Commerce Center is exactly the kind of investment that Santee needs to continue its growth, brightening our economic future while respecting the existing zoning, community plans, and neighboring land uses.

I strongly encourage the City to approve this important project. Thank you for your time and consideration.

I21-2

Yours truly,

Tracy Sundlun
Santee Resident and Business Owner

Comment Letter W1

June 19, 2025

Advocates for the Environment

A non-profit public interest law firm
and environmental advocacy organization

Sandi Sawa
Director of Planning and Building
City of Santee
10601 Magnolia Avenue
Santee, CA 92071

Via email to ssawa@cityofsanteeca.gov

Re: Withdrawal of Comments on Draft Environmental Impact Report for Palisade Santee Commerce Center, SCH No. 2023090144

Dear Ms. Sawa:

Advocates for the Environment submitted a comment letter on the Palisade Santee Commerce Center Project (the **Project**) on June 6, 2024. With this letter we withdraw that comment letter. We have reached a settlement agreement and no longer oppose the Project. W1-1

Please feel free to contact me if you have any questions about this withdrawal.

Sincerely,

Aria Soeprono

Aria Soeprono,
Staff Attorney, Advocates for the Environment

10211 Sunland Blvd., Shadow Hills, CA 91040 (818) 650-0030 Ext.104 as@aenv.org

Response to Comment Letter W1

Advocates for the Environment
Aria Soeprono, Staff Attorney
June 19, 2025

W1-1 The comment requests withdrawal of the comment letter previously submitted by the organization. The comment letter has been withdrawn.

Comment Letter W2

P.O. Box 79222
Corona, CA 92877

June 20, 2025
Sandi Sawa
AICP, Director of Planning &
Building
Department of Planning & Building
ssawa@cityofsanteeca.org

Re: Palisade Santee Commerce Canter (SCH NO. 2023090144)

Dear Ms. Sawa:

On behalf of the Golden State Environmental Justice Alliance ("GSEJA"), I am writing to you regarding the Palisade Santee Commerce Canter (SCH NO. 2023090144) ("Project").

GSEJA is withdrawing its comment letter and opposition to the Project. The Project's developer has addressed GSEJA's concerns about environmental mitigation.

W2-1

Golden State Environmental Justice Alliance

Joe Bourgeois
Executive Director

Response to Comment Letter W2

Golden State Environmental Justice Alliance
Joe Bourgeois, Executive Director
June 20, 2025

W2-1 The comment requests withdrawal of the comment letter previously submitted by the organization. The comment letter has been withdrawn.

Revisions to the Draft EIR

Revisions to the Draft Environmental Impact Report (Draft EIR) are noted below. An underline indicates additions to the text; ~~strikethrough~~ indicates deletions to the text. Changes have been analyzed and responded to in the second chapter of this Final EIR, Response to Comments. The changes to the Draft EIR do not affect the overall conclusions of the environmental document. Changes are listed by page and, where appropriate, by paragraph.

These revisions to the text of the Draft EIR address the technical comments on the Draft EIR, which circulated for public review from April 21, 2025, through June 4, 2025. These revisions are not considered to result in any new or substantially greater significant impacts as compared to those identified in the Draft EIR. None of the revisions constitute significant new information or substantial Project changes that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

1 Executive Summary

The text for PDF-TRA-2 on page 1-5 is revised as follows:

PDF-TRA-1 Multi-modal Intersection Improvements: Prior to the issuance of a building permit, the Project applicant will pay its traffic impact fees to the satisfaction of the City Engineer. Prior to obtaining the Certificate of Occupancy, the project will construct a new on-site sidewalk to connect the main entrance of the building with the existing sidewalk on N. Woodside Avenue. Prior to the issuance of a building permit, ~~T~~the Project applicant will also fund its fair share in the amount of $476,000 payable to the City to rehabilitate the pavement with a full width and adequate structural section on N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to the eastern most edge of the Project driveway's intersection with N. Woodside Avenue~~, to the satisfaction of the City Engineer~~. The Project applicant will install also approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk near N. Woodside Avenue's intersection with the SR-67. The Project will install "KEEP CLEAR'" pavement markings west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue.

The text of MM-TRA-2 beginning on page 1-30 is revised as follows:

MM-TRA-2. Construction of Sidewalk. The Project will construct a new sidewalk along a portion of N. Woodside Avenue to create a continuous sidewalk along N. Woodside Ave. where it intersects the SR-67. Together, with the sidewalk constructed per PDF-TRA-1, this will be a total of 990 linear feet of new sidewalk. If the applicant, despite commercially reasonable efforts, is unable to obtain the necessary permits to construct the portion of sidewalk located outside of the City of Santee's right-of-way, the applicant will have an additional six months following the issuance of the Certificate of Occupancy to complete that portion. If, at the end of that six-month period, the applicant is still unable to construct the sidewalk due to the continued inability to obtain the required permits, the applicant will pay an in-lieu fee in the amount of $50,000 to the City to complete this work.

3 Project Description

The text of PDF-TRA-1 beginning on page 3-45 is revised as follows:

PDF-TRA-1 Multi-modal Intersection Improvements: Prior to the issuance of a building permit, the Project applicant will pay its traffic impact fees to the satisfaction of the City Engineer. Prior to obtaining the Certificate of Occupancy, the project will construct a new on-site sidewalk to connect the main entrance of the building with the existing sidewalk on N. Woodside Avenue. Prior to the issuance of a building permit, Tthe Project applicant will also fund its fair share in the amount of $476,000 payable to the City to rehabilitate the pavement with a full width and adequate structural section on N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to the eastern most edge of the Project driveway's intersection with N. Woodside Avenue~~, to the satisfaction of the City Engineer~~. The Project applicant will install also approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk near N. Woodside Avenue's intersection with the SR-67. The Project will install "KEEP CLEAR'" pavement markings west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue.

4.12 Transportation

The fourth paragraph beginning on page 4.12-23 is revised as follows:

> The proposed project would result in a traffic effect at the N. Woodside Avenue/Woodside Avenue - SR-67 SB Off-Ramp intersection, under Existing plus Project, Near Term plus Project and Horizon Year plus Project conditions. The Project will pay its traffic impact fees and construct sidewalk along N. Woodside Avenue on the east, through the street's intersection with the SR-67 southbound off-ramp and then connect to the existing sidewalk on Woodside Avenue on the west and near the Project driveway, for a total of 990 linear feet or approximately 0.2 miles. In addition, the Project applicant will fund its fair share in the amount of $476,000 payable to the City to rehabilitate the pavement of N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to, on the east, the easternmost edge of the Project driveway's intersection with N. Woodside Avenue~~, to the satisfaction of the City Engineer~~. In addition, the Project applicant will construct a southbound right turn at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection subject to approval by the City and Caltrans. Additionally, the Project applicant will construct a pedestrian crosswalk with pedestrian refuge along the west leg of the intersection and reconstruct the paved sidewalk and bike lane along with other improvements, such as reconstructing storm drain outlet and pipe and protecting the existing soundwall. Based on the queuing analysis, it is also recommended that "KEEP CLEAR'" pavement markings be installed west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue. The above-mentioned improvements would be implemented as **PDF-TRA-1 Multi-modal Intersection Improvements** at N. Woodside Avenue/Woodside Avenue - SR-67 SB Off-Ramp intersection. These improvements will also ensure the Project's consistency with Policy 2.1 and is explained in detail in the TIS (Appendix L of this EIR).

The text of PDF-TRA-1 beginning on page 4.12-33 is revised as follows:

PDF-TRA-1 Multi-modal Intersection Improvements: Prior to the issuance of a building permit, the Project applicant will pay its traffic impact fees to the satisfaction of the City Engineer. Prior to obtaining the Certificate of Occupancy, the Project will construct a new on-site sidewalk to connect the main entrance of the building with the existing sidewalk on N. Woodside Avenue. Prior to the issuance of a building permit, ~~T~~the Project applicant will also fund its fair share in the amount of $476,000 payable to the City to rehabilitate the pavement with a full width and adequate structural section on N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to the eastern most edge of the Project driveway's intersection with N. Woodside Avenue~~, to the satisfaction of the City Engineer~~. The Project applicant will install also approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk near N. Woodside Avenue's intersection with the SR-67. The Project will install "KEEP CLEAR'" pavement markings west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue.

The text of MM-TRA-2 on page 4.12-35 is revised as follows:

MM-TRA 2 Construction of Sidewalk: The Project will construct a new sidewalk along a portion of N. Woodside Avenue to create a continuous sidewalk along N. Woodside Avenue where it intersects the SR-67. Together, with the sidewalk constructed per PDF-TRA-1, this will be a total of 990 linear feet of new sidewalk. If the applicant, despite commercially reasonable efforts, is unable to obtain the necessary permits to construct the portion of sidewalk located outside of the City of Santee's right-of-way, the applicant will have an additional six months following the issuance of the Certificate of Occupancy to complete that portion. If, at the end of that six-month period, the applicant is still unable to construct the sidewalk due to the continued inability to obtain the required permits, the project will pay an in-lieu fee in the amount of $50,000 to the City to complete this work.

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1 Executive Summary

1.1 Introduction

This Environmental Impact Report (EIR) has been prepared by the City of Santee (City) as lead agency pursuant to the California Environmental Quality Act (CEQA) and the CEQA. This EIR has been prepared to evaluate the environmental impacts associated with implementation of the Palisade Santee Commerce Center Project (Project).

This EIR is an informational document intended for use by the City, other public agencies, and members of the public in evaluating the potential environmental effects of the Project.

CEQA requires that local government agencies, before taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An EIR is a document designed to provide to the public and to local and state governmental agency decision makers an analysis of potential environmental consequences of a project to support informed decision making.

The City prepared this EIR to provide the public and responsible agencies information about the potential adverse impacts on the local and regional environment associated with implementation of the Project. This EIR was prepared pursuant to CEQA, codified as California Public Resources Code Section 21000 *et seq.*, and the CEQA Guidelines in the California Code of Regulations, Title 14, Section 15000 *et seq.*

This summary provides a brief synopsis of the Project, results of the environmental analysis contained within this environmental document, alternatives to the Project that were considered, and major areas of controversy and issues to be resolved by decision-makers. This summary does not contain the extensive background and analysis found throughout the individual chapters within the EIR. Therefore, the reader should review the entire document to fully understand the Project and its environmental effects.

1.2 Project Location

The Project site is located in the southeastern part of the City of Santee (City), which is located within the East County region of San Diego County, between the Pacific Ocean and the Cleveland National Forest. The City is bordered on the east by the unincorporated San Diego County communities of Lakeside and Eucalyptus Hills and the City of El Cajon to the south. The Project site is located at 10990 N. Woodside Avenue and is bounded by the San Diego River to the north; industrial buildings to the east and west; and by industrial buildings, Wheatlands Avenue, and California State Route (SR) 67 to the south. Regional access to the proposed Project is provided via SR-67 located approximately 0.1 miles south of the Project site. Local access to the Project is provided via N. Woodside Avenue.

1.3 Project Description

Project Summary

The proposed Project includes the demolition and/or removal of all existing on-site structures and the construction of a 300,145 square foot industrial/warehousing building. The Project would include 290,145 square feet of warehouse space and 10,000 square feet of office space. In addition to the industrial building, the Project would

include up to 42 dock-high doors, four grade-level doors, two truck courts, 301 passenger-vehicle parking spaces, 30- and 40-foot-wide fire access lanes along the building perimeter, landscaping, and fencing along portions of the developed perimeter with automated gates at certain driveway locations. The Project would also include associated utility, stormwater treatment, and roadway improvements (Figure 3-7, Conceptual Site Plan). This building is designed to be used primarily to support warehousing and distribution, manufacturing, assembly, and/or research and development operations, and related office uses.

The Project would include landscaping for the passenger vehicle parking area, around the portions of the building visible from off-site areas, as well as the site's frontages. Landscaping along the site's frontages would include a mixture of trees, shrubs, and groundcover. The Project would also include new sources of lighting that would be a mix of pole-mounted and wall-mounted lighting fixtures installed in parking and truck loading areas, along building exteriors, near the building office, and the site entrance off North Woodside Avenue.

The Project would be responsible for constructing frontage improvements including sidewalks along the northern side of N. Woodside Avenue and a connection to the existing sidewalk along N. Woodside Avenue that lies to the west of the Project's driveway. No sidewalk exists to the east and accordingly no new sidewalk is required to be constructed. The Project would also install a crosswalk to improve pedestrian circulation at the Project Access Driveway/N. Woodside Avenue.

The existing driveway that occupies the flag of the Project's lot between N. Woodside Avenue and the main area of the Project site would be extended to loop around the entire Project site in order to allow fire lane access from all sides of the building. The width of the internal roadway is between 30 feet to 40 feet. Signage and striping would be provided to demarcate fire lanes and clear spaces throughout the site. All gated entryways would include rapid-access Knox boxes to provide emergency access to gated areas. The Project would also include the construction of a dedicated eastbound left turn lane at the Project Access Driveway/Woodside Avenue.

In general, the Project's building has been designed such that business operations would be conducted within the enclosed building, with the exception of traffic movement, passenger and truck parking, the loading and unloading of trailers within designated truck courts/loading areas, and the internal and external movement of materials around the Project site via forklifts, pallet jacks, yard hostlers, and similar equipment. Truck trailers are expected to be primarily loaded and unloaded using the dock-high door positions in the north and south truck courts.

Project Construction

Construction is expected to commence in or around the fourth quarter of 2025 and last approximately 15 months. The duration of construction activity was estimated based on consultation with the Project Applicant and past project experience. This schedule represents a conservative analysis should construction occur any time after the respective dates, since emissions factors for construction decrease as the analysis year increases due to emissions regulations becoming more stringent. During typical Project-related construction activities, equipment is expected to operate 8 hours per day, Mondays through Saturdays, during the permitted daytime hours of 7:00 a.m. to 7:00 p.m. per Santee Municipal Code Section 5.04.090.

1.4 Project Objectives

Consistent with the Project's purpose and need, the primary objectives sought by the Project are as follows:

- **Objective 1:** Establish a jobs-producing and tax-generating commerce center land use near transportation corridors that is constructed to high standards of quality and provides diverse economic opportunities for those residing and wishing to invest within the City of Santee.
- **Objective 2:** Develop a high-quality development for uses in Santee that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar developments in the local area and region.
- **Objective 3:** Develop a facility within the East County region of San Diego County and in close proximity to SR-52 and SR-67 that can be used as part of the Southern California supply chain and goods movement network.
- **Objective 4:** Create a fiscally sound and employment-generating project within an established industrial area.
- **Objective 5:** Concentrate non-residential uses in areas designated for industrial uses which are near existing roadways, highways, and freeways in an effort to isolate and reduce any potential environmental impacts related to truck traffic congestion, air emissions, and industrial noise to the greatest extent feasible.

1.5 Project Design Features

The Project would implement the following Project Design Features (PDFs).

PDF-AQ-1: Prior to the start of construction activities and issuance of grading permits, the Project applicant, or its designee, shall ensure that all 75 horsepower or greater diesel-powered equipment are powered with California Air Resources Board (CARB)-certified Tier 4 Interim engines or better.

PDF-AQ-2: Require the cargo handling equipment utilized during facility operations after the completion of construction to include forklifts (forklifts and pallet jacks) and yard tractors operating with Tier 4 Interim engines or better.

PDF-AQ-3: During all grading and site preparation activities, the on-site construction superintendent shall ensure implementation of standard best management practices as required by the San Diego Air Pollution Control District (SDAPCD) Rules 50, 51, 52, 54 and 55, Fugitive Dust Control.

PDF-AQ-4: During all grading and site preparation activities, the on-site construction superintendent shall ensure implementation of applicable California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program Measures, as specified on the CalRecycle website.

PDF-AQ-5: The Project shall apply only coatings that meet the requirements of San Diego Air Pollution Control District's (SDAPCD) Rule 67.0.1, Architectural Coatings.

PDF-GHG-1: Per the Sustainable Santee Action Plan Checklist, the Project will include 450kW of solar PV based on 3 kW per 2,000 SF of building area.

PDF-GHG-2: Per the Sustainable Santee Action Plan Checklist, the Project will meet or exceed CALGreen Tier 2 Standards in effect at the time of the building permit application to the satisfaction of the Director of Planning and Building. Documentation shall be provided to the City demonstrating that the Project meets this requirement prior to the issuance of the building permit.

PDF-GHG-3: Per the Sustainable Santee Action Plan Checklist, the Project utilizes tree planting for shade and energy efficiency such as tree planting in parking lots and streetscapes. Landscaping will be installed in the passenger parking area and around portions of the buildings as well as site frontages, including trees, shrubs and cover. See Figure 3-9 of the Landscape Plan.

PDF-GHG-4: Per the Sustainable Santee Action Plan Checklist, roof structures will be designed to include “cool roofs” materials with a minimum aged reflectance and thermal emittance values equal to or greater than the current CALGreen Table A5.106.11.3, Tier 1.

PDF-GHG-5: Per the Sustainable Santee Action Plan Checklist, proposed Project streets will include sidewalks, crosswalks, and other infrastructure that promotes non-motorized transportation options. The Project will include street, sidewalk, and landscape improvements.

PDF-GHG-6: Per the Sustainable Santee Action Plan Checklist, electric vehicle chargers will be installed in all new commercial developments. The Project includes 16 EVCS (EV Capable Stall with EVSE).

PDF-GHG-7: Per the Sustainable Santee Action Plan Checklist, for new industrial and other Land Uses employing 200 or more employees, e-chargers shall be installed for 5 percent of the total parking spaces. The Project includes 301 total parking spaces (301 x 0.05 = 15 spaces). The Project includes 16 EVCS with EVSE.

PDF-GHG-8: Per the Sustainable Santee Action Plan Checklist, the Project will reduce waste at landfills. The Project will include storage areas for recyclables and green waste as well as food waste.

PDF-GHG-9: The Project shall utilize high-efficiency equipment and fixtures consistent with the current California Green Building Standards Code and Title 24 of the California Code of Regulations.

PDF-GHG-10: The Project shall comply with the Santee Water Efficient Landscape Ordinance. The ordinance promotes water conservation and efficiency by imposing various requirements related to evapotranspiration rates, irrigation efficiency, and plant factors.

PDF-GHG-11: The Project shall comply with Chapters 9.02 and 9.04 of the Santee Municipal Code that pertain to solid waste management and demolition and construction debris recycling.

PDF-NOI-1: The Project will construct an 8'-0" tall approximately 568-foot-long wall along the northern perimeter of the project site. A portion of this wall will include an overlapping wall section to allow for drainage and access. The Project will begin the installation of this wall concurrently with the commencement of rough grading and complete its installation prior to the start of precise grading.

PDF-TRA-1 Multi-modal Intersection Improvements: Prior to the issuance of a building permit, the Project applicant will pay its traffic impact fees to the satisfaction of the City Engineer. Prior to obtaining the Certificate of Occupancy, the project will construct a new on-site sidewalk to connect the main entrance of the building with the existing sidewalk on N. Woodside Avenue. Prior to issuance of a building permit, ~~T~~the Project applicant will also fund its fair share in the amount of $476,000 payable to the City to rehabilitate the pavement with a full width and adequate structural section on N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to the eastern most edge of the Project driveway's intersection with N. Woodside Avenue~~, to the satisfaction of the City Engineer~~. The Project applicant will install also approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk near N. Woodside Avenue's intersection with the SR-67. The Project will install "KEEP CLEAR'" pavement markings west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue.

PDF-WF-1: Prior to the start of construction activities and issuance of grading permits and consistent with the Fire Protection Technical Report prepared for the Project (see Appendix N of this Draft EIR), the Project applicant, or its designee, shall ensure that the Project includes the following fire protection and life safety features: (1) an encircling fire apparatus roadway; (2) a secure Knox box access; (3) dual fire department connections; (4) reliable water supply arrangements; (5) strategically placed fire department access points; (6) ample on-site fire hydrants; (7) an advanced ESFR sprinkler system; (8) a diesel fire pump; (9) a Class I manual wet standpipe system; (10) well-placed exits with illumination and signage; (11) readily accessible fire extinguishers; and (12) the implementation of recommended fire hazard mitigation strategies outlined in Section 7 of the Project FPP (see Appendix N of this Draft EIR).

1.6 Requested Approvals

The following discretionary and ministerial actions under the jurisdiction of the City and other agencies would be required. This EIR covers all state and local government, and quasi-government approvals that may be needed to implement the Project, whether or not they are explicitly listed in this section or elsewhere in this EIR (14 CCR 15124[d]).

City of Santee Discretionary Approval

Consistent with the City's General Plan, and Municipal Code, the Project requires certain entitlements be submitted, reviewed, and approved by the City. The requested entitlements include:

City Council

- **Certification of EIR.** The City Council to decide to certify or reject this EIR, along with appropriate CEQA Findings and the mitigation monitoring and reporting program.
- **Conditional Use Permit.** Project implementation would require approval of a Conditional Use Permit to allow for an increase in building height from the allowed 40' to 50'.
- **Development Review Permit.** Project implementation would require approval of a Development Review Permit to allow for the demolition of existing structures on site and for the development of a new industrial building greater than 50,000 square feet in floor area and associated improvements.

The City will use this EIR and associated documentation in its decision to approve or deny the required discretionary permits. Other responsible and/or trustee agencies can use this EIR and supporting documentation in their decision-making process to issue additional approvals. These additional approvals may include approvals such as a site-specific Stormwater Pollution Prevention Plan.

City of Santee Ministerial Approvals

- Permits associated with the improvements to Woodside Avenue.
- Any other ministerial actions required by the City including post-entitlement grading and building permits

Other Agency Approvals

- Proposed improvements within the Caltrans right-of-way (ROW) at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection would be subject to approval by Caltrans.
- Compliance with State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities.

1.7 Summary of Impacts

Table 1-1 presents a summary of the Project's significant environmental impacts and mitigation measures that would reduce or avoid those effects, and the level of significance of the impact after implementation of the mitigation measures. With the exception of those specific impacts identified in Table 1-1, the Project would result in less than significant or no impacts with regard to all other resource areas evaluated. Cumulative impacts of the Project were evaluated in Section 6.1, Cumulative Impacts, of the Draft EIR. For cumulative impacts that would not be significant, the cumulative impacts and their conclusions are not included in Table 1-1. For areas where the cumulative impacts would be potentially significant and would require mitigation, these impacts, mitigation measures, and conclusions are included in Table 1-1.

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
Aesthetics			
Would the Project have a substantial adverse effect on a scenic vista?	Less-than-significant	N/A	Less-than-significant
Would the Project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	N/A	No Impact
In non-urbanized areas, would the Project 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 points). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	Less-than-significant	N/A	Less-than-significant
Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less-than-significant	N/A	Less-than-significant
Air Quality			
Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Less-than-significant	N/A	Less-than-significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
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?	Less-than-significant	N/A	Less-than-significant
Would the Project expose sensitive receptors to substantial pollutant concentrations?	Less-than-significant	N/A	Less-than-significant
Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less-than-significant	N/A	Less-than-significant
Biological Resources			
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?	Potentially significant impact	**MM-BIO-1. Pre-Construction Nesting Bird Survey.** Construction within all potential nesting resource areas within the Project site (i.e., non-native woodland areas and ornamental trees) and areas of the Project site within 500 feet of the San Diego River should be avoided during the migratory bird nesting season (typically January 1 through September 30). If construction activities (i.e., grading, tree removal, external construction involving heavy equipment generating noise in excess of 60dBA (leq)) must occur during the bird nesting season, an avian nesting survey of all potential nesting resource areas (e.g., non-native woodland areas and ornamental trees) within the Project site and areas of the San Diego River within 500 feet of all impact areas must be conducted to determine the presence/absence of special-status species, protected migratory birds, and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 14 days prior to the start of construction and one more survey pass within 24 hours of initiation of construction activities in accordance with the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5, and 3513. If construction activities are on hold for more than 30 days,	Less-than-significant impact with mitigation incorporated

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		then pre-construction surveys would need to be reinitiated. If an active bird nest is found, the nest shall be flagged and mapped on the construction plans, along with an appropriate buffer established around the nest, which will be determined by the biologist based on the species' sensitivity to disturbance (typically 300 feet for passerines and 500 feet for raptors and special-status species), existing nearby conditions (e.g., natural habitat versus roads or existing noisy activities), existing buffering features (e.g., topography, tall and dense trees, buildings), legal status of species (i.e., listed versus non-listed), general sensitivities of the species (e.g., disturbance tolerant or urban versus non disturbance tolerant), and other variables. The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. On-site construction monitoring shall also be conducted when an active nest buffer is in place. No Project activities shall encroach into established buffers without the consent of a monitoring biologist. The buffer shall remain in place until it is determined that the nestlings have fledged and the nest is no longer active. **MM-BIO-2. Construction-Related Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources.** Prior to approval of grading plans and issuance of a grading permit, construction plans and conditions of approval shall include the following to address potential indirect impacts to special-status species occurring within all suitable habitat associated with the San Diego River corridor (i.e., within 500 feet of the Project site): ▪ **Biological Monitoring.** A qualified Project biologist approved by the City of Santee shall monitor ground-disturbing and vegetation clearing activities for the duration of the Project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat, species of concern, and other sensitive biological resources outside the Project footprint. Once ground-disturbing and vegetation clearing activities are complete, the Project biologist shall conduct weekly checks to inspect construction fencing and ensure that all applicable requirements from the mitigation measures are being upheld.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		▪ **Worker Environmental Awareness Training.** Prior to grading, a pre-construction meeting shall be required that includes a training session for Project personnel by a qualified biologist. The training shall include (1) a description of the species of concern and its habitats; (2) the general provisions of the applicable regulations pertaining to biological resources, including the Endangered Species Act and the Clean Water Act; (3) the need to adhere to the provisions of the Endangered Species Act, the Clean Water Act, and other applicable regulations; (4) the penalties associated with violating the provisions of the Endangered Species Act, Clean Water Act, and other applicable regulations; (5) the general measures that are being implemented to conserve the species of concern as they relate to the Project; and (6) the access routes to and Project site boundaries within which the Project activities must be accomplished. Additionally, the training shall include the measures and mitigation requirements for the applicable resources. Copies of the mitigation measures and any required permits from the resource agencies shall be made available to construction personnel. ▪ **Delineation of Property Boundaries.** Before beginning activities that would cause impacts, the contractor shall, in consultation with the biological monitor, clearly delineate the boundaries with fencing, stakes, or flags, consistent with the grading plan, within which the impacts will take place. All impacts outside the fenced, staked, or flagged areas shall be avoided, and all fencing, stakes, and flags shall be maintained until the completion of impacts in that area. In addition, any avoided environmental resources shall be clearly delineated. Prior to implementing construction activities, the biological monitor shall verify that the flagging clearly delineates the construction limits and any sensitive environmental resources to be avoided. ▪ **Standard Dust Control Measures.** Standard dust control measures as per the San Diego County Air Pollution Control District shall be implemented to reduce impacts on nearby plants and wildlife. Measures include controlling speed to 15 miles per hour or less on unpaved roads, replacing ground cover in disturbed areas as quickly as possible, frequently watering active work sites, installing shaker plates, and suspending excavation and grading operations during periods of high winds.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		▪ **Stormwater Pollution Prevention Plan.** Prior to issuance of a grading permit for construction, the applicant shall submit a Stormwater Pollution Prevention Plan (SWPPP) to the City of Santee that specifies best management practices to prevent all construction pollutants from contacting stormwater, with the intent of keeping sedimentation or any other pollutants from moving off site and into receiving waters. The requirements of the SWPPP shall be incorporated into design specifications and construction contracts. Best management practice categories employed on site shall include erosion control, sediment control, and non-stormwater good housekeeping. Best management practices recommended for the construction phase shall include, but not be limited to, the following: - Limiting grading to the minimum area necessary for construction, operation, and decommissioning of the Project. - Limiting vegetation disturbance/removal to the maximum extent practicable. - Implementing fiber rolls and sandbags around drainage areas and the site perimeter. - Stockpiling and disposing of demolition debris, concrete, and soil properly. - Installing a stabilized construction entrance/exit and stabilizing disturbed areas. - Installing proper protections for fueling and maintaining equipment and vehicles. - Managing waste, aggressively controlling litter, and implementing sediment controls. - Stabilizing soil in disturbed areas through revegetation. The following water quality measures shall be included in the SWPPP: ▪ Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		▪ The Project shall be designed to avoid the placement of equipment and personnel within the stream channel or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern, as feasible. Project activities that cannot be conducted without placing equipment or personnel in sensitive habitats shall be timed to avoid the breeding season of riparian species. ▪ Water pollution and erosion control plans shall be developed and implemented in accordance with the Regional Water Quality Control Board. ▪ **Minimize Spills of Hazardous Materials.** All vehicles and equipment shall be maintained in proper condition to minimize the potential for fugitive emissions of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. Hazardous spills shall be immediately cleaned up and the contaminated soil shall be properly handled and disposed of at a licensed facility. Servicing of construction equipment shall take place only at a designated staging area. The staging area will be located on the south side of the Project site, away from the San Diego River, and no stockpiles will be allowed adjacent to the San Diego River corridor. ▪ **Wildlife Hazards.** The following measures shall be implemented to ensure that wildlife do not become trapped, entangled, injured, or poisoned by construction activities: - Structures in which wildlife may become trapped (e.g., open pipes, pits, trenches) shall be tightly covered at the end of each work day. If covering the structure is not possible, an escape ramp shall be provided to allow any wildlife that falls in to safely escape. - Debris piles, construction materials, equipment, and other items that may be used as wildlife refuge shall be inspected for wildlife at the start of each work day and prior to disturbance. If wildlife is discovered, it shall either be moved out of harm's way by a qualified biologist or allowed to move off of the Project site on its own. - Nets and mesh shall be made of loose weave material that is not fused at the intersections of the weave because nets with welded weaves present an entanglement risk.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		- Toxic materials and garbage shall be removed from the work site and safely stored or disposed of at the end of each work day. ▪ **Invasive Weeds.** To reduce the spread of invasive plant species, landscape plants shall not be on the most recent version of the California Invasive Plant Council's Invasive Plant Inventory (http://www.cal-ipc.org/ip/inventory/index.php). ▪ **Night Work.** All construction activities shall be conducted during the daytime, and lights shall not be kept on overnight in the construction area, as practicable. If night lighting is required during construction activities, all exterior lighting along undeveloped land shall be fully shielded and directed downward in a manner that will prevent light spillage or glare into the adjacent open space. **MM-BIO-3: Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources.** Prior to approval of grading plans and issuance of a grading permit, construction plans and conditions of approval shall include the following to address potential indirect impacts to special-status species occurring within all suitable habitat associated with the San Diego River corridor (i.e., within 500 feet of the Project site): ▪ **Runoff:** Future development within 500 feet of suitable habitat for special-status species shall incorporate measures, including measures required through the National Pollutant Discharge Elimination System, to ensure that the quantity and quality of runoff discharged is not altered in an adverse way when compared with existing conditions. In particular, measures such as an infiltration system designed to capture and treat stormwater pollutants, consistent with commercial/industrial developments and associated parking lots, and including oil, grease, metals, trash, and debris, shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into proposed open space or suitable habitat for special-status species. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials, or other elements that might degrade or harm biological resources or ecosystem processes. This can be accomplished using a variety of methods, including natural detention basins, grass swales, or mechanical trapping devices.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		Regular maintenance shall occur to ensure effective operation of runoff control systems. ▪ **Lighting:** Project lighting would be designed consistent with the requirements of Section 13.30.030(B) of the Santee Municipal Code. Night lighting shall be directed away from proposed open space and/or suitable habitat for special-status species to protect species from direct night lighting. Shielding, including use of light controlling devices such as light guards, shall be incorporated in Project designs to ensure that ambient lighting is not increased. ▪ **Invasive Species:** Landscape Plans shall incorporate native species that occur in the region. Invasive, non-native plant species listed on the most recent California Invasive Plant Council's Invasive Plant Inventory (https://www.cal-ipc.org/plants/inventory/) with a rating of moderate or high shall not be included in landscaping. ▪ **Barriers:** The proposed Project shall incorporate barriers, where appropriate, to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping in open space and/or suitable habitat for special-status wildlife (e.g. San Diego River corridor). Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage, and/or other appropriate mechanisms. **MM-BIO-4: Tree Replacement, Encroachment, and Preservation.** Prior to approval of grading plans and issuance of a grading permit, construction plans, conditions of approval, and the Project's Landscape Plan shall include the following to address tree removal, encroachment into protected zone, and retained trees: ▪ **Replacement:** The proposed site plan would require removal of 109 trees. Tree replacement shall occur at a 1:1 mitigation ratio with 15-gallon trees and be included in the Project's Landscape Plan, which shall also include recommendations for long-term maintenance and care for regulated trees that will be retained on site.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		▪ **Encroachment into Protected Zone and Retained Trees:** The Project would encroach upon 24 trees and preserve 7 trees. As such, the recommendations provided in the Tree Protection Measures from the Arborist Report for the Palisade Santee Commerce Center Project (prepared by Dudek in April 2023) designed to mitigate impacts from construction encroachment into the protected zone of the preserved and encroached upon trees shall be implemented. These Tree Protection Measures are consistent with best management practices for tree protection on construction sites and would help minimize impacts to preserved and encroached trees. These measures shall be implemented prior to, during, and following construction. This includes measures such as exclusion fencing and worker training to avoid direct impacts to trees, and measures such as irrigation and monthly inspections by a certified arborist to promote the long-term health of retained trees.	
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 Game or U.S. Fish and Wildlife Service?	Potentially significant impact	MM-BIO-2 MM-BIO-3	Less-than-significant impact with mitigation incorporated
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?	Potentially significant impact	MM-BIO-2 MM-BIO-3	Less-than-significant impact with mitigation incorporated

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
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?	Potentially significant impact	MM-BIO-2 MM-BIO-3	Less-than-significant impact with mitigation incorporated
Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Potentially significant impact	MM-BIO-4	Less-than-significant impact with mitigation incorporated
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?	Less-than-significant	MM-BIO-2 MM-BIO-3	Less-than-significant impact with mitigation incorporated
Would the Project have a cumulative effect on biological resources?	Potentially significant impact	MM-BIO-1 MM-BIO-2 MM-BIO-3 MM-BIO-4	Less-than-significant impact with mitigation incorporated
Cultural, Tribal Cultural, and Paleontological Resources			
Would the Project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section §15064.5?	Potentially significant impact	**MM-HIS-1. Historical American Building Survey (HABS).** Prior to the issuance of a demolition permit, the Applicant shall submit a Historic American Buildings Survey (HABS) Level II to the City of Santee for review and approval. This mitigation measure will provide an in-depth record of the Property's current state, including high-resolution photographs, detailed architectural drawings, and text explaining the drawings and photographs. The (HABS) Level II survey will	Significant and unavoidable impact

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		help preserve a visual and documented history of the Property that may otherwise be lost after demolition. The submitted documentation not only serves to memorialize the Property for future generations but also allows for a future public appreciation of the Property's significance within the community. The HABS documentation shall explicitly illustrate the significance of the Santee Drive-In Theatre for archival purposes, as specified below. The HABS will be made available for archival storage to the San Diego County Public Library, the San Diego History Center (SDHC), and the City of Santee. The HABS and shall include the following: ***A. Drawings.*** The HABS documentation shall include measured drawings, including Site Plan, Elevations, and known Construction Details prepared for the following structures/objects: Entrance Sign; Concessions Building; Movie Screens; and Ticket Booths. ***B. Photographs.*** The HABS documentation shall include professional-quality photographic documentation of the Entrance Sign; Concessions Building; Movie Screens; and Ticket Booths prior to any construction on the Property. The photographs should be 35-millimeter black-and-white photographs; 4x6-inch standard format; taken of all four structure/object exterior elevations; and be of archival quality and easily reproducible. Once the HABS documentation is deemed complete, one set of original HABS photographs shall be submitted for archival storage to the San Diego County Public Library, the San Diego History Center, and the City of Santee. C. ***Written History and Description***. The HABS documentation shall include a written history and description of the Santee Drive-In Theatre, developed in accordance with standards and format meeting the Department of the Interior's National Park Service requirements. The history will begin with a statement of significance supported by the development of the architectural and historical context in which the site was originally constructed and subsequently evolved. The written history will also include an architectural description and bibliographic information. The written history and description will also include a methodology section specifying the name of the researcher, date of research, and sources consulted.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		MM-HIS-2. Interpretative Display. Prior to the issuance of the certificate of occupancy for the Project, the Applicant shall work with the City of Santee to create an approximately 24-inch by 48-inch metal plaque or display outlining the history of the Santee Drive-In Theatre, including events and activities associated with the site. The Applicant shall submit a plan to the City showing the location, size and content of the Interpretive Display. Upon request, the interpretive material shall be made available to schools, museums, archives and curation facilities, libraries, nonprofit organizations, the public, and other interested agencies. Prior to issuance of the certificate of occupancy for the Project, the Interpretive Display shall be installed by the Applicant on the Property or at the new location of the Entrance Sign, as described below. If the Interpretive Display is located on the Property, the Applicant shall record a covenant indicating that the property owner is responsible for implementing the long-term management of the Interpretive Display. If, at the City's discretion, the Interpretive Display is located on off-site property owned by the City, the City shall assume long-term management of the Interpretive Display. The interpretive display is intended to be placed near the final location of the Entrance Sign, which, as described under Mitigation Measure MM-HIS-3, will either be preserved on-site or relocated to an off-site location. By situating the interpretative display in proximity to the Entrance Sign, the public will be able to gain a deeper understanding of the significance of the Santee Drive-In Theatre, its role in the community, and its history while enjoying the visual backdrop of the Entrance Sign. The combination of the interpretive display and the Entrance Sign will provide visual interest to the community while providing a written context to serve as an educational resource for the community. **MM-HIS-3. Rehabilitation & Relocation of the Entrance Sign.** The City and the Applicant may mutually agree to either preserve the Entrance Sign on the Property or relocate it to a City-owned property within the Arts and Entertainment neighborhood. Prior to the issuance of a demolition permit for the Project, the Applicant shall submit a plan to the City of Santee for approval to rehabilitate and temporarily store the Entrance Sign, which consists of the neon tubing outlining the word "Santee," the neon star, and the marquee. The plan, which is	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		to be approved by the City, shall include information and details related to the rehabilitation, temporary storage and ultimate location of the Entrance Sign. Rehabilitation and storage of the Entrance Sign will be undertaken by the Applicant in a manner consistent with the Secretary of the Interior's Standards or other applicable industry standards. If the Entrance Sign is located on the Property, the Applicant shall record a covenant indicating that the property owner is responsible for implementing the long-term management of the Entrance Sign. If the Entrance Sign is located on off-site property owned by the City, the City shall assume long-term management of the Entrance Sign. If the City elects to require the Applicant to place the Entrance Sign and/or interpretative display on a City-owned off-site property, and the City, despite the Applicant's commercially reasonable efforts and through no fault of the Applicant, fails to provide the necessary authorization for the Applicant to begin the relocation of the Entrance Sign prior to the issuance of a Certificate of Occupancy for the project, the City shall not withhold the issuance of the Project's Certificate of Occupancy. Prior the issuance of a Certificate of Occupancy, the City and the Applicant shall mutually determine to reinstall the rehabilitated Entrance Sign at an appropriate location on the project site that is visible to the public from Woodside Avenue with recordation of a covenant by the Applicant indicating that the property owner is responsible for implementing the long-term management of the Entrance Sign. Alternatively, the City and the Applicant shall mutually determine an extended temporary storage plan for the sign with a security from the Applicant to complete the relocation after issuance of the Certificate of Occupancy or an Applicant provided funding mechanism for the City to complete this work. The Entrance Sign is one of the most recognizable visual elements of the Santee Drive-In Theatre. Preserving this sign as a tangible, physical object ensures that the history of the Drive-In Theatre remains in order to be appreciated and viewed by the public. The Entrance Sign will provide a direct nexus to the history of the Drive-in Theatre and as outlined in Mitigation Measure MM-HIS-2, and the Entrance Sign will be complemented by an Interpretive Display. Together, the Entrance Sign and the Interpretive Display will provide historical context, detailing the Drive-In Theatre's history.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		MM-HIS-4. Historical Preservation Funding. In the event the Interpretive Display and Entrance Sign are relocated to City property, the City will be responsible for the long-term management of the Interpretive Display and Entrance Sign. Accordingly, if the Interpretive Display and Entrance Sign are located on City property or moved off of the Project site, after the Applicant completes the rehabilitation, storage, and relocation, the Applicant shall provide a donation to the City of Santee in the amount of $7,500 (seven thousand five hundred dollars) which is intended to fund the long-term management of the interpretive display and Entrance Sign by the City.	
Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	Potentially significant impact	**MM-CUL-1.** In order to mitigate impacts to cultural resources to a level that is less than significant, procedures for proper treatment of unanticipated archaeological finds must comply with the California Environmental Quality Act (CEQA) Guidelines. Adherence to the following requirements during initial earth-disturbing activities will assure the proper treatment of unanticipated archaeological or Native American cultural material: 1. An archaeological monitor and a Kumeyaay Native American monitor shall be present full-time during all initial ground-disturbing activities. If proposed project excavation later present evidence suggesting a decrease in cultural sensitivity, the monitoring schedule can be reduced pending archaeological, Native American, and City consultation. 2. In the event that there is an unanticipated discovery of potentially significant archaeological resources, the archaeological monitor, Native American monitor, construction or other personnel shall have the authority to divert or temporarily halt ground disturbance operations within at least 50 feet (dependent on characteristics of the discovery) in the area of the find. Construction activities may continue in other areas but should be redirected a safe distance from the find. The archaeological monitor shall evaluate and minimally document isolates and clearly non-significant deposits in the field. If the discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. A data recovery plan shall be developed by the qualified archaeologist in consultation with the City and Native American	Less-than-significant impact with mitigation incorporated

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		representatives, if applicable. Ground disturbance can continue only after the resources has been properly mitigated and with approval by the City.	
Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?	Potentially significant impact	**MM-CUL-2.** In order to mitigate impacts to human remains to a level that is less than significant, procedures for proper treatment of unanticipated discoveries must comply with the California Environmental Quality Act (CEQA) Guidelines. In the event of discovery of unanticipated human remains, personnel shall comply with Public Resources Code Section 5097.98, CEQA Section 15064.5, and Health and Safety Code Section 7050.5 during earth-disturbing activities: 1. If any human remains are discovered, the construction personnel or the appropriate representative shall contact the County Coroner and the City. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted by the property owner or their representative in order to determine proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the Most Likely Descendant regarding their recommendations as required by California Public Resources Code Section 5097.98 has been conducted. California Public Resources Code Section 5097.98, CEQA Section 15064.5 and Health & Safety Code Section 7050.5 shall be followed.	Less-than-significant impact with mitigation incorporated
Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or	Less-than-significant	N/A	Less-than-significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?			
Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to	Potentially significant impact	**MM-CUL-1**	Less-than-significant impact with mitigation incorporated

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
a California Native American tribe.			
Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially significant impact	**MM-CUL-3. Inadvertent Discovery.** Prior to ground-disturbing activities, the qualified paleontologist shall be retained and prepare a WEAT (worker environmental awareness training). The paleontologist, or their designee, shall present the WEAT for the construction crew members informing them of the potential to inadvertently encounter paleontological resources and the proper procedures to be enacted in the event of an inadvertent discovery. The WEAT may be done during a pre-construction meeting or morning tailboard safety meeting as long as it is done prior to ground disturbance. 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. The applicant shall ensure that construction personnel attend the training and sign an attendance acknowledgement form. The applicant shall retain documentation demonstrating attendance. The qualified paleontologist shall observe all initial ground disturbing activities including grading and excavation. In the unlikely event that paleontological resources (i.e., fossils) are exposed during construction activities, all construction work occurring within 50 feet of the find shall immediately stop and the lead agency representative contacted. The qualified paleontologist shall review the unanticipated find to determine the significance. If the discovery proves potentially significant under CEQA as determined by the qualified paleontologist, and the area cannot be feasibly avoided, paleontological monitoring may be warranted at the discretion of the qualified paleontologist.	Less-than-significant impact with mitigation incorporated
Would the Project have a cumulative effect on cultural resources?	Potentially significant impact	MM-HIS-1 MM-HIS-2 MM-HIS-3 MM-HIS-4 MM-CUL-1 MM-CUL-2 MM-CUL-3	Significant and unavoidable impact

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
Energy			
Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	Less-than-significant	N/A	Less-than-significant
Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less-than-significant	N/A	Less-than-significant
Greenhouse Gas Emissions			
Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less-than-significant	N/A	Less-than-significant
Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less-than-significant	N/A	Less-than-significant
Hazards and Hazardous Materials			
Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less-than-significant	N/A	Less-than-significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
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?	Less-than-significant	N/A	Less-than-significant
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?	Less-than-significant	N/A	Less-than-significant
Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	Less-than-significant	N/A	Less-than-significant
Would the Project be located within an airport land use plan, be within two miles of a public airport, and result in a safety hazard or excessive noise for people residing or working in the Project area?	Less-than-significant	N/A	Less-than-significant
Would the Project impair implementation of or physically interfere with an adopted	Less-than-significant	N/A	Less-than-significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
emergency response plan or emergency evacuation plan?			
Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Less-than-significant	N/A	Less-than-significant
Hydrology and Water Quality			
Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less-than-significant	N/A	Less-than-significant
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?	Less-than-significant	N/A	Less-than-significant
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	Less-than-significant	N/A	Less-than-significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
runoff in a manner which would result in flooding on or off site; 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?			
Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less-than-significant	N/A	Less-than-significant
Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No Impact	N/A	No Impact
Land Use and Planning			
Would the Project divide an established community?	Less-than-significant	N/A	Less-than-significant
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?	No Impact	N/A	No Impact

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
Noise			
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?	Less-than-significant	N/A	Less-than-significant
Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?	Less-than-significant	N/A	Less-than-significant
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.	Less-than-significant	N/A	Less-than-significant
Public Services			
Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or	Less-than-significant	N/A	Less-than-significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: i. Fire protection? ii. Police protection? iii. Schools? iv. Parks? v. Other public facilities?			
Transportation			
Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Potentially significant impact	**MM-TRA-1. Trip Reduction Program.** Prior to the issuance of first Certificate of Occupancy, the Project tenant will prepare a Trip Reduction program. The program shall include the following components: 1. **Implement Commute Trip Reduction Marketing**: a. Set-up a Transportation Kiosk, either physically on-site or online, with transportation information that employees could access at work or on their smart phones or personal computers. If an online kiosk, information can be available on the company's website (or intranet, or internal website). The Project developer or property manager will have responsibility for setting up and maintaining the information center. The Transportation Kiosk will have site-specific information about all the measures, services, and facilities discussed in this Program. In addition, the information center will include: b. A summary of local bus routes and local bicycle facilities to provide further information about their routes and schedules and the incentive programs available to transit users. c. Information about ride matching services (SANDAG - Bike Services) and on-site ride matching) and the incentive programs available to carpools.	Significant and unavoidable impact

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		d. Information about services such as Uber, Lyft, and other on-demand transportation services. e. A local bikeways map and bicycling resources f. Availability of bicycle parking such as lockers and amenities including bike pumps, repair stations, full coverage lighting and security cameras. g. Information about bicycle education classes taught by certified league instructors from the San Diego County Bicycle Coalition. 2. **Provide Ridesharing Program:** The Project tenant will promote ride-sharing programs through a multi-faceted approach, such as designating a certain percentage of parking spaces for ride-sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles, and/or providing a website or message board for coordinating rides. A designated employee may partner with SANDAG to use programs such as SANDAG Vanpool, Employer Commuter Program and Guaranteed Ride Home. 3. **Implement Subsidized or Discounted Transit Program:** The Project tenant would provide or reimburse the cost of monthly transit passes (such as Pronto card or mobile app) to the employees who use bus or rail transit to work to create incentive programs that reward employees for utilizing non-single occupancy vehicles to commute. 4. **Provide End of Trip Bicycle Facilities:** The Project will provide at least 15 bicycle parking spaces per City's parking code requirement. Where possible, appropriate designed electrical outlets will be included near the bicycle racks for charging electric bicycles (E-bikes). **MM-TRA-2. Construction of Sidewalk.** The Project will construct a new sidewalk along a portion of N. Woodside Avenue to create a continuous sidewalk along N. Woodside Ave. where it intersects the SR-67. Together, with the sidewalk constructed per PDF-TRA-1, this will be a total of 990 linear feet of new sidewalk. If the applicant, despite commercially reasonable efforts, is unable to obtain the necessary permits to construct the portion of sidewalk located outside of the City	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
		of Santee's right-of-way, the applicant will have an additional six months following the issuance of the Certificate of Occupancy to complete that portion. If, at the end of that six-month period, the applicant is still unable to construct the sidewalk due to the continued inability to obtain the required permits, the applicant will pay an in-lieu fee in the amount of $50,000 to the City to complete this work.	
Would the Project have a cumulative effect with regard to transportation?	Potentially significant impact	MM-TRA-1 MM-TRA-2	Significant and unavoidable impact
Utilities			
Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less-than-significant	N/A	Less-than-significant
Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less-than-significant	N/A	Less-than-significant
Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate	Less-than-significant	N/A	Less-than-significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
capacity to serve the Project's projected demand in addition to the provider's existing commitments?			
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?	Less-than-significant	N/A	Less-than-significant
Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less-than-significant	N/A	Less-than-significant
Wildfire			
Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less-than-significant	N/A	Less-than-significant
Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less-than-significant	N/A	Less-than-significant
Would the Project require the installation or maintenance of associated infrastructure (such	Less-than-significant	N/A	Less-than-significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measures	Level of Significance After Mitigation
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?			
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?	Less-than-significant	N/A	Less-than-significant

Significant and Unavoidable Impacts

As identified in Table 1-1, the Project would result in significant and unavoidable impacts with regard to historical resources and transportation. These impacts are discussed in further detail below.

- **Cultural, Tribal Cultural, and Paleontological Resources.** The Former Drive-In Theatre on the Property is conservatively determined to be eligible for listing in the National Register of Historic Places and the California Register of Historical Resources and is conservatively assumed to be a historical resource under CEQA (CEQA Guidelines §15064.5(a)(3).) A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1).) Based on the foregoing conservative assumptions, the demolition of the Former Drive-In Theatre would result in a substantial adverse change in the significance of an historic resource under CEQA. Because the Project's impact would not be reduced below significance threshold, even with implementation of MM-HIS-1, MM-HIS-2, MM-HIS-3, and MM-HIS-4, the Project's historic resource impact would remain significant and unavoidable.
- **Transportation.** The Project would generate VMT in excess of the significance threshold even with the implementation of mitigation. A VMT reduction of 11.3% would be achieved through the implementation of Commute Trip Reduction (CTR) measures. A reduction of 15% is required to reduce the VMT per employee to at or below regional level. As shown in Section 4.12.5, MM-TRA-1 Trip Reduction Program would be implemented by the Project's tenants to reduce the Project's VMT and MM-TRA-2 Construction of Sidewalk would improve pedestrian network connectivity in the area. Because the Project's VMT would not be reduced to below significance threshold even with the implementation of MM-TRA-1 and MM-TRA-2, the Project's VMT impact would remain significant and unavoidable.

1.8 Alternatives to the Project

Section 15126.6(a) of the CEQA Guidelines states that an EIR shall describe "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project," as well as provide an evaluation of "the comparative merits of the alternatives." Under CEQA Guidelines Section 15126.6(a), an EIR does not need to consider alternatives that are not feasible, nor does it need to address every conceivable alternative to the project. The range of alternatives "is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice" (14 CCR 15126.6[f]).

No Project/No Development Alternative (Alternative 1)

Under Alternative 1, construction of the Project would not occur, and the existing environment would remain in its current state. The Project site would remain unchanged, and development activities related to construction and operation of the proposed industrial/warehouse building, associated office spaces, surface parking and loading areas, and all other proposed on- and off-site improvements would not occur.

In the short term, consistent with the existing conditions, the Project site would continue to be underutilized. Under Alternative 1, the Project site would remain with a non-operating drive-in theatre that includes two movie screens, two ticket booths, and a building containing restrooms and a snack bar, which could be used as a swap meet on weekends. The site would presumably continue to be utilized for a swap meet on the weekends, and subject to vegetation

occurring similar to the existing conditions. It is assumed any existing maintenance and/or security activity at the site would remain unchanged from existing conditions.

Reduced Development Intensity Alternative (Alternative 2)

Under Alternative 2, the Project site would be redeveloped with a smaller warehouse building with the remainder of the Project site utilized for outdoor storage. Per Table 13.14.030A of the Santee Municipal Code, outdoor storage is allowable as an accessory use to a permitted use within the IL zone with the approval of a minor conditional use permit. Accessory outdoor storage uses must comply with Section 13.14.030(G)(2)) of the Santee Municipal Code which sets forth several requirements for screening, heights of stored material, locations of the stored material within the site, and access requirements. In addition, depending on the type of material to be stored, the installation of a canopy or outdoor roof structure may be required to shield the material from the elements to allow for the proper functioning of stormwater systems.

Under Alternative 2, the Project site would be redeveloped with an approximately 120,000 square feet (sf) warehouse-type building (an approximately 60% reduction in building size compared to the Project), an approximately 150,000 sf area dedicated to outdoor storage use, and reduced parking to accommodate the reduced development intensity. This alternative assumes compliance with Santee Zoning Code Section 13.14.030(G)(2) regarding outdoor storage. The reduced development footprint for Alternative 2 would be setback further south of the northern Project boundary and existing trees and a movie screen along the northern boundary of the Property would be retained in-place.

Refrigerated Warehouse Alternative (Alternative 3)

Under Alternative 3, the Project site would be redeveloped with a smaller warehouse-type building of approximately 200,000 sf and up to 40 feet in height. It is assumed that the warehouse would include 100,000 square feet for cold storage space, 95,000 square feet for general warehousing uses, and 5,000 square feet for office use. Compared to the proposed Project, the project footprint for Alternative 3 would be smaller and setback further south of the northern Project boundary. It is assumed that existing trees and movie screen along the northern boundary of the Property would be retained in-place. Per Table 13.14.030(A) of the Santee Municipal Code, cold storage would fall under the "Fruit or vegetable products manufacturing, including frozen foods" use and would be permitted within the IL zone with the approval of a conditional use permit. The reduced development would require fewer employees. Proposed parking at the site would require fewer parking stalls compared to the proposed Project and would be utilized for the staging and storage of refrigerated trailers, which would be connected to exterior electrical receptacles to keep their contents cold or temporarily operated under their own power via diesel generators. This alternative assumes compliance with all zoning and development regulations for the IL zoning.

Environmentally Superior Alternative

Section 15126(e)(2) of the State CEQA Guidelines requires an EIR to identify an "environmentally superior alternative." If the No Project/No Development Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other Project alternatives.

Alternative 1 (No Project/No Development Alternative) would be the environmentally superior alternative because all of the significant impacts of the Project would be avoided, and no environmental impacts would occur. However, Alternative 1 would not meet any of the Project's Objectives. Alternative 2 (Reduced Development Intensity Alternative) would result in the same potentially significant and unavoidable impacts as the Project, though impacts to biological resources and historic resources would be of a lesser magnitude compared to the Project. Thus,

Alternative 2 would be identified as another Environmentally Superior Alternative to the Project. Compared to the Project, Alternative 3 (Refrigerated Warehouse Alternative) would result in similar impacts to hydrology and water quality, land use and planning, transportation, and utilities and service systems, and would result in greater impacts to air quality, energy, and greenhouse gas emissions. Alternative 2 and Alternative 3 would meet most of the project objectives, though not to the same extent as the Project, and would fall short of meeting Objective 2. Because Alternative 2 would result in reduced environmental impact to most resources compared to the Project and Alternative 3, Alternative 2 would be considered environmentally superior. This alternative could also meet most of the project's objectives. It should be noted that Alternative 2 would not avoid significant unavoidable impacts of the Project.

1.9 Areas of Controversy/Issues to Be Resolved

The scope of this EIR includes the potential environmental impacts identified in the Notice of Preparation (NOP) that was available for public review from September 8, 2023, through October 9, 2023; comments received during a public scoping meeting held on September 26, 2023 at City Hall in Santee; and agency and public written comment received in response to the NOP.

A summary of these written comment letters are provided in Table 1-2. The written comments and the NOP are included as Appendix A of this EIR.

Table 1-2. Summary of Notice of Preparation Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/Section Where Comment is Addressed
State Agency			
Native American Heritage Commission (NAHC)	09/09/2023	▪ Standard NAHC letter; recommendations, consultation information, and legal information	Cultural and Tribal Cultural Resources
California Department of Transportation (Caltrans)	09/18/2023	▪ Standard Caltrans letter; recommends traffic impact study, hydrology and drainage studies, complete streets and mobility network, land use and smart growth, hauling/traffic control plan, noise, glare, environmental, broadband, mitigation, and right-of-way analyses.	Transportation
Private Organizations and Members of the Public			
Lozeau Drury LLP; Supporters Alliance for Environmental Responsibility ("SAFER")	09/27/2023	▪ Requests notices of CEQA documentation and actions	n/a

Table 1-2. Summary of Notice of Preparation Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/Section Where Comment is Addressed
Comments Received at the Scoping Meeting			
Stacey LoMedico	09/26/2023	▪ Concerns about buffers near the San Diego River Conservancy Reserve and the nearby river.	Biological Resources
		▪ Questions about nesting birds at the Project site.	Biological Resources
		▪ Visual screening around the building, facing the river.	Aesthetics

Issues to be Resolved by Lead Agency

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain a discussion of issues to be resolved. With respect to the proposed project, the key issues to be resolved include decisions by the City, as lead agency, as to the following:

- Whether this environmental document adequately describes the environmental impacts of the Project.
- Whether the recommended mitigation measures should be modified and/or adopted.
- Whether there are other mitigation measures or alternatives that should be considered for the Project besides those identified in the Draft EIR.

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2 Introduction

2.1 Purpose of the California Environmental Quality Act Process

This Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental effects associated with implementation of the Palisade Santee Commerce Center Project (Project). Consistent with CEQA Guidelines Section 15161, this document is a project-level EIR. As the lead agency for the Project, the City must complete an environmental review to determine if the Project could potentially result in significant adverse environmental effects. A detailed description of the Project is provided in Chapter 3, Project Description.

CEQA Guidelines Section 15002 states that the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced; and
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.

If a project will be approved involving significant environmental effects, the lead agency must also disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose.

This EIR provides project-level analysis of the potential environmental effects related to implementation of the Project. The level of impact analysis in this EIR corresponds to the degree of specificity deemed appropriate in accordance with CEQA Guidelines Section 15146. This EIR addresses the potentially significant environmental impacts that could occur as a result of construction and operation of the Project. This document also identifies appropriate and feasible mitigation measures, where necessary, and includes Project alternatives that could be adopted to reduce or avoid potential significant environmental effects.

2.2 Legal Authority and Lead Agency

This EIR has been prepared in accordance with all criteria, standards, and procedures of CEQA (PRC Section 21000 et seq.), the CEQA Guidelines (14 CCR 15000 et seq.), and the rules, regulations, and procedures for implementing CEQA as adopted by the City of Santee (City).

Pursuant to CEQA Section 21067 and CEQA Guidelines Article 4 and Section 15367, the City is the lead agency under whose authority this EIR has been prepared. “Lead agency” refers to the public agency that has the principal responsibility for carrying out or approving a project. Serving as the lead agency and before taking action to approve the Project, the City has the obligation to (1) ensure that this EIR was completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision-making process; (3) make a statement that this EIR reflects the City’s independent judgment; (4) ensure that all significant impacts on the environment are eliminated or substantially lessened, where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or Project alternatives

identified in this EIR are infeasible and citing the specific benefits of the Project that outweigh its unavoidable adverse effects (14 CCR 15090–15093).

Pursuant to CEQA Guidelines Sections 15040 through 15043, and upon completion of the CEQA review process, the City will have the legal authority to do any of the following:

- Approve the Project;
- Require feasible changes in any or all activities involved in the Project to substantially lessen or avoid significant effects on the environment;
- Disapprove the Project, if necessary, to avoid one or more significant effects on the environment that would occur if the Project was approved as proposed; or
- Approve the Project even though the Project would cause a significant effect on the environment if the City makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen the effect or avoid the significant effect, and (2) expected benefits from the Project will outweigh significant environmental impacts of the Project.

This EIR fulfills the CEQA environmental review requirements for the proposed Conditional Use Permit (CUP-2023-0001), Development Review Permit (DR-2023-0002), and all other governmental discretionary and ministerial actions related to the Project.

This EIR is an informational document intended for use by City decision makers, trustee, and responsible agencies, and members of the general public in evaluating the physical environmental impacts of the Project. This EIR is the primary reference document for the formulation and implementation of a mitigation monitoring and reporting program for the Project, in compliance with Public Resources Code (PRC) Section 21081.6. Environmental impacts cannot always be mitigated to a level considered less than significant. In accordance with Section 15093(b) of the CEQA Guidelines, if a lead agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts), the agency shall state in writing the specific reasons for approving the Project, based on the final CEQA documents and any other information in the public record. This is defined in Section 15093 of the CEQA Guidelines as "a statement of overriding considerations."

2.3 Responsible and Trustee Agencies

Responsible and Trustee Agencies

PRC Section 21104 requires that all EIRs be reviewed by state responsible and trustee agencies (see also 14 CCR 15082 and 15086[a]). As defined by CEQA Guidelines Section 15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." A trustee agency is defined in CEQA Guidelines Section 15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California."

For this Project, the California Department of Fish and Wildlife is a trustee agency, because the Project has the potential to result in indirect impacts to plant and wildlife species that are managed and protected by the state.

Other Agencies from Whom Ministerial Approvals May Be Required

As part of the Project, improvements at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection are proposed and would be subject to approval by the City and Caltrans.

2.4 Summary of Project Analyzed in this Environmental Impact Report

The proposed Project includes the demolition of all existing on-site structures and the construction of a 300,145 square foot industrial/warehousing building. The Project would include 290,145 square feet of warehouse space and 10,000 square feet of office space. In addition to the industrial building, the Project would include up to 42 dock-high doors, four grade-level doors, two truck courts, up to 301 passenger-vehicle parking spaces, 30- and 40-foot-wide fire access lanes along the building perimeter, landscaping, and fencing along portions of the developed perimeter with automated gates at certain driveway locations. The Project would also include associated utility, stormwater treatment, and roadway improvements. Permits and approvals required for Project implementation are listed in Chapter 3, Project Description, and described in Chapter 4, Environmental Analysis, of this Draft EIR.

2.5 Scope of Environmental Analysis

2.5.1 Notice of Preparation Scoping Process

The purpose of this EIR is to evaluate the potential environmental impacts associated with implementation of the Project. The City concluded that the Project could potentially have direct or indirect adverse effects on the environment. Accordingly, the City determined the need for preparation of an EIR for the Project. Potentially significant impacts were identified based on review of comments received in response to the Notice of Preparation (NOP) that was available for public review from September 8, 2023, through October 9, 2023 (see Appendix A) and additional research and analysis of relevant project data during preparation of this Draft EIR. A scoping meeting for this Project was held on September 26, 2023, at the Santee City Hall Council Chambers.

A summary of written comment letters received is provided in Table 2-1. No written comments were received at the scoping meeting.

Table 2-1. Summary of Notice of Preparation Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/Section Where Comment is Addressed
Private Organizations and Members of the Public			
Stacey LoMedico	September 26, 2023	▪ Location of loading docks and parking ▪ Questions regarding hours of operation ▪ CUP due to increased height ▪ Visual screening on the north side of the Project site ▪ Buffers of the development area and the river ▪ Are there any known bird nesting sites? ▪ Preparation of noise studies ▪ Will the Santee Noise Ordinance change? ▪ Will construction be allowed on weekends?	Chapter 3, Project Description Section 4.1, Aesthetics Section 4.3, Biological Resources Section 4.10, Noise Chapter 7, Alternatives

Table 2-1. Summary of Notice of Preparation Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/Section Where Comment is Addressed
		▪ Provided three videos from north of the San Diego River demonstrating existing noise levels from a neighboring use ▪ How many project alternatives will be studies?	
Lozeau Drury	September 27, 2023	▪ Request for any and all information referring to or related to the project	N/A

2.5.2 Environmental Effects Found Not to Be Significant

Pursuant to CEQA, the discussion of potential environmental impacts is focused on those impacts that could be significant or potentially significant. CEQA allows the lead agency to limit the detail of discussion of the environmental impacts that are not considered potentially significant (PRC Section 21100; 14 CCR 15126.2[a] and 15128). CEQA requires that the discussion of any significant environmental effect be limited to substantial, or potentially substantial, adverse changes in physical conditions that exist within the affected area, as defined in PRC Section 21060.5. In accordance with CEQA Guidelines Section 15143, environmental impacts dismissed in an analysis as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless the lead agency subsequently receives information inconsistent with the finding.

Based on a review of comments received in response to the NOP (Appendix A) as well as additional research and analysis of relevant project data during preparation of this Draft EIR, it was determined, for reasons described in Chapter 5, Effects Found Not to Be Significant, of this EIR, that the project would not result in significant environmental impacts in the following resource areas. Thus, with the exception of the impact discussion in Chapter 5 of this EIR, these environmental resource areas are not discussed at further length in this EIR:

- Agricultural and Forestry Resources
- Geology and Soils
- Mineral Resources
- Population and Housing
- Recreation

2.5.3 Environmental Issues Determined to be Potentially Significant

Pursuant to CEQA and CEQA Guidelines Section 15064, the discussion of potentially significant environmental impacts is focused in this EIR on those impacts that the lead agency has determined could be potentially significant. A determination of the environmental impacts that would be potentially significant was made for the Project based on a review of comments received as part of the NOP scoping process and additional research and analysis of relevant information during preparation of this EIR. The following environmental issue areas were determined to be potentially significant and are addressed at further length in this EIR:

- Aesthetics
- Air Quality
- Biological Resources

- Cultural, Tribal Cultural, and Paleontological Resources
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Utilities and Service Systems
- Wildfire

2.6 Organization of this Environmental Impact Report

This EIR contains all of the information required to be included in an EIR, as specified by the CEQA Statutes and Guidelines (PRC Section 21000 et seq.; 14 CCR 15000 et seq.). CEQA requires that an EIR contain, at a minimum, specified content. The following provides a quick reference in locating the CEQA-required sections within this document:

- **Chapter 1: Executive Summary.** The Executive Summary provides a summary of the Project and Project alternatives, including a summary of the Project and cumulative impacts, recommended mitigation measures, and the level of significance after mitigation for each environmental issue.
- **Chapter 2: Introduction.** The Introduction provides an overview of the Project and the CEQA process, and describes the purpose, scope, and components of this EIR.
- **Chapter 3: Project Description.** The Project Description provides a detailed description of the Project, including the location and Project characteristics. The intended uses of this EIR, Project background, Project objectives, and required Project approvals are also addressed.
- **Chapter 4: Environmental Impacts and Mitigation Measures.** The Environmental Impacts and Mitigation Measures chapter analyzes the environmental impacts of the Project. Impacts are organized into major environmental topic areas. Each topic area includes a description of the environmental setting, regulatory setting, significance criteria, mitigation measures, and level of significance after mitigation. The following specific environmental areas are addressed in Chapter 4:
  - Section 4.1 – Aesthetics
  - Section 4.2 – Air Quality
  - Section 4.3 – Biological Resources
  - Section 4.4 – Cultural, Tribal Cultural, and Paleontological Resources
  - Section 4.5 – Energy
  - Section 4.6 – Greenhouse Gas Emissions
  - Section 4.7 – Hazards and Hazardous Materials
  - Section 4.8 – Hydrology and Water Quality
  - Section 4.9 – Land Use and Planning
  - Section 4.10 – Noise
  - Section 4.11 – Public Services and Recreation
  - Section 4.12 – Transportation
  - Section 4.13 – Utilities and Service Systems
  - Section 4.14 – Wildfire
- **Chapter 5: Effects Found Not to Be Significant.** The Effects Found Not to Be Significant chapter provides a summary of Project impacts that have been determined, based on review of comments received in response to the NOP and additional research and analysis of relevant project data during preparation of

this Draft EIR, to result in less-than-significant or no impact, and therefore, further discussion is not warranted. A brief discussion of these Project impacts are provided in this chapter.

- **Chapter 6: Other CEQA Considerations.** The Other CEQA Considerations chapter provides a discussion of cumulative impacts and a summary of significant environmental impacts, including unavoidable, irreversible, and growth-inducing impacts.
- **Chapter 7: Alternatives.** The Alternatives chapter provides a comparison between the Project impacts and three Project alternatives: (1) the No Project/No Development Alternative, (2) Reduced Development Intensity Alternative, and (3) the Refrigerated Warehouse Alternative.
- **Chapter 8: List of Preparers.** The List of Preparers chapter provides a list of the organizations, persons consulted, and various individuals who contributed to the preparation of this EIR. This section also includes a list of the lead agency personnel and technical consultants used to prepare this EIR.
- **Appendices.** The technical appendices contain the NOP (including public comments) and technical studies prepared to support the analyses and conclusions in this EIR.

The Final EIR will be prepared after the public review period for this EIR has been completed. The Final EIR will include comments and recommendations received on the EIR during the public review period; a list of persons, organizations, and public agencies commenting on the EIR; written responses to significant environmental issues identified in the comments received; and any other relevant information added by the City.

2.7 Documents Incorporated by Reference

Pursuant to CEQA Guidelines Section 15150, this EIR has referenced several technical studies, analyses, and previously certified environmental documents. Information from these documents, incorporated by reference, is briefly summarized in the appropriate chapters and sections. The documents that were used to prepare this EIR include the following:

- City of Santee General Plan Update (2007)
- Santee Municipal Code (Code of Ordinances) (2023 [Updated])
- County of San Diego Countywide Plan (General Plan) (2011)

These reference documents, in accordance with CEQA Guidelines Section 15150(b), are available for review at the following locations:

City of Santee General Plan

https://www.cityofsanteeca.gov/services/development-services/planning-and-zoning-services/general-plan

City of Santee Code of Ordinances

https://library.qcode.us/lib/santee_ca/pub/municipal_code

County of San Diego Countywide Plan (General Plan)

https://www.sandiegocounty.gov/pds/generalplan.html

2.8 Documents Prepared for the Project

The following technical studies and analyses were prepared for the Project and Project site and are incorporated into the technical appendices of this EIR:

- Initial Study, Notice of Preparation, and Scoping Comments, Appendix A
- Air Quality and Greenhouse Gas Emission Technical Report, Appendix B
- Biological Technical Report, Appendix C
- Arborist Report, Appendix D
- Archaeological Resources Inventory Report, Appendix E
- Historical Assessment, Appendix F
- Geotechnical Engineering Investigation, Appendix G
- Paleontological Resources Memorandum, Appendix H
- Phase I Environmental Site Assessment, Appendix I
- Preliminary Hydrology Study, Appendix J-1
- Storm Water Quality Management Plan, Appendix J-2
- Letter to City of Santee regarding the 100-Year Floodplain, Appendix J-3
- Noise Technical Report, Appendix K
- Transportation Impact Study, Appendix L
- Water Study, Appendix M
- Fire Protection Plan, Appendix N
- AB 52 Letters and Receipts, Appendix O

2.9 Review of the Draft Environmental Impact Report

Upon completion of this Draft EIR, the City prepared and filed a Notice of Completion with the Governor's Office of Planning and Research, State Clearinghouse to start the public review period (PRC Section 21161). Concurrent with the Notice of Completion, the City distributed a Notice of Availability in accordance with CEQA Guidelines Section 15087. The Notice of Availability was mailed to the agencies, organizations, and individuals who previously requested in writing to receive a copy. This Draft EIR was distributed to responsible and trustee agencies, other affected agencies, surrounding cities and municipalities, and all interested parties requesting a copy of this document in accordance with PRC Section 21092(b)(3). During the public review period, this Draft EIR, including the appendices, is available for review at the following locations:

In Person:

City of Santee Planning & Building Department (Building 4)
City of Santee Clerk's Office (Building 3)
10601 Magnolia Avenue
Santee, California 92071

Santee County Library
9225 Carlton Hills Boulevard, Santee, CA 92071

Online:

https://www.cityofsanteeca.gov/business/active-projects-map

Agencies, organizations, individuals, and all other interested parties not previously contacted, or who did not respond to the NOP, currently have the opportunity to comment on this Draft EIR during the public review period. Written or email comments on this Draft EIR should be addressed to:

Sandi Sawa, Director of Planning and Building
City of Santee, Planning and Building Department
10601 Magnolia Avenue
Santee, California 92071
Phone: 619.258.4100 ext. 167
Email: ssawa@cityofsanteeca.gov

Upon completion of the public review period, written responses to all substantive environmental comments are prepared and made available prior to the public hearing on the Project before the City of Santee City Council, at which the Project, the Final EIR, and requested entitlements are considered for approval. The comments received and the responses to those comments will be included as part of the record for consideration for the Project.

3 Project Description

This chapter describes the objectives of the Palisade Santee Commerce Center Project (Project) and the Environmental Impact Report (EIR) and provides a detailed description of the Project characteristics. This chapter also discusses the required development approvals and discretionary actions necessary to implement the Project.

3.1 Project Location

The approximately 13.5-acre Project site is located in the southeastern part of the City of Santee (City), which is located within the East County region of San Diego County, as shown on Figure 3-1, Regional Map and Figure 3-2, Project Location. The Project site is located at 10990 N. Woodside Avenue and is bounded by the San Diego River to the north; industrial buildings to the east and west; and by industrial buildings, Wheatlands Avenue, and California State Route (SR) 67 to the south. The Project site is located in Section 23 of Township 15 South, Range 1 West, as depicted on the U.S. Geological Survey El Cajon, California 7.5-minute topographic quadrangle map. Regional access to the proposed Project is provided via SR-67 located approximately 0.1 miles south of the Project site. Local access to the Project is provided via N. Woodside Avenue.

3.2 Environmental Setting

City of Santee

The City is located in the East County region of San Diego County, between the Pacific Ocean and the Cleveland National Forest. Encompassing about 17 square miles (approximately 10,615 acres) in eastern San Diego County, the City is located approximately 18 miles east of downtown San Diego. The City is bordered on the east by primarily residential development in the unincorporated San Diego County communities of Lakeside and Eucalyptus Hills and to the northeast by vacant land and active mining operations in Slaughterhouse Canyon. To the south, Santee is bordered by the City of El Cajon, unincorporated areas of County of San Diego, and the Gillespie Field Airport, and further to the southwest by Mission Trails Regional Park property located in the City of San Diego (City of Santee 2003).

The City comprises a mix of different land use types and density. Single-family residential uses comprise the largest land use totaling approximately 2,418 acres. The other residential use types occurring throughout the City include multifamily residential (apartments and condominiums), and mobile home parks. These residential uses are primarily located near the City's highly traveled roads including Mission Gorge Road, Magnolia Avenue and Prospect Avenue. Located approximately one mile to the west of the Project, the planned 650-acre Town Center district is anticipated to be a vibrant neighborhood in the heart of Santee with new housing, dining, and indoor and outdoor amenities. The Metropolitan Transit System trolley station provides regional public transportation (City of Santee 2023). Industrial uses in the City are concentrated in the south-central region along Prospect Avenue, Magnolia Avenue and Cuyamaca Street, and north of Woodside Avenue along the San Diego River corridor, within the vicinity of the Project site (City of Santee 2003).

Existing Project Site

As shown on Figure 3-3, Project Aerial and Existing Uses, the approximately 13.5-acre Project site is developed with a drive-in theatre that includes two movie screens, two ticket booths, and a building containing restrooms and a

snack bar. The Project site boundary extends beyond the paved drive-in into the undeveloped area south of the San Diego River. The drive-in theatre has closed, but the site continues to be used for a swap meet.

Consistent with the property boundary, the Project site extends beyond the paved drive-in parking area. Beyond the paved parking area, the site includes certain vacant areas bordering the San Diego River. There are no native vegetation communities within the Project boundary. Vegetation land coverages include Developed and Ornamental. There are no aquatic resources within the Project site boundary. The northern edge of the Project site boundary is next to stands of thick vegetation occurring along a chain link fence line. This vegetation was dominated by African sumac (*Searsia lancea*), a non-native low-growing tree species which is known to occupy disturbed areas.

Photos of the Project site are provided in Figure 3-4, Existing Conditions.

The Assessor's Parcel Number (APN) of the Project site is 381-070-52. The City's General Plan and the Zoning Map designates the entire Project site as Light Industrial (IL), as shown on Figure 3-5, General Plan Land Use, and Figure 3-6, Zoning (City of Santee 2017, 2020).

Surrounding Land Uses

As shown on Figure 3-3, Project Aerial and Existing Uses, the land uses surrounding the Project site consist of a mix of industrial, manufacturing, automotive, commercial, open space, and residential uses. Specific land uses located in the immediate vicinity of the Project site include the following:

- **North:** San Diego River, with residential uses beyond
- **East:** Industrial and manufacturing uses, and Mission Park Court
- **South:** Manufacturing and commercial uses, North Woodside Avenue, and SR-67
- **West:** Industrial and manufacturing uses, and Wheatlands Court

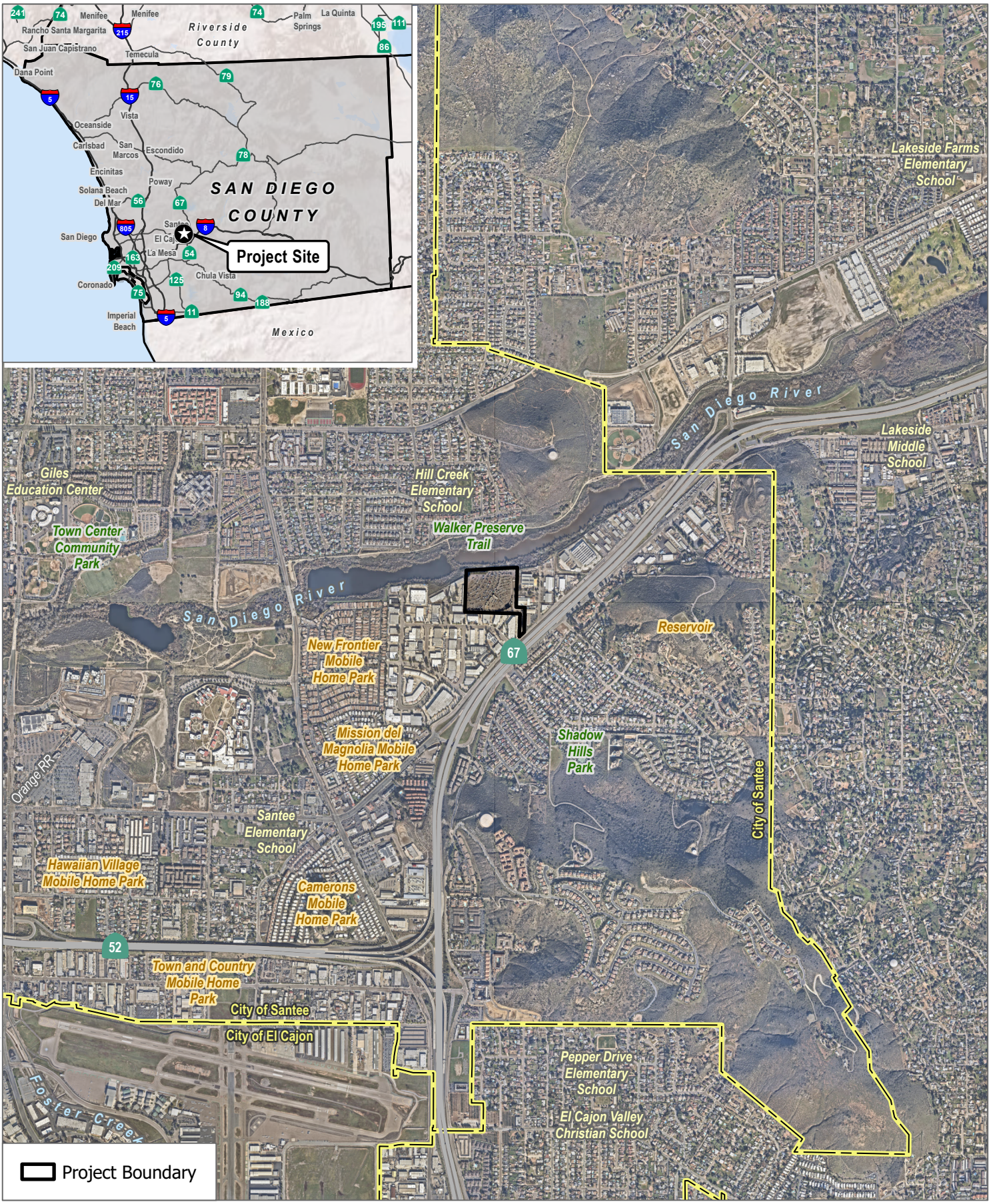
Surrounding Circulation Network

Roadways

Regional access to the Project would be provided by SR-52 and SR-67. Local access to the Project would be provided by Riverford Road (in the community of Lakeside), Magnolia Avenue, and Mission Gorge Road-Woodside Avenue. Both Magnolia Avenue and Mission Gorge Road-Woodside Avenue are designated truck routes within the City of Santee.

Riverford Road

Riverford Road is a north-south roadway, located in the City of Lakeside, that crosses the Santee River. Riverford Road begins north of its intersection with El Nopal Road and ends at its connection with Woodside Avenue, immediately south of SR-67. Riverford Road provides connections to Riverside Drive, N. Woodside Avenue, and Woodside Avenue. The segment of Riverford Road from Riverside Drive to Woodside Avenue is classified as a Prime Arterial and a Major Roadway. The majority of Riverford Road has Class II bike lanes and paved sidewalks on both sides of the road. The bike lanes and paved sidewalks end at the northern and southern portions of the roadway (where Riverford Road intersects with El Nopal Street and at the SR-67 underpass crossing). On-street parking is not permitted along Riverford Road and the posted speed limit is 40 miles per hour (MPH).



SOURCE: SanGIS, Open Street Maps

FIGURE 3-1

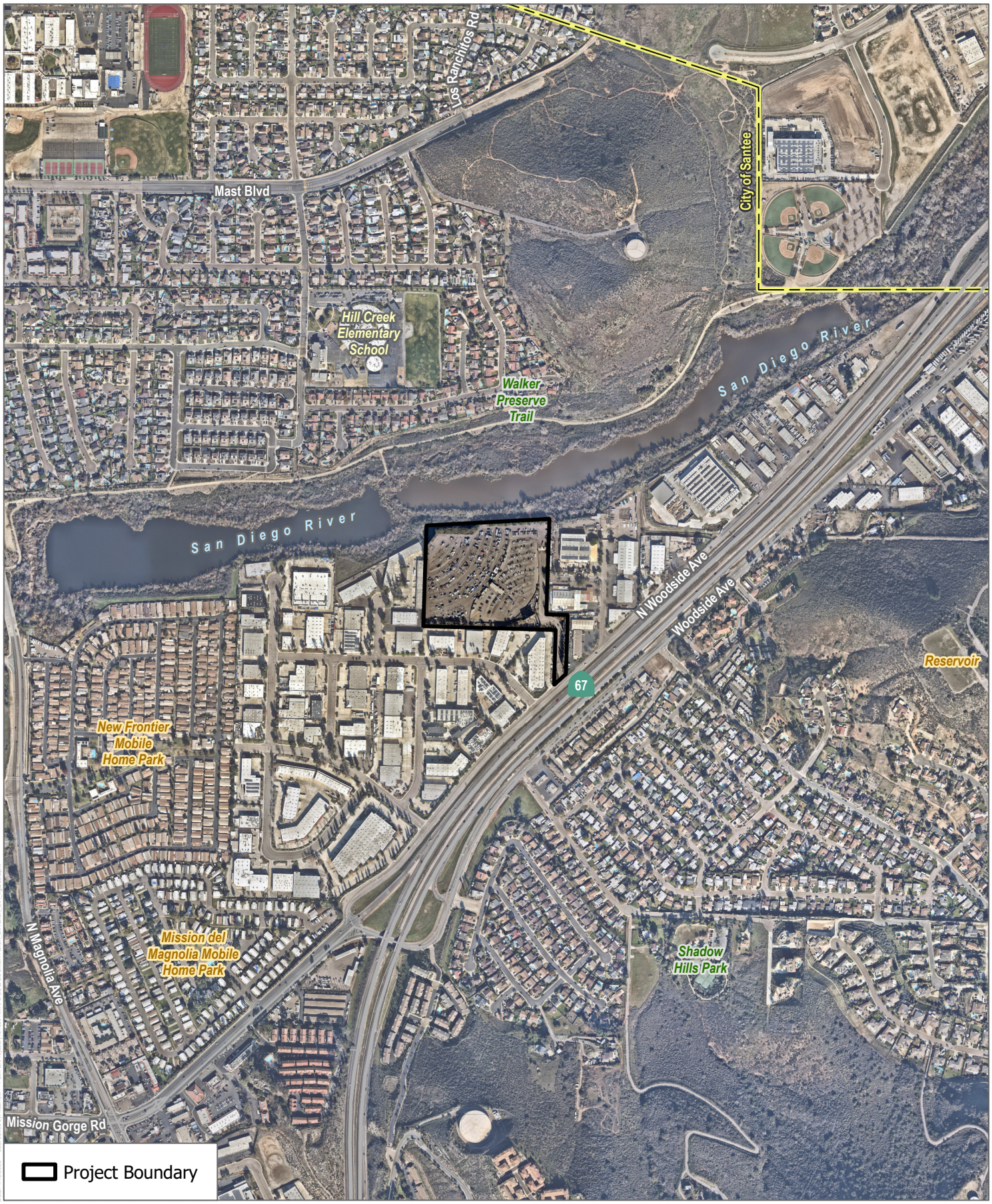
Regional Map

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps

DUDEK

0 250 500 Feet

FIGURE 3-2

Project Location

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps

FIGURE 3-3

Project Aerial and Existing Uses

Palisades Santee Commerce Center Project

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Photo A: View looking towards the northwest corner of the Project site, from the northeast corner of the Project site



Photo B: View looking towards southeast corner of the Project site, from the northwest corner of the Project site



Photo C: View looking towards the southwest corner of the Project site, from the northwest corner of the Project site



Photo D: View looking north towards the northeast corner of the Project site, from the southeast corner of the Project site

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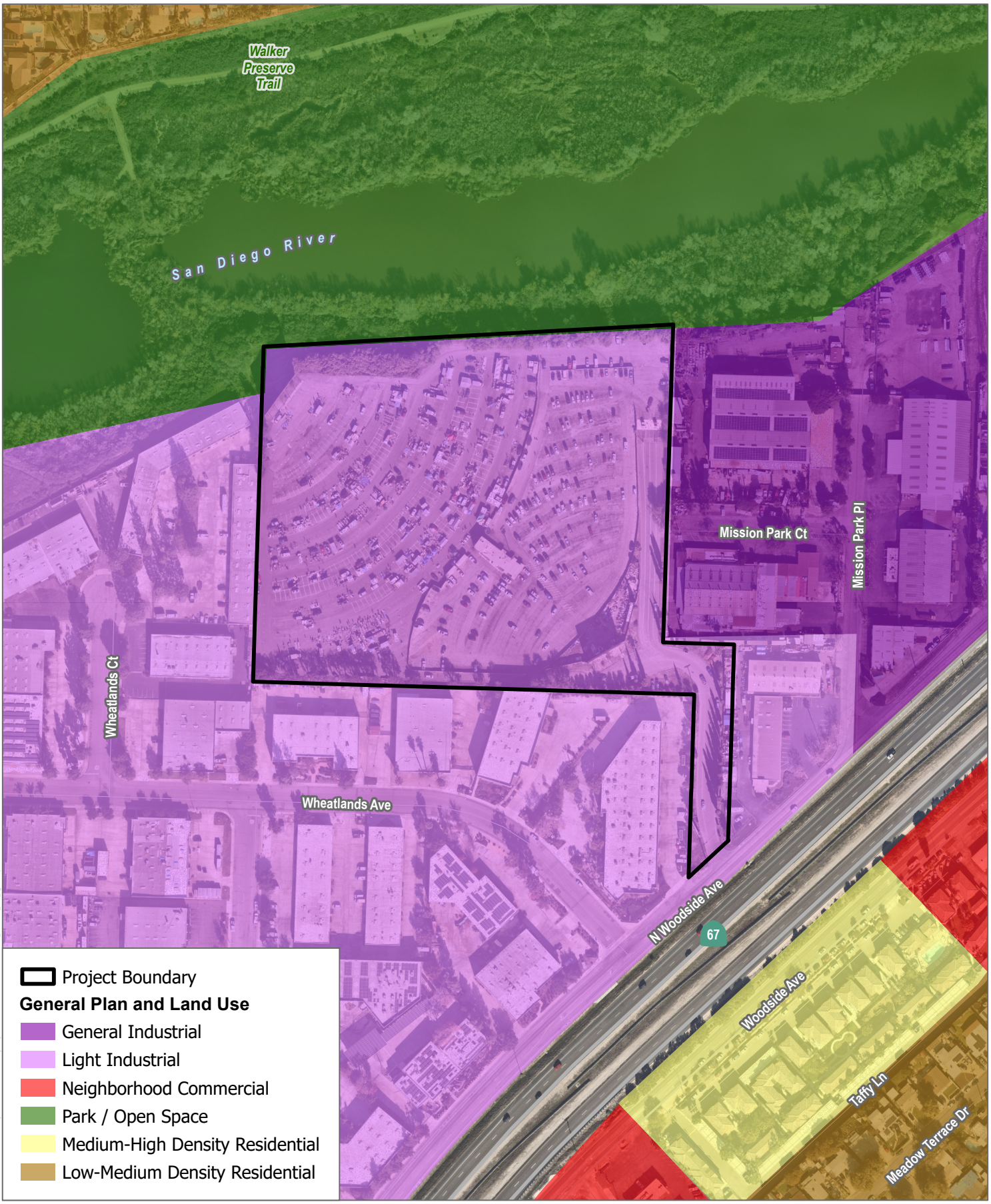
FIGURE 3-4

Existing Conditions

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps, City of Santee 2023

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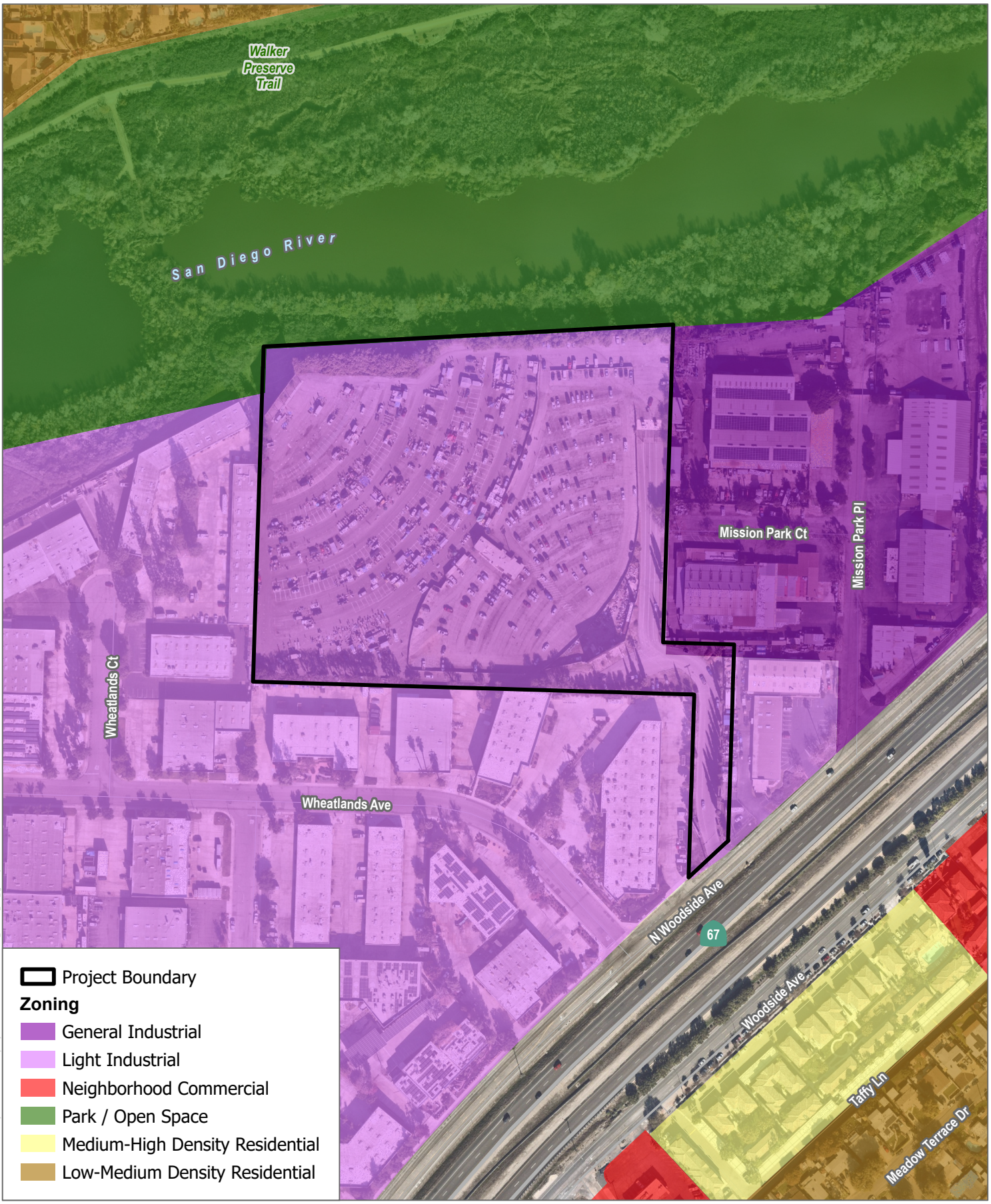
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FIGURE 3-5

General Plan Land Use

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps, City of Santee 2022

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0 100 200 Feet

FIGURE 3-6

Zoning

Palisade Santee Commerce Center Project

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Woodside Avenue

Woodside Avenue is an east-west roadway from Magnolia Avenue (where Mission Gorge Road ends) to Chestnut Street in Lakeside. Between Magnolia Avenue and SR-67 southbound-off ramp-Woodside Avenue intersection, Woodside Avenue is a Major Arterial, with four lanes and a center-two-way-left-turn lane (TWLTL). Class II bike lanes are provided on both sides of Woodside Avenue. The posted speed limit is 45 miles per hour.

Woodside Avenue splits into N. Woodside Avenue and Woodside Avenue east of the intersection with the SR-67 southbound off-ramp with N. Woodside Avenue paralleling SR-67 on the north side and Woodside Avenue paralleling SR-67 on the south side. N. Woodside Avenue is the segment between SR-67 southbound-off ramp-Woodside Avenue intersection to Riverford Road in Lakeside and is designated as a Collector Road with a TWLTL. It is currently constructed with one lane in each direction with a center TWLTL and dedicated left-turn lanes at its intersections with Hartley Road and Wheatlands Avenue. North of Wheatland Avenue, the roadway is one lane in each direction without a TWLTL or dedicated left-turn lanes at intersections. There are Class II bike lanes on both sides of the N. Woodside Avenue. On-street parking is permitted along north side of N. Woodside Avenue. There are intermittent sidewalks along the roadway. The posted speed limit in the vicinity of the Project is 40 MPH.

Magnolia Avenue

Magnolia Avenue is a north-south roadway. It is classified as a Major Arterial north of Mission Gorge Road and Prime Arterial from Mission Gorge Road up to Prospect Avenue. On-street parking is not permitted along the roadway from Mission Gorge Road up to Prospect Avenue. There is paved sidewalk along Magnolia Avenue. The posted speed limit along the roadway is 45 miles per hour.

Transit

The San Diego Metropolitan Transit System (MTS) provides public transportation throughout Santee and northern San Diego County. The nearest MTS bus routes serving the Project are described below.

- Route 832 runs clockwise from Santee Town Center to northern Santee and back to Santee Town Center via Cuyamaca Street, and Magnolia Avenue. The route operates between 6:17am and 6:56pm on weekdays, with 30-minute headways, and between 8:25am and 4:45pm on weekends with 60-minute headways. The nearest bus stop is located west of the Magnolia Avenue and Mission Gorge Road – Woodside Avenue intersection, approximately 0.90 miles from the Project site.
- Route 833 runs from the Santee Transit Center to the El Cajon Transit Center, via Mission Gorge Road, Magnolia Avenue, and Graves Avenue. The route operates between 5:52am and 6:12pm on weekdays, with 45-minute headways, and between 8:53am and 5:10pm on weekends, with 60-minute headways. The nearest bus stop is located west of Magnolia Avenue and Mission Gorge Road – Woodside Avenue intersection, approximately 0.90 miles from the Project site.
- Route 834 runs in a loop, connecting the Santee Transit Center to the West Hills Parkway area, via Prospect Avenue and Carlton Oaks. The route operates only on weekdays from 6:33am to 3:30pm with 60-minuite headways. The nearest bus stop to the Project site is approximately 2 miles away.

The City of Santee is served by the Green Line Trolley (Route 530), with the sole station located at the Santee Transit Center. The Green Line connects Santee to the larger San Diego region and provides service into Downtown San Diego. The route operates from 5:00am to 1:00am with 15-minute headways on weekdays, and 30-minute

headways on weekends. MTS ACCESS provides complementary, on-demand paratransit service to fulfill the unmet needs of residents such as seniors and persons with disabilities.

Pedestrian and Bicycle Facilities

The General Plan Circulation Element identifies the following bicycle facility classifications, as defined by Caltrans:

- **Class I Bikeway (Bike Path)** provide a completely separated right-of-way designated for the exclusive use of bicycles and pedestrians with crossflows by motor vehicles minimized.
- **Class II Bikeway (Bike Lane)** provides a striped lane designed for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited, but with pedestrian and motor vehicle crossflows permitted.
- **Class III Bikeway (Bike Route)** provides shared use of traffic lanes with cyclists and motor vehicles, identified by signage and street marking such as sharrows.
- **Class IV Bikeway (Cycle Track)** are separated bikeways that provide right-of-way designated exclusively for bicycle travel within the roadway and physically protected from vehicular traffic.

A Class II Bike Lane runs along Woodside Avenue; the bike lane along S. Woodside Avenue connects to bike route along Shadow Hill Road and Northcote Road, however, it does not connect to any other bicycle facility in the City. The Planned Bicycle Network in the Mobility Element is based on Active Santee Plan (2021). It recommends Class II bike lanes along Mission Gorge Road between Riverview Parkway and Magnolia Avenue and along Magnolia Avenue between Mast Boulevard and Mission Gorge Road.

Sidewalks and pedestrian facilities are provided along one side of Woodside Avenue, and adjacent roadways within one-half mile of the Project site. While pedestrian facilities such are crosswalks are missing within the immediate Project area, the Santee Active Transportation Plan has identified this area as in need and is committed to improve the area by installing missing segments of sidewalks, adding pedestrian ramps and crosswalks, and relocating utility facilities as needed.

Environmental Baseline

The onsite drive-in theatre operations closed on December 31, 2023 and the site continues to be used as a swap meet on Saturdays and Sundays from 5 a.m. to 1 p.m. This Draft EIR does not consider the elimination of these uses in the calculation of projected Project-related operational emissions and traffic analyses (i.e., the Project's operational emissions are not reduced to account for the elimination of these occupiable buildings); therefore, this Draft EIR provides a conservative assessment of operational impacts. Additional information is provided within the applicable environmental analysis sections in Chapter 4 of this Draft EIR.

3.3 Proposed Project

The proposed Project includes demolition and/or removal of all existing on-site structures (see Section 3.2, Environmental Setting) and the construction of a 300,145 square foot industrial/warehousing building. The individual components of the Project are discussed in further detail below.

3.3.1 Project Components

The proposed Project includes the demolition and/or removal of all existing on-site structures (see Section 3.2, Environmental Setting) and the construction of a 300,145 square foot industrial/warehousing building. The Project would include 290,145 square feet of warehouse space and 10,000 square feet of office space. In addition to the industrial building, the Project would include up to 42 dock-high doors, four grade-level doors, two truck courts, 301 passenger-vehicle parking spaces, 30- and 40-foot-wide fire access lanes along the building perimeter, landscaping, and fencing along portions of the developed perimeter with automated gates at certain driveway locations (Figure 3-7, Conceptual Site Plan). The Project would also include associated utility, stormwater treatment, and roadway improvements. This building is designed to be used primarily to support warehousing and distribution, manufacturing, assembly, and/or research and development operations, and related office uses.

Architecture

The Project's design employs a variety of architectural strategies to create a contemporary, unified, and high-quality business park environment. The proposed buildings would be primarily constructed with concrete tilt-up panels. Building exteriors would feature varying textures, intrusions, and extrusions to create appropriately scaled building façades, similar to other industrial development located throughout the City and region. The building would be up to 50 feet in height and would accommodate warehousing and distribution, manufacturing, assembly, and/or research and development operations, and related office uses. The building would be painted with complementary neutral colors.

The interior truck court areas for the building would be screened and secured by metal fences or concrete screen walls with sliding metal gates across the drive aisle entrances. The fences, screen walls and gates would be approximately 8 feet tall and the gates would be painted steel rolling gates. A 2-foot gravity retaining wall would also be installed along the south boundary of the Project site, near parking areas per City regulation standards. The walls would have a vandal-free treatment and would be painted with colors complementary to the building.

Representative building elevations are provided in Figure 3-8, Representative Architectural Elevations.

Landscaping and Lighting Improvements

As depicted in Figure 3-9, Landscape Plan, landscaping is proposed for the passenger vehicle parking area, around the portions of the building visible from off-site areas, as well as the site's frontages. Landscaping along the site's frontages would include a mixture of trees, shrubs, and groundcover. Proposed trees include 15-gallon Italian Cypress, 36-inch box Multi-Trunk Desert Museum Palo Verde Trees, 24-inch box Holly Oaks, 24-inch box Afghan Pines, 36-inch Coast Live Oaks, 15-gallon Brisbane Box Trees, 15-gallon Austrian Willows, and 15-gallon Western Sycamore Trees. The landscaping materials along the Project frontages incorporate a layering concept to provide different height trees and border or accent shrubs and low ground covers. The landscape plan is required to comply with the City of Santee Water Efficient Landscape Ordinance, Chapter 13.36 of the zoning code.

Light spillover, trespass, and potential glare from Project lighting are regulated by Section 13.30.030(B) of the Santee Municipal Code. The code requires that all lights and illuminated signs must be designed and adjusted to reflect light away from any road or street, away from any adjoining premises, and shall be shielded or directed to not cause glare on adjacent properties or motorists. As proposed, new sources of lighting would be a mix of pole-mounted and wall-mounted lighting fixtures installed in parking and truck loading areas, along building exteriors, near the building office, and the site entrance off North Woodside Avenue. Light controlling devices, such as light

guards, would be included where light spillage on adjacent properties could be a concern (i.e., residences and the San Diego River to the north). Project lighting would be designed consistent with the requirements of Section 13.30.030(B) of the Santee Municipal Code. The proposed photometric plan is shown in Figure 3-10.

Site Access, Circulation, and Parking Improvements

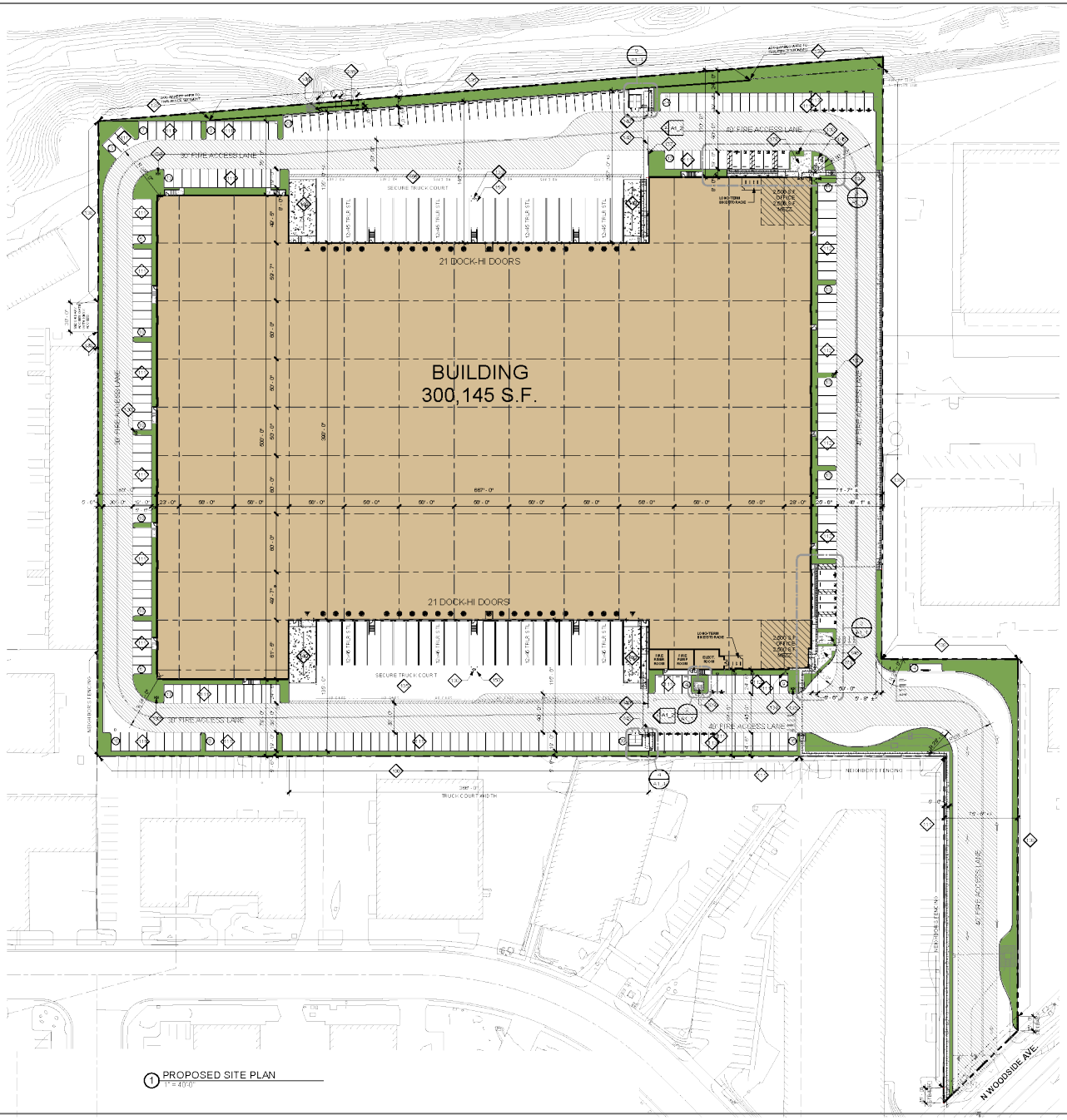
Primary vehicular site access would be provided via N. Woodside Avenue. The existing driveway that occupies the flag of the Project's lot between N. Woodside Avenue and the main area of the Project site would be extended to loop around the entire Project site in order to allow fire lane access from all sides of the building. The width of the internal roadway is between 30 feet to 40 feet. The driveway from N. Woodside Avenue to the Project's driveway will be designed per City's Standard Drawings and requirements of the Fire Code to provide turn radii for fire truck and apparatus to access all parts of the site. Signage and striping would be provided to demarcate fire lanes and clear spaces throughout the site. All gated entryways would include rapid-access Knox boxes to provide emergency access to gated areas.

Paved passenger vehicle parking areas would surround the building, while loading docks would be located on the north and south sides of the building. The Project would provide approximately 42 loading dock-high positions and four concrete truck ramps to allow access through grade-level roll-up doors. The truck dock areas would be surrounded by concrete building walls on three sides, forming north and south truck courts. 301 passenger vehicle parking spaces would be located around the perimeter of the building. The parking ratio used to calculate on-site parking requirements is consistent with Santee Municipal Code (SMC) Section 13.24.040.B.6[1]. The proposed Project is primarily a warehousing and distribution facility with associated office and ancillary uses. Accordingly, in conformance with SMC Chapter 13.24, one parking space is provided per 1,000 square feet of gross floor area for this land use category which encompasses all potential uses of the building including the proposed office space and any similar warehouse building uses routinely combined with warehousing such as manufacturing, assembly, and research and development. The proposed Project is consistent with the City's parking standards.

Parking designated for electric vehicles (EV), including spaces associated with clean air vehicles will be provided per City requirement. Long-term and short-term bicycle parking[2] will be provided per City's code requirement.

1 City of Santee. https:// ecode360.com/43756953#43756953

2 Bicycles. All commercial and office areas shall provide adequate locking facilities for bicycle parking at any location convenient to the facility for which they are designated. Whenever possible, weatherproofing or facility covering should be used.
Short-Term Bicycle Parking. If the Project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for five percent of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack.
Long-Term Bicycle Parking. For buildings with over 10 tenant-occupants, provide secure bicycle parking for five percent of motorized vehicle parking capacity, with a minimum of one space. Acceptable parking facilities shall be convenient from the street and may include:
i. Covered, lockable enclosures with permanently anchored racks for bicycles;
ii. Lockable bicycle rooms with permanently anchored racks; and
iii. Lockable, permanently anchored bicycle lockers.



KEYNOTES

105	CONCRETE PAVING.
109	(N) TRANSFORMER LOCATION.
111	TYP U.O.N., STANDARD PARKING STALL. 9'-0" WIDE x 19'-0" DEEP
112	EV (ELECTRIC VEHICLE) CAPABLE PARKING STALL. PROVIDE FOR FUTURE EVSE (ELECTRIC VEHICLE SUPPLY EQUIPMENT). MATCH STANDARD STALL SIZE.
113	EVCS (ELECTRIC VEHICLE CHARGING STATION). PROVIDE EVSE (ELECTRIC VEHICLE SUPPLY EQUIPMENT). MATCH STANDARD STALL SIZE.
130	(N) FIRE HYDRANT.
134	FIRE DEPARTMENT CONNECTION (FDC).
135	PRE-CAST CONCRETE FENCE SUPPORTED BY METAL POSTS FROM GREENFIELD FENCE. MIN HEIGHT 8'ABOVE HIGHEST ADJACENT FINISHED GRADE. PAINT BOTH SIDES AND TOP OF WALL.
137	TUBE STEEL FENCE. MIN HEIGHT 8' ABOVE HIGHEST ADJACENT FINISHED GRADE.
138	CHAIN LINK FENCE. MIN HEIGHT 8' ABOVE HIGHEST ADJACENT FINISHED GRADE
143	PAINTED STEEL ROLLING GATE(S). MIN HEIGHT 8' ABOVE HIGHEST ADJACENT FINISHED GRADE OR AS SHOWN ON EXTERIOR ELEVATIONS. PROVIDE KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
145	PAINTED STEEL SWINGING PEDESTRIAN GATE. WHEN OCCURS IN TUBE STEEL FENCE, ALIGN TOP w/ FENCE HEIGHT. WHEN OCCURS IN CONCRETE SCREEN WALL, U.O.N., ALIGN TOP w/ SCREEN WALL. PROVIDE KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
146	2 POSITION BIKE RACK.
149	CONCRETE TRUCK RAMP w/ 42" HIGH CONCRETE TILT-UP GUARD ON OPEN SIDE(S). PAINT ALL SIDES OF GUARD WALLS AND HANDRAILS SEE ARCHITECTURAL DRAWINGS FOR COLOR SCHEDULE.
150	STEEL PIPE BOLLARD PROTECTION POST.
178	OUTDOOR EMPLOYEE BREAK AREA.

LOT AREA

SQUARE FOOTAGE	ACRES
587730 SF	13.49

FLOOR AREA RATIO

BUILDING AREA	SITE AREA	FAR ALLOWABLE	FAR PROVIDED
300145 SF	587730 SF	100%	51.1%

BUILDING AREA SUMMARY

NAME	AREA
GROUND FLOOR	
WAREHOUSE	290145 SF
OFFICE	2500 SF
OFFICE	2500 SF
	295145 SF
MEZZANINE	
OFFICE	5000 SF
	5000 SF
GROUND LEVEL + MEZZANINE	
WAREHOUSE	290145 SF
OFFICE	10000 SF
TOTAL BUILDING AREA	300145 SF

LANDSCAPE AREA SUMMARY

* SEE LANDSCAPE PLAN

TOTAL PARKING REQUIRED

BUILDING USE	BUILDING AREA	PARKING RATIO 1/X	REQ. PARKING
OFFICE	10000 SF	1000	11
WAREHOUSE	290145 SF	1000	291
TOTAL: 4	300145 SF		302

REQUIRED PARKING BREAKDOWN

SPACE TYPE	SPACES REQUIRED
STANDARD STALLS	230
STANDARD ACCESSIBLE STALLS	6
VAN ACCESSIBLE STALLS	2
EV CAPABLE STALL (w/o EVSE)	45
EVCS (EV CAPABLE STALL w/ EVSE)	16
STANDARD ACCESSIBLE EVCS (EV CAPABLE STALL w/ EVSE)	1
VAN ACCESSIBLE EVCS (EV CAPABLE STALL w/ EVSE)	1
TOTAL	301

PARKING PROVIDED

SPACE TYPE	SPACES PROVIDED
STANDARD STALLS	230
STANDARD ACCESSIBLE STALLS	6
VAN ACCESSIBLE STALLS	2
EV CAPABLE STALL (w/o EVSE)	45
EVCS (EV CAPABLE STALL w/ EVSE)	16
STANDARD ACCESSIBLE EVCS (EV CAPABLE STALL w/ EVSE)	1
VAN ACCESSIBLE EVCS (EV CAPABLE STALL w/ EVSE)	1
TOTAL	301

SITE LEGEND

- LANDSCAPE AREA
- CONCRETE PAVING WHEN OCCURS @ PARKING AREAS, DRIVE AISLES, & OR TRUCK COURT. SEE CIVIL DRAWINGS FOR PAVING SECTIONS
- FIRE HYDRANT. PROVIDE PIPE BOLLARD PROTECTION POSTS AS REQUIRED BY THE FIRE AUTHORITY. SEE 3/AD1.1
- STREET LIGHT
- INDICATES AN ACCESSIBLE ROUTE. MUST COMPLY w/ SITE PLAN GENERAL NOTE #6
- PROPERTY LINE
- DOCK HIGH DOOR
- DRIVE THRU. DOOR

SOURCE: Herdman, January 2024

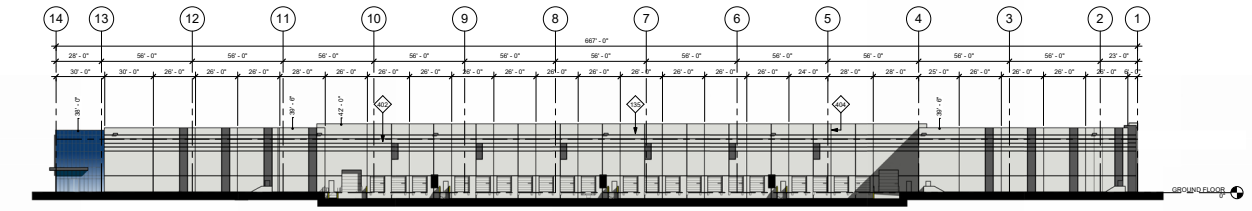
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FIGURE 3-7

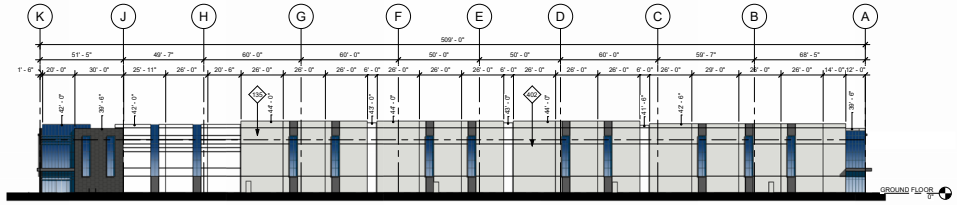
Conceptual Site Plan

Palisades Santee Commerce Center Project

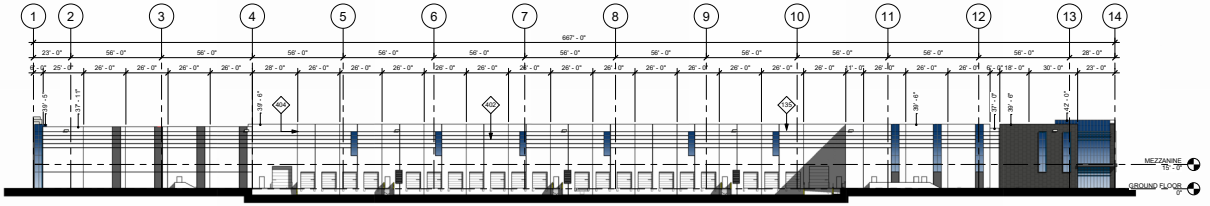
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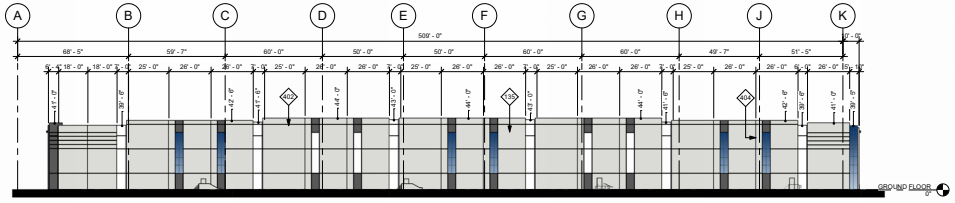
1 PROPOSED NORTH ELEVATION
1" = 30'-0"



2 PROPOSED EAST ELEVATION
1" = 30'-0"



3 PROPOSED SOUTH ELEVATION
1" = 30'-0"



4 PROPOSED WEST ELEVATION
1" = 30'-0"

SOURCE: Herdman, April 2024

FIGURE 3-8

Representative Architectural Elevations

Palisade Santee Commerce Center Project

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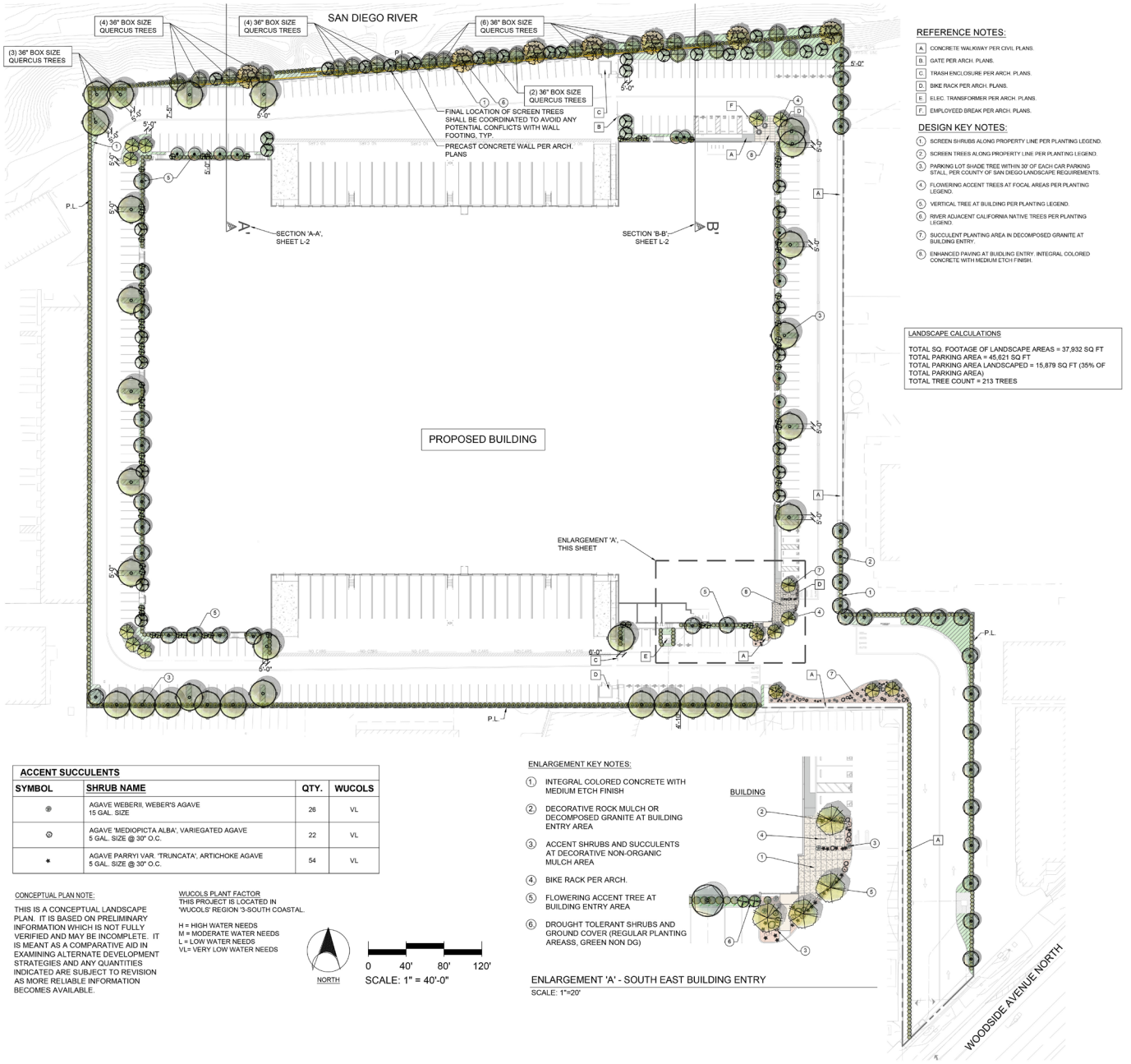
PLANTING LEGEND

TREES			
SYMBOL	**TREE NAME**	**QTY.**	**WUCOLS**
	PRUNUS CAROLINIANA 'COMPACTA', CAROLINA LAUREL CHERRY 15 GAL. SIZE	55	L
	FLOWERING ACCENT TREE AT BLDG AND PROJECT ENTRIES CERCIDIUM FLORIDUM, BLUE PALO VERDE 36" BOX SIZE. MULTI-TRUNK	15	L
	EVERGREEN PARKING LOT SHADE TREE QUERCUS ILEX, HOLLY OAK 24" BOX SIZE [SEE PLAN FOR LOCATION OF (3) 36" BOX SIZE]	27 - 24" 3 - 36"	L
	EVERGREEN SCREEN TREE SALIX SPP., WILLOW 24" BOX SIZE	36	L
	CALIFORNIA NATIVE SCREEN TREE QUERCUS AGRIFOLIA, COAST LIVE OAK 24" BOX SIZE [SEE PLAN FOR LOCATION OF (16) 36" BOX SIZE]	6 - 24" 16 - 36"	L
	VERTICAL GROWING TREE ADJACENT TO BUILDING TRISTANIA CONFERTA, BRISBANE BOX 15 GAL. SIZE	11	M
	VERTICAL GROWING TREE ADJACENT TO BUILDING GEIJERIA PARVIFLORA, AUSTRALIAN WILLOW 15 GAL. SIZE	37	L
	CALIFORNIA NATIVE TREE PLATANUS RACEMOSA, WESTERN SYCAMORE 15 GAL. SIZE	7	M

SHRUBS - SHRUBS SHALL BE CHOSEN FROM THE FOLLOWING:		
SYMBOL	**NAME**	**WUCOLS**
	SAMBUCUS NIGRA, ELDERBERRY 5 GAL. SIZE	L
	SENNA ARTEMISIODES, FEATHERY CASSIA 5 GAL. SIZE	L
	LEUCOPHYLLUM FRUTESCENS, TEXAS RANGER 5 GAL. SIZE	L
	OLEA 'LITTLE OLLIE', DWARF OLIVE 5 GAL. SIZE	L
	LIGUSTRUM TEXANUM, TEXAS PRIVET 5 GAL. SIZE	L
	HETEROMELES ARBUTIFOLIA, TOYON 5 GAL. SIZE	L
	HETEROMELES ARBUTIFOLIA, TOYON 15 GAL. SIZE	L

GROUND COVERS		
SYMBOL	**NAME**	**WUCOLS**
	ACHILLEA 'MOONSHINE', MOONSHINE YARROW 1 GAL. SIZE @ 24" O.C.	L
	LANTANA CAMARA 'DWARF GOLD', DWARF LANTANA 1 GAL. SIZE @ 30" O.C.	L
	STIPA PULCHRA, PURPLE NEEDGRASS 1 GAL. SIZE @ 24" O.C.	M
	SALVIA CLEVLANDII, CLEVLAND SAGE 5 GAL. SIZE @ 48" O.C.	L
	DIANELLA TASMANICA 'VARIEGATA', WHITE STRIPED TASMAN FLAX LILY 1 GAL. SIZE @ 24" O.C.	M
	MYOPORUM PARVIFOLIUM, CREEPING MYOPORUM 1 GAL. SIZE @ 24" O.C.	L
	CARISSA MACROCARPA 'GREEN CARPET', NATAL PLUM 1 GAL. SIZE @ 30" O.C.	M
	ENCELIA CALIFORNIA, 5 GAL. SIZE @ 36" O.C.	L
	AGAVE 'BLUE FLAME', BLUE FLAME AGAVE 5 GAL. SIZE @ 36" O.C.	L
	LEYMUS C. 'CANYON PRINCE', CANYON PRINCE WILD RYE 1 GAL. SIZE @ 36" O.C.	L
	DIETES BICOLOR, FORTNIGHT LILY 1 GAL. SIZE @ 24" O.C.	M
	VERBENA 'DE LA MINA', DE LA MINA VERBENA 1 GAL. SIZE @ 24" O.C.	L
	ASCLEPIAS SUBULATA, DESERT MILKWEED 1 GAL. SIZE @ 30" O.C.	L
	HESPERALOE PARVIFLORA, RED YUCCA 5 GAL. SIZE @ 30" O.C.	L
	YUCCA ROSTRATA, YUCCA 5 GAL. SIZE @ 36" O.C.	L

NOTE: APPLY A 3" MIN. LAYER OF MULCH TOP DRESSING WITHIN ALL PLANTING AREAS. A SAMPLE IS REQUIRED PRIOR TO APPLICATION.



REFERENCE NOTES:

- A. CONCRETE WALKWAY PER CIVIL PLANS.
- B. GATE PER ARCH. PLANS.
- C. TRASH ENCLOSURE PER ARCH. PLANS.
- D. BIKE RACK PER ARCH. PLANS.
- E. ELEC. TRANSFORMER PER ARCH. PLANS.
- F. EMPLOYEED BREAK PER ARCH. PLANS.

DESIGN KEY NOTES:

1. SCREEN SHRUBS ALONG PROPERTY LINE PER PLANTING LEGEND.
2. SCREEN TREES ALONG PROPERTY LINE PER PLANTING LEGEND.
3. PARKING LOT SHADE TREE WITHIN 30' OF EACH CAR PARKING STALL, PER COUNTY OF SAN DIEGO LANDSCAPE REQUIREMENTS.
4. FLOWERING ACCENT TREES AT FOCAL AREAS PER PLANTING LEGEND.
5. VERTICAL TREE AT BUILDING PER PLANTING LEGEND.
6. RIVER ADJACENT CALIFORNIA NATIVE TREES PER PLANTING LEGEND.
7. SUCCULENT PLANTING AREA IN DECOMPOSED GRANITE AT BUILDING ENTRY.
8. ENHANCED PAVING AT BUIDLING ENTRY. INTEGRAL COLORED CONCRETE WITH MEDIUM ETCH FINISH.

LANDSCAPE CALCULATIONS

TOTAL SQ. FOOTAGE OF LANDSCAPE AREAS = 37,932 SQ FT
TOTAL PARKING AREA = 45,621 SQ FT
TOTAL PARKING AREA LANDSCAPED = 15,879 SQ FT (35% OF TOTAL PARKING AREA)
TOTAL TREE COUNT = 213 TREES

ACCENT SUCCULENTS			
SYMBOL	**SHRUB NAME**	**QTY.**	**WUCOLS**
	AGAVE WEBERII, WEBER'S AGAVE 15 GAL. SIZE	26	VL
	AGAVE 'MEDIOPICTA ALBA', VARIEGATED AGAVE 5 GAL. SIZE @ 30" O.C.	22	VL
	AGAVE PARRYI VAR. 'TRUNCATA', ARTICHOKE AGAVE 5 GAL. SIZE @ 30" O.C.	54	VL

CONCEPTUAL PLAN NOTE:

THIS IS A CONCEPTUAL LANDSCAPE PLAN. IT IS BASED ON PRELIMINARY INFORMATION WHICH IS NOT FULLY VERIFIED AND MAY BE INCOMPLETE. IT IS MEANT AS A COMPARATIVE AID IN EXAMINING ALTERNATE DEVELOPMENT STRATEGIES AND ANY QUANTITIES INDICATED ARE SUBJECT TO REVISION AS MORE RELIABLE INFORMATION BECOMES AVAILABLE.

WUCOLS PLANT FACTOR
THIS PROJECT IS LOCATED IN 'WUCOLS' REGION '3-SOUTH COASTAL.

H = HIGH WATER NEEDS
M = MODERATE WATER NEEDS
L = LOW WATER NEEDS
VL= VERY LOW WATER NEEDS

NORTH

0 40' 80' 120'

SCALE: 1" = 40'-0"

ENLARGEMENT KEY NOTES:

1. INTEGRAL COLORED CONCRETE WITH MEDIUM ETCH FINISH
2. DECORATIVE ROCK MULCH OR DECOMPOSED GRANITE AT BUILDING ENTRY AREA
3. ACCENT SHRUBS AND SUCCULENTS AT DECORATIVE NON-ORGANIC MULCH AREA
4. BIKE RACK PER ARCH.
5. FLOWERING ACCENT TREE AT BUILDING ENTRY AREA
6. DROUGHT TOLERANT SHRUBS AND GROUND COVER (REGULAR PLANTING AREASS, GREEN NON DG)

ENLARGEMENT 'A' - SOUTH EAST BUILDING ENTRY

SCALE: 1"=20'

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SOURCE: Herdman, March 2024

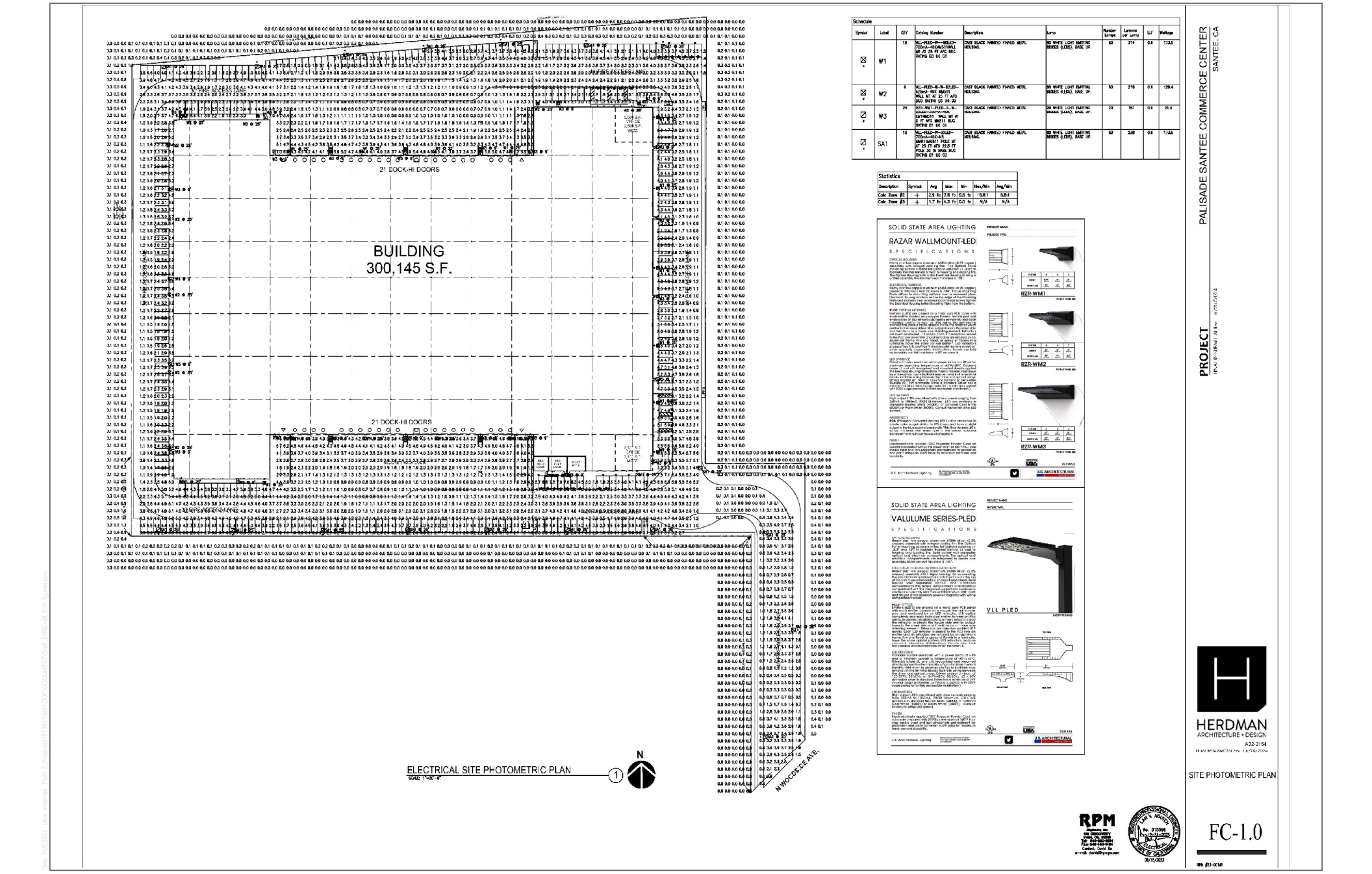
DUDEK

FIGURE 3-9

Landscaping Plan

Palisades Santee Commerce Center Project

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SOURCE: Herdman 2024

DUDEK

0 210 420 Feet

FIGURE 3-10

Proposed Photometric Plan

Palisade Santee Commerce Center Project

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Project Access Driveway/N. Woodside Avenue Improvements

The following improvement measures would be constructed by the Project to improve traffic flow near the Project site:

- The Project would construct a dedicated eastbound left turn lane at the Project Access Driveway/ Woodside Avenue.
- The Project access driveway will be designed per City specifications for commercial driveway per City of Santee standard PW-21[3].
- The Project would be responsible for constructing frontage improvements including sidewalks along the northern side of N. Woodside Avenue and a connection to the existing sidewalk along N. Woodside Avenue that lies to the west of the Project's driveway. No sidewalk exists to the east and accordingly no new sidewalk is required to be constructed.
- The Project would also install a crosswalk to improve pedestrian circulation at the Project Access Driveway/N. Woodside Avenue.

Noise Barrier

The Project includes an eight-foot-tall noise barrier partially along the northern site boundary (see Figure 3-11). This noise barrier will run parallel to the east-west axis of the building and will be centered on the north truck court, with the length of the wall established by extending 45-degree angles from the building corners which form east and west corners of the truck court. A six-foot-wide break in the noise barrier would be provided to facilitate drainage; noise reduction at the drainage break would be achieved by providing a parallel wall located four-feet north of the primary noise barrier and extending approximately 17 feet beyond the east and west edges of the 6-foot drainage break.

Operational Characteristics

Although the future occupants of the proposed building are unknown at this time, the Project applicant anticipates that the building could support a number of light manufacturing and distribution uses, (e.g., warehousing and distribution, manufacturing, assembly, and/or research and development operations, and related office uses) provided that they are permitted in the Light Industrial zone. Cold storage would not be permitted in any of the proposed buildings. For purposes of evaluation in this Draft EIR, it is assumed that the building could be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. Lighting would be subject to compliance with SMC Section 13.08.070(G), which states that parking lot lighting shall be shielded, or recessed, and directed downward and away from adjoining properties. Additionally, the Project's lighting plan is subject to approval by City staff during the plan check process.

In general, the Project's building has been designed such that business operations would be conducted within the enclosed building, with the exception of traffic movement, passenger and truck parking, the loading and unloading of trailers within designated truck courts/loading areas, and the internal and external movement of materials around the Project site via forklifts, pallet jacks, yard hostlers, and similar equipment. Truck trailers are expected to be primarily loaded and unloaded using the dock-high door positions in the north and south truck courts. The design of the truck courts and dock-high door positions allows for material to be loaded and unloaded directly to/from the building without need for the cargo or handling equipment to traverse the truck court or outdoor parking areas. When used outdoors, the outdoor cargo handling equipment used during loading and unloading of trailers

[3] City of Santee. https://www.cityofsanteeca.gov/home/showpublisheddocument/18044/637048465192800000

(e.g., forklifts, yard trucks, hostlers, yard goats, pallet jacks, forklifts) is expected to be a mix of diesel and non-diesel powered per contemporary industry standards. Where diesel cargo handling equipment is used, it will feature Tier 4 Interim engines or better. Additionally, the Project's office and mezzanine space would support general office activities related to business operations. For renderings of the proposed Project, see Figure 3-12a through 3-12f.

The Project will be subject to the Santee Noise Ordinance. Section 5.04.130 of the ordinance states that it is unlawful for any person to engage in loading, unloading, opening, idling of trucks, closing or other handling of boxes, crates, containers, building materials, garbage cans, dumpsters or similar objects between the hours of 10:00 p.m. and 7:00 a.m. in such a manner as to cause a noise disturbance within or adjacent to a residential district.

Utility Improvements

Domestic Water

Domestic water service would be provided by the Padre Dam Municipal Water District. The Project would connect to the existing 12-inch diameter water main within N. Woodside Avenue by removing and replacing an existing segment of 12-inch diameter water main with new, 16-inch water main. From this 16-inch main, the Project would install laterals that would serve 2-inch domestic service, 2-inch landscape service, and a looped 12-inch fire service providing service to the building's fire sprinkler system and on-site fire hydrants.

Sanitary Sewer

Sanitary sewer service would be provided by the Padre Dam Municipal Water District. The Project would connect to the existing sewer manhole cover within the Project Driveway by installing a 6-inch diameter lateral connection.

Storm Drainage

Stormwater currently sheet flows over the parking lot to a low spot in the northwest corner of the site and overflows into the San Diego River over natural terrain. The sheet flow includes off-site water from an existing 24-inch culvert that originates from under CA-67 to the south of the Project. This culvert outlets at the entrance of the site, near the southern terminus of the driveway at N. Woodside Avenue. The culvert collects approximately 2.8 acres of tributary area from the southern side of the CA-67 that then flows through the culvert and across the Project site's natural topography to the San Diego River. The Project's storm drain improvements include intercepting the existing 24-inch culvert and installing an extension to the San Diego River to the north of the Project site. This extension would bypass the proposed on-site storm drain system serving the Project and would maintain the existing drainage pattern for the 2.8-acre tributary area.

The Project would include development of an on-site storm drain system that would accept flows from drain inlets at low spots throughout the site. This stormwater would be directed to subterranean infiltration and retention chambers located in the northern truck court. In a major storm event, overflow would occur via a pipe outlet into the San Diego River. A rip-rap pad at the outlet will provide energy dissipation and will prevent slope scour and erosion.



SOURCE: Herdman 2024

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FIGURE 3-11

Proposed Noise Barrier

Palisade Santee Commerce Center Project

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Looking Northwest Towards the Southeast Corner of Building

SOURCE: Clusters Creative 2024

FIGURE 3-12a

View 1: Ground-Level Rendering of Industrial/Warehouse Building Office and Parking Areas

Palisades Santee Commerce Center Project

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Existing aerial view across Project site; San Diego River, residential development, and local hills and mountains are visible in the distance



Rendering of Proposed Project

SOURCE: Clusters Creative 2024

FIGURE 3-12b

View 2: Isometric Northwest Oriented View of Project Site and Surrounding Area

Palisade Santee Commerce Center Project

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Existing aerial view across Project site; San Diego River, residential development, and local hills and regional mountains are visible in the distance



Rendering of Proposed Project

SOURCE: Clusters Creative, 2024

FIGURE 3-12c

View 3: Isometric North Oriented View of Project Site and Surrounding Area

Palisade Santee Commerce Center Project

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Existing aerial view across San Diego River towards Project site; industrial and commercial buildings, SR-67, residential development, and local hills and distant regional mountains are visible.



Rendering of Proposed Project

SOURCE: Clusters Creative 2024

FIGURE 3-12d

View 4: Isometric Southwest Oriented View Across San Diego River and towards Project Site

Palisade Santee Commerce Center Project

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Existing aerial view across San Diego River towards Project site; residential development, SR-67, and local hills and mountains are visible



Rendering of Proposed Project

SOURCE: Clusters Creative 2024

FIGURE 3-12e

View 5: Isometric Southeast Oriented View Across San Diego River and towards Project Site

Palisade Santee Commerce Center Project

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Existing aerial view towards Project site; industrial and commercial buildings, SR-67, industrial and commercial buildings, and local hills and distant regional mountains are visible



Rendering of Proposed Project

SOURCE: Clusters Creative 2024

FIGURE 3-12f

View 6: Isometric Southwest Oriented View towards Project Site and Surrounding Visual Environment

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Palisade Santee Commerce Center Project

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Gas, Electric, and Telecommunication Facilities

There is currently no gas service to the Project site, and the Project does not include plans to install new gas service.

Electric service is currently provided by San Diego Gas & Electric (SDG&E) and several above ground and underground electrical lines are located adjacent to the Project site and adjacent streets. Several SDG&E poles would be removed and replaced as part of the Project.

Several proprietary telecommunication lines are located adjacent to the Project site. As part of the Project, lateral connections would be made to these existing, electric, and telecommunication lines. Additionally, all above-ground electrical lines within the Project site would be undergrounded.

3.3.2 Project Construction

Based on information provided by the Project applicant, it is assumed that construction of the Project would commence in or around the fourth quarter of 2025[4] and last approximately 15 months. The analysis contained herein is based on the following assumptions (duration of phases is approximate):

- Demolition: October 2025 – November 2025 (1 month)
- Grading: November 2025 – December 2025 (1 month)
- Building Construction: December 2025 – September 2026 (9 months)
- Paving: September 2026 – December 2026 (3 months)
- Architectural Coating: December 2026 – January 2027 (1 month)

Based on a review of the current structures located on the site, demolition activities are anticipated to generate approximately 18,381 tons of debris that would be transported to a landfill permitted to accept inert construction and demolition materials (See Appendix B, Air Quality and GHG Emissions Technical Report). Grading materials would be balanced onsite, resulting in approximately 28,304 cubic yards of cut and 28,304 cubic yards of fill (M. Hellesen, personal communication, August 21, 2023). When grading is complete, the Project site would be generally flat.

Underground utilities would be installed to maximum depth of 11 feet below grade. The underground infiltration chamber for the on-site stormwater drainage system would be installed to an approximate depth of nine feet below finished grade.

During typical Project-related construction activities, equipment is expected to operate 8 hours per day, Mondays through Saturdays, during the permitted daytime hours of 7:00 a.m. to 7:00 p.m. per Santee Municipal Code Section 5.04.090. Should construction activities need to occur at night (such as concrete pouring activities that require air temperatures to be lower than typically occur during the daytime hours), the Project applicant would be required to obtain authorization for nighttime construction activities from the Director of Engineering.

[4] The air quality and greenhouse gas analyses for this Project assume a construction start date of July 2024. It is reasonable to assume the earlier start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

3.3.3 Project Design Features

The Project would implement the following Project Design Features (PDFs).

PDF-AQ-1: Prior to the start of construction activities and issuance of grading permits, the Project applicant, or its designee, shall ensure that all 75 horsepower or greater diesel-powered equipment are powered with California Air Resources Board (CARB)-certified Tier 4 Interim engines or better.

PDF-AQ-2: Require the cargo handling equipment utilized during facility operations after the completion of construction to include forklifts (forklifts and pallet jacks) and yard tractors operating with Tier 4 Interim engines or better.

PDF-AQ-3: During all grading and site preparation activities, the on-site construction superintendent shall ensure implementation of standard best management practices as required by the San Diego Air Pollution Control District (SDAPCD) Rules 50, 51, 52, 54 and 55, Fugitive Dust Control.

PDF-AQ-4: During all grading and site preparation activities, the on-site construction superintendent shall ensure implementation of applicable California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program Measures, as specified on the CalRecycle website.

PDF-AQ-5: The Project shall apply only coatings that meet the requirements of San Diego Air Pollution Control District's (SDAPCD) Rule 67.0.1, Architectural Coatings.

PDF-GHG-1: Per the Sustainable Santee Action Plan Checklist, the Project will include 450kW of solar PV based on 3 kW per 2,000 SF of building area.

PDF-GHG-2: Per the Sustainable Santee Action Plan Checklist, the Project will meet or exceed CALGreen Tier 2 Standards in effect at the time of the building permit application to the satisfaction of the Director of Planning and Building. Documentation shall be provided to the City demonstrating that the Project meets this requirement prior to the issuance of the building permit.

PDF-GHG-3: Per the Sustainable Santee Action Plan Checklist, the Project utilizes tree planting for shade and energy efficiency such as tree planting in parking lots and streetscapes. Landscaping will be installed in the passenger parking area and around portions of the buildings as well as site frontages, including trees, shrubs and cover. See Figure 3-9 of the Landscape Plan.

PDF-GHG-4: Per the Sustainable Santee Action Plan Checklist, roof structures will be designed to include "cool roofs" materials with a minimum aged reflectance and thermal emittance values equal to or greater than the current CALGreen Table A5.106.11.3, Tier 1.

PDF-GHG-5: Per the Sustainable Santee Action Plan Checklist, proposed Project streets will include sidewalks, crosswalks, and other infrastructure that promotes non-motorized

transportation options. The Project will include street, sidewalk, and landscape improvements.

PDF-GHG-6: Per the Sustainable Santee Action Plan Checklist, electric vehicle chargers will be installed in all new commercial developments. The Project includes 16 EVCS (EV Capable Stall with EVSE).

PDF-GHG-7: Per the Sustainable Santee Action Plan Checklist, for new industrial and other Land Uses employing 200 or more employees, e-chargers shall be installed for 5 percent of the total parking spaces. The Project includes 301 total parking spaces (301 x 0.05 = 15 spaces). The Project includes 16 EVCS with EVSE.

PDF-GHG-8: Per the Sustainable Santee Action Plan Checklist, the Project will reduce waste at landfills. The Project will include storage areas for recyclables and green waste as well as food waste.

PDF-GHG-9: The Project shall utilize high-efficiency equipment and fixtures consistent with the current California Green Building Standards Code and Title 24 of the California Code of Regulations.

PDF-GHG-10: The Project shall comply with the Santee Water Efficient Landscape Ordinance. The ordinance promotes water conservation and efficiency by imposing various requirements related to evapotranspiration rates, irrigation efficiency, and plant factors.

PDF-GHG-11: The Project shall comply with Chapters 9.02 and 9.04 of the Santee Municipal Code that pertain to solid waste management and demolition and construction debris recycling.

PDF-NOI-1: The Project will construct an 8'-0" tall approximately 568-foot-long wall along the northern perimeter of the project site. A portion of this wall will include an overlapping wall section to allow for drainage and access. The Project will begin the installation of this wall concurrently with the commencement of rough grading and complete its installation prior to the start of precise grading.

PDF-TRA-1 Multi-modal Intersection Improvements: Prior to the issuance of a building permit, the Project applicant will pay its traffic impact fees to the satisfaction of the City Engineer. Prior to obtaining the Certificate of Occupancy, the project will construct a new on-site sidewalk to connect the main entrance of the building with the existing sidewalk on N. Woodside Avenue. Prior to the issuance of a building permit, ~~T~~the Project applicant will also fund its fair share in the amount of $476,000 payable to the City to rehabilitate the pavement with a full width and adequate structural section of N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to the eastern most edge of the Project driveway's intersection with N. Woodside Avenue~~, to the satisfaction of the City Engineer~~. The Project applicant will install also approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk near N. Woodside Avenue's intersection with the SR-67. The Project will install "KEEP CLEAR'" pavement markings west of this intersection to maintain

vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue.

PDF-WF-1: Prior to the start of construction activities and issuance of grading permits and consistent with the Fire Protection Technical Report prepared for the Project (see Appendix N of this Draft EIR), the Project applicant, or its designee, shall ensure that the Project includes the following fire protection and life safety features: (1) an encircling fire apparatus roadway; (2) a secure Knox box access; (3) dual fire department connections; (4) reliable water supply arrangements; (5) strategically placed fire department access points; (6) ample on-site fire hydrants; (7) an advanced ESFR sprinkler system; (8) a diesel fire pump; (9) a Class I manual wet standpipe system; (10) well-placed exits with illumination and signage; (11) readily accessible fire extinguishers; and (12) the implementation of recommended fire hazard mitigation strategies outlined in Section 7 of the Project FPP (see Appendix N of this Draft EIR).

3.4 Purpose and Need

The City has been identified as an area having a low job–housing ratio (i.e., an area that has more potential workers living in a community than there are jobs for them), resulting in high numbers of residents commuting out of the region for work. Santee scored lower than the County overall (City of Santee 2022). This may be due to the location of the City outside the central areas of the County, where the higher job proximity scores are located. Within the City, higher job proximity scores are located near its boundaries with El Cajon, Poway, and Scripps Ranch (City of Santee 2003). A low jobs-to-housing ratio can result in adverse environmental and economic effects on local communities. Long-distance commutes result in increased traffic and air quality and greenhouse gas emissions, and out-of-region commuters often take a share of their purchasing power with them when they make purchases away from home.

One strategy that community leaders and planners can use to provide residents with local employment is to attract development of warehousing and distribution centers, which can provide hundreds of jobs per million square feet of development. Supply chain constraints, geopolitical risks, and increased shipping traffic have created the need for additional industrial space within the San Diego region, thereby resulting in the creation of new jobs.

Additionally, low industrial vacancy rates within the Southern California region has led to high demand for flexible logistics and distribution facilities. At the close of Quarter (Q) 4 in 2023, vacancy rates within the San Diego County industrial market were 1.2% in the East County Region (Kidder Mathews 2023). These market trends are influenced by a lack of available land for the development of new facilities within the San Diego area.

As such, the Project would help meet the needs of the logistics sector while producing new jobs in an area that historically may have been considered light on jobs and heavier on housing.

3.5 Project Objectives

CEQA Guidelines Section 15124 requires an EIR to include a statement of objectives sought by the Project. The objectives assist the City in developing a reasonable range of alternatives to be evaluated in the EIR. The Project objectives also aid decision makers in preparing Findings of Fact and a Statement of Overriding Considerations, if

necessary. The statement of objectives also include the underlying purpose of a project and describe any project benefits. Consistent with the Project's purpose and need, the primary objectives sought by the Project are as follows:

- **Objective 1:** Establish a jobs-producing and tax-generating commerce center land use near transportation corridors that is constructed to high standards of quality and provides diverse economic opportunities for those residing and wishing to invest within the City of Santee.
- **Objective 2:** Develop a high-quality development for uses in Santee that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar developments in the local area and region.
- **Objective 3:** Develop a facility within the East County region of San Diego County and in close proximity to SR-52 and SR-67 that can be used as part of the Southern California supply chain and goods movement network.
- **Objective 4:** Create a fiscally sound and employment-generating project within an established industrial area.
- **Objective 5:** Concentrate non-residential uses in areas designated for industrial uses which are near existing roadways, highways, and freeways in an effort to isolate and reduce any potential environmental impacts related to truck traffic congestion, air emissions, and industrial noise to the greatest extent feasible.

3.6 Requested Approvals

The following discretionary and ministerial actions under the jurisdiction of the City and other agencies would be required. This EIR covers all state and local government, and quasi-government approvals that may be needed to implement the Project, whether or not they are explicitly listed in this section or elsewhere in this EIR (14 CCR 15124[d]).

City of Santee Discretionary Approval

Consistent with the City's General Plan, and Municipal Code, the Project requires certain entitlements be submitted, reviewed, and approved by the City. The requested entitlements include:

City Council

- **Certification of EIR.** The City Council to decide to certify or reject this EIR, along with appropriate CEQA Findings and the mitigation monitoring and reporting program.
- **Conditional Use Permit.** Project implementation would require approval of a Conditional Use Permit to allow for an increase in building height from the allowed 40' to 50'.
- **Development Review Permit.** Project implementation would require approval of a Development Review Permit to allow for the demolition of existing structures on site and for the development of a new industrial building greater than 50,000 square feet in floor area and associated improvements.

The City will use this EIR and associated documentation in its decision to approve or deny the required discretionary permits. Other responsible and/or trustee agencies can use this EIR and supporting documentation in their decision-making process to issue additional approvals. These additional approvals may include approvals such as a site-specific Stormwater Pollution Prevention Plan.

City of Santee Ministerial Approvals

- Permits associated with the improvements to Woodside Avenue.
- Any other ministerial actions required by the City including post-entitlement grading and building permits

Other Agency Approvals

- Proposed improvements within the Caltrans right-of-way (ROW) at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection would be subject to approval by Caltrans.
- Compliance with State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities.

4 Environmental Analysis

Approach to the Environmental Analysis

This Draft Environmental Impact Report (Draft EIR) evaluates and discloses the environmental impacts associated with the Palisade Santee Commerce Center Project (Project), in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulation, Title 14, Chapter 3, Section 1500, et seq.). Sections 4.1 through 4.14 of this Draft EIR present a discussion of environmental setting, regulatory setting, significance criteria, environmental impacts associated with the project, mitigation measures to reduce the level of impact, and residual level of significance (i.e., after application of mitigation, including impacts that would remain significant and unavoidable after application of all feasible mitigation measures). Issues evaluated in these sections consist of the environmental topics identified for review in the Notice of Preparation (NOP) prepared for the project (see Appendix A of this Draft EIR) and in Section 2.5.3 of this Draft EIR, Environmental Issues Determined to be Potentially Significant. Chapter 5 of this Draft EIR, Effects Found Not to be Significant, briefly describes potential environmental effects that were determined not to be significant and therefore are not discussed in further detail in the EIR, as required by Section 15128 of the CEQA Guidelines, and includes an analysis of the project's growth inducing impacts, as required by Section 21100(b)(5) of CEQA. Chapter 6 of this Draft EIR, Other CEQA Considerations, presents an analysis of the project's impacts considered together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the State CEQA Guidelines and includes an analysis of the project's growth inducing impacts, as required by Section 21100(b)(5) of CEQA. Chapter 7, Alternatives, presents a reasonable range of alternatives and evaluates the environmental effects of those alternatives relative to the proposed Project, as required by Section 15126.6 of the State CEQA Guidelines.

Section 4.1 through 4.14 of this Draft EIR include the following components:

- **Existing Conditions:** Provides information describing the existing environmental conditions on the project site and in the surrounding area as appropriate, in accordance with State CEQA Guidelines Section 15125. This setting discussion describes the conditions that existed when the NOP was posted for public review and submitted to the State Clearinghouse.
- **Relevant Regulations, Plans, Policies, and Ordinances:** Provides a discussion of existing federal, state, regional, and local regulations, plans, policies, and ordinances applicable to the Project.
- **Thresholds of Significance:** Provides criteria for determining the significance of Project impacts for each environmental issue.
- **Impact Analysis:** Provides a discussion of the characteristics of the Project that may have an impact on the environment, analyzes the nature and extent to which the Project is expected to change the existing environment, and indicates whether the Project's impacts would meet or exceed the level of significance thresholds.

  Mitigation Measures and Level of Significance After Mitigation: Mitigation measures are identified, as feasible, to avoid, minimize, rectify, reduce, or compensate for significant or potentially significant impacts, in accordance with the State CEQA Guidelines Section 15126.4. A "less-than-significant" impact is one that would not result in a substantial adverse change in the physical environment. A "potentially significant" impact or "significant" impact is one that would result in a substantial adverse change in the physical environment; both are treated the same under CEQA in terms of procedural requirements and the need to identify feasible mitigation. Significant and unavoidable impacts are identified as appropriate in accordance with State CEQA Guidelines Section 15126.2(c).

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4.1 Aesthetics

This section describes the existing visual conditions of the Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary, to reduce or avoid significant impacts related to implementation of the Project. A series of 3D visual simulations of the Project are included to aid in the description of anticipated visual change associated with proposed development of the Project site.

4.1.1 Existing Conditions

Local Context

The City of Santee (City) comprises a mix of different land use types and density. Single-family residential uses comprise the largest land use totaling approximately 2,418 acres (City of Santee 2003; Table 1-1, Existing Land Use Inventory). The other residential use types occurring throughout the City include multifamily residential (apartments and condominiums), and mobile home parks, which are primarily located near the City's highly traveled roads including Mission Gorge Road, Magnolia Avenue and Prospect Avenue. The 700-acre Town Center district forms a downtown core comprised of business parks, high-density residential and retail businesses that feed off the synergy of Santee Trolley Square shopping complex and the Metropolitan Transit System trolley station (City of Santee 2023a). Industrial uses are concentrated in the south-central portion of the City, generally along Prospect Avenue, Magnolia Avenue and Cuyamaca Street, and north of Woodside Avenue along the San Diego River corridor, within the vicinity of the Project site (City of Santee 2003).

Project Site and Surrounding Area

As shown on Figure 3-3, Project Aerial, and Existing Uses in Chapter 3, the approximately 13.43-acre Project site is currently developed with a drive-in theatre and a primarily single-story building containing restrooms, concessions, and a projection house. There are two projection screens on site. The first is located at the southeast corner of the site and is approximately 77 feet wide by 51 feet tall. The second is located at the northwest corner of the site and is approximately 100 feet wide by 65 feet tall. In addition, existing perimeter landscaping within the Project Boundary includes (among others) eucalyptus, pepper, and Italian cypress trees. See Figure 3-4, Existing Conditions. The site is accessible from North Woodside Avenue and contains two ingress lanes (transitioning to a total of four ingress lanes) and one egress lane. The ingress lanes pass two small rectangular ticket booths. The site is paved with striped parking spaces aligned in a half concentric pattern with approximately 75 percent of the spaces oriented towards the drive-in screen in the northwest corner of the site and remainder oriented towards the drive-in screen in the site's southeast corner. Parking spaces associated with the screen in the site's southeast corner are enclosed by a chain-link fence featuring sections of opaque, mint-colored metallic sheets. The aforementioned building is located near the center of site. The site contains some variable terrain in the northeastern corner (see Figure 3-4). The Project site boundary extends beyond the paved drive-in parking area into the undeveloped area south of the San Diego River.

The land uses surrounding the Project site consist of a mix of industrial, manufacturing, automotive, commercial, open space, and residential uses. Buildings in the immediate surrounding area are generally two- or one-story in scale, and of the industrial business park architectural style with limited ornamentation, street-facing entrances and alley accessed entrances protected by metal roll up doors. Property landscaping is typically limited to perimeter tree plantings, street-facing shrubs and other elements nearby building entrances and limited occurrence of turf

near parkways. The San Diego River abuts the northern boundary of the Project site. The San Diego River Trail/Walker Preserve Trail is located directly on the north side of river. The Project site boundary extends slightly beyond the pavement into the undeveloped area located approximately 20 to 30 feet above the San Diego River corridor. Four vegetation communities or land cover types (i.e., non-native grassland, non-native woodland, disturbed habitat, and urban/developed land) occur within the Project site and 10 vegetation communities or land cover types occur within the 500-foot buffer surrounding the Project site. Please refer to Table 4.3-1 in Chapter 4.3, Biological Resources of this Environmental Impact Report (EIR) for a detailed description of vegetation communities in the study area.

Surrounding land uses and elements that contribute to the visual environment in the project area are described as follows:

- **North:** San Diego River, with the San Diego River Trail/Walker Preserve Trail and residential uses along Hillcreek Road beyond
- **South:** Industrial and manufacturing uses, and Wheatlands Avenue, North Woodside Avenue, and SR-67
- **East:** Industrial and manufacturing uses, and Mission Park Court and Mission Park Place
- **West**: Manufacturing and commercial uses, and Wheatlands Court

Scenic Vistas

According to the General Plan, the City's diversity of open space resources provide numerous beneficial functions including the provision of scenic relief and vistas (City of Santee 2003). The San Diego River and adjacent floodway is included among the approximate 3,000 acres of open space lands in the City and according to the City, the orientation of the San Diego River corridor creates impressive long views within Santee and to the surrounding ridgelines and mountains (including El Capitan) (City of Santee 2003). In addition to local features, regional and local mountains and hills provide a scenic backdrop for the City as well as opportunities for distinctive scenic views and vistas. According to the City's General Plan Community Enhancement Element, the major ridgeline and hillside systems provided by the undeveloped areas of the northern portion of the City, including the Fanita Ranch, present a substantial portion of these views and vistas. Rattlesnake Mountain and Mission Trails Regional Park also provide significant views from within Santee (City of Santee 2003).

The Project site abuts the San Diego River, and the San Diego River Trail/Walker Preserve Trail parallels the river on the north (at its closest, the trail is within 620 feet of the northern boundary of the Project site). In addition to the river floodway, the San Diego River Trail/Walker Preserve Trail offers users views to Rattlesnake Mountain (located approximately one mile to the southeast of the Project site).

Scenic Routes

According to the California Department of Transportation Scenic Highway Mapping System, the Project site is not located adjacent to, or in the vicinity of, a designated state scenic highway (Caltrans 2024a). The nearest officially designated state scenic highway is a segment of State Route (SR) 52 as it travels adjacent to Mission Trails Regional Park (approximately Santo Road in San Diego to Mast Boulevard in Santee). This segment is located approximately four miles to the west of the Project site. SR-52 (from Mast Boulevard in Santee to SR-67 in Santee) is the nearest eligible state scenic highways to the Project site, which is located approximately one mile south of the Project site (Caltrans 2024a). Due to distance and intervening terrain, the Project site is not visible from SR-52 or any other state scenic highway in San Diego County.

Light and Glare

While limited light fixtures are installed on the project site, the drive-in is no longer operational. As such, it does not feature operable sources of artificial nighttime light. Streetlights are present along Wheatlands Court and North Woodside Avenue to the west, south, and east, and are sources of nighttime light. Other exterior artificial light sources in the immediate vicinity of the Project site include nearby industrial uses bordering the site to the south, east, and west. There are no existing sources of light or glare from the San Diego River abutting the Project site to the north, however, typical residential light sources in the residential neighborhood to the north of the Project site and San Diego River may be visible from the Project site.

4.1.2 Relevant Plans, Policies, and Ordinances

State

California Scenic Highway Program

The California State Legislature created the California Scenic Highway Program in 1963 with the intent "to protect and enhance the natural scenic beauty of California highways and adjacent corridors, through special conservation treatment." The state laws that govern the Scenic Highway Program are Sections 260 through 263 of the Streets and Highways Code. A highway may be designated scenic based on the natural landscape visible by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the views of the highway. The Scenic Highway Program includes both officially designated scenic highways and highways that are eligible for designation. A highway may be designated as scenic based on aesthetic quality of viewable landscape, extent of views upon the natural landscape, and the degree to which development impedes these views. It is the responsibility of local jurisdictions to apply for scenic highway approval, which requires the adoption of a Corridor Protection Program (Caltrans 2024b).

Assembly Bill 98

On September 29, 2024, California Governor Gavin Newsom signed California Assembly Bill 98 (AB 98) into law. This bill, which is part of California's ongoing efforts to regulate warehousing and trucking activity to reduce emissions and enhance community health, will increase the state's regulation of warehouses, including truck routes into warehouses. However, the bill also imposes additional costs and regulatory burdens to warehouse and truck operators in the state. AB 98 becomes effective on Jan. 1, 2026. AB 98 mandates several environmental and community health protections. The bill focuses on regulating the construction and operation of new or expanded warehouses that are 250,000 square feet or larger. Key provisions include:

- installation of energy-saving features such as solar panels and electric vehicle charging stations
- transition to zero-emission forklifts by 2030
- establishment of buffer zones between warehouses and sensitive areas such as homes, schools and parks
- establishment of truck routes that avoid residential areas

It should be noted that the law does not apply to applications filed prior to September 30, 2024, which includes the proposed Project.

California Code of Regulations

Title 24 – California Building Standards Code

Title 24, California Building Standards Code, consists of regulations to control building standards throughout the state. The following components of Title 24 include standards related to lighting:

Title 24, Part 1 – California Building Code / Title 24, Part 3 – California Electrical Code

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for pedestrian pathways, circulation ways, parking lots, and paths of egress.

Title 24, Part 6 – California Energy Code

The California Energy Code (CEC) (Title 24, Part 6) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment. Section 130.2 sets forth requirements for Outdoor Lighting Controls and Luminaire Cutoff requirements. All outdoor luminaires rated above 150 watts shall comply with the backlight, up light, and glare (BUG) ratings in accordance with IES TM-15-11, Addendum A, and shall be provided with a minimum of 40% dimming capability activated to full on by motion sensor or other automatic control. This requirement does not apply to streetlights for the public right of way, signs, or building facade lighting.

Section 140.7 establishes outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by the Lighting Zone, as defined in Section 10-114 of the CEC. Under Section 10-114, all urban areas within California are designated as Lighting Zone 3. Additional allowances are provided for Building Entrances or Exits, Outdoor Sales Frontage, Hardscape Ornamental Lighting, Building Facade Lighting, Canopies, Outdoor Dining, and Special Security Lighting for Retail Parking and Pedestrian Hardscape.

Section 130.3 stipulates sign lighting controls with any outdoor sign that is on during both day and nighttime hours must include a minimum 65% dimming at night. Section 140.8 of the CEC sets forth lighting power density restrictions for signs.

Title 24, Part 11 – California Green Building Standards Code

The California Green Building Standards Code (CALGreen) (Title 24, Part 24) is commonly referred to as the CALGreen Code. The CALGreen Code stipulates maximum allowable light levels, efficiency requirements for lighting, miscellaneous control requirements, and light trespass requirements for electric lighting and daylighting. Paragraph 5.1106.8 Light Pollution Reduction, specifies that all non-residential outdoor lighting must comply with the following:

- The minimum requirements in the CEC for Lighting Zones 1-4 as defined in Chapter 10 of the California Administrative Code; and
- BUG ratings as defined in the Illuminating Engineering Society of North America's Technical Memorandum on Luminaire Classification Systems for Outdoor Luminaires (IESNA TM-15-07); and
- Allowable BUG ratings not exceeding those shown in Table A5.106.8 in Section 5.106.8 of the CALGreen Code; or
- Comply with a local ordinance lawfully enacted pursuant to Section 101.7, whichever is more stringent.

IESNA Recommended Practices

Illuminating Engineering Society of North American (IESNA) recommends illumination standards for a wide range of building and development types. These recommendations are widely recognized and accepted as best practices and are a consistent predictor of the type and direction of illumination for any given building type. For all areas not stipulated by the regulatory building code, municipal code, or specifically defined requirements, the IESNA standards are used as the basis for establishing the amount and direction of light for the Project. The IESNA provides recommendations for pre-curfew and post-curfew light levels to limit light trespass. Pre-curfew is from dusk until 11:00 p.m. local time, when the area being illuminated is more likely to be in use. Post-curfew is from 11:00 p.m. to 7:00 a.m. local time (NLPIP 2007).

The IESNA 10th Edition Lighting Handbook defines lighting zones (LZ) relative to ambient light levels, which are used to establish a basis for outdoor lighting regulations. The existing conditions surrounding the Project site are best described as LZ 3, which has a maximum recommended light trespass limit of 8 lux (0.74 foot-candles) during pre-curfew hours and 3 lux (0.28 foot-candles) during post-curfew hours.

Local

City of Santee General Plan

Conservation Element

The purpose of the Conservation Element is to identify the community's natural and man-made resources and to encourage their wise management in order to assure their continued availability for use, appreciation, and enjoyment. The Conservation Element includes policies and implementation measures to encourage the conservation and proper management of natural resources and open space areas in the City. The following objectives and policies from the City of Santee General Plan, Conservation Element and Community Enhancement Element pertain to aesthetics and visual quality (City of Santee 2003):

Conservation Element Objective 1.0 Protect areas of unique topography or environmental significance to the greatest extent possible.

Policy 1.1 The City shall encourage significant natural landforms to be maintained during development whenever possible.

Conservation Element Objective 10.0 Preserve significant natural resources, such as mineral deposits, biological resources, watercourses, groundwater, hills, canyons, and major rock outcroppings, as part of a Citywide open space system.

Policy 10.2 Preserve significant natural resources, such as mineral deposits, biological resources, watercourses, groundwater, hills, canyons, and major rock outcroppings, as part of a Citywide open space system.

Community Enhancement Element Objective 8.0 Improve the appearance and function of existing and planned industrial areas.

Policy 8.4 The City shall ensure that all industrial development is attractive and of high-quality design to enhance the image of the City.

City of Santee Municipal Code

Chapter 13.14 Industrial Districts

The Project site is zoned for Light Industrial, per the City's Zoning Code. Pursuant to Chapter 13.14 of the City's Municipal Code, permitted uses in the Light Industrial zone include warehousing/distribution, assembly and light manufacturing, repair facilities, and business parks, including corporate offices (City of Santee 2023b,). The applicable maximum allowable building height in the Light Industrial zone is 40 feet; however, and as indicated in Table 13.14.040A, Site Dimensions and Height Limitations, of the City's Municipal Code, proposals for development exceeding [40 feet] shall require the approval of a conditional use permit.

Chapter 13.30 General Development and Performance Standards

Regarding lighting, Section 13.30.030 (B), Performance Standards (Lighting) requires adequate lighting of all public parking areas. In addition, and pursuant to Section 13.30.030(B), all lighting shall be designed and adjusted to reflect light away from any road or street, and away from any adjoining premises. Lastly, all lights and illuminated signs shall be shielded or directed so as to not cause glare on adjacent properties or to motorists.

4.1.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts on aesthetics are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to aesthetics would occur if the Project would:

A. Have a substantial adverse effect on a scenic vista.
B. Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
C. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
D. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4.1.4 Impacts Analysis

A series of 3D visual simulations of the Project were prepared to aid in the description of anticipated visual change associated with proposed development of the Project site. The 3D simulations include true scale 3D models for the Project that are then rendered onto camera matched site photographs. The 3D simulations show the Project at completion and combined with the existing conditions photograph, present the visual change anticipated to occur as a result of project implementation.

Baseline images from selected representative public vantage points in the surrounding area with available views to the Project site were captured on May 16, 2024 when viewing conditions were clear and atmospheric conditions were generally sunny. Low clouds were present during the May 16 field survey at one of the three selected vantage points. The selected representative public vantage points and their proximity to the Project site are presented in

Table 4.1, Representative Vantage Points, below. The locations of representative vantage points are shown on Figure 4.1-1, Vantage Points, and the existing condition and 3D simulations from the three vantage points are shown on Figures 4.1-2, 4.1-3, and 4.1-4.

Table 4.1-1. Selected Public Vantage Points

Number	Location and Proximity to Project Site	Viewer Type
1	River Trail #1 – 0.32 mile to northwest of Project	Trail user
2	River Trail #2 – 0.15 mile to northeast of Project	Trail user
3	Northcote Road – 0.15 mile to southeast of Project	Motorist/road user

In addition to the 3D simulations described above, a series of artistic renderings of the Project were prepared and are presented as Figures 3-12a through 3-12f. Renderings demonstrate the proposed bulk and scale of the building, rooftop elements, intended plantings included in the landscape plan, and address compatibility of the project within the context of the surrounding area.

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

Less-than-Significant Impact The proposed Project includes demolition and/or removal of all existing on-site structures (i.e., drive-in theatre screens, restroom and snack bar building, ticket booths, and fencing) and the construction of a 300,145 square foot industrial/warehousing building. The proposed building height would be up to 50 feet.

As stated in Section 4.1.1, the open space resources within the City and adjacent areas provide opportunities for scenic vistas. Specifically, within the Project area, views to the San Diego River and adjacent floodway, and Rattlesnake Mountain, are available from public vantage points located north of the river including from the San Diego River Trail/Walker Preserve Trail and Sandy Creek Drive. At its closest point, the river trail is located approximately 610 feet north of the Project site, and Sandy Creek Drive is located approximately 1,130 feet to the northwest of the northwestern corner of the Project site. As viewed from the river trail, the San Diego River riparian corridor (specifically, dense trees and shrubs) dominates the foreground and existing features on the Project site (located south of the river) do not obstruct of interrupt existing views from the trail to the San Diego River riparian corridor or background hillsides. Figures 4.1-2 and 4.1-3 capture representative views from the river trail towards the Project site. For the same reasons, proposed development on the Project site would not obstruct or interrupt views from the river trail to the San Diego River and riparian corridor. The façades of the proposed building would be visible from segments of the trail (facades would be detectable above foreground vegetation) but the proposed building scale and mass would not result in substantial blockage of an existing scenic resource nor would it result in the significant additional interruption of views to the foreground river corridor or background hillsides. Also, as viewed from the river trail, Rattlesnake Mountain is regularly blocked from view by upland and riparian vegetation within the San Diego River floodway. Where clear views to Rattlesnake Mountain are available (such as at Vantage Points 1 and 2), building scale would not adversely affect the existing quality of the view. See Figures 4.1-2 and 4.1-3.

Similarly, the proposed building would be visible from segments of SR-67 and nearby roadways to the north including Northcote Road but the introduction of the Project would not result in substantial blockage of a scenic vista or resource. See Figure 4.1-4. Lastly and as viewed from Sandy Creek Drive, Rattlesnake Mountain is not located in line with the Project site or existing built features on the Project site. An existing view south and southeast toward Rattlesnake Mountain from Sandy Creek Drive is provided in Figure 4.1-5.

From the river trail, the existing drive-in theatre screen in the northwest corner of the Project site is occasionally visible through gaps in tall vegetation; however, since the proposed maximum height of the industrial/warehouse building (up to 50 feet) would be less than the maximum above ground height of the closest onsite drive-in theatre screen, views through the site and toward Rattlesnake Mountain may be improved. From select river trail locations, the upper portions of the proposed industrial/warehouse building may be visible, but the majority of the building would be blocked from view by intervening riparian vegetation in the river corridor and by proposed screen trees to be planted along the site's northern boundary. See Figure 4.1-6, Landscape Sections and River Trail View Corridors, that depicts approximate south-oriented cross-sections from the River Trail toward the northwestern corner (Section A'-A') and northeastern corner (Section B'-B') of the proposed building. Figures 4.1-2 through 4.1-4 also detail the partially blocked nature of views to the Project from nearby segments of the river trail and from Northcote Road.

As captured in Figures 4.1-2 through 4.1-5, the drive-in theatre screens are currently viewed as rectangular forms in a built landscape of comparably lower, rectangular industrial buildings with flat rooflines and lightly colored exteriors. Introduction of the proposed project, which would consist of similar built characteristics as nearby industrial/commercial buildings, would result in an overall more cohesive visual environment. Because construction and operation of the proposed project would not substantially obstruct, interrupt, or otherwise degrade views to Rattlesnake Mountain from either the San Diego River Trail/Walker Preserve Trail or Sandy Creek Drive, impacts to scenic vistas from these public vantage points would be less than significant.

While taller equipment including cranes used for demolition and construction activities on the Project site may be visible from Sandy Creek Drive and the San Diego River Trail/Walker Preserve Trail, the temporary presence of construction equipment in views would not have a substantial adverse effect on views to the San Diego River and adjacent floodway. Cranes and similar tall equipment would operate onsite temporarily and would be removed from the site (and public views) upon completion of activities and structures requiring their use. Further, the tall and narrow form and line of cranes located on the Project site (south of the river) and would have overall minor effects on views to the river and the river's riparian corridor from public vantage points north of the river. Similarly and once in the operational phase, the introduction of an up to 50 foot high, industrial/warehousing building on site surrounded by existing industrial and commercial buildings of similar form, color, and scale would not obstruct, substantially interrupt, or degrade river trail or Sandy Creek Drive views to the river and adjacent floodway. Impacts would be **less than significant**.

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

No Impact. There are no state scenic highways that occur within the vicinity of the Project site. The nearest officially designated state scenic highway, State Route (SR) 52 as it travels adjacent to Mission Trails Regional Park (approximately Santo Road in San Diego to Mast Boulevard in Santee) is located approximately four miles to the west of the Project site. SR-52 (from Mast Boulevard in Santee to SR-67 in Santee) is the nearest eligible state scenic highway to the Project site, which is located approximately one mile south of the Project site. Based on this distance and intervening natural topography and development, the Project site is not located within the viewshed of either segment of SR-52. Therefore, **no impacts** associated with state scenic highways would occur.



SOURCE: Bing Maps 2024

DUDEK

0 210 420 Feet

FIGURE 4.1-1

Vantage Points

Palisade Santee Commerce Center Project

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Existing view from eastbound segment of the River Trail towards the Project site (located 0.32 mile away)



Visual Simulation of Proposed Project (west and north facades of the building visible)

SOURCE: Clusters Creative 2024

FIGURE 4.1-2

Vantage Point 1: River Trail Location #1

Palisades Santee Commerce Center Project

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Existing view from a southbound segment the River Trail connector to Hillcreek Road towards the Project site (located 0.15 mile away)



Visual Simulation of Proposed Project (north and east (partial) facades of the building visible

SOURCE: Clusters Creative 2024

FIGURE 4.1-3

Vantage Point 2: River Trail Location #2

Palisades Santee Commerce Center Project

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Existing view from southbound Northcote Road at Woodside Avenue towards the Project site (building site located 0.15 mile away)



Visual Simulation of Proposed Project (east and south (partial) facades of the building visible)

SOURCE: Clusters Creative 2024

FIGURE 4.1-4

Vantage Point 3: Northcote Road

Palisades Santee Commerce Center Project

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View from Sandy Crek Drive towards Rattlesnake Mountain; the drive-in theatre screen in the northwest corner of the Project site is visible but blocked by intervening trees

SOURCE: Google Earth 2022

FIGURE 4.1-5

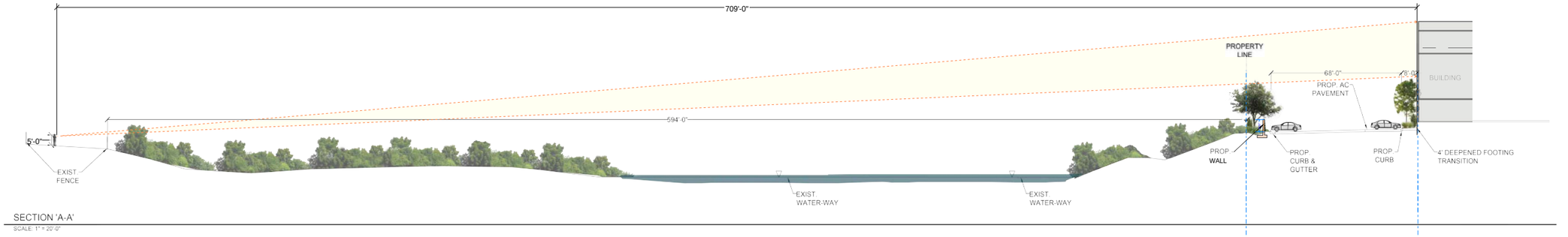
Example View towards Rattlesnake Mountain from Sandy Creek Drive

Palisades Santee Commerce Center Project

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Path: Z:\Projects\15138010\MAP\DOCS\DOCUMENT\Visual

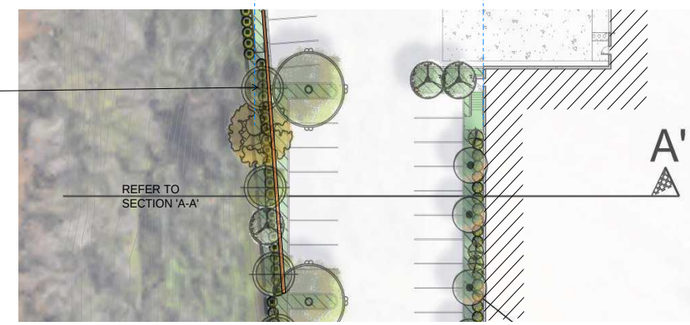
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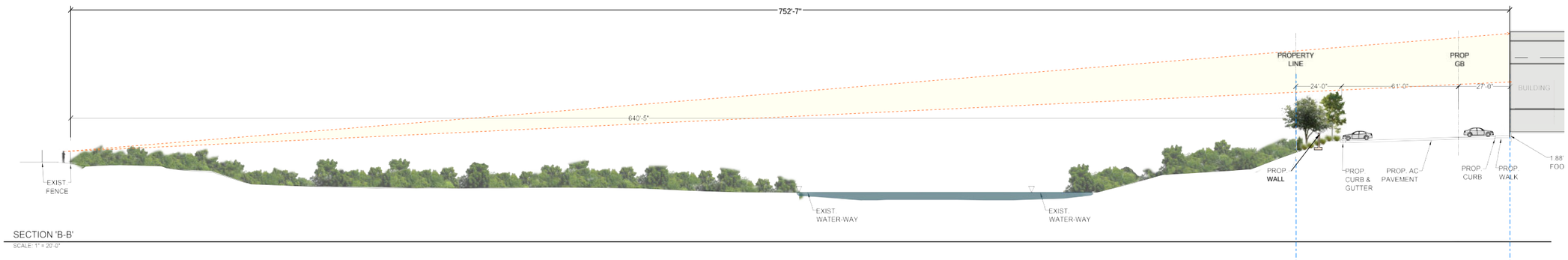


SECTION 'A-A'

SCALE: 1" = 20'-0"

FINAL LOCATION OF SCREEN TREES SHALL BE COORDIANTED TO AVOID ANY POTENTIAL CONFLICTS WITH WALL FOOTING, TYP.

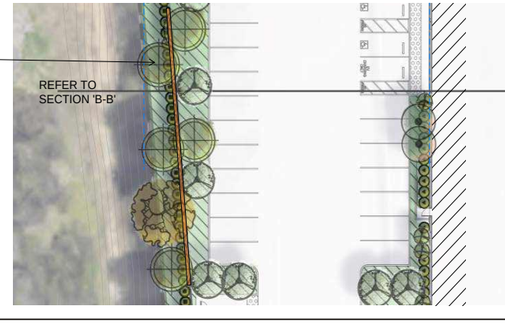




SECTION 'B-B'

SCALE: 1" = 20'-0"

FINAL LOCATION OF SCREEN TREES SHALL BE COORDIANTED TO AVOID ANY POTENTIAL CONFLICTS WITH WALL FOOTING, TYP.



SOURCE: Rodarte Landscape Architecture, Inc. 2024

FIGURE 4.1-6

Landscape Sections and River Trail View Corridors

Palisades Santee Commerce Center Project

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C. In non-urbanized areas, would the Project 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 points). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

Less-than-Significant Impact. Section 20171 of the California Public Resources Code defines an "urbanized area" as "(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (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." As of January 1, 2023, the California Department of Finance estimated the population of Santee to be 59,227 persons (DOF 2023). Additionally, the City of Santee is located adjacent to the City of El Cajon, which the California Department of Finance estimates to have a population of 104,619 as of January 1, 2023 (DOF 2023). Therefore, because the City of Santee shares a border with the City of El Cajon, and because the two cities' combined population exceeds 100,000 persons, the City of Santee is considered an urbanized area per CEQA, and the first question of this threshold does not apply to the Project, as it is directed at non-urbanized areas. Section 21071 of the California Public Resources Code also defines an urbanized area for unincorporated areas; however, the City of Santee is an incorporated city, so this definition was not considered for this analysis.

The City's Municipal Code includes design standards related to building height, setbacks, landscaping requirements, and other development considerations that are relevant to scenic quality. Specifically, Chapter 13, Zoning, of the City's Municipal Code includes design standards for each zoning district, including the Light Industrial zone, which is the zoning designation for the Project site. The Light Industrial Zone has specified regulations that are outlined in Section 13.14 of the Santee Municipal Code (City of Santee 2023b). The design standards exist, in part, to regulate the uses of buildings and structures, and to encourage the most appropriate use of land. As a part of the City's development and design review process, City staff reviews project plans to ensure compliance with applicable provisions of the Santee Municipal Code, including those provisions relating to scenic quality. Because the Project would undergo review by City Staff and with the approval of the proposed conditional use permit the proposed warehouse building's maximum height of 50 feet would be allowable within the Light Industrial zone (Section 13.14.040 of the Santee Municipal Code). The Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts associated with scenic quality would be **less than significant**.

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

Less-than-Significant Impact. Lighting is of most concern when it may potentially spill over or trespass onto off-site properties, particularly residential buildings, sensitive biological areas such as the San Diego River corridor and the public right-of-way. Light spillover, trespass, and potential glare from project lighting are regulated by Section 13.30.030(B) of the Santee Municipal Code. The code requires that all lights and illuminated signs must be designed and adjusted to reflect light away from any road or street, away from any adjoining premises, and shall be shielded or directed to not cause glare on adjacent properties or motorists.

Project construction would be limited to the City's allowable construction hours of 7:00 a.m. and 7:00 p.m. and is not anticipated to require night lighting. In the event that construction lighting is required, its use would be temporary and infrequent and the limited lighting sources in use would be properly shielded to avoid spillover effects.

According to the Site Photometric Plan prepared for the Project (Herdman Architecture + Design 2024), wall mounted light fixtures (53 in total) would be installed on the exterior façades of the building. Approximately half of the wall fixtures would be mounted at a height of 25 feet above ground surface and the remaining half would be mounted at a height of 9 feet above ground surface. In addition, approximately 18 pole mounted lights would be installed throughout the site parking lot and the site driveway. The mounting height of pole lights would be 25 feet above ground surface. All lighting fixtures would be hooded and downward casting. Fixture housing would feature a cast black painted metal finish. Lamp/light sources would be white, LEDs.

Project lighting has been designed consistent with the requirements of Section 13.30.030(B) of the Santee Municipal Code. Specifically, exterior lighting on the Project site would result in the adequate lighting of parking areas, would cast light downward where most lighting would fall onto the site (offsite light trespass would be minimal). As shown on the Site Photometric Study, all measurable lighting (i.e., 0.1-foot candles or greater) would generally be contained within the site boundary. Along the site's northern boundary with the San Diego River floodway, most measurable lighting would be contained onsite with limited occurrences of lighting (0.1-0.4 footcandles) extending north of the site's northwestern corner (light levels in this area would be reduced to 0.0-foot candles approximately 20 feet north of the project boundary). Measurable lighting (0.1-0.5 footcandles with limited occurrences of 0.7 -0.9 footcandles immediately adjacent to the site) from onsite sources would fall onto adjacent industrial and business park uses including surface parking areas to the east and west of the Project site. However, as these uses/areas are not considered light sensitive and feature similar wall and pole mounted light sources, site lighting would not adversely affect nighttime views from these properties. Similarly, site lighting would not adversely affect nighttime views available to residences located to the north of the San Diego River as measurable lighting levels would not extend to the river trail or nearby residences. Lastly, light levels extending north of the Project site would be 0.0 footcandles or low (generally, 0.1-0.3 footcandles) and would quickly reduce in intensity with increased distance from the source and Project site.

With respect to glare potentially generated by the Project, the majority of the exterior building surfaces would consist of painted concrete (i.e., tilt-up concrete walls). To provide architectural interest and break up the overall massing of the proposed building, the design includes occasional strips of vertical windows along building exteriors and a collection of windows at building corners including at the office in the southeast corner of the building. See Figure 3-12a that depicts a rendering of the office exterior and vertical window strips along the south and east building facades. Figure 3-8 presents building elevations and demonstrates limited windows along the river-facing exterior (north elevation) of the building. As stated above, painted concrete would comprise the majority of the building exterior character and at window areas, the Project would use glass that is clear or tinted with medium to high performance anti-glare glazing. Solar panels would be installed atop the building; however, the fixed-tilt panel system would be oriented toward the south and is designed to absorb (as opposed to reflect) the majority of incoming light. The panels would be visible from some hillside residential areas to the south including near Rattlesnake Mountain; however, project-related glare visible from the residential areas is anticipated to be minimal due to distance, the general small size of the solar array system, and the orientation of the panels towards the sky.

As such, the Project would not result in a substantial amount of glare in the Project area. Therefore, impacts associated with light and glare would be **less than significant**.

4.1.5 Mitigation Measures and Level of Significance After Mitigation

All impacts related to aesthetics would be less than significant. No mitigation is required.

4.2 Air Quality

This section describes the existing air quality conditions of the Palisade Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential air quality impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to implementation of the Project.

In addition to the documents incorporated by reference (see Section 2.7 of Chapter 2 of this environmental impact report [EIR]), the following analysis is based, in part, on the following sources:

- *Air Quality and GHG Emissions Technical Report*, prepared by Dudek in March 2025 (Appendix B).
- *Transportation Impact Study,* prepared by Dudek in March 2025 (Appendix L)

4.2.1 Existing Conditions

Meteorological and Topographical Conditions

The weather of the San Diego region, as in most of Southern California, is influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average temperature ranges (in degrees Fahrenheit) from the mid-40s to the high 90s. Most of the region's precipitation falls from November to April, with infrequent (approximately 10%) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches; the amount increases with elevation as moist air is lifted over the mountains (WRCC 2016). This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds.

The topography in the San Diego region varies greatly, from beaches on the west to mountains and desert on the east; along with local meteorology, it influences the dispersal and movement of pollutants in the basin. The mountains to the east prohibit dispersal of pollutants in that direction and help trap them in inversion layers.

The interaction of ocean, land, and the Pacific High Pressure Zone maintains clear skies for much of the year and influences the direction of prevailing winds (westerly to northwesterly). Local terrain is often the dominant factor inland, and winds in inland mountainous areas tend to blow through the valleys during the day and down the hills and valleys at night.

Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O_3, NO_2, CO, sulfur dioxide (SO_2), PM_{10}, $PM_{2.5}$, and lead. These pollutants

are discussed in the following paragraphs.[1] In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

Ozone (O_3). O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O_3 precursors. These precursors are mainly NO_x and VOCs. The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O_3 exists in the upper atmosphere O_3 layer (stratospheric O_3) and at the Earth's surface in the troposphere.[2] The O_3 that the U.S. Environmental Protection Agency (EPA) and the CARB regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O_3 is a harmful air pollutant that causes numerous adverse health effects and is thus considered "bad" O_3. Stratospheric, or "good," O_3 occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere. Without the protection of the beneficial stratospheric O_3 layer, plant and animal life would be seriously harmed.

O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2013). These health problems are particularly acute in sensitive receptors such as the sick, the elderly, and young children.

Nitrogen Dioxide (NO_2). NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide (NO), which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections (EPA 2016).

Carbon Monoxide (CO). CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the Project location, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

1 The following descriptions of health effects for each of the criteria air pollutants associated with project construction and operations are based on the U.S. Environmental Protection Agency's "Six Common Air Pollutants" (EPA 2023a) and the California Air Resources Board's "Glossary of Air Pollutant Terms" (CARB 2017) published information.

2 The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward about 5 miles at the poles and about 10 miles at the equator.

In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions.

Sulfur Dioxide (SO_2). SO_2 is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels.

SO_2 is an irritant gas that attacks the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. When combined with particulate matter, SO_2 can injure lung tissue and reduce visibility and the level of sunlight. SO_2 can also yellow plant leaves and erode iron and steel.

Particulate Matter (PM). Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter (PM_{10}) consists of particulate matter that is 10 microns or less in diameter and is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter ($PM_{2.5}$) consists of particulate matter that is 2.5 microns or less in diameter and is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also damage and discolor surfaces on which they settle and produce haze and reduce regional visibility.

People with influenza, people with chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death as a result of breathing particulate matter. People with bronchitis can expect aggravated symptoms from breathing in particulate matter. Children may experience a decline in lung function due to breathing in PM_{10} and $PM_{2.5}$ (EPA 2009).

Lead. Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline,

secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including IQ performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead.

Volatile Organic Compounds (VOCs). Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O_3 are referred to and regulated as Volatile Organic Compounds (VOCs) (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry-cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs.

Non-Criteria Air Pollutants

Toxic Air Contaminants (TACs). A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and state agencies based on a review of available scientific evidence. In the State of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources such as automobiles; and area sources such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter (DPM). DPM is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and thus is a subset of $PM_{2.5}$ (CARB 2022b). DPM is typically composed of carbon particles ("soot," also called black carbon) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene (CARB

2022b). CARB classified "particulate emissions from diesel-fueled engines" (i.e., DPM) as a TAC in August 1998 (17 CCR 93000). DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000 (CARB 2000). Because it is part of $PM_{2.5}$, DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies (CARB 2022b). Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

Odorous Compounds. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. In a phenomenon known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

Valley Fever. Coccidioidomycosis, more commonly known as "Valley Fever," is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus, which grows in the soils of the southwestern United States. The ecologic factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline, sandy soils.

The County is not considered a highly endemic region for Valley Fever, as the latest report from the County of San Diego Health and Human Services Agency Public Health Services indicated the County has 8.3 cases per 100,000 people (County of San Diego 2019). In the zip code area of the Project site, the case rate is reported as between 5.0-7.6 cases per 100,000 people (County of San Diego 2021).

Sensitive Receptors

Air quality varies as a direct function of the quantity of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion.

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by the California Air Resources Board (CARB), include children, older adults, and people with cardiovascular and chronic respiratory diseases. According to the SDAPCD, sensitive receptors are those who are especially susceptible to adverse health effects from exposure to toxic air contaminants, such as children, the elderly, and the ill. Sensitive receptors include residences, schools (grades Kindergarten through 12), libraries, day care centers, nursing homes, retirement homes, health clinics, and hospitals within 2 kilometers of a project site (SDAPCD 2022a). The closest sensitive receptors to the Project site are single-family residences to the north of the site and north of the San Diego River and single and multifamily residential units south of the Project site and south of Highway 67.

Local Ambient Air Quality

The Project area is located within the San Diego Air Basin (SDAB) and is subject to the SDAPCD guidelines and regulations. The SDAB is one of 15 air basins that geographically divide the State of California. The SDAB is currently classified as a federal nonattainment area for ozone (O_3) and a state nonattainment area for particulate matter less than 10 microns (PM_{10}), particulate matter less than 2.5 microns ($PM_{2.5}$), and O_3.

The SDAB experiences frequent temperature inversions. Subsidence inversions occur during the warmer months as descending air associated with the Pacific High Pressure Zone meets cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. The other type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm. The shallow inversion layer formed between these two air masses also can trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce O_3, which contributes to the formation of smog. Smog is a combination of smoke and other particulates, O_3, hydrocarbons, oxides of nitrogen (NO_x) and other chemically reactive compounds which, under certain conditions of weather and sunlight, may result in a murky brown haze that causes adverse health effects (CARB 2022a).

Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to carbon monoxide (CO) and NO_x emissions. CO concentrations are generally higher in the morning and late evening. In the morning, CO levels are elevated due to cold temperatures and the large number of motor vehicles traveling. Higher CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the SDAB are associated with heavy traffic. Nitrogen dioxide (NO_2) levels are also generally higher during fall and winter days.

Under certain conditions, atmospheric oscillation results in the offshore transport of air from the Los Angeles region to San Diego County. This often produces high O_3 concentrations, as measured at air pollutant monitoring stations within San Diego County. The transport of air pollutants from Los Angeles to San Diego has also occurred within the stable layer of the elevated subsidence inversion, where high levels of O_3 are transported.

SDAB Attainment Designation

Pursuant to the 1990 CAA Amendments, EPA classifies air basins (or portions thereof) as “attainment” or “nonattainment” for each criteria air pollutant, based on whether the NAAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as “attainment” for that pollutant. If an area exceeds the standard, the area is classified as “nonattainment” for that pollutant. As previously discussed, these standards are set by EPA or CARB for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as “unclassified” or “unclassifiable.”

The designation of “unclassifiable/attainment” means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are redesignated as maintenance areas and must have approved maintenance plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as “attainment” or “nonattainment,” but based on the CAAQS rather than the NAAQS.

Table 4.2-1 summarizes SDAB’s federal and state attainment designations for each of the criteria pollutants.

Table 4.2-1. SDAB Attainment Designation

Pollutant	Federal Designation	State Designation
O_3 (8-hour)	**Nonattainment**	**Nonattainment**
O_3 (1-hour)	Attainment[a]	**Nonattainment**
CO	Attainment	Attainment
PM_{10}	Unclassifiable[b]	**Nonattainment**
$PM_{2.5}$	Attainment	**Nonattainment**[c]
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen sulfide	(No federal standard)	Unclassified
Visibility-reducing particles	(No federal standard)	Unclassified
Vinyl chloride	(No federal standard)	No designation

Sources: SDAPCD 2022b
Definitions: attainment = meets the standards; nonattainment = does not meet the standards; unclassified or unclassifiable = insufficient data to classify
Notes: SDAB = San Diego; O_3 = ozone; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide.

[a] The federal 1-hour standard of 0.12 parts per million (ppm) was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in SIPs.

[b] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

[c] CARB has not reclassified the region to attainment yet due to (1) incomplete data, and (2) the use of non-California Approved Samplers (CAS). While data collected does meet the requirements for designation of attainment with federal $PM_{2.5}$ standards, the data completeness requirements for state $PM_{2.5}$ standards substantially exceed federal requirements and mandates, and have historically not been feasible for most air districts to adhere to given local resources. APCD has begun replacing most regional filter-based $PM_{2.5}$ monitors as they reach the end of their useful life with continuous $PM_{2.5}$ air monitors to ensure collected data meets stringent completeness requirements in the future. APCD anticipates these new monitors will be approved as "CAS" monitors once CARB review the list of approved monitors, which has not been updated since 2013.

Air Quality Monitoring Data

CARB, air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. Local ambient air quality is monitored by SDAPCD. SDAPCD operates a network of ambient air monitoring stations throughout the County that measure ambient concentrations of pollutants and determine whether the ambient air quality meets the CAAQS and the NAAQS. The nearest SDAPCD-operated monitoring station is the El Cajon monitoring station located at 533 First Street, El Cajon. This site was used to show the background ambient air quality for Ozone, NO_2 CO, SO_2, PM_{10}, and $PM_{2.5}$. The most recent background ambient air quality data and number of days exceeding the ambient air quality standards from 2020 to 2022 are presented in Table 4.2-2.

Table 4.2-2. Local Ambient Air Quality Data

Averaging Time	Unit	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
				2020	2021	2022	2020	2021	2022
Ozone (O_3) – El Cajon – First Street; Floyd Smith Drive									
Maximum 1-hour concentration	ppm	State	0.09	0.094	0.088	0.100	0	0	1

Table 4.2-2. Local Ambient Air Quality Data

Averaging Time	Unit	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
				2020	2021	2022	2020	2021	2022
Maximum 8-hour concentration	ppm	State	0.070	0.083	0.077	0.088	14	3	2
		Federal	0.070	0.083	0.076	0.088	14	3	2
Nitrogen Dioxide (NO2) – El Cajon – First Street; Floyd Smith Drive									
Maximum 1-hour concentration	ppm	State	0.18	0.044	0.038	0.037	0	0	0
		Federal	0.100	0.044	0.038	0.037	0	0	0
Annual concentration	ppm	State	0.030	0.008	0.006	0.008	—	—	--
		Federal	0.053	0.008	0.006	0.008	—	—	--
Carbon Monoxide (CO) – El Cajon – First Street; Floyd Smith Drive									
Maximum 1-hour concentration	ppm	State	20	1.5	1.2	1.4	0	0	0
		Federal	35	1.5	1.2	1.4	0	0	0
Maximum 8-hour concentration	ppm	State	9.0	1.4	1.1	1.1	0	0	0
		Federal	9	1.4	1.1	1.1	0	0	0
Sulfur Dioxide (SO2) – El Cajon – First Street; Floyd Smith Drive									
Maximum 1-hour concentration	ppm	Federal	0.075	0.0017	0.0016	0.0008	0	0	0
Maximum 24-hour concentration	ppm	Federal	0.14	0.0004	0.0003	0.003	0	0	0
Annual concentration	ppm	Federal	0.030	0.00009	0.00006	0.00006	0	0	0
Coarse Particulate Matter (PM10)a – El Cajon – First Street; Floyd Smith Drive									
Maximum 24-hour concentration	µg/m³	State	50	55	40	44	0.0 (0)	0.0 (0)	0.0 (0)
		Federal	150	55	40	44	0.0 (0)	0.0 (0)	0.0 (0)
Annual concentration	µg/m³	State	20	23 **	23 **	*	—	—	—
Fine Particulate Matter ($PM_{2.5}$)[a] – El Cajon – First Street; Floyd Smith Drive									
Maximum 24-hour concentration	µg/m³	Federal	35	38.2	30.2	26.4	2.2	0	0
Annual concentration	µg/m³	State	12	11.5	10.3	*	0.0 (0)	0.0 (0)	*
		Federal	12.0	10.3	9.7	9.4	0.0 (0)	0.0 (0)	0.0 (0)

Sources: CARB 2023; EPA 2023.

Notes: ppm = parts per million; — = not available; µg/m³ = micrograms per cubic meter

Data taken from CARB iADAM (CARB 2022c) and EPA AirData (EPA 2022) represent the highest concentrations experienced over a given year.

Daily exceedances for particulate matter are estimated days because PM_{10} and $PM_{2.5}$ are not monitored daily. All other criteria pollutants did not exceed federal or state standards during the years shown. There is no federal standard for 1-hour O_3, annual PM_{10}, or 24-hour SO_2, nor is there a state 24-hour standard for $PM_{2.5}$.
Camp Pendleton monitoring station is located at 21441 West B Street, Camp Pendleton, California.
El Cajon – First Street monitoring station is located at 533 First Street, El Cajon, California.
El Cajon – Floyd Smith Drive monitoring station is located at 10537 Floyd Smith Drive, El Cajon, California.
[a] Measurements of PM_{10} and $PM_{2.5}$ are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored. The numbers in parentheses are the measured number of samples that exceeded the standard.
* There was insufficient (or no) data available to determine the value.
** Most recent data for PM10 at monitor location for annual are years 2017 and 2018.

4.2.2 Relevant Plans, Policies, and Ordinances

Federal

Criteria Air Pollutants

The federal Clean Air Act (CAA), passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The United States Environmental Protection Agency (EPA) is responsible for implementing most aspects of the CAA, including the setting of National Ambient Air Quality Standards (NAAQS) for major air pollutants, hazardous air pollutant (HAP) standards, approval of state attainment plans, motor vehicle emission standards, stationary source emission standards and permits, acid rain control measures, stratospheric O_3 protection, and enforcement provisions.

NAAQS are established by the EPA for "criteria pollutants" under the CAA, which are O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The CAA requires the EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a state implementation plan (SIP) that demonstrates how those areas will attain the standards within mandated time frames.

Hazardous Air Pollutants

The 1977 CAA Amendments required the EPA to identify national emission standards for hazardous air pollutants to protect the public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 CAA Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

State

Criteria Pollutants

The California Clean Air Act was adopted in 1988 and establishes the state's air quality goals, planning mechanisms, regulatory strategies, and standards of progress. Under the California Clean Air Act, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB is responsible for ensuring implementation of the California Clean Air Act, responding to the CAA, and regulating

emissions from motor vehicles and consumer products. Pursuant to the authority granted to it, CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS.

The NAAQS and CAAQS are presented in Table 4.2-3.

Table 4.2-3. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
O_3	1 hour	0.09 ppm (180 µg/m³)	—	Same as primary standard[f]
	8 hours	0.070 ppm (137 µg/m³)	0.070 ppm (137 µg/m³)[f]	
NO_2[g]	1 hour	0.18 ppm (339 µg/m³)	0.100 ppm (188 µg/m³)	Same as primary standard
	Annual arithmetic mean	0.030 ppm (57 µg/m³)	0.053 ppm (100 µg/m³)	
CO	1 hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	None
	8 hours	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	
SO_2[h]	1 hour	0.25 ppm (655 µg/m³)	0.075 ppm (196 µg/m³)	—
	3 hours	—	—	0.5 ppm (1,300 µg/m³)
	24 hours	0.04 ppm (105 µg/m³)	0.14 ppm (for certain areas)[g]	—
	Annual	—	0.030 ppm (for certain areas)[g]	—
PM_{10}[i]	24 hours	50 µg/m³	150 µg/m³	Same as primary standard
	Annual arithmetic mean	20 µg/m³	—	
$PM_{2.5}$[i]	24 hours	—	35 µg/m³	Same as primary standard
	Annual arithmetic mean	12 µg/m³	12.0 µg/m³	15.0 µg/m³
Lead[j, k]	30-day average	1.5 µg/m³	—	—
	Calendar quarter	—	1.5 µg/m³ (for certain areas)[k]	Same as primary standard
	Rolling 3-month average	—	0.15 µg/m³	
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m³)	—	—
Vinyl chloride[j]	24 hours	0.01 ppm (26 µg/m³)	—	—
Sulfates	24- hours	25 µg/m³	—	—

Table 4.2-3. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
Visibility reducing particles	8 hour (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70%	—	—

Source: CARB 2016.

Notes: O_3 = ozone; ppm = parts per million by volume; μg/m³ = micrograms per cubic meter; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m³= milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns.

[a] California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter (PM_{10}, $PM_{2.5}$), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m³ is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25°Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[e] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[g] To attain the national 1-hour standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[h] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[i] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 μg/m³ to 12.0 μg/m³. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 μg/m³, as was the annual secondary standard of 15 μg/m³. The existing 24-hour PM_{10} standards (primary and secondary) of 150 μg/m³ were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.

[j] CARB has identified lead and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[k] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 μg/m³ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Sulfates. Salts of sulfuric acid. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere and can result in respiratory impairment, as well as reduced visibility. Sulfates occur as microscopic particles (aerosols) resulting from fossil fuel and biomass combustion. They increase the acidity of the atmosphere and form acid rain.

Vinyl Chloride. Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide. Hydrogen sulfide is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of hydrogen sulfide include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to hydrogen sulfide can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Visibility-Reducing Particles. Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for $PM_{2.5}$.

Toxic Air Contaminants

The state Air Toxics Program was established in 1983 under AB 1807 (Tanner). The California TAC list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs. The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) seeks to identify and evaluate risk from air toxics sources; however, AB 2588 does not regulate air toxics emissions. TAC emissions from individual facilities are quantified and prioritized. "High-priority" facilities are required to perform a health risk assessment (HRA), and if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. The regulation was anticipated to result in an 80% decrease in statewide diesel health risk in 2020 compared with the diesel risk in 2000. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment program. All of these regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel powered equipment. Several Airborne Toxic Control Measures that reduce diesel emissions including In-Use Off-Road Diesel-Fueled Fleets (13 CCR § 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR § 2025).

California Health and Safety Code Section 41700

This section of the Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

Local

San Diego Air Pollution Control District

While CARB is responsible for the regulation of mobile emission sources within the state, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The Project site is located within the SDAB and is subject to the guidelines and regulations of SDAPCD.

In San Diego County, O_3 and particulate matter are the pollutants of main concern since exceedances of CAAQS for those pollutants are experienced here in most years. For this reason, the SDAB has been designated as a nonattainment area for the state PM_{10}, $PM_{2.5}$, and O_3 standards. The SDAB is also a federal O_3 attainment (maintenance) area for 1997 8-hour O_3 standard, a O_3 nonattainment area for the 2008 8-hour O_3 standard, and a CO maintenance area (western and central part of the SDAB only). The Project area is in the CO maintenance area.

San Diego Association of Governments

The San Diego Association of Governments (SANDAG) is the regional planning agency for the County and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SANDAG serves as the federally designated metropolitan planning organization for the County. With respect to air quality planning and other regional issues, SANDAG has prepared San Diego Forward: The Regional Plan (Regional Plan) for the San Diego region (SANDAG 2015). The Regional Plan combines the big-picture vision for how the San Diego region will grow over the next 35 years with an implementation program to help make that vision a reality. The Regional Plan, which includes the Federally mandated Regional Transportation Plan (RTP) and state required Sustainable Communities Strategy (SCS), is built on an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system so that it meets the diverse needs of the San Diego region through 2050.

With respect to air quality, the Regional Plan sets the policy context in which SANDAG participates and responds to the SDAPCD ’s air quality plans and builds on plan processes that are designed to meet health-based criteria pollutant standards in several ways (SANDAG 2015). First, it complements air quality plans by providing guidance and incentives for public agencies to consider best practices that support the technology-based control measures in air quality plans. Second, the Regional Plan emphasizes the need for better coordination of land use and transportation planning, which heavily influence the emissions inventory from the transportation sectors of the economy. This also minimizes land use conflicts, such as residential development near freeways, industrial areas, or other sources of air pollution.

On February 26, 2021, SANDAG’s Board of Directors adopted the final 2021 Regional Transportation Improvement Program (RTIP). The 2021 RTIP covers 5 fiscal years (FY 2021 through FY 2025) and incrementally implements the SANDAG 2019 Federal Regional Transportation Plan. The 2021 RTIP is designed to implement the region’s overall strategy for providing mobility and improving the safety, condition, and efficiency of the transportation system while reducing transportation related air pollution. The 2021 RTIP incrementally implements San Diego Forward: The 2019 Federal Regional Transportation Plan, the long-range transportation plan for the San Diego region approved by the SANDAG Board of Directors on October 25, 2019.

Federal Attainment Plans

In December 2016, the SDAPCD adopted an update to the Eight-Hour Ozone Attainment Plan for San Diego County (2008 O_3 NAAQS). The 2016 Final Eight-Hour Ozone Attainment Plan for San Diego County indicates that local controls and state programs would allow the region to reach attainment of the federal 8-hour O_3 standard (1997 O_3 NAAQS) by 2018 (SDAPCD 2016b). In this plan, SDAPCD relies on the Regional Air Quality Strategy (RAQS) to demonstrate how the region will comply with the federal O_3 standard. The RAQS details how the region will manage and reduce O_3 precursors (NO_x and VOCs) by identifying measures and regulations intended to reduce these pollutants. The control measures identified in the RAQS generally focus on stationary sources; however, the emissions inventories and projections in the RAQS address all potential sources, including those under the authority of CARB and EPA. Incentive programs for reduction of emissions from heavy-duty diesel vehicles, off-road equipment, and school buses are also established in the RAQS.

Currently, the County is designated as moderate nonattainment for the 2008 O_3 NAAQS and maintenance for the 1997 O_3 NAAQS. As documented in the 2016 Final Eight-Hour Ozone Attainment Plan for San Diego County, the County has a likely chance of obtaining attainment due to the transition to low emission cars, stricter new source review rules, and continuing the requirement of general conformity for military growth and the San Diego International Airport. SDAPCD will also continue emission control measures including ongoing implementation of existing regulations in ozone precursor reduction to stationary and area-wide sources, subsequent inspections of facilities and sources, and the adoption of laws requiring Best Available Retrofit Control Technology for control of emissions (SDAPCD 2016b).

State Attainment Plans

The SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The RAQS for the SDAB was initially adopted in 1991 and is updated on a triennial basis, most recently in 2020 (SDAPCD 2020). Approved by the District Board on October 14, 2020, and the California Air Resources Board on November 19, 2020, the plan was submitted by CARB on January 8, 2021 for EPA's consideration as a revision to the California State Implementation Plan (SIP) for attaining the ozone standards. The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for O_3. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County and the cities in the County, to forecast future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans (SANDAG 2017a, 2017b).

In January 2021, CARB submitted for EPA's consideration the revised California SIP. On July 12, 2021, the San Diego 2020 SIP was found complete by EPA. Under the Clean Air Act, the EPA has twelve months from the completeness date to take a final action on the 2020 SIP. As discussed in the 2020 RAQS, the results of modeling and Weight of Evidence analyses provide persuasive support to a conclusion that the emission control measures defined in the plan are sufficient to continue reducing ozone concentrations throughout San Diego County to the level of the 2008 ozone NAAQS by the conclusion of the 2026 ozone season, and to the level of the 2015 ozone NAAQS by the conclusion of the 2032 ozone season.

In regard to particulate matter emissions-reduction efforts, in December 2005, the SDAPCD prepared a report titled "Measures to Reduce Particulate Matter in San Diego County" to address implementation of Senate Bill (SB) 656

in the County (SB 656 required additional controls to reduce ambient concentrations of PM_{10} and $PM_{2.5}$) (SDAPCD 2005). In the report, SDAPCD evaluated implementation of source-control measures that would reduce particulate matter emissions associated with residential wood combustion; various construction activities including earthmoving, demolition, and grading; bulk material storage and handling; carry-out and track-out removal and cleanup methods; inactive disturbed land; disturbed open areas; unpaved parking lots/staging areas; unpaved roads; and windblown dust (SDAPCD 2005).

SDAPCD Rules and Regulations

As stated previously, SDAPCD is responsible for planning, implementing, and enforcing federal and state ambient standards in the SDAB. The following rules and regulations apply to all sources in the jurisdiction of SDAPCD:

- **SDAPCD Regulation IV: Prohibitions; Rule 50: Visible Emissions.** Prohibits any activity causing air contaminant emissions darker than 20% opacity for more than an aggregate of 3 minutes in any consecutive 60-minute time period. In addition, Rule 50 prohibits any diesel pile-driving hammer activity causing air contaminant emissions for a period or periods aggregating more than 4 minutes during the driving of a single pile (SDAPCD 1997).
- **SDAPCD Regulation IV: Prohibitions; Rule 51: Nuisance.** Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property (SDAPCD 1976).
- **SDAPCD Regulation IV: Prohibitions; Rule 55: Fugitive Dust.** Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site (SDAPCD 2009b).
- **SDAPCD Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings.** Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2015).

Santee General Plan

The City of Santee General Plan serves as a long-term policy guide for physical, economic, and environmental growth. It is a statement of the community's vision for ultimate growth. State law requires that every city prepare and adopt a comprehensive long-range plan to serve as a guide for the development of the community. City actions, such as those relating to land use allocations, annexations, zoning, subdivision and design review, redevelopment and capital improvements must be consistent with the General Plan. Applicable General Plan objectives and policies related to improving air quality include the following:

Mobility Element

Streets and Freeway System Objective 2.0 Transportation network, consisting of local roads, collectors, arterials, freeways and transit services, in a manner that promotes the health and mobility of Santee residents and that meets future circulation needs, provides access to all sectors of the City, and supports established and planned land uses.

Policy 2.9 The City should work with the region to develop traffic and congestion management programs to improve commute times and improve air quality.

Transportation Demand Management Objective 9.0 Increased use of alternative modes of travel to reduce peak hour vehicular trips, save energy, and improve air quality.

Policy 9.1 The City shall encourage and provide for Ride Sharing, Park 'n Ride, and other similar commuter programs that eliminate vehicles from freeways and arterials.

Policy 9.2 The City should encourage businesses to provide flexible work schedules for employees.

Policy 9.3 The City should encourage employers to offer shared commute programs and/or incentives for employees to use transit.

Policy 9.4 The City should encourage the use of alternative transportation modes, such as walking, cycling and public transit. The City should maintain and implement the policies and recommendations of the Bicycle Master Plan and Safe Routes to School Plan to improve safe bicycle and pedestrian access to major destinations.

Policy 9.5 The City should improve safety of walking and biking environment around schools to reduce school-related vehicle trips.

City of Santee Active Santee Plan, January 2021

Objective 8.0 Increased use of alternative modes of travel to schools to reduce peak hour vehicular trips, save energy, and improve air quality around schools.

Sustainable Santee Plan

The City adopted the Sustainable Santee Plan in December of 2019 (City of Santee 2019). The Sustainable Santee Plan serves as the City's climate action plan (CAP) with the primary purpose or goals as follows:

1. Present the City's plan for achieving sustainability by utilizing resources efficiently, reducing greenhouse gas emissions, and preparing for potential climate-related impacts.
2. Identify how the City will effectively implement this Sustainable Santee Plan by obtaining funding for program implementation and tracking and monitoring the progress of the Plan implementation over time.
3. Allow streamlined CEQA compliance for new development by preparing an Environmental Impact Report for the Plan and developing tools that provide clear guidance to developers and other project proponents
4. Maintain economic competitiveness within the region.

The Sustainable Santee Action Plan Project Consistency Checklist (Checklist) is intended to be a tool for development projects to demonstrate consistency with Santee's (City's) Sustainable Santee Action Plan, which is a qualified greenhouse gas (GHG) emissions reduction plan in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15183.5. This Checklist has been developed as part of the Sustainable Santee Action 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.

4.2.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to air quality are based on CEQA Guidelines Appendix G. According to CEQA Guidelines Appendix G, a significant impact related to air quality would occur if the Project would:

A. Conflict with or obstruct implementation of the applicable air quality plan.
B. Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard.
C. Expose sensitive receptors to substantial pollutant concentrations.
D. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

As part of its air quality permitting process, the SDAPCD has established thresholds in Rule 20.2 requiring the preparation of Air Quality Impact Assessments for permitted stationary sources. The SDAPCD sets forth quantitative emission thresholds below which a stationary source would not have a significant impact on ambient air quality. Project-related air quality impacts estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds presented in Table 4.2-4 are exceeded.

For CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that the Project's total emissions would or would not result in a significant impact to air quality.

Table 4.2-4. SDAPCD Air Quality Significance Thresholds

Construction Emissions			
Pollutant	**Total Emissions (Pounds per Day)**		
Coarse particulate matter (PM_{10})	100		
Fine particulate matter ($PM_{2.5}$)	55		
Oxides of nitrogen (NO_x)	250		
Sulfur oxides (SO_x)	250		
Carbon monoxide (CO)	550		
Volatile organic compounds (VOCs)	75*		
Operational Emissions			
	Total Emissions		
Pollutant	**Pounds per Hour**	**Pounds per Day**	**Tons per Year**
Coarse particulate matter (PM_{10})	—	100	15
Fine particulate matter ($PM_{2.5}$)	—	55	10
Oxides of nitrogen (NO_x)	25	250	40
Sulfur oxides (SO_x)	25	250	40
Carbon monoxide (CO)	100	550	100
Lead and lead compounds	—	3.2	0.6
Volatile organic compounds (VOCs)	—	75*	13.7

Source: SDAPCD 2016a.

Notes: SDAPCD = San Diego Air Pollution Control District.
* VOC threshold based on the threshold of significance for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley as stated in the San Diego County Guidelines for Determining Significance.

The thresholds listed in Table 4.2-4 represent screening-level thresholds that can be used to evaluate whether Project-related emissions would cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact. In the event that emissions exceed these thresholds, modeling would be required to demonstrate that the Project's total air quality impacts result in ground-level concentrations that are below the CAAQS and NAAQS, including appropriate background levels. For non-attainment pollutants, if emissions exceed the thresholds shown in Table 4.2-4, the Project could have the potential to result in a cumulatively considerable net increase in these pollutants and thus could have a significant impact on the ambient air quality.

SDAPCD Rule 51 (Public Nuisance) prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person (SDAPCD 1976). A project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors.

Methodology

Construction Emissions

Emissions from the construction phase of Project components were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.19. Per preliminary project details, it is assumed that construction of the Project would begin in June 2024[3] and would last approximately 15 months.

Table 4.2-5 provides the construction timeline, potential phasing, construction equipment mix, and vehicle trips assumed for estimating Project-generated construction emissions. The construction schedule has been developed based on available information provided by the Project applicant, typical construction practices, and CalEEMod default assumptions. Construction phasing is intended to represent a schedule of anticipated activities for use in estimating potential Project-generated construction emissions.

Table 4.2-5. Construction Scenario Assumptions

Construction Phase (Duration)	Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Demolition	16	4	184	Concrete/Industrial Saws	1	8
				Excavators	3	8
				Rubber Tired Dozers	2	8

[3] At the time this Air Quality and Greenhouse Gas modelling was initiated, the analysis assumed a construction start date of July 2023. While past, it represented the earliest date construction could have been initiated. It is assumed that the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years. Therefore, the conclusions of the analysis are more conservative than analyses prepared for later years.

Table 4.2-5. Construction Scenario Assumptions

Construction Phase (Duration)	Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
				Asphalt Crusher (Other Construction Equipment)	1	8
Grading	20	4	0	Excavators	2	8
				Graders	1	8
				Rubber Tired Dozers	1	8
				Scrapers	2	8
				Tractors/Loaders/ Backhoes	2	8
Building Construction	126	50	0	Cranes	1	7
				Forklifts	3	8
				Generator Sets	1	8
				Tractors/Loaders/ Backhoes	3	7
				Welders	1	8
Paving	16	0	0	Pavers	2	8
				Paving Equipment	2	8
				Rollers	2	8
Architectural Coating	26	0	0	Air Compressors	1	6

Note: See Appendix B of this EIR for additional details.

The equipment mix assumptions were based on CalEEMod default assumptions based on proposed land use, and is meant to represent a reasonably conservative estimate of construction activity. During the demolition phase of construction, asphalt crushing was modeled as other construction equipment for engine emissions and fugitive particulate emissions were estimated through EPA emission factors outside of CalEEMod and provide in the Appendix. For the analysis, it is generally assumed that heavy construction equipment would be operating at the site for approximately 8 hours per day, 5 days per week. Default assumptions provided in CalEEMod were used to determine worker trips and vendor truck trips for each potential construction phase. The default CalEEMod trip distance for construction vehicles was assumed, which was a one-way distance of 11.97 miles for worker trips, 7.63 miles for vendor truck trips, and 20 miles for haul truck trips.

Implementation of the Project would generate criteria air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Based on project specific information, grading materials would be balanced onsite. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. Construction of Project components would be subject to SDAPCD Rule 55 – Fugitive Dust Control. Compliance with Rule 55 would limit fugitive dust (PM_{10} and $PM_{2.5}$) that may be generated during grading and construction activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites two times per day, depending on weather conditions.

Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), haul trucks, and worker vehicles would result in emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$. The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SDAPCD Rule 67.0.1 for Architectural Coatings.

For additional details, see Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files* of Appendix B to this EIR.

Operational Emissions

Emissions from the operational phase of the Project were estimated using CalEEMod for operational year 2025.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating and water heating are calculated in the building energy use module of CalEEMod, as described in the following text.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2021). Consumer product VOC emissions were estimated in CalEEMod based on the floor area of buildings and default factor of pounds of VOC per building square foot per day. The CalEEMod default values for consumer products were assumed.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings, such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from the application of surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The VOC emissions factor is based on the VOC content of the surface coatings, and SDAPCD Rule 67.0.1, Architectural Coatings, governs the VOC content for interior and exterior coatings. CalEEMod default values were assumed, including the surface area to be painted, the VOC content of architectural coatings, and the reapplication rate of 10% of area per year.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers. The emissions associated with landscape equipment use were estimated based on CalEEMod default values for emission factors (grams per square foot of building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days.

Mobile Sources

The Project would generate criteria pollutant emissions from mobile sources (vehicular traffic) as a result of the employee passenger vehicles (workers) and truck traffic associated with the operation of the warehouse.

Emissions from the mobile sources during operation of the Project were estimated in CalEEMod. The maximum daily trip rates, taken from the Project transportation analysis, were 1,011 primary trips per day, which were assumed 7 days per week. The passenger vehicle trip lengths were assumed to be CalEEMod default trip length of 11 miles for commercial-work trips (i.e., trips made by someone who is employed by the warehouse land use) and assumed to be 100% of primary trips. The light-duty, medium-heavy-duty, and heavy-duty truck trip lengths were based on the 40 miles and assumed to be 100% of primary trips. Vehicle emissions occur during startup, operation (running), and idling, as well as from evaporative losses when the engines are resting. The emissions factors for trucks and passenger vehicles were determined using CalEEMod.

To identify an appropriate trip length assumption for heavy-duty truck trips, a project-specific EMFAC-based estimate was performed. EMFAC data and the distance to the Otay Mesa Port of Entry was examined. EMFAC data was queried for San Diego County for operational year 2025 for light-heavy duty (LHDT1 and LHDT2), medium heavy duty (MHDT), and heavy-heavy duty trucks (HHDT) for total vehicle miles traveled (VMT) and number of vehicle trips. Based on the EMFAC data it is estimated that MHDTs average 3.6 miles per trip and HHDTs average 8.21 miles per trip in San Diego County. LHDT1 and LHDT2s have a shorter EMFAC trip distance compared to MHDT. Therefore, as a conservative assumption, LHDT1 and LHDT2 were assumed to have the same trip distance as MHDTs. The estimated trip distance from the Otay Mesa Port of Entry to the Project was estimated to be 37 miles. Based on the EIR's transportation analysis, HHDT make up 62.6% of the total truck trips for the Project and LHDT1, LHDT2, and MHDTs make up 37.4% of truck trips. Conservatively assuming all HHDTs originate from the Otay Mesa Port of Entry, then 50% of HHDT truck arrival trips are assumed to be from a distance of 37 miles. The other 50% making up the HHDT departure from the Project are assumed to have trip distance equal to the average EMFAC San Diego County trip distance of 8.21 miles. To determine an average total truck distance for use in CalEEMod, HHDT trips were averaged with the other 37.4% of the trucks (and LHDT1, LHDT2, and MHDTs) to determine an overall weighted average truck trip distance equal to 32 miles. See Table 4.2-6 for calculation details.

Table 4.2-6. Operational Truck Trip Distance

Vehicle	Percent of Trucks Trips (%)[1]	EMFAC Data			Trip Distance
		EMFAC Truck Classification	County-wide VMT	County-wide Vehicle Trips	VMT per Trip
2-4 Axle Trucks (Arriving and Departing)	37.4	LHDT1, LHDT2, and MHDT	755,339[2]	209,690[2]	3.60
5+ Axle Trucks (Arriving from Port)	31.3 (50% of total HHDT Trips[4])	HHDT	N/A	N/A	37[3]
5+ Axle Trucks (Departing)	31.3 (50% of total HHDT Trips[4])	HHDT	1,900,421	231,587	8,21
				Weighted Average (All Truck Trips)	**14.74**

Notes:

1 Based on project traffic impact analysis, Appendix L of this EIR.

2 LHDT1, LHDT2, and MHDT conservatively based on EMFAC VMT and Trip data for MHDT.

3 Based on the distance from the project site to the Otay Mesa Port of Entry.

4 Percent of truck trips represents arrival and departure trips, therefore 50% of trips (arrival) conservatively assumed to originate at the Otay Mesa Port of Entry. 50% of trips assumed to depart the project facility and estimated truck trip distance is based on EMFAC county-wide average HHDT truck VMT per trip.

Project truck idling would be limited to 5 minutes in accordance with CARB's adopted Airborne Toxic Control Measure; however, for HRA modeling purposes, it was conservatively assumed that the trucks would idle for a total of 15 minutes: 5 minutes at the entrance, 5 minutes at the loading dock, and 5 minutes at the exit of the Project site.

Energy Source Emissions

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for greenhouse gas emissions in CalEEMod, since criteria pollutant emissions would occur at the site of power plants, which are not on the Project site. However, natural gas combustion would occur at the Project site itself, in association with equipment that uses natural gas. The emissions associated with natural gas use were calculated using CalEEMod default parameters, which assume compliance with the 2019 Title 24 Building Energy Efficiency Standards and represents a conservative analysis compared to the 2022 standards.

Off-Road Equipment

It is common for industrial buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. The most common type of cargo handling equipment are forklifts, pallet jacks, and yard trucks, which are designed for moving cargo containers. Yard trucks are also known as yard goats, utility tractors, hustlers, yard hostlers, and yard tractors. The cargo handling equipment is assumed to have a horsepower (hp) range of approximately 175 hp to 215 hp. For this Project, based on the maximum square footage of building space permitted by the Project, on-site modeled operational equipment includes a total of 36 Tier4i or better diesel fueled forklifts (forklifts and pallet jacks) and 1 Tier4i or better diesel fueled yard tractors operating at 8 hours a day for 365 days of the year.

For additional details see Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*, of Appendix B to this EIR.

Construction Health Risk Analysis

An HRA was performed to assess the impact of construction on sensitive receptors proximate to the Project site. This report includes an HRA associated with emissions from construction of the proposed Project based on the methodologies prescribed in the Office of Environmental Health Hazard Assessment (OEHHA) document, Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidelines) (OEHHA 2015). To implement the OEHHA Guidelines based on proposed project information, the SDAPCD has developed a three-tiered approach where each successive tier is progressively more refined, with fewer conservative assumptions. The SDAPCD document, Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (SDAPCD 2022a), provides guidance with which to perform HRAs within the SDAB.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SDAPCD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Additionally, some TACs increase non-cancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. The SDAPCD recommends a Chronic Hazard Index significance threshold of one (project increment). The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure level has been established for DPM; therefore, acute impacts of DPM are not addressed in this

assessment. The HRA for the Project evaluated the risk to existing off-site residents from diesel emissions from exhaust from on-site construction equipment and diesel haul and vendor trucks.

The dispersion modeling of DPM was performed using the American Meteorological Society/EPA Regulatory Model (AERMOD), which is the model SDAPCD requires for atmospheric dispersion of emissions. AERMOD is a steady-state Gaussian plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of surface and elevated sources, building downwash, and simple and complex terrain (EPA 2021). For the Project, AERMOD was run with all sources emitting unit emissions (one gram per second) to obtain the "X/Q" values. X/Q is a dispersion factor that is the average effluent concentration normalized by source strength and is used as a way to simplify the representation of emissions from many sources. The X/Q values of ground-level concentrations were determined for construction emissions using AERMOD and the maximum concentrations determined for the one-hour and period-averaging periods. Principal parameters of this modeling are presented in Table 4.2-7.

Table 4.2-7. AERMOD Principal Parameters

Parameter	Details
Meteorological Data	The latest three-year meteorological data (2019–2021) for the Lexington Elementary School Station were obtained from SDAPCD as the recommended meteorological station and input to AERMOD.
Terrain Characteristics	The elevation of the modeled site is about 100 meters above sea level. Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate.
Elevation Data	Digital elevation data were imported into AERMOD, and elevations were assigned to the emission sources and receptors. Digital elevation data were obtained through AERMOD View in the U.S. Geological Survey's National Elevation Dataset format with a 10-meter resolution.
Emission Sources and Release Parameters	Air dispersion modeling of DPM from construction equipment was conducted using emissions estimated using CalEEMod, assuming emissions would occur eight hours per day, five days per week. Vendor and hauling trips were modified to account only for emissions occurring within 1,000 ft of the Project site. The Project area was modeled as a series of adjacent line-volume sources.
Source Release Characterizations	The source release height was assumed to be 3.4 meters with plume height and width of 6.8 and 8.6 meters per volume source.

Notes: AERMOD = American Meteorological Society/EPA Regulatory Model; SDAPCD = San Diego Air Pollution Control District; DPM = diesel particulate matter; CalEEMod = California Emissions Estimator Model.
See Appendix B of this EIR for additional information.

Dispersion model plot files from AERMOD were then imported into CARB's Hotspots Analysis Reporting Program (HARP) Version 2 (Version 22118) to determine health risk, which requires peak one-hour emission rates and annual emission rates for all pollutants for each modeling source. For the residential health risk, the HRA assumes exposure would start in the third trimester of pregnancy for a duration of 15 months.

Operational Health Risk Assessment

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* encourages consideration of the health impacts of distribution centers that accommodate more than 100 trucks per day on sensitive receptors sited within 1,000 feet from the source in the land use decision-making process (CARB 2005). For the operational health risk, the operation year 2025 was assumed consistent with completion of Project construction. Emissions from the operation of the Project include truck trips, and truck idling emissions and emissions from the routing maintenance

of the onsite emergency fire-water pump engine. For risk assessment purposes, PM_{10} in diesel exhaust is considered DPM, originating mainly from trucks traveling on site and off site and truck idling located at the loading docks. Truck travel and idling emission rates were obtained from CARB's EMFAC2021. Emission factors representing the vehicle mix and emissions for 2025 were used to estimate emissions associated with operation of the Project. Truck idling would be limited to 5 minutes in accordance with CARB's adopted Airborne Toxic Control Measure; however, truck idling was conservatively assumed to idle for 15 minutes.[4] Therefore, the analysis conservatively overestimates DPM emissions from idling. All deliveries would occur Monday through Sunday.

Conservatively, a 2025 EMFAC2021 run was conducted and a constant 2025 emission factor data set was used for the entire duration of the analysis (i.e., 30 years). Use of the 2025 emission factors would overstate potential impacts since this approach does not include reductions in emissions due to fleet turnover or cleaner technology with lower emissions. The truck travel DPM emissions were calculated by applying the exhaust PM_{10} emission factor from EMFAC2021 and the total truck trip number over the length of the distance traveled. In addition, the on-site truck idling exhaust emissions were calculated by applying the idle exhaust PM_{10} emission factor from EMFAC2021 and total truck trip over the total idling time (i.e., 15 minutes).

The dispersion modeling was performed to estimate emissions at proximate receptors using AERMOD (Version 13.0.0). The truck traffic was modeled as a line of adjacent volume sources with a trip distribution consistent with the traffic analysis including 90 percent (%) truck trips to and from Highway 52 to the Project site via Highway 67 and 10% of truck trips traveling to and from north of the Project site via Highway 67. Truck idling was modeled as line volume sources.

As previously described, health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SDAPCD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Some TACs increase noncancer health risk due to long-term (chronic) exposures. A hazard index less than one (1.0) means that adverse health effects are not expected. Within this analysis, noncarcinogenic exposures of less than 1.0 are considered less than significant. The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure values are established and regulated and are therefore not addressed in this assessment.

Dudek evaluated the Project's potential cancer and noncancer health impacts using exposure periods appropriate to evaluate long-term emission increases (third trimester of pregnancy to 30 years). Emissions dispersion of DPM was modeled using AERMOD, then cancer risk and noncancer health impacts subsequently using the CARB HARP2 (ADMRT, Version 22118). The health risk results were then compared to SDAPCD thresholds to assess Project significance. Principal parameters of this modeling are presented in Table 4.2-8.

Table 4.2-8. Operational Health Risk Assessment American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model Operational Principal Parameters

Parameter	Details
Meteorological Data	The latest three-year meteorological data (2019–2021) for the Lexington Elementary School Station were obtained from SDAPCD as the recommended meteorological station and input to AERMOD.

[4] Although the Project is required to comply with CARB's idling limit of 5 minutes, on-site idling emissions was estimated for 15 minutes of truck idling, which would take into account on-site idling while the trucks are waiting to pull up to the loading dock, idling at the loading dock, and idling during check-in and check-out.

Table 4.2-8. Operational Health Risk Assessment American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model Operational Principal Parameters

Parameter	Details
Terrain Characteristics	The elevation of the modeled site is about 100 meters above sea level. Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate. Digital elevation data were imported into AERMOD, and elevations were assigned to the emission sources and receptors. Digital elevation data were obtained through AERMOD View in the U.S. Geological Survey's National Elevation Dataset format with a 10-meter resolution.
Emission Sources and Release Parameters	Air dispersion modeling of off-site and on-site truck travel and were conducted using emissions generated using EMFAC2021. Truck idling equipment emissions were estimated using EMFAC2021.
Source Release Characterizations	Off-site and on-site truck travel were modeled as a line of adjacent volume sources, with a release height of 3.4 meters, a plume height of 6.8 meters, and a plume width of 13.4 meters. The truck idling emissions were modeled as a line of adjacent volume sources with a plume height of 8 meters, plume width of 8.6 meters, and release height of 4 meters. Emergency Fire-Water Pump Engine was modeled as a point source exiting the warehouse roof, with stack height of 55 feet and stack diameter of 8 inches.

Source: See Appendix B of this EIR.
Note: AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model

Combined Construction and Operational Health Risk Assessment

While the SDAPCD does not specifically recommend a combined construction and operational HRA, the analysis is provided for informational purposes. The combined HRA analysis adds each common receptor impacts of construction and operation together to form a combined impact. The operational health risk analysis begins after construction HRA at approximately 15 months and concludes at a combined 30 years.

4.2.4 Impacts Analysis

A. Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Less-than-Significant Impact. As stated in Section 4.2.2, Local, SDAPCD and SANDAG are responsible for developing and implementing the clean air plans for attainment and maintenance of the NAAQS and CAAQS in the SDAB; specifically, the SIP and RAQS.[5] The federal O_3 maintenance plan, which is part of the SIP, was adopted in 2016. The SIP includes a demonstration that current strategies and tactics will maintain acceptable air quality in the SDAB based on the NAAQS. The RAQS was initially adopted in 1991 and is updated every 3 years. The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O_3. The SIP and RAQS rely on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the County as part of the development of their general plans.

[5] For the purpose of this discussion, the relevant federal air quality plan is the O_3 maintenance plan (SDAPCD 2016b). The RAQS is the applicable plan for purposes of state air quality planning. Both plans reflect growth projections in the SDAB.

The most recent update, the 2022 Regional Air Quality Strategy, was finalized in 2023. The 2022 RAQS contains strategies to continue directly reducing emissions of ozone precursors in San Diego County. As a co-benefit of these strategies, the 2022 RAQS is assisting in the reduction of particulate matter and greenhouse gases. Consistent with the District's recent reorganization pursuant to Assembly Bill (AB) 423 (Gloria, 2019), the 2022 RAQS also proposes to expand the District's involvement as a regional agency within our regulatory authority, by including commitments to support research and innovation opportunities, developing new partnerships with public and private entities, convening more opportunities for engagement and education with stakeholders, and integrating environmental justice and equity into all District actions.

If a project that proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality. The City of Santee General Plan identifies the site as Light Industrial. The existing land use designation and zoning allows for a wide range of industrial uses, including warehouse, storage and distribution facilities. The Project is consistent with the underlying land use and zoning for the Project.

The Project is consistent with the underlying land use and zoning for the Project site. Therefore, the Project source emissions are not anticipated to result in air quality impacts that were not previously envisioned in the growth projections and RAQS, and implementation of the Project would not result in development in excess of that anticipated in local plans or increased development beyond those contemplated by SANDAG. Because the proposed land uses and associated vehicle trips are anticipated in local air quality plans, the Project would be consistent at a regional level with the underlying growth forecasts in the RAQS. Accordingly, the Project would not conflict with and would not obstruct implementation of applicable local and regional air quality plans; impacts would be **less than significant**.

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?

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and SDAPCD develops and implements plans for future attainment of the NAAQS and CAAQS. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether the project's individual emissions would have a cumulatively significant impact on air quality.

Construction

Less-than-Significant Impact. Construction of the Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (vendor and haul truck trips, and worker vehicle trips). Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Criteria air pollutant emissions associated with construction activities were quantified using CalEEMod Default values provided by the program were used where detailed Project information was not available. A detailed description of the construction schedule—including information regarding phasing, equipment used during each phase, haul trucks, vendor trucks, and worker vehicles—is included in Section 4.2.3, Methodology, above.

Development of the Project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, asphalt pavement application, and architectural coatings. Fugitive dust would be limited through compliance with SDAPCD Rule 55, which requires the restriction of visible emissions of fugitive dust beyond the

property line through watering exposed areas of the Project site at least 2 times per day and limiting vehicle travel to ten miles per hour on unpaved roads.

Table 4.2-9 shows the estimated maximum unmitigated daily construction emissions associated with the conceptual construction phases of the Project. Complete details of the emissions calculations are provided in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files*, of Appendix B to this Draft EIR.

Table 4.2-9. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Construction Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
2024	1.26	31.60	36.40	0.12	16.35	3.24
2025	58.80	11.40	21.60	0.03	1.52	0.46
Maximum	**58.80**	**31.60**	**36.40**	**0.12**	**16.35**	**3.24**
SDAPCD threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego Air Pollution Control District.
See Appendix B of this EIR for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

As shown in Table 4.2-9, daily construction emissions for the Project would not exceed SDAPCD's significance thresholds for any criteria air pollutant. Therefore, the Project would have a **less than significant impact** related to emissions of criteria air pollutant emissions during construction.

Operations

Less-than-Significant Impact. Operation of the Project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources (vehicle trips), cargo handling equipment, area sources (consumer products, landscape maintenance equipment), routine maintenance of the emergency fire-water pump engine and energy sources. As discussed in Section 4.2.3, Methodology, pollutant emissions associated with long-term operations were quantified using CalEEMod and include warehouse land use. Future tenants/users are not yet known, nevertheless, the SDAPCD has the air permitting authority for any stationary sources that may be identified by future tenants. The Project includes an onsite fire-water pump engine and associated emissions were estimated with CalEEMod. Project-generated mobile source emissions were estimated in CalEEMod based on project-specific trip rates. CalEEMod default values were used to estimate emissions from the Project area and energy sources. The Project includes project design features (PDFs) (see Section 3.3.3 of this Draft EIR) that require the cargo handling equipment including forklifts (forklifts and pallet jacks) and yard tractors for facility operation to be Tier 4 Interim engines or better.

Table 4.2-10 presents the unmitigated maximum daily emissions associated with the operation of the Project in 2025 after all phases of construction have been completed. Complete details of the emissions calculations are provided in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files,* of Appendix B, *Air Quality and Greenhouse Gas Emissions Technical Report*, of this EIR. Emissions represent maximum of summer and winter for each source regardless of season. "Summer" emissions are representative of the conditions that may occur during the O_3 season (May 1 to October 31), and "winter" emissions are representative of the conditions that may occur during the balance of the year (November 1 to April 30).

Table 4.2-10. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	8.99	0.11	13.1	<0.005	0.02	0.02
Energy	0.07	1.18	0.99	0.01	0.09	0.09
Mobile	2.25	18.0	25.90	0.17	8.58	2.38
Stationary (Fire-water pump engine)	0.82	2.29	2.09	<0.005	0.12	0.12
Off-Road (Cargo Handling)	0.86	23.00	39.60	0.05	0.11	0.11
Total	***12.99***	***44.58***	***81.68***	***0.23***	***8.92***	***2.72***
SDAPCD threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego Air Pollution Control District. <0.01 = reported value is less than 0.01.
See Appendix A for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

As shown in Table 4.2-10, daily operational emissions for the Project would not exceed SDAPCD's significance thresholds for any criteria air pollutant. Therefore, operation of the Project would not result in a net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; impacts due to Project operation would be **less than significant.**

C. Would the Project expose sensitive receptors to substantial pollutant concentrations?

Carbon Monoxide Hotspots

Less than Significant Impact. Regionally, project-related travel will add to regional trip generation and increase the vehicle miles traveled within the SDAB. Locally, project traffic will be added to the City's roadway system. If such traffic occurs during periods of poor atmospheric ventilation, consists of a large number of vehicles "cold-started" and operating at pollution-inefficient speeds, and operates on roadways already crowded with non-project traffic, there is a potential for the formation of microscale CO "hotspots" in the area immediately around points of congested traffic. Because of continued improvement in mobile emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the basin is steadily decreasing.

Projects contributing to adverse traffic impacts at high congested intersections may result in the formation of CO hotspots. To determine whether the Project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO hotspots was conducted. The County's CO hotspot screening guidance (County of San Diego 2007) was followed to determine whether the Project would require a site-specific hotspot analysis. Per guidance, any project that would place receptors within 500 feet of a signalized intersection operating at or below LOS E (peak-hour trips exceeding 3,000 trips) must conduct a "hotspot" analysis for CO. Likewise, projects that will cause road intersections to operate at or below a LOS E (i.e., with intersection peak-hour trips exceeding 3,000) will also have to conduct a CO "hotspot" analysis. As presented in the Transportation Impact Study (Appendix L), the following intersections were analyzed:

Roadway Segments:

- Magnolia Avenue, south of Mission Gorge - Woodside Avenue
- Woodside Avenue, between Magnolia Avenue and Woodside Avenue
- Woodside Avenue, between Woodside Avenue to Project Driveway

Intersections:

- Magnolia Avenue/SR-52 EB Off-Ramps
- Magnolia Avenue/SR-52 WB On-Ramp - SR-67 SB On-Ramp
- Magnolia Avenue - Mission Gorge Road/Woodside Avenue
- Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp
- Hartley Road/Woodside Avenue
- Wheatlands Avenue/Woodside Avenue
- Project Access Driveway/Woodside Avenue

As presented in the Transportation Impact Study (Appendix L of this Draft EIR), all study area roadway segments and intersections would continue to operate at satisfactory levels of service (LOS D or better) under Near Term plus Project conditions with the exception of the Magnolia Avenue - Mission Gorge Road/Woodside Avenue intersection and the Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection. However, for the Magnolia Avenue - Mission Gorge Road/Woodside Avenue intersection the proposed project would not increase the delay by more than 2 seconds and therefore, not exceed the City's criteria for project specific traffic effect under Horizon Year plus Project conditions. No improvements are required, and as such, no impacts are expected for the formation of adverse CO hotspots.

As presented in the Transportation Impact Study (Appendix I) the proposed project would result in a traffic effect at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection, under Existing plus Project, Near Term plus Project conditions, and Horizon Year plus Project conditions, The project would construct a missing segment of sidewalk along N. Woodside Avenue near the N. Woodside Avenue/Woodside Avenue - SR-67 SB Off-Ramp intersection and near the project driveway, for a total of 990 linear feet or approximately 0.2 miles. The project would also be responsible for pavement rehabilitation and restriping of N. Woodside Avenue to the satisfaction of the City Engineer from Caltrans right-of-way at the intersection of the SR-67 to the easternmost edge of the project driveway's intersection with N. Woodside Avenue. In addition, the project would install approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk. Although this improvement would not reduce delay or improve LOS at the Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection, it would improve non-vehicular circulation and pavement conditions along Woodside Avenue and would be considered an acceptable improvement by the City in lieu of improving delay or LOS at the intersection.

In addition, at the time that the South Coast Air Quality Management District (SCAQMD) Handbook (SCAQMD 1993) was published, the South Coast Air Basis (SCAB) was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels,

and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP[6] (SCAQMD 2003b) for the four worst-case intersections in the SCAB:

1. Wilshire Boulevard and Veteran Avenue
2. Sunset Boulevard and Highland Avenue
3. La Cienega Boulevard and Century Boulevard
4. Long Beach Boulevard and Imperial Highway

At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. The 2003 AQMP projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 parts per million at the Sunset Boulevard and Highland Avenue intersection in 2002 and the maximum 8-hour CO concentration was 3.4 parts per million at the Wilshire Boulevard and Veteran Avenue in 2002.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. While the project is not located in the SCAB, similar localized ambient impacts can be expected near intersections regardless of location. The Project estimated horizon year plus Project intersection volumes results in 27,100 and 26,620 daily total vehicles for AM and PM conditions, see Appendix A. Because the project is not anticipated to increase daily traffic volumes at N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection more than 100,000 vehicles per day, a CO hotspot is not anticipated to occur.

Therefore, the Project would not generate traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots and no hotspot analysis is required. Based on these considerations, the Project would not expose sensitive receptors to substantial CO concentrations; impacts based on CO exposure would be **less than significant**.

Toxic Air Contaminants

Construction Health Risk

Less-than-Significant Impact. In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the state and federal government as TACs or HAPs. The greatest potential for TAC emissions during construction would be DPM emissions from heavy equipment operations and heavy-duty trucks, and the associated health impacts to sensitive receptors. Construction of the Project would occur over a period of approximately 15 months. The closest sensitive receptors to the Project site are single-family residences to the north of the site and north of the San Diego River and single and multifamily residential units south of the Project site and south of Highway 67. As such, a construction health risk analysis was performed for the Project as discussed below.

Table 4.2-11 summarizes the results of the HRA for Project construction, and detailed results are provided in Appendix B of Appendix B, *Health Risk Assessment Output Files*.

[6] SCAQMD's CO hotspot modeling guidance has not changed since 2003.

Table 4.2-11. Construction Activity Health Risk Assessment Results - Unmitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Offsite				
Cancer Risk	Per Million	1.39	10.0	Less than Significant
Chronic Hazard Index – Residential	Not Applicable	0.0012	1.0	Less than Significant

Source: Appendix B of this EIR
Notes: CEQA = California Environmental Quality Act; HIC = Chronic Hazard Index.

The results of the HRA demonstrate that the TAC exposure from construction diesel exhaust emissions would result in a cancer risk on site of less than the 10 in 1 million threshold, as well as Chronic Hazard Index less than 1.0. Therefore, TAC emissions from construction of the Project would not expose sensitive receptors to substantial pollutant concentrations and would result in a **less than significant** impact.

Operational Health Risk

Less-than-Significant Impact. As discussed in Section 4.2.3, an HRA was performed to estimate the Maximum Individual Cancer Risk and Chronic Hazard Index for residential receptors associated with Project operations. Results of the operational HRA are presented in Table 4.2-12.

Table 4.2-12. Operational Health Risk Assessment Results - Unmitigated

Impact Parameter	Units	Impact Level	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	3.80	10	Less than Significant
Chronic Hazard Index – Residential	Index Value	0.00146	1.0	Less than Significant.

Source: Appendix B of this EIR.
Notes: CEQA = California Environmental Quality Act

As shown in Table 4.2-12, the DPM emissions from operation of the Project would result in a Residential Maximum Individual Cancer Risk of 3.80 in 1 million and a Residential Chronic Hazard Index of 0.00146.

The results of the HRA demonstrate that the TAC exposure from operational diesel exhaust emissions would result in cancer risk less than the 10 in 1 million threshold and Chronic Hazard Index less than 1. Therefore, operation of the Project would not expose sensitive receptors to substantial pollutant concentrations; impacts would be **less than significant.**

Combined Construction and Operational Health Risk

Less-than-Significant Impact. As discussed, a combined construction and operational HRA was performed to estimate the Maximum Individual Cancer Risk and Chronic Hazard Index for residential receptors associated with the Project. Results of the combined HRA are presented in Table 4.2-13.

Table 4.2-13. Combined Construction and Operational Health Risk Assessment Results - Unmitigated

Impact Parameter	Units	Impact Level	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	5.14	10	Less than Significant
Chronic Hazard Index – Residential	Index Value	0.0027	1.0	Less than Significant.

Source: Appendix B of this EIR.
Notes: CEQA = California Environmental Quality Act

As shown in Table 4.2-13, the DPM emissions from the combined construction and operation of the Project would result in a Residential Maximum Individual Cancer Risk of in 5.14 million and a Residential Chronic Hazard Index of 0.0027.

The results of the combined construction and operational HRA demonstrate that the TAC exposure from diesel exhaust emissions would result in cancer risk less than the 10 in 1 million threshold and Chronic Hazard Index less than 1. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations; impacts would be **less than significant.**

Health Effects of Criteria Air Pollutants

Less-than-Significant Impact. As demonstrated, construction and operation of the Project would not result in emissions that exceed SDAPCD's emission thresholds for any criteria air pollutants. The SDAPCD thresholds are based on SDAB compliance with the NAAQS and CAAQS which are protective of public health; therefore, no adverse effects to human health would result from the Project. The following provides a general discussion of criteria air pollutants and their health effects.

Some VOCs would be associated with motor vehicles and construction equipment, while others are associated with architectural coatings and asphalt off-gassing, the emissions of which would not result in exceedances of SDAPCD's thresholds. SDAPCD Rule 67.0.1 restricts the VOC content of coatings for both construction and operational applications.

VOCs and NO_x are precursors to O_3, for which the SDAB is designated as nonattainment with respect to certain NAAQS and CAAQS standards (the SDAB is designated by EPA as an attainment area for the 1-hour O_3 NAAQS standard and 1997 8-hour NAAQS standard). The health effects associated with O_3, as discussed in Section 2.1.4, Criteria Air Pollutants, are generally associated with reduced lung function. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry, with increases in O_3 concentrations in the SDAB due to precursor emissions found downwind from the source location. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 NAAQS and CAAQS tend to occur between April and October, when solar radiation is highest. The effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to assess this impact. VOC and NO_x emissions associated with Project construction would only negligibly contribute to regional O_3 concentrations and the associated health impacts. Accordingly, the Project would not expose sensitive receptors to substantial concentrations of VOCs and NO_x; health impacts would be **less than significant.**

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2019). CO tends to be a localized impact associated with congested intersections. CO hotspots were discussed previously as a less than significant impact. Thus, the proposed Project's CO emissions would not contribute to the health effects associated with this pollutant. Health impacts would be **less than significant**.

Construction of the Project would not exceed thresholds for PM_{10} or $PM_{2.5}$ and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter. As noted above, PM_{10} or $PM_{2.5}$ emissions during both construction and operation of the Project would be less than the applicable SDAPCD threshold. Accordingly, the Project would not expose sensitive receptors to substantial concentrations of PM_{10} or $PM_{2.5}$; health impacts would be **less than significant**.

Nitrogen oxides (NOx) is a term used to describe the sum of nitric oxide (NO), nitrogen dioxide (NO_2), and other oxides of nitrogen. As such, NO_2 is a constituent of NOx. Construction of the Project would not contribute to exceedances of the NAAQS and CAAQS for NO_2 since NOx emissions would be less than the applicable SDAPCD threshold. As discussed above, the SDAPCD thresholds are based on SDAB compliance with the NAAQS and CAAQS, which are protective of public health; therefore, no adverse effects to human health would result from emissions below threshold. As described in Section 4.2.1, NO_2 health impacts are associated with respiratory irritation, which may be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, these operations would be relatively short term, and the off-road construction equipment would be operating on various portions of the site and would not be concentrated in one portion of the site at any one time. Accordingly, the Project would not expose sensitive receptors to substantial pollutant concentrations of NO_2; impacts would be **less than significant**.

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

Construction

Less than Significant Impact. The State of California Health and Safety Code, Division 26, Part 4, Chapter 3, Section 41700 SDAPCD Rule 51, and the City's Municipal Code prohibit emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. Projects required to obtain permits from SDAPCD are evaluated by SDAPCD staff for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance. Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the Project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors are temporary and for the types of construction activities anticipated for Project components, would generally occur at magnitudes that would not affect substantial numbers of people. In addition, there are no adjacent sensitive receptors to the Project site, the closest sensitive receptors are approximately 0.15 mile north and south of the Project site. Therefore, construction of the Project would not result in odors that would adversely affect a substantial number of people, and impacts associated with odors during construction would be **less than significant**.

Operation

Less-than-Significant Impact. SDAPCD Rule 51 (Nuisance) also prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if

it would affect a considerable number of off-site receptors. Odor issues are very subjective by the nature of odors themselves because their measurements are difficult to quantify. As a result, this guideline is qualitative, and will focus on the existing and potential surrounding uses and location of sensitive receptors.

Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine if potential odors would have a significant impact. Examples of land uses and industrial operations that are commonly associated with odor complaints include agricultural uses, wastewater treatment plants, food processing facilities, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities. In addition to the odor source, the distance between the sensitive receptor(s) and the odor source, as well as the local meteorological conditions, are considerations in the potential for a project to frequently expose the public to objectionable odors. Although localized air quality impacts are focused on potential impacts to sensitive receptors, such as residences and schools, other land uses where people may congregate (e.g., workplaces) or uses with the intent to attract people (e.g., restaurants and visitor-serving accommodations) should also be considered in the evaluation of potential odor nuisance impacts. The Project would not include operations of agricultural uses, wastewater treatment plants, food processing facilities, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding facilities. As such, the Project is not expected to produce any nuisance odors due to its operation. In the event the Project is required to obtain a permit from SDAPCD, SDAPCD staff would review the Project for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance. Therefore, operation of the Project would not result in odors that would adversely affect a substantial number of people, impacts related to odors during operation would be **less than significant**.

4.2.5 Mitigation Measures and Level of Significance After Mitigation

All impacts related to air quality would be less than significant. No mitigation is required.

4.3 Biological Resources

This section describes the existing biological resources conditions of the Palisade Santee Commerce Center (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to implementation of the Project.

In addition to the documents incorporated by reference (see Section 2.7 of Chapter 2 of this Environmental Impact Report [EIR]), the following analysis is based, in part, on the following source:

- *Biological Technical Report* (BTR), prepared by Dudek in May 2024 (Appendix C)

4.3.1 Existing Conditions

The approximately 13.5-acre Project site is in the southeastern part of the City of Santee and is currently a developed parking lot with a two-screen drive-in theatre and a building containing restrooms and a snack bar. The Project site boundary extends slightly beyond the pavement into the undeveloped area located approximately 20 to 30 feet above the San Diego River corridor. The following sections describe the existing biological resources within the Project site and potentially occurring within adjacent areas associated with the San Diego River (i.e., 500-foot surrounding buffer).

4.3.1.1 Vegetation Communities and Land Covers

Vegetation community classifications within the Project site follow Holland (1986), as revised by Oberbauer et al. (2008). Based on species composition and general physiognomy, four vegetation communities or land cover types occur within the Project site and 10 vegetation communities or land cover types occur within the 500-foot buffer surrounding the Project site. Acreages for each vegetation community or land cover type are provided in Table 4.3-1, below, and their spatial distributions are shown in Figure 4.3-1, Biological Resources. Descriptions of each vegetation community and land cover type are included in Section 4.1 of Appendix C of this Draft EIR.

Table 4.3-1. Vegetation Communities and Land Covers within the Project Site and 500-Foot Buffer

Vegetation Community/Land Cover Type	Holland/Oberbauer Code	500-Foot Buffer (Acres)	Project Site (Acres)
Riparian/Bottomland Vegetation Communities			
Coastal and Valley Freshwater Marsh	52410	1.52	0
Southern Arroyo Willow Riparian Forest	61320	5.69	0
Southern Cottonwood–Willow Riparian Forest	61330	0.56	0
Southern Willow Scrub	63320	2.02	0
Open Water	64140	8.09	0
Riparian/Bottomland Vegetation Communities Subtotal		*17.88*	*0*
Upland Vegetation Communities			
Diegan Coastal Sage Scrub	32500	1.04	0
Non-Native Communities and Land Cover Types			
Non-Native Grassland	42200	0.95	0.27

Table 4.3-1. Vegetation Communities and Land Covers within the Project Site and 500-Foot Buffer

Vegetation Community/Land Cover Type	Holland/Oberbauer Code	500-Foot Buffer (Acres)	Project Site (Acres)
Non-Native Woodland	79000	0.62	0.51
Disturbed Habitat	11300	0.48	0.02
Urban/Developed	12000	53.39	12.70
Non-Native Communities and Land Cover Types Subtotal		*55.45*	*13.49*
Total		**74.37**	**13.49**

Note: Totals may not sum due to rounding.

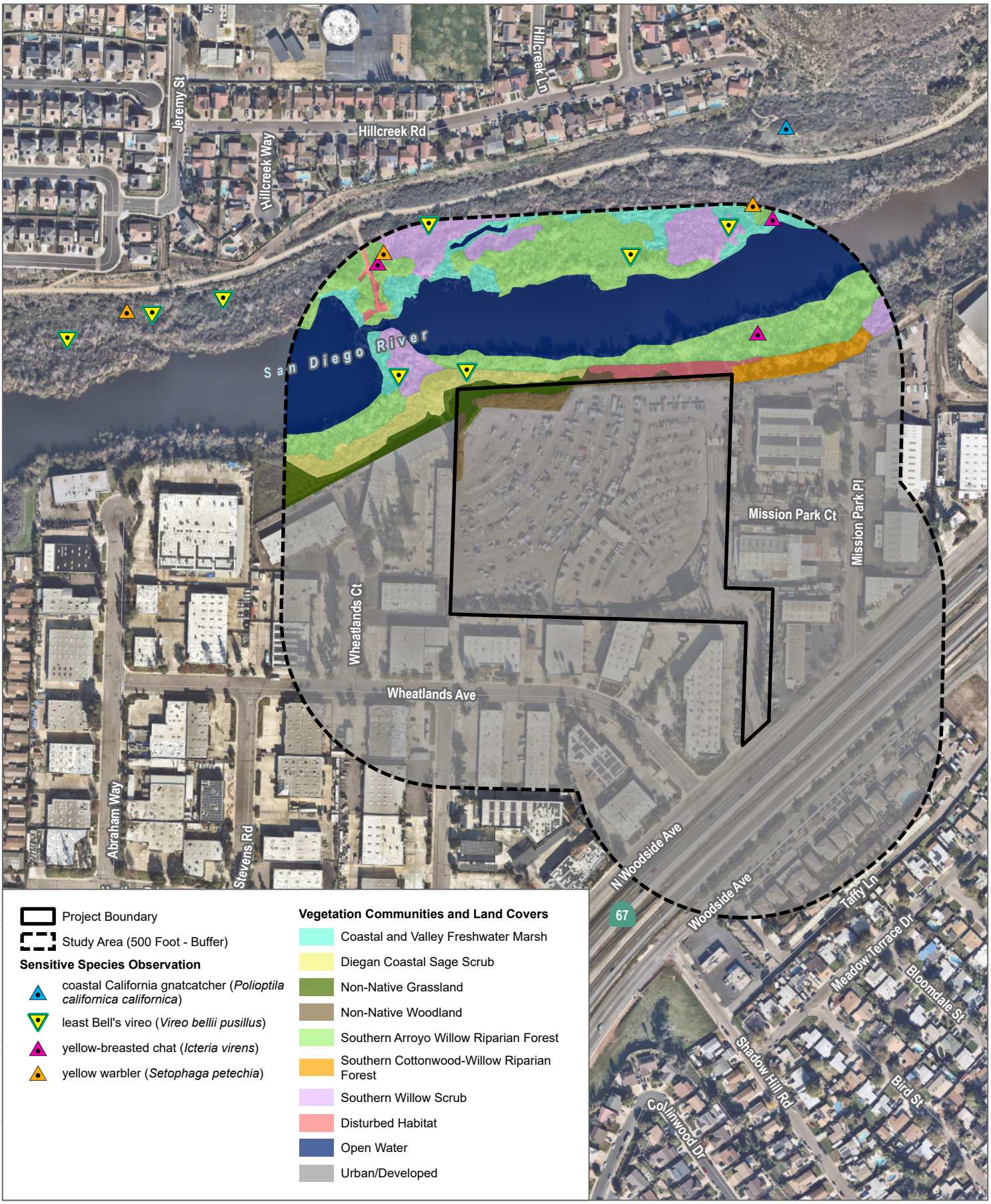
4.3.1.2 Plants and Wildlife Observed

A total of 19 species of native or naturalized plants, 2 native (11%) and 17 non-native (89%), were recorded on the site (see Appendix B of Appendix C of this Draft EIR). The majority of these plant species are ornamental trees planted in association with the current development on site. Due to the lack of habitat (i.e., site is currently a parking lot), very few wildlife species were observed within the Project site (i.e., eight bird species and one mammal species). A total of 42 wildlife species common to San Diego County were observed within the surrounding area during surveys. Appendix B of Appendix C of this Draft EIR lists all wildlife species observed within the Project site and the 500-foot surrounding buffer.

4.3.1.3 Special-Status Plants

Special-status plant species include those listed, or candidates for listing, as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW), and species identified as rare by the California Native Plant Society (particularly California Rare Plant Rank [CRPR] 1A, presumed extinct in California; CRPR 1B, rare, threatened, or endangered throughout its range; and CRPR 2, rare or endangered in California, more common elsewhere). BTR Appendix C provides a table of all special-status plant species whose geographic ranges fall within the general vicinity of the Project site. Special-status species' potential to occur within the Project site were evaluated based on known species distribution, species-specific habitat preferences, and Dudek biologists' knowledge of regional biological resources. Each special-status species was assigned a rating of "not expected," "low," "moderate," or "high" potential to occur within the Project site based on relative location to known occurrences, vegetation community, soil, and elevation.

No special-status plant species were observed within the Project site during surveys, and due to lack of habitat, none are expected to occur. There is moderate potential for special-status plant species to occur off site within suitable habitat areas in the 500-foot buffer surrounding the Project site within the San Diego River corridor.



SOURCE: SanGIS, Open Street Maps

DUDEK

0 100 200 Feet

Figure 4.3-1

Biological Resources

Palisades Santee Commerce Center Project

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4.3.1.4 Special-Status Wildlife

Special-status wildlife species include those listed, or candidates for listing, as threatened or endangered by USFWS and CDFW, those designated as Species of Special Concern by CDFW, and those designated as sensitive by USFWS. BTR Appendix D provides a table of all special-status wildlife species whose geographic ranges fall within the general vicinity of the Project site. Special-status species' potential to occur within the Project site were evaluated based on known species distribution, species-specific habitat preferences, and Dudek biologists' knowledge of regional biological resources. Each special-status species was assigned a rating of "not expected," "low," "moderate," or "high" potential to occur within the Project site based on relative location to known occurrences, vegetation community, soil, and elevation.

No special-status wildlife species were observed within the Project site during surveys, and due to lack of habitat, none are expected to occur. However, three special-status wildlife species—least Bell's vireo (*Vireo bellii pusillus*), yellow-breasted chat (*Icteria virens*), and yellow warbler (*Setophaga petechia*)—were observed off site within the Project site's 500-foot buffer that overlaps the riparian habitat associated with the San Diego River. Three nesting pairs of least Bell's vireo were detected within the riparian habitat; one pair occurred on the southern side of the San Diego River and two pairs occurred on the northern side. One pair of yellow breasted chat was detected, and both were active across much of the habitat. A number of yellow warblers were detected, and much of the riparian habitat was used by them.

Additionally, coastal California gnatcatcher (*Polioptila californica californica*) was observed outside the 500-foot buffer (more than 700 feet north of the Project site) in coastal scrub habitat during the riparian bird surveys. However, there is minimal suitable habitat for this species within the 500-foot buffer area. The coastal sage scrub occurring within the 500-foot buffer is small (i.e., approximately 1 acre), disturbed, on steep slopes, and likely not used for nesting by this species.

4.3.1.5 Jurisdictional Resources

No jurisdictional aquatic resources were observed within the Project site during the jurisdictional aquatic resource assessment. The northern edge of the Project site is adjacent to stands of thick vegetation occurring along a chain-link fence line that lines the parking lot. This vegetation was dominated by African sumac (*Searsia lancea*), a non-native low-growing tree species that is known to occupy disturbed areas. African sumac would not be considered a jurisdictional wetland or riparian vegetation subject to aquatic resources regulation. In addition, the edge of the Project site occurs at least 20 to 30 feet in elevation higher than and approximately 70 to 100 feet south of the riparian (willow forest) and wetland (freshwater marsh) vegetation communities associated with the San Diego River. These wetland areas occur outside of the Project site. A strip of disturbed habitat separates the San Diego River and the upland communities adjacent to the Project site; multiple encampments created by people experiencing homelessness were observed in this area. Two culverts were observed during the jurisdictional aquatic resource assessment that appear to transport flows from the Project site boundary northward toward the San Diego River; however, no channels or aquatic resources have developed around the culvert structures. Other culverts could exist but are likely obscured by vegetation growth and erosion.

4.3.1.6 Wildlife Corridors and Habitat Linkages

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Wildlife corridors contribute to population viability by ensuring continual exchange of genes

between populations, providing access to adjacent habitat areas for foraging and mating, and providing routes for recolonization of habitat after local extirpation or ecological catastrophes (e.g., fires).

Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat fragmentation. Habitat linkages provide a potential route for gene flow and long-term dispersal of plants and animals and may also serve as primary habitat for smaller animals, such as reptiles and amphibians. Habitat linkages may be continuous habitat or discrete habitat islands that function as steppingstones for dispersal.

The San Diego Multiple Species Conservation Program (MSCP) Plan (City of San Diego 1998) defines core and linkage areas as those maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside of the MSCP study area either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained.

The Project site is currently developed as a parking lot and drive-in theater and is not mapped as a core area or habitat linkage under the MSCP (City of San Diego 1998). Therefore, the Project site does not function as a wildlife corridor or habitat linkage. However, the Project site is adjacent to the San Diego River, which could potentially function as a wildlife corridor for local populations of common species. Larger species, like mule deer (*Odocoileus hemionus*) and mountain lion (*Puma concolor*), are not expected to use this highly urbanized vicinity of the river corridor due to the amount of adjacent commercial and industrial uses, large presence of human encampments, and general lack of connectivity to larger core areas of suitable habitat. It is unlikely that bobcat would use this area for the same reasons. Species most likely to use this area include coyote (*Canis latrans*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), and Virginia opossum (*Didelphis virginiana*).

4.3.2 Relevant Plans, Policies, and Ordinances

Federal

Federal Endangered Species Act

The federal Endangered Species Act (FESA) of 1973 (16 USC 1531 et seq.), as amended, is administered by USFWS for most plant and animal species, and by the National Oceanic and Atmospheric Administration National Marine Fisheries Service for certain marine species. This legislation is intended to provide a means to conserve the ecosystems upon which endangered and threatened species depend, and provide programs for the conservation of those species, thus preventing the extinction of plants and wildlife. FESA defines an endangered species as “any species that is in danger of extinction throughout all or a significant portion of its range.” A threatened species is defined as “any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.” Under FESA, it is unlawful to “take” any listed species; “take” is defined as, “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.”

FESA allows for the issuance of incidental take permits for listed species under Section 7, which is generally available for projects that also require other federal agency permits or other approvals, and under Section 10, which provides for the approval of habitat conservation plans on private property without any other federal agency involvement.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act prohibits the intentional and unintentional take of any migratory bird or any part, nest, or eggs of any such bird. Under the Migratory Bird Treaty Act, "take" is defined as pursuing, hunting, shooting, capturing, collecting, or killing, or attempting to do so (16 USC 703 et seq.). Currently, the Migratory Birds office considers nests that support eggs, nestlings, or juveniles to be active. Additionally, Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, requires that any project with federal involvement address impacts of federal actions on migratory birds with the purpose of promoting conservation of migratory bird populations (66 FR 3853–3856). Executive Order 13186 requires federal agencies to work with USFWS to develop a memorandum of understanding. USFWS reviews actions that might affect these species.

Clean Water Act

The Clean Water Act (CWA) provides guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Section 401 requires a project operator for a federal license or permit that allows activities resulting in a discharge to waters of the United States to obtain state certification, thereby ensuring that the discharge will comply with provisions of the CWA. The Regional Water Quality Control Boards (RWQCBs) administer the certification program in California. Section 402 establishes a permitting system for the discharge of any pollutant (except dredged or fill material) into waters of the United States. Section 404 establishes a permit program administered by the U.S. Army Corps of Engineers (USACE) that regulates the discharge of dredged or fill material into waters of the United States, including wetlands. USACE implementing regulations are found in the Code of Federal Regulations (CFR) at 33 CFR Parts 320 to 332. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines, which were developed by the U.S. Environmental Protection Agency in conjunction with USACE (40 CFR 230). The guidelines allow the discharge of dredged or fill material into the aquatic system only if there is no practicable alternative that would have less adverse impacts.

Wetlands and Other Waters of the United States

Based on a recent court case ordering vacation of the Navigable Waters Protection Rule, USACE and the U.S. Environmental Protection Agency have halted implementation of the rule and are interpreting waters of the United States consistent with the pre-2015 regulatory regime until further notice. Per 33 CFR 328.3(a), waters of the United States are defined as follows:

1. All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2. All interstate waters including interstate wetlands;
3. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:
    a. Which are or could be used by interstate or foreign travelers for recreational or other purposes; or
    b. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
    c. Which are used or could be used for industrial purposes by industries in interstate commerce;
4. All impoundments of waters otherwise defined as waters of the United States under this definition;
5. Tributaries of waters identified in paragraphs (a)(1) through (4) of this section;
6. The territorial seas;

7. Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a)(1) through (6) of this section; and
8. Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not waters of the United States.

The USACE/U.S. Environmental Protection Agency Rapanos Guidance states that USACE will regulate traditional navigable waters and adjacent wetlands, and relatively permanent waters tributary to traditional navigable waters and adjacent wetlands. Non-relatively permanent waters (those exhibiting less than 3 months of continuous surface flows) and their adjacent wetlands would be regulated if there is a significant nexus from the site to traditional navigable waters.

The State Water Resources Control Board has authority over wetlands through Section 401 of the CWA, as well as the Porter–Cologne Water Quality Control Act (Porter–Cologne Act), California Code of Regulations Section 3831(k), and California Wetlands Conservation Policy. The CWA requires that an applicant for a Section 404 permit (to discharge dredge or fill material into waters of the United States) first obtain certification from the appropriate state agency stating that the fill is consistent with the state's water quality standards and criteria. In California, the authority to either grant certification or waive the requirement for permits is delegated by the State Water Resources Control Board to the nine RWQCBs. A request for certification is submitted to the RWQCB at the same time that an application is filed with USACE.

State

California Endangered Species Act

The California Endangered Species Act (CESA) (California Fish and Game Code Sections 2050–2068) provides protection for and prohibits the take of plant, fish, and wildlife species listed by the State of California. Unlike FESA, under CESA, state-listed plants have the same degree of protection as wildlife, but insects and other invertebrates may not be listed. Take is defined similarly to FESA and is prohibited for both listed and candidate species. Take authorization may be obtained by a project applicant from CDFW under CESA Section 2081, which allows take of a listed species for educational, scientific, or management purposes. In this case, developers consult with CDFW to develop a set of measures and standards for managing the listed species, including full mitigation for impacts, funding of implementation, and monitoring of mitigation measures.

California Fish and Game Code

Fully Protected Species

Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code outline protection for fully protected species of mammals, birds, reptiles, amphibians, and fish. Species that are fully protected by these sections may not be taken or possessed at any time. CDFW cannot issue permits or licenses that authorize the "take" of any fully protected species, except under certain circumstances, such as scientific research and live capture and relocation of such species pursuant to a permit for the protection of livestock. On July 10, 2023, Senate Bill 147 was signed into law and amends the California Fish and Game Code to allow a 10-year permitting mechanism for a defined set of projects within the renewable energy, transportation, and water infrastructure sectors. Furthermore, it is the responsibility of the CDFW to maintain viable populations of all native species. Toward that end, CDFW has

designated certain vertebrate species as Species of Special Concern, because declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction.

Sections 1600–1616

CDFW jurisdiction includes ephemeral, intermittent, and perennial watercourses (including dry washes) and lakes characterized by the presence of (1) definable bed and banks and (2) existing fish or wildlife resources. CDFW takes jurisdiction to the top of bank of the stream, or the limit of the adjacent riparian vegetation, which may include oak woodlands in canyon bottoms. Historical court cases have further extended CDFW jurisdiction to include watercourses that seemingly disappear but reemerge elsewhere. Under the CDFW definition, a watercourse need not exhibit evidence of an ordinary high-water mark to be claimed as jurisdictional. CDFW does not have jurisdiction over ocean or shoreline resources.

Under California Fish and Game Code Sections 1600–1616, CDFW has the authority to regulate work that will substantially divert or obstruct the natural flow of, or substantially change or use any material from, the bed, channel, or bank of any river, stream, or lake. CDFW also has the authority to regulate work that will deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. This regulation takes the form of a requirement for a Lake or Streambed Alteration Agreement and is applicable to all projects. Applications to CDFW must include a complete certified California Environmental Quality Act (CEQA) document.

California Native Plant Protection Act

The Native Plant Protection Act of 1977 (see Section 1900 et seq. of the California Fish and Game Code) directed CDFW to carry out the Legislature's intent to "preserve, protect and enhance rare and endangered plants in this State." The Native Plant Protection Act gave the California Fish and Game Commission the power to designate native plants as "endangered" or "rare" and protect endangered and rare plants from take. CESA expanded on the original Native Plant Protection Act and enhanced legal protection for plants, but the Native Plant Protection Act remains part of the California Fish and Game Code. To align with federal regulations, CESA created the categories of "threatened" and "endangered" species. It converted all "rare" animals into the act as threatened species but did not do so for rare plants. Thus, there are three listing categories for plants in California: rare, threatened, and endangered. Because rare plants are not included in CESA, mitigation measures for impacts to rare plants are specified in a formal agreement between CDFW and the project proponent.

Nesting Birds

Section 3503 of the California Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 protects all birds of prey (raptors) and their eggs and nests. Section 3511 states that fully protected birds or parts thereof may not be taken or possessed at any time. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the Migratory Bird Treaty Act.

California Environmental Quality Act

CEQA requires identification of a project's potentially significant impacts on biological resources and ways that such impacts can be avoided, minimized, or mitigated. CEQA also provides guidelines and thresholds for use by lead agencies for evaluating the significance of proposed impacts.

The State of California CEQA Guidelines (CEQA Guidelines) Section 15380(b)(1) defines endangered animals or plants as species or subspecies whose "survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors." A rare animal or plant is defined in Section 15380(b)(2) as a species that, although not presently threatened with extinction, exists "in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or … [t]he species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered 'threatened' as that term is used in the federal Endangered Species Act." Additionally, an animal or plant may be presumed to be endangered, rare, or threatened if it meets the criteria for listing, as defined further in CEQA Guidelines Section 15380(c).

CDFW has developed a list of "Special Species" as "a general term that refers to all of the taxa the California Natural Diversity Database is interested in tracking, regardless of their legal or protection status." This is a broader list than those species that are protected under FESA, CESA, and other California Fish and Game Code provisions, and includes lists developed by other organizations, including, for example, the Audubon Watch List Species. Guidance documents prepared by other agencies, including the U.S. Bureau of Land Management's Sensitive Species and USFWS Birds of Special Concern, are also included on this CDFW Special Species list. Additionally, CDFW has concluded that plant species listed as CRPR 1 and 2 by the California Native Plant Society, and potentially some CRPR 3 plants, are covered by CEQA Guidelines Section 15380.

Section IV, Appendix G (Environmental Checklist Form), of the CEQA Guidelines requires an evaluation of impacts to "any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS."

Porter–Cologne Water Quality Control Act

Pursuant to provisions of the Porter–Cologne Act, the RWQCBs regulate discharging waste, or proposing to discharge waste, within any region that could affect a water of the state (California Water Code, Section 13260[a]). The State Water Resources Control Board defines a waters of the state as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code, Section 13050[e]). All waters of the United States are waters of the state. Waters of the state include wetlands, and the State Water Resources Control Board definition of wetlands includes the following:

1. Natural wetlands.
2. Wetlands created by modification of a surface water of the state.
3. Artificial wetlands that meet any of the following criteria:
    a. Approved by an agency as compensatory mitigation for impacts to other waters of the state, except where the approving agency explicitly identifies the mitigation as being of limited duration.
    b. Specifically identified in a water quality control plan as a wetland or other water of the state.
    c. Resulted from historic human activity, is not subject to ongoing operation and maintenance, and has become a relatively permanent part of the natural landscape.
    d. Greater than or equal to 1 acre in size unless the artificial wetland was constructed and is currently used and maintained, primarily for one or more of the following purposes:

> industrial or municipal wastewater treatment or disposal; settling of sediment; detention, retention, infiltration, or treatment of stormwater runoff and other pollutants or runoff subject to regulation under a municipal, construction, or industrial permitting program; treatment of surface waters; agricultural crop irrigation or stock watering; fire suppression; industrial processing or cooling water; active surface mining – even if the site is managed for interim wetlands functions and values; log storage; treatment, storage, or distribution of recycled water; maximizing groundwater recharge (this does not include wetlands that have incidental groundwater recharge benefits); or fields flooded for rice growing.

Wetlands that may not meet all of USACE's wetland delineation criteria are considered wetland waters of the state if, "under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation" (SWRCB 2021). Additionally, aquatic resources that USACE determines to not be waters of the United States because they lack a significant nexus to a traditional navigable water or are above the ordinary high-water mark limit of federal jurisdiction may also be considered waters of the state. If a CWA Section 404 permit is not required for a project, the RWQCB may still require a permit (waste discharge requirements) for impacts to waters of the state under the Porter–Cologne Act.

Local

Multiple Species Conservation Program Plan

The Project site is within the boundaries of the San Diego MSCP Plan (City of San Diego 1998). The MSCP Plan is a multijurisdictional habitat conservation planning program that involves USFWS, CDFW, the County of San Diego, the Cities of San Diego and Chula Vista, and other local jurisdictions and special districts. Local jurisdictions and special districts implement the MSCP Plan for their respective portions through subarea plans. The combination of the MSCP Plan and subarea plans serve as a Habitat Conservation Plan (HCP) pursuant to FESA Section 10(a)(1)(B), and as a Natural Community Conservation Plan (NCCP) pursuant to the California Natural Community Conservation Planning Act of 1991 (City of San Diego 1998).

The MSCP Plan study area encompasses 582,243 acres within the southwestern portion of San Diego County. As stated in the MSCP Plan, an objective of the MSCP is to conserve a connected system of biologically viable habitat lands in a manner that maximizes the protection of sensitive species and precludes the need for future listings of species as threatened or endangered. The MSCP Plan identifies a Multi-Habitat Planning Area (MHPA), which is the area within which the permanent MSCP Preserve is assembled and managed for its biological resources. The MHPA is defined in many areas by mapped boundaries in figures in the MSCP Plan and is also defined by quantitative targets for conservation of vegetation communities and goals and criteria for Preserve design. The MSCP Plan targets 171,917 acres within the MHPA for conservation (City of San Diego 1998).

A total of 85 plant and animal species are "covered" by the MSCP Plan. The MSCP Plan Final EIR/Environmental Impact Statement (City of San Diego 1997) identifies "Vegetation Community Conservation Target Areas" for conservation by subarea (Attachment B of the MSCP Plan [City of San Diego 1998]). A total of 2,067 acres is expected to be conserved within the Santee Subarea MHPA. With approval of each subarea plan and corresponding implementing agreement, each participating local jurisdiction receives permits and/or authorization to directly impact or take MSCP Covered Species. The Covered Species include species listed as endangered or threatened

by FESA and/or CESA, as well as unlisted species. Table 3-5 in the MSCP Plan provides a list of the MSCP Covered Species, and includes specific conditions required for take authorizations (City of San Diego 1998).

Draft Santee MSCP Subarea Plan

The City of Santee has been preparing its subarea plan since the original approval of the San Diego MSCP Plan and is currently in the process of completing the Santee MSCP Subarea Plan. Although the Draft Santee MSCP Subarea Plan has not yet been approved or permitted, it is used as the guidance document for projects occurring within the City of Santee. The current Draft Santee MSCP Subarea Plan seeks coverage for up to 23 species, and relies on a combination of hardline conservation areas, criteria-based upland standards areas, San Diego River conservation opportunities areas, and City-owned preserve lands to protect species and habitat (City of Santee 2023). Coverage for species is dependent on a number of factors, including multijurisdictional participation, adequate building of the Preserve system, adequate protection of certain populations, permanent management funding, and other factors.

The Draft Santee MSCP Subarea Plan Preserve boundaries are a result of the City of Santee's efforts to refine and expand the MHPA boundaries, to better define conservation priorities within the City of Santee, and to formulate an HCP under the MSCP Plan. Because the Draft Santee MSCP Subarea Plan is still in development, portions of the subarea plan may still change, including hardline Preserve areas and Covered Species. The Project site is entirely outside of the Preserve areas identified in the Draft Santee MSCP Subarea Plan (City of Santee 2023). However, as shown in Figure 1 of the BTR for this Project (see Appendix C of this Draft EIR), the Project site is adjacent to Preserve areas associated with the San Diego River corridor, as identified in the Draft Santee MSCP Subarea Plan (City of Santee 2023).

4.3.3 Thresholds of Significance

The significance criteria used to evaluate Project impacts to biological resources are based on CEQA Guidelines Appendix G. Potential Project-related impacts analyzed in this section account for biological resources that occur or have the potential to occur on the Project site. According to CEQA Guidelines Appendix G, a significant impact related to biological resources would occur if the Project would:

A. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
B. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
C. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
D. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
E. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

F. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.3.4 Impacts 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 Wildlife or U.S. Fish and Wildlife Service?

Direct Impacts

Less-than-Significant Impact with Mitigation Incorporated. No special-status plant or wildlife species were observed within the Project site during surveys, and due to lack of habitat, none are expected to occur. Therefore, no direct impacts would occur to special-status plant or wildlife species with Project implementation.

Direct impacts to nesting birds, specifically nesting bird habitat, protected under Section 3503 of the California Fish and Game Code, could occur within areas of the Project site mapped as non-native woodland or within the existing ornamental trees as part of the current development's landscaping. Project implementation of Mitigation Measure (**MM**) **BIO-1** (Pre-Construction Nesting Bird Survey) would reduce potential direct impacts to nesting birds to a less-than-significant level through performance of a nesting bird survey if construction occurs during the nesting season. Additionally, all trees removed as part of Project implementation, that could potentially provide nesting habitat for birds, would be replaced as directed by **MM-BIO 4**, which is required as part of Threshold E, below. Therefore, with implementation of mitigation, direct impacts to nesting birds or their habitat would be less than significant.

The Project site does not occur within federally designated critical habitat for plant or wildlife species. Therefore, no direct impacts would occur to critical habitat with Project implementation.

Indirect Impacts

Less-than-Significant Impact with Mitigation Incorporated. Project implementation has the potential to result in indirect impacts to special-status wildlife species, specifically least Bell's vireo, yellow-breasted chat, and yellow warbler, as well as special-status plant species occurring within 500 feet of the Project site.

Construction-Related: Potential short-term or temporary indirect impacts to least Bell's vireo, yellow-breasted chat, yellow warbler, and special-status plant species resulting from construction activities include the release of chemical pollutants; adverse effects from noise, vibration, and increased human presence; and night-time lighting. These potential construction-related indirect impacts would be potentially significant absent mitigation.

Project implementation of **MM BIO-1** (Pre-Construction Nesting Bird Survey) would reduce potential indirect impacts from construction noise to a less-than-significant level through performance of a nesting bird survey if construction occurs during the nesting season. If nesting least Bell's vireo, yellow-breasted chat, and/or yellow warbler are identified, an adequate buffer will be implemented to ensure that effects from noise, vibration, and human presence are minimized. In addition, implementation of **MM-BIO-2** (Construction-Related Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) will minimize indirect impacts to least Bell's vireo, yellow-breasted chat, yellow warbler, and special-status plant species through biological monitoring, requirement of a Worker Environmental Awareness Training that will cover the special-status resources and mitigation requirements for the Project, delineation of Project boundaries, requiring that all vehicles

and equipment be serviced in designated staging areas, and ensuring that construction will not be conducted at night. Project construction would be limited to the City's allowable construction hours of 7:00 a.m. and 7:00 p.m. and is not anticipated to require lighting. In the event that construction lighting is required, it would be properly shielded to avoid spillover effects (MM-BIO-2).

Implementation of **MM-BIO-1** (Pre-Construction Nesting Bird Survey) and **MM-BIO-2** (Construction-Related Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) would minimize the effect of construction-related indirect impacts to least Bell's vireo, yellow-breasted chat, yellow warbler, and special-status plant species to **less than significant with mitigation incorporated**.

Long-Term: Potential long-term, indirect impacts that could result from Project implementation to suitable foraging and nesting habitat for least Bell's vireo, yellow-breasted chat, and yellow warbler and special-status plants include chemical releases, such as oils and grease from vehicles that could degrade habitat; increased invasive plant species that may degrade habitat; night-time lighting; and trampling of vegetation and soil compaction by humans, which could affect soil moisture, water penetration, surface flows, and erosion. These potential long-term indirect impacts would be potentially significant absent mitigation. Because the Project site is located within the City of Santee's industrial zone, there are existing ambient noise levels that were measured by Dudek and are included in Table 2 of the Project's Noise Technical Report (Appendix K to this Draft EIR). The measured baseline outdoor ambient noise level for areas north of the Project site (i.e. occurring within the San Diego River corridor) were established to be between 50 to 56 dBA. Figures 5 and 6 of the Project's Noise Technical Report (Appendix K to this Draft EIR) show that the maximum predicted operational noise levels will be in the 35 to 45 dBA range for areas occurring north of the Project site within the San Diego River. Installation of an eight-foot-tall noise barrier along the northern perimeter of the Project site is proposed as a feature of the Project. With installation of this noise barrier, Project-related operational noise levels are predicted to be less than the current existing ambient sound levels in the areas occurring north of the Project site within the San Diego River by a factor of 5 to 21 dBA. Additionally, all operational noise levels comply with the City of Santee's noise threshold for industrial land uses and are below the 60 dBA, which is typically used as the noise threshold for wildlife species). Therefore, long-term operational noise impacts are less than significant.

The Project site currently contains sources of artificial nighttime light that are typical of a drive-in movie theatre use. In addition, streetlights are present along Wheatlands Court and North Woodside Avenue to the west, south, and east, all of which are sources of nighttime light as well. Other exterior artificial light sources in the immediate vicinity of the Project site include nearby industrial uses bordering the site to the south, east, and west. There are no existing sources of light or glare from the San Diego River abutting the Project site to the north, however, typical residential light sources in the residential neighborhood to the north of the Project site and San Diego River may be visible from the Project site. Implementation of MM-BIO-3 (Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) would minimize the effect of long-term indirect impacts from proposed lighting as it would be designed consistent with the requirements of Section 13.30.030(B) of the Santee Municipal Code, which states that lighting shall be shielded, or recessed, and directed downward and away from adjoining properties.

Implementation of **MM-BIO-3** (Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) would minimize the effect of long-term indirect impacts to least Bell's vireo, yellow-breasted chat, yellow warbler, and special-status plant species by requiring measures to ensure runoff is not altered from existing conditions and toxicants are not discharged, preparation of landscaping plans that will emphasize native species and not include species from the California Invasive Plant Council's Invasive Plant Inventory, and incorporation of barriers to prevent unauthorized public access to open space areas associated

with the San Diego River corridor. Therefore, long-term indirect impacts to special-status species would be reduced to **less than significant with mitigation incorporated**.

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?

Direct Impacts

Less-than-Significant Impact. The entire approximately 13.5-acre Project site would be directly impacted with Project implementation. Acreages for each vegetation community or land cover type permanently impacted are provided in Table 4.3-2, below, and their spatial distribution is shown in Figure 4.3-2, Impacts.

Table 4.3-2. Impacts to Vegetation Communities and Land Covers within the Project Site

Vegetation Community/ Land Cover Type	Holland/Oberbauer Code	Permanent Impact (Acres)
Non-Native Grassland	42200	0.27
Non-Native Woodland	79000	0.51
Disturbed Habitat	11300	0.02
Urban/Developed	12000	12.70
	Total	**13.49**

Note: Totals may not sum due to rounding.

A total of approximately 13.5 acres would be permanently impacted with Project implementation (see Figure 4.3-2). No riparian habitat would be impacted with Project implementation. Communities listed by CDFW as high priority for inventory (i.e., State Rank [S] 1, 2, or 3) are considered sensitive and typically require mitigation (CDFW 2023). There are no sensitive vegetation communities with CDFW state rankings of 1, 2, or 3 within the Project site. Permanent impacts to non-native grassland would typically require mitigation to comply with regional MSCP conservation goals (City of San Diego 1998). However, because the Project's impact to non-native grassland is very minimal (0.27 acres) and this vegetation community is highly disturbed and dominated by annual forb species, impacts to non-native grassland would be **less than significant** and no mitigation measures are required.

Indirect Impacts

Less-than-Significant Impact with Mitigation Incorporated. Project implementation has the potential to result in indirect impacts to sensitive vegetation communities occurring adjacent to the Project site.

Construction-Related: Sensitive vegetation communities may be indirectly impacted during construction of the proposed Project. Potential short-term or temporary indirect impacts to sensitive vegetation communities resulting from construction activities include inadvertent spillover impacts, including unintentional clearing, trampling, or grading outside of the Project footprint; generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; the release of chemical pollutants; and the adverse effect of invasive plant species. These potential construction-related, indirect impacts to sensitive vegetation communities would be potentially significant absent mitigation.

Implementation of **MM-BIO-2** (Construction-Related Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) would minimize the effect of construction-related indirect impacts to sensitive vegetation communities to **less than significant with mitigation incorporated**.

Long-Term: Potential long-term, indirect impacts that could result from development near sensitive vegetation communities include chemical releases, such as oils and grease from vehicles that could degrade habitat; increased invasive plant species that may degrade habitat; and trampling of vegetation and soil compaction by humans, which could affect soil moisture, water penetration, surface flows, and erosion. These potential long-term indirect impacts to sensitive vegetation communities would be potentially significant absent mitigation.

Implementation of **MM-BIO-3** (Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) would minimize the effect of long-term indirect impacts by requiring measures to ensure runoff is not altered from existing conditions and toxicants are not discharged, preparation of landscaping plans that will emphasize native species and not include species from the California Invasive Plant Council's Invasive Plant Inventory, and incorporation of barriers to prevent unauthorized public access to open space areas associated with the San Diego River corridor. Therefore, long-term indirect impacts to sensitive vegetation communities would be reduced to **less than significant with mitigation incorporated**.

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?

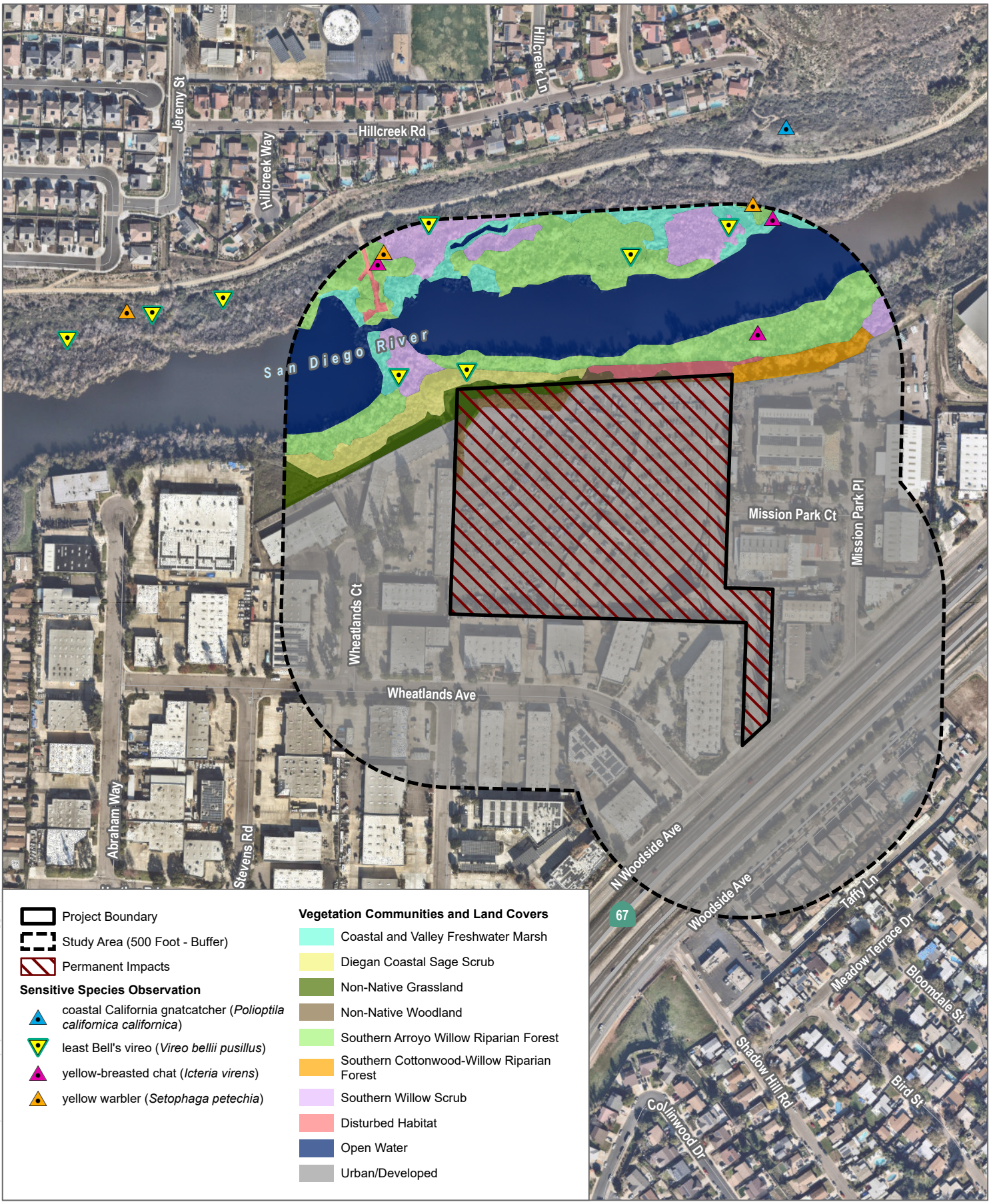
Direct Impacts

No Impact. No jurisdictional aquatic resources, including state or federally protected wetlands, occur within the Project site. The edge of the Project site occurs at least 20 to 30 feet in elevation higher than and approximately 70 to 100 feet south of the riparian (willow forest) and wetland (freshwater marsh) vegetation communities associated with the San Diego River. Therefore, no direct impacts to state or federally protected wetlands are anticipated within Project implementation and no permits under Section 401 or 404 of the Clean Water Act are required.

Indirect Impacts

Less-than-Significant Impact with Mitigation Incorporated. Project implementation has the potential to result in indirect impacts to jurisdictional aquatic resources occurring within 500 feet of the Project site associated with the San Diego River.

Construction-Related: Jurisdictional aquatic resources of the United States/state may be indirectly impacted during construction. Potential short-term or temporary indirect impacts to jurisdictional aquatic resources resulting from construction activities could include the generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; the release of chemical pollutants; and unintentional clearing, trampling, or grading outside of the proposed construction zone. Construction-related indirect impacts to jurisdictional aquatic resources would be potentially significant absent mitigation.



SOURCE: SanGIS, Open Street Maps

DUDEK

0 100 200 Feet

Figure 4.3-2

Impacts

Palisade Santee Commerce Center Project

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Implementation of **MM-BIO-2** (Construction-Related Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) would minimize construction-related indirect impacts through biological monitoring, requirement of Worker Environmental Awareness Training that will cover the special-status resources and mitigation requirements for the Project, delineation of Project boundaries, implementation of standard dust control measures, development of a Stormwater Pollution Prevention Plan, and requiring all vehicles and equipment to be serviced in designated staging areas. Therefore, construction-related indirect impacts to jurisdictional aquatic resources would be **less than significant with mitigation incorporated**.

Long-Term: Potential long-term indirect impacts that could result from development near jurisdictional aquatic resources of the United States/state include pollutants that could degrade water quality and habitat; increased invasive plant species that may degrade habitat; and trampling of vegetation and soil compaction by humans, which could affect soil moisture, water penetration, surface flows, and erosion. Long-term indirect impacts to jurisdictional aquatic resources would be potentially significant absent mitigation.

Implementation of **MM-BIO-3** (Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) would minimize long-term indirect impacts by requiring measures to ensure runoff is not altered from existing conditions and toxicants are not discharged, preparation of landscaping plans that will emphasize native species and not include species from the California Invasive Plant Council's Invasive Plant Inventory, and incorporation of barriers to prevent unauthorized public access to areas with state and federally protected waterways. Therefore, long-term indirect impacts to jurisdictional aquatic resources would be **less than significant with mitigation incorporated**.

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?

Direct Impacts

No Impact. The Project site is currently developed as a parking lot and drive-in theater and is not mapped as a core area or habitat linkage under the MSCP (City of San Diego 1998). Therefore, the Project site does not function as a wildlife corridor or habitat linkage. For these reasons, no direct impacts are anticipated to wildlife corridors and/or habitat linkages with Project implementation.

Indirect Impacts

Less-than-Significant Impact with Mitigation Incorporated. Project implementation has the potential to result in indirect impacts to the San Diego River corridor, which occurs adjacent to the Project site and may function as a local wildlife corridor.

Construction-Related: The San Diego River wildlife corridor may be indirectly impacted during construction of the proposed Project. Potential short-term or temporary indirect impacts to biological resources within the San Diego River wildlife corridor resulting from Project construction activities include inadvertent spillover impacts, including unintentional clearing, trampling, or grading outside of the Project footprint; generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; the release of chemical pollutants; and the adverse effects of invasive plant species. These potential construction-related, indirect impacts to the San Diego River wildlife corridor would be potentially significant absent mitigation.

Implementation of **MM-BIO-2** (Construction-Related Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) would minimize the effect of construction-related indirect impacts to the San Diego River wildlife corridor to **less than significant with mitigation incorporated**. Project construction would be limited to the City's allowable construction hours of 7:00 a.m. and 7:00 p.m. and is not anticipated to require lighting. In the event that construction lighting is required, it would be properly shielded to avoid spillover effects **(MM-BIO-2)**.

Long-Term: Potential long-term, indirect impacts that could result from development near the San Diego River wildlife corridor include chemical releases such as oils and grease from vehicles that could degrade habitat; increased invasive plant species that may degrade habitat; night-time lighting; and trampling of vegetation and soil compaction by humans, which could affect soil moisture, water penetration, surface flows, and erosion. These potential long-term indirect impacts to the San Diego River wildlife corridor would be potentially significant absent mitigation. Because the Project site is located within the City of Santee's industrial zone, the Project's operational noise (e.g., manufacturing, HVAC, truck loading and unloading, etc.) would not change the existing noise levels in the surrounding vicinity and all operational noise levels comply with the City of Santee's noise threshold for industrial land uses. Therefore, long-term operational noise impacts are less than significant.

The Project site contains sources of artificial nighttime light that are typical of a drive-in movie theatre use. In addition, streetlights are present along Wheatlands Court and North Woodside Avenue to the west, south, and east, all of which are sources of nighttime light as well. Other exterior artificial light sources in the immediate vicinity of the Project site include nearby industrial uses bordering the site to the south, east, and west. There are no existing sources of light or glare from the San Diego River abutting the Project site to the north, however, typical residential light sources in the residential neighborhood to the north of the Project site and San Diego River may be visible from the Project site. Implementation of MM-BIO-3 (Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) would minimize the effect of long-term indirect impacts from the Project's lighting as it would be designed consistent with the requirements of Section 13.30.030(B) of the Santee Municipal Code, which states that lighting shall be shielded, or recessed, and directed downward and away from adjoining properties.

Implementation of **MM-BIO-3** (Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources) would minimize the effect of long-term indirect impacts to the San Diego River wildlife corridor by requiring measures to ensure runoff is not altered from existing conditions and toxicants are not discharged, preparation of landscaping plans that will emphasize native species and not include species from the California Invasive Plant Council's Invasive Plant Inventory, and incorporation of barriers to prevent unauthorized public access to open space areas associated with the San Diego River corridor. Therefore, long-term indirect impacts to wildlife corridors would be reduced to **less than significant with mitigation incorporated**.

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

Less-than-Significant Impact with Mitigation Incorporated. The City of Santee's Urban Forestry Ordinance contains tree-related policies, regulations, and generally accepted standards for planting, trimming, and removing trees on public property and public rights-of-way (Santee Municipal Code, Section 8.06 [City of Santee 2020]). The ordinance gives the City of Santee control of all trees, shrubs, and other plantings in any street, park, public right-of-way, landscape maintenance district or easement, or other City-owned property. City of Santee staff review of development plans for the City-owned and maintained property would ensure that the proposed landscaping and maintenance requirements conform to the Urban Forestry Ordinance. The proposed site plan would require removal of 109 trees,

encroachment upon 24 trees, and preservation of 7 trees. As such, tree replacement would occur at a 1:1 mitigation ratio with 15-gallon trees, as directed by **MM-BIO-4**. Additionally, measures to minimize damage to the encroachment and preserved trees, as well as recommendations for long-term maintenance and care for trees that will be retained on site, would be included in the Project's Landscape Plan. Therefore, the proposed Project would comply with the Urban Forestry Ordinance, and impacts would be **less than significant with mitigation incorporated**.

In the Conservation Element of the City of Santee General Plan, biological resources are discussed, and specific objectives and policies are presented (City of Santee 2003). The proposed Project does not conflict with any objectives or policies as presented in the Conservation Element of the Santee General Plan. Therefore, impacts to local policies and ordinances would be **less than significant** and no mitigation measures are required.

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?

MSCP Plan and Draft Santee MSCP Subarea Plan

Less-than-Significant Impact. The Project site is within the boundaries of the MSCP Plan (City of San Diego 1998). The Draft Santee MSCP Subarea Plan would serve as an HCP under the MSCP Plan pursuant to Section 10(a)(1)(B) of FESA, and as an NCCP pursuant to the California Natural Community Conservation Planning Act of 1991. The Draft Santee MSCP Subarea Plan, once finalized, will contribute to the regional MSCP for preservation, mitigation for impacts, and conservation of sensitive biological resources within San Diego County. The Draft Santee MSCP Subarea Plan is also intended to provide cumulative mitigation for impacts to Covered Species within the City of Santee's jurisdiction, as long as projects are consistent with and covered by provisions of the Santee MSCP Subarea Plan, and to ensure sufficient biological resources are conserved to assist in the conservation and recovery of Covered Species under the MSCP.

Although the Draft Santee MSCP Subarea Plan has not yet been approved or permitted, it is used as the guidance document for projects occurring within the City of Santee. All Project impacts would occur outside of the Draft Santee MSCP Subarea Plan Preserve area. However, as shown in Figure 1 of the BTR for this Project (see Appendix C of this Draft EIR), the Project site is adjacent to Preserve areas associated with the San Diego River corridor as identified in the Draft Santee MSCP Subarea Plan. **MM-BIO-2** and **MM-BIO-3** are proposed to prevent any indirect impacts to special-status species, sensitive vegetation communities, and jurisdictional aquatic resources associated with the San Diego River Preserve. Furthermore, Project implementation would not conflict with the provisions of the MSCP Plan or Draft Santee MSCP Subarea Plan, nor would it prevent the Draft Santee MSCP Subarea Plan from being approved or compromise continued implementation of the MSCP in San Diego County. Therefore, impacts related to HCPs would be **less than significant** and no mitigation measures are required.

4.3.5 Mitigation Measures and Level of Significance After Mitigation

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 Wildlife or U.S. Fish and Wildlife Service?

Areas of the Project site mapped as non-native woodland or existing ornamental trees could potentially provide nesting habitat for birds protected under Section 3503 of the California Fish and Game Code. If construction occurs

during the nesting bird season, a pre-construction nesting bird survey could reduce potential direct impacts to nesting birds. Implementation of MM-BIO-1 would reduce impacts to a less than significant level. Additionally, all trees removed as part of Project implementation would be replaced as directed by MM-BIO-4, as required under Threshold E.

Potential short-term or temporary indirect impacts to least Bell's vireo, yellow-breasted chat, yellow warbler, and special-status plant species resulting from construction activities include the release of chemical pollutants; adverse effects from noise, vibration, and increased human presence; and night-time lighting. Implementation of MM-BIO-2 would reduce impacts to a less than significant level.

Potential long-term, indirect impacts that could result from Project implementation to suitable foraging and nesting habitat for least Bell's vireo, yellow-breasted chat, and yellow warbler and special-status plants include chemical releases, such as oils and grease from vehicles that could degrade habitat; increased invasive plant species that may degrade habitat; and trampling of vegetation and soil compaction by humans, which could affect soil moisture, water penetration, surface flows, and erosion. Implementation of MM-BIO-3 would reduce impacts to a less than significant level.

MM-BIO-1 Pre-Construction Nesting Bird Survey. Construction within all potential nesting resource areas within the Project site (i.e., non-native woodland areas and ornamental trees) and areas of the Project site within 500 feet of the San Diego River should be avoided during the migratory bird nesting season (typically January 1 through September 30). If construction activities (i.e., grading, tree removal, external construction involving heavy equipment generating noise in excess of 60dBA (leq)) must occur during the bird nesting season, an avian nesting survey of all potential nesting resource areas (e.g., non-native woodland areas and ornamental trees) within the Project site and areas of the San Diego River within 500 feet of all impact areas must be conducted to determine the presence/absence of special-status species, protected migratory birds, and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 14 days prior to the start of construction and one more survey pass within 24 hours of initiation of construction activities in accordance with the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5, and 3513. If construction activities are on hold for more than 30 days, then pre-construction surveys would need to be reinitiated. If an active bird nest is found, the nest shall be flagged and mapped on the construction plans, along with an appropriate buffer established around the nest, which will be determined by the biologist based on the species' sensitivity to disturbance (typically 300 feet for passerines and 500 feet for raptors and special-status species), existing nearby conditions (e.g., natural habitat versus roads or existing noisy activities), existing buffering features (e.g., topography, tall and dense trees, buildings), legal status of species (i.e., listed versus non-listed), general sensitivities of the species (e.g., disturbance tolerant or urban versus non disturbance tolerant), and other variables. The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. On-site construction monitoring shall also be conducted when an active nest buffer is in place. No Project activities shall encroach into established buffers without the consent of a monitoring biologist. The buffer shall remain in place until it is determined that the nestlings have fledged and the nest is no longer active.

MM-BIO-2 Construction-Related Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources. Prior to approval of grading plans and issuance of a grading permit, construction plans and conditions of approval shall include the

following to address potential indirect impacts to special-status species occurring within all suitable habitat associated with the San Diego River corridor (i.e., within 500 feet of the Project site):

- **Biological Monitoring.** A qualified Project biologist approved by the City of Santee shall monitor ground-disturbing and vegetation clearing activities for the duration of the Project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat, species of concern, and other sensitive biological resources outside the Project footprint. Once ground-disturbing and vegetation clearing activities are complete, the Project biologist shall conduct weekly checks to inspect construction fencing and ensure that all applicable requirements from the mitigation measures are being upheld.
- **Worker Environmental Awareness Training**. Prior to grading, a pre-construction meeting shall be required that includes a training session for Project personnel by a qualified biologist. The training shall include (1) a description of the species of concern and its habitats; (2) the general provisions of the applicable regulations pertaining to biological resources, including the Endangered Species Act and the Clean Water Act; (3) the need to adhere to the provisions of the Endangered Species Act, the Clean Water Act, and other applicable regulations; (4) the penalties associated with violating the provisions of the Endangered Species Act, Clean Water Act, and other applicable regulations; (5) the general measures that are being implemented to conserve the species of concern as they relate to the Project; and (6) the access routes to and Project site boundaries within which the Project activities must be accomplished. Additionally, the training shall include the measures and mitigation requirements for the applicable resources. Copies of the mitigation measures and any required permits from the resource agencies shall be made available to construction personnel.
- **Delineation of Property Boundaries.** Before beginning activities that would cause impacts, the contractor shall, in consultation with the biological monitor, clearly delineate the boundaries with fencing, stakes, or flags, consistent with the grading plan, within which the impacts will take place. All impacts outside the fenced, staked, or flagged areas shall be avoided, and all fencing, stakes, and flags shall be maintained until the completion of impacts in that area. In addition, any avoided environmental resources shall be clearly delineated. Prior to implementing construction activities, the biological monitor shall verify that the flagging clearly delineates the construction limits and any sensitive environmental resources to be avoided.
- **Standard Dust Control Measures**. Standard dust control measures as per the San Diego County Air Pollution Control District shall be implemented to reduce impacts on nearby plants and wildlife. Measures include controlling speed to 15 miles per hour or less on unpaved roads, replacing ground cover in disturbed areas as quickly as possible, frequently watering active work sites, installing shaker plates, and suspending excavation and grading operations during periods of high winds.
- **Stormwater Pollution Prevention Plan.** Prior to issuance of a grading permit for construction, the applicant shall submit a Stormwater Pollution Prevention Plan (SWPPP) to the City of Santee that specifies best management practices to prevent all construction pollutants from contacting stormwater, with the intent of keeping sedimentation or any other pollutants from moving off site and into receiving waters. The requirements of the SWPPP shall be incorporated into design specifications and construction contracts. Best management practice categories employed on site shall include erosion control, sediment control, and non-stormwater good

housekeeping. Best management practices recommended for the construction phase shall include, but not be limited to, the following:

- Limiting grading to the minimum area necessary for construction, operation, and decommissioning of the Project.
- Limiting vegetation disturbance/removal to the maximum extent practicable.
- Implementing fiber rolls and sandbags around drainage areas and the site perimeter.
- Stockpiling and disposing of demolition debris, concrete, and soil properly.
- Installing a stabilized construction entrance/exit and stabilizing disturbed areas.
- Installing proper protections for fueling and maintaining equipment and vehicles.
- Managing waste, aggressively controlling litter, and implementing sediment controls.
- Stabilizing soil in disturbed areas through revegetation.

The following water quality measures shall be included in the SWPPP:

- Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.
- The Project shall be designed to avoid the placement of equipment and personnel within the stream channel or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern, as feasible. Project activities that cannot be conducted without placing equipment or personnel in sensitive habitats shall be timed to avoid the breeding season of riparian species.
- Water pollution and erosion control plans shall be developed and implemented in accordance with the Regional Water Quality Control Board.
- **Minimize Spills of Hazardous Materials.** All vehicles and equipment shall be maintained in proper condition to minimize the potential for fugitive emissions of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. Hazardous spills shall be immediately cleaned up and the contaminated soil shall be properly handled and disposed of at a licensed facility. Servicing of construction equipment shall take place only at a designated staging area. The staging area will be located on the south side of the Project site, away from the San Diego River, and no stockpiles will be allowed adjacent to the San Diego River corridor.
- **Wildlife Hazards.** The following measures shall be implemented to ensure that wildlife do not become trapped, entangled, injured, or poisoned by construction activities:
  - Structures in which wildlife may become trapped (e.g., open pipes, pits, trenches) shall be tightly covered at the end of each work day. If covering the structure is not possible, an escape ramp shall be provided to allow any wildlife that falls in to safely escape.
  - Debris piles, construction materials, equipment, and other items that may be used as wildlife refuge shall be inspected for wildlife at the start of each work day and prior to disturbance. If wildlife is discovered, it shall either be moved out of harm's way by a qualified biologist or allowed to move off of the Project site on its own.
  - Nets and mesh shall be made of loose weave material that is not fused at the intersections of the weave because nets with welded weaves present an entanglement risk.
  - Toxic materials and garbage shall be removed from the work site and safely stored or disposed of at the end of each work day.

- **Invasive Weeds.** To reduce the spread of invasive plant species, landscape plants shall not be on the most recent version of the California Invasive Plant Council's Invasive Plant Inventory (http://www.cal-ipc.org/ip/inventory/index.php).
- **Night Work**. All construction activities shall be conducted during the daytime, and lights shall not be kept on overnight in the construction area, as practicable. If night lighting is required during construction activities, all exterior lighting along undeveloped land shall be fully shielded and directed downward in a manner that will prevent light spillage or glare into the adjacent open space.

MM-BIO-3 Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources. Prior to approval of grading plans and issuance of a grading permit, construction plans and conditions of approval shall include the following to address potential indirect impacts to special-status species occurring within all suitable habitat associated with the San Diego River corridor (i.e., within 500 feet of the Project site):

- **Runoff:** Future development within 500 feet of suitable habitat for special-status species shall incorporate measures, including measures required through the National Pollutant Discharge Elimination System, to ensure that the quantity and quality of runoff discharged is not altered in an adverse way when compared with existing conditions. In particular, measures such as an infiltration system designed to capture and treat stormwater pollutants, consistent with commercial/industrial developments and associated parking lots, and including oil, grease, metals, trash, and debris, shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into proposed open space or suitable habitat for special-status species. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials, or other elements that might degrade or harm biological resources or ecosystem processes. This can be accomplished using a variety of methods, including natural detention basins, grass swales, or mechanical trapping devices. Regular maintenance shall occur to ensure effective operation of runoff control systems.
- **Lighting:** Project lighting would be designed consistent with the requirements of Section 13.30.030(B) of the Santee Municipal Code. Night lighting shall be directed away from proposed open space and/or suitable habitat for special-status species to protect species from direct night lighting. Shielding, including use of light controlling devices such as light guards, shall be incorporated in Project designs to ensure that ambient lighting is not increased.
- **Invasive Species:** Landscape Plans shall incorporate native species that occur in the region. Invasive, non-native plant species listed on the most recent California Invasive Plant Council's Invasive Plant Inventory (https://www.cal-ipc.org/plants/inventory/) with a rating of moderate or high shall not be included in landscaping.
- **Barriers:** The proposed Project shall incorporate barriers, where appropriate, to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping in open space and/or suitable habitat for special-status wildlife (e.g. San Diego River corridor). Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage, and/or other appropriate mechanisms.

MM-BIO-4 Tree Replacement, Encroachment, and Preservation. Prior to approval of grading plans and issuance of a grading permit, construction plans, conditions of approval, and the Project's

Landscape Plan shall include the following to address tree removal, encroachment into protected zone, and retained trees:

- **Replacement:** The proposed site plan would require removal of 109 trees. Tree replacement shall occur at a 1:1 mitigation ratio with 15-gallon trees and be included in the Project's Landscape Plan, which shall also include recommendations for long-term maintenance and care for regulated trees that will be retained on site.
- **Encroachment into Protected Zone and Retained Trees:** The Project would encroach upon 24 trees and preserve 7 trees. As such, the recommendations provided in the Tree Protection Measures from the Arborist Report for the Palisade Santee Commerce Center Project (prepared by Dudek in April 2023) designed to mitigate impacts from construction encroachment into the protected zone of the preserved and encroached upon trees shall be implemented. These Tree Protection Measures are consistent with best management practices for tree protection on construction sites and would help minimize impacts to preserved and encroached trees. These measures shall be implemented prior to, during, and following construction. This includes measures such as exclusion fencing and worker training to avoid direct impacts to trees, and measures such as irrigation and monthly inspections by a certified arborist to promote the long-term health of retained trees.

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?

No direct impacts to riparian habitat would occur with Project implementation, and no mitigation measures are required. Direct impacts would occur to 0.27 acres of non-native grassland, which is considered a sensitive vegetation community under the Draft Santee MSCP Subarea Plan. However, because the impact area is minimal (0.27 acres) and the community within the Project site is highly disturbed and dominated by annual forb species, impacts to sensitive vegetation communities would be less than significant and no mitigation measures are required.

Indirect impacts to riparian habitat or other sensitive communities would be reduced to **less than significant with implementation of MM-BIO-2 and MM-BIO-3**.

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?

No direct impacts to state or federally protected wetlands would occur with Project implementation, and no mitigation measures are required. Indirect impacts to state or federally protected wetlands would be reduced to **less than significant with implementation of MM-BIO-2 and MM-BIO-3**.

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?

No direct impacts to wildlife corridors would occur with Project implementation, and no mitigation measures are required. Indirect impacts to wildlife corridors would be reduced to **less than significant with implementation of MM-BIO-2 and MM-BIO-3**.

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

The proposed site plan would require removal of 109 trees, encroachment upon 24 trees, and preservation of 7 trees. As such, tree replacement would occur at a 1:1 mitigation ratio with 15-gallon trees, as directed by **MM-BIO-4**. The proposed Project would comply with the Urban Forestry Ordinance, and impacts would be **less than significant with implementation of MM-BIO-4**.

The proposed Project does not conflict with any objectives or policies as presented in the Conservation Element of the City of Santee General Plan (City of Santee 2003). Therefore, impacts to local policies and ordinances would be **less than significant** and no mitigation measures are required.

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?

MM-BIO-2 and MM-BIO-3 are proposed to prevent any indirect impacts to special-status species, sensitive vegetation communities, and jurisdictional aquatic resources associated with the San Diego River as identified in the Draft Santee MSCP Subarea Plan (City of Santee 2023). Furthermore, Project implementation would not conflict with the provisions of the MSCP Subregional Plan or Draft Santee MSCP Subarea Plan, nor would it prevent the Draft Santee MSCP Subarea Plan from being approved or compromise continued implementation of the MSCP in San Diego County. Therefore, impacts to HCPs would be **less than significant** and no mitigation measures are required.

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4.4 Cultural, Tribal Cultural, and Paleontological Resources

This section describes the existing cultural (archaeological and built environment), tribal cultural, and paleontological resources conditions of the Palisade Santee Commerce Center Project (Project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if needed to reduce or avoid significant impacts, related to implementation of the Project.

In addition to the documents incorporated by reference (see Section 2.7 of Chapter 2 of this EIR), the following analysis is based, in part, on the following sources:

- Archaeological Resources Inventory Report, prepared by Dudek in December 2023 (Appendix E)
- Historical Assessment Of The 10990 North Woodside Avenue Property Santee, California 92071 prepared by Scott A. Moomjian, Esq., Historic Property Consultant ("Historical Assessment") in March 2025 (Appendix F)
- Geotechnical Engineering Investigation, prepared by NorCal Engineering in March 2024 (Appendix G)
- Paleontological Resources Memorandum, prepared by Dudek in May 2024 (Appendix H)

4.4.1 Existing Conditions

4.4.1.1 Study Area

The Property contains a former drive-in theatre/motion picture (film) complex, previously known as the “Santee Drive-In Theatre,” (the “Former Drive-In Theatre “), which was originally built in 1962 and expanded in 1976. The site largely consists of eight (8) main components: two (2) drive-in motion picture screens (Screen #1 and Screen #2); one (1) Concessions Building; two (2) parking lots (one for each movie screen); two (2) Ticket Booths; and one (1) Entrance Sign.

The motion picture screens, and parking lots, are located along the northwest and southeast property elevations; the Concessions Building is located toward the center of the property, the Ticket Booths are located along the east elevation of the parcel, and the Entrance Sign is located toward the southeast elevation. Today, the site serves as an open, surface parking lot and site for the Santee Swap Meet, which operates on weekends.

The Property is located in a built, suburban environment along North Woodside Avenue, in the City of Santee, California. It is bounded by the San Diego River to the north, the former drive-in driveway to the east and west, and by Wheatlands Avenue to the west. The area in and around the Property includes industrial uses, while residential development exists just north of the San Diego River. State Route (SR) 67 is also located south of the Property.

The surrounding neighborhood was largely developed beginning around the 1960s. Such development has continued to the present day. The original neighborhood setting in and around the Property generally consisted of open, undeveloped land, as well some with agricultural uses. Over the years, the surrounding area has experienced substantial change, particularly with the construction of newer and larger residential development, as well as the remodeling of existing buildings. Commercial and industrial uses have also proliferated throughout the area. Overall, architectural styles in and around the Property are generally Modern and/or Contemporary, expressed in a vernacular or utilitarian nature.

4.4.1.2 Historic Setting

Historical Overview of the City of Santee

The City of Santee is located in eastern San Diego County. As described in Appendix F, the area was called several different names before it became known as "Santee" in 1893. Originally, the land was inhabited by the Kumeyaay tribe of Native Americans who resided on the banks of the San Diego River in the village of "Sinyeweche" (the present-day area of "Santee"). The Kumeyaay dominated the land until the arrival of the Spanish in 1779. At the direction of Father Junipero Serra, the Kumeyaay constructed the Old Mission Dam for the nearby Mission de Alcala. During this period, the land was divided among the Spanish soldiers as payment for their services, and the Native Americans were gathered to live at the Mission. In 1822, the Mission system was disbanded by the Mexican government and during the 1840s, American settlers arrived in California.

In 1870, George A. Cowles migrated to California from Florida. In 1877, he purchased 4,000 acres of land in the Santee area, in which he planted vineyards, pomegranate and magnolia trees. At this time, the Cuyamaca Railroad ran through the area and the local station became known as "Cowles Station" due to its proximity to the vineyard and orchards owned by Cowles. The surrounding area soon became known as "Cowleston."

After the death of George Cowles death in 1887, his wife, Jennie, married realtor and surveyor, Milton Santee. Several years later, Jennie Cowles Santee named the early post office "Santee," and by 1893, the town name was changed to Santee. Similarly, the Cowles School, established in 1891, and the Cowles School District subsequently changed their names to Santee as well.

In 1885, Hosmer P. McKoon purchased 9,543 acres of land in the Santee area for his "Fanita Ranch" (named after his wife, Fannie). However, over the next few years McKoon sold segments of the ranch to new arrivals, including 7,000 acres to the Scripps family in 1898. The Scripps used the ranch to raise cattle and built a country resort for their family. Like much of the rest of San Diego County during this period, Santee's economy was based in agriculture and ranching. Farms, such as the Edgemoor Stock Farm (established in 1908), drove the local economy and contributed to the city's rural identity. In 1914, the opening of the Panama Canal resulted in an increase in shipping ports in San Diego County that led to more growth in the surrounding areas. However, little growth came to San Diego during the early twentieth century.

In 1941, the United States' entry into the Second World War increased military activity on the West Coast and brought new development to Santee during the 1940s. The federal government used 2,300 acres of the Fanita Ranch as military training grounds, and the Marine Corps Base, Camp Pendleton, was established north of Santee. The wartime demand for manufacturing transformed San Diego County's industry and it became home to various aircraft and ship manufacturing as well as military training.

During the mid-twentieth century, Santee's economy increased, and the city became home to a variety of industries. After the war, Santee's agricultural industry had significantly decreased, and it began to suburbanize. Residential development in the area was built for military and worker housing during World War II, and the population rapidly increased. In 1967, the Las Colinas Detention Facility opened as a juvenile facility, and in 1979, it was converted to an adult women's institution to serve as the primary facility for women prisoners in San Diego County. The establishment of the detention center introduced employment opportunities in the local area and served as a catalyst for further population growth. Such rapid growth created concern about the character of the community, so Santee residents created the San Diego County Santee Citizen's Planning Committee. The committee was officially recognized by the San Diego County Board of Supervisors in December 1968, and it has continued to serve

as a local land-use and planning advisory board to the county planning commission and the Board of Supervisors. In 1974, the Committee secured approval of the Santee Community Plan which acted as the area's General Plan until the Santee General Plan was adopted in 1984. In 1980, the citizens of Santee voted to incorporate in order to gain local control over the development of their city, and the creation of the General Plan was their first goal.

Santee's rapid population increase resulted in the need for more recreation and entertainment services. In 1974, two regional parks were established in the city-- Mission Trails Regional Park and Santee Lakes Regional Park. Additionally, more commercial development and entertainment venues followed. During the late twenty-first century, much of Santee's economy has focused upon the hospitality and entertainment sectors, as well as health care assistance, retail trade, and educational services. Since the 1980s, the City has continued to grow, reaching a population of approximately 54,000 residents in 2020. Since this time, Santee has worked toward protecting and enhancing the San Diego River, expanded its park system, and boasts major commercial centers.

Santee Drive-In Theater

As described in Appendix F (Historical Assessment Report), historical research indicates that the property on which the Former Drive-In Theatre is today was acquired by partners John Elliot Forte and Walt Long in 1958. Inspection of a 1953 historic aerial photograph of the property indicates that it was originally part of a larger agricultural area. Forte and Long labored on the construction of the drive-in for approximately four years before its grand opening on September 26, 1962. The identities of the designer, architect, and/or builder could not be ascertained. The facility was advertised as "California's Newest, Most Modern Drive-In Theatre" with an opening night that featured a sky diving exhibition before a screening of "The Horizontal Lieutenant" with Jim Hutton, Paula Prentiss, and Jack Carter, and "Ride The High Country" with Randolph Scott and Joel McCrea. Sometime between 1964-1967, the drive-in site also operated as the "Santee Swap Meet," once a week (on Sunday) during the day. In addition, during the mid-1970s, the Property became the subject of controversy by showing X-rated films to the public.

Inspection of a 1964 historic aerial photograph depicts the Property as a developed site with an unpaved driveway leading north from Woodside Avenue, then jogging west toward an unpaved, rectangular parking lot. A parking lot with semi-circular rows of sloped parking spaces and mounted speakers, and Screen #1, is visible at the northwest corner of the property. Similarly, the Entrance Sign is visible along the driveway, and a rectangular-shaped building, the Concessions Building, is visible at the center of the property. By 1966, no discernable changes are visible to the site. From 1966 onward, the Property and the surrounding area display no ascertainable changes until 1971.

In 1971, the southeastern half of the Property and the driveway leading from North Woodside Avenue appear to have been paved with sloping parking spots arranged in semi-circular rows, while the northwestern half of the property remained unpaved. By 1978, the Property had been entirely paved and the parking orientation divided and rearranged to accommodate the addition of Screen #2 at the southeastern corner of the Property. Parking for each screen was oriented in semi-circular rows of sloping parking spaces facing the direction of each respective screen. Fencing around the southwest side of the Property had delineated the parking lots for each of the screens. In addition, the Property included an addition to the northern portion of the site, and a driveway with two ticket booths had been constructed along the east boundary of the parcel. The driveway and ticket booths support a new entry orientation, turning the previous entrance into an exit. Historic aerial photographs from 1978 onward indicate that the Property had not experienced any substantial modifications or alterations.

Between 1962-2020, Forte and Long owned the Property, although Long and his son, Mike, managed the drive-in together. In 2020, the Long family retired, and management of the Property was subsequently taken over by the Forte family. The Former Drive-In Theatre on the Property continued under the operation of the Forte family until it

closed on December 31, 2023. Historical research was unable to identify any further information related to the Long and Forte families.

4.4.1.3 Cultural Resources

This section presents information gathered during the cultural resources and paleontological resources inventory efforts in support of the Project (see Appendices E and H of this EIR for additional details). Section 4.4.2, Relevant Plans, Policies, and Ordinances, provides background information on the federal, state and local regulations and requirements related to these resources.

Previously Conducted Cultural Resources Studies

The records search results revealed that 82 previous cultural resources studies have been conducted within a one-mile radius of the Project area. Of the 82 previous studies, four studies intersect the Project area. These studies consist of a regional archaeological survey, two archaeological resources inventory reports, and an extended phase I and phase II testing and evaluation report. Overall, approximately 10% of the Project area has been subject to previous cultural resources investigations. All intersecting studies have resulted in negative findings within the overlapping portions of the Project area. The results of this records search are attached as part of Confidential Appendix A of Appendix E.

Previously Recorded Cultural Resources

The SCIC records search did not identify any cultural resources within the Project area, though it did identify 20 cultural resources within a one-mile radius of the Project area. Of the 20 resources identified within the one-mile radius, twelve are prehistoric resources, six are historic resources, and two are multicomponent resources. Additionally, two historic addresses, one with multiple historic structures, were recorded within the one-mile radius of the Project area, but do not intersect it. The results of this records search and all DPR forms are attached as part of Confidential Appendix A of Appendix E to this Draft EIR.

Archival Research

In addition to the SCIC records search, Dudek conducted an online review of Bureau of Land Management (BLM) General Land Office Records, historical topographic (topo) maps, and historic aerial photographs to understand the development of the Project area and surrounding properties over time. The Project area was first recorded within Lot No. 37 of The Rancho El Cajon Land Grant in an 1883 original survey for the BLM by William H. Brown (BLM 2023). Historic topo maps of the Project area are available from 1893 to 1996 (USGS 2023). The first historic topo from 1883 shows the Project area within the natural path of the San Diego River. South of the Project area there is an established roadway and railway running roughly parallel to the San Diego River on a northeast to southwest axis. The surrounding areas remain undeveloped. There is little change within the Project area and its immediate surroundings as depicted in the historic topos until 1939. By then, it appears that the San Diego River has been diverted to the north of the Project area. By 1955, an established dirt road is shown running through the center of the Project area on a north to south axis. Although additional development appears to the south, the Project area remains undeveloped. By 1964, the Project area has been developed into a drive-in theatre. The historic topo shows a single structure in the middle of the Project area with an established road leading up to it from Riverford Road (now Woodside Avenue N.). There are two additional structures to the east of the Project area, and a residential community to the southeast, across SR-67. Although there is additional development within the surrounding areas over the next 20 years as depicted in the historic topos, the Project area remains unchanged (USGS 2023).

Historic aerial photographs (historic aerials) of the Project area are available from 1953 to 2020 and provide more detail on the historic development of the subject property and surrounding properties through time (NETR 2023). The earliest historic aerial from 1953 shows the Project area as irrigated cropland with an established dirt road running through it on a north to south axis. The San Diego Riverbed lies to the north of the Project area, and there are several structures to the south with frontage on Woodside Avenue N. By 1964, the Project area has been developed into a drive-in theatre and appears to be predominantly a dirt parking lot. There is a single structure in the middle of the Project area and a screen in the northwest corner of the Project area. Additionally, there appears to be a dirt road leading from the front of the Project area out to Woodside Avenue N. The northernmost portion of the project area abutting the San Diego Riverbank remains undeveloped. By 1968, an established pathway appears along the northern boundary of the Project area running parallel to the riverbank, while the remaining Project area remains unchanged. It is not until 1978 that the Project area appears to have been entirely paved over and the parking area has been rearranged to accommodate an additional screen, located opposite the first, in the southeast corner. There also appears to be another structure along the eastern boundary of the Project area. The Project area displays no discernible changes since the 1978 historical aerial photograph (NETR 2023).

Cultural Resources Pedestrian Survey

Dudek archaeologist Matthew DeCarlo and Red Tail Environmental Native American Monitor Natasha Eggan conducted a site visit of the proposed Project area on March 31, 2023. The site visit employed standard archaeological procedures and techniques consistent with the Secretary of the Interior Standards. When possible, 15-meter interval survey transects were conducted oriented in cardinal direction. Where the ground surface was visible, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as rodent/reptile burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials.

The Project area is flat and almost completely developed, consisting predominantly of paved parking areas, structures associated with the Santee Drive-In Theatre, and some minor landscaping. Only the northernmost portion of the Project area along the San Diego Riverbank was unpaved. Within the unpaved portion of the Project area, ground visibility was high because the southern bank of the San Diego River had been terraced and is level with minimal vegetation. Modern debris (e.g., refuse, plastic fragments, irrigation pipes, glass fragments) were strewn throughout this northern portion of the Project area. The pedestrian survey did not identify any archaeological resources within the Project area. The Santee Drive-in Theatre and its associated structures were noted as existing within the Project area during the pedestrian survey.

Native American Coordination

Native American Heritage Commission Sacred Lands File Search

Dudek requested an NAHC search of the Sacred Lands File (SLF) for the Project area on March 13, 2023. The SLF consists of a database of known Native American resources. These resources may not be included in the SCIC database. The NAHC replied via email on March 28, 2023, stating that the SLF search was completed with positive results. Positive results indicate the presence of Native American cultural resources within one-mile of the Project area, and not necessarily directly within the Project area. Additionally, the NAHC provided a list of 20 Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge

of cultural resources in the area. Tribal outreach letters were mailed on April 5, 2023, to all Native American group representatives included on the NAHC contact list (Appendix B). These letters attempted to solicit information relating to Native American resources that may be impacted by Project implementation. Native American representatives were requested to define a general area where known resources intersect the Project area. To date, Dudek has received one response to this information request. This response is paraphrased below:

> Bernice Paipa of the Sycuan Band of the Kumeyaay Nation Cultural Resource Center and Museum (Sycuan Band) responded on April 13, 2023. Ms. Paipa's response indicated that the Project area is within the boundaries the Sycuan Band considers their Traditional Use Area and is near known locations of Kumeyaay cultural resources. No specific locational information or descriptions were provided. Ms. Paipa requests that a qualified Kumeyaay Cultural Monitor be on site for any surveys, site visits or ground disturbing activities.

Assembly Bill 52 Consultation

The Project is subject to compliance with Assembly Bill (AB) 52 (California Public Resources Code [PRC] Section 21074), which requires consideration of impacts to Tribal Cultural Resources (TCRs) as part of the CEQA process and requires the lead agency to notify any tribal groups (who have requested notification) of the proposed Project. Pursuant to AB 52, the City of Santee (City) sent Project notification letters on September 15, 2023, to tribal representatives of the Jamul Indian Village, Mesa Grande Band of Mission Indians, and Barona Band of Mission Indians inviting each tribe to engage in tribal consultation, if desired. The communications with the contacted tribes did not result in the identification of any TCRs. Because AB 52 is a government-to-government process including consultation regarding sensitive information, all records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City.

Paleontological Setting

The paleontological resources memorandum (Appendix H) was prepared in July 2023 and revised in May 2024 to determine the paleontological conditions and sensitivity of the Project site. The Project site lies within the Peninsular Ranges Geomorphic Province (California Geological Survey 2002). This province extends from the tip of the Baja California Peninsula to the Transverse Ranges (the San Gabriel and San Bernardino Mountains) and includes the Los Angeles Basin, offshore islands (Santa Catalina, Santa Barbara, San Nicholas, and San Clemente), and continental shelf. The eastern boundary is the Colorado Desert Geomorphic Province (California Geological Survey 2002; Morton and Miller 2006). The ancestral Peninsular Ranges were formed by uplift of plutonic igneous rock resulting from the subduction of the Farallon Plate underneath the North American Plate during the latter portion of the Mesozoic era (approximately 90 to 125 million years ago [mya]) (Abbott 1999).

Todd (2004) mapped the geology of the El Cajon 7.5-minute Topographic Quadrangle map, which includes the Project site, at a scale of 1:24,000. According to this mapping, the Project site is mapped as Holocene to late Pleistocene (< 11,700 years ago to approximately 129,000 years ago; Cohen et al. [2023]) Quaternary alluvium and colluvium undivided deposits (map unit Qu), which generally consists of silty graded fine to medium grained sand with silt, and clay. The geotechnical report prepared for the Project, documented in their boring logs asphalt, fill, and the silty sand with occasional gravel for the first two feet and the alluvium and colluvium starting at a depth of three feet to approximately 50 feet below the ground surface, which was the maximum depth explored.

Holocene to Pleistocene alluvial and colluvial deposits generally have low paleontological sensitivity at the surface because of their young age; however, because the age of sediments increases with depth below the ground surface,

the paleontological sensitivity may increase from the surface to the subsurface, where middle Holocene (approximately 5,000 years ago) to Pleistocene sediments can be found.

A paleontological records search request covering the Project site and a one-mile radius buffer was sent to the San Diego Natural History Museum (SDNHM) on April 7, 2023, and the results were received on April 21, 2023. According to the records search results, no paleontological localities are documented within the Project site boundaries and there were no documented localities within the one-mile buffer area surrounding the Project site. The SDNHM indicated that the Holocene to late Pleistocene deposits present on the surface of the Project site are likely underlain by early Cretaceous (approximately 126 mya) intrusive igneous rocks that have no paleontological sensitivity. Therefore, a paleontological mitigation program was not recommended.

Geotechnical Report Review

The geotechnical report, *Geotechnical Engineering Investigation Proposed Industrial Warehouse Development* (Appendix G), was prepared in March 2024 to determine the geotechnical conditions of the Project area. The report details the results of subsurface explorations at nine locations that fall within the Project site to determine subsurface conditions. According to the report, 9 hollow-stem auger borings were completed to depths between 5 and 50 feet below ground surface. Artificial fill soils encountered during subsurface testing are described as brown, fine to coarse grained, silty sand with occasional small gravel. The native soils encountered during borings are described as light brown, medium to coarse grained, sand to a brown fine to coarse grained, slightly silty to silty sand. The report concludes that artificial fills soils were observed in depths ranging from 1 to 2 feet below ground surface and underlain by alluvium (Appendix G).

4.4.2 Relevant Plans, Policies, and Ordinances

Federal

National Historic Preservation Act

Federal protection of cultural resources is legislated by (a) the National Historic Preservation Act (NHPA) of 1966 as amended by 16 U.S. Code 470, (b) the Archaeological Resource Protection Act of 1979, and (c) the Advisory Council on Historical Preservation. These laws and organizations maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP).

Section 106 of the NHPA and accompanying regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the main federal regulatory framework guiding cultural resources investigations and requires consideration of effects on properties that are listed in, or may be eligible for listing in the NRHP. The NRHP is the nation's master inventory of known historic resources. It is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, and cultural districts that are considered significant at the national, state, or local level.

- The formal criteria (36 CFR 60.4) for determining NRHP eligibility are as follows:
- The property is at least 50 years old (however, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);
- It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and

- It possesses at least one of the following criteria:
  A. Association with events that have made a significant contribution to the broad patterns of history (events).
  B. Association with the lives of persons significant in the past (persons).
  C. Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture).
  D. Has yielded, or may be likely to yield, information important to prehistory or history (information potential).

Listing in the NRHP does not entail specific protection or assistance for a property but it does guarantee recognition in planning for federal or federally assisted projects, eligibility for federal tax benefits, and qualification for federal historic preservation assistance. Additionally, project effects on properties listed in the NRHP must be evaluated under CEQA.

The National Register Bulletin also provides guidance in the evaluation of archaeological site significance. If a heritage property cannot be placed within a particular theme or time period, and thereby lacks "focus," it is considered not eligible for the NRHP. In further expanding upon the generalized National Register criteria, evaluation standards for linear features (such as roads, trails, fence lines, railroads, ditches, flumes, etc.) are considered in terms of four related criteria that account for specific elements that define engineering and construction methods of linear features: (1) size and length; (2) presence of distinctive engineering features and associated properties; (3) structural integrity; and (4) setting. The highest probability for NRHP eligibility exists within the intact, longer segments, where multiple criteria coincide.

State

California Register of Historical Resources

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code Section 5020.1(j)). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code Section 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, enumerated below. According to California Public Resources Code Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

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

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and cultural resources:

- California Public Resources Code Section 21083.2(g) defines "unique archaeological resource."
- California Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a) define "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource." It also defines the circumstances when a project would materially impair the significance of an historical resource.
- California Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- California Public Resources Code Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(b).) If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code Section 5024.1(q)), it is a "historical resource" and is presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines

Section 15064.5(b)(1); California Public Resources Code Section 5020.1(q)). In turn, CEQA Guidelines Section 15064.5(b)(2) states the significance of an historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any "historical resources," then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (California Public Resources Code Section 21083.2[a], [b], and [c]).

California Public Resources Code Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (California Public Resources Code section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as tribal cultural resource (California Public Resources Code Section 21074(c), 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC Section 5097.98.

California Health and Safety Code

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery,

no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5b). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the Native American Heritage Commission (NAHC) within 24 hours (Section 7050.5c). The NAHC will notify the most likely descendant. With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of being granted access to the site. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the Project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding Project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

Local

City of Santee General Plan Conservation Element

The City of Santee does not maintain a local register of historic resources. As a result, the Property was not evaluated under local significance criteria. Nevertheless, the City of Santee General Plan serves to guide the City's future development. This is accomplished through objectives and policies that serve as a long-term guide for physical, economic, and environmental growth. The Conservation Element of the Santee General Plan addresses water resources, land resources, archaeological and cultural resources, biological resources, and open space.

Section 4.3 of the Conservation Element discusses archaeological, cultural, and historic resources known to be within the City, and does not include the Former Drive-In Theatre on the Property. The goal of the Conservation Element is to conserve open space, natural, and cultural resources.

According to Conservation Element Objective 8.0 (Preserve significant cultural resources) and Policy 8.1, the City "shall require either the preservation of significant historic or prehistoric sites, or the professional retrieval of artifacts prior to the development of a site, consistent with the provisions of the California Environmental Quality Act. Preservation may include various measures including avoidance, preservation in place, incorporation into open space, or covering or capping. The type of preservation would depend upon the nature and significance of the archaeological resource and the practical requirements of the proposed land use."

In this manner, evaluation of the Property in accordance with National and California Register significance criteria, as well under CEQA with proposed mitigation measures, achieves consistency with the City of Santee General Plan.

In addition, the City of San Diego has published a San Diego Modernism Historic Context Statement ("Modernism Context Statement"). The Modernism Context Statement is used regionally to "assist in the identification, evaluation and preservation of significant historic buildings, districts, sites and structures associated with the Modernism movement in San Diego from 1935 to 1970." Although the City of Santee has not formally adopted the Modernism Context Statement, it serves as a regional tool by which to evaluate Modernist resources within the City.

The Modernism Context Statement is appropriate for use in evaluating the potential historic significance of the Property because:

A. The Modernism Context Statement was intended to guide evaluations within the region rather than being restricted to San Diego City limits. The Modernism Context Statement was prepared by the City of San Diego utilizing Federal funds from the National Park Service, Department of the Interior, through the California Office of Historic Preservation (OHP) as a regional and local tool to evaluate Modern Architecture in the San Diego.
B. The Modernism Context Statement is the most regionally specific guide for evaluating Modern Architecture. There are no alternative guides or documents that offer better or more specific guidance than this one for evaluating Modern Architecture in the San Diego region.

4.4.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to cultural, tribal cultural, and paleontological resources are based on CEQA Guidelines Appendix G. According to CEQA Guidelines Appendix, a significant impact related to cultural, tribal cultural, and paleontological resources would occur if the Project would:

A. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.
B. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
C. Disturb any human remains, including those interred outside of dedicated cemeteries.
D. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with

cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

E. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

F. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.4.4 Impact Analysis

A. Would the Project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?

Significant and Unavoidable Impact. According to CEQA Guidelines §15064.5(a)(3), a lead agency can find a resource historic under CEQA if the resource has been determined to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the determination is supported by substantial evidence in light of the whole record. CEQA Guidelines §15064.5(a)(3) provides that generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (California Public Resources Code §5024.1), including where the resource embodies the distinctive characteristics of a type, period, region, or method of construction. As explained in the Historic Assessment (Appendix F), the Former Drive-In Theatre has been determined to qualify as a historic resource because it embodies the distinctive characteristics of a type, period, and method of drive-in movie theatre construction during the 1960s-1970s while remaining largely unaltered since its original construction. It was not possible to identify any precedent indicating that a drive-in theater possessing the aforementioned elements and maintaining its original integrity would not qualify as such. While it may be theoretically possible to find an alternative determination, the absence of relevant precedent necessitated a conservative finding that this Property does, in fact, constitute a historical resource under CEQA (CEQA Guidelines §15064.5(a)(3).)

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1).) Based on the foregoing conservative assumptions, the demolition of the Former Drive-In Theatre would result in a substantial adverse change in the significance of an historic resource under CEQA. Because the Project's impact would not be reduced below significance threshold, even with implementation of **MM-HIS-1, MM-HIS-2, MM-HIS-3, and MM-HIS-4**, the Project's historic resource impact would remain **significant and unavoidable**.

B. Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Less-than-Significant Impact with Mitigation Incorporated. Dudek's archaeological resources inventory of the Project site indicates that there is moderate potential for the inadvertent discovery of archaeological resources during Project implementation. Although the SCIC records search and the site visit did not identify any archaeological resources within the Project area, there are 20 cultural resources within a one-mile radius of the Project area. Additionally, the NAHC has indicated that known Native American cultural resources are in the vicinity of the Project area. Due to this and the Project's proximity to the bank of the San Diego River, there is an increased potential that Project associated ground disturbance would have the potential to impact unanticipated archaeological resources. For this reason, the Project site should be treated as potentially sensitive for archaeological resources, and Mitigation Measures (MM-) **MM-CUL-1** is required to reduce potential impacts to unanticipated archaeological resources. With incorporation of **MM-CUL-1**, impacts associated with archaeological resources would be **less than significant**.

C. Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Less-than-Significant Impact with Mitigation Incorporated. No prehistoric or historic burials were identified within or immediately adjacent to the Project site as a result of the CHRIS records search, NAHC Sacred Lands File search, or pedestrian survey. Moreover, the Project site is not part of a dedicated cemetery and as such, the likelihood of disturbing human remains is low. However, the possibility of encountering human remains within the Project site exists. In the unexpected event that human remains are unearthed during construction activities, impacts would be potentially significant. However, in the unlikely event that human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98, pursuant to **MM-CUL-2**. The County Coroner must be notified of the inadvertent discovery immediately. If the remains are determined to be Native American, the County Coroner will notify the NAHC, which will determine and notify an MLD. With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of being granted access to the site. The MLD will have the opportunity to offer recommendations for the disposition of the remains. With incorporation of **MM-CUL-2**, impacts associated with human remains would be **less than significant**.

D. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Less-than-Significant Impact. As part of the *Archeological Resources Inventory Report* (Appendix E), records of the California Historical Resources Information System (CHRIS) and Sacred Lands File (SLF) were reviewed in March 2023. The CHRIS records search included a review of previously identified prehistoric, historical, and built-environment resources; Department of Parks and Recreation (DPR) site records; technical reports; archival resources; and ethnographic references. Additional consulted sources include an online review of Bureau of Land Management (BLM) General Land Office Records, historical topographic (topo) maps, and historic aerial photographs to understand the development of the Project area and surrounding properties over time. The NAHC has indicated that known Native American cultural resources are in the vicinity of the Project area. However, no

TCRs have been identified by California Native American tribes as part of the City's AB 52 notification and consultation process. Impacts are considered **less than significant**. No mitigation is required.

E. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less-than-Significant Impact with Mitigation Incorporated. There are no resources on the Project site that have been determined by the City to be significant pursuant to the criteria set forth in PRC Section 5024.1. Further, no TCRs were identified in the Project site by California Native American tribes as part of the City's AB 52 notification and consultation process.

No responses to the AB 52 outreach letters to tribal contacts were received by the City requesting consultation. Although information regarding TCRs has been received by the City, the archaeological sensitivity of the Project site is considered to be moderate. For this reason, the Project site should be treated as potentially sensitive for archaeological resources, and Mitigation Measures (MM-) **MM-CUL-1** is required to reduce potential impacts to unanticipated discovery of cultural resources and TCRs. Implementation of **MM-CUL-1** would reduce the significance of impacts associated with any potential buried, currently unrecorded/unknown tribal cultural resources to a level of **less than significant**.

F. Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less-than-Significant Impact with Mitigation Incorporated. No paleontological resources were identified within the Project site as a result of the institutional records search, and desktop geological and paleontological review, and the Project site is not anticipated to be underlain by unique geologic features (see Appendices G and H of this EIR). Areas of the Project site underlain by Holocene to Pleistocene alluvial and colluvial deposits have low paleontological sensitivity but may increase at depth. In the event that intact paleontological resources are located beneath the Project site, ground-disturbing activities associated with construction of the Project, such as grading during site preparation and large diameter drilling (more than 2 feet diameter), have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. With implementation of **MM-CUL-3**, impacts related to unanticipated discovery of paleontological resources would be reduced to **less than significant.**

4.4.5 Mitigation Measures and Level of Significance After Mitigation

A. Would the Project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?

As a resource which has been conservatively determined to be significant on the basis of its design/construction, the Former Drive-In Theatre on the Property is conservatively determined herein to be eligible for listing in the National Register of Historic Places and the California Register of Historical Resources and is therefore

conservatively assumed to be a historical resource under CEQA for purposes of environmental review of the Project under CEQA. Since the Project proposes demolition of the Former Drive-In Theatre on the Property, including its structures and parking lots, this undertaking has been conservatively assumed to cause a substantial adverse change in the significance of a historical resource under CEQA.

The below feasible mitigation measures have therefore been recommended to preserve the history and architectural significance of the Former Drive-in Theatre. In this context, recordation of the history of the Former Drive-In Theatre serves a legitimate archival purpose. However, the following mitigation measures will not reduce the impact of the proposed demolition of the Former Drive-In Theatre on the Property to a less-than-significant level under CEQA. Therefore, the impact would remain **significant and unavoidable** under CEQA.

MM-HIS-1 Prior to the issuance of a demolition permit, the Applicant shall submit a Historic American Buildings Survey (HABS) Level II to the City of Santee for review and approval. This mitigation measure will provide an in-depth record of the Property's current state, including high-resolution photographs, detailed architectural drawings, and text explaining the drawings and photographs. The (HABS) Level II survey will help preserve a visual and documented history of the Property that may otherwise be lost after demolition. The submitted documentation not only serves to memorialize the Property for future generations but also allows for a future public appreciation of the Property's significance within the community.

The HABS documentation shall explicitly illustrate the significance of the Santee Drive-In Theatre for archival purposes, as specified below. The HABS will be made available for archival storage to the San Diego County Public Library, the San Diego History Center, and the City of Santee. The HABS shall include the following:

A. ***Drawings.*** The HABS documentation shall include measured drawings, including Site Plan, Elevations, and known Construction Details prepared for the following structures/objects: Entrance Sign; Concessions Building; Movie Screens; and Ticket Booths.

B. ***Photographs.*** The HABS documentation shall include professional-quality photographic documentation of the Entrance Sign; Concessions Building; Movie Screens; and Ticket Booths prior to any construction on the Property. The photographs should be 35-millimeter black-and-white photographs; 4x6-inch standard format; taken of all four structure/object exterior elevations; and be of archival quality and easily reproducible. Once the HABS documentation is deemed complete, one set of original HABS photographs shall be submitted for archival storage to the San Diego County Public Library, the San Diego History Center, and the City of Santee.

C. ***Written History and Description***. The HABS documentation shall include a written history and description of the Santee Drive-In Theatre, developed in accordance with standards and format meeting the Department of the Interior's National Park Service requirements. The history will begin with a statement of significance supported by the development of the architectural and historical context in which the site was originally constructed and subsequently evolved. The written history will also include an architectural description and bibliographic information. The written history and description will also include a methodology section specifying the name of the researcher, date of research, and sources consulted.

MM-HIS-2 Interpretative Display. Prior to the issuance of the certificate of occupancy for the Project, the Applicant shall work with the City of Santee to create an approximately 24-inch by 48-inch metal

plaque or display outlining the history of the Santee Drive-In Theatre, including events and activities associated with the site.

The Applicant shall submit a plan to the City showing the location, size and content of the Interpretive Display. Upon request, the interpretive material shall be made available to schools, museums, archives and curation facilities, libraries, nonprofit organizations, the public, and other interested agencies. Prior to issuance of the certificate of occupancy for the Project, the Interpretive Display shall be installed by the Applicant on the Property or at the new location of the Entrance Sign, as described below. If the Interpretive Display is located on the Property, the Applicant shall record a covenant indicating that the property owner is responsible for implementing the long-term management of the Interpretive Display. If, at the City's discretion, the Interpretive Display is located on off-site property owned by the City, the City shall assume long-term management of the Interpretive Display.

The interpretive display is intended to be placed near the final location of the Entrance Sign, which, as described under Mitigation Measure MM-HIS-3, will either be preserved on-site or relocated to an off-site location. By situating the interpretative display in proximity to the Entrance Sign, the public will be able to gain a deeper understanding of the significance of the Santee Drive-In Theatre, its role in the community, and its history while enjoying the visual backdrop of the Entrance Sign. The combination of the interpretive display and the Entrance Sign will provide visual interest to the community while providing a written context to serve as an educational resource for the community.

MM-HIS-3 Rehabilitation & Relocation of the Entrance Sign. The City and the Applicant may mutually agree to either preserve the Entrance Sign on the Property or relocate it to a City-owned property within the Arts and Entertainment neighborhood. Prior to the issuance of a demolition permit for the Project, the Applicant shall submit a plan to the City of Santee for approval to rehabilitate and temporarily store the Entrance Sign, which consists of the neon tubing outlining the word "Santee," the neon star, and the marquee. The plan, which is to be approved by the City, shall include information and details related to the rehabilitation, temporary storage and ultimate location of the Entrance Sign. Rehabilitation and storage of the Entrance Sign will be undertaken by the Applicant in a manner consistent with the Secretary of the Interior's Standards or other applicable industry standards . If the Entrance Sign is located on the Property, the Applicant shall record a covenant indicating that the property owner is responsible for implementing the long-term management of the Entrance Sign. If the Entrance Sign is located on off-site property owned by the City, the City shall assume long-term management of the Entrance Sign. If the City elects to require the Applicant to place the Entrance Sign and/or interpretative display on a City-owned off-site property, and the City, despite the Applicant's commercially reasonable efforts and through no fault of the Applicant, fails to provide the necessary authorization for the Applicant to begin the relocation of the Entrance Sign prior to the issuance of a Certificate of Occupancy for the project, the City shall not withhold the issuance of the Project's Certificate of Occupancy. Prior the issuance of a Certificate of Occupancy, the City and the Applicant shall mutually determine to reinstall the rehabilitated Entrance Sign at an appropriate location on the project site that is visible to the public from Woodside Avenue with recordation of a covenant by the Applicant indicating that the property owner is responsible for implementing the long-term management of the Entrance Sign. Alternatively, the City and the Applicant shall mutually determine an extended temporary storage plan for the sign with a security

from the Applicant to complete the relocation after issuance of the Certificate of Occupancy or an Applicant provided funding mechanism for the City to complete this work.

The Entrance Sign is one of the most recognizable visual elements of the Santee Drive-In Theatre. Preserving this sign as a tangible, physical object ensures that the history of the Drive-In Theatre remains in order to be appreciated and viewed by the public. The Entrance Sign will provide a direct nexus to the history of the Drive-in Theatre and as outlined in Mitigation Measure MM-HIS-2, and the Entrance Sign will be complemented by an Interpretive Display. Together, the Entrance Sign and the Interpretive Display will provide historical context, detailing the Drive-In Theatre's history.

MM-HIS-4 Historical Preservation Funding. In the event the Interpretive Display and Entrance Sign are relocated to City property, the City will be responsible for the long-term management of the Interpretive Display and Entrance Sign. Accordingly, if the Interpretive Display and Entrance Sign are located on City property or moved off of the Project site, after the Applicant completes the rehabilitation, storage, and relocation, the Applicant shall provide a donation to the City of Santee in the amount of $7,500 (seven thousand five hundred dollars) which is intended to fund the long-term management of the interpretive display and Entrance Sign by the City.

B. Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

The Project would result in potentially significant impacts with regard to a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. With incorporation of MM-CUL-1, impacts associated with archaeological resources would be **less than significant with mitigation incorporated**.

MM-CUL-1 In order to mitigate impacts to cultural resources to a level that is less than significant, procedures for proper treatment of unanticipated archaeological finds must comply with the California Environmental Quality Act (CEQA) Guidelines. Adherence to the following requirements during initial earth-disturbing activities will assure the proper treatment of unanticipated archaeological or Native American cultural material:

1. An archaeological monitor and a Kumeyaay Native American monitor shall be present full-time during all initial ground-disturbing activities. If proposed project excavation later present evidence suggesting a decrease in cultural sensitivity, the monitoring schedule can be reduced pending archaeological, Native American, and City consultation.
2. In the event that there is an unanticipated discovery of potentially significant archaeological resources, the archaeological monitor, Native American monitor, construction or other personnel shall have the authority to divert or temporarily halt ground disturbance operations within at least 50 feet (dependent on characteristics of the discovery) in the area of the find. Construction activities may continue in other areas but should be redirected a safe distance from the find. The archaeological monitor shall evaluate and minimally document isolates and clearly non-significant deposits in the field. If the discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. A data recovery plan shall be developed by the qualified archaeologist in consultation with the City and Native American representatives, if applicable. Ground

disturbance can continue only after the resources has been properly mitigated and with approval by the City.

C. Would the Project disturb any human remains, including those interred outside of formal cemeteries?

The Project would result in potentially significant impacts associated with the disturbance of human remains, including those interred outside of formal cemeteries. With incorporation of MM-CUL-2, impacts associated with human remains would be **less than significant with mitigation incorporated**.

MM-CUL-2 In order to mitigate impacts to human remains to a level that is less than significant, procedures for proper treatment of unanticipated discoveries must comply with the California Environmental Quality Act (CEQA) Guidelines. In the event of discovery of unanticipated human remains, personnel shall comply with Public Resources Code Section 5097.98, CEQA Section 15064.5, and Health and Safety Code Section 7050.5 during earth-disturbing activities:

1. If any human remains are discovered, the construction personnel or the appropriate representative shall contact the County Coroner and the City. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted by the property owner or their representative in order to determine proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the Most Likely Descendant regarding their recommendations as required by California Public Resources Code Section 5097.98 has been conducted. California Public Resources Code Section 5097.98, CEQA Section 15064.5 and Health & Safety Code Section 7050.5 shall be followed.

D. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Impacts would be **less than significant**. No mitigation is required.

E. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Incorporation of MM-CUL-1 would ensure impacts would be **less than significant**.

F. Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Incorporation of MM-CUL-3 would ensure impacts would be **less than significant**.

MM-CUL-3 Inadvertent Discovery. Prior to ground-disturbing activities, the qualified paleontologist shall be retained and prepare a WEAT (worker environmental awareness training). The paleontologist, or their designee, shall present the WEAT for the construction crew members informing them of the potential to inadvertently encounter paleontological resources and the proper procedures to be enacted in the event of an inadvertent discovery. The WEAT may be done during a pre-construction meeting or morning tailboard safety meeting as long as it is done prior to ground disturbance. 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. The applicant shall ensure that construction personnel attend the training and sign an attendance acknowledgement form. The applicant shall retain documentation demonstrating attendance. The qualified paleontologist shall observe all initial ground disturbing activities including grading and excavation. In the unlikely event that paleontological resources (i.e., fossils) are exposed during construction activities, all construction work occurring within 50 feet of the find shall immediately stop and the lead agency representative contacted. The qualified paleontologist shall review the unanticipated find to determine the significance. If the discovery proves potentially significant under CEQA as determined by the qualified paleontologist, and the area cannot be feasibly avoided, paleontological monitoring may be warranted at the discretion of the qualified paleontologist.

4.5 Energy

This section describes the existing energy conditions of the Palisade Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to implementation of the Project.

In addition to the documents incorporated by reference (see Section 2.7 of Chapter 2 of this EIR), the following analysis is based, in part, on the following source:

- *Air Quality and GHG Emissions Technical Report*, prepared by Dudek in March 2025 (Appendix B).

4.5.1 Existing Conditions

Electricity

According to the U.S. Energy Information Administration, California used approximately 250,379 gigawatt-hours (GWh) of electricity in 2019 (EIA 2020a). Electricity usage in California for different land uses varies substantially by the types of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices in a building. By sector in 2017, commercial uses accounted for 46% of the state's electricity use, followed by 35% for residential uses, and 19% for industrial uses (EIA 2019). Due to the state's energy efficiency building standards and efficiency and conservation programs, California's electricity use per capita in the residential sector is lower than any other state except Hawaii (EIA 2020b).

San Diego Gas and Electric Company (SDG&E) provides electric services to 3.7 million customers through 1.49 million electric meters located in a 4,100-square-mile service area that includes San Diego County and southern Orange County (SDG&E 2022). According to the California Public Utilities Commission (CPUC), SDG&E customers consumed approximately 19,045 million kilowatt-hours (kWh) of electricity in 2020 (CPUC 2022).

SDG&E receives electric power from a variety of sources. In 2021, 55% of SDG&E's power came from eligible renewable energy sources, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources (CPUC 2022).

Updated electricity demand forecasts show that electricity consumption in California is increasing at an accelerating rate, fueled in part by California's efforts to decarbonize the transportation and building sectors by switching from fossil fuels to electricity. Statewide electricity sales were more than 290,000 GWh in 2021 and are forecasted to be just under 302,000 GWh in 2035 (CEC 2023).

In San Diego County, the California Energy Commission (CEC) reported an annual electrical consumption of approximately 7.4 billion kWh in 2020 for residential use (CEC 2020).

Natural Gas

CPUC regulates natural gas utility service for over 11 million customers who receive natural gas from Pacific Gas & Electric, Southern California Gas (SoCalGas), SDG&E, Southwest Gas, and several smaller natural gas utilities. CPUC also regulates independent storage operators Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage (CPUC 2022). SDG&E provides natural gas service to San Diego County and Orange County and would provide natural gas to the proposed project. SDG&E is a wholesale customer of SoCalGas and currently receives all of its natural gas from the SoCalGas system (CPUC 2023).

The majority of California's natural gas customers are residential and small commercial customers (core customers). These customers accounted for approximately 35% of the natural gas delivered by California utilities. Large consumers, such as electric generators and industrial customers (noncore customers), accounted for approximately 68% of the natural gas delivered by California utilities (CPUC 2023).

CPUC regulates California natural gas rates and natural gas services, including in-state transportation over transmission and distribution pipeline systems, storage, procurement, metering, and billing. Most of the natural gas used in California comes from out-of-state natural gas basins (CPUC 2023).

CEC reports that SDG&E consumed a total of approximately 50.5 trillion British thermal units (Btu) of natural gas in 2020, including 14.7 trillion Btu for commercial buildings, 2.2 trillion Btu for industrial buildings, and 30.2 trillion Btu for residential use (CEC 2022a). In San Diego County, total natural gas consumption was approximately 50.5 trillion Btu in 2020, with 20.2 trillion Btu for nonresidential use and 30.3 trillion Btu for residential use (CEC 2022b).

Petroleum

According to the U.S. Energy Information Administration, California used approximately 681 million barrels of petroleum in 2018, with the majority (584 million barrels) used for the transportation sector (EIA 2021). This total annual consumption equates to a daily use of approximately 1.9 million barrels of petroleum. There are 42 U.S. gallons in a barrel, so California consumes approximately 78.4 million gallons of petroleum per day, adding up to an annual consumption of 28.7 billion gallons of petroleum. By sector, transportation uses account for approximately 85.5% of the state's petroleum use, followed by 11.1% from industrial uses, 2.5% from commercial uses, 0.9% from residential uses, and 0.01% from electric power uses (EIA 2018). Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. California has implemented policies to improve vehicle efficiency and to support use of alternative transportation, which are described in Section 4.5.2, below. As such, CEC anticipates an overall decrease of gasoline demand in the state over the next decade.

Existing Infrastructure

The approximately 13.5-acre Project site is developed with a drive-in theatre that includes two movie screens, two ticket booths, and a building containing restrooms and a snack bar. Electric service is currently provided by SDGE and several above ground and underground electrical lines are located adjacent to the Project site and adjacent streets. Several SDGE poles would be removed and replaced as part of the Project. There is currently no gas service to the Project site, and the Project does not include plans to install new gas service.

4.5.2 Relevant Plans, Policies, and Ordinances

Federal

Energy Policy and Conservation Act

In 1975, Congress enacted the federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 Federal Register [FR] 62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of intermodal transportation systems to maximize mobility and address national and local interests in air quality and energy. ISTEA contained factors that metropolitan planning organizations were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, metropolitan planning organizations adopted policies defining the social, economic, energy, and environmental values guiding transportation decisions.

Transportation Equity Act for the 21st Century

The Transportation Equity Act for the 21st Century was signed into law in 1998 and builds on the initiatives established in the ISTEA legislation, discussed above. The act authorizes highway, highway safety, transit, and other efficient surface transportation programs. The act continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of transportation decisions. The act also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of intelligent transportation systems to help improve operations and management of transportation systems and vehicle safety.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased Corporate Average Fuel Economy standards for motor vehicles, the EISA includes the following provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

This federal legislation requires ever-increasing levels of renewable fuels (the RFS) to replace petroleum (EPA 2022). The U.S. Environmental Protection Agency (EPA) is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that lay the foundation for achieving significant reductions in greenhouse gas (GHG) emissions, including the use of renewable fuels, reducing petroleum importing, and encouraging the development and expansion of the renewable fuels sector in the United States. The updated program is referred to as “RFS2” and includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel and set separate volume requirements for each one.

- EISA required the EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Federal Vehicle Standards

In 2007, the Bush Administration issued Executive Order (EO) 13432, directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011. In 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016 (75 FR 25324–25728).

In 2010, President Barack Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of carbon dioxide (CO_2) in model year 2025 on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021 (77 FR 62624–63200). On January 12, 2017, the EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light-duty trucks (EPA 2022).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018 (76 FR 57106–57513). The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6% to 23% over the 2010 baselines.

In August 2016, the EPA and NHTSA announced the adoption of the final phase two program for fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018–2027 for certain trailers and model years 2021–2027 for semitrucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion MT and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).

In August 2018, EPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light-duty trucks and establish new standards for model years 2021–2026. Compared to maintaining the post-2020 standards now in place, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2% to 3% of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of 1 degree Celsius by 2100 (EPA and NHTSA 2018).

In 2019, the EPA and NHTSA published the Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program (SAFE-1), which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. In March 2020, Part Two was issued, which set CO_2 emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021–2026. In March 2022, EPA reinstated California's authority under the federal Clean Air Act to implement its own GHG emission standards and zero-emission vehicle sales mandate. EPA's March 2022 action concludes its

reconsideration of the 2019 SAFE-1 rule by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and are now entirely rescinded.

State

California Environmental Quality Act

Appendix F of the California Environmental Quality Act (CEQA) Guidelines calls for discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

California Energy Commission

Senate Bill (SB) 1389 (Bowen, Chapter 568, Statutes of 2002) requires the Energy Commission to prepare an integrated energy report every two years. The report contains an integrated assessment of major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors. The report provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. CEC's Integrated Energy Policy Report (IEPR) sets forth policies that would enable the state to meet its energy needs under the carbon constraints established in the 2006 Global Warming Solutions Act. The IEPR also provides a set of recommended actions to achieve these policies. The 2022 IEPR Update provides the following recommendations (CEC 2023):

Embedding Equity and Environmental Justice at CEC

- Open an informational proceeding on equity and environmental justice to continue formal dialogue with the public.
- Check CEC progress through future IEPR proceedings on embedding equity and environmental justice.
- Hold an annual equity and environmental justice summit.
- Provide more customized support to tribes and communities.
- Secure more workforce development expertise.
- Continue a regional approach and work more consistently with local government.
- Consider a supplier diversity program.

California Energy Planning Library

- Launch the California Energy Planning Library to ensure that key data and analysis developed by the CEC are timely, transparent, and readily accessible.
- Solicit stakeholder engagement and feedback on how to continue to improve the new platform.
- Provide adequate and consistent state funding to support further development and ongoing data updates for the California Energy Planning Library

Energy Reliability

- Enacted Strategic Electricity Reliability Reserve to make additional generation and load reduction available during extreme events, including through the Demand Side Grid Support program and the Distributed

Energy Backup Assets program. Components of the Strategic Reliability were implemented quickly enough to support summer 2022.

- Preserved the option to extend Diablo Canyon Power Plant for reliability needs.
- Initiated efforts to analyze opportunities for additional reliability investments and develop a Clean Energy Reliability Investment Plan.

Role of Hydrogen in California's Clean Energy Future

- Develop an agreed-upon and standardized method to measure the climate benefits of hydrogen while accounting for varying feedstocks and production processes.
- Set targets for reducing GHG emissions from hydrogen production.
- Expand analysis of hydrogen supply adequacy and hydrogen demand for electricity.
- Fully engage in the federal Hydrogen Hub initiative.

Gasoline Cost Factors and Price Spikes

- Additional data is necessary to better understand the impact of planned and unplanned refinery outages and inventory levels on gasoline prices.
- CEC is developing a Transportation Fuels Transition Study to plan for and track progress on the state's transition away from petroleum fuels and toward a reliable, safe, equitable, and affordable transportation fuels future.

Distributed Energy Resources [DER]

- Examine how to balance the roles of DER and grid assets in making the energy transition away from fossil fuels.
- Examine the role of interconnection and how utility process reform can increase the pace of DER deployment.

Warren–Alquist Act

The California Legislature passed the Warren–Alquist Act in 1974. The Warren–Alquist Act created CEC. The legislation also incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed CEC to formulate and adopt the nation's first energy conservation standards for both buildings constructed and appliances sold in California.
- The act removed the responsibility of electricity demand forecasting from utilities, which had a financial interest in high demand projections, and transferred it to a more impartial CEC.
- CEC was directed to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as non-conventional energy sources.

State of California Energy Action Plan

CEC and CPUC approved the first State of California Energy Action Plan in 2003. The plan established shared goals and specific actions to ensure that adequate, reliable, and reasonably priced electrical power and natural gas supplies are provided, and identified policies, strategies, and actions that are cost effective and environmentally

sound for California's consumers and taxpayers. In 2005, CEC and CPUC adopted a second Energy Action Plan to reflect various policy changes and actions of the prior 2 years.

At the beginning of 2008, CEC and CPUC determined that it was not necessary or productive to prepare a new energy action plan. This determination was based in part on a finding that the state's energy policies have been significantly influenced by the passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (discussed below). Rather than produce a new energy action plan, CEC and CPUC prepared an "update" that examines the state's ongoing actions in the context of global climate change.

Senate Bill 1078 (2002)

SB 1078 established the California Renewables Portfolio Standard (RPS) Program and required that a retail seller of electricity purchase a specified minimum percentage of electricity generated by eligible renewable energy resources as defined in any given year, culminating in a 20% standard by December 31, 2017. These retail sellers include electrical corporations, community choice aggregators, and electric service providers. The bill relatedly required CEC to certify eligible renewable energy resources, design and implement an accounting system to verify compliance with the RPS by retail sellers, and allocate and award supplemental energy payments to cover above-market costs of renewable energy.

Senate Bills 107 (2006), X1-2 (2011), 350 (2015), and 100 (2018)

SB 107 (2006) accelerated the RPS established by SB 1078 by requiring that 20% of electricity retail sales be served by renewable energy resources by 2010 (not 2017). Additionally, SB X1-2 requires all California utilities to generate 33% of their electricity from eligible renewable energy resources by 2020. SB X1-2 sets a three-stage compliance period: by December 31, 2013, 20% shall come from renewables; by December 31, 2016, 25% shall come from renewables; and by December 31, 2020, 33% shall come from renewables.

SB 350 (2015) requires retail seller and publicly owned utilities to procure 50% of their electricity from eligible renewable energy resources by 2030, with interim goals of 40% by 2024 and 45% by 2027.

SB 100 (2018) accelerated and expanded the standards set forth in SB 350 by establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024; 52% by December 31, 2027; and 60% by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 also states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources eventually supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources does not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

Consequently, utility energy generation from nonrenewable resources is expected to be reduced based on implementation of the 60% RPS in 2030. Therefore, any project's reliance on nonrenewable energy sources would also be reduced.

Assembly Bill 1007 (2005)

AB 1007 (2005) required CEC to prepare a statewide plan to increase the use of alternative fuels in California (State Alternative Fuels Plan). CEC prepared the plan in partnership with the California Air Resources Board (CARB) and in consultation with other state, federal, and local agencies. The plan assessed various alternative fuels and

developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Assembly Bill 32 (2006) and Senate Bill 32 (2016)

AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. In 2016, the Legislature enacted SB 32, which extended the horizon year of the state's codified GHG reduction planning targets from 2020 to 2030, requiring California to reduce its GHG emissions to 40% below 1990 levels by 2030. In accordance with AB 32 and SB 32, CARB prepares scoping plans to guide the development of statewide policies and regulations for the reduction of GHG emissions. Many of the policy and regulatory concepts identified in the scoping plans focused on increasing energy efficiency and the use of renewable resources and on reducing the consumption of petroleum-based fuels (such as gasoline and diesel). As such, the state's GHG emissions reduction planning framework creates co-benefits for energy-related resources. Additional information on AB 32 and SB 32 is provided in Section 4.7, Greenhouse Gases, of this EIR.

California Building Standards

Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and nonresidential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically to incorporate and consider new energy efficiency technologies and methodologies.

The current Title 24, Part 6 standards, referred to as the 2019 Title 24 Building Energy Efficiency Standards, became effective on January 1, 2020. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy due to energy efficiency measures than those built to the 2016 standards; once rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards will use approximately 53% less energy than those under the 2016 standards (CEC 2018a). Nonresidential buildings built to the 2019 standards are anticipated to use an estimated 30% less energy than those built to the 2016 standards (CEC 2018a).

Title 24 also includes Part 11, the California Green Building Standards (CALGreen). CALGreen establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The 2019 CALGreen standards are the current applicable standards. Title 24 categorizes residential buildings that are four or more habitable levels as high-rise residential rather than mid-rise. High-rise residential is included in the nonresidential section of Title 24 and therefore is subject to the nonresidential code rather than the residential code. For nonresidential projects, some of the key mandatory CALGreen 2019 standards (which the project is subject to) involve requirements related to bicycle parking, designated parking for clean air vehicles, electric vehicle charging stations, shade trees, water-conserving plumbing fixtures and fittings, outdoor potable water use in landscaped areas, recycled water supply systems, construction waste management, excavated soil and land-clearing debris, and commissioning (24 California Code of Regulations Part 11).

The 2022 standards will improve upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. CEC updates the Title 24 Energy Code every 3 years. CEC adopted the 2022 Title 24 Energy Code in August 2021, and the California Building Standards Commission approved incorporating the updated code into the California Building Standards Code (CALGreen) in December 2021. The

2022 Energy Code went into effect on January 1, 2023. When compared to the 2019 Title 24 Standards, the 2022 amendments include measures that will further reduce energy use in single-family, multifamily, and nonresidential buildings through the following strategies (CEC 2021):

- New prescriptive and performance standards for electric heat pumps for space conditioning and water heating, as appropriate for the various climate zones in California,
- Require PV [photovoltaic] and battery storage systems for newly constructed multifamily and selected nonresidential buildings,
- Updated efficiency measures for lighting, building envelope, HVAC [heating, ventilation, and air conditioning], and
- Improvements to reduce the energy loads of certain equipment covered by (i.e., subject to the requirements of) the Energy Code that perform a commercial process that is not related to the occupant needs in the building (such as refrigeration equipment in refrigerated warehouses, or air conditioning for computer equipment in data processing centers).

California's Integrated Energy Policy Report

CEC is responsible for preparing integrated energy policy reports that identify emerging trends related to energy supply, demand, and conservation; public health and safety; and maintenance of a healthy economy. CEC's 2018 IEPR discusses the state's policy goals of decarbonizing buildings, doubling energy efficiency savings, and increasing flexibility in the electricity grid system to integrate more renewable energy (CEC 2018b). Specifically, for the decarbonizing of building energy, the goal would be achieved by designing future commercial and residential buildings to have their energy sourced almost entirely from electricity in place of natural gas. Regarding the increase in renewable energy flexibility, the goal would be achieved through increases in energy storage capacity within the state, increases in energy efficiency, and adjusting energy use to the time of day when the most amount of renewable energy is being generated. Over time, these policies and trends would serve to beneficially reduce the project's GHG emissions profile and energy consumption.

Executive Order N-79-20.

EO N-79-20 sets the goal for the state that 100% of in-state sales of new passenger cars and trucks will be zero-emission by 2035. EO-N-79-20 also sets goals for transitioning to 100% zero-emission all medium- and heavy-duty vehicles by 2045, and zero-emission drayage trucks, off-road vehicles, and equipment by 2035, where feasible. Among other directives to further this EO, for passenger cars and trucks, the governor directed CARB to develop and propose regulations requiring increasing volumes of new zero-emission vehicles sold in the state to progress toward the target of 100% of in-state sales by 2035. The governor also directed the Governor's Office of Business and Economic Development to develop a Zero-Emissions Vehicle Market Development Strategy, which was completed in February 2021 (GO-Biz 2021). The EO also directs updates and assessments to ensure zero-emission vehicle infrastructure is in place to support the levels of electric vehicle adoption required by the order.

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or SB 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meet its GHG emissions reduction mandates. As codified in the California Government Code, Section 65080, SB 375 requires metropolitan planning organizations (San Diego Association of Governments) to include a sustainable communities strategy in their

regional transportation plan. The main focus of the sustainable communities strategy is to plan for growth in a fashion that will ultimately reduce GHG emissions, but the strategy is also a part of a larger effort to address other development issues within the general vicinity, including transit and vehicle miles traveled, which influence the consumption of petroleum-based fuels.

Local

SDG&E Individual Integrated Resource Plan

SDG&E's Conforming Portfolios identify a need for approximately 1,546 MW of new capacity in 2035, comprising new solar, storage, and wind resources (SDG&E 2022). SDG&E's Conforming Portfolio demonstrates that the utility is well positioned to achieve the state's climate and reliability goals, in part due to SDG&E's early compliance with RPS requirements, with around 56% of its energy mix expected from renewable resources in Compliance Period 4 (2021–2024) (SDG&E 2022). SDG&E has aggressively adopted energy storage and does not use coal resources. SDG&E is fully compliant with RPS and long-term contracting requirements. SDG&E continues its efforts to meet resource-specific renewable procurement mandates, as required, but does not expect to procure additional resources for RPS compliance purposes until after 2030.

Sustainable Santee Plan

The City adopted the Sustainable Santee Plan in December of 2019 (City of Santee 2019). The Sustainable Santee Plan serves as the City's climate action plan (CAP) with the primary purpose or goals as follows:

1. Present the City's plan for achieving sustainability by utilizing resources efficiently, reducing greenhouse gas emissions, and preparing for potential climate-related impacts.
2. Identify how the City will effectively implement this Sustainable Santee Plan by obtaining funding for program implementation and tracking and monitoring the progress of the Plan implementation over time.
3. Allow streamlined CEQA compliance for new development by preparing an Environmental Impact Report for the Plan and developing tools that provide clear guidance to developers and other project proponents
4. Maintain economic competitiveness within the region.

The Sustainable Santee Action Plan Project Consistency Checklist (Checklist) is intended to be a tool for development projects to demonstrate consistency with Santee's (City's) Sustainable Santee Action Plan, which is a qualified greenhouse gas (GHG) emissions reduction plan in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15183.5. This Checklist has been developed as part of the Sustainable Santee Action 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.

4.5.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts on energy are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to energy would occur if the Project would:

A. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

B. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.5.4 Impacts 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?

Construction

Less than Significant Impact. The proposed Project would require an approximately 15-month-long construction period. The construction phases anticipated to occur include demolition, grading, building construction and architectural coating, and paving. Heavy-duty construction equipment associated with construction activities would rely on diesel fuel, as would trucks associated with vendor and haul trips.

The amount of electricity used during construction would be minimal relative to the total power used in the region or state and typical of what is required to construct a development like the Project. Typical demand would stem from the use of electrically powered hand tools and several construction trailers by managerial staff during the hours of construction activities. Natural gas is not anticipated to be required during Project construction.

Heavy-duty construction equipment of various types would be used during each phase of construction. The CalEEMod analysis discussed in Appendix B to this EIR includes the proposed construction schedule and equipment usage. Based on that analysis, over all phases of construction, diesel-fueled construction equipment would run for an estimated 19,510 hours, as summarized in Table 4.5-1.

Table 4.5-1. Total Hours of Operation for Construction Equipment

Phase (Duration)	Hours of Equipment Use
Demolition (25 days)	1,400
Grading (24 days)	1,344
Building Construction (202 days)	13,736
Paving (60 days)	2,880
Architectural Coating (25 days)	150
Total	**19,510**

Source: Table 5 in Appendix B of this EIR.

Fuel consumption from construction equipment was estimated based on the Project's anticipated construction schedule by converting the total CO_2 emissions from each construction phase to gallons using conversion factors for CO_2 to gallons of diesel. Construction is estimated to occur over a 15-month period (2023-2024)[1] based on the CalEEMod construction phasing schedule as described in Section 4.2, Air Quality. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric

[1] At the time this Air Quality and Green House Gas modelling was initiated, the analysis assumed a construction start date of July 2023. While past, it represented the earliest date construction could have been initiated. It is assumed that the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years. Therefore, the conclusions of the analysis are more conservative than analyses prepared for later years.

ton CO_2 per gallon (The Climate Registry 2019). The estimated diesel fuel use from construction equipment is shown in Table 4.5-2.

Table 4.5-2. Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO_2 (MT)	kg CO_2/Gallon	Gallons
Demolition	7	45.60	10.21	4,466.21
Grading	8	63.10	10.21	6,180.22
Building Construction	9	219	10.21	21,449.56
Paving	6	41.30	10.21	4,045.05
Architectural Coating	1	1.52	10.21	148.87
			Total	**36,289.91**

Sources: Appendix B (pieces of equipment and equipment CO); The Climate Registry 2019 (kg/CO/gallon).
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

Fuel consumption from worker and vendor trips is estimated by converting the total CO_2 emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Worker vehicles are analyzed as being gasoline fueled, and vendor/hauling vehicles are analyzed as being diesel fueled. Calculations for total (daily trips x construction phase duration) worker, vendor, and hauler fuel consumption are provided in Tables 4.5-3, 4.5-4, and 4.5-5, respectively.

Table 4.5-3. Construction Worker Vehicle Gasoline Demand

Phase	Trips	Vehicle CO_2 (MT)	kg CO_2/Gallon	Gallons
Demolition	400	1.69	8.78	192.48
Grading	420	1.78	8.78	202.73
Building Construction	25,452	106.66	8.78	12,148.06
Paving	960	3.99	8.78	454.44
Architectural Coatings	650	2.70	8.78	307.52
			Total	**13,305.24**

Sources: Appendix B (construction worker CO_2); The Climate Registry 2019 (kg/CO_2/gallon).
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

Table 4.5-4. Construction Vendor Truck Diesel Demand

Phase	Trips	Vehicle CO_2 (MT)	kg CO_2/Gallon	Gallons
Demolition	100	1.12	10.21	118.51
Grading	84	1.01	10.21	98.92
Building Construction	10,100	120.50	10.21	11,802.15
Paving	0	0	10.21	0
Architectural Coatings	0	0	10.21	0
			Total	**12,019.59**

Sources: Appendix B (construction worker CO_2); The Climate Registry 2019 (kg/CO_2/gallon).
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

Table 4.5-5. Construction Haul Truck Diesel Demand

Phase	Trips	Vehicle CO_2 (MT)	kg CO_2/Gallon	Gallons
Demolition	4600	160	10.21	15,670.91
Grading	0	0	10.21	0
Building Construction	0	0	10.21	0
Paving	0	0	10.21	0
Architectural Coatings	0	0	10.21	0
			Total	15,670.91

Sources: Appendix B (construction worker CO); The Climate Registry 2019 (kg/CO/gallon).
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

As shown in Tables 4.5-2 through 4.5-5, the Project is estimated to consume a total of approximately 77,288 gallons of petroleum during the construction phase. By comparison, approximately 15.08 billion gallons of petroleum would be consumed in California over the course of the proposed Project's construction period based on the California daily petroleum consumption estimate of approximately 52.9 million gallons per day (CEC 2016). Additionally, the proposed Project would be required to comply with CARB's Airborne Toxics Control Measure, which limits fuel use by restricting heavy-duty diesel vehicle idling time to 5 minutes. Based on the calculations above, the Project would not significantly affect the overall demand for petroleum considering the Project's minimal contribution towards demand, as well as compliance with CARB's Airborne Toxics Control Measure, and therefore would not create wasteful, inefficient, or unnecessary consumption of energy resources.

Temporary electric power for as-necessary lighting and electronic equipment such as computers inside temporary construction trailers would be nominal; however, electricity used for such activities would be less than that required for Project operation and would be typical of similar construction sites; would not create wasteful, inefficient, or unnecessary consumption of energy resources; and would have a minimal contribution to the Project's overall energy consumption. Construction would comply with all relevant energy-related regulations by conserving energy and natural resources to the extent feasible. The energy demands due to diesel and gasoline use during construction would be small relative to statewide and local demands for fuel use, as discussed previously. The energy consumption during Project construction would be commensurate with typical construction projects and would not use energy wastefully or inefficiently. The Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction. Impacts related to temporary energy consumption during construction of the Project would be **less than significant.**

Operation

Electricity

Less than Significant Impact. SDG&E provides electric services to 3.7 million customers through 1.49 million electric meters and 905,000 natural gas meters throughout a 4,100-square-mile service area in San Diego County and southern Orange County (SDG&E 2022). According to CPUC, SDG&E customers consumed approximately 19,045 million kWh of electricity in 2020 (CPUC 2022). Based on recent energy supply and demand projections in California, statewide per-capita consumption is expected to remain relatively constant at 7,200–7,800 kWh per person (CEC 2015). More specifically, within the City, annual electricity consumption (encompassing both residential and nonresidential) was approximately 65,092,483 kWh in 2023 (SDG&E 2023).

CalEEMod estimates energy usage associated with building systems that are regulated under Title 24 (such as heating and cooling systems), lighting, and use of appliances, plug-ins, and other sources not covered by Title 24. CalEEMod estimated that the Project would consume approximately 1,452,465 kWh of electricity annually. Compared with the City's annual electricity consumption, the anticipated increase in consumption associated with one year of Project operation is approximately 2.2% of the City's use. Considering the Project would be consistent with the City's General Plan and zoning for the site, the local and regional electricity demand planning would have included the Project. In addition, the Project would, per Sustainable Santee Action Plan Checklist, achieve LEED certification and meet or exceed CALGreen Tier 2 Standards in effect at the time of the building permit application, and would self-generate a portion of electric energy demand with a 450 kW on-site solar energy systems, providing evidence that the operation of the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

Natural Gas

Less than Significant Impact. The CPUC regulates California natural gas rates and natural gas services, including in-state transportation over transmission and distribution pipeline systems, storage, procurement, metering, and billing. Most of the natural gas used in California comes from out-of-state natural gas basins. SDG&E provides natural gas service to San Diego and Orange Counties and would provide service to the Project site. CalEEMod estimated that the Project would consume approximately 4.4 million thousand Btu of natural gas annually (See Appendix B). By comparison, the City consumed approximately 2,065 million thousand Btu in 2023 (SDG&E 2023). The anticipated increase in consumption associated with one year of Project operation is approximately 0.21% of the SDG&E existing demand for the City. Considering the proposed Project would be consistent with the City's General Plan and zoning for the site, the local and regional natural gas demand planning would have included the Project. While natural gas for the Project would have been included in demand planning, it is important to note that this Project does not propose to use natural gas. In addition, the proposed Project would comply with Title 24 energy efficiency standards, providing evidence that the operation of the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

Petroleum

Less than Significant Impact. There are more than 36 million registered vehicles in California, and those vehicles consume an estimated 1.45 billion gallons of fuel each year (CEC 2022a; DMV 2022). Petroleum currently accounts for approximately 92% of California's transportation energy consumption (CEC 2019). However, technological advances, market trends, consumer behavior, and government policies could result in significant changes in fuel consumption. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce vehicle miles traveled. Market forces have driven the price of petroleum products steadily upward over time, and technological advances have made use of other energy resources or alternative transportation modes increasingly feasible. Largely as a result of and in response to these multiple factors, gasoline consumption within the state has declined in recent years, and availability of other alternative fuels and energy sources has increased. The quantity, availability, and reliability of transportation energy resources have increased in recent years, and this trend may likely continue and accelerate (CEC 2019). Increasingly available and diversified transportation energy resources act to promote continuing reliable and affordable means to support vehicular transportation within the state.

CalEEMod estimated that the Project would generate approximately 3,828,488 vehicle miles traveled (VMT) per year including passenger and truck trips associated with the operation of warehouse and manufacturing modeled

land uses, see Appendix A: CalEEMod Section 5.9, of Appendix B: Air Quality and GHG Emissions Technical Report, prepared by Dudek in May 2024. The CalEEMod VMT number is an annual total, whereas VMT in the transportation section of the EIR is based on SANDAG requirements of a per capita metric. As such they can't be compared directly, however, the CalEEMod program inputs were based on the SANDAG-required data used for the transportation analysis. As such the VMT data from the transportation analysis, is the basis for the project modeled for purposes of AQ, GHG, and energy.

Similar to construction worker and vendor trips, operational fuel consumption was estimated by converting the total CO_2 emissions from each land use type to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Where vehicle MT CO_2 emissions are calculated in CalEEMod, see Appendix A: CalEEMod Section 4.1.2, of Appendix B: Air Quality and GHG Emissions Technical Report, prepared by Dudek in May 2024. See Section 2.4.2 of the Air Quality and GHG Emissions Technical Report for detailed discussion of operational vehicle trip analysis. Based on the annual fleet mix provided in CalEEMod, calculations for annual mobile-source fuel consumption are provided in Table 4.5-6.

Table 4.5-6. Mobile Source Fuel Consumption – Operation

Fuel	Vehicle MT CO_2	kg CO_2/Gallon	Gallons
Gasoline	778.50	8.78	88,667.43
Diesel	2,220.90	10.21	217,522.04
		Total	**306,189.46**

Sources: Appendix B (mobile source CO_2); The Climate Registry 2019 (kg/CO_2/gallon).
Notes: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram.

As shown in Table 4.5-6, mobile sources from the proposed Project would result in approximately 88,667 gallons of gasoline per year and 217,522 gallons of diesel consumed per year beginning in 2024. By comparison, California as a whole consumed approximately 1.45 billion gallons of petroleum in 2018 (CEC 2019).

Over the lifetime of the Project, the fuel efficiency of the vehicles being used by residents, visitors, and employees is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the Project site during operation would decrease over time.

In summary, although the Project would increase electricity, natural gas, and petroleum use during operation, considering the size of the Project, estimated use of these resources would be minimal relative to existing statewide and local demands. Energy consumption during Project operation would be commensurate with typical commercial projects and would not use energy wastefully or inefficiently. Furthermore, the Project would include several sustainability design features to reduce potential energy and water usage, such as electric vehicle parking, LEED certification and meet or exceed CALGreen Tier 2 Standards in effect at the time of the building permit application, and would self-generate a portion of electric energy demand with a 450 kW on-site solar energy systems, and include drought-tolerant landscaping and water efficient irrigation systems.

As stated above, the proposed Project will include on-site solar PV systems. Other renewable energy systems including wind turbine generation, geothermal generation, energy storage, and other renewable energy generation features are not considered technically or economically feasible and/or demonstrated for a similar project. Additionally, site constraints include limited land availability and incompatibility with land use for large-scale power generation facilities, as well as unknown interconnection feasibility and compatibility with utility provider systems. For these reasons other on-site renewable energy systems are not considered feasible for the proposed Project.

Given the considerations above, energy consumption associated with operation of the Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would **be less than significant**.

B. Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The Project would meet the Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency. Title 24 of the California Code of Regulations contains energy efficiency standards for residential and nonresidential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope including windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs.

Title 24, Part 6. Title 24, Part 6 specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the State of California in order to reduce energy demand and consumption. The proposed Project would comply with Title 24, Part 6, per state regulations.

Title 24, Part 11. In addition to CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals.

2022 CALGreen. CALGreen standards are the current applicable standards. The 2022 standards improve upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. When compared to the 2019 Title 24 Standards, the 2022 amendments include measures that will further reduce energy use in single-family, multifamily, and nonresidential buildings, through the following strategies (CEC 2021):

- New prescriptive and performance standards for electric heat pumps for space conditioning and water heating, as appropriate for the various climate zones in California,
- Require PV and battery storage systems for newly constructed multifamily and selected nonresidential buildings,
- Updated efficiency measures for lighting, building envelope, HVAC, and
- Improvements to reduce the energy loads of certain equipment covered by (i.e., subject to the requirements of) the Energy Code that perform a commercial process that is not related to the occupant needs in the building (such as refrigeration equipment in refrigerated warehouses, or air conditioning for computer equipment in data processing centers).

Title 20. Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. CEC certifies an appliance based on a manufacturer's demonstration that the appliance meets the standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwashers; clothes washers and dryers; cooking products; electric motors; low-voltage dry-type distribution transformers; power supplies;

televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing each type of appliance covered under the regulations, and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Additionally, it is anticipated that operational vehicles would meet the applicable standards of AB 1493 (vehicles manufactured in 2009 or later), and as a result, would likely consume less energy as fuel efficiency standards increase and vehicles are replaced. SDG&E supplies natural gas and electricity to the Project site. The proposed Project would result in an increased use of natural gas and electricity. However, the Project would result in a nominal increase in natural gas and electricity over the City's typical annual natural gas and electricity consumption.

Sustainable Santee Plan

The City adopted the Sustainable Santee Plan in December of 2019 (City of Santee 2019). The Sustainable Santee Plan serves as the City's climate action plan (CAP) with the primary purpose or goals as follows:

1. Present the City's plan for achieving sustainability by utilizing resources efficiently, reducing greenhouse gas emissions, and preparing for potential climate-related impacts.
2. Identify how the City will effectively implement the Sustainable Santee Plan by obtaining funding for program implementation and tracking and monitoring the progress of the Plan implementation over time.
3. Allow streamlined CEQA compliance for new development by preparing an Environmental Impact Report for the Plan and developing tools that provide clear guidance to developers and other project proponents.
4. Maintain economic competitiveness within the region.

While the Sustainable Santee Plan serves as the City's CAP, many of the measures also relate to energy. As discussed in Section 4.6, Greenhouse Gas Emissions, of this EIR, the Project is consistent with the Sustainable Santee Action Plan Checklist adopted by the City to ensure that the emission targets identified in the Sustainable Santee Action Plan are achieved. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be **less than significant**.

4.5.5 Mitigation Measures and Level of Significance After Mitigation

All impacts related to energy would be less than significant. No mitigation is required.

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4.6 Greenhouse Gas Emissions

This section describes the existing greenhouse gas (GHG) conditions of the Palisade Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to implementation of the Project.

In addition to the documents incorporated by reference (see Section 2.7 of Chapter 2 of this EIR), the following analysis is based, in part, on the following sources:

- *Air Quality and Greenhouse Gas Emissions Technical Report* prepared by Dudek in March 2025 (Appendix B)

4.6.1 Existing Conditions

Climate Change Overview

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere (EPA 2022b).

The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long-wave radiation; and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature and creates a pleasant, livable environment on the Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise.

The scientific record of the Earth's climate shows that the climate system varies naturally over a wide range of time scales and that in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes, such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. Recent climate changes, in particular the warming observed over the past century, however, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-20th century and is the most significant driver of observed climate change (IPCC 2014; EPA 2022b). Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming, and improved understanding of the climate system (IPCC 2014). Continued emissions of GHGs will cause further warming and changes in all components of the climate system, which is discussed further below under Potential Effects of Climate Change.

Greenhouse Gases and other Climate Forcing Substances

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. GHGs include, but are not limited to, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone

(O_3), water vapor, hydrofluorocarbons (HFCs), hydrochlorofluorocarbons (HCFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).[1] Some GHGs, such as CO_2, CH_4, and N_2O, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases, such as HFCs, HCFCs, PFCs, and SF_6, are associated with certain industrial products and processes. A summary of the most common GHGs and their sources is included in the following text.[2] Also included is a discussion of other climate forcing substances.

Carbon Dioxide (CO_2). CO_2 is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic GHG that affects the Earth's radiative balance. Natural sources of CO_2 include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO_2 are from the combustion of fuels such as coal, oil, natural gas, and wood and changes in land use.

Methane (CH_4). CH_4 is produced through both natural and human activities. CH_4 is a flammable gas and is the main component of natural gas. Methane is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide (N_2O). N_2O is produced through natural and human activities, mainly through agricultural activities and natural biological processes, although fuel burning and other processes also create N_2O. Sources of N_2O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and using N_2O as a propellant (such as in rockets, racecars, and aerosol sprays).

Fluorinated Gases. Fluorinated gases (also referred to as F-gases) are synthetic powerful GHGs emitted from many industrial processes. Fluorinated gases are commonly used as substitutes for stratospheric ozone-depleting substances (e.g., CFCs, HCFCs, and halons). The most prevalent fluorinated gases include the following:

- ***Hydrofluorocarbons:*** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals used as alternatives to ozone-depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are used in manufacturing.
- ***Perfluorocarbons:*** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, with HFCs, to the ozone depleting substances. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.

1 California Health and Safety Code 38505 identifies seven GHGs that the California Air Resource Board is responsible to monitor and regulate to reduce emissions: CO_2, CH_4, N_2O, SF_6, HFCs, PFCs, and NF_3.

2 The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (1995), IPCC Fourth Assessment Report (2007), California Air Resource Board's Glossary of Air Pollution Terms (2015), and EPA's Glossary of Climate Change Terms (2016).

- ***Sulfur Hexafluoride:*** SF_6 is a colorless gas soluble in alcohol and ether and slightly soluble in water. SF_6 is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.
- ***Nitrogen Trifluoride:*** NF_3 is used in the manufacture of a variety of electronics, including semiconductors and flat panel displays.

Chlorofluorocarbons (CFCs). CFCs are synthetic chemicals that have been used as cleaning solvents, refrigerants, and aerosol propellants. CFCs are chemically unreactive in the lower atmosphere (troposphere) and the production of CFCs was prohibited in 1987 due to the chemical destruction of stratospheric O_3.

Hydrochlorofluorocarbons (HCFCs). HCFCs are a large group of compounds, whose structure is very close to that of CFCs—containing hydrogen, fluorine, chlorine, and carbon atoms—but including one or more hydrogen atoms. Like HFCs, HCFCs are used in refrigerants and propellants. HCFCs were also used in place of CFCs for some applications; however, their use in general is being phased out.

Black Carbon. Black carbon is a component of fine particulate matter, which has been identified as a leading environmental risk factor for premature death. It is produced from the incomplete combustion of fossil fuels and biomass burning, particularly from older diesel engines and forest fires. Black carbon warms the atmosphere by absorbing solar radiation, influences cloud formation, and darkens the surface of snow and ice, which accelerates heat absorption and melting. Black carbon is a short-lived species that varies spatially, which makes it difficult to quantify the global warming potential. Diesel particulate matter emissions are a major source of black carbon and are toxic air contaminates (TACs) that have been regulated and controlled in California for several decades to protect public health. In relation to declining diesel particulate matter from the California Air Resources Board's (CARB's) regulations pertaining to diesel engines, diesel fuels, and burning activities, CARB estimates that annual black carbon emissions in California have reduced by 70% between 1990 and 2010, with 95% control expected by 2020 (CARB 2014).

Water Vapor. The primary source of water vapor is evaporation from the ocean, with additional vapor generated by sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves. Water vapor is the most important, abundant, and variable GHG in the atmosphere and maintains a climate necessary for life.

Ozone (O_3). Tropospheric O_3, which is created by photochemical reactions involving gases from both natural sources and human activities, acts as a GHG. Stratospheric O_3, which is created by the interaction between solar ultraviolet radiation and molecular oxygen (O_2), plays a decisive role in the stratospheric radiative balance. Depletion of stratospheric O_3, due to chemical reactions that may be enhanced by climate change, results in an increased ground-level flux of ultraviolet-B radiation.

Aerosols. Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects

atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2022b). The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) CO_2 equivalent (CO_2e).

The current version of the CalEEMod (version 2022.1.1.19)[3] assumes that the GWP for CH_4 is 25 (so emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the IPCC Fourth Assessment Report (IPCC 2007). The GWP values identified in CalEEMod were applied to the Project.

Sources of Greenhouse Gas Emissions

Global Inventory

Anthropogenic GHG emissions worldwide in 2019 (the most recent year for which data is available) totaled approximately 52,400 million metric tons (MMT) of CO_2e, excluding land use change and forestry (PBL 2020). The top six GHG emitters include China, the United States, the Russian Federation, India, Japan, and the European Union, which accounted for approximately 62% of the total global emissions, or approximately 32,500 MMT CO_2e (PBL 2020). Table 4.6-1 presents the top GHG-emissions-producing countries.

Table 4.6-1. Six Top GHG Producer Countries

Emitting Countries	2019 GHG Emissions (MMT CO_2e)[a,b]
China	14,000
United States	6,600
European Union	4,300
India	3,700
Russian Federation	2,500
Japan	1,400
Total	**32,500**

Source: PBL 2020.
Notes: MMT CO_2e = million metric tons of carbon dioxide equivalent.
[a] Column may not add due to rounding.
[b] GHG emissions do not include land use change and forestry-related GHG emissions.

National Inventory

Per the EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990 to 2019 (EPA 2021), total United States GHG emissions were approximately 6,558.3 MMT CO_2e in 2019 (EPA 2021). The primary GHG emitted by human activities in the United States was CO_2, which represented approximately 80.1% of total GHG emissions (5,255.8 MMT CO_2e). The largest source of CO_2, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 92.4% of CO_2 emissions in 2019 (4,856.7 MMT CO_2e). Relative to 1990, gross United States

[3] CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform to calculate construction and operational emissions from land use development projects. The model was developed for the California Air Pollution Control Officers Association in collaboration with multiple air districts across the state. Numerous lead agencies in the state, including SDAPCD, use CalEEMod to estimate greenhouse gas emissions in accordance with CEQA Guidelines Section 15064.4(a)(1). CalEEMod Version 2022.1.1.19 was used for project analysis.

GHG emissions in 2019 were 1.8% higher; however, the gross emissions were down from a high of 15.6% above 1990 levels in 2007. GHG emissions decreased from 2018 to 2019 by 1.7% (113.1 MMT CO_2e) and overall, net emissions in 2019 were 13% below 2005 levels (EPA 2021).

State Inventory

According to California's 2000–2019 GHG emissions inventory (2021 edition), California emitted approximately 418 MMT CO_2e in 2019, including emissions resulting from out-of-state electrical generation (CARB 2022a). The sources of GHG emissions in California include transportation, industry, electric power production from both in-state and out-of-state sources, residential and commercial activities, agriculture, high-GWP substances, and recycling and waste. Table 4.6-2 presents California GHG emission source categories and their relative contributions to the emissions inventory in 2019.

Table 4.6-2. GHG Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO_2e)	Percent of Total*
Transportation	166.1	39.7%
Industrial	88.2	21.1%
Electric power	58.8	14.1%
Commercial and residential	43.8	10.5%
Agriculture	31.8	7.6%
High global-warming potential substances	20.6	4.9%
Recycling and waste	8.9	2.1%
Total	**418.2**	**100%**

Source: CARB 2022a.
Notes: GHG = greenhouse gas; MMT CO_2e = million metric tons of carbon dioxide equivalent.
* Column may not add due to rounding.

Between 2000 and 2019, per-capita GHG emissions in California have dropped from a peak of 14.0 MT CO_2e per person in 2001 to 10.5 MT CO_2e per person in 2019, representing an approximate 25% decrease. In addition, total GHG emissions in 2019 were approximately 7 MMT CO_2e lower than 2018 emissions (CARB 2022a).

Local Inventories

According to the GHG inventory data compiled by the Energy Policy Initiative Center, in 2012, the County (as defined to include all cities therein and unincorporated County areas) emitted 34.7 MMT CO_2e (EPIC 2015). As outlined in Table 4.6-3, San Diego County GHG Emissions by Sectors, on-road transportation generated 37% of these emissions.

Table 4.6-3. San Diego County GHG Emissions by Sectors

Source Category	Annual GHG Emissions (MMT CO2e)	Percent of Total
On-road transportation	13.14	37.2
Electricity generation	7.97	22.6
Natural gas end uses	2.84	8.0
Heavy Duty Trucks & Vehicles	1.89	5.4

Table 4.6-3. San Diego County GHG Emissions by Sectors

Source Category	Annual GHG Emissions (MMT CO2e)	Percent of Total
Solid Waste	1.75	4.9
Other Fuels	1.64	4.6
Industrial	1.43	4.1
Aviation	1.37	3.9
Off-Road	0.92	2.6
Wildfire	0.81	2.3
Other – Thermal Cogeneration	0.64	1.8
Water	0.52	1.5
Wastewater	0.16	0.5
Rail	0.11	0.3
Agriculture	0.08	0.2
Marine Vessels	0.05	0.1
Development and Sequestration	(0.65)	N/A
Total	**34.67**	**100**

Source: EPIC 2015.
Notes: GHG = greenhouse gas; MMT CO_2e = million metric tons of carbon dioxide equivalent per year

The 2013 emissions inventory for the City is shown in Table 4.6-4 below.

Table 4.6-4. City of Santee Community-Wide GHG Emissions by Sectors for 2013

Source Category	Annual GHG Emissions (MT CO2e)	Percent of Total
On-Road Transportation	242,499	60.24
Residential Energy	78,651	19.54
Commercial Energy	48,025	11.93
Solid Waste	11,151	2.77
Water	6,578	1.63
Off-Road Source	14,699	3.65
Wastewater	971	0.24
Total	**402,574**	**100**

Source: City of Santee 2019.
Notes: GHG emissions for each category are rounded. Sums may not add up to totals due to rounding.

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 IPCC Synthesis Report indicated that warming of the climate system is unequivocal and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, and rising sea levels (IPCC 2014).

In California, climate change impacts have the potential to affect sea-level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, frequency of severe weather events, and electricity demand and supply. The primary effect of global climate change has been a rise in average global tropospheric temperature. Reflecting the long-term warming trend since pre-industrial times, observed global mean surface temperature for the decade 2006–2015 was 0.87°C (1.6°F) (likely between 0.75°C [1.4°F] and 0.99°C [1.8°F]) higher than the average over the 1850–1900 period (IPCC 2018). Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. Human activities are estimated to have caused approximately 1.0°C (1.8°F) of global warming above pre-industrial levels (pre-industrial base period being years 1850–1900), with a likely range of 0.8°C to 1.2°C (1.4°F to 2.2°F) (IPCC 2018). Global warming is likely to reach 1.5°C (2.7°F) between 2030 and 2052 if it continues to increase at the current rate (IPCC 2018).

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. The Office of Environmental Health Hazard Assessment identified various indicators of climate change in California, which are scientifically based measurements that track trends in various aspects of climate change. Many indicators reveal discernible evidence that climate change is occurring in California and is having significant, measurable impacts in the state. Changes in the state's climate have been observed, including an increase in annual average air temperature with record warmth from 2012 to 2016, more frequent extreme heat events, more extreme drought, a decline in winter chill, an increase in cooling degree days and a decrease in heating degree days, and an increase in variability of statewide precipitation (OEHHA 2018).

Warming temperatures and changing precipitation patterns have altered California's physical systems—the ocean, lakes, rivers, and snowpack—upon which the state depends. Winter snowpack and spring snowmelt runoff from the Sierra Nevada and southern Cascade Mountains provide approximately one-third of the state's annual water supply. Impacts of climate on physical systems have been observed such as high variability of snow-water content (i.e., amount of water stored in snowpack), decrease in snowmelt runoff, glacier change (loss in area), rise in sea levels, increase in average lake water temperature and coastal ocean temperature, and a decrease in dissolved oxygen in coastal waters (OEHHA 2018).

Impacts of climate change on biological systems, including humans, wildlife, and vegetation, have also been observed, including climate change impacts on terrestrial, marine, and freshwater ecosystems. As with global observations, species responses include those consistent with warming: elevational or latitudinal shifts in range, changes in the timing of key plant and animal life cycle events, and changes in the abundance of species and in community composition. Humans are better able to adapt to a changing climate than plants and animals in natural ecosystems. Nevertheless, climate change poses a threat to public health as warming temperatures and changes in precipitation can affect vector-borne pathogen transmission and disease patterns in California as well as the variability of heat-related deaths and illnesses. In addition, since 1950, the area burned by wildfires each year has followed an increasing trend overall.

The CNRA has released four California Climate Change Assessments (2006, 2009, 2012, and 2018), which have addressed the following: acceleration of warming across the state, more intense and frequent heat waves, greater riverine flows, accelerating sea level rise, more intense and frequent drought, more severe and frequent wildfires, more severe storms and extreme weather events, shrinking snowpack and less overall precipitation, and ocean acidification, hypoxia, and warming. A summary of current and future climate change impacts to resource areas in California, as discussed in the Safeguarding California: Reducing Climate Risk (CNRA 2014), is provided in the following text.

Agriculture. The impacts of climate change on the agricultural sector are far more severe than the typical variability in weather and precipitation patterns that occur year to year. Some of the specific challenges faced by the agricultural sector and farmers include more drastic and unpredictable precipitation and weather patterns; extreme weather events that range from severe flooding to extreme drought, to destructive storm events; significant shifts in water availably and water quality; changes in pollinator lifecycles; temperature fluctuations, including extreme heat stress and decreased chill hours; increased risks from invasive species and weeds, agricultural pests and plant diseases; and disruptions to the transportation and energy infrastructure supporting agricultural production. These challenges and associated short-term and long-term impacts can have both positive and negative effects on agricultural production. Nonetheless, it is predicted that current crop and livestock production will suffer long-term negative effects resulting in a substantial decrease in the agricultural sector if not managed or mitigated.

Biodiversity and Habitat. The state's extensive biodiversity stems from its varied climate and assorted landscapes, which have resulted in numerous habitats where species have evolved and adapted over time. Specific climate change challenges to biodiversity and habitat include species migration in response to climatic changes, range shift, and novel combinations of species; pathogens, parasites and disease; invasive species; extinction risks; changes in the timing of seasonal life-cycle events; food web disruptions; and threshold effects (i.e., a change in the ecosystem that results in a "tipping point" beyond which irreversible damage or loss has occurs). Habitat restoration, conservation, and resource management across California and through collaborative efforts amongst public, private and nonprofit agencies has assisted in the effort to fight climate change impacts on biodiversity and habitat. One of the key measures in these efforts is ensuring species' ability to relocate as temperature and water availability fluctuate as a result of climate change, based on geographic region.

Energy. The energy sector provides California residents with a supply of reliable and affordable energy through a complex integrated system. Specific climate change challenges for the energy sector include temperature, fluctuating precipitation patterns, increasing extreme weather events and sea level rise. Increasing temperatures and reduced snowpack negatively impact the availability of a steady flow of snowmelt to hydroelectric reservoirs. Higher temperatures also reduce the capacity of thermal power plants since power plant cooling is less efficient at higher ambient temperatures. Natural gas infrastructure in coastal California is threatened by sea level rise and extreme storm events.

Forestry. Forests occupy approximately 33% of California's 100 million acres and provide key benefits such as wildlife habitat, absorption of CO_2, renewable energy and building materials. The most significant climate change related risk to forests is accelerated risk of wildfire and more frequent and severe droughts. Droughts have resulted in more large-scale mortalities and combined with increasing temperatures have led to an overall increase in wildfire risks. Increased wildfire intensity subsequently increases public safety risks, property damage, fire suppression and emergency response costs, watershed and water quality impacts and vegetation conversions. These factors contribute to decreased forest growth, geographic shifts in tree distribution, loss of fish and wildlife habitat and decreased carbon absorption. Climate change may result in increased establishment of non-native species, particularly in rangelands where invasive species are already a problem. Invasive species may be able to exploit temperature or precipitation changes, or quickly occupy areas denuded by fire, insect mortality or other climate change effects on vegetation.

Ocean and Coastal Ecosystems and Resources. Sea level rise, changing ocean conditions and other climate change stressors are likely to exacerbate long-standing challenges related to ocean and coastal ecosystems in addition to threatening people and infrastructure located along the California coastline and in coastal communities. Sea level rise in addition to more frequent and severe coastal storms and erosion are threatening vital infrastructure such as roads, bridges, power plants, ports and airports, gasoline pipes, and emergency facilities, as well as negatively

impacting the coastal recreational assets such as beaches and tidal wetlands. Water quality and ocean acidification threaten the abundance of seafood and other plant and wildlife habitats throughout California and globally.

Public Health. Climate change can impact public health through various environmental changes and is the largest threat to human health in the twenty-first century. Changes in precipitation patterns affect public health primarily through potential for altered water supplies, and extreme events such as heat, floods, droughts, and wildfires. Increased frequency, intensity and duration of extreme heat and heat waves is likely to increase the risk of mortality due to heat related illness as well as exacerbate existing chronic health conditions. Other extreme weather events are likely to negatively impact air quality and increase or intensify respiratory illness such as asthma and allergies. Additional health impacts that may be impacted by climate change include cardiovascular disease, vector-borne diseases, mental health impacts, and malnutrition injuries. Increased frequency of these ailments is likely to subsequently increase the direct risk of injury and/or mortality.

Transportation. Residents of California rely on airports, seaports, public transportation and an extensive roadway network to gain access to destinations, goods and services. While the transportation industry is a source of GHG emissions it is also vulnerable to climate change risks. Particularly, sea level rise and erosion threaten many coastal California roadways, airports, seaports, transit systems, bridge supports, and energy and fueling infrastructure. Increasing temperatures and extended periods of extreme heat threaten the integrity of the roadways and rail lines. High temperatures cause the road surfaces to expand which leads to increased pressure and pavement buckling. High temperatures can also cause rail breakages, which could lead to train derailment. Other forms of extreme weather events, such as extreme storm events, can negatively impact infrastructure which can impair movement of people and goods, or potentially block evacuation routes and emergency access roads. Increased wildfires, flooding, erosion risks, landslides, mudslides, and rockslides can all profoundly impact the transportation system and pose a serious risk to public safety.

Water. Water resources in California support residences, plants, wildlife, farmland, landscapes and ecosystems and bring trillions of dollars in economic activity. Climate change could seriously impact the timing, form, amount of precipitation, runoff patterns, and frequency and severity of precipitation events. Higher temperatures reduce the amount of snowpack and lead to earlier snowmelt, which can impact water supply availability, natural ecosystems and winter recreation. Water supply availability during the intense dry summer months is heavily dependent on the snowpack accumulated during the wintertime. Increased risk of flooding has a variety of public health concerns including water quality, public safety, property damage, displacement and post-disaster mental health problems. Prolonged and intensified droughts can also negatively affect groundwater reserves and result in increased overdraft and subsidence. Droughts can also negatively impact agriculture and farmland throughout the state. The higher risk of wildfires can lead to increased erosion, which can negatively impact watersheds and result in poor water quality. Water temperatures are also prone to increase, which can negatively impact wildlife that rely on a specific range of temperatures for suitable habitat.

In addition to the potential statewide effects of climate change, to address local and regional governments need for information to support action in their communities, the CNRA Fourth Assessment includes reports for nine regions of the state, including the San Diego Region, where the Project is located. Key projected climate changes for the San Diego Region include the following (CNRA 2019):

- Temperature is projected to increase substantially, along with mean temperature, heat wave frequency will increase, with more intensity and longer duration.

- Precipitation will remain highly variable but will change in character, with wetter winters, drier springs, and more frequent and severe droughts punctuated by more intense individual precipitation events.
- Wildfire risk will increase in the future as climate warms. The risk for large catastrophic wildfires driven by Santa Ana wind events will also likely increase as a result of a drier autumns leading to low antecedent precipitation before the height of the Santa Ana wind season.
- The sea level along San Diego County is expected to rise. High tides combined with elevated shoreline water levels produced by locally and distantly driven wind-driven waves will drive extreme events. Longer-term sea level will increase rapidly in the second half of the century and will be punctuated by short periods of storm-driven extreme sea levels that will imperil existing infrastructure, structures, and ecosystems with increasing frequency.

4.6.2 Relevant Plans, Policies, and Ordinances

Federal

Massachusetts v. EPA. In *Massachusetts v. EPA* (April 2007), the U.S. Supreme Court directed the EPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In December 2009, the administrator signed a final rule with the following two distinct findings regarding GHGs under Section 202(a) of the federal Clean Air Act (CAA):

- **Endangerment Finding:** The Administrator found that elevated concentrations of GHGs—CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator further found the combined emissions of GHGs—CO_2, CH_4, N_2O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare.

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the CAA.

Energy Independence and Security Act. The Energy Independence and Security Act of 2007 mandates the following measures to reduce national GHG emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel by 2022.
2. Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
3. Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Federal Vehicle Standards. 2007, the Bush Administration issued Executive Order (EO) 13432 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in

2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016 (75 FR 25324–25728).

In 2010, President Barack Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 by model year 2025 on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021 (77 FR 62624–63200). On January 12, 2017, the EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks (EPA 2022c).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018 (76 FR 57106–57513). The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6%–23% over the 2010 baselines.

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion MT and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).

In August 2018, the EPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. Compared to maintaining the post-2020 standards in place at the time, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2%–3% of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of 1°C by 2100 (EPA and NHTSA 2018).

In 2019, the EPA and NHTSA published the Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program (SAFE-1), which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California. In March 2020, Part Two was issued which set CO2 emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026. In March 2022, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards and ZEV sales mandate. EPA's March 2022 action concludes its reconsideration of the 2019 SAFE-1 rule by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and are now entirely rescinded.

The Inflation Reduction Act was signed into law by President Biden in August 2022. The bill includes specific investment in energy and climate reform and is projected to reduce GHG emissions within the U.S. by 40 percent as compared to 2005 levels by 2030. The bill allocates funds to boost renewable energy infrastructure (e.g., solar panels and wind turbines), includes tax credits for the purchase of electric vehicles, and includes measures that will make homes more energy efficient.

State

The statewide GHG emissions regulatory framework is summarized below by category: state climate change targets, building energy, renewable energy and energy procurement, mobile sources, solid waste, water, and other state regulations and goals. The following describes executive orders, legislation, regulations, and other plans and policies that would directly or indirectly reduce GHG emissions and/or address climate change issues.

State Climate Change Targets

Executive Order S-3-05. EO S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, GHG emissions should be reduced to 1990 levels by 2020, and GHG emissions should be reduced to 80% below 1990 levels by 2050.

EO S-3-05 also directed the California EPA to report biannually on progress made toward meeting the GHG targets and the impacts to California due to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. The Climate Action Team (CAT) was formed, which subsequently issues CAT Report Cards, with the most recent being issued in year 2023 including year 2022 emissions (CAT 2024).

Assembly Bill 32. In furtherance of the goals established in EO S-3-05, the legislature enacted AB 32 (Núñez and Pavley). The bill is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions to 1990 levels by 2020 and initiate the transformations required to achieve the state's long-range climate objectives.

Assembly Bill 1279. The Legislature enacted AB 1279, the California Climate Crisis Act, in September 2022. The bill declares the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. Additionally, the bill requires that by 2045, statewide anthropogenic GHG emissions be reduced to at least 85% below 1990 levels.

Assembly Bill 1757. AB 1757 (September 2022) requires the CNRA to determine a range of targets for natural, carbon sequestration, and for nature-based climate solutions that reduce GHG emissions for future years 2030, 2038, and 2045. These targets are to be determined by no later than January 1, 2024, and are established to support the state's goals to achieve carbon neutrality and foster climate adaptation and resilience.

Executive Order B-55-18. EO B-55-18 (September 2018) establishes a statewide policy to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net-negative emissions thereafter. The goal is an addition to the existing statewide targets of reducing the state's GHG emissions. CARB will work with relevant state agencies to ensure that future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

California Air Resources Board's Climate Change Scoping Plan. One specific requirement of AB 32 was for CARB to prepare a scoping plan for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code Section 38561[a]), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan. The Climate Change Scoping Plan: A Framework for Change (Scoping Plan) included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG

emissions limit and initiate the transformations needed to achieve the state's long-range climate objectives. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
2. Achieving a statewide renewable energy mix of 33%.
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions.
4. Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets.
5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard (17 CCR 95480 et seq.).
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

The Scoping Plan also identified local governments as essential partners in achieving California's goals to reduce GHG emissions because they have broad influence and, in some cases, exclusive authority over activities that contribute to significant direct and indirect GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations. Specifically, the Scoping Plan encouraged local governments to adopt a reduction goal for municipal operations, and for community emissions to reduce GHGs by approximately 15% from 2008 levels by 2020. Many local governments developed community-scale local GHG reduction plans based on this Scoping Plan recommendation.

In 2014, CARB approved the first update to the Scoping Plan. This document, *The First Update to the Climate Change Scoping Plan: Building on the Framework* (First Update), defined the state's GHG emission reduction priorities for the next 5 years, and laid the groundwork to start the transition to the post-2020 goals set forth in EO S-3-05 and EO B-16-2012. The First Update concluded that California is on track to meet the 2020 target but recommended a 2030 mid-term GHG reduction target be established to ensure a continuum of action to reduce emissions. The First Update recommended a mix of technologies in key economic sectors to reduce emissions through 2050, including energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the state's 1990 emissions level, using more recent GWPs identified by the IPCC, from 427 MMT CO_2e to 431 MMT CO_2e (CARB 2014).

In 2015, as directed by EO B-30-15, CARB began working on an update to the Scoping Plan to incorporate the 2030 target of 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in EO S-3-05. The governor called on California to pursue a new and ambitious set of strategies, in line with the five climate change pillars from his inaugural address, to reduce GHG emissions and prepare for the unavoidable impacts of climate change. In the summer of 2016, the legislature affirmed the importance of addressing climate change through passage of SB 32 (see below).

In December 2017, CARB adopted California's 2017 Climate Change Scoping Plan (2017 Scoping Plan) for public review and comment (CARB 2017). The 2017 Scoping Plan builds on the successful framework established in the initial Scoping Plan and First Update while identifying new, technologically feasible and cost-effective strategies that will serve as the framework to achieve the 2030 GHG target as established by SB 32 and define the state's climate

change priorities to 2030 and beyond. The strategies' commitments include implementing renewable energy and energy efficiency strategies (including the mandates of SB 350), increasing stringency of the Low Carbon Fuel Standard, implementing measures identified in the Mobile Source and Freight Strategies, implementing measures identified in the proposed Short-Lived Climate Pollutant Reduction Strategy, and increasing stringency of SB 375 targets. To fill the gap in additional reductions needed to achieve the 2030 target, it recommends continuing the Cap-and-Trade Program and a measure to reduce GHGs from refineries by 20%.

For local governments, the 2017 Scoping Plan replaced the initial Scoping Plan's 15% reduction goal with a recommendation to aim for a community-wide goal of no more than 6 MT CO_2e per capita by 2030, and no more than 2 MT CO_2e per capita by 2050, which are consistent with the state's long-term goals. These goals are also consistent with the Under 2 Memorandum of Understanding (Under 2 2016) and the Paris Agreement, which are developed around the scientifically based levels necessary to limit global warming to below 2°C. The 2017 Scoping Plan recognized the benefits of local government GHG planning (e.g., through CAPs) and provided more information regarding tools CARB was developing in support those efforts. It also recognized the CEQA streamlining provisions for project-level review where there is a legally adequate CAP.[4] The most recent CARB 2022 Scoping Plan Update outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress toward the 2030 SB 32 target (CARB 2022b). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the CARB 2017 and 2022 Scoping Plan Updates that outline the strategy to achieve those targets, are the most applicable to the Project. The 2022 Scoping Plan Update builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022b). A project is considered consistent with the statutes and executive orders if it meets the general policies in reducing GHG emissions to facilitate the achievement of the state's goals and does not impede attainment of those goals. A project would be consistent if it will further the objectives and not obstruct their attainment.

Executive Order B-30-15. EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under EO S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050, as set forth in EO S-3-05. To facilitate achievement of this goal, EO B-30-15 calls for an update to CARB's Scoping Plan to express the 2030 target in terms of MMT CO_2e. The executive order also calls for state agencies to continue to develop and implement GHG emissions reduction programs in support of the reduction targets. Sector-specific agencies in transportation, energy, water, and forestry were required to prepare GHG reduction plans by September 2015, followed by a report on action taken in relation to these plans in June 2016. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Senate Bill 32 and Assembly Bill 197. SB 32 and AB 197 (enacted in 2016) are companion bills that set new statewide GHG reduction targets, make changes to CARB's membership and increase legislative oversight of CARB's climate change-based activities, and expand dissemination of GHG and other air-quality-related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990

[4] *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490; *San Francisco Tomorrow et al. v. City and County of San Francisco* (2015) 229 Cal.App.4th 498; *San Franciscans Upholding the Downtown Specific Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656; *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly to provide ongoing oversight over implementation of the state's climate policies. AB 197 also added two members of the Legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and TACs from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

Senate Bill 605 and Senate Bill 1383. SB 605 (2014) required CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants in the state, and SB 1383 (2016) required CARB to approve and implement that strategy by January 1, 2018. The Short-Lived Climate Pollutants Reduction Strategy was approved by CARB in March 2017, and lays out a range of options to reduce short-lived climate pollutant emissions in California, including regulations, incentives, and other market-supporting activities. SB 1383 also establishes specific targets for the reduction of short-lived climate pollutants (40% below 2013 levels by 2030 for CH_4 and HFCs, and 50% below 2013 levels by 2030 for anthropogenic black carbon) and provides direction for reductions from dairy and livestock operations and landfills. Accordingly, and as mentioned above, CARB adopted its Short-Lived Climate Pollutant Reduction Strategy in March 2017. This strategy establishes a framework for the statewide reduction of emissions of black carbon, CH_4, and fluorinated gases.

Senate Bill 1020. SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers come from eligible renewable energy resources and zero-carbon resources:

- 90% by December 31, 2035
- 95% by December 31, 2040
- 100% by December 31, 2045

Building Energy

Title 24, Part 6. Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Although not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and California Energy Commission (CEC) and revised if necessary (California Public Resources Code [PRC] Section 25402[b][1]). The regulations receive input from members of industry and the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (PRC Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (PRC Section 25402[d]) and cost effectiveness (PRC Sections 25402[b][2] and [b][3]). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2019 Title 24 standards became effective on January 1, 2020. The 2019 Title 24 Building Energy Efficiency Standards further reduce energy used and associated GHG emissions compared to prior standards. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy due to energy efficiency measures than those built to the 2016 standards; once rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards will use approximately 53% less energy than those under the 2016 standards (CEC 2018). Nonresidential buildings built to the 2019 standards are anticipated to use an estimated 30% less energy than those built to the 2016 standards (CEC 2018).

The 2022 Title 24 standards improve upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The CEC adopted the 2022 Title 24 Energy Code in August 2021 and the California Building Standards Commission approved incorporating the updated code into the California Building Standards Code (CALGreen) in December 2021. The 2022 Energy Code went into effect on January 1, 2023. The 2022 Energy Code focuses on four key areas in newly constructed homes and businesses:

- Encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-powered units.
- Establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking, and electric vehicle (EV) charging options whenever they choose to adopt those technologies.
- Expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available onsite and complement the state's progress toward a 100% clean electricity grid.
- Strengthening ventilation standards to improve indoor air quality.

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as California's Green Building Standards (CALGreen) and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings, schools, and hospitals. The CALGreen 2019 standards, which are the current standards, became effective January 1, 2020.

The 2022 standards improve upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The CEC updates the Title 24 Energy Code every 3 years. The CEC adopted the 2022 Title 24 Energy Code in August 2021 and the California Building Standards Commission approved incorporating the updated code into the California Building Standards Code (CALGreen) in December 2021. The 2022 Energy Code went into effect on January 1, 2023. When compared to the 2019 Title 24 Standards, the 2022 amendments include measures that will further reduce energy use in single family, multifamily, and nonresidential buildings, through the following strategies (CEC 2021):

- New prescriptive and performance standards for electric heat pumps for space conditioning and water heating, as appropriate for the various climate zones in California,
- Require PV and battery storage systems for newly constructed multifamily and selected nonresidential buildings,
- Updated efficiency measures for lighting, building envelope, HVAC, and

Improvements to reduce the energy loads of certain equipment covered by (i.e., subject to the requirements of) the Energy Code that perform a commercial process that is not related to the occupant needs in the building (such as refrigeration equipment in refrigerated warehouses, or air conditioning for computer equipment in data processing centers).

Title 20. Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air

conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing for each type of appliance covered under the regulations, and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Assembly Bill 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general-purpose lighting to reduce electricity consumption by 50% for indoor residential lighting and by 25% for indoor commercial lighting.

Senate Bill 1. SB 1 (Murray) (August 2006) established a $3 billion rebate program for the installation of rooftop solar energy systems with a generation capacity of 3,000 megawatts through 2016. SB 1 added sections to the Public Resources Code, including Chapter 8.8 (California Solar Initiative), that require building projects applying for ratepayer-funded incentives for photovoltaic systems to meet minimum energy efficiency levels and performance requirements. Section 25780 established that it is a goal of the state to establish a self-sufficient solar industry. The goals included establishing solar energy systems as a viable mainstream option for homes and businesses within 10 years of adoption and placing solar energy systems on 50% of new homes within 13 years of adoption.

Assembly Bill. This bill established the Solar Water Heating and Efficiency Act of 2007. AB 1470 makes findings and declarations of the Legislature relating to the promotion of solar water heating systems and other technologies that reduce natural gas demand. AB 1470 defines several terms for purposes of the act. The bill required a commission to evaluate the data available from a specified pilot program, and to design and implement a program of incentives for the installation of 200,000 solar water heating systems in homes and businesses throughout the state by 2017.

Renewable Energy and Energy Procurement

Senate Bill 1078 (2002) established the Renewables Portfolio Standard (RPS) program, which requires an annual increase in renewable generation by the utilities. Initially, the RPS required utilities to obtain 20% of their power from renewable sources by 2010. SB X1-2 (2011) subsequently expanded the RPS by establishing that 33% of the total electricity sold to retail customers in California per year by December 31, 2020, and in subsequent years, be secured from qualifying renewable energy sources. SB 350 (2015) further expanded the RPS by establishing that 50% of the total electricity sold to retail customers in California per year by December 31, 2030, be secured from qualifying renewable energy sources. And SB 100 (2018) further accelerated the RPS, requiring achievement of a 50% RPS by December 31, 2026, and a 60% RPS by December 31, 2030. SB 100 also established a new state policy goal that calls for eligible renewable energy resources and zero-carbon resources to supply 100% of electricity retail sales and 100% of electricity procured to serve all state agencies by December 31, 2045.

Under the program, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

Mobile Sources

State Vehicle Standards. Assembly Bill 1493 (July 2002) was enacted in response to the transportation sector accounting for more than one-half of California's CO_2 emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles that are primarily used for noncommercial personal transportation in the state. AB 1493 required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of zero-emissions vehicles. It ordered CARB, CEC, the California Public Utilities Commission, and other relevant agencies to work with the Plug-In Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050. This directive did not apply to vehicles that have special performance requirements necessary for the protection of public safety and welfare.

Executive Order S-1-07. Issued on January 18, 2007, EO S-1-07 sets a declining Low Carbon Fuel Standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold in California. The initial target of the Low Carbon Fuel Standard was to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020. The Low Carbon Fuel Standard was subsequently amended in 2018 to require a 20% reduction in carbon intensity by 2030. This new requirement aligns with California's overall 2030 target of reducing climate changing emissions to 40% below 1990 levels by 2030, set by SB 32. CARB has adopted implementing regulations for both the 10% and 20% carbon intensity reduction targets.

Senate Bill 375. SB 375 (2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 required CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional metropolitan planning organizations (MPO) are then responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, a metropolitan planning organization must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to California Government Code Section 65080(b)(2)(K), an SCS does not regulate the use of land; supersede the land use authority of cities and counties; or require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

In 2010, CARB adopted the SB 375 targets for the regional MPOs. The targets adopted for SANDAG in 2010 are a 7% reduction in per-capita passenger-vehicle GHG emissions by 2020 and a 13% reduction by 2035, measured relative to 2005 GHG emissions. In 2018, CARB adopted the second round of SB 375 reduction targets, and increased SANDAG's 2020 target to a 15% reduction in per-capita passenger-vehicle GHG emissions, and the 2035 target to a 19% reduction using the same 2005 baseline.

SANDAG completed and adopted its 2050 RTP/SCS in October 2011. In November 2011, CARB, by resolution, accepted SANDAG's GHG emissions quantification analysis and determination that, if implemented, the SCS would achieve CARB's 2020 and 2035 GHG emissions reduction targets for the region.

After SANDAG's 2050 RTP/SCS was adopted, a lawsuit was filed challenging EO S-3-05's 2050 goal of an 80% reduction in GHG emissions from 1990 levels. The Supreme Court of California held that the Environmental Impact Report at issue was sufficient to inform the public, based on the information available at the time, about the regional plan's GHG impacts and its potential inconsistency with state climate change goals without including an explicit analysis of the consistency of projected 2050 GHG emissions with the goals in the executive order. (*Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal. 5th 497.)

In 2015, SANDAG adopted the next iteration of its RTP/SCS in accordance with statutorily mandated timelines and no subsequent litigation challenge was filed. More specifically, in October 2015, SANDAG adopted San Diego Forward: The Regional Plan (Regional Plan) (SANDAG 2015). Like the 2050 RTP/SCS, San Diego Forward: Regional Plan meets CARB's 2020 and 2035 reduction targets for the region (SANDAG 2015). In December 2015, CARB, by resolution, accepted SANDAG's GHG emissions quantification analysis and determination that, if implemented, the SCS would achieve CARB's 2020 and 2035 GHG emissions reduction targets for the region. The Regional Plan was updated in 2021, which was the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies (SANDAG 2021).

On February 26, 2021, SANDAG's Board of Directors adopted the final 2021 Regional Transportation Improvement Program (RTIP). The 2021 RTIP covers five fiscal years (FY 2021 through FY 2025) and incrementally implements the SANDAG 2019 Federal Regional Transportation Plan. The 2021 RTIP is designed to implement the region's overall strategy for providing mobility and improving the safety, condition, and efficiency of the transportation system while reducing transportation related air pollution. The 2021 RTIP incrementally implements San Diego Forward: The 2019 Federal Regional Transportation Plan (2019 Federal RTP), the long-range transportation plan for the San Diego region approved by the SANDAG Board of Directors on October 25, 2019.

Advanced Clean Cars Program. The Advanced Clean Cars program (January 2012) is an emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide fuels for clean cars. To improve air quality, CARB implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that by 2025, cars will emit 75% less smog-forming pollution than the average new car sold in 2012. To reduce GHG emissions, CARB, in conjunction with the EPA and NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34% in 2025. The zero-emissions vehicle (ZEV) program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018 to 2025 model years.

Assembly Bill 1236. AB 1236 (October 2015) (Chiu) directs cities and/or counties to approve an application for the installation of electric vehicle charging stations, as defined, through the issuance of specified permits unless the city or county makes specified written findings based on substantial evidence in the record that the proposed installation would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact. AB 1236 provided for appeal of that decision to the planning commission, as specified. The bill provided that the implementation of consistent statewide standards to

achieve the timely and cost-effective installation of electric vehicle charging stations is a matter of statewide concern. The bill required electric vehicle charging stations to meet specified standards. AB 1236 required a city, county, or city and county with a population of 200,000 or more residents to adopt an ordinance, by September 30, 2016, that created an expedited and streamlined permitting process for electric vehicle charging stations. The bill also required a city, county, or city and county with a population of fewer than 200,000 residents to adopt this ordinance by September 30, 2017.

Executive Order B-16-12. EO B-16-12 (2012) directs state entities to support and facilitate development and distribution ZEVs. On a statewide basis, EO B-16-12 also establishes a GHG emissions reduction target from the transportation sector equaling 80% less than 1990 levels by 2050. In furtherance of this executive order, the Governor convened an Interagency Working Group on ZEVs that has published multiple reports regarding the progress made on the penetration of ZEVs in the statewide vehicle fleet.

Senate Bill 350. In 2015, SB 350 – the Clean Energy and Pollution Reduction Act – was enacted into law. As one of its elements, SB 350 establishes a statewide policy for widespread electrification of the transportation sector, recognizing that such electrification is required for achievement of the state's 2030 and 2050 reduction targets (see California Public Utilities Code, Section 740.12).

Solid Waste

Assembly Bill 939, Assembly Bill 341, and Assembly Bill 1826. In 1989, AB 939, known as the Integrated Waste Management Act (PRC Sections 40000 et seq.), was passed because of the increase in waste stream and decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed of where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by 2000.

AB 341 amended the California Integrated Waste Management Act to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle published a discussion document titled AB 341 Report to the Legislature, which identified five priority strategies that CalRecycle believed would assist the state in reaching the 75% goal by 2020, legislative and regulatory recommendations, and an evaluation of program effectiveness (CalRecycle 2015).

AB 1826 (requires businesses to recycle their organic waste (i.e., food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

Water

Executive Order B-29-15. (April 2015) Sets a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the executive order extended through February 28, 2016, although

many of the directives have since become permanent water-efficiency standards and requirements. The executive order includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increased the requirements for landscape water use efficiency and broadened its applicability to include new development projects with smaller landscape areas.

Executive Order B-37-16. Issued May 2016, EO B-37-16 directed the State Water Resources Control Board to adjust emergency water conservation regulations through the end of January 2017 to reflect differing water supply conditions across the state. The State Water Resources Control Board also developed a proposal to achieve a mandatory reduction of potable urban water usage that builds off the mandatory 25% reduction called for in EO B-29-15. The State Water Resources Control Board and Department of Water Resources will develop new, permanent water use targets that build on the existing state law requirements that the state achieve a 20% reduction in urban water usage by 2020. EO B-37-16 also specifies that the State Water Resources Control Board permanently prohibit water-wasting practices such as hosing off sidewalks, driveways, and other hardscapes; washing automobiles with hoses not equipped with a shut-off nozzle; using non-recirculated water in fountains and other decorative water features; watering lawns in a manner that causes runoff, or within 48 hours after measurable precipitation; and irrigating ornamental turf on public street medians.

Other State Regulations and Goals

Senate Bill 97. (Dutton) (August 2007) directed the Governor's Office of Planning and Research to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, the Governor's Office of Planning and Research issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents. The advisory indicated that the lead agency should identify and estimate a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities (OPR 2007). The advisory further recommended that the lead agency determine significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The CNRA adopted the CEQA Guidelines amendments in December 2009, which became effective in March 2010.

Under the amended CEQA Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR § 15064.4[a]). The CEQA Guidelines require a lead agency to consider the extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR § 15064.4[b]). The CEQA Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a GHG emissions threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. The CNRA also acknowledged that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions (CNRA 2009a).

With respect to GHG emissions, the CEQA Guidelines state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance-based standards" (14 CCR § 15064.4[a]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: the extent a project may

increase or reduce GHG emissions as compared to the existing environmental setting; whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

Executive Order S-13-08. EO Order S-13-08 (November 2008) Directs state agencies to take specified actions to assess and plan for global climate change impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009 (CNRA 2009b), and an update, Safeguarding California: Reducing Climate Risk, followed in July 2014 (CNRA 2014). To assess the state's vulnerability, the report summarizes key climate change impacts to the state for the following areas: agriculture, biodiversity and habitat, emergency management, energy, forestry, ocean and coastal ecosystems and resources, public health, transportation, and water.

Local

Sustainable Santee Plan

The City adopted the Sustainable Santee Plan in December of 2019 (City of Santee 2019). The Sustainable Santee Plan serves as the City's climate action plan (CAP) with the primary purpose or goals as follows:

- Present the City's plan for achieving sustainability by utilizing resources efficiently, reducing greenhouse gas emissions, and preparing for potential climate-related impacts.
- Identify how the City will effectively implement the Sustainable Santee Plan by obtaining funding for program implementation and tracking and monitoring the progress of the Plan implementation over time.
- Allow streamlined CEQA compliance for new development by preparing an Environmental Impact Report for the Plan and developing tools that provide clear guidance to developers and other project proponents
- Maintain economic competitiveness within the region.

The Sustainable Santee Action Plan Project Consistency Checklist (Checklist) is intended to be a tool for development projects to demonstrate consistency with Santee's (City's) Sustainable Santee Action Plan, which is a qualified greenhouse gas (GHG) emissions reduction plan in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15183.5. This Checklist has been developed as part of the Sustainable Santee Action 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.

4.6.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to greenhouse gases/climate change are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to greenhouse gas emissions would occur if the Project would:

A. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
B. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

With respect to GHG emissions, the CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or performance-based standards" (14 CCR 15064.4[a]). A lead agency may use a "model or methodology" to estimate greenhouse gas emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change" (14 CCR 15064.4[c]). The CEQA Guidelines provide that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment (14 CCR 15064.4[b]):

- The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In addition, the CEQA Guidelines specify that "[w]hen adopting or using thresholds of significance, a lead agency may 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" (14 CCR 15064.7[c]).

Approaches to Determining Significance

As discussed above, The Sustainable Santee Action Plan Project Consistency Checklist (Checklist) is intended to be a tool for development projects to demonstrate consistency with the City's Sustainable Santee Action Plan, which is a qualified GHG emissions reduction plan in accordance with CEQA Guidelines Section 15183.5. Therefore, the Checklist is used to determine significance in accordance with CEQA Guidelines Section 15183.5 and the Checklist was used to evaluate the Project's significance with respect to GHG emissions. Construction and operational GHG emissions are quantified herein for informational purposes only.

Methodology

Construction

Construction of the Project would result in emissions of GHG emissions primarily associated with use of off-road construction equipment, on-road haul and vendor (material delivery) truck trips, and worker vehicle trips. As discussed previously in Section 4.2, Air Quality, emissions from the construction phase of Project components were estimated using the CalEEMod Version 2022.1.1.4. Per preliminary Project details, it is assumed that construction of the Project would begin in June 2024 and would last approximately 15 months. A detailed depiction of the construction schedule—including information regarding phasing, equipment used during each phase, haul trucks, vendor trucks, and worker vehicles—is included in Section 4.2, Air Quality, and complete details of the emissions calculations are provided in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files,* of Appendix B to this EIR. Con-related GHG emissions were amortized over 30 years and added to operational emissions to assess significance.

Operation

Project operations would generate CO_2, CH_4, and N_2O emissions. Primary emissions sources would include:

- Area Source (landscape and site maintenance activities)
- Energy Source (combustion emissions associated with natural gas and electricity)
- Mobile Source (vehicles)
- On-Site Equipment Emissions
- Solid Waste
- Water Supply, Treatment, and Distribution

Area

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. For San Diego County, CalEEMod assumes that landscaping equipment would operate 180 days per year.

Energy

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage (non-hearth). CalEEMod default values for energy consumption were applied to each land use. GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting.[5] The energy use from non-residential land uses is based on various studies and assessments as described in Section 7.3, *Estimating Energy Use from Other Land Uses*, of Appendix B of the CalEEMod User's Guide (CAPCOA 2021).

Annual natural gas and electricity emissions were estimated in CalEEMod using default values for emissions factors for San Diego Gas and Electric (SDG&E), which would be the energy source provider for the Project.

Mobile Sources (Motor Vehicles)

All details for criteria air pollutants discussed in Section 4.2, Air Quality, are also applicable for the estimation of operational mobile source GHG emissions. It was assumed that the warehouse would operate 7 days per week; therefore, 365 days of vehicle emissions were assumed. Regulatory measures related to mobile sources include AB 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the National Highway Traffic Safety Administration and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the Project's motor vehicles.

[5] The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would occur.

The effectiveness of fuel economy improvements was evaluated to the extent it was captured in the EMFAC2021 emission factors for motor vehicles in 2025.

On-Site Equipment Source Emissions.

It is common for industrial buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. The most common types of cargo handling equipment are forklifts, pallet jacks and yard trucks which are designed for moving cargo containers. Yard trucks are also known as yard goats, utility tractors, hustlers, yard hostlers, and yard tractors. The cargo handling equipment is assumed to have a horsepower (hp) range of approximately 175 hp to 215 hp. Based on the maximum square footage of proposed building space, on-site modeled operational equipment includes a total of 36, Tier4i or better diesel fueled forklifts (forklifts and pallet jacks) and 1 Tier4i or better diesel fueled yard tractors operating at 8 hours a day for 365 days of the year. See Appendix B of this EIR for detailed calculations.

Solid Waste

The Project would generate solid waste, and therefore, result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste.

Water and Wastewater

Supply, conveyance, treatment, and distribution of water for the Project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the Project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment.

For additional details see Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files,* within Appendix B of this EIR.

4.6.4 Impacts 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 emissions of greenhouse gases?

Less-than-Significant Impact.

As discussed above in Section 4.6.3, Methodology, the Sustainable Santee Action Plan Project Consistency Checklist (Checklist) is intended to be a tool for development projects to demonstrate consistency with the City's Sustainable Santee Action Plan, which is a qualified GHG emissions reduction plan in accordance with CEQA Guidelines Section 15183.5. This Checklist has been developed as part of the Sustainable Santee Action 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. Project-generated GHG emissions were estimated per the methodology described in Section 4.6.3, Methodology, and are discussed for construction and operation below.

Project GHG Emissions

Construction

Table 4.6-5 shows the estimated annual GHG construction emissions associated with the Project. Additional information about methodology and approach are provided above in Section 4.6.3, Methodology. Complete details of the construction emissions calculations are provided in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files,* of Appendix B of this EIR.

Table 4.6-5. Estimated Annual Construction GHG Emissions

Year	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons				
2024	499	0.02	0.04	0.32	511
2025	257	0.01	0.01	0.16	261
Total	*756*	*0.03*	*0.05*	*0.48*	*772*
				Amortized Emissions (30 years)	*25.73*

Source: CalEEMod Version 2020.4.0.
Notes: GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent; R = refrigerants.
See Appendix B of this EIR for complete results. <0.01 = reported value is less than 0.01.

As shown in Table 4.6-5, the estimated total GHG emissions from construction of the Project would be 772MT CO_2e. When amortized over 30 years, the estimated annual GHG emissions from construction of the Project would be approximately 26 MT CO_2e per year.

Operation

Table 4.6-6 shows the estimated annual GHG operational emissions associated with the Project. As discussed above, total annual operational emissions were combined with amortized (30 years) construction emissions and provided for informational purposes only. As shown in Table 4.6-6, implementation of the Project would result in approximately 4,573.78 MT CO_2e per year including amortized construction emissions. Complete details of the construction emissions calculations are provided in Appendix A, *Air Quality and Greenhouse Gas Emissions CalEEMod Output Files,* of Appendix B of this EIR.

Table 4.6-6. Summary of Estimated Annual GHG Emissions

Emissions Source	MT CO2	MT CH4	MT N2O	R	MT CO2e
Area	4.38	<0.005	<0.005	—	4.40
Energy	565.00	0.04	<0.005	—	567.00
Mobile	2,895.00	0.12	0.33	3.76	2,999.00
Off-road (Cargo Handling)	665	0.03	0.01	—	668
Stationary	9.52	<0.005	<0.005	0	9.55
Waste	25.20	2.52	0	—	88.10
Water	139.00	2.27	0.05	—	212.00
				Amortized Construction Emissions (30 years)	*25.73*
				Total Project Emissions	***4,573.78***

Source: See Appendix B of this EIR for complete results.

Notes: GHG = greenhouse gas; MT = metric tons; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent; R = refrigerants. <0.01 = reported value is less than 0.01.
Sustainable Santee Action Plan Project Consistency Checklist (Checklist)

The Checklist is used to determine significance in accordance with CEQA Guidelines Section 15183.5; therefore, the Checklist was used to evaluate the Project's significance with respect to GHG emissions. The City's General Plan designates the Project site for Light Industrial uses and the site is zoned for Light Industrial, per the City's Zoning Code. The proposed Project would be consistent with Chapter 13.14 of the City's Municipal Code, which states that allowed industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and business parks, including corporate offices (City of Santee 2017, 2020). This zoning is consistent with the Light Industrial land use designation of the General Plan (City of Santee 2017, 2020). Table 4.6-7 includes the applicable Checklist items and the related project consistency analysis. Please see Appendix C, *Sustainable Santee Action Plan Project Checklist*, of Appendix B to this EIR for complete details.

Table 4.6-7. Sustainable Santee Action Plan Project Checklist

Check List Item	Project Consistency
Measure 4.1. New commercial units meet or exceed California Green Building Standards Tier 2 Voluntary Measures such as obtain green building ratings including: LEED, Build it Green, or Energy Star Certified buildings certification in scoring development and explain the measures implemented.	**Consistent.** The Project will meet or exceed CALGreen Tier 2 Standards in effect at the time of the building permit application. Documentation shall be provided to the City demonstrating that the Project meets this requirement prior to the issuance of the building permit.
Measure 5.1 Project utilizes tree planting for shade and energy efficiency such as tree planting in parking lots and streetscapes.	**Consistent.** Landscaping will be installed in the passenger parking area and around portions of the buildings as well as site frontages, including trees, shrubs and cover. See Figure 3-9 of the Landscape Plan.
Measure 5.2. Project uses light-reflecting surfaces such as enhanced cool roofs on commercial buildings.	**Consistent.** Roof structures shall be designed to include "cool roofs" materials with a minimum aged reflectance and thermal emittance values equal to or greater than the current CALGreen Table A5.106.11.3, Tier 1.
Measure 6.1 Proposed project streets include sidewalks, crosswalks, and other infrastructure that promotes non-motorized transportation options.	**Consistent.** The Project would include street, sidewalk, and landscape improvements, as shown on Figure 3-7, Conceptual Site Plan
Measure 7.1 Install electric vehicle chargers in all new residential and commercial developments.	**Consistent.** The Project includes 16 EVCS (EV Capable Stall with EVSE). See site plan.
Measure 7.1 d. For new industrial and other Land Uses employing 200 or more employees, install e-chargers for 5 percent of the total parking spaces.	**Consistent.** The Project includes 301 total parking spaces. 301 x 0.05 = 15 spaces. The Project includes 16 EVCS with EVSE.
Measure 8.1 Implement traffic flow improvement program	**Consistent.** See Traffic Impact Analysis Section 9.2. The Project will install a stop-controlled (not free) southbound right turn lane at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection. to improve traffic flow.
Measure 9.1. Reduce waste at landfills.	**Consistent.** The Project will include storage areas for recyclables and green waste as well as food waste.

Table 4.6-7. Sustainable Santee Action Plan Project Checklist

Check List Item	Project Consistency
Measure 10.1 c. On commercial buildings, install at least 2 kW per square foot of building area (e.g., 2,000 sqft = 3kW) unless the installation is infeasible due to poor solar resources.	**Consistent.** As stated in Project Design Feature PDF-GHG-1 (see Section 3.3.3 of Chapter 3, Project Description), the Project will include 450 kW of solar PV based on 300,145 SF / (2,000SF/3kW)

Source: Appendix C, *CAP Consistency Checklist*, of Appendix B to this Draft EIR

As shown in Table 4.6-7, the Project is consistent with the Sustainable Santee Action Plan Checklist adopted by the City to ensure that the emission targets identified in the Sustainable Santee Action Plan are achieved. The Sustainable Santee Action Plan determined that a project consistent with the Checklist would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, the Project would not generate GHG emissions that may have a significant impact on the environment; impacts would be **less than significant**.

4.6.5 Mitigation Measures and Level of Significance After Mitigation

All impacts to greenhouse gas emissions would be less than significant. No mitigation is required.

4.7 Hazards and Hazardous Materials

This section describes the existing hazards and hazardous materials conditions of the Palisade Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to the implementation of the Project.

In addition to the documents incorporated by reference (see Section 2.7 of Chapter 2 of this EIR), the following analysis is based, in part, on the Phase I Environmental Site Assessment (ESA) prepared by Hazard Management Consulting, Inc. on October 17, 2022, and included as Appendix I of this EIR.

4.7.1 Existing Conditions

Project Site Conditions

The approximately 13.5-acre Project site is currently developed with a two-screen drive-in theatre, including paved theatre parking lots, a building containing restrooms and a snack bar (concessions building), and two ticket booths. The drive-in theatre has closed, but the Santee Swap Meet utilizes the site on the weekends.

The Project site boundary extends beyond the paved drive-in into an undeveloped area just north of the property and south of the San Diego River. The site is relatively flat with an elevation of approximately 355 feet above mean sea level with a regional slope to the west southwest. The site is located in the City of Santee, San Diego County and is set in an industrial use area located off of North Woodside Avenue.

Phase I Environmental Site Assessment Findings

A Phase I ESA was conducted to identify potential or existing environmental contamination on the site. The Phase I ESA was prepared for the Project in October 2022 by Hazard Management Consulting and included: documentation of a site walk of current conditions and neighboring facilities; a review of the regulatory database report; review of previously prepared reports for the site; submittal of questionnaires to the current owner and user of the site; review of historical references including aerial photographs, city directories, Sanborn Maps and topographic maps; on-line research and file review requests concerning the site and suspect off-site sources at the State of California Regional Water Quality Control Board (RWQCB) and Department of Toxic Substances Control (DTSC) websites; public records requests submitted to the City of Santee; public records requests submitted to the San Diego County Department of Environmental Health; public records submitted to the San Diego County Air Pollution Control District; and preparation of the findings (Appendix I).

Project Site

The site was first seen to have been agricultural land as late as the 1950s until the drive-in theatre was developed at the site in the mid-1960s. There is a low likelihood of a vapor intrusion condition at the site. Given the age of the building on site, asbestos-containing materials (ACM) and/or lead based paint (LBP) may be present at the site (Appendix I).

As part of the Phase I ESA, a database search report was obtained from Environmental Data Resources Inc. (EDR) and found that the Project site was not identified in an environmental records/regulatory database search, and no evidence of recognized environmental conditions (RECs) was found in connection to the Project site. The site

reconnaissance did not identify RECs, historical RECs, or controlled RECs on-site. Various chemicals were observed onsite including cleaning supplies, asphalt resurfacing material, gasoline, lubricants, and paint. Additionally, staining was observed on the asphalt surfaces at the site, likely from leaking vehicles parked at the facility as well as food and drink spills. However, per the Phase I ESA, these features are not considered RECs, and no evidence of RECs was found in connection to the Project site, including in the Project site vicinity (Appendix I).

Surrounding Areas

Since the 1960's, the site is located in an area with a history of industrial uses. Facilities in the site vicinity were noted to use and store chemicals without evidence of release with the exception of a closed case for a release of oil from the adjacent facility to the east known as Western Construction Components and Circle K #2959 located approximately 0.20 miles to the south of the Project site. Additionally, the DTSC's Envirostor Database identified one site within the vicinity of the Project site: Ketema Process Equipment Co., C/O Baker Process located adjacent to the Project site approximately 0.03 miles to the east. The case was closed in 1997 (Appendix I).

Specific land uses located in the immediate vicinity of the Project site include the following:

- **North:** San Diego River, with residential uses beyond
- **East:** Industrial and manufacturing uses, and Mission Park Court
- **South:** Manufacturing and commercial uses, North Woodside Avenue, and SR-67
- **West:** Industrial and manufacturing uses, and Wheatlands Court

Schools

The closest schools to the Project site include Hill Creek Elementary School, located approximately 0.25 miles north of the Project site, and Santana High School, located approximately 0.65 miles northeast of the Project site.

Airports

The closest airport to the Project site is Gillespie Field Airport, located approximately 1.5 miles southwest of the Project site. The Project site is located within the Gillespie Field Airport Influence Area (AIA), Review Area 2, and the FAA Height Notification Boundary. The Project site is located outside of safety and noise zones for the Gillespie Field Airport (SDCRAA 2010).

Wildfire Risk

The Project site is designated as a Local Responsibility Area (LRA) CAL FIRE and not located within any Fire Hazard Severity Zones (FHSZ). However, properties directly adjacent to the Project site to the north and to the east are designated as Very High Fire Hazard Severity Zones (VHFHSZ) in LRA (CAL FIRE 2023). The City of Santee General Plan Safety Element describes the City as a medium fire hazard area due to the significant amount of vacant land and brush-covered hills (City of Santee 2003). Wildfire risks associated with the Project are discussed in Section 4.14, Wildfire, of this EIR.

4.7.2 Relevant Plans, Policies, and Ordinances

Federal

Federal Toxic Substances Control Act of 1976

The Federal Toxic Substances Control Act of 1976 tasked the U.S. Environmental Protection Agency (EPA) with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. The Federal Toxic Substances Control Act addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls, asbestos, radon, and lead-based paint (EPA 2022a).

Resource Conservation and Recovery Act of 1976

The objectives of the Resource Conservation and Recovery Act (RCRA) of 1976 are to protect human health and the environment from the potential hazards of waste disposal, conserve energy and natural resources, reduce the amount of waste generated, and ensure that wastes are managed in an environmentally sound manner. The Resource Conservation and Recovery Act affirmed and extended the "cradle-to-grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act. The Hazardous and Solid Waste Amendments of 1984 also added Subtitle I, which governs underground storage tanks (EPA 2022b).

Comprehensive Environmental Response, Compensation, and Liability Act of 1980

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List, which is a list of contaminated sites warranting further investigation by EPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986 (EPA 2023a).

Superfund Amendments and Reauthorization Act

The Superfund Amendments and Reauthorization Act amended CERCLA on October 17, 1986. The Superfund Amendments and Reauthorization Act had several changes and additions, including the following:

- Stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites
- Required Superfund actions to consider the standards and requirements found in other State and Federal environmental laws and regulations
- Provided new enforcement authorities and settlement tools
- Increased State involvement in every phase of the Superfund program

- Increased the focus on human health problems posed by hazardous waste sites
- Encouraged greater citizen participation in making decisions on how sites should be cleaned up
- Increased the size of the trust fund to $8.5 billion

The Superfund Amendments and Reauthorization Act also required the EPA to revise the Hazard Ranking System to ensure that it accurately assessed the relative degree of risk to human health and the environment posed by uncontrolled hazardous waste sites that may be placed on the National Priorities List (EPA 2023b).

Hazardous Materials Transportation Act

The U.S. Department of Transportation regulates hazardous materials transportation between states under the Code of Federal Regulations, Title 49, Chapter 1, Parts 100–185. In California, the California Department of Transportation (Caltrans) and the California Highway Patrol enforce federal law related to the transport of hazardous materials. Together, these agencies determine driver training requirements, load labelling procedures, and specifications for container types.

Occupational Safety and Health Act of 1970 and Occupational Safety and Health Administration

The Occupational Safety and Health Act of 1970 was passed to prevent workers from being killed or seriously harmed at work. The Occupational Safety and Health Act created the Occupational Safety and Health Administration (OSHA), which sets and enforces protective workplace safety and health standards. OSHA also provides information, training, and assistance to employers and workers. Under the Occupational Safety and Health Act, employers have the responsibility to provide a safe workplace (OSHA 2014).

Federal Aviation Administration Functions

The Federal Aviation Administration (FAA) has primary responsibility for the safety of civil aviation. The FAA's major functions regarding hazards include (1) developing and operating a common system of air traffic control and navigation for both civil and military aircraft, (2) developing and implementing programs to control aircraft noise and other environmental effects of civil aviation, (3) regulating U.S. commercial space transportation, (4) researching and developing the National Airspace System and civil aeronautics, (5) regulating civil aviation to promote safety, and (6) encouraging and developing civil aeronautics, including new aviation technology (FAA 2023a).

Federal Response Plan

The Federal Response Plan of 1999 (FEMA 1999) is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

State

Hazardous Materials Management Act

Requires that businesses handling or storing certain amounts of hazardous materials prepare a hazardous materials business plan, which includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program.

Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

Requires the governor to publish and update, at least annually, a list of chemicals known to the state to cause cancer, birth defects, or other reproductive harm and to inform citizens about exposures to such chemicals.

Hazardous Waste Management Planning and Facility Siting, also known as the Tanner Act (Assembly Bill 2948, 1986)

Requires counties to prepare, for California Department of Toxic Substance Control (DTSC) approval, hazardous waste management plans and prescribes specific public participation activities, which must be carried out during the local land use permit process for siting new or expanding off-site commercial treatment, storage, and disposal facilities.

California Environmental Protection Agency

The boards, departments, and offices that make up the California Environmental Protection Agency (CalEPA) include the California Air Resources Board, the Department of Pesticide Regulation, the Department of Resources Recycling and Recovery, DTSC, the Office of Environmental Health Hazard Assessment, and the State Water Resources Control Board. These boards, departments, and offices were placed within the CalEPA "umbrella" to create a cabinet-level voice for the protection of human health and the environment (such as clean air, clean water, clean soil, safe pesticides, and waste recycling and reduction) to assure the coordinated deployment of state resources (CalEPA 2023a).

Cortese List/Government Code Section 65962.5

Pursuant to Government Code, Section 65962.5, environmental regulatory database lists are compiled to identify and locate properties with known hazardous substance contamination (California Government Code, Section 65960 et seq.). Four state agencies are required to provide lists of facilities that have contributed to, harbor, or are responsible for environmental contamination within their jurisdiction. The four state agencies that are required to provide these lists to the Secretary for Environmental Protection include DTSC, the State Department for Health Services, the State Water Resources Control Board, and the California Integrated Waste Management Board. The Secretary for Environmental Protection then takes each of the four respective agency lists and forms one list, referred to as the Hazardous Waste and Substances Site List – Site Cleanup (Cortese List), which is made available to every city and/or county in California (CalEPA 2023b).

California Occupational Safety and Health Administration

Cal/OSHA is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 California Code of Regulations [CCR], Sections 337–340). The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

California Hazardous Waste Control Law

The California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) is administered by CalEPA to regulate the management of hazardous wastes. While the California Hazardous Waste Control Law is generally more stringent than the Resource Conservation and Recovery Act, until EPA approves the California Hazardous Waste Control Program (which is charged with regulating the generation, treatment, storage, and disposal of hazardous waste), both the state and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

California Accidental Release Prevention Program

Similar to the Federal Risk Management Program, the California Accidental Release Prevention Program includes additional state requirements and an additional list of regulated substances and thresholds. The regulations of the program are contained in California Code of Regulations Title 19, Division 2, Chapter 4.5. The intent of the California Accidental Release Prevention Program is to prevent accidental releases of substances that can cause serious harm to the public and the environment, minimize the damage if releases do occur, and satisfy community right-to-know laws.

California Health and Safety Code

The handling and storage of hazardous materials is regulated by Division 20, Chapter 6.95, of the California Health and Safety Code. Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a hazardous materials business plan. Hazardous materials business plans contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state. Chapter 6.95 of the California Health and Safety Code establishes minimum statewide standards for hazardous materials business plans.

In addition, in the event that a facility stores quantities of specific acutely hazardous materials above the thresholds set forth by the California Health and Safety Code, facilities are also required to prepare a risk management plan and California accidental release plan. The risk management plan and California accidental release plan provide information on the potential impact zone of a worst-case release and require plans and programs designed to minimize the probability of a release and mitigate potential impacts (California Health and Safety Code, Chapter 6.95).

Title 24 California Building Standards Code

California Building Code

California Building Standards Code Title 24, Part 2 contains the California Building Code. California Building Code Chapter 7A regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a fire hazard area. Fire hazard areas as defined by the California Building Code include areas identified as a Fire Hazard Severity Zone (FHSZ) within a State Responsibility Area or a wildland–urban interface fire area. The purpose of Chapter 7A is to establish minimum standards for the protection of life and property by increasing the ability of structures located in a fire hazard area to resist the intrusion of flames or burning embers projected by a wildfire, and to contribute to a systematic reduction in structural losses from a

wildfire. New buildings located in such areas must comply with the ignition-resistant construction standards outlined in Chapter 7A.

California Fire Code

California Building Standards Code Title 24, Part 9 contains the California Fire Code (CFC), which incorporates by adoption the International Fire Code with necessary California amendments. The purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. CFC, Chapter 49 contains minimum standards for development in the wildland–urban interface and fire hazard areas.

The CFC and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The CFC is updated and published every 3 years by the California Building Standards Commission. The 2022 CFC took effect on January 1, 2023, and the City adopted the 2022 CFC with local amendments in November 2022.

California Code of Regulations, Title 14, Division 1.5

California Code of Regulations Title 14, Division 1.5, establishes the regulations for the California Department of Forestry and Fire Protection (CAL FIRE) and is applicable in all State Responsibility Areas—areas where CAL FIRE is responsible for wildfire protection. Most of the unincorporated area of San Diego County is a State Responsibility Area, and any development in State Responsibility Areas must comply with these regulations. Among other things, Title 14 Section 1270, et seq. establishes minimum standards for emergency access, fuel modification, setback to property line, signage, and water supply. The County of San Diego's (County) most recent adoption of the Consolidated Fire Code (2020) was certified by the State Board of Forestry, indicating that its code requirements meet or exceed Title 14 Section 1270 et seq., and with that certification, the County Consolidated Fire Code supersedes Title 14 Section 1270 et seq. in the unincorporated areas of the County.

California Emergency Services Act

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the EPA, California Highway Patrol, Regional Water Quality Control Boards (RWQCBs), air quality management districts, and county disaster response offices.

California Code of Regulations Title 5, Division 1, Chapter 13, Subchapter 1 – School Facilities Construction

California Code of Regulations Title 5, Division 1, Chapter 13, Subchapter 1 establishes minimum standards for siting of schools and school construction to provide safety for students and staff. The regulation establishes minimum distances that schools can be located from potential hazards such as power line easements and sets screening distances for other hazards that would require a safety study, such as a railroad track easement. Section 14010(h) states that schools shall not be located near an above-ground water or fuel storage tank or within 1,500 feet of the easement of an above-ground or underground pipeline that can pose a safety hazard as

determined by a risk analysis study. Section 14010(t) states that if the proposed site is on or within 2,000 feet of a significant disposal of hazardous waste, the school district shall contact DTSC for a determination of whether the property should be considered a hazardous waste property or border zone property and unsuitable for school development.

South Coast Air Quality Management District – Rule 1403

The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

Local

San Diego County Department of Environmental Health

The San Diego County Department of Environmental Health (DEH) serves to protect the environment and enhance public health by preventing disease, promoting environmental responsibility and, when necessary, enforcing environmental and public health laws. Within DEH, the Hazardous Materials Division (HMD) protects human health and the environment by ensuring that hazardous materials, hazardous waste, medical waste and underground storage tanks are properly managed. To accomplish this goal, HMD regulates facilities that handle or store hazardous materials, are part of the California Accidental Release Prevention Program, generate or treat hazardous wastes or medical waste, store at least 1320 gallons of aboveground petroleum, and own or operate underground storage tanks. DEH identifies disposal locations for household hazardous waste as well as scheduled household waste collection events (DEH 2023).

Regional Water Quality Control Board

The Regional Water Quality Control Board (RWQCB) implements the California Water Code, which regulates waste discharges to land. If a discharge of waste threatens a water of the state, a report of waste discharge or an application for a waiver of a report of waste discharge must be filed with the RWQCB. The RWQCB accomplishes its permitting responsibility by issuing either a general or site-specific permit (Waste Discharge Permit) or a waiver of a permit.

County of San Diego Emergency Operations Plan

The San Diego County Emergency Operations Plan is a comprehensive emergency management system that provides for a planned response to disaster situations associated with natural disasters, technological incidents, and nuclear defense operations. The Emergency Plan includes operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector (County of San Diego 2022).

County of San Diego, Consolidated Fire Code

The County, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001. The Consolidated Fire Code contains the County and fire protection districts amendments to the California Fire Code. The purpose of consolidation of the County and local fire districts' adoptive ordinances is to promote consistency in the interpretation and enforcement of the fire code for the protection of the public health and safety. The ordinances include permit requirements for the installation, alteration, or repair of new and existing fire protection systems, and penalties for violations of the Consolidated Fire Code. The Consolidated Fire Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management. Additionally, the Consolidated Fire Code regulates hazardous materials and associated measures to ensure that public health and safety are protected from incidents relating to hazardous substance releases. San Diego County's 2020 Consolidated Fire Code (the most recent adoption) was certified by the State Board of Forestry, resulting in its superseding California Code of Regulations Title 14, Section 1270 et seq., as it would otherwise apply within San Diego County (County of San Diego 2020).

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The San Diego County Multi-Jurisdiction Hazard Mitigation Plan was originally prepared in July 2010 and updated in October 2017 to meet federal and state requirements for disaster preparedness to make the County eligible for funding and technical assistance from state and federal hazard mitigation programs. The plan includes a risk assessment to enable local jurisdictions to identify and prioritize appropriate mitigation actions to reduce losses from potential hazards, including flooding, earthquakes, fires, and man-made hazards. To address potential hazards, the plan then incorporates mitigation goals and objectives, mitigation actions and priorities, an implementation plan, and documentation of the mitigation planning process for each of the 22 participating jurisdictions, including Santee (County of San Diego 2017).

California Disaster and Civil Defense Master Mutual Aid Agreement

As provided for in the California Emergency Services Act, the California Disaster and Civil Defense Master Mutual Aid Agreement was developed in 1950 and adopted by all 58 California counties. This statewide mutual aid system is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation. San Diego County is located in Mutual Aid Region 6 of the state system, which also includes Imperial, Riverside, San Bernardino, Inyo, and Mono Counties (OES 2017).

Airport Land Use Compatibility Plan- Gillespie Field

The San Diego County Regional Airport Authority, designated as the Airport Land Use Commission for all public airports in the County of San Diego, adopted the Gillespie Field Airport Land Use Compatibility Plan (ALUCP) January 25, 2010 (last amended December 20, 2010). The ALUCP assists in achieving compatible land use development in the area surrounding Gillespie Field airport. Gillespie Field is a general aviation reliever airport located within the City of El Cajon. The ALUCP designates the airport influence area and contains projected noise contours, flight activity zones, a land use compatibility matrix, and plan recommendations for areas surrounding Gillespie Field. The airport influence area is delineated by using the projected 60-decibel (dB) Community Noise Equivalent Level (CNEL) contour and is generally the area in which current and future airport-related noise, overflight, safety, and/or airspace protection factors may affect land uses or necessitate restrictions on uses. The airport influence area is divided into Review Area 1 and Review Area 2.

The composition of each area is determined as follows (SDCRAA 2010):

- Review Area 1 consists of locations where noise or safety concerns may necessitate limitations on the types of land use actions. Specifically, Review Area 1 encompasses locations exposed to aircraft noise levels of 60 dB CNEL or greater together with all of the safety zones identified in the ALUCP.
- Review Area 2 consists of locations beyond Review Area 1 but within the airspace and/or overflight notification areas. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2.

The Project site is within the Gillespie Field Airport Influence Area Review Area 2, overflight notification area, and the FAA Height Notification Boundary (SDCRAA 2010). The Project site is located outside of the noise exposure ranges and safety zones for the airport (SDCRAA 2010).

City of Santee Hazard Mitigation Plan

The purpose of the Hazard Mitigation Plan is to identify risks and ways to mitigate damage from natural and human-caused disasters. Goal 7 of the Plan, Hazardous Materials Release, outlines objectives and actions to monitor and prevent the release of hazardous materials, along with educational awareness to the public about the dangers (City of Santee 2023).

Santee General Plan

The City's General Plan contains objectives and policies aimed at minimizing potential risks associated with hazards and hazardous materials. The Safety Element of the General Plan aims to reduce loss of life, injuries, and damage to property resulting from natural and human-caused public safety hazards including flooding, geologic and seismic hazards, fire, traffic hazards and crime. Related objectives and policies of the Safety Element are listed below (City of Santee 2003).

Objective 3.0 Minimize the risk of damage to persons, property and the environment caused by hazardous materials.

Policy 3.1 The City shall continue to implement the County's Hazardous Waste Management Plan or develop and implement an equivalent plan.

Policy 3.2 The City shall continue to participate in the Hazardous Materials Incident Response Team in dealing with hazardous materials incidents.

Policy 3.3 The City shall require that any potential hazardous materials issues be fully investigated at the environmental review stage prior to project approval.

Policy 3.4 The City shall review any proposed uses involving the use, transport, storage or handling of hazardous waste to ensure that such uses will not represent a significant risk to surrounding uses or the environment.

Policy 3.5The City shall continue to provide for a household hazardous waste collection program for City residents as part of the contract with the City trash franchisee.

Policy 3.6The City shall control the location, manufacture, storage or use of hazardous materials in Santee through Zoning Ordinance implementation and the Development Review process.

Policy 3.7 Encourage safe and proper disposal of household hazardous waste.

Objective 4.0 Minimize injuries, loss of life and property damage resulting from fire hazards.

Policy 4.2 The City should ensure that all new development meets established response time standards for fire and life safety services.

Policy 4.4 The City shall require emergency access routes in all developments to be adequately wide to allow the entry and maneuvering of emergency vehicles.

Policy 4.8 Encourage and support the delivery of a high level of emergency services through cooperation with other agencies and use of available financial opportunities.

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.

Policy 4.10 Encourage the continued development, implementation and public awareness of fire prevention programs.

Policy 4.11 In order to minimize fire hazards, the Santee Fire and Life Safety Department shall routinely be involved in the review of development applications. Considerations shall be given to adequate emergency access, driveway widths, turning radii, fire hydrant locations and needed fire flow requirements.

Policy 4.12 The timing of additional fire station construction or renovation, or new services shall relate to the rise of service demand in the City and surrounding areas.

Policy 4.13 Support mutual aid agreements and communications links with County and the other municipalities participating in the Unified San Diego County Emergency Service Organization

Objective 7.0 Minimize injuries, loss of life, and property damage resulting from airport hazards.

Policy 7.1 The City should review all development proposed within the Gillespie Field Airport Influence Area to ensure that design features are incorporated into the site plan to address identified aircraft safety and noise hazards.

Santee Municipal Code

The Santee Municipal Code (SMC) is a compilation of the Santee City Charter and all regulatory and penal ordinances and certain administrative ordinances adopted by the City Council. The SMC includes Chapter 11.04, California Building Code, Chapter 11.18, California Fire Code, and Chapter 11.24, Construction and Improvement Standards (City of Santee 2023c).

4.7.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to hazards, hazardous materials, and wildfire are based on California Environmental Quality Act (CEQA) Guidelines Appendix G. According to CEQA Guidelines Appendix G, a significant impact related to the Project would occur if the Project would:

A. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
B. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
C. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
D. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
E. Be located within an airport land use plan, be within two miles of a public airport, and would result in a safety hazard or excessive noise for people residing or working in the Project area.
F. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
G. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

4.7.4 Impacts 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?

Construction Impacts

Less than Significant Impact. Construction of the proposed Project would involve the transport of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. However, hazardous materials are highly regulated in California, including the methods by which they are transported, used, and stored. All such uses of these substances would be subject to applicable and required regulatory controls as described above under Section 4.7.2. The proposed Project would be required to comply with all applicable federal, state, and local standards related to hazardous materials and wastes, such as controls on use, handling, storage, transportation, and disposal. Specifically, handling and storage of hazardous materials is regulated by Division 20, Chapter 6.95, of the California Health and Safety Code. Additionally, construction is temporary and use of these materials would cease upon completion. The use of these materials for their intended purpose would not pose a significant risk to the public or environment. Therefore, impacts would be **less than significant** during construction.

Operational Impacts

Less than Significant Impact. Upon completion of Project construction, the Project would involve the operation and maintenance of the industrial/warehouse facilities. The precise user/occupant of the warehouse is not known at this time. Operation of the Project could involve the use of industrial-grade chemicals and commercially available

cleaning products, landscaping chemicals and fertilizers, and various other commercially available products during the day-to-day operation of the facilities. While these materials could be stored on the Project site, storage would be required to comply with the guidelines established by the manufacturer's recommendations. Consistent with federal, state, and local requirements, the transport, removal, and disposal of hazardous materials from the Project site would be conducted by a permitted and licensed service provider. Any handling, transport, use, or disposal must comply with all applicable federal, state, and local agencies and regulations, including the EPA, Department of Toxic Substances Control, CAL/OSHA, RCRA, and the Santee Fire Protection District.

As mentioned in the General Plan, the City is under the jurisdiction of the Hazardous Material Division of the County of San Diego's Department of Environmental Health, which assists regulated businesses in the City in developing their business plans, as well as developing an area plan for hazardous material emergency response coordination in the City and County (City of Santee 2003). Although the proposed Project could result in the increase in routine transport, use and disposal of hazardous materials and/or wastes, all hazardous materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Therefore, impacts would be **less than significant** during operation.

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?

Construction Impacts

Less than Significant Impact. As discussed under Threshold A, construction of the Project could involve the transport of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. Construction materials would be used and stored in designated construction staging areas within the Project site boundaries and materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use.

The Phase I ESA notes that due to the age of the on-site buildings and structures, it is likely that asbestos-containing materials (ACM) were used in their construction. Demolition of these buildings and structures can cause encapsulated ACM to become friable and, once airborne, would be considered a carcinogen. A carcinogen is a substance that causes cancer or helps cancer grow. Such releases could pose significant risks to persons living and working in and around the project area, as well as to project construction workers. Due to this likelihood of ACMs being present in existing on-site buildings, as required by the National Emission Standards for Hazardous Air Pollutants (NESHAP) For Asbestos a pre-demolition ACM survey would be conducted prior to any disturbance of suspected ACMs (EPA 2024).

Abatement of all ACM encountered during any future building demolition activities would be required to be conducted in accordance with all applicable laws and regulations, including those of the EPA (which regulates disposal), OSHA, U.S. Department of Housing and Urban Development, Cal/OSHA (which regulates employee exposure), and SCAQMD.

For example, the EPA requires that all asbestos work performed within regulated areas be supervised by a person who is trained as an asbestos supervisor (EPA Asbestos Hazard Emergency Response Act, 40 CFR 763). SCAQMD's Rule 1403 requires that buildings undergoing demolition or renovation be surveyed for ACM prior to any demolition or renovation activities. Should ACM be identified, Rule 1403 requires that ACM be safely removed and disposed of at a regulated disposal site, if possible. If it is not possible to safely remove ACM, Rule 1403 requires that safe procedures be used to demolish the building with asbestos in place without resulting in a significant release of

asbestos to the environment. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of Title 8 of the California Code of Regulations, Section 1529 (Asbestos), which provides the exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to asbestos.

Due to the age of on-site buildings, the Phase 1 ESA also noted lead-based paint (LBP) was likely used in construction of onsite structures. Proposed demolition of existing structures may pose a risk of exposure of workers to lead-based paint present in building materials. In compliance with Cal/OSHA regulations, surveys for indicators of lead-based coatings, and flakes in soil, would be conducted before demolition to further characterize the presence of lead on the project site. Loose or peeling paint may be classified as a hazardous waste if concentrations exceed total threshold limits. Cal/OSHA regulations require air monitoring, special work practices, and respiratory protection during demolition and paint removal where even small amounts of lead have been detected.

Mandatory compliance with these regulatory requirements would ensure that construction workers and the public are not exposed to ACM and LBP health hazards during demolition. Therefore, impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during construction of the Project would be **less than significant**.

Operational Impacts

Less than Significant Impact. Once Project construction is complete, the transport, use, or disposal of hazardous materials could include industrial-grade chemicals and commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available products associated with industrial/warehouse uses. As previously discussed, all hazardous materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Therefore, impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during operation of the Project would be **less than significant**.

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?

Less than Significant Impact. The only existing school located within one-quarter mile of the site is Hill Creek Elementary School, located approximately 0.25 miles north of the Project site. The next closest existing school near the Project site is Santana High School, located approximately 0.65 miles northeast of the Project site. As discussed in Section 4.2, Air Quality of this Draft EIR, construction, and operation of the project would also result in less than significant impacts to air quality. As discussed in Thresholds A and B, above, construction materials would be used and stored in designated construction staging areas within the Project site boundaries and materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use. Additionally, all hazardous materials used during operation of the Project would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. As discussed above under Threshold A, the proposed Project would result in less-than-significant impacts related to the routine transport, use, or disposal of hazardous materials, and discussed above under Threshold B, the proposed Project would result in less-than-significant impacts related to the reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Therefore, impacts to schools within one-quarter mile of the project site would be **less than significant**.

D. Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Less than Significant Impact. As outlined in Section 4.7.1, Existing Conditions, a database search report was obtained from EDR, which documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials. The results of the database search found that the Project site was not identified by EDR on any government list of hazardous materials (Appendix I).

However, the State Water Resources Control Board's GeoTracker Database identified two listed sites within the vicinity of the Project site: Western Construction Component (T0608164832), located adjacent to the Project site approximately 0.03 miles to the east, and Circle K #2959 (T0608102609), located approximately 0.20 miles to the south of the Project site. The Western Construction Component Cleanup Program Site is a completed case, as of 1997, with waste oil/ motor/ hydraulic/ lubricating potential contaminants of concern. The Circle K #2959 Cleanup Program Site is a completed case as of 1999, with gasoline potential contaminants of concern (SWRCB 2023). Additionally, the DTSC's Envirostor Database identified one site within the vicinity of the Project site: Ketema Process Equipment Co., C/O Baker Process (71003382), located adjacent to the Project site approximately 0.03 miles to the east. Ketema Process Equipment Co., C/O Baker Process is a Tiered Permit Cleanup Site with no action required as of 1998 (DTSC 2023).

Although some facilities located near the project site have been previously included in government databases related to hazardous materials, as discussed above, these facilities are closed cases and would not have adverse impacts on the Project (for further information regarding databases refer to Appendix I). Therefore, impacts associated with the Project being located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be **less than significant**.

E. Would the Project be located within an airport land use plan, be within two miles of a public airport, and result in a safety hazard or excessive noise for people residing or working in the Project area?

Less than Significant Impact. The nearest airport to the Project site is the Gillespie Field Airport, which is located approximately 1.5 miles southwest of the Project site. As discussed in Section 4.7.1, the Project site is located outside of the noise exposure ranges and safety zones for the airport (SDCRAA 2010).

The Project site falls within Gillespie Field Review Area 2, which requires limitations on the height of structures (i.e., any proposed object in an area of terrain penetration to airspace surface which has a height greater than 35 feet above ground level). The Project site also falls within the FAA Height Notification Boundary. Within this boundary, the Federal Aviation Administration (FAA) shall be notified of any proposed construction or alteration having a height greater than an imaginary surface extending 100 feet outward and 1 foot upward (slope of 100 to 1) from the runway elevation. Review Area 2 also requires overflight notification documents for residential uses; however, no residential uses are proposed so no conflict would occur. To ensure compliance with Gillespie Field Review Area 2 requirements and FAA Height Notification boundaries, ALUC review and FAA Notification of the Project would be required. The Project applicant has received documentation from the FAA stating that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided certain conditions are included in the Project (FAA 2023b). Therefore, implementation of the proposed project would result in a **less than significant** impact related to airspace safety hazards or conflicts with the Gillespie Airport Land Use Compatibility Plan.

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

Less than Significant Impact. The proposed Project may result in a temporary increase in traffic on roadways surrounding the Project site due to increased truck loads or the transport of construction equipment to and from the Project site during the construction period. All construction activities including staging would occur in accordance with City requirements which would ensure that adequate emergency access would be provided during construction of the Project.

Emergency response to the Project site would be serviced by the Santee Fire Department, San Diego County Sheriff's Department, and other responsible agencies. Furthermore, the City is part of San Diego County Emergency Operations Plan (EOP), which discusses evacuation procedures in the event of an emergency. As stated in the Emergency Operations Plan, primary evacuation routes consist of the major interstates and prime arterials. As previously stated, all construction activities including staging would occur in accordance with City requirements, which would ensure that adequate emergency access would be provided during construction of the Project. Additionally, Project construction would not require the road closures. Construction of the Project is not anticipated to interfere with an adopted emergency response plan or evacuation plan, nor would it substantially impede public access or roadway circulation.

Direct access to the Project site would be provided via N. Woodside Avenue. The existing driveway currently bordering the east and south side of the Project site would be extended to loop around the entire project site in order to allow fire lane access from all sides of the building. Consistent with the Santee Fire Department access requirements, all Project driveways have been designed to allow for minimum turning radii. Signage and striping would be provided to demarcate fire lanes and clear spaces throughout the site. All gated entryways would include rapid-access Knox boxes to provide emergency access to gated areas. Additionally, road improvements would be constructed to current Fire Codes and City of Santee standards for public and private roads.

Therefore, the Project would not interfere with an adopted emergency response or emergency evacuation plan during construction or operation activities; impacts would be **less than significant**.

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

As discussed in Section 4.7.1, above, the California Department of Forestry and Fire Protection's (CAL FIRE) Fire Hazard Severity maps indicate that the Project site is not classified as a VHFHSZ in LRA, however the Project site is bordered to the north and east by land classified as very high under the LRA. Additionally, there is State Responsibility Area land classified as very high less than one mile northeast of the project site. The Project site is bordered to the north by Open Space and the San Diego River. This area is comprised of various vegetation communities and land covers, described in Section 4.3 Biological Resources, that may exacerbate fire risk.

Construction

Less than Significant Impact. The Project would involve the demolition of all existing on-site structures and the construction of a 300,145 square foot industrial/warehousing building. The Project would include 290,145 square feet of warehouse space and 10,000 square feet of office space, as well as associated improvements including loading docks, trailer stalls, passenger vehicle parking spaces, and street, sidewalk, and landscape improvements. Construction of the Project would introduce potential ignition sources to the Project site, including the use of heavy

machinery and the potential for sparks during welding activities or other hot work. However, the Project would be required to comply with the California Fire Code (CFC) and California Building Code (CBC) standards to reduce the possibility of fires during construction activities. The Project would comply with CFC Section 3304 for precautions against fire during construction activities. Access for firefighting would be maintained throughout construction per CFC Section 3310.1. Any motorized equipment within the site would comply with fire protection regulations outlined in CFC Section 3316. Adherence to City and state regulatory standards during Project construction would reduce the risk of wildfire ignition and spread during construction activities. In the case of accidental ignition, the site is required to have no less than one portable extinguisher at each level where combustible materials have accumulated, in every storage or construction shed, and where any additional hazards exist (CFC Section 3315). Therefore, short-term construction impacts associated with exposing people or structures to a significant risk of loss, injury, or death involving wildland fires would be **less than significant**.

Operation

Less than Significant Impact. During operation, the Project would adhere to the City's Municipal Code and the CFC. The Project would be required to have and maintain fire protection and life safety systems (CFC Chapter 9). The Project would not facilitate wildfire spread or exacerbate wildfire risk or expose people or structures, indirectly or directly, to significant wildfire risk. It is not anticipated that the Project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose Project occupants to pollutant concentrations from a wildfire, the uncontrolled spread of a wildfire, or significant risks associated with wildfires. Therefore, long-term operational impacts associated with exposing people or structures to a significant risk of loss, injury, or death involving wildland fires would be **less than significant**.

4.7.5 Mitigation Measures and Level of Significance After Mitigation

All impacts related to hazards and hazardous materials would be less than significant. No mitigation is required.

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4.8 Hydrology and Water Quality

This section describes the existing hydrology and water quality conditions of the Palisade Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to implementation of the Project.

In addition to the documents incorporated by reference (see Section 2.7, Documents Incorporated by Reference, of Chapter 2, Introduction, of this Draft EIR), the following analysis is based, in part, on the following sources:

- *Preliminary Hydrology Study for Palisade Santee Business Center,* prepared by DRC Engineering, Inc. in January 2024 (Appendix J-1)
- City of Santee Priority Development Project (PDP), Storm Water Quality Management Plan (SWQMP), prepared by DRC Engineering, Inc. in March 2023 (Appendix J-2)
- Letter to City of Santee regarding the 100-Year Floodplain, by DRC Engineering, Inc. in July 2023 (Appendix J-3)

4.8.1 Existing Conditions

Regional Watershed

The U.S. Geological Survey Watershed Boundary Dataset delineates watersheds according to hydrologic units, which are nested within one another according to the scale of interest. The U.S. Geological Survey identifies hydrologic units by name and by hydrologic unit code (HUC). For example, at a statewide scale, hydrologic units consist of large regions and sub-regions draining to a common outlet. At a statewide scale, the proposed Project is within the 11,100-square-mile "Southern California Coastal" subregion (HUC 1807), which identifies areas that eventually drain to the Pacific Ocean versus those that drain to the interior deserts of California. At the highest level of detail for the Watershed Boundary Dataset, the Project site is located within the San Diego River Watershed Management Area (WMA) (Figure 4.8-1, San Diego River Watershed) (County of San Diego 2023).

More specifically, the Project site is located in U.S. Geological Survey-designated San Diego Hydrologic Unit (907), Lower San Diego Hydrologic Area (907.1), Santee Subwatershed (907.12) (Appendix J-2). The San Diego River Watershed originates in the mountains of east San Diego County, near Julian, and drains to the Pacific Ocean in Ocean Beach. The watershed encompasses 434 square miles, making it the second largest watershed management area in San Diego County. The watershed borders Los Penasquitos and San Dieguito River Watersheds to the north and San Diego Bay watershed management area to the south. Currently, about 44% of the San Diego Watershed is undeveloped; 23% consists of open space and park; 19% is residential; 6% transportation uses; and 2% other uses. The San Diego Watershed supplies approximately 760,000 individuals with potable water sourced from one of five reservoirs, including Lake Murray, Lake Jennings, San Vicente, El Capitan, and Cuyamaca Reservoirs. The majority of these reservoirs are located in the eastern half of the San Diego Watershed, upstream from the Lower San Diego Hydrologic Area (Project Clean Water 2022).

Topography and Drainage

The Project site is located on relatively flat to gently sloping topography, immediately south of the San Diego River. The topography slopes toward the river, from south to north, with a change in topography of a few feet (Appendix G). Drainage on-site occurs as sheet flow towards the northwest portion of the site and into the San Diego River

over natural terrain, with no on-site storm drains (Figure 4.8-2, Existing Hydrology Map). Approximately 3.5 acres of offsite run-on currently flows onto the site. An existing 24-inch culvert located under Interstate 67 outlets at the entrance of the site, off of Woodside Avenue. This culvert collects approximately 2.8 acres from the freeway as well as the southern portion of Woodside Drive. An additional 0.7 acres covering the northern portion of Woodside Drive collects in the curb and gutter, from south of Wheatlands Drive, and outlets at the existing entrance of the site. In total, approximately 16.8 acres of tributary area, including on-site runoff and run-on, flows to the northwest portion of the Project site (Appendix J-1, Hydrology Study).

Beneficial Uses and Total Maximum Daily Loads

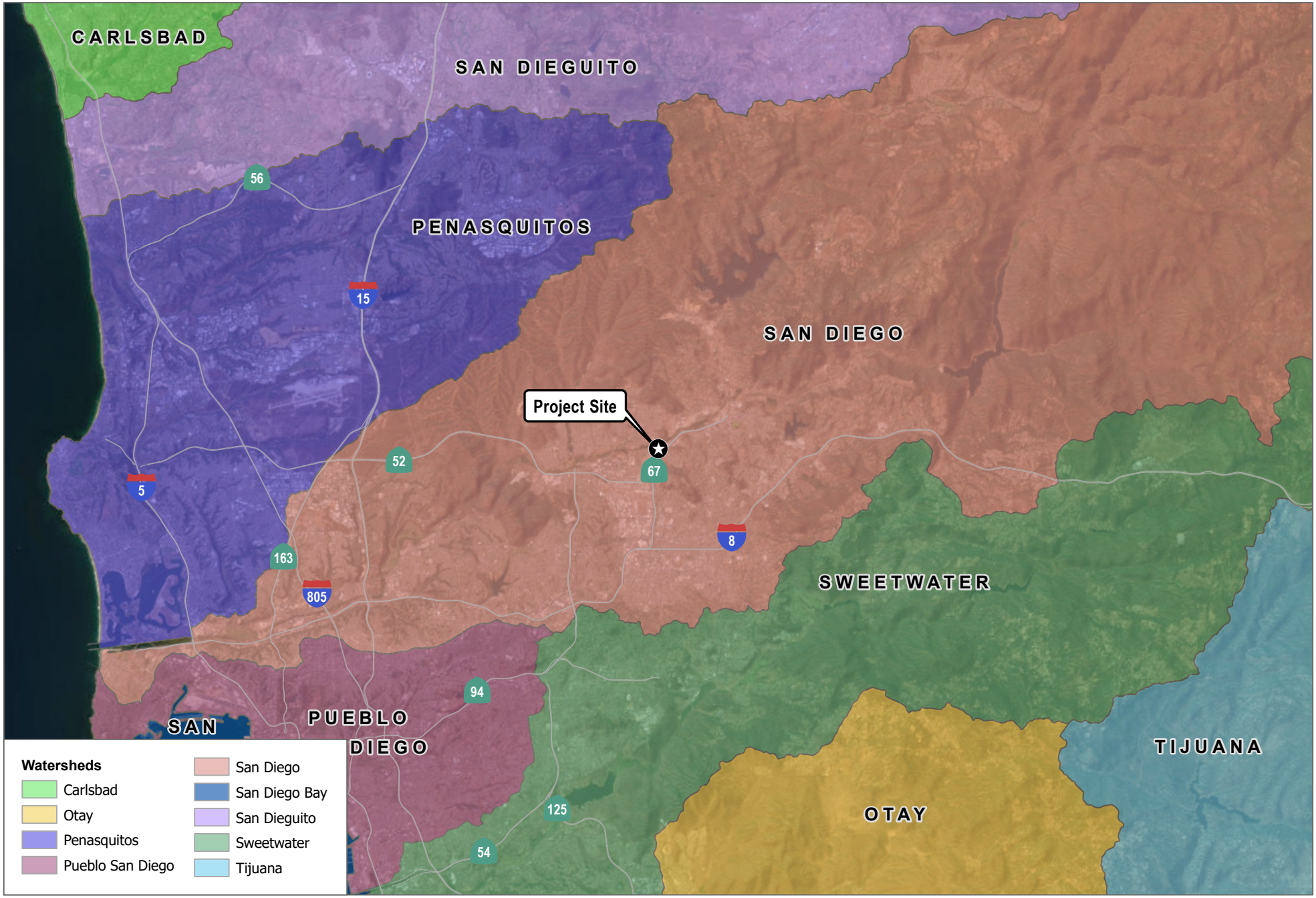
The State Water Resources Control Board (SWRCB) establishes statewide water quality control policy and regulation. The SWRCB also oversees the nine Regional Water Quality Control Boards (RWQCBs) in California, which are responsible for designating beneficial uses, establishing water quality objectives to protect those uses, and identifying programs of implementation to meet objectives through the preparation of a basin plan. The Water Quality Control Plan for the San Diego Basin (Basin Plan) (San Diego RWQCB 2021) lists beneficial uses of major water bodies within the region. San Diego River is an inland surface water body with designated beneficial uses in the Basin Plan. Existing beneficial uses are summarized in Table 4.8-1, Basin Plan Beneficial Uses, Surface Water, and descriptions of the beneficial use categories are as follows:

- **AGR:** Agricultural supply waters used for farming, horticulture, or ranching.
- **COLD:** Freshwater Habitat that support cold water ecosystems including the preservation or enhancement of aquatic habitats, vegetation, fish or wildlife, and invertebrates.
- **IND:** Industrial activities that do not depend primarily on water quality.
- **MUN:** Community, military, or individual water supply systems including, but not limited to, drinking water supply.
- **PROC:** Industrial process supplies that includes the use of water for industrial activities that depend primarily on water quality.
- **RARE:** Waters that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.
- **REC1:** Water contact recreation involving body contact with water and ingestion is reasonably possible.
- **REC2:** Non-contact water recreation for activities in proximity to water, but not involving body contact.
- **WARM:** Warm freshwater habitat to support water ecosystems.
- **WILD:** Wildlife habitat water that support terrestrial or wetland ecosystems.

Table 4.8-1. Basin Plan Beneficial Uses, Surface Water

Water Body	Beneficial Uses									
	MUN	AGR	IND	PROC	REC1	REC2	WARM	COLD	WILD	RARE
San Diego River	X	X	X	X	X	X	X	X	X	X

Source: Table 2-2 of San Diego RWQCB 2021.



SOURCE: ESRI 2022, Open Street Maps 2019, Project Clean Water 2022

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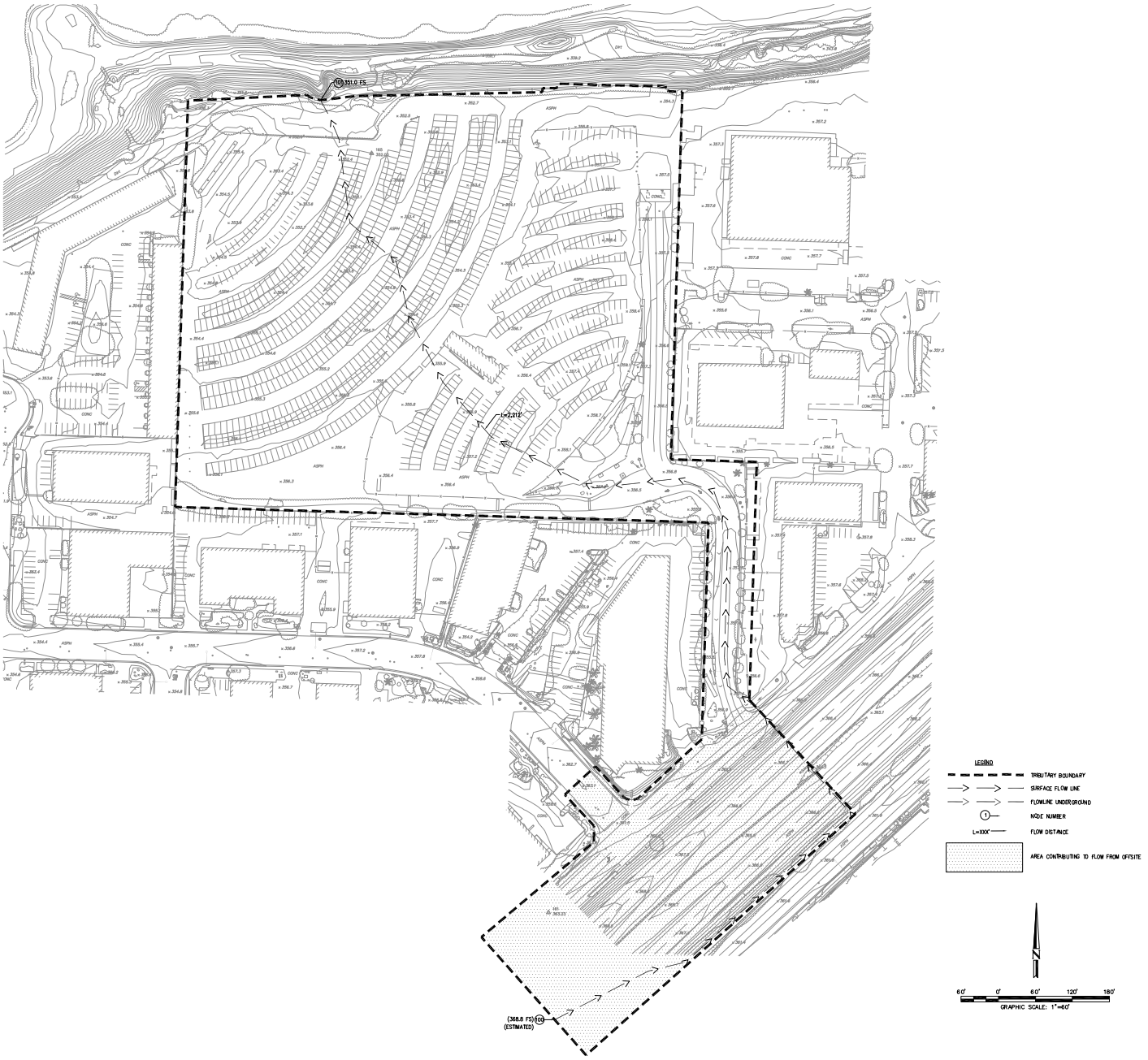
0 2 4 Miles

FIGURE 4.8-1

San Diego River Watershed

Palisade Santee Commerce Center Project

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SOURCE: DRC Engineering 2024

FIGURE 4.8-2

Existing Hydrology Map

Palisade Santee Commerce Center Project

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The Project site is located adjacent to the Upper San Diego River, per classification by the SWRCB. Based on the 2014/2016 California Integrated Report, Clean Water Act (CWA) Section 303(d) List/305(b) Report, pollutants in this stretch of the river include indicator bacteria and dissolved oxygen. Total maximum daily loads (TMDLs) have been established for both of these pollutants (SWRCB 2023a).

General Watershed Water Quality

Of the hydrologic areas located within the San Diego River Watershed, the Lower San Diego Hydrologic Area is the most urbanized and suffers from the most pronounced water quality problems. At approximately 110,000 acres, this hydrologic area is the largest and represents approximately 40% of the watershed. Due to its geographic extent, oversight of the storm drain systems within the Lower San Diego Hydrologic Area falls on a number of Co-permittees, including the County of San Diego, in combination with the Cities of Santee, El Cajon, La Mesa, and San Diego. At the point where the San Diego River meets the Pacific Ocean in Ocean Beach, lies a 37-acre wetland, Famosa Slough, which is managed by the City of San Diego (Project Clean Water 2022).

Water quality data were collected along the lower San Diego River from 2004 through 2018 for several pollutants of concern including conventional parameters, nutrients, metals, pathogen indicators, and municipal supply constituents. The selected general constituents examined include dissolved oxygen (DO), turbidity, total dissolved solids (TDS), total suspended solids (TSS), and oil and grease. DO is a measure of the amount of gaseous oxygen dissolved in the water. Turbidity is a measure of suspended matter that interferes with the passage of light through the water or in which visual depth is restricted. TDS measures the dissolved cations and anions in water, primarily inorganic salts (calcium, magnesium, potassium, sodium, chlorides, and sulfates). High TDS levels can impair agricultural, municipal supply, and groundwater recharge beneficial uses. TSS measures the particulate matter suspended in water. Oil and grease is a measure of fats, oils, waxes, and other related constituents in water (Geosyntec 2019; SDSU 2020).

The data collected along the lower San Diego River indicate that the lower San Diego River may not be meeting water quality standards for DO over the study period (2004–2018) during the dry season. The Basin Plan objective states that the annual mean DO concentration should not be less than 7 milligrams per liter (mg/L) more than 10% over the study period. All of the DO measurements collected were less than 7 mg/L; however, only six measurements were collected over the 11-year span. Water quality data for turbidity indicate that the Basin Plan standard of 20 Nephelometric Turbidity Units (NTU) is being met along the lower San Diego River for the wet season and the dry season. Average turbidity measures during the wet season and the dry season are 4.63 NTU and 3.72 NTU, respectively. The Basin Plan does not identify a numeric standard for TSS, and the available TSS data do not indicate that TSS is a cause of "nuisance or adverse effects to beneficial waters." Oil and grease data were collected on four occasions between 2013 and 2014. All oil and grease results were below the reporting limit, indicating that concentrations are not at levels that would "cause nuisance or which otherwise adversely affect beneficial uses" (Geosyntec 2019; SDSU 2020).

Water Supply

As discussed in more detail in Section 4.13, Utilities and Service Systems, domestic water service is provided to the Project area by the Padre Dam Municipal Water District (PDMWD). The primary potable water supply source within the PDMWD's service area is imported water from the San Diego County Water Authority, through three connections. The potable water supply is imported from the California State Water Project and the Colorado River by Metropolitan Water District of Southern California. In addition, the San Diego County Water Authority purchases up to 50,000 acre-feet per year from the Carlsbad Desalination Plant. The PDMWD's water supplies also include

recycled water and a very small amount of groundwater from one well in the Santee Basin, which supplements the recycled water system. The well is unreliable; therefore, groundwater supplies from the well are assumed to not be available as a future supply and the PDMWD has no plans for other groundwater supplies in the future (PDMWD 2021). In 2022, groundwater comprised 6% of the water supplies from the San Diego County Water Authority. By 2045, groundwater is expected to comprise 4% of their water supply (PDMWD 2023).

Groundwater

All major watersheds in the San Diego region contain groundwater basins, which are defined as a hydrogeologic unit containing one large aquifer, as well as several connected and interrelated aquifers. The San Diego River WMA contains three groundwater basins: Mission Valley, San Diego River Valley, and El Cajon Valley. The Project site overlies the San Diego River Valley Groundwater Basin, which consists of alluvium deposited by the San Diego River and its tributaries. The basin is surrounded by contacts with semi-permeable rocks of the Eocene Poway Group, impermeable Cretaceous crystalline rock, and impermeable Jurassic to Cretaceous Santiago Peak volcanic rocks. The Quaternary alluvium forms the principal water-bearing unit within the basin (California DWR 2004).

The San Diego River Valley Groundwater Basin is classified as a very low priority basin with respect to the Sustainable Groundwater Management Act (SGMA). Overall, groundwater only accounts for about 5% of the San Diego region's water supply portfolio. Local groundwater supplies are limited by several factors, including little recharge due to sparse rainfall (San Diego County Water Authority 2023; SWRCB 2023b). The San Diego River Valley Groundwater Basin only includes five water supply wells and groundwater only accounts for approximately 4% of the water supply in the basin. With respect to SGMA, groundwater supply in the San Diego River Valley Basin is within the jurisdiction of the San Diego River Valley Groundwater Sustainability Agency (Groundwater Exchange 2023; SWRCB 2023b).

Groundwater Quality

Groundwater in the alluvial aquifer of the San Diego River Valley Groundwater Basin varies in character. The eastern portion of the basin contains water of a bicarbonate character, while the western portion contains water of a chloride character. TDS content ranges from 260 to 2,870 mg/L, with higher values to the west and lower values to the east. The Department of Health Services data for two wells show the TDS concentration ranging from 591 to 870 mg/L (California DWR 2004).

The Basin Plan designates existing or potential beneficial uses for the San Diego River Valley Groundwater Basin beneath the Project site. Existing beneficial uses are summarized in Table 4.8-2, Basin Plan Beneficial Uses, Groundwater (San Diego RWQCB 2021).

Table 4.8-2. Basin Plan Beneficial Uses, Groundwater

Water Body	Beneficial Uses							
	AGR	IND	REC1	REC2	BIOL	WARM	WILD	RARE
San Diego River Valley Groundwater Basin	X	X	X	X	X	X	X	X

Source: Table 2-5 of San Diego RWQCB 2021.

Flood Hazards

As illustrated in Figure 4.8-3, Flood Map, the northern boundary of the Project site is adjacent to a regulatory floodway (FEMA 2023). The Project site has been designed to match the existing contours along the San Diego River as to not impact the existing floodplain, and the Project building will be held more than one foot above the floodplain in accordance with City of Santee Flood Damage Prevention Ordinance, Chapter 11.36. The Project will not impact the FEMA floodplain.

4.8.2 Relevant Plans, Policies, and Ordinances

Federal

Clean Water Act

The Clean Water Act (CWA), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality (33 USC 1251 et seq.). The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." The CWA establishes basic guidelines for regulating discharges of both point and non-point sources of pollutants into the waters of the United States. The CWA requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA. Relevant sections of the CWA are as follows:

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Under Section 303(d) of the CWA, the State of California is required to develop a list of impaired water bodies that do not meet water quality standards and objectives. California is required to establish TMDLs for each pollutant/stressor. A TMDL defines how much of a specific pollutant/stressor a given water body can tolerate and still meet relevant water quality standards. Once a water body is placed on the Section 303(d) List of Water Quality Limited Segments, it remains on the list until a TMDL is adopted and the water quality standards are attained or there is sufficient data to demonstrate that water quality standards have been met and delisting from the Section 303(d) list should occur.
- Section 401 (Water Quality Certification) requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the CWA. This process is known as the Water Quality Certification/Waste Discharge Requirements process.
- Section 402 (National Pollutant Discharge Elimination System) establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the SWRCB and the nine RWQCBs, which have several programs that implement individual and general permits related to construction activities, stormwater runoff quality, and various kinds of non-stormwater discharges.
- Section 404 (Discharge of Dredged or Fill Material into Waters of the United States) establishes a permit program for the discharge of dredged or fill material into waters of the United States. This permit program is jointly administered by the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency (EPA).

Numerous agencies have responsibilities for administration and enforcement of the CWA. At the federal level this includes EPA, the U.S. Army Corps of Engineers, the Bureau of Reclamation, and the major federal land management agencies, such as the U.S. Forest Service and the Bureau of Land Management. At the state level, with the exception of tribal lands, the California Environmental Protection Agency and its sub-agencies, including

the SWRCB, have been delegated primary responsibility for administering and enforcing the certain provisions of the CWA in California. At the local level, the San Diego RWQCB, municipalities, and special districts have implementation and enforcement responsibilities under the CWA.

Federal Antidegradation Policy

The federal Antidegradation Policy (40 CFR 131.12) is designed to protect water quality and water resources. The policy requires states to develop statewide antidegradation policies and identify methods for implementing those policies. State antidegradation policies and implementation measures must include the following provisions: (1) existing instream uses and the water quality necessary to protect those uses shall be maintained and protected; (2) where existing water quality is better than necessary to support fishing and swimming conditions, that quality shall be maintained and protected unless the state finds that allowing lower water quality is necessary for important local economic or social development; and (3) where high-quality waters constitute an outstanding national resource, such as waters of national and state parks, wildlife refuges, and waters of exceptional recreational or ecological significance, that water quality shall be maintained and protected. State permitting actions must be consistent with the federal Antidegradation Policy.

California Toxics Rule

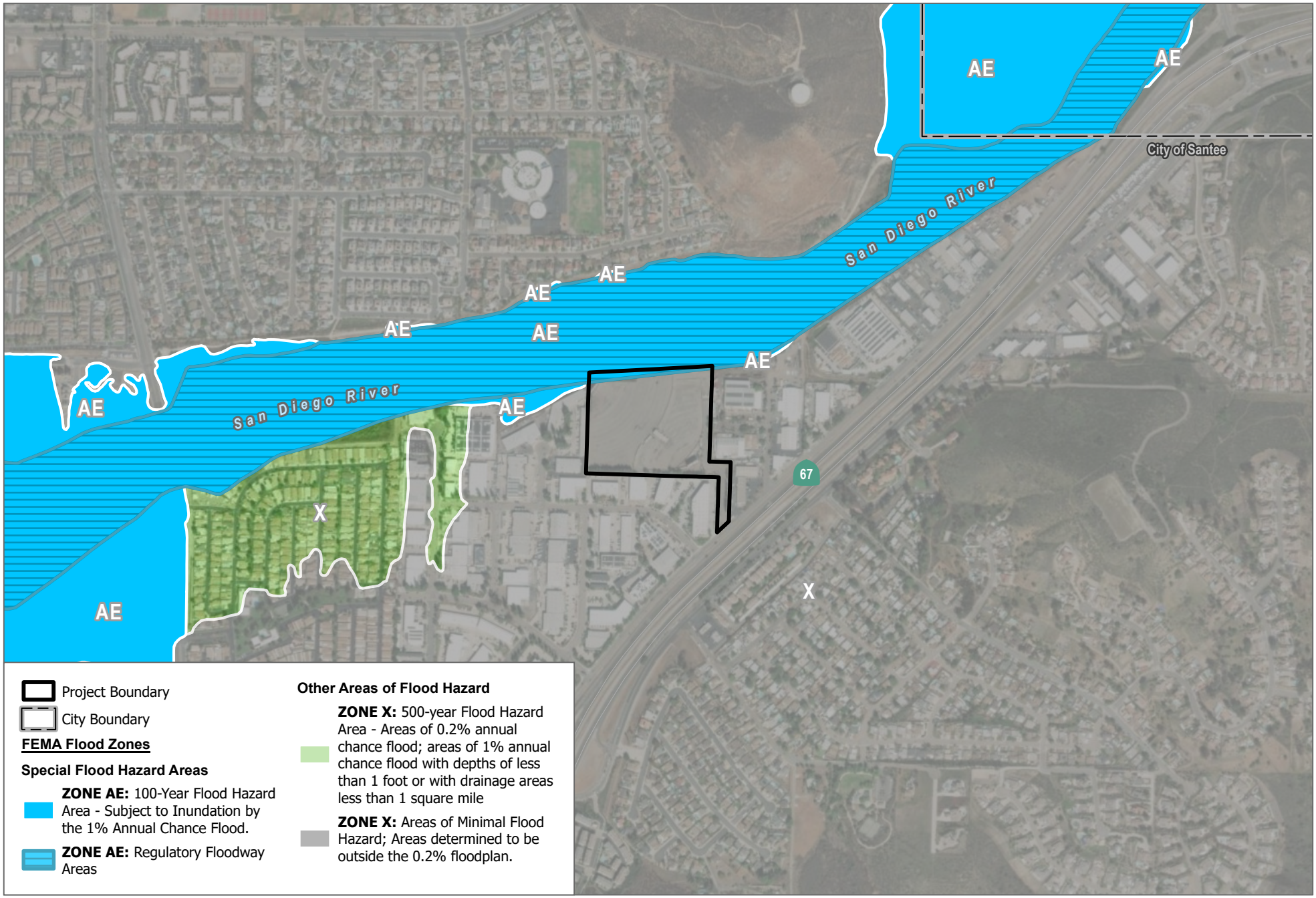
The California Toxics Rule is a federal regulation issued by EPA providing water quality criteria for potentially toxic constituents in receiving waters with human health or aquatic life designated uses in the State of California. EPA adopted the California Toxics Rule in 2000 to create legally applicable water quality criteria for priority toxic pollutants for inland surface waters, enclosed bays, and estuaries to protect human health and the environment for all purposes and programs under the CWA. The California Toxics Rule aquatic life criterion were derived using a CWA Section 304(a) method that produces an estimate of the highest concentration of substances in water that do not present a significant risk to the aquatic organisms in the water and their uses. The California Toxics Rule water quality criteria provide a reasonable and adequate amount of protection with only a small possibility of substantial overprotection or under protection.

State

Porter-Cologne Water Quality Control Act

The Porter–Cologne Water Quality Control Act (codified in the California Water Code, Section 13000 et seq.) is the primary water quality control law for California. Whereas the CWA applies to all waters of the United States, the Porter–Cologne Act applies to waters of the state,[1] which includes isolated wetlands and groundwater in addition to federal waters. The Porter-Cologne Act grants the SWRCB and the nine RWQCBs power to protect water quality and is the primary vehicle for implementation of California's responsibilities under the federal CWA. The Porter-Cologne Act also grants the SWRCB and the nine RWQCBs authority and responsibility to adopt plans and policies, to regulate discharges of waste to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. Further, the Porter–Cologne Act establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

[1] "Waters of the state" are defined in the Porter–Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code, Section 13050[e]).



SOURCE: ESRI 2022, Open Street Maps 2019, FEMA 2023

DUDEK

0 500 1,000 Feet

FIGURE 4.8-3

Flood Map

Palisade Santee Commerce Center Project

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The act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. California Water Code Section 13260(a) requires that any person discharging waste or proposing to discharge waste, other than to a community sewer system, that could affect the quality of the waters of the state, to file a Report of Waste Discharge with the applicable RWQCB. For discharges directly to surface water (waters of the United States), an NPDES permit is required, which is issued under both state and federal law; for other types of discharges, such as waste discharges to land (e.g., spoils disposal and storage), erosion from soil disturbance, or discharges to waters of the state (such as groundwater and isolated wetlands), waste discharge requirements (WDRs) are required and are issued exclusively under state law. WDRs typically require many of the same best management practices (BMPs) and pollution control technologies as required by NPDES-derived permits.

California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the federal Antidegradation Policy, the California Anti-Degradation Policy applies to all waters of the state, not just surface waters. The policy requires that, with limited exceptions, whenever the existing quality of a water body is better than the quality established in individual basin plans (see description below), such high quality must be maintained, and discharges to that water body must not unreasonably affect any present or anticipated beneficial use of the water resource.

Water Quality Control Plan for the San Diego Basin

The California legislature has assigned the primary responsibility to administer and enforce statutes for the protection and enhancement of water quality, including the Porter–Cologne Act and portions of the CWA, to the SWRCB and its nine RWQCBs. The San Diego RWQCB implements the Basin Plan (San Diego RWQCB 2021), which designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan (California Water Code, Sections 13240–13247). The Porter–Cologne Act also provides the RWQCBs with authority to include within their basin plan water discharge prohibitions applicable to particular conditions, areas, or types of waste. The Basin Plan is continually updated to include amendments related to implementation of TMDLs, revisions of programs and policies within the San Diego RWQCB Region, and changes to beneficial use designations and associated water quality objectives. The Basin Plan is the guiding document that establishes water quality standards for the region.

The basin plan for each region provides quantitative and narrative criteria for a range of water quality constituents applicable to certain receiving water bodies and groundwater basins within the region. Specific criteria are provided for the larger, designated water bodies within the region, as well as general criteria or guidelines for ocean waters, bays, and estuaries; inland surface waters; and groundwaters. In general, the narrative criteria require that degradation of water quality not occur due to increases in pollutant loads that will adversely impact the designated beneficial uses of a water body.

Construction General Permit

For stormwater discharges associated with construction activity in the State of California, the SWRCB has adopted the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit [CGP]) (Order No. 2022-0057-DWQ) to avoid and minimize water quality impacts attributable to such activities. The CGP applies to all projects in which construction activity disturbs 1 acre or more

of soil. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The CGP requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which would specify water quality BMPs designed to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site. Routine inspection of all BMPs is required under the provisions of the CGP and the SWPPP must be prepared and implemented by qualified individuals as defined by the SWRCB.

To receive coverage under the CGP, a project applicant must submit a Notice of Intent and permit registration documents to the SWRCB. Permit registration documents include a construction site risk assessment to determine appropriate coverage level; detailed site maps showing disturbance area, drainage area, and BMP types/locations; the SWPPP; and, where applicable, post-construction water balance calculations and active treatment systems design documentation.

Phase II Small MS4 Permit

To enable efficient permitting under both the CWA and the Porter–Cologne Act, the SWRCB and the RWQCBs administer permit programs that group similar types of activities with similar threats to water quality. These "general permit" programs include the Phase II Small Municipal Separate Storm Sewer System (MS4) Permit,[2] the CGP, and other general permits for low-threat discharges. The City of Santee is subject to Phase I MS4 Permits (Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100, NPDES No. CAS019266).

The Small MS4 Permit consists of several program elements: Program Management, Public Involvement/ Participation, Illicit Discharge Detection and Elimination, Construction Site Storm Water Runoff Control, Pollution Prevention/Good Housekeeping for Permittee Operations, Post Construction Storm Water Management for New Development and Re-development, Water Quality Monitoring Requirements, Program Effectiveness Assessment, and Annual Reporting. Besides requiring implementation of construction site BMPs and performance criteria and design guidelines for development within the Small MS4's service area, the Small MS4 Permit also requires operators to map their outfalls, properly maintain the storm drain system, educate the public on pollution prevention, and monitor and report on the quality of MS4 discharges to receiving waters so that the effectiveness of the program can be evaluated. Collectively, the program elements are designed to ensure discharges from the storm drain system do not contain pollutant loads at levels that violate water quality standards and Basin Plan objectives and policies (such as a TMDL for a CWA Section 303[d] impaired water body). Implementation of the program elements are the responsibility of the Small MS4 operator, in this case, the City.

Relevant to the proposed Project is that the Small MS4 Permit requires Priority Development Projects, or Regulated Projects[3], to implement post-construction measures in the form of site design, source control, stormwater treatment measures, and baseline hydromodification management measures to reduce the discharge of pollutants in stormwater to the maximum extent practicable. Examples include the following:

- **Source Control Measures:** Source control measures seek to avoid introduction of water quality pollution/degradation. Source control strategies include covering refuse/trash areas, properly managing

[2] A Small MS4 is defined as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that serve populations of less than 100,000 persons.

[3] Regulated Projects are defined in Section E.12.c of Water Quality Order 2013-0001-DWQ, and include all projects that create and/or replace 5,000 square feet or more of impervious surface, not including detached single-family home projects that are not part of a larger plan of development, interior remodels, routine maintenance or repair within the existing footprint, or linear underground/overhead projects.

outdoor storage of equipment/materials, minimizing use of pesticides and fertilizers in landscaping, using sumps or special area drains to send non-stormwater discharges to the sewer, and ensuring regular grounds maintenance.

- **Site Design Measures:** Site design measures require early assessment and evaluation of how site conditions, such as soils, vegetation, and flow paths, will influence the placement of buildings and paved surfaces. The evaluation is used to meet the goals of capturing and treating runoff and maximizing opportunities to mimic natural hydrology. Options for site design measures include preserving trees, buffering natural water features, disconnecting impervious surfaces, and using green roofs or porous pavement.
- **Treatment Control Measures:** Treatment control measures retain, treat, and/or infiltrate the site runoff produced under normal circumstances, controlling both the quality and quantity of stormwater released to the stormwater conveyance system and natural receiving waters. In most situations, this means implementing structural BMPs (e.g., infiltration, bioretention, and/or rainfall harvest and re-use) to address the volume and rate of runoff produced by 85th percentile storm[4] (i.e., design capture volume). The Small MS4 Permit requires Regulated Projects to prioritize stormwater capture (e.g., infiltration and/or harvest and re-use) unless site conditions (e.g., low-permeability soils) make it infeasible.
- **Hydromodification Measures:** Hydromodification measures are required for projects that create or replace 1 or more acres of impervious surfacing so that post-project runoff shall not exceed the estimated pre-project flow rate for the 2-year, 24-hour storm. If the project creates or replaces less than 1 acre of impervious surfaces and demonstrates that post-project flows from the site are less than pre-project flows, then no hydromodification measures from Section E.12.e.(ii)(f) from the Small MS4 Permit are required.
- **Operation and Maintenance Requirements:** The Small MS4 Permit requires that maintenance agreements stay in place with each property to ensure permanent treatment control measures developed on site are properly maintained and/or repaired in accordance with the stormwater quality control plan.

The aforementioned site design, treatment control, and hydromodification measures are often collectively referred to as "Low Impact Development" standards. The proposed Project meets the criteria as a Priority Development Project, or Regulated Project and, thus, is required to comply with the stormwater management requirements of the Small MS4 Permit.

The Small MS4 Permit is administered by the SWRCB, while other general WDRs are administered by the San Diego RWQCB. Point source discharges or other activities that threaten water quality that are not covered under a general permit must seek individual NPDES permits and/or WDRs, depending on the type, location, and destination of the discharge. For these type of discharges, the initial step in the process is to submit a "Report of Waste Discharge" to the San Diego RWQCB, which then determines the appropriate permitting pathway.

Local

City of Santee Clean Water Storm Water Program

Stormwater runoff in the City is regulated in accordance with the City of Santee Guidelines for Surface Water Pollution Prevention (City of Santee 2015). This stormwater guidance manual supports the City's Storm Water Management and Discharge Control Ordinance (Storm Water Ordinance), codified as Santee Municipal Code Chapter 9.06. The manual also supports the water quality protection provisions of Municipal Code Chapters 11.40,

[4] The 85th percentile storm represents a value of rainfall, in inches, such that 85% of the observed 24-hour rainfall totals within the historical record will be less than that value.

Excavation and Grading. Moreover, the manual is not a stand-alone document but must be read with applicable parts of the aforementioned chapters of the Municipal Code (collectively, "Ordinances"). In general, this stormwater manual categorically and explicitly establishes how dischargers must comply with the ordinances and to receive permits for projects and activities that are subject to those ordinances. The stormwater manual and the ordinances have been prepared to provide the City with the respective legal authority and administrative actions necessary to comply with the requirements of the CGP (Order No. 2022-0057-DWQ).

City of Santee General Plan

Land Use Element

Objective 3.0 Provide and maintain the highest level of service possible for all community public services and facilities.

Policy 3.1 The City should ensure that land divisions and developments are approved within the City only when a project's improvements, dedications, fees and other revenues to the City and other agencies fully cover the project's incremental costs to the City and other agencies. These costs are for providing new or upgraded capital improvements and other public facilities and equipment resulting from, and attributable to the project, which are necessary to protect and promote the public's health, safety and welfare and to implement feasible mitigation measures. Such facilities include, but are not limited to: parks, bridges, major roads, traffic signals, street lights, drainage systems, sewers, water, flood control, fire, police, schools, hiking/bicycle trails and other related facilities. In calculating benefits of land divisions and developments, the City may consider other public objectives and goals including social, economic (job creation, secondary economic benefits, etc.) and environmental factors.

Objective 6.0 Ensure that natural and man-induced hazards are adequately address in the location and intensity of the development in the City.

Policy 6.1 The City shall utilize all mapped information, objectives and policies contained in the Safety and Conservation Elements during the development review process.

Policy 6.2 The City should promote the use of innovative site planning to avoid on-site hazards and minimize risk levels.

Conservation Element

Objective 2.0 Protect floodways to reduce flood hazards, protect biological resources and preserve the aesthetic quality along water corridors.

Policy 2.1 The City shall encourage the protection of the San Diego River Corridor and all other City water corridors to reduce flood hazards, protect significant biological resources and scenic values, and to provide for appropriate recreational uses.

Policy 2.6 The City encourages the development of appropriate flood control measures to assure public safety, which also prioritize maintenance of natural habitats and vegetation, and provision of community recreational opportunities as feasible and appropriate.

Policy 2.7 The City shall ensure that all development proposals are located outside of designated floodways and all development in the 100-year floodplain is consistent with the City's Flood Damage Protection Ordinance.

Safety Element

Objective 1.0 Minimize injuries, loss of life and property damage resulting from flood hazards.

Policy 1.1 The City should encourage the use of innovative site design strategies within the floodplain which ensure minimizing of flood hazards, maintaining the natural character of waterways and maximize the use of water as a design feature.

Policy 1.2 All development proposed within a floodplain area shall be required by the City to utilize design and site planning techniques to ensure that structures are elevated at least one foot above the 100-year flood level.

Policy 1.6 The City should require a hydrologic study, including the analysis of effects on downstream and upstream properties and on the flood-carrying characteristics of the stream, for development proposed in the floodplain.

Policy 1.8 Development within the 100-year floodway shall be prohibited, subject to the provisions of the City's Flood Damage Prevention Ordinance.

Community Enhancement Element

Objective 16.0 Utilize the natural design elements presented by the river/creek system within the City.

Policy 16.1 The City should encourage the strengthening of links between the San Diego River, Forester Creek, Woodglen Vista Creek and the Sycamore Creek/Santee Lakes.

Policy 16.2 The City should promote the introduction of water elements (fountains, streams/canals, ponds, etc.) and riparian plant materials (i.e., Sycamores, Oaks, etc.) into developments along watercourses.

Policy 16.3 The City should ensure that all development along the River corridor maximizes orientation towards the River and enhances the natural character of the River.

Policy 16.4 The City shall respect the natural stream processes of the San Diego River and its tributaries and ensure that flood control improvements along existing watercourses/channels avoid concrete channelization whenever possible and retain the natural character of the corridor through planting or preservation of native vegetation.

4.8.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to hydrology and water quality are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hydrology and water quality would occur if the Project would:

A. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
B. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.
C. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    I. result in substantial erosion or siltation on or off-site.
    II. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.
    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.
    IV. impede or redirect flood flows.
D. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
E. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.8.4 Impacts Analysis

A. Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Short-Term Construction Impacts

Less-than-Significant Impact. The proposed Project includes the demolition of all existing on-site structures (see Section 3.2, Environmental Setting) and the construction of a 300,145 square foot industrial/warehousing building. The Project would include 290,145 square feet of warehouse space and 10,000 square feet of office space, as well as associated improvements including loading docks, trailer stalls, passenger vehicle parking spaces, and street, sidewalk, and landscape improvements (Figure 3-7, Conceptual Site Plan). Demolition activities are anticipated to generate approximately 18,381 tons of debris that would be transported to a landfill permitted to accept inert construction and demolition materials. Grading would occur across the 13.43-acre Project site and result in approximately 28,304 cubic yards of cut and 28,304 cubic yards of fill. Underground utilities would be installed to maximum depth of 11 feet below grade.

In the absence of proper soil management, grading and construction could result in wind and water erosion and associated sediment transport into the adjacent San Diego River. Construction-related activities that primarily result in sediment releases are related to exposing previously stabilized soils to potential mobilization by rainfall/runoff and wind. Erosion and sedimentation affects water quality and interferes with photosynthesis; oxygen exchange; and the respiration, growth, and reproduction of aquatic species. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported downstream, which could contribute to degradation of water quality.

Non-sediment-related pollutants that are also of concern during construction relate to construction materials and non-stormwater flows and include construction materials (e.g., paint); chemicals, liquid products, and petroleum products used in construction or the maintenance of heavy equipment; and concrete-related pollutants.

Warehouse construction impacts would be minimized through compliance with the Small MS4 Permit and the SWRCB's CGP. Because the proposed Project is greater than 1 acre in size, the applicant would be required to submit a Notice of Intent to the SWRCB in order to obtain approval to complete construction activities under the CGP. This permit requires the discharger to perform a risk assessment for the proposed development (with differing requirements based upon the determined level) and to prepare and implement a SWPPP. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. The SWPPP is also required to include construction-phase BMPs to be implemented. Typical BMPs that would be implemented during grading and construction of the proposed Project that would minimize degradation of surface water quality include the following:

Erosion Control

- Physical soil stabilization through hydraulic mulch, soil binders, straw mulch, bonded and stabilized fiber matrices, compost blankets, and erosion control blankets.
- Contain and securely protect stockpiled materials from wind and rain at all times, unless actively being used.
- Soil roughening of graded areas to slow runoff, enhance infiltration, and reduce erosion.
- Vegetative stabilization through temporary seeding and mulching to establish interim vegetation.
- Wind erosion (dust) control through the application of water or other dust palliatives as necessary to prevent and alleviate dust nuisance.

Sediment Control

- Perimeter protection to prevent sediment discharges (e.g., silt fences, fiber rolls, gravel bag berms, sand bag barriers, and compost socks).
- Storm drain inlet protection.
- Sediment capture and drainage control through sediment traps and sediment basins.
- Velocity reduction through check dams, sediment basins, and outlet protection/velocity dissipation devices.
- Reduction in off-site sediment tracking through stabilized construction entrance/exit, construction road stabilization, and/or entrance/exit tire wash.
- Slope interruption at prescribed intervals (e.g., fiber rolls, gravel bag berms, sand bag berms, compost socks, biofilter bags).

Waste and Materials Management

- Management of the following types of materials, products, and wastes: solid, liquid, sanitary, concrete, hazardous, and equipment-related wastes. Management measures include covered storage and secondary containment for material storage areas, secondary containment for portable toilets, covered dumpsters, dedicated and lined concrete washout/waste areas, proper application of chemicals, and proper disposal of all wastes.
- A spill response and prevention program will be incorporated as part of the SWPPP and spill response materials will be available and conspicuously located at all times on site.

Non-Stormwater Management

- BMPs or good housekeeping practices to reduce or limit pollutants at their source before they are exposed to stormwater, including such measures as water conservation practices, vehicle and equipment cleaning and fueling practices, illicit connection/discharge elimination, and concrete curing and finishing. All such measures will be recorded and maintained as part of the Project SWPPP.

Training and Education

- Inclusion of CGP-defined Qualified SWPPP Developers and Qualified SWPPP Practitioners. These staff shall have required certifications and shall attend SWRCB sponsored training.
- Training of individuals responsible for SWPPP implementation and permit compliance, including contractors and subcontractors.
- Signage (bilingual, if appropriate) to address SWPPP-related issues (such as site cleanup policies, BMP protection, and washout locations).

Inspections, Maintenance, Monitoring, and Sampling

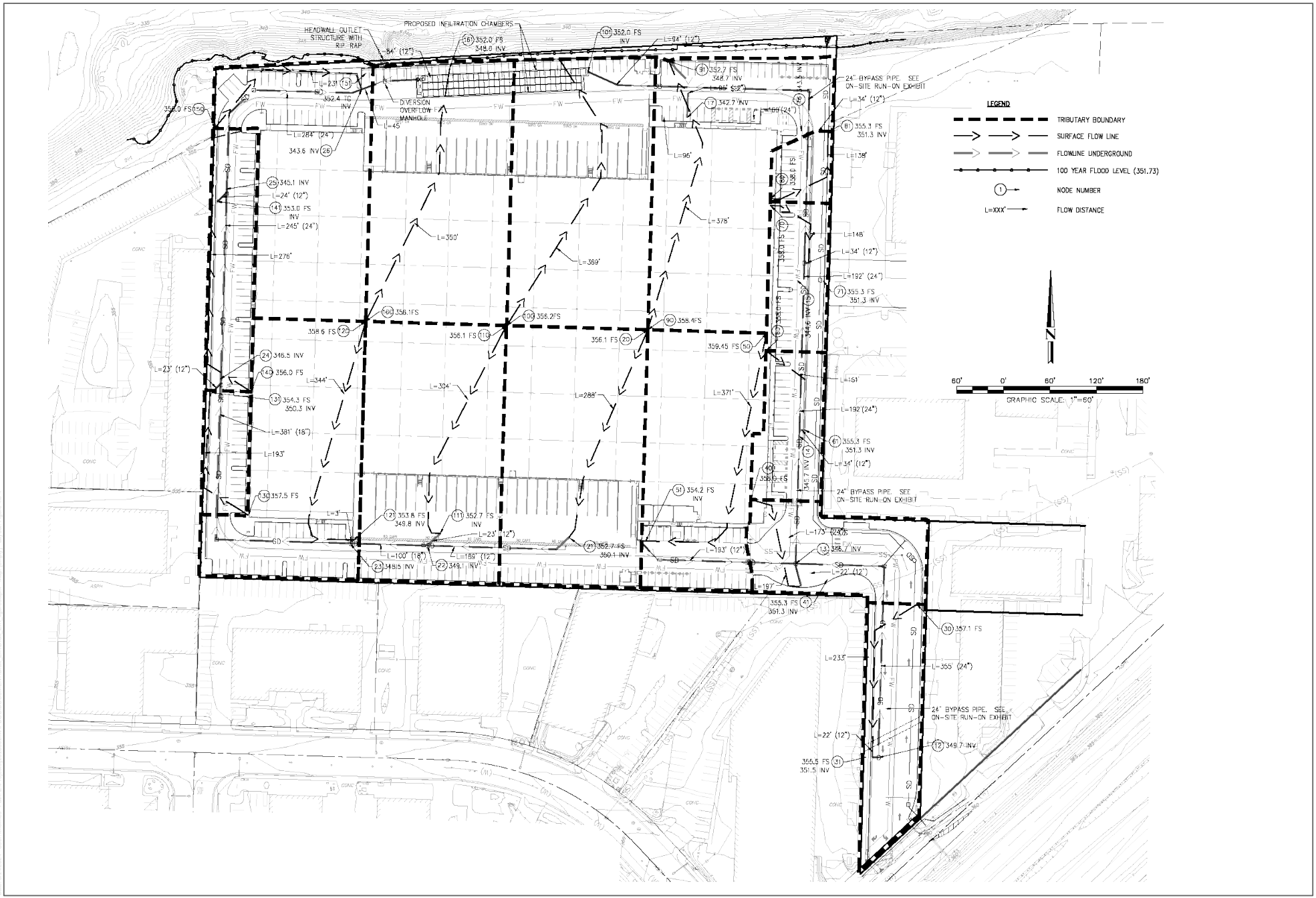
- Performing routine site inspections and inspections before, during (for storm events > 0.5 inches), and after storm events.
- Where applicable, preparing and implementing Rain Event Action Plans prior to any storm event with 50% probability of producing 0.5 inches of rainfall, including performing required preparatory procedures and site inspections.
- Implementing maintenance and repairs of BMPs as indicated by routine, storm-event, and Rain Event Action Plan inspections.
- Implementation of the Construction Site Monitoring Plan for non-visible pollutants if a leak or spill is detected.
- Where applicable, sampling of discharge points for turbidity and pH at minimum three times per qualifying storm event and recording and retention of results.

Through implementation of the requirements outlined in the CGP, construction-related impacts to surface water and groundwater quality would be minimized and impacts would be **less than significant**.

Long-Term Operational Impacts

Less-than-Significant Impact. Once operational, impervious surfaces such as the entrance driveway, parking areas, drive aisles, truck loading areas, walkways, trash enclosures, and the warehouse building would be a source of pollution from incidental spills of vehicle oils and other chemicals that can be conveyed by stormwater and landscape irrigation flows. The impervious surfaces would prevent polluted surface waters from absorbing into the ground surface, but in the absence of proper pollution control, would potentially flow into the adjacent San Diego River.

The on-site watersheds following grading are depicted on Figure 4.8-4, Proposed Hydrology Map (included in Appendix J-1). During storm events, pollutants from paved areas lacking in proper stormwater controls and BMPs could enter the San Diego River. The majority of pollutants entering the river in this manner would be dust, litter, and possibly residual petroleum products (e.g., motor oil, gasoline, diesel fuel). Certain metals, along with nutrients, organic compounds, bacteria/viruses, and pesticides from landscape areas could also be present in stormwater runoff during Project operations (Appendix J-2). Between periods of rainfall, surface pollutants tend to accumulate, and runoff from the first significant storm of the year (“first flush”) would likely have the largest concentration of pollutants.



SOURCE: DRC Engineering 2024

FIGURE 4.8-4

Proposed Hydrology Map

Palisade Santee Commerce Center Project

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Hydromodification management requirements do not apply to the proposed Project, as the Project would discharge stormwater directly into the San Diego River Watershed Management Area, which is defined as an exempt river reach per the "Receiving Waters and Conveyance Systems Exempt from Hydromodification Management Requirements" map. However, the proposed Project meets the criteria as a Priority Development Project, or Regulated Project, as the Project would result in the disturbance of 1 or more acres of land and would therefore be expected to generate pollutants post-construction. As a result, the Project is required to comply with the stormwater management requirements of the City of Santee BMP Design Manual (City of Santee 2016).

In addition, design, construction, and operation of projects in the City of Santee are subject to the Small MS4 Permit and the City of Santee Guidelines for Surface Water Pollution Prevention Manual. The City stormwater guidance manual, which supports the City's Storm Water Ordinance, categorically and explicitly establishes how dischargers must comply with the ordinances and to receive permits for projects and activities that are subject to those ordinances. An objective of this stormwater manual is to reduce the discharge of pollutants from the stormwater conveyance system, to the maximum extent practicable, in order to achieve applicable water quality objectives for surface waters in San Diego County. Minimum post-construction BMP requirements are provided in the manual for industrial, commercial, and municipal projects, including eliminate illicit non-stormwater discharges; properly dispose of process and wash water; eliminate the discharge of vehicle and equipment wash water; eliminate irrigation runoff; eliminate air conditioning condensation discharges; direct runoff from pavement, rooftops, and other impervious surfaces to landscaped areas; and regularly clean and maintain structural BMPs, including Low Impact Development (LID) installations, to ensure proper performance (City of Santee 2015).

In compliance with the City of Santee BMP Design Manual and the City of Santee Guidelines for Surface Water Pollution Prevention manual, the proposed Project would include development of an on-site storm drain system that would accept flows from drain inlets at low spots throughout the site. Stormwater would continue to flow to the north of the site, around the building to an underground infiltration system located within the northern truck yard (Figure 4.8-4). The infiltration system has been sized to infiltrate the design capture volume, based on San Diego County LID requirements, with larger flows building up within the system and discharging to a headwall structure with downstream rip-rap (to dissipate energy and provide scour protection) located near the northern property line, and then draining into the San Diego River (Appendix J-1). The infiltration system would be designed to capture and treat stormwater pollutants, consistent with commercial/industrial developments and associated parking lots, and including oil, grease, metals, trash, and debris. As a result, operations-related water quality impacts would be **less than significant.**

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?

Groundwater Recharge

No Impact. The Project site is currently paved and impervious to groundwater recharge. With the exception of relatively small areas of landscaping, the proposed Project would similarly result in impervious surfaces across the site. As a result, the potential for groundwater recharge would not change with respect to existing conditions and **no impacts** would occur.

Groundwater Supply

Less-than-Significant Impact. Domestic water service is provided to the Project area by the PDMWD, which primarily relies on imported surface water from the San Diego County Water Authority. The PDMWD's water supplies

also include recycled water and a very small amount of groundwater from one well in the Santee Basin, which supplements the recycled water system. The well is unreliable; therefore, groundwater supplies from the well are assumed to not be available as a future supply and the PDMWD has no plans for other groundwater supplies in the future. In 2022, groundwater comprised 6% of the water supplies from the San Diego County Water Authority, and by 2045, groundwater is expected to comprise 4% of their water supply. Based on the minor amount of groundwater used by PDMWD as a water source, the water demand for the proposed Project would not substantially decrease groundwater supplies in the Santee Basin, such that the Project may impede sustainable groundwater management of the Santee Basin. Impacts would be **less than significant.**

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;

Less-than-Significant Impact. As previously discussed, the Project site is currently paved and the amount of impervious surfaces would remain unchanged following grading and construction. The site would generally match the existing drainage conditions, as stormwater from the existing culvert and Woodside Avenue to the south would be accepted by the on-site storm drain and flow through the site. All flows would be routed to an underground infiltration chamber that is sized based on County of San Diego LID requirements. The infiltration chamber would have a system volume of approximately 26,891 cubic feet and consist of a total area of approximately 6,233 square feet. The infiltration chambers would pond to an elevation of 348.50 feet before stormwater would outlet to an overflow system. Six-inch outlet pipes would be connected 8 inches above the invert of the chambers. High flows would bypass the infiltration system and would overflow into a headwall structure with downstream rip-rap, located along the northern perimeter of the site along the banks of the San Diego River (Figure 4.8-4). The headwall and rip-rap design would dissipate runoff energy and provide scour protection. This system would replace the outlet currently accepting water from the site that has been eroded from a concentrated amount of stormwater in the past (Appendix J-1). Peak runoff rates were calculated for the 10-year, 50-year, and 100-year storm events, including on-site runoff and off-site run-on. Based on these calculations, post-construction runoff rates would be less than under existing conditions for each storm event (Appendix J-1). As a result, the potential for off-site erosion and siltation of the San Diego River would be decreased in comparison to existing conditions.

An additional 24-inch pipe would accept flows from the existing 24-inch culvert located under Interstate 67 outlets, at the entrance to the site off of Woodside Avenue. The proposed storm drain has been designed to route stormwater to the north underneath the Project site and outlet via a flared end section to prevent stormwater intrusion from larger storms within the San Diego River (Appendix J-1).

Because 1) the amount of impervious surfaces would not increase as a result of the project, 2) off-site stormwater runoff rates would decrease as a result of installation of the proposed drainage system and infiltration system, and 3) existing concentrated runoff and associated erosion would be eliminated along the northern project boundary, beneficial **less than significant impacts** would occur as a result of Project completion.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;

Less-than-Significant Impact. As previously discussed, stormwater runoff rates would decrease as a result of the Project. As a result, the Project would not result in flooding on- or off-site. Beneficial **less than significant impacts** would occur as a result of Project completion.

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

Less-than-Significant Impact. As previously discussed, stormwater runoff rates would decrease as a result of the Project. As a result, the Project would not create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems. Beneficial impacts would occur as a result of the proposed drainage system.

As previously discussed, during storm events, pollutants from paved areas lacking in proper stormwater controls and BMPs could enter the San Diego River. The majority of pollutants entering the river in this manner would be dust, litter, and possibly residual petroleum products (e.g., motor oil, gasoline, diesel fuel). Certain metals, along with nutrients, organic compounds, bacteria/viruses, and pesticides from landscape areas could also be present in stormwater runoff during Project operations. However, the proposed infiltration system would be designed to capture and treat stormwater pollutants, consistent with commercial/industrial developments and associated parking lots, and including oil, grease, metals, trash, and debris. As a result, operations-related water quality impacts would be **less than significant**.

iv) impede or redirect flood flows?

Less-than-Significant Impact. As illustrated in Figure 4.8-3, Flood Map, the northern boundary of the Project site is adjacent to a regulatory floodway (FEMA 2023). The Project site has been designed to match the existing contours along the San Diego River as to not impact the existing floodplain, and the Project building will be more than one foot above the floodplain in accordance with City of Santee Flood Damage Prevention Ordinance, Chapter 11.36. The Project will not impact the FEMA floodplain.

DRC Engineering (Appendix J-1) used the City of Santee Citywide Drainage Study (BSI Consultants 1990) as the basis for reviewing 100-Year flood levels within the San Diego River relative to the Project site. While the City developed a Master Drainage Study Update in 2023, the 1990 study was used for the Project technical report because it is more relevant pertaining to the 100-year flood levels of the San Diego River. Based on this analysis, 100-year flood elevations at the Project site would be 351.73 feet, which would be more than 6 feet below proposed finished floor elevations of the proposed warehouse building (Figure 4.8-4). The Project site has been designed to match the existing contours along the San Diego River as not to impact the existing floodplain and the proposed building would be constructed greater than one foot above the floodplain, per City of Santee requirements. The Project would not require coordination with FEMA and/or preparation of FEMA no-rise certification, which is a formal engineering analysis process completed in conjunction with FEMA (Appendix J-3). As a result, the Project would not substantially alter the drainage patterns of the site, such that the Project would impede or redirect flood flows. Impacts would be **less than significant**.

D. Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less-than-Significant Impact. The proposed Project is not in a tsunami or seiche zone. With respect to flood hazard, as described above, the finished floor elevations of the proposed warehouse building would be more than 6 feet above calculated 100-year flood levels. In addition, the top of the water quality filtration chambers would be at an elevation of 349.0, with the 6-inch perforated pipe outlet being at an elevation of 352.0, which is slightly above anticipated flood levels (Appendix J-1). As a result, the stormwater filtration system would continue to be operable during a flood event. Because the Project would be constructed above the 100-year flood elevation, the Project would not risk release of pollutants due to project inundation. Impacts would be **less than significant**.

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

No Impact. The proposed Project would be required to prepare a SWPPP, in accordance with the CGP, which will include a risk determination and list the appropriate water quality BMPs that will be used to protect stormwater quality throughout the construction phase. Additionally, the SWPPP must contain a visual monitoring program and a chemical monitoring program for "non-visible" pollutants to monitor the effectiveness of the selected BMPs. The SWPPP will be required to demonstrate that the construction activities will not violate discharge prohibitions, effluent limitations, and water quality standards as outlined in the CGP. As such, with implementation of the SWPPP, construction of the proposed Project would not conflict with or obstruct implementation of the Basin Plan.

The proposed Project overlies the San Diego River Valley Groundwater Basin. Currently no significant withdrawals are conducted from this basin. Water required for soil compaction and dust control during construction would be provided by the PDMWD, which primarily relies on imported surface water from the San Diego County Water Authority. As a result, groundwater would likely not be used as a water source during construction and operations. Therefore, the proposed Project would not conflict with or obstruct implementation of the Basin Plan. **No impacts** would occur.

4.8.5 Mitigation Measures and Level of Significance After Mitigation

All impacts related to hydrology and water quality would be less than significant. No mitigation is required.

4.9 Land Use and Planning

This section describes the existing land use and planning conditions of the Palisade Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to implementation of the Project. Information contained in this section is based on review of local, regional, and statewide policies and regulations encompassing the Project site, including:

- San Diego Association of Governments (SANDAG) Regional Plan/Sustainable Communities Plan (RP/SCS)
- City of Santee General Plan
- City of Santee Municipal Code

Other sources consulted are listed in Section 4.9.6, References Cited.

4.9.1 Existing Conditions

City-Wide Conditions

The City of Santee, California is located in the East County region of San Diego County, located between the Pacific Ocean and the Cleveland National Forest. The City of Santee encompasses about 17 square miles (approximately 10,615 acres) in eastern San Diego County. It is located approximately 18 miles east of downtown San Diego. The City is bordered on the east primarily by residential development in the unincorporated San Diego County communities of Lakeside and Eucalyptus Hills and to the northeast by vacant land and active mining operations in Slaughterhouse Canyon. To the south, Santee is bordered by the City of El Cajon, unincorporated areas of the County of San Diego and the Gillespie Field Airport and to the southwest by Mission Trails Regional Park property located in the City of San Diego (City of Santee 2003).

The City comprises a mix of different land use types and density. Single-family residential uses comprise the largest land use totaling approximately 2,418 acres (City of Santee 2003). The other residential use types occurring throughout the City include multifamily residential (apartments and condominiums), and mobile home parks, which are primarily located near the City's highly traveled roads including Mission Gorge Road, Magnolia Avenue and Prospect Avenue. The 650-acre Town Center district forms a downtown core comprised of business parks, high-density residential and retail businesses that feed off the synergy of Santee Trolley Square shopping complex and the Metropolitan Transit System trolley station (City of Santee 2023). Industrial uses in the City are concentrated in the south-central part of the City along Prospect Avenue, Magnolia Avenue and Cuyamaca Street, and north of Woodside Avenue along the San Diego River corridor, within the vicinity of the Project site (City of Santee 2003).

Existing Project Site Conditions

The approximately 13.5-acre Project site is developed with a closed drive-in theatre that includes two movie screens, two ticket booths, and a building containing restrooms and a snack bar that are no longer in service. An Entrance Sign is located on the west side of the Project's driveway entrance. Of metal and wood construction, the sign has neon tubing outlining a star and the word "Santee" at the top of the sign. The Project site boundary extends beyond the paved drive-in into the undeveloped area south of the San Diego River. The drive-in theatre has closed, but the site continues to be used for a swap meet.

The Project site extends beyond the paved drive-in and includes a vacant strip of land bordering the San Diego River, north of the developed area of the Project site. There are no native vegetation communities within the Project boundary. Vegetation land coverages include Developed and Ornamental. There are no aquatic resources within the Project site boundary. The northern edge of the Project site boundary is next to stands of thick vegetation occurring along a chain link fence line. This vegetation is dominated by African sumac (*Searsia lancea*), a non-native low-growing tree species which is known to occupy disturbed areas.

Surrounding Land Uses

The Project site surrounding land uses consist of a mix of industrial, manufacturing, automotive, commercial, open space and residential uses (refer to Figure 3-3, Project Aerial and Existing Uses, within Chapter 3 of this Draft EIR). Specific land uses located in the immediate vicinity of the Project site include the following:

- **North:** San Diego River, with residential uses beyond
- **East:** Industrial and manufacturing uses, and Mission Park Court
- **South:** Manufacturing and commercial uses, North Woodside Avenue, and SR-67
- **West:** Industrial and manufacturing uses, and Wheatlands Court

4.9.2 Relevant Plans, Policies, and Ordinances

Federal

There are no federal plans, policies, or ordinances applicable to the land use considerations of the Project.

State

California Planning and Zoning Law

The legal framework under which California cities and counties exercise local planning and land use functions is set forth in California Planning and Zoning Law, Government Code Sections 65000-66499.58. Under State planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals.

Regional

2021 Regional Plan/Sustainable Communities Strategy

San Diego Association of Governments (SANDAG) is the designated Metropolitan Planning Organization (MPO) for 18 city councils and County Board of Supervisors, and is federally mandated to develop plans for transportation, growth and development management, hazardous waste management, and air quality. The City of Santee is one of the many jurisdictions that fall under SANDAG.

The 2021 Regional Plan/Sustainable Communities Strategy (RP/SCS) (2025 Regional Plan is currently being drafted) was adopted on December 21, 2021, and presents the land use and transportation vision for the region through the year 2050, providing a long-term investment framework for addressing the region's challenges (SANDAG 2021). The RP/SCS explicitly lays out goals related to housing, transportation, equity and resilience in order to adequately reflect the increasing importance of these topics in the region, and where possible the goals have been developed to link to potential performance measures and targets. The RP/SCS development process involved working closely with local governments throughout the region to collect and compile data on land use and growth trends. The core vision of the RP/SCS is to build upon and expanded land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

SDAPCD - 2013 Air Quality Monitoring Quality Management Plan

An Air Quality Monitoring Quality Management Plan (AQMP) is a plan for the regional improvement of air quality. The San Diego County 2013 AQMP is the applicable AQMP for the San Diego Air Pollution Control District (SDAPCD) and was approved by the SDAPCD Governing Board in December 2013 (SDAPCD 2013). The Project's consistency with the 2013 AQMP was analyzed in detail in Section 4.2, Air Quality.

San Diego County Regional Transportation Congestion Improvement Program

The *San Diego County Regional Transportation Congestion Improvement Plan* (RTCIP)*/Regional Arterial System (RAS)* was prepared by the San Diego Associated Governments (SANDAG) to more directly link land use, transportation, and air quality planning and to prompt reasonable growth management programs that would more effectively utilize new and existing transportation funds to alleviate traffic congestion and related impacts and improve air quality (SANDAG 2023). The *San Diego County RTCIP* was first adopted in May 2004 and has since been updated 12 times, with the most recent comprehensive update in September 2022. The Project's consistency with the *San Diego County RTCIP* is discussed in detail in Section 4.12, *Transportation*.

Local

City of Santee General Plan

The City of Santee General Plan establishes the long-term vision for the City and fulfills the requirements of California Government Code Section 65302 requiring local preparation and adoption of General Plans. The General Plan includes the following mandated and optional elements: Land Use Element, Housing Element, Mobility Element, Recreation Element, Trails Element, Conservation Element, Noise Element, Safety Element, and Community Enhancement Element

City of Santee Zoning Ordinances

The Zoning Ordinance, Title 13 of the Santee Municipal Code, includes regulations concerning where and under what conditions various land uses may occur in the City. It also establishes zone-specific height limits, setback requirements, parking ratios, and other development standards, for residential, commercial, industrial, and all other types of sites. The Zoning Ordinance is a primary tool for implementing the City's General Plan. The purpose of the Zoning Ordinances is to encourage, classify, designate, regulate, and restrict the highest and best locations and uses of buildings and structures, for residential, commercial, and industrial or other purposes.

4.9.3 Thresholds of Significance

The following significance criteria, included for analysis in this EIR, is based on Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.), and will be used to determine the significance of potential land use and planning impacts. Impacts to land use and planning would be significant if the Project would:

A. Physically divide an established community.
B. Conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.9.4 Impacts Analysis

A. Would the Project divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a linear feature (e.g., a major highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying area.

Under the existing condition, the Project site consists of approximately 13.43 acres of developed land with a two-screen drive-in theatre and a building containing restrooms and a snack bar. The Project site boundary extends beyond the paved drive-in into the undeveloped area south of the San Diego River, however it is not used as a connection between established communities. Instead, connectivity within the area surrounding the Project site is facilitated via local roadways. As such, the Project would not impede movement within the Project area, within an established community, or from one established community to another. Therefore, **no impacts** would occur.

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?

Less-than-Significant Impact. To evaluate the proposed Project's impacts related to land use and planning, this analysis examines the Project's consistency with both regional and local plans, policies, and regulations that regulate uses on the Project site. These plans are as follows:

- City of Santee General Plan and Zoning Code
- SANDAG 2021 RP/SCS
- SDCAPCD
- San Diego County RTCIP/RAS

As detailed below, the Project would result in a **less-than-significant** environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

City of Santee General Plan and Zoning Code

The City's General Plan designates the Project site for Light Industrial uses and the site is zoned for Light Industrial, per the City's Zoning Code. The proposed Project would be consistent with Chapter 13.14 of the City's Municipal Code, which states that allowed industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and business parks, including corporate offices. This zoning is consistent with the

Light Industrial land use designation of the General Plan (City of Santee 2003). Although the allowable building height in this zone is 40 feet, with the approval of the proposed Conditional Use Permit (CUP), the proposed warehouse building's height of 50 feet would be allowable. Therefore, the Project would be consistent with the City's General Plan and Zoning Code and impacts would be **less than significant**.

Table 4.9-1 outlines the applicable goals, objectives, and policies identified in the City's General Plan and the Project's consistency with each of these policies. In some cases, mitigation measures identified within this Draft EIR for the purposes of reducing impacts to other Appendix G CEQA environmental resource areas (i.e., air quality and noise) would assist the Project in maintaining consistency with applicable goals, objectives, and policies adopted for the purpose of avoiding or mitigating environmental effects. As shown below, with implementation of mitigation, the Project would be consistent with the applicable goals and policies of the General Plan.

Table 4.9-1. Consistency with City of Santee General Plan Goals, Objectives, and Policies

Goals	Response
Land Use	
Goal. Promote development of a well-balanced and functional mix of residential, commercial, industrial, open space, recreation, and civic uses that will create and maintain a high-quality environment	**Consistent.** The Project involves the development of a warehouse/industrial use along the N Woodside Avenue corridor, which is an established industrial corridor within the City. The Project's site plan, architecture, and landscaping have been designed to create a contemporary, unified, and high-quality business park environment that would be compatible with other industrial uses within the industrial corridor.
Objective 5.0. Develop industrial uses which are compatible with adjacent land uses.	**Consistent.** The Project would involve the construction of an industrial warehouse, which would be consistent with the adjacent industrial land uses as well as existing zoning and the land use designation for the site.
Policy 5.2. The City should promote consolidation of industrial uses into comprehensively planned industrial parks.	**Consistent.** As discussed above, the Project would involve the construction of an industrial warehouse, which would be consistent with the General Plan's land use designation and zoning for the site and would be compatible with adjacent industrial uses.
Policy 5.3. The City shall ensure that industrial development creates no significant off-site impacts related to access and circulation, noise, dust, odors, visual features and hazardous materials, that cannot be adequately mitigated.	**Consistent.** As part of the Project's review process, City staff have considered development of this industrial Project in accordance with the General Plan and the City's Municipal Code. The Project's off-site effects with respect to access and circulation, noise, dust and odors (air quality), visual features and hazardous materials have been addressed in this EIR. As discussed, the Project would have a less than significant impact regarding these aspects.
Policy 5.4. The City shall promote a mix of industrial uses that provide the City with a sound, diverse industrial base.	**Consistent.** The Project involves the development of an industrial warehouse to support warehousing and distribution, manufacturing, assembly, and/or research and development operations, and related office uses, thereby providing a diverse industrial base and enhancing the general character of the City.

Table 4.9-1. Consistency with City of Santee General Plan Goals, Objectives, and Policies

Goals	Response
Policy 5.5. The City should ensure that industrial developments provide for business service needs and the needs of employees.	**Consistent.** The Project would involve the development of a high-quality industrial warehouse that would employ approximately 185 persons, thereby providing community stability and enhancing the needs of the City.
Objective 6.0. Ensure that natural and man-induced hazards are adequately addressed in the location and intensity of development in the City.	**Consistent.** As discussed in Chapter 5, Effects Found Not To Be Significant, Section 5.2 Geology and Soils, natural and man-induced hazards impacts would be less than significant. According to Figure 8-3 of the City's General Plan Safety Element, the Project site is located in area C3, which identifies liquefaction potential as low to moderate (City of Santee 2003). Therefore, impacts associated with potential seismic-related ground failure, including liquefaction would be less than significant. In addition, the Project would implement the City's design and construction standards that address safety in hazardous conditions.
Policy 6.1. The City shall utilize all mapped information, objectives and policies contained in the Safety and Conservation Elements during the development review process.	**Consistent.** The Project would implement all objectives and policies discussed in the Safety and Conservation Elements applicable to the Project. As discussed in Section 4.7, Hazards and Hazardous Materials, the Project would comply with all federal, state, and local standards related to safety and conservation of the public and environment.
Policy 6.2. The City should promote the use of innovative site planning to avoid on-site hazards and minimize risk levels.	**Consistent.** As discussed above, the Project would comply with all federal, state, and local standards related to safety and conservation of the public and environment. As discussed in Section 4.7 Hazards and Hazardous Materials, the Project is regulated by Division 20, Chapter 6.95, of the California Health and Safety Code, therefore, the Project would ensure hazardous materials are handled, stored, transported, and disposed of correctly.
Objective 11.0. Ensure that development in the City is consistent with the overall community character and contributes positively towards the City's image.	**Consistent.** The Project would be consistent with the City's General Plan, and zoning designations. As discussed in Section 3, Project Description, the Project's architecture, landscaping, and lighting improvements are all designed to create a contemporary, unified, and high-quality business park environment contributing a positive image to the City's image.

Table 4.9-1. Consistency with City of Santee General Plan Goals, Objectives, and Policies

Goals	Response
Policy 11.1. The City shall ensure that all requirements set forth within the Community Enhancement Element are implemented during the development review process.	**Consistent.** As discussed above, the Project would be consistent with the City's General Plan, including the Enhancement Element requirements. The Project would create jobs for the residents of the City and surrounding cities, improving the quality of life. In addition, the Project would be designed by following the City's municipal codes, and design regulations as discussed in Section 3, Project Description.
Objective 12.0. Maintain the Integrity and Consistency of the General Plan.	**Consistent.** The Project would be consistent with the City's General Plan as well as maintain its integrity. The Project would adhere to land use designations, align with zoning regulations, and ensure public engagement during the development process.
Community Enhancement	
Objective 8.0. Improve the appearance and function of existing and planned industrial areas.	**Consistent.** Under existing conditions, the theater (a General Commercial land use) conflicts with the Industrial zoning designation for the Project site. The proposed Project would resolve this conflict and provide for a use that would be consistent with the Light Industrial General Plan designation. The Project would incorporate design principles and concepts contained in the Community Enhancement Element to create a contemporary, unified, and high-quality warehouse/industrial park environment.
Policy 8.3. The City shall ensure through the Development Review process that standards established for the industrial areas are maintained.	**Consistent.** The Project is subject to a Development Review permit to ensure industrial standards for the site are established and maintained. Under existing conditions, the theater (a General Commercial land use) conflicts with the Industrial zoning designation for the Project site. The proposed Project would resolve this conflict and provide for a use that would be consistent with the overall area. The Project would incorporate design principles and concepts contained in the Community Enhancement Element to create a contemporary, unified, and high-quality warehouse/industrial park environment.
Policy 8.4. The City shall ensure that all industrial development is attractive and of high quality design to enhance the image of the City.	**Consistent.** Under existing conditions, the theater (a General Commercial land use) conflicts with the Industrial zoning designation for the Project site. The proposed Project would resolve these conflicts and provide for a use that would be consistent with the overall area. The Project would incorporate design principles and concepts contained in the Community Design Element to create a contemporary, unified, and high-quality warehouse/industrial park environment. For example, the proposed landscaping materials include a mixture of trees, shrubs, and groundcover that would be located along the Project frontages to incorporate a layering concept and

Table 4.9-1. Consistency with City of Santee General Plan Goals, Objectives, and Policies

Goals	Response
	provide different height trees and border or accent shrubs and low ground covers.
Policy 9.2. The City shall promote a Citywide street tree and median planting program which enhances views and is scaled in relationship to the function of the roadway.	**Consistent.** The Project includes a landscape plan which would involve the installation of landscaping and trees along N. Woodside Avenue. The landscaping materials along the Project frontages incorporate a layering concept to provide different height trees and border or accent shrubs and low ground covers.
Policy 9.3. The City shall ensure adequate landscaped buffers are provided between trafficways and sidewalks.	**Consistent.** The Project includes a landscape plan which would involve the installation of landscaping and trees along N. Woodside Avenue. The landscaping materials along the Project frontages incorporate a layering concept to provide different height trees and border or accent shrubs and low ground covers.
Noise	
Goal. Improve the city's overall quality of life by reducing harmful and annoying noise for existing and future residents.	**Consistent.** As discussed in Section 4.10, Noise, the Project would result in less than significant impacts to noise and groundborne vibration. Therefore, the Project is consistent with this goal.
Objective 1.0. Control noise from sources adjacent to residential, institutional and other noise-sensitive receptors.	**Consistent.** As discussed in Section 4.10, Noise, the nearest sensitive receptor to the site boundary is 310 feet from the Project site. The highest estimated construction noise levels are predicted to stay below 67 dBA L_{eq} over an 8-hour period at the nearest existing residences (located south of North Woodside Avenue and as close as 310 feet from the Project driveway) when grading activities take place near the Project driveway. Additional noise measurements were conducted at residences further afield, such as those to the north of the project site, and modeling indicated that noise at these residences would stay below 67 dBA L_{eq} over an 8-hour period. Additionally, the nearest existing residences to the south are dominated by traffic noise from SR-67, and intervening barriers and terrain were not considered in the model. As a result, short-term construction noise is predicted to be well below the FTA guidance of 80 dBA L_{eq} over an 8-hour period, and therefore is less than significant.
Policy 1.1. The City shall support a coordinated program to protect and improve the acoustical environment of the City including development review for new public and private development and code compliance for existing development.	**Consistent.** The Project is subject to a Development Review Permit to ensure code compliance. As part of this Project, a Noise Technical Report was prepared (included as Appendix K). Noise impacts are analyzed within Section 4.10, Noise. Therefore, the Project is consistent with this policy.
Policy 1.2. The City shall utilize noise studies and noise contour maps when evaluating development proposals during the discretionary review process.	**Consistent.** As part of this Project, a Noise Technical Report was prepared (included as Appendix K). Noise

Table 4.9-1. Consistency with City of Santee General Plan Goals, Objectives, and Policies

Goals	Response
	impacts are analyzed in Section 4.10, Noise. Therefore, the Project is consistent with this policy.
Policy 1.6. The City shall continue to monitor noise throughout Santee and enforce the standards and regulations of the City's Noise Ordinance.	**Consistent.** As discussed in Section 4.10, Noise, the Project would comply with the City of Santee Noise Ordinance. Therefore, the Project is consistent with this policy.
Policy 1.16. The City shall ensure that appropriate regulations and standards are incorporated into the City's development policies and ordinances, including the use of noise evaluations in Environmental Impact Reports and statements, which take all aspects of noise into consideration.	**Consistent.** As discussed in Section 4.10, Noise, the Project prepared a Noise Technical Report (included as Appendix K), which analyzed construction and operation noise, as well as groundborne vibration. All impacts were determined to be less than significant. Therefore, the Project is consistent with this policy.
Objective 2.0. Ensure that future developments will be constructed to minimize interior and exterior noise levels.	As discussed in Section 4.10, Noise, the Project prepared a Noise Technical Report (included as Appendix K), which analyzed construction and operation noise, as well as groundborne vibration. All impacts were determined to be less than significant. Therefore, the Project is consistent with this policy.
Policy 2.2. The City should require new development to mitigate noise impacts to existing uses resulting from new development when: 1) such development adds traffic to existing City streets that necessitates the widening of the street; and 2) the additional traffic generated by the new development causes the noise standard or significance thresholds to be exceeded.	**Consistent.** Within the Noise Technical Report (included as Appendix K of this Draft EIR), predicted traffic noise levels are included within Table 7. Utilizing the traffic noise modeling worksheets, Table 7 shows that the highest predicted change in traffic noise level (the project driveway) combined with the roadways surrounding the immediate project site are predicted to experience an aggregate total traffic noise level of 84 dBA at 50 feet for the horizon year 2035 condition with a predicted increase of less than 1 dBA due to the project contribution. Additionally, although the increase in noise level for the project driveway is greater than 5 dBA and therefore higher than the FICON thresholds and perceptible to the average person, there are no noise-sensitive receptors adjacent to the project driveway; the nearest noise-sensitive receptors to the south of the project are already dominated by much higher levels of traffic noise from nearby adjacent roadways such as SR-67, while noise-sensitive receptors to the north of the project are occluded from the project driveway by intervening buildings and terrain. Therefore, potential impacts at existing off-site noise-sensitive land uses along roadway segments identified in Table 7 and with respect to project-generated changes to future traffic noise would be less than significant. Therefore, the Project is consistent with this policy.
Policy 2.3. The City should not require new development to mitigate noise impacts to existing uses when the new development only adds traffic already anticipated by the City's General Plan to an	**Consistent.** As discussed in Section 4.10, Noise, all impacts would be less than significant. Therefore, no mitigation is required.

Table 4.9-1. Consistency with City of Santee General Plan Goals, Objectives, and Policies

Goals	Response
existing street, but does not necessitate widening of that street.	
Safety	
Goal. The goal of the Safety Element is to minimize injuries, loss of life, and property damages resulting from natural and human-induced safety hazards.	**Consistent.** As discussed in Chapter 3, Project Description, and Chapter 5, Effects Found Not To Be Significant, the Project would be designed consistent with applicable regulatory requirements that would address potential impacts associated with flooding, fire, seismic hazards, criminal activities, and hazardous materials.
Objective 1.0. Minimize injuries, loss of life and property damage resulting from flood hazards.	**Consistent.** As discussed above, compliance with the California Building Code and incorporation of the recommendations of the Geotechnical Investigation would ensure the structural integrity of the Project. Further, as part of the Project design process, a site-specific hydrologic study was conducted for the Project site to detail the hydrology characteristics of the site and develop specific design recommendations to ensure the finished floor elevation of the proposed building is well above the 100-year flood level.
Policy 1.6. The City should require a hydrologic study, including the analysis of effects on downstream and upstream properties and on the flood-carrying characteristics of the stream, for development proposed in the floodplain.	**Consistent.** As part of the Project design process, a site-specific hydrologic study was conducted for the Project site to detail the hydrology characteristics of the site and develop specific design recommendations to ensure the finished floor elevation of the proposed building is well above the 100-year flood level.
Objective 2.0. Minimize the loss of life and destruction of property in Santee caused by seismic and geologic hazards.	**Consistent.** As part of the Project design process, a site-specific Geotechnical Investigation was conducted for the Project site to detail the geotechnical characteristics of the site and develop specific design recommendations to ensure the structural integrity of the Project. As discussed in Chapter 5, Effects Found Not To Be Significant, the Project would be designed consistent with applicable regulatory requirements that would address potential impacts associated with seismic and geologic hazards.
Policy 2.2. The City should ensure that if a project is proposed in an area identified herein as seismically and/or geologically hazardous, the proposal shall demonstrate through appropriate geologic studies and investigations that either the unfavorable conditions do not exist in the specific area in question or that they may be avoided or mitigated through proper site planning, design and construction.	**Consistent.** As discussed in Chapter 5, Effects Found Not To Be Significant, the Project would be designed consistent with applicable regulatory requirements that would address potential geologic and seismic hazards. Further, as part of the Project design process, a site-specific Geotechnical Investigation was conducted for the Project site to detail the geotechnical characteristics of the site and develop

Table 4.9-1. Consistency with City of Santee General Plan Goals, Objectives, and Policies

Goals	Response
	specific design recommendations to ensure the structural integrity of the Project.
Policy 2.3. The City shall require that all potential geotechnical and soil hazards be fully investigated at the environmental review stage prior to project approval. Such investigations shall include those identified by Table 8.1, Determination of Geotechnical Studies Required, and such soil studies as may be warranted by results of the Initial Environmental Study.	**Consistent.** As discussed in Chapter 5, Effects Found Not To Be Significant, the Project would be designed consistent with applicable regulatory requirements that would address potential geotechnical and soil hazards. Further, as part of the Project design process, a site-specific Geotechnical Investigation was conducted for the Project site to detail the geotechnical and soil characteristics of the site and develop specific design recommendations to ensure the structural integrity of the Project.
Objective 3.0. Minimize the risk of damage to persons, property and the environment caused by hazardous materials.	**Consistent.** As discussed in Chapter 4.7, Hazards and Hazardous Materials, all hazardous materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Further, a Phase I study was prepared for the site and vicinity. No hazardous materials were found onsite, and any previously identified hazardous conditions in the project vicinity have been cleaned up and cases closed.
Policy 4.11. In order to minimize fire hazards, the Santee Fire and Life Safety Department shall routinely be involved in the review of development applications. Considerations shall be given to adequate emergency access, driveway widths, turning radii, fire hydrant locations and needed fire flow requirements.	**Consistent.** As part of the Project's plan review process, the Project's plans have been reviewed by the Santee Fire Department. Adequate emergency access, driveway widths, turning radii, fire hydrant locations and fire flow requirements have been incorporated into the proposed Project.
Mobility	
Policy 2.1. The City shall encourage an automobile Level of Service "D" on street segments and at intersections throughout the circulation network while also maintaining or improving the effectiveness of the non-automotive components of the circulation system (i.e. pedestrians, bicyclists, and public transit), especially in the Town Center area. The City may approve a lower automobile Level of Service if it finds that the effectiveness of non-automotive components of the circulation system would be maintained or improved as a result. In other cases, the City shall not approve any development that causes a drop in the level of service at a street segment or an intersection to LOS "E" or "F", after feasible mitigation, without overriding social, economic, or other benefits.	**Consistent.** As discussed in Section 4.12, Transportation, and the Transportation Impact Study (Appendix L), the applicant has prepared a detailed memorandum (Appendix L of the TIS which is included as Appendix L of this EIR) describing consistency of the improvements proposed by the Project with the City's Mobility Element goals and policies.

As described in Table 4.9-1, the Project would be consistent with the applicable goals and policies set forth by the City's General Plan. Therefore, impacts would be **less than significant**.

SANDAG 2021 Regional Plan/Sustainable Communities Strategy

The 2021 Regional Plan (RP)/Sustainable Communities Strategy (SCS) was adopted on December 10, 2021, and presents the land use and transportation vision for the region through the year 2050, providing a long-term investment framework for addressing the region's challenges. The RP/SCS establishes goals for the region and identifies transportation investments that address the region's growing population, as well as strategies to reduce traffic congestion, air pollution, and GHG emissions. In addition, the RP/SCS is supported by a combination of transportation and land use strategies that help the region achieve state GHG emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support the region's vital goods movement industry, and utilize resources more efficiently (SANDAG 2021).

Consistency with the 2021 RP/SCS goals, below, demonstrates that the Project would not conflict with the applicable goals in the RP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Table 4.9-2 demonstrates how the Project promotes consistency with the guiding principles and policies of the RP/SCS.

Table 4.9-2. Consistency with 2021 RP/SCS Goals

RP/SCS Goal	Project Applicable Component(s)
Goal 1 The efficient movement of people and goods	**Consistent.** The Project would include construction and operation of an industrial warehouse that would be easily and efficiently accessible to SR-67 and SR-52 which would help to facilitate regional goods movement throughout Southern California.
Goal 2 Access to affordable reliable, and safe mobility options for everyone	**Consistent.** The proposed Project site is located along a designated truck route within the City, and these truck routes extend to easily accessible freeway on and off-ramps to SR-67 and SR-52. Locating the proposed warehouse building at the subject site would allow for reliable and safe transport of goods.
Goal 3 Healthier air and reduced GHG emissions regionwide	**Consistent.** The Project would involve development of a warehouse/industrial use that inherently involves the emission of GHG and air contaminant emissions. As discussed in Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions, the Project would implement mitigation measures to reduce air quality and greenhouse gas emissions to the maximum extent feasible. In addition, according to SANDAG's Goods Movement Plan and the San Diego & Imperial Counties Sustainable Freight Implementation Strategy, the region will run out of suitably zoned vacant land designated for warehouse facilities in or around 2030. Thus, the Project would meet the growing demand warehousing space, and would do so in an area that is proximate to regional highways (i.e., SR-67 and SR-57), thereby reducing the need for longer distance trips which could result in additional air pollutant and GHG emissions. Additionally, the Project will install 16 EV charging stations in accordance with CALGreen standards to support electric vehicle use thereby reducing toxic air contaminants and their effect on GHG. The project would also employ approximately 185 workers, helping the City better meet its jobs/housing balance (See existing setting and Project objectives discussion in Chapter 3, Project Description), which should shorten commute distances of City residents who choose to work on the Project site, which would have a direct positive effect on tailpipe GHG and air contaminant emissions.

As described in Table 4.9-2, the Project would be consistent with the applicable goals set forth by SANDAG in the 2021 Regional Plan. Therefore, impacts would be **less than significant**.

SDAPCD

The Project's consistency with the SDAPCD's plan is addressed in detail in 4.2, Air Quality. As concluded in Section 4.2, the Project is consistent with the underlying land use and zoning for the Project site. Therefore, the Project source emissions are not anticipated to result in air quality impacts that were not previously envisioned in the growth projections and RAQS, and implementation of the Project would not result in development in excess of that anticipated in local plans or increases beyond those contemplated by SANDAG. Because the proposed land uses and associated vehicle trips are anticipated in local air quality plans, the Project would be consistent at a regional level with the underlying growth forecasts in the RAQS. Accordingly, the Project would not conflict with and would not obstruct implementation of applicable local and regional air quality plans; impacts would be **less than significant**.

San Diego County RTCIP/RAS

The Project's consistency with the San Diego County RTCIP/RAS is addressed in Section 4.12, Transportation. As concluded in Section 4.12, the Project would not conflict with the San Diego County RTCIP/RAS LOS standards for the RTCIP arterial roadway and freeway network. Land use and planning impacts associated with RTCIP consistency would thus be **less than significant**.

4.9.5 Mitigation Measures and Level of Significance After Mitigation

All impacts related to land use and planning would be less than significant. No mitigation is required.

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4.10 Noise

This section describes the existing noise conditions of the Palisade Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to implementation of the Project.

In addition to the documents incorporated by reference (see Section 2.7 of Chapter 2 of this EIR), the following analysis is based, in part, on the following sources:

- Noise Technical Report, prepared by Dudek in May 2024 (Appendix K)

4.10.1 Existing Conditions

Noise and Vibration Characteristics

Noise

Sound may be described in terms of level or amplitude (measured in decibels [dB]), frequency or pitch (measured in hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the amplitude of sound is the decibel. Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against low and very high frequencies in a manner approximating the sensitivity of the human ear. Several descriptors of noise (noise metrics) exist to help predict average community reactions to the adverse effects of environmental noise, including traffic-generated noise, on a community. These descriptors include the equivalent noise level over a given period (L_{eq}), the statistical sound level (L_n), the day–night average noise level (L_{dn}), and the Community Noise Equivalent Level (CNEL). Each of these descriptors uses units of dBA. Table 4.10-1 provides examples of A-weighted noise levels from common sounds. In general, human sound perception is such that a change in sound level of 3 dB is barely noticeable; a change of 5 dB is clearly noticeable; and a change of 10 dB is perceived as doubling or halving of the sound level.

L_{eq} is a sound energy level averaged over a specified period (typically no less than 15 minutes for environmental studies). L_{eq} is a single numerical value that represents the amount of variable sound energy received by a receptor during a time interval. For example, a 1-hour L_{eq} measurement would represent the average amount of energy contained in all the noise that occurred in that hour. L_{eq} is an effective noise descriptor because of its ability to assess the total time-varying effects of noise on sensitive receptors (see below for definition of sensitive receptors). L_{max} is the greatest sound level measured during a designated time interval or event.

Unlike the L_{eq} metrics, L_{dn} and CNEL metrics always represent 24-hour periods, usually on an annualized basis. L_{dn} and CNEL also differ from L_{eq} because they apply a time-weighted factor designed to emphasize noise events that occur during the evening and nighttime hours (when speech and sleep disturbance is of more concern). “Time weighted” refers to the fact that L_{dn} and CNEL penalize noise that occurs during certain sensitive periods. In the case of CNEL, noise occurring during the daytime (7:00 a.m.–7:00 p.m.) receives no penalty. Noise during the evening (7:00 p.m.–10:00 p.m.) is penalized by adding 5 dB, while nighttime (10:00 p.m.–7:00 a.m.) noise is penalized by adding 10 dB. L_{dn} differs from CNEL in that the daytime period is defined as 7:00 a.m.–10:00 p.m., thus eliminating the evening period. L_{dn} and CNEL are the predominant criteria used to measure roadway noise

affecting residential receptors. These two metrics generally differ from one another by no more than 0.5 dB to 1 dB, and as such are often treated as equivalent to one another.

Table 4.10-1. Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
—	110	Rock band
Jet flyover at 300 meters (1,000 feet)	100	—
Gas lawn mower at 1 meter (3 feet)	90	—
Diesel truck at 15 meters (50 feet), at 80 kph (50 mph)	80	Food blender at 1 meter (3 feet) Garbage disposal at 1 meter (3 feet)
Noisy urban area, daytime gas lawn mower at 30 meters (100 feet)	70	Vacuum cleaner at 3 meters (10 feet)
Commercial area Heavy traffic at 90 meters (300 feet)	60	Normal speech at 1 meter (3 feet)
Quiet urban daytime	50	Large business office Dishwasher, next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural night time	20	Bedroom at night, concert hall (background)
—	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: Caltrans 2013.
Notes: dBA = A-weighted decibels; kph = kilometers per hour; mph = miles per hour.

Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earthmoving equipment.

Several different methods are used to quantify vibration. Peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square amplitude is most frequently used to describe the effect of vibration on the human body and is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure root mean square. VdB acts to compress the range of numbers required to describe vibration.

High levels of vibration may cause physical personal injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. In addition, high levels of vibration can damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes). Most perceptible indoor vibration is caused by sources

within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would be considered noise and vibration sensitive and may warrant unique measures for protection from intruding noise.

The closest sensitive receptors to the Project site are the existing residences located approximately 310 feet from the Project driveway, south of North Woodside Avenue, and 650 feet north of the Project boundary, north of the San Diego River.

Existing Noise Conditions

Sound pressure level (SPL) measurements were conducted near the proposed project site on March 25, 2023, to quantify and characterize the existing outdoor ambient sound levels. Another set of SPL measurements were conducted near the proposed project site on March 18 and 19, 2024, to help further characterize the existing outdoor noise levels for the single-family residences located north of the San Diego River.

Table 4.10-2 provides the location and time period at which these baseline noise level measurements were performed by an attending Dudek field investigator. The March 2023 measurements were conducted using a Rion-branded Model NL-52 sound level meter (SLM) equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The SLM meets the current American National Standards Institute standard for a Type 1 (Precision Grade) sound level meter, while the March 2024 measurements were made using a SoftdB “Piccolo” model sound level meter equipped with a windscreen-protected, 0.5-inch diameter pre-polarized condenser microphone with pre-amplifier. The sound level meter meets the current American National Standards Institute (ANSI) standard for a Type 2 (General Use) sound level meter.

The accuracy of the SLM was verified using a field calibrator before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Five (5) short-term (ST) noise level measurement locations (ST1–ST5) that represent existing noise-sensitive receivers were selected on and near the proposed Project site. These locations are depicted as receivers ST1–ST5 on Figure 4.10-1. The measured L_{eq} and L_{max} noise levels are provided in Table 4-10-2. The primary noise sources at the sites identified in Table 4-10-2 consisted of traffic along adjacent roadways, aircraft, the sounds of leaves rustling, conversations, and birdsong during the daytime, and frog noise at night. As shown in Table 4-10-2, the measured daytime SPL ranged from 53.1 dBA L_{eq} at ST4 to 76.8 dBA L_{eq} at ST1, and the measured nighttime SPL ranged from 50.2 at ST2 to 51.2 at ST5. Beyond the summarized information presented in Table 4.10-2, detailed noise measurement data is included in Appendix K.

Table 4.10-2. Measured Baseline Outdoor Ambient Noise Levels

Site	Location/Address	Time	L_{eq} (dBA)	L_{max} (dBA)
ST1	East of Woodside Avenue at Shadow Hill Apartments	2023-03-25, 9:01 AM to 9:06 AM	76.8	84.3
ST2	Cul-de-sac of Hillcreek Way	2023-03-25, 9:25 AM to 9:35 AM	55.6	66.8
	South from the cul-de-sac of Hillcreek Way, along Walker Preserve Trail	2024-03-19, 1:14 PM to 2:14 PM	53.8	75.5
		2024-03-18, 8:21 PM to 9:21 PM	50.2	73.9
ST3	Southern project boundary	2023-03-25, 10:25 AM to 10:35 AM	60.3	75.5
ST4	Walker Preserve Trail, northwest of project boundary	2023-03-25, 9:45 AM to 10:00 AM	53.1	71.2
		2024-03-19, 1:22 PM to 2:22 PM	54.1	75.4
		2024-03-18, 8:28 PM to 9:28 PM	50.5	64.1
ST5	Walker Preserve Trail, north of project boundary	2024-03-19, 1:29 PM to 2:29 PM	55.2	75.9
		2024-03-18, 8:40 PM to 9:40 PM	51.2	58.2

Source: Appendix K.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); L_{max} = maximum sound level during the measurement interval; dBA = A-weighted decibels; ST = short-term noise measurement locations.

Generally, the measured samples of daytime L_{eq} agree with expectations: ST1 and ST3 L_{eq} values are above 60 dBA due largely to their proximity to Highway 67. ST2, ST4, and ST5, however, are in residential and trail areas north of the proposed Project and are more distant from these sources of traffic noise, which results in a substantially lower sampled L_{eq} value. Noise measurements were not conducted during time periods when the swap meet was operating. Therefore, the ambient noise level measurements conducted for the Project are likely lower than ambient noise levels when the swap meet is operational.

4.10.2 Relevant Plans, Policies, and Ordinances

Federal

Federal Transit Administration

In its Transit Noise and Vibration Impact Assessment guidance manual, the FTA recommends a daytime construction noise level threshold of 80 dBA L_{eq} over an 8-hour period (FTA 2018) when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such noise limits at the state and local jurisdictional levels.



SOURCE: Google 2024; Dudek 2024

DUDEK

FIGURE 4.10-1

Noise Measurement Locations

Palisades Santee Commerce Center Project

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Federal Interagency Committee on Noise

Some guidance regarding the determination of a substantial permanent increase in ambient noise levels in the project vicinity above existing levels is provided by the 1992 findings of the Federal Interagency Committee on Noise (FICON 1992), which assessed the annoyance effects of changes in ambient noise levels resulting from aircraft operations. The FICON recommendations are based upon studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. Annoyance is a qualitative measure of the adverse reaction of people to noise that generates speech interference, sleep disturbance, or interference with the desire for a tranquil environment.

The rationale for the FICON recommendations is that it is possible to consistently describe the annoyance of people exposed to transportation noise in terms of L_{dn}. The changes in noise exposure that are shown below are expected to result in equal changes in annoyance at sensitive land uses. Although the FICON recommendations were specifically developed to address aircraft noise impacts, they are used in this analysis to define a substantial increase in community noise levels related to all transportation noise sources and permanent non-transportation noise sources.

- Outdoor ambient sound level without the project is less than 60 dBA L_{dn}, then a project-attributed increase of 5 dBA or more would be considered significant;
- Outdoor ambient sound level without the project is between 60 and 65 dBA L_{dn}, project-attributed increase of 3 dBA or more would be considered significant; and
- Outdoor ambient sound level without the project is greater than 65 dBA L_{dn}, then project-attributed increase of 1.5 dBA or more would be considered significant.

State

California Code of Regulations, Title 24

Title 24 of the California Code of Regulations sets standards that new developments in California must meet. According to Title 24, interior noise levels are not to exceed 45 dBA CNEL in any habitable room (ICC 2019).

California Department of Health Services Guidelines

The California Department of Health Services has developed guidelines of community noise acceptability for use by local agencies (OPR 2017). Selected relevant levels are listed here:

- Below 60 dBA CNEL: normally acceptable for low-density residential use
- 50 to 70 dBA CNEL: conditionally acceptable for low-density residential use
- Below 65 dBA CNEL: normally acceptable for high-density residential use and transient lodging
- 60 to 70 dBA CNEL: conditionally acceptable for high-density residential, transient lodging, churches, educational, and medical facilities

The normally acceptable exterior noise level for high-density residential use is up to 65 dBA CNEL. Additionally, this exterior noise level limit is consistent with the City of Santee General Plan Noise Element, which considers multi-family unit noise-sensitive land uses.

California Department of Transportation

In its *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020), the California Department of Transportation (Caltrans) recommends 0.5 ips PPV as a threshold for the avoidance of structural damage to typical newer residential buildings exposed to continuous or frequent intermittent sources of groundborne vibration. For transient vibration events, such as blasting, the damage risk threshold would be 1.0 ips PPV (Caltrans 2020) at the same type of newer residential structures. For older structures, these guidance thresholds would be more stringent: 0.3 ips PPV for continuous/intermittent vibration sources, and 0.5 ips PPV for transient vibration events. With respect to human annoyance, Caltrans guidance indicates that building occupants exposed to continuous groundborne vibration in the range of 0.2-0.6 ips PPV would find it "unpleasant or "annoying" and thus a likely significant impact. Although these Caltrans guidance thresholds are not regulations, they can serve as quantified standards in the absence of such limits at the local jurisdictional level.

Local

City of Santee Noise Level Compatibility Standards

The Noise Element of the City's General Plan (City of Santee 2003) establishes target maximum noise levels in the City, categorized by land use. The Noise Element sets the following limitations on noise levels for receiving properties adjacent to the project site. Figure 4.10-2 contains the Noise / Land Use Compatibility Guide from the General Plan Noise Element, which establishes a maximum noise level of 65 dBA L_{dn} for noise-sensitive land uses and 75 dBA L_{dn} for industrial land uses.

Transportation-Related Noise Standards

The City's Noise Element establishes a policy for exterior sensitive areas to be protected from high traffic noise levels. The Noise Element sets 65 dBA L_{dn} for exterior noise levels and 45 dBA L_{dn} for interior noise levels as the "normally acceptable" level.

For interior noise, the Noise Element also establishes 45 dBA L_{dn} as the maximum acceptable level for habitable rooms when exterior predicted noise levels due to traffic are 65 dBA L_{dn} or more. If windows and doors are required to be closed to meet this standard, then mechanical ventilation (i.e., air conditioning) shall be included in the project design.

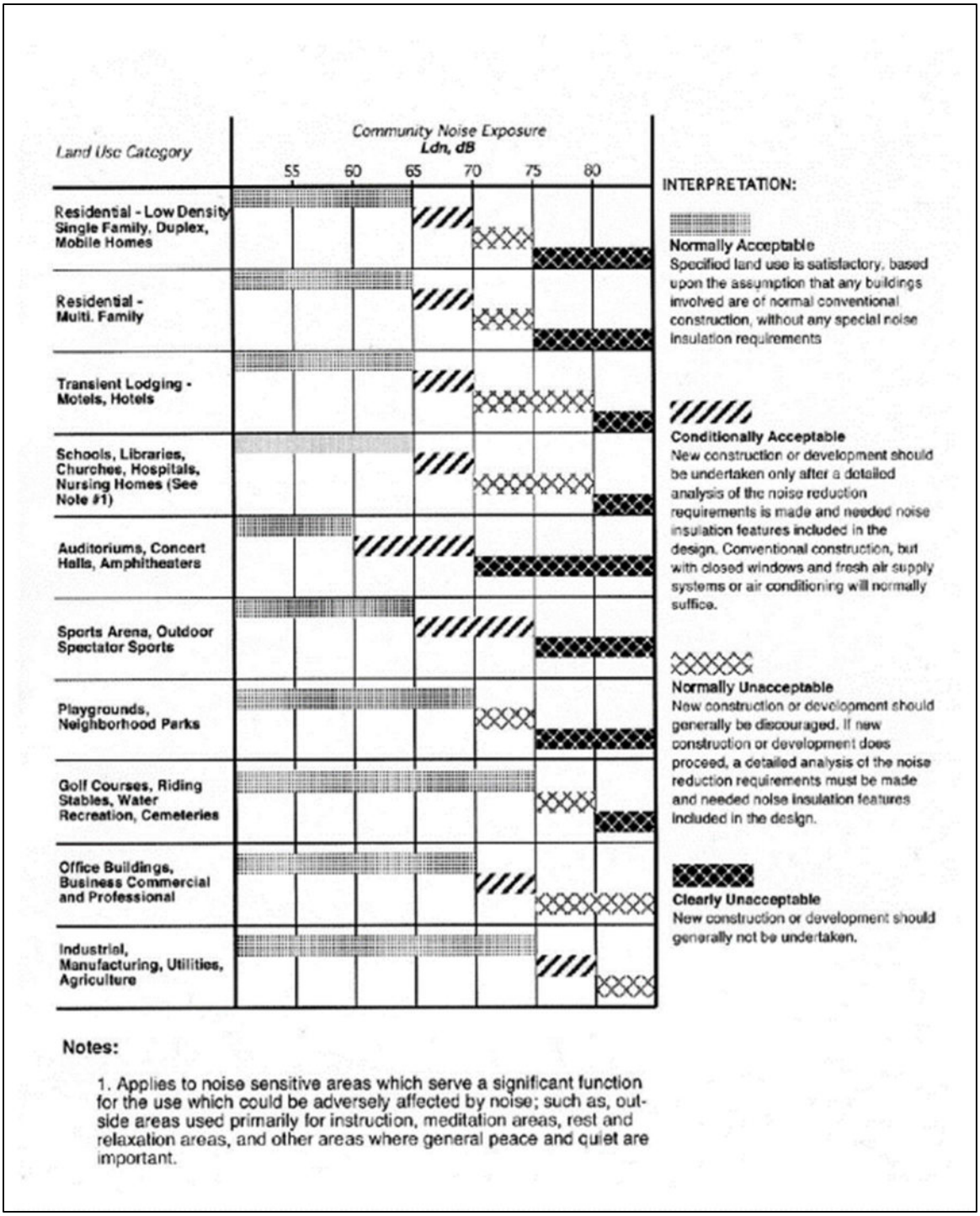


Figure 4.10-2 City of Santee Noise / Land Use Compatibility Guide

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City of Santee General Plan

Noise Element

The Noise Element contains a section on the noise abatement and control objectives and policies for the City, a selection of which is presented here.

Objective 1.0 Control noise from sources adjacent to residential, institutional and other noise-sensitive receptors.

Policy 1.1 The City shall support a coordinated program to protect and improve the acoustical environment of the City including development review for new public and private development and code compliance for existing development.

Policy 1.2 The City shall utilize noise studies and noise contour maps when evaluating development proposals during the discretionary review process.

Policy 1.3 The City shall enforce motor vehicle laws and standards as appropriate, related to traffic flow and speed, in an effort to reduce noise along roadways experiencing high noise levels.

Policy 1.4 The City shall promote alternative sound attenuation measures rather than traditional wall barriers wherever feasible; these may include glass or polycarbonate walls, berms, landscaping, and the siting of noise-sensitive uses on a parcel away from the roadway or other noise source.

Policy 1.5 The City shall review future projects with particular scrutiny regarding the reduction of unnecessary noise near noise-sensitive areas such as hospitals, schools, parks, etc.

Policy 1.6 The City shall continue to monitor noise throughout Santee and enforce the standards and regulations of the City's Noise Ordinance.

Policy 1.15 The City shall encourage Caltrans to recognize and implement the City’s noise standards for planned and future freeway projects in the City.

Policy 1.16 The City shall ensure that appropriate regulations and standards are incorporated into the City's development policies and ordinances, including the use of noise evaluations in Environmental Impact Reports and statements, which take all aspects of noise into consideration.

Policy 1.17 The City shall officially support the control of noise through legal regulations and cooperative government efforts.

Objective 2.0 Ensure that future developments will be constructed to minimize interior and exterior noise levels.

Policy 2.1 The City shall adhere to planning guidelines and building codes which include noise control for the exterior and interior living space of all new residential developments within noise impacted areas.

Policy 2.2 The City should require new development to mitigate noise impacts to existing uses resulting from new development when: 1) such development adds traffic to existing City streets that necessitates the widening of the street; and 2) the additional traffic generated by the new development causes the noise standard or significance thresholds to be exceeded.

Policy 2.3 The City should not require new development to mitigate noise impacts to existing uses when the new development only adds traffic already anticipated by the City's General Plan to an existing street, but does not necessitate widening of that street.

City of Santee Noise Ordinance

Construction activities are subject to Section 5.04.090 of the City's Noise Ordinance, which specifically prohibits the operation of any single or combination of powered construction equipment at any construction site on Mondays through Thursday except between the hours of 7:00 a.m. and 7:00 p.m. Further, construction equipment with a manufacturer's noise rating of 85 dBA L_{max} or greater may only operate at a specific location for 10 consecutive workdays. A notice must be provided to all property owners within 300 feet if work is scheduled for more than 10 days and must be provided no later than 10 days prior to the start of the construction.

The Project would include loading and unloading activities as part of Project operation. Therefore, Project operations would be subject to Municipal Code Section 5.04.130 which makes it unlawful for any person to engage in loading, unloading, opening, idling of trucks, closing or other handling of boxes, crates, containers, building materials, garbage cans, dumpsters or similar objects between the hours of 10:00 p.m. and 7:00 a.m. in such a manner as to cause a noise disturbance within or adjacent to a residential district.

Municipal Code Section 5.04.160 applies to any noise source not specifically addressed in this chapter, except where exempted or excluded by Section 5.04.170. This Section states that it is unlawful for any person to generate any noise on the public way that is louder than average conversational level at a distance of 50 feet or more, vertically or horizontally, from the source between 10:00 p.m. and 7:00 a.m. Also, between 10:00 p.m. and 7:00 a.m., no person is permitted to generate any noise on any private open space that is louder than average conversational level at a distance of 50 feet or more, measured from the property line of the property from which the noise is being generated.

4.10.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts related to noise are based on California Environmental Quality Act (CEQA) Appendix G. According to CEQA Guidelines Appendix G, a significant impact related to noise would occur if the Project would:

A. 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.
B. Result in generation of excessive groundborne vibration or groundborne noise levels.
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, expose people residing or working in the Project area to excessive noise levels.

In light of these above significance criteria, this analysis uses the following standards to evaluate potential noise and vibration impacts.

- Construction noise –The apparent proximity of existing residential receptors located south of North Woodside Avenue suggests that source-to-receiver distances are a minimum of approximately 310 feet. Additionally, most construction equipment and vehicles on a project site do not operate

continuously. Therefore, consistent with the FTA guidance mentioned in Section 4.10.2, this analysis will use 80 dBA L_{eq} over an 8-hour period as the construction noise impact criterion during daytime hours (7:00 a.m. to 7:00 p.m.).

- **Off-site project-attributed transportation noise –** For purposes of this analysis, a noise impact due to transportation noise would be considered significant if predicted noise levels exceeded the FICON thresholds noted in Section 4.10.2. More specifically, an impact due to the project contribution to existing and future predicted ambient noise levels would be considered significant if it meets the following criteria:
  - Outdoor ambient sound level without the project is less than 60 dBA Ldn, then a project-attributed increase of 5 dBA or more would be considered significant;
  - Outdoor ambient sound level without the project is between 60 and 65 dBA Ldn, project-attributed increase of 3 dBA or more would be considered significant; and
  - Outdoor ambient sound level without the project is greater than 65 dBA Ldn, then project-attributed increase of 1.5 dBA or more would be considered significant.
- **Off-site project-attributed stationary noise –** For purposes of this analysis, a noise impact would be considered significant if noise from typical operation of heating, ventilation, and air conditioning (HVAC), truck movements, and other electro-mechanical systems associated with the proposed project exceeded 75 dBA L_{dn} at the property line. Note that these are the City's thresholds for the industrial zones that characterize the proposed project site. For residential land uses near the project site, a noise impact would be considered significant if noise from typical operations exceeds 65 dBA L_{dn}.
- **Construction vibration –** Guidance from Caltrans indicates that a vibration velocity level of 0.2 ips PPV received at a structure would be considered annoying by occupants within (Caltrans 2013. As for the receiving structure itself, aforementioned Caltrans guidance from Section 4.10.2 recommends that a vibration level of 0.3 ips PPV would represent the threshold for building damage risk.

4.10.4 Impacts 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?

Short-Term Construction Impacts

Less-than-Significant Impact. Construction noise and vibration are temporary phenomena, with emission levels varying from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and receptor. Equipment that would be in use during construction would include, in part, graders, backhoes, rubber-tired dozers, loaders, cranes, forklifts, pavers, rollers, and air compressors. The typical maximum noise levels at a distance of 50 feet from various pieces of construction equipment and activities anticipated for use on the proposed project site are presented in Table 4.10-3. Note that the equipment noise levels presented in Table 4.10-3 are maximum noise levels. Usually, construction equipment operates in alternating cycles of full power and low power, producing average noise levels over time that are less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 4.10-3. Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (L_{max}, dBA at 50 Feet)
All Other Equipment > 5 HP	85
Backhoe	78
Compressor (air)	78
Concrete Saw	90
Crane	81
Dozer	82
Excavator	81
Flat Bed Truck	74
Front End Loader	79
Generator	72
Grader	85
Man Lift	75
Paver	77
Roller	80
Scraper	84
Welder / Torch	73

Source: DOT 2006.
Note: L_{max} = maximum sound level; dBA = A-weighted decibels.

Aggregate noise emission from proposed Project construction activities, broken down by sequential phase, was predicted at two evaluation distances to the nearest existing noise-sensitive receptor: 1) from the nearest position of the construction site boundary and 2) from the geographic center of the construction site, which serves as the time-averaged location or geographic *acoustical centroid* of active construction equipment for the phase under study. The intent of the former distance is to help evaluate anticipated construction noise from equipment or vehicle activity expected to be at the boundary for some period of time, which would be most appropriate for phases such as site preparation, grading, and paving. The latter distance is used in a manner similar to the general assessment technique as described in the FTA guidance for construction noise assessment, when the location of individual equipment for a given construction phase is uncertain over some extent of (or the entirety of) the construction site area. In this studied scenario, because of the equipment location uncertainty, all the equipment for a construction phase is assumed to operate—on average—from the acoustical centroid position. Table 4.10-4 summarizes these two distances to the apparent closest noise-sensitive receptor for each of the six sequential construction phases. At the site boundary, this analysis assumes that all equipment of each listed type per phase will be involved in the construction activity for the full 8-hour period. For the acoustical centroid case, which intends to be a geographic average position for all equipment during the indicated phase, this analysis assumes that the equipment may be operating up to eight hours per day.

Table 4.10-4. Estimated Distances between Construction Activities and the Nearest Noise-Sensitive Receptors

Construction Phase (and Equipment Types Involved)	Distance from Nearest Noise-Sensitive Receptor to Construction Site Boundary (Feet)	Distance from Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (Feet)
Demolition (concrete saw, excavator, dozer)	310	990
Site Preparation (dozer, front end loader)	310	990
Grading (excavator, grader, dozer, scraper backhoe)	310	990
Building construction (crane, man-lift, generator, backhoe, welder)	310	990
Paving (paver, roller, concrete mixer truck)	310	990
Architectural Coating (compressor)	310	990

A Microsoft Excel–based noise prediction model emulating and using reference data from the Federal Highway Administration Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use. Although the RCNM was funded and promulgated by the Federal Highway Administration, it is often used for non-roadway projects, because the same types of construction equipment used for roadway projects are often used for other types of construction. Input variables for the predictive modeling consist of the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of time within a specific time period, such as an hour, when the equipment is expected to operate at full power or capacity and thus make noise at a level comparable to what is presented in Table 4.10-3), and the distance from the noise-sensitive receiver. The predictive model also considers how many hours that equipment may be on-site and operating (or idling) within an established work shift. Conservatively, no topographical or structural shielding was assumed in the modeling. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis, which is detailed in Appendix K, and produced the predicted results displayed in Table 4.10-5.

Table 4.10-5. Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Demolition (concrete saw, excavator, dozer)	66.5	55.3
Site Preparation (dozer, front end loader)	64.3	53.1
Grading (excavator, grader, dozer, scraper backhoe)	67.0	55.8

Table 4.10-5. Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Building construction (crane, man-lift, generator, backhoe, welder)	60.8	49.5
Paving (paver, roller, concrete mixer truck)	60.6	49.3
Architectural Coating (compressor)	52.5	41.2

Notes: L_{eq} = equivalent noise level; dBA = A-weighted decibels.

As presented in Table 4.10-5, the highest estimated construction noise levels are predicted to stay below 67 dBA L_{eq} over an 8-hour period at the nearest existing residences (located south of North Woodside Avenue and as close as 310 feet from the project driveway) when grading activities take place near the project driveway. Residences further afield, such as those to the north of the project site, would be predicted to have lower construction noise levels than those shown in Table 4.10-5. Additionally, the nearest existing residences to the south are dominated by traffic noise from SR-67, and intervening barriers and terrain were not considered in the model. As a result, short-term construction noise is predicted to be well below the FTA guidance of 80 dBA L_{eq} over an 8-hour period, and therefore is **less than significant**.

Short-Term Off-Site Construction Noise

Less-than-Significant Impact. The Project would result in local, short-term increases in roadway noise as a result of construction traffic. Based on information developed as part of the Project's air quality analysis, Project-related traffic would include workers commuting to and from the Project site as well as vendor and haul trucks bringing or removing materials. The highest number of average daily worker trips would be 122 trips, occurring during the building construction phase. The highest number of average daily vendor truck trips would be 48 trips, also occurring during the building construction phase. The highest number of total haul truck trips would be 6,675 trips, occurring during the demolition phase over a period of 25 days. Based upon available data provided in the Transportation Impact Study (TIS) (Appendix L), existing Average Daily Traffic (ADT) volumes were combined with the construction truck haul trips (an average of 275 haul trucks per day) and truck percentages found in the Project's TIS were derived to include the increase in heavy trucks and applied to all of the studied roadway ADTs to determine the potential noise level increase due to construction noise. Aside from the Project driveway, it is not known which roadways will be used to route construction traffic. Therefore, applying the average of 275 haul trucks per day to all studied Project roadway ADTs represents an extremely conservative prediction methodology.

The change in roadway noise levels was predicted for two conditions: existing and existing plus average daily haul truck construction traffic. Traffic noise levels were calculated for roadway segments bounded by intersections within the Project area and are listed as follows:

- **Project Driveway –** From N. Woodside Avenue to the Project;
- **Wheatlands Avenue –** From N. Woodside Avenue to Wheatlands Road;
- **N. Woodside Avenue –** From Wheatlands Avenue to Woodside Avenue (combined north/south split);

- **Woodside Avenue –** From Magnolia Avenue to the Woodside Avenue north/south split;
- **Magnolia Avenue –** From Woodside Avenue to SR-52; and
- **SR-67**.

Based upon the FICON thresholds presented above, an increase of less than 5 dBA when the ambient sound level is less than 60 dBA L_{dn}/CNEL, less than 3 dBA when the ambient sound level is between 60 and 65 dBA L_{dn}/CNEL, or less than 1.5 dBA when the ambient sound level is greater than 65 dBA L_{dn}/CNEL would not be significant. Utilizing the traffic noise modeling worksheets found in Appendix K, Table 4.10-6 shows that the highest predicted change in traffic noise level (the Project driveway) combined with the roadways surrounding the immediate Project site are predicted to experience an aggregate total traffic noise level of 85 dBA at 50 feet for the existing condition with a predicted increase of less than 1 dBA due to the Project contribution. Although the aggregate predicted "with Project construction traffic" condition is greater than the City limit as summarized in Section 4.10.2, the predicted "without Project construction traffic" level at the nearest sensitive receivers is also greater than the City limit, with a predicted "with Project" increase of less than 1 dBA, which is less than the FICON 1.5 dBA threshold when the ambient sound level is greater than 65 dBA L_{dn}/CNEL, and would be considered imperceptible to the average person. Additionally, although the increase in noise level for the Project driveway is greater than 5 dBA and therefore higher than the FICON thresholds and perceptible to the average person, there are no noise-sensitive receptors adjacent to the Project driveway; the nearest noise-sensitive receptors to the south of the Project are already dominated by much higher levels of traffic noise from nearby adjacent roadways such as SR-67. Therefore, potential impacts at existing off-site noise-sensitive land uses along roadway segments identified in Table 4.10-6 and with respect to Project-generated temporary construction traffic to existing traffic noise would be **less than significant**.

Table 4.10-6. Predicted Construction Traffic Noise Levels

Modeled Roadway Segment	From	To	Existing (dBA CNEL)	Existing Plus Project Construction Traffic (dBA CNEL)	Delta (dBA)
Project Driveway	N. Woodside Avenue	Project	50.38	60.26	9.88
Wheatlands Avenue	N. Woodside Avenue	Wheatlands Road	61.82	63.93	2.11
N. Woodside Avenue	Wheatlands Avenue	Woodside Avenue - Combined	67.76	68.70	0.95
Woodside Avenue	Magnolia Avenue	Woodside Avenue - Combined	77.40	77.54	0.14
Magnolia Avenue	Woodside Avenue	SR-52	77.15	77.27	0.12
SR-67			83.50	83.55	0.05
		Aggregate Total @ 50 Feet	**85.29**	**85.41**	**0.12**
		Project Driveway, Wheatlands Avenue, SR-67 Segment Aggregate Total @ 50 Feet	**83.64**	**83.76**	**0.11**

Best Practices for Limiting Construction Noise

Despite the construction noise analysis above showing that the impact to noise-sensitive receivers would be less than significant, the following is a list of best practices for limiting construction noise that should be implemented by the contractor:

- The Project contractor shall, to the extent feasible, schedule construction activities to avoid concurrent operation of several pieces of construction equipment proximate to an offsite noise-sensitive receptor.
- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers.
- Construction noise reduction methods such as shutting off idling equipment, maximizing the distance between construction equipment staging areas and adjacent residences, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective actions shall be implemented, and a report of the action provided to the reporting party.

Long-Term Operational Impacts

Off-Site Traffic Noise Exposure

Less-than-Significant Impact. The project is expected to generate an additional 1,440 average daily trips to the roadway system, as shown in Table 4.12-1 within Section 4.12, Transportation. During the afternoon (PM) peak-hour (the highest of the AM and PM peak hours), approximately 148 passenger car equivalent vehicles are estimated to enter or exit the Project site. Utilizing this information as well as additional traffic data provided in Appendix K, the Federal Highway Administration's Highway Traffic Noise Prediction Model RD-77-108 was used to estimate potential noise impacts at adjacent noise-sensitive uses. Information used in the model included Average Daily Traffic (ADT), posted traffic speeds, truck mix percentage, and day/evening/night mix percentage.

Consistent with Caltrans guidance (Caltrans 2013), this analysis assumes 80% of the ADT occurs during daytime hours (7:00 a.m. to 7:00 p.m.), 5% during the evening (7:00 p.m. to 10:00 p.m.), and 15% during the nighttime (10:00 p.m. to 7:00 a.m.). The future modeled traffic speed was assumed to be the anticipated speed limit for the studied future roads, which is 45 miles per hour (mph) for Woodside Avenue, 40 mph for N. Woodside Avenue and Magnolia Avenue, and 25 mph for Wheatlands Avenue and the Project driveway. The truck percentages used in the noise model were 4.6% medium trucks and 22.9% heavy trucks. This truck mix is based on the Project trip truck percentages from Table 4.12-1 within Section 4.12, Transportation, of this Draft EIR.

The change in roadway noise levels was predicted for two conditions: existing, near-term, and horizon year 2035 plus Project. Traffic noise levels were calculated for roadway segments bounded by intersections within the Project area and are listed as follows:

- **Project Driveway** – From N. Woodside Avenue to the Project;
- **Wheatlands Avenue** – From N. Woodside Avenue to Wheatlands Road;
- **N. Woodside Avenue** – From Wheatlands Avenue to Woodside Avenue (combined north/south split);
- **Woodside Avenue** – From Magnolia Avenue to the Woodside Avenue north/south split;

- **Magnolia Avenue –** From Woodside Avenue to SR-52; and
- **SR-67** (project trip traffic was not available for this roadway).

Based upon the FICON thresholds presented in Section 4.10.2 above, an increase of less than 5 dBA when the ambient sound level is less than 60 dBA L_{dn}/CNEL, less than 3 dBA when the ambient sound level is between 60 and 65 dBA L_{dn}/CNEL, or less than 1.5 dBA when the ambient sound level is greater than 65 dBA L_{dn}/CNEL would not be significant. Utilizing the traffic noise modeling worksheets found in Appendix K, Table 4.10-7 shows that the highest predicted change in traffic noise level (the Project driveway) combined with the roadways surrounding the immediate Project site are predicted to experience an aggregate total traffic noise level of 84 dBA at 50 feet for the horizon year 2035 condition with a predicted increase of less than 1 dBA due to the Project contribution. Although the aggregate predicted "with Project" condition is greater than the City limit as summarized in Section 4.10.2, the predicted "without Project" level at the nearest sensitive receivers is also greater than the City limit, with a predicted "with Project" increase of less than 1 dBA, which is less than the FICON 1.5 dBA threshold when the ambient sound level is greater than 65 dBA L_{dn}/CNEL, and would be considered imperceptible to the average person. Additionally, although the increase in noise level for the Project driveway is greater than 5 dBA and therefore higher than the FICON thresholds and perceptible to the average person, there are no noise-sensitive receptors adjacent to the Project driveway; the nearest noise-sensitive receptors to the south of the Project are already dominated by much higher levels of traffic noise from nearby adjacent roadways such as SR-67, while noise-sensitive receptors to the north of the Project are occluded from the Project driveway by intervening buildings and terrain. Therefore, potential impacts at existing off-site noise-sensitive land uses along roadway segments identified in Table 4.10-7 and with respect to Project-generated changes to future traffic noise would be **less than significant**.

Table 4.10-7. Predicted Traffic Noise Levels

Modeled Roadway Segment	From	To	Existing (dBA CNEL)	Existing Plus Project (dBA CNEL)	Delta (dBA)	Near-Term (dBA CNEL)	Near-Term Plus Project (dBA CNEL)	Delta (dBA)	Horizon 2035 (dBA CNEL)	Horizon 2035 Plus Project (dBA CNEL)	Delta (dBA)
Project Driveway	N. Woodside Avenue	Project	50.38	61.62	11.24	50.38	61.62	11.24	50.38	61.62	11.24
Wheatlands Avenue	N. Woodside Avenue	Wheatlands Road	61.82	61.82	0.00	61.82	61.82	0.00	67.10	67.10	0.00
N. Woodside Avenue	Wheatlands Avenue	Woodside Avenue - Combined	67.76	69.05	1.29	68.46	69.58	1.12	73.19	73.33	0.14
Woodside Avenue	Magnolia Avenue	Woodside Avenue - Combined	77.4	77.60	0.20	77.50	77.70	0.20	78.70	78.75	0.05
Magnolia Avenue	Woodside Avenue	SR-52	77.15	77.27	0.12	77.34	77.46	0.12	77.72	77.76	0.04
SR-67			83.50	82.5	0.00	84.15	84.15	0.00	84.39	84.39	0.00
Aggregate Total @ 50 Feet			**85.29**	**85.39**	**0.10**	**85.79**	**85.87**	**0.09**	**86.38**	**86.41**	**0.03**
Project Driveway, Wheatlands Avenue, SR-67 Segment Aggregate Total @ 50 Feet			**83.64**	**83.71**	**0.06**	**84.29**	**84.35**	**0.05**	**84.78**	**84.81**	**0.03**

Source: Appendix K.

Project Sound Sources

On-site Outdoor Mechanical Equipment

The completion of the building will add a variety of noise-producing mechanical equipment that are presented and discussed in the following paragraphs. Most of the noise-producing equipment or sound sources would be considered stationary or limited in mobility to a defined area.

Methodology and Parameters

The aggregate noise emission from these outdoor-exposed sound sources has been calculated with the Datakustik CadnaA sound propagation program. CadnaA is a commercially available software program for the calculation, presentation, assessment, and prediction of environmental noise based on algorithms and reference data per International Organization of Standardization (ISO) Standard 9613-2, "Attenuation of Sound During Propagation Outdoors, Part 2: General Method of Calculation" (ISO 1996). The CadnaA computer software allows one to position sources of sound emission in a simulated 3D space having heights and footprints consistent with project architectural plans and elevations. In addition to the above-mentioned sound source inputs and building-block structures that define the three-dimensional sound propagation model space, the following assumptions and parameters are included in this CadnaA-supported stationary noise source assessment:

- Ground effect acoustical absorption coefficient equal to 0.5, which intends to represent an average or blending of ground covers that are characterized largely by hard reflective pavements and existing building surfaces across the project site and the surroundings;
- Reflection order of 1, which allows for a single reflection of sound paths on encountered structural surfaces such as the modeled building masses;
- Off-site residential structures and buildings have not been rendered in the model;
- An eight-foot-tall, 568-foot-long overlapped barrier was modeled on the northern perimeter of the project site (PDF-NOI-1);
- Calm meteorological conditions (i.e., no wind) with 68 degrees Fahrenheit and 50% relative humidity; and
- All of the modeled noise sources are operating concurrently and continuously for a minimum period of 1 hour.

Based on the available plans and other design information, the proposed Project building would be served by roof-mounted air-conditioning equipment that includes outdoor-exposed packaged air-handling units and air-cooled condensers that provide the expected cooling demand (expressed as refrigeration "tonnage") for a building. The following are descriptions of modeled sound sources, with Table 4.10-8 exhibiting modeled sound power level data at octave-band center frequency (OBCF) resolution. Detailed information supporting these summary descriptions and quantities appear in Appendix K.

Table 4.10-8. Modeled Sound Power Levels (PWL) for Stationary Sources (HVAC)

Building	Sound Source	Overall L_{eq} (dBA)	A-Weighted dB at Octave Band Center Frequency (OBCF, Hz)								
			32.5	63	125	250	500	1000	2000	4000	8000
1	Air Handling	93	74	74	86	87	88	85	78	72	67
	Air Conditioning	98	74	74	81	88	92	91	91	89	80

The HVAC reference sound levels were calculated from a combination of inputs that include square footage values for the proposed Project's proposed office spaces, Project applicant response to data requests, and manufacturer sound power level data. For the analysis of noise from HVAC equipment operation, eight air conditioning units were modeled on the roofs of the project building.

Other Stationary Noise Sources

The proposed Project building may feature other noise emitters, but their contributions would tend to be sporadic or otherwise occur infrequently and thus be expected to have no greater acoustic contribution to an hourly L_{eq} than the continuous-type HVAC noise studied herein.

Loading Dock Noise Sources

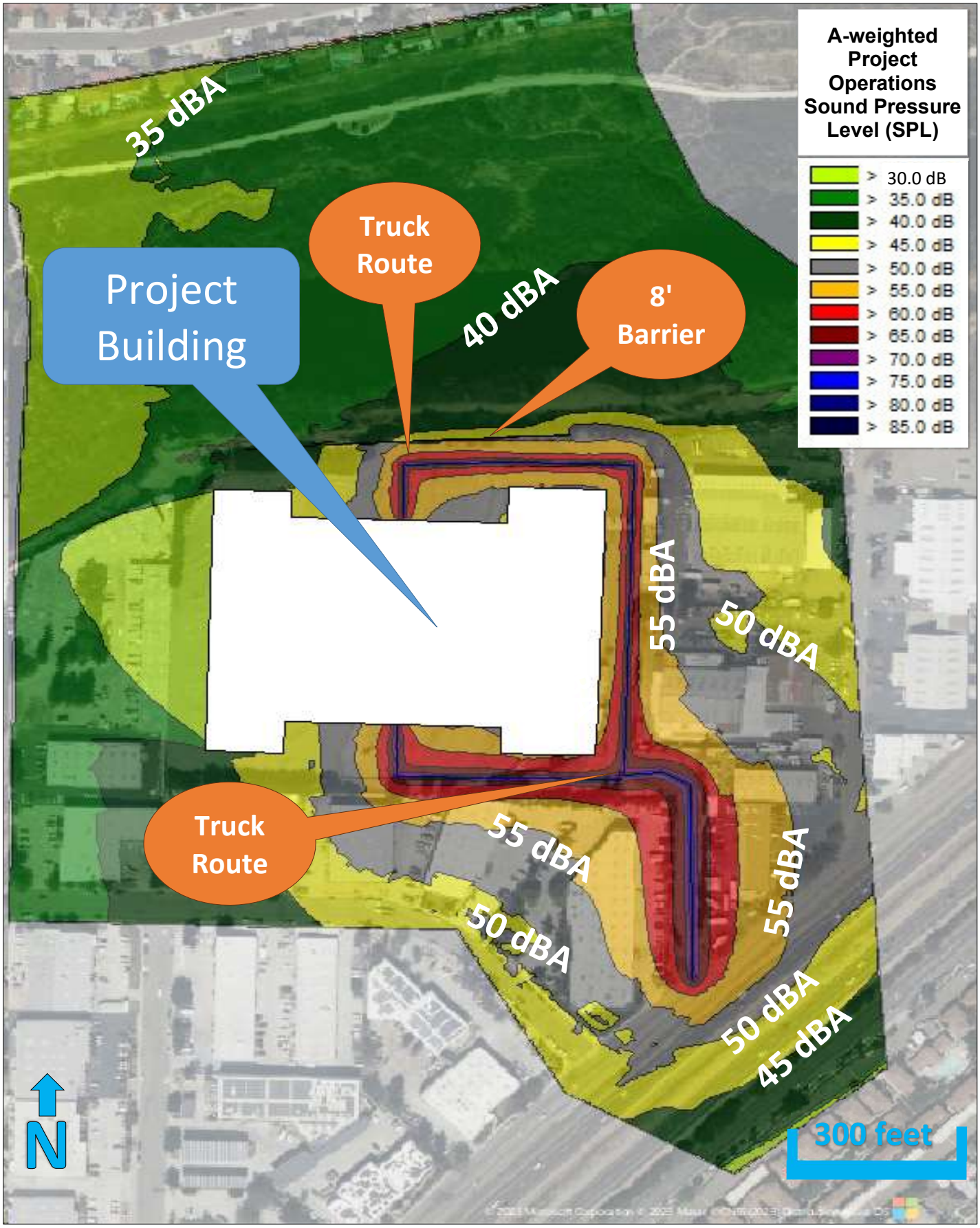
The proposed Project building also features loading dock areas for the loading and unloading of heavy trucks. Onsite loading dock noise was calculated for a single heavy truck pass by (Salter 2014) and extrapolated based upon the number of heavy trucks entering or exiting the facility during the peak hour. Backup alarms are also included in the truck noise level calculations. Loading dock data were subsequently entered into the CadnaA model for the prediction of stationary operations noise levels. Detailed information supporting the calculation of daytime and nighttime loading dock noise be found in Appendix K.

Modeling Results

An operational scenario of the proposed Project was modeled that assumes all the HVAC equipment is operating simultaneously for a minimum period of one hour along with peak hour truck movements in the loading dock areas. Figure 4.10-3, Predicted Daytime Onsite Operations Noise Contours, displays the predicted noise contours associated with aggregate sound propagation from operating HVAC and peak daytime loading dock sound sources. An additional operational scenario of the proposed Project was modeled to predict a hypothetical nighttime scenario, where all the HVAC equipment is operating simultaneously for a minimum period of one hour, but the peak hour truck movement is reduced to 25% of the peak for each docking area. Figure 4.10-4, Predicted Nighttime Onsite Operations Noise Contours, displays the predicted noise contours associated with aggregate sound propagation from operating HVAC and nighttime loading dock sound sources.

Figures 4.10-3 and 4.10-4 illustrate predicted aggregate SPL propagation solely from operation of the proposed Project stationary sound sources as described herein. The color-coded annular bands of SPL are calculated across a field parallel with and five (5) feet above local grade.

Based on the noise level contours appearing in Figures 4.10-3 and 4.10-4, the proposed Project is predicted to be up to 67 dBA L_{eq} in the daytime and 60 dBA L_{eq} in the nighttime for a calculated L_{dn} of 68 dBA at the adjacent industrial land uses and is therefore expected to be lower than and thus comply with the City's 75 dBA L_{dn} threshold for industrial land uses. Further, the proposed Project is predicted to be up to 40 dBA L_{eq} in the daytime and 35 dBA L_{eq} in the nighttime for a calculated L_{dn} of 43 dBA at the noise-sensitive receptors to the north of the Project site and up to 43 dBA L_{eq} in the daytime and 38 dBA L_{eq} in the nighttime for a calculated L_{dn} of 46 dBA at the noise-sensitive receptors to the south of the Project site, both of which are therefore predicted to be lower than and thus comply with the City's 65 dBA L_{dn} threshold for residential land uses. Throughout operation of the Project, all activities shall adhere to Sections 5.04-130 and 5.04.160 of the City's municipal code which limits nighttime noise.



SOURCE: Microsoft 2024; Dudek 2024

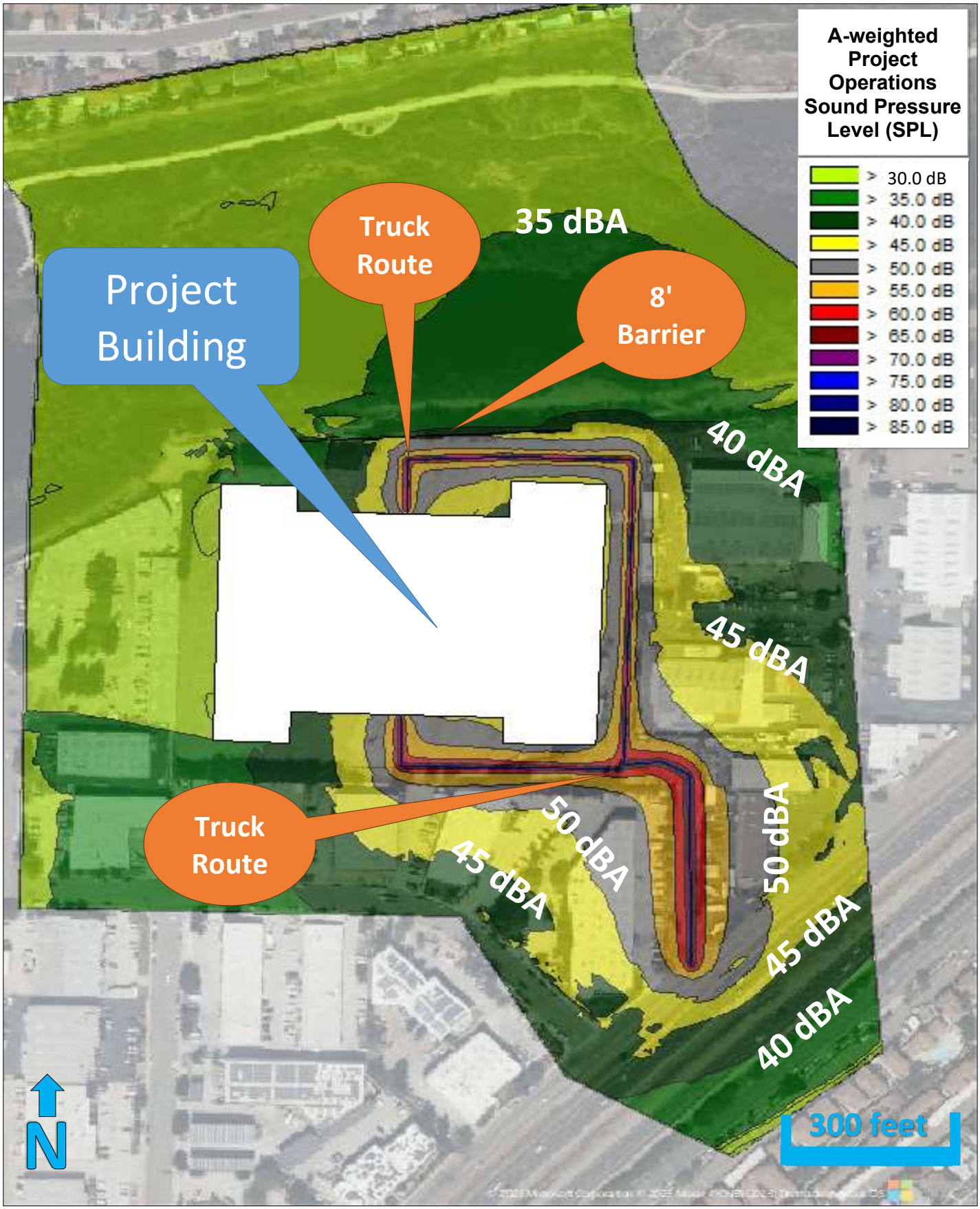
DUDEK

FIGURE 4.10-3

Predicted Daytime Onsite Operations Noise Contours (L_{eq})

Palisade Santee Commerce Center Project

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SOURCE: Microsoft 2024; Dudek 2024

DUDEK

FIGURE 4.10-4

Predicted Nighttime Onsite Operations Noise Contours (L_{eq})

Palisade Santee Commerce Center Project

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On-site Parking Activity

Less-than-Significant Impact. A comprehensive study of noise levels associated with surface parking lots was published in the Journal of Environmental Engineering and Landscape Management (Baltrënas et al. 2004). The study found that average noise levels for parking lots of similar size during the peak period of use of the parking lot (generally in the morning with arrival of commuters, and in the evening with the departure of commuters), was 47 dBA L_{eq} at 1 meter (3.28 feet) from the outside boundary of the parking lot. The parking areas would function as point sources for noise, which means that noise would attenuate at a rate of 6 dBA with each doubling of distance. Employee parking spaces are proposed to be distributed throughout the Project site adjacent to the warehouse/office building, no closer than 700 feet from the edge of the closest parking space to the nearest residences to the north. At a distance of 700 feet, parking space noise levels would not be audible to the human ear at the nearest residences. The combination of the parking space noise (<2 dBA L_{eq}) and the predicted stationary operation level (43 dBA L_{eq} at the nearest receptor) would be 43 dBA L_{eq}[1], which would be well below the applicable limits (i.e. 65 dBA L_{dn} for residential receptors). Therefore, impacts associated with parking noise would be **less than significant**.

B. Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Less-than-Significant Impact. Construction activities may expose persons to excessive groundborne vibration or groundborne noise, causing a potentially significant impact. Caltrans has collected groundborne vibration information related to construction activities (Caltrans 2020). Information from Caltrans indicates that continuous vibrations with a PPV of approximately 0.2 ips are considered annoying. For context, heavier pieces of construction equipment, such as a bulldozer that may be expected on the Project site, have peak particle velocities of approximately 0.089 ips or less at a reference distance of 25 feet.

Groundborne vibration attenuates rapidly, even over short distances. The attenuation of groundborne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in FTA and Caltrans guidance. By way of example, for a bulldozer operating on-site and as close as the northern Project boundary (i.e., 310 feet from the nearest occupied property), the estimated vibration velocity would be 0.0006 ips per the equation as follows (FTA 2018):

$$PPV_{rcvr} = PPV_{ref} * (25/D)^{1.5} = 0.002 = 0.089 * (25/310)^{1.5}$$

In the above equation, PPV_{rcvr} is the predicted vibration velocity at the receiver position, PPV_{ref} is the reference value at 25 feet from the vibration source (the bulldozer), and D is the actual horizontal distance to the receiver. Therefore, at this predicted PPV, the impact of vibration-induced annoyance to occupants of nearby existing homes would be **less than significant**.

Construction vibration, at sufficiently high levels, can also present a building damage risk. However, anticipated construction vibration associated with the proposed project would yield a maximum amplitude of 0.002 ips, which does not surpass the guidance limit of 0.2 to 0.3 ips PPV for preventing damage to residential structures (Caltrans 2020). Because the predicted vibration level at 310 feet is less than this guidance limit, the risk of vibration damage to nearby structures is considered **less than significant**.

[1] Because noise levels are summed in the energy (that is, the logarithmic) domain, a noise level that is 10 decibels or more lower than another noise level becomes negligible, because the sound energy from the higher noise source is completely dominant.

Once operational, the proposed Project would not be expected to feature major producers of groundborne vibration. Anticipated mechanical systems like heating, ventilation, and air-conditioning units are designed and manufactured to feature rotating (fans, motors) and reciprocating (compressors) components that are well-balanced with isolated vibration within or external to the equipment casings. On this basis, potential vibration impacts due to proposed Project operation would be **less than significant**.

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.

Less-than-Significant Impact. There are no private airstrips within the vicinity of the Project site. The closest airport to the proposed Project site is the Gillespie Field regional airport, approximately 1.5 miles west of the Project boundary. According to the Gillespie Field Community Relations Traffic Pattern Review Appendix C: Noise Analysis, the Project site falls outside the studied noise contours. Impacts would be **less than significant.**

4.10.5 Mitigation Measures and Level of Significance After Mitigation

All impacts related to noise and vibration would be less than significant. No mitigation is required.

4.11 Public Services

This section describes the existing public services conditions of the Palisade Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to the implementation of the Project.

4.11.1 Existing Conditions

Fire Protection and Emergency Medical Services

Fire prevention, suppression, inspection, rescue, and emergency medical services for the Project site and Santee are provided by the Santee Fire Department (SFD). In addition, the City contracts with San Diego County, State of California Master Mutual Aid Agreements, and California Department of Forestry and U.S. Forest Service (CAL FIRE) to provide a full range of fire protection services.

The Santee-Lakeside Emergency Medical Services Authority (SLEMSA) is a Joint Exercise of Powers Agreement between the City of Santee, a California charter city and municipal corporation, and Lakeside Fire Protection District (City of Santee 2023). If needed, fire stations within the Lakeside Fire Protection District may respond to emergency calls in Santee. Numerous other local, state, and federal agencies are available to assist the SFD as needed, depending on the type of incident. Emergency response in every jurisdiction in the State of California is handled in accordance with the Statewide Emergency Management System (SEMS) that requires the City to routinely update its emergency operations plan to maintain compliance (City of Santee 2003).

Effective fire response and suppression relies on the ability to meet peak load water supply and pressure. The City requires all new development to install adequate water conveyance facilities to meet this requirement to ensure adequate fire suppression capabilities. The City is served by the Padre Dam Municipal Water District (PDMWD) who is able to provide water services to the proposed Project and existing customers in the City (City of Santee 2023).

As listed in Table 4.11-1, the SFD operates two fire stations within the City, with the closest being Station No. 4 (8950 Cottonwood Avenue), located approximately 1.5 miles northwest of the Project site (City of Santee 2023). Station No. 4 operates one battalion chief's vehicle and four response units: one fire engine, one fire truck, one brush engine, and one paramedic ambulance. In addition, the station houses two reserve fire engines and two reserve ambulances. Daily staffing consists of a minimum of nine personnel including two captains, two engineers, four firefighter-paramedics, and one battalion chief.

Table 4.11-1. Fire Stations in City of Santee

Fire Station No.	Address	Distance to Project Site (approx.)
Station No. 4	8950 Cottonwood Avenue	1.5 miles
Station No. 5	9130 Carlton Oaks Drive	4.6 miles

Note: See Figure 4.11-1, Fire Stations in the City of Santee. Distances were calculated using roadway miles.

SFD has achieved a Class 1 Public Protection Classification rating, or Insurance Services Office Rating. In 2019, the City's Fire and Life Safety Department documented 5,791 total incidents (City of Santee 2022). According to the City's General Plan SFD aims to provide an average maximum initial response time of no more than 6 minutes for fire, rescue and emergency medical services with an average maximum response time of no more than 10

minutes for supporting paramedic transport units, 90 percent of the time (City of Santee 2003). The average SFD response times (from unit notification until unit arrives on scene, averaged) for emergency and non-emergency calls are 6 minutes and 18 seconds for fire and explosions; 5 minutes and 43 seconds for rescue and emergency medical; and 6 minutes and 40 seconds for service and non-emergency calls (City of Santee 2022).

Police Protection

The City is patrolled by the Santee Sheriff which is under the San Diego County Sheriff's Department. The Santee Sheriff serves a population of approximately 59,000 people in the area of 16- square miles. The Santee Sheriff Station is located at 8811 Cuyamaca Street, approximately 2.1-miles southwest of the Project site (SDCSD 2024).

In 2023, the Santee Sheriff received 13,837 calls for service (SDCSD 2023). Generally, the Santee Sheriff has quicker response times to emergency calls than the County average. The average priority call response time for general crimes within the City is 8.2 minutes and the average for traffic law is 7.5 minutes.

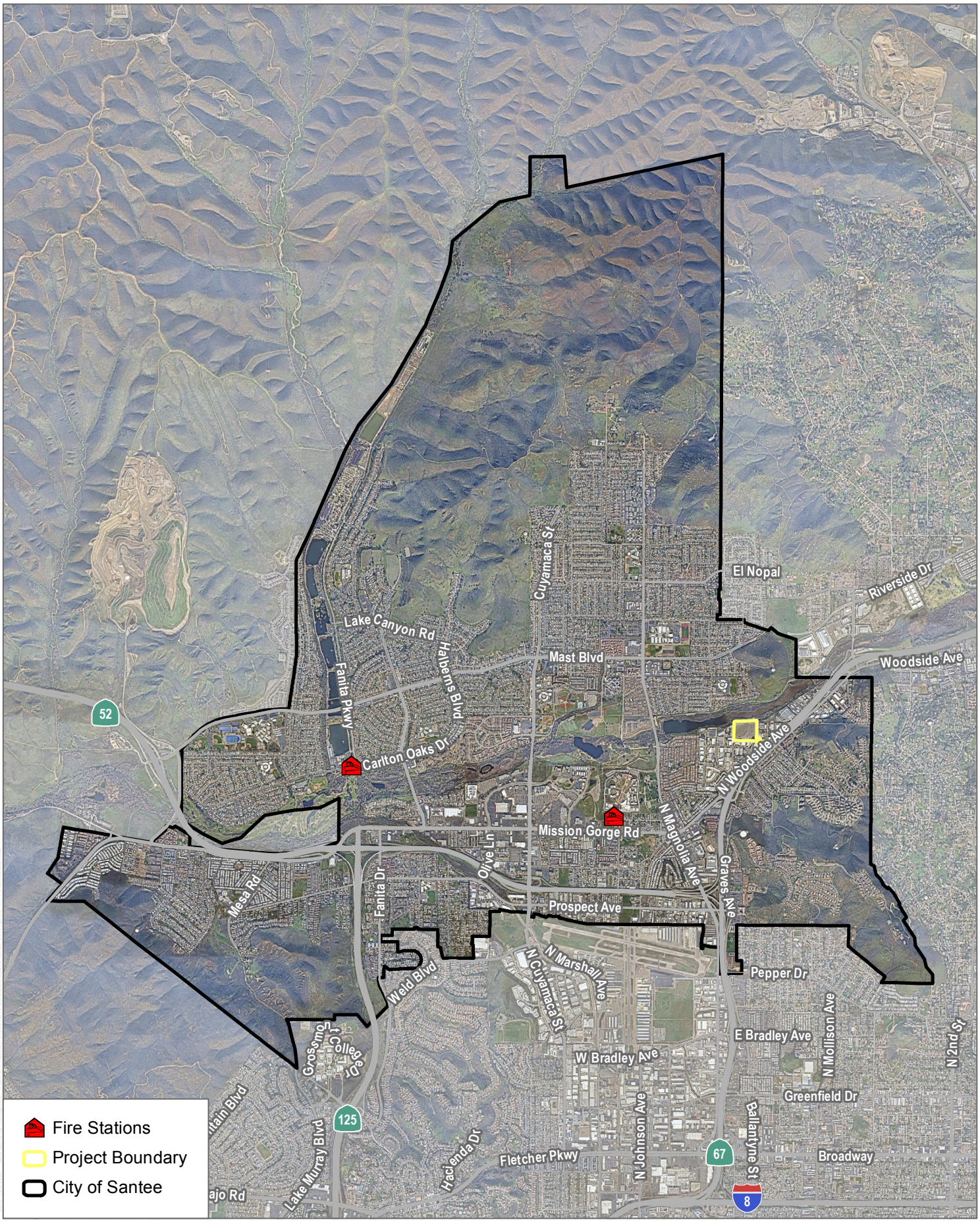
With over 60 employees, the Santee Sheriff provides a full range of law enforcement services including patrol, traffic, investigations, parking enforcement, emergency services, crime prevention programs, crime analysis, and narcotics enforcement (SDCSD 2024). The Patrol Division is under the command of the Patrol Captain and is responsible for responding to all calls for service within the community. This task is accomplished by having a centralized location answering point for all 911 calls as well as all non-emergency sheriff department calls. The Traffic Division is responsible for enforcing vehicle codes, as well as traffic control as well as handling most accidents. The California Highway Patrol is responsible for traffic enforcement in the unincorporated areas. The Detective's Division is responsible for investigating theft cases, physical assaults (excluding homicides), sexual assaults, vandalism, burglaries, annoying phone calls, and other crimes. The Crime Prevention Division provide the Santee Station with information and presentations regarding safety and crime preventions. In addition, the Community Oriented Policing and Problem Solving (COPPS) / School Resources Officers, including the Senior Volunteers Division are responsible for the investigating the quality-of-life issues within the community (SDCSD 2024).

Schools

There are two school districts that provide public education throughout the City, the Santee School District (SSD) for kindergarten through 8th grades and the Grossmont Union High School District (GUHSD) for 9th through 12th grades. Nearby there are two higher education facilities, which are San Diego State University and Grossmont Community College. The Project site is located within the boundary of the SSD and the GUHSD (SSD 2023; GUHSD 2024). The school closest to the Project is Hill Creek School, which serves sixth grade through eighth-grade students and is located approximately 0.22-miles northwest of the Project site (SSD 2023).

Parks

The City of Santee Parks and Recreation Department has ten park facilities within the City that are available to the residents. These include Mast, Woodglen Vista, Shadow Hill, Town Center Community Park- East, Town Center Community Park – West, Sky Ranch, Big Rock, Deputy Ken Collier Neighborhood, Weston, and West Hills parks. The City parks also includes the Santee Sportsplex USA, a field complex that hosts regional and national sports tournaments such as softball, baseball, and soccer. Of these, Shadow Hill Park (9161 Shadow Hill Road) is the closest park to the Project site which is located approximately 1.1 miles south of the Project site. Most City parks consist of picnic shelters, a playground area, walking paths, grass area, restrooms, and ample parking spaces (City of Santee 2023).



SOURCE: SANGIS 2022

DUDEK

0 1,400 2,800 Feet

FIGURE 4.11-1

Fire Stations in the City of Santee

Palisade Santee Commerce Center Project

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Other Public Facilities

Libraries

The San Diego County Library System serves all of the San Diego County and the City of Santee. The closest library branch to the Project is the Santee Public Library located at 9225 Carlton Hills Blvd #107 (San Diego County Library System), approximately 3.1 miles west of the Project site.

4.11.2 Relevant Plans, Policies, and Ordinances

The following regulatory framework discussion focuses on state and local regulations because there are no relevant public services-related federal laws.

State

California Occupational Safety and Health Administration

In accordance with California Code of Regulations Title 8 Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Equipment", the California Occupational Safety and Health Administration (Cal/OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance and use of all firefighting and emergency medical equipment.

California Fire Code

California Code of Regulations (CCR), Title 24, Part 9, incorporates adoption of the 2015 International Fire Code of the International Code Council with necessary California amendments. The California Fire Code and Office of the State Fire Marshal provides regulations and guidance for local agencies in the development and enforcement of fire safety standards. The California Fire Code also establishes minimum requirements that would provide a reasonable degree of safety from fire, panic, and explosion. The California Fire Code applies to construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure within the State of California. The California Fire Code includes a mandate for automatic sprinkler systems in new buildings and structures, including floors of buildings where the fire area exceeds 5,000 square feet, has an occupant load of 100 or more, or is located on a floor other than the level of exit discharge[1] (Cal. Code Regs. tit. 24 Part 9). Part 2 of Title 24 of the CCR refers to the California Building Code, which contains complete regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 was updated in 2019 to reflect changes in the base document from the Uniform Building Code to the International Building Code.

California Government Code 66000

According to California Government Code 66000, a qualified agency, such as a local school district, may impose fees on developers to compensate for the impact that the project will have on existing facilities or services. The State of California legislature passed SB 50 in 1998 that inserted new language into the Government Code

[1] Exit discharge refers to the part of the exit route that leads directly outside.

(Sections 65995.5-65995.7), which authorized school districts to impose fees on developers of new residential construction in excess of mitigation fees authorized by Government Code 66000. School districts must meet a list of specific criteria, including the completion and annual update of School Facility Needs Analysis, in order to be legally able to impose the additional fees.

Local

The following local regulations pertaining to public services would apply to the Project.

City of Santee General Plan

Public services are protected through policies in the City's General Plan Land Use, Conservation, and Safety Elements. The goals and policies in the City's General Plan for public services applicable to the Project are provided below. The General Plan contains additional goals and policies that are more general in nature and not specific to development such as the Project. Therefore, they are not listed below, but as stated in Chapter 2, *Introduction*, all goals and policies in the City's General Plan are incorporated by reference.

Land Use Element

Objective 3.0 Provide and maintain the highest level of service possible for all community public services and facilities.

Policy 3.1 The City should ensure that land divisions and developments are approved within the City only when a project's improvements, dedications, fees and other revenues to the City and other agencies fully cover the project's incremental costs to the City and other agencies. These costs are for providing new or upgraded capital improvements and other public facilities and equipment resulting from, and attributable to the project, which are necessary to protect and promote the public's health, safety and welfare and to implement feasible mitigation measures. Such facilities include, but are not limited to: parks, bridges, major roads, traffic signals, street lights, drainage systems, sewers, water, flood control, fire, police, schools, hiking/bicycle trails and other related facilities. In calculating benefits of land divisions and developments, the City may consider other public objectives and goals including social, economic (job creation, secondary economic benefits, etc.) and environmental factors.

Safety Element

Objective-4.0 Minimize injuries, loss of life and property damage resulting from fire hazards.

Policy 4.1 Proposed development should be approved only after it is determined that there will be adequate water pressure to maintain the required fire flow at the time of development.

Policy 4.2 The City should ensure that all new development meets established response time standards for fire and life safety services.

Policy 4.8 Encourage and support the delivery of a high level of emergency services through cooperation with other agencies and use of available financial opportunities.

Policy4.10 Encourage the continued development, implementation, and public awareness of fire prevention programs.

Policy4.11 Police and Fire Department Review In order to minimize fire hazards, the Santee Fire and Life Safety Department shall routinely be involved in the review of development applications. Considerations shall be given to adequate emergency access, driveway widths, turning radii, fire hydrant locations and needed fire flow requirements.

Policy 4.12 The timing of additional fire station construction or renovation, or new services shall relate to the rise of service demand in the City and surrounding areas.

Policy 4.13 Support mutual aid agreements and communications links with County and the other municipalities participating in the Unified San Diego County Emergency Service Organization.

Objective 5.0 Minimize injuries, loss of life and property damage and losses from criminal activities.

Policy 5.4 The City shall involve law enforcement personnel in the review of new development applications through participation in the development review process.

Policy 5.5 All structures shall be adequately identified by street address and be lighted sufficiently to deter criminal activity.

City of Santee Municipal Code

Chapter 11.18 of the Santee Municipal Code adopts the 2019 California Fire Code, Part 9, Title 24, of the California Code of Regulations. The code includes but is not limited to regulations requiring all new development to install sprinkler systems; the minimum required unobstructed street widths for fire apparatus access; and requirements, which include preparation of a fire protection plan, for development in wildland-urban interface areas.

Chapter 12.30 (Development Impact Fee) of the Municipal Code imposes development fees on all new projects and is collected at the time of issuance of building permits by the City. The charges imposed by this regulation serves as a means to finance fire, police, library, parks and other services. As such, the proposed Project would be required to comply with this regulation.

4.11.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to public services and recreation are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact would occur if the Project would:

A. 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:
   a. Fire protection.
   b. Police protection.

c. Schools.
d. Parks.
e. Other public facilities.

4.11.4 Impacts Analysis

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

i. Fire protection?

Less-than-Significant Impact. Fire protection requirements are based on the number of residents and workers in the SFD service areas. Service demand is primarily tied to population, not building size, because emergency medical calls typically make up the majority of responses provided by the SFD. As the number of residents and workers increases, so does the number of emergency medical calls. The proposed Project is a light industrial development. Therefore, employees would occupy the Project site full-time during Project operation and there would be an increase in demand for fire protection services.

Service demands during Project construction activities could increase. However, the presence of construction workers on site would be temporary and would cease after construction of the Project is complete. It would therefore not substantially increase the service demand for fire protection services in the City.

In addition, the proposed Project would be designed and constructed in accordance with all applicable provisions of the California Fire Code, which includes requirements for adequate fire flows, width of emergency access routes, turning radii for equipment, automatic sprinkler systems, fire alarms, and floor to sky height limits along emergency access routes. As part of the standard development practices, Project plans would be reviewed by the City and Fire Department, prior to construction. Compliance with fire code standards would reduce the potential demand for fire services by decreasing the likelihood and/or severity of a fire emergency at the site.

As previously discussed, the nearest fire station to the Project site is Fire Station No. 4 (8950 Cottonwood Avenue), located approximately 1.5 miles northwest. The SFD's response times vary within the City, with the current goal being able to provide an average maximum initial response time of no more than six minutes, with an average maximum response time of no more than ten minutes for supporting paramedic transport units 90% of the time (City of Santee 2003). In the event that Fire Station No. 4 could not meet the immediate needs of a call for services independently or does not have capability to address the full extent of a larger incident, the second closest station, Fire Station No. 5, is located approximately 4.6 miles from the Project site or other fire stations within the Santee-Lakeside joint exercise of powers agreement as well as the County's mutual aid agreement, as well as CAL FIRE, could respond or provide support (City of Santee 2023).

The proposed Project would be subject to the payment of a Development Impact Fees (DIF), per Chapter 12.30 (Development Impact Fees) of the City's Municipal Code. This fee would be used for future facility improvements necessary to ensure that the development contributes its fair share of the cost of facilities and equipment determined to be necessary to adequately accommodate new development in the City. The DIF amount is determined through evaluation of the need for new public service facilities as it relates to the level of service

demanded by new development, which varies in proportion to specific land uses. A portion of the DIF would be used exclusively toward fire protection services.

In addition, the Safety Element of the General Plan contains several policies to ensure adequate fire protection is maintained. Policy 4.2 requires that all new development meets established response time standards for fire and life safety services, and Policy 4.12 requires the timing of additional fire station construction or renovation, or new services to be related to the rise of service demands. Policy 4.1 further states that proposed developments should be approved only after it is determined that there will be adequate water pressure to maintain the required fire flow at the time of development. Similarly, in effort to minimize fire hazards, Policy 4.11 allows for the SFD to be routinely involved in the review of development applications. The policy states that consideration shall be given to adequate emergency access, driveway widths, turning radii, fire hydrant locations and needed fire flow requirements. The proposed Project would be subject to all General Plan policies states herein, including SFD review of the Project's development application.

Therefore, because the Project would be located within the SFD's response area, with nearby services of Fire Station No. 5, as well as fire stations in neighboring jurisdictions, the Project would be served by sufficient fire protection services, and it is not anticipated that the Project would hinder the SFD from meeting its response time targets. Furthermore, required payment of DIFs would ensure the Project contributes its fair share towards future facility improvements and equipment. The revenues and taxes generated from Project development would contribute to funding for facilities and services that have been identified by the SFD as needed for services in the future. Because the Project would not be anticipated to result in an increase to the City's population and required payment of DIFs would ensure the Project contributes its fair share towards SFD facility improvements and equipment, the Project would not result in the need for new or expanded fire protection facilities, and impacts would be **less than significant**.

ii. Police protection?

Less-than-Significant Impact. As described above in Section 4.11.1, Existing Conditions, police protection services are provided by the Santee Sheriff. The Santee Sheriff's station is located at 8811 Cuyamaca Street, approximately 2.1 miles southwest of the Project site.

The Project site is located near the San Diego River and is surrounded by industrial development. The City has a low crime rate and the Project site is unlikely to attract attention that would make the Project susceptible to crime (SDCSD 2023).

Construction activities may temporarily increase traffic volumes along N. Woodside Avenue and other nearby roadways during the construction period. The added traffic associated with workers commuting to the Project site, haul routes, deliveries, and other Project-related activities may increase the need for law enforcement services during construction activities. During construction, it is anticipated temporary security measures including security fencing and lighting would be installed to deter criminal activity. However, construction would be temporary and would not have a significant adverse effect on the SDCSD's ability to service the site.

As discussed in Chapter 5, Effects Found Not To Be Significant, the generation of 185 jobs would not significantly increase the population of the City or surrounding areas. While the Project would potentially result in a slight, incremental increase in calls to the SDCSD for service to the Project site in comparison to the existing conditions, this increase is expected to be nominal and would not result in the need for new SDCSD facilities. In addition, the Project site is already located within SDCSD's service area and would not require an expansion of service area, which could otherwise result in longer response time. Overall, it is anticipated that the Project would be adequately

served by existing SDCSD facilities, equipment, and personnel. Nonetheless, similar to other development projects in the City, the Project applicant would still be required to pay their fair share of development impact fees to help offset incremental impacts to police protection services. Therefore, impacts associated with SDCSD facilities and response times would be less than significant.

Additionally, the proposed Project would be consistent with or would not hinder implementation of the City General Plan goals and policies pertaining to police protection services listed in Section 4.11.1, Existing Conditions. The project would comply with Safety Element Policy 4.2, which requires that all new development meet established response time standards for fire and life safety services, as well as Policy 5.4 which requires the involvement of law enforcement personnel in the review of new development applications through participation in the Development Review process. The proposed Project is not anticipated to adversely affect service ratios or response times for police services such that new or expanded police facilities would be required. Therefore, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, or the need for new or physically altered police facilities; impacts would be **less than significant**.

iii. Schools?

No Impact. The Project site is located within the SSD and the GUHSD (SSD 2023; GUHSD 2024). However, it is not anticipated that implementation of the Project would result in the relocation of a significant number of people to the City, and an increase in school-age children requiring public education is not expected to occur as a result of the Project (see Chapter 5, Effects Found Not To Be Significant). Nonetheless, all residential and non-residential development projects are subject to SB 50, which requires payment of mandatory impact fees to offset any impact to school services or facilities. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other state or local laws (Government Code Section 65996). In accordance with SB 50, the project applicant would pay its fair share of impacts fees based on the number/type of dwelling units. These impact fees are required of most residential, commercial, and industrial development projects in the City. Therefore, **no impacts** associated with school facilities would occur.

iv. Parks?

No Impact. Given the nominal population growth that may result from Project implementation, neither construction nor operation of the Project would generate new residents to the extent that new or expanded park facilities would be required. Therefore, **no impacts** associated with park facilities would occur.

v. Other public facilities?

No Impact. The Project would not directly or indirectly induce substantial population growth in the City. As such, it is unlikely that the Project would increase the use of other public facilities such as libraries. Therefore, **no impacts** associated with libraries and other public facilities would occur.

4.11.5 Mitigation Measures and Level of Significance After Mitigation

All impacts related to public services and recreation would be less than significant. No mitigation is required.

4.12 Transportation

This section describes the existing transportation conditions of the Palisade Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential transportation impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to implementation of the Project.

In addition to the documents incorporated by reference (see Section 2.7, Documents Incorporated by Reference, of Chapter 2, Introduction, of this EIR), the following analysis is based, in part, on the following sources:

- *Transportation Impact Study,* prepared by Dudek in March 2025 (Appendix L)
- Other sources consulted are listed in Section 4.12.6, References.

4.12.1 Existing Conditions

Regional access to the Project site would be provided by SR-52 and SR-67. Local access to the Project site would be provided by Magnolia Avenue and Mission Gorge Road-Woodside Avenue. Both of these roadways are designated truck routes within the City.

Roadways

Characteristics of the adjacent existing street system roadways within the study area are described below.

Woodside Avenue

Woodside Avenue is an east-west roadway from Magnolia Avenue (where Mission Gorge Road ends) to Chestnut Street in Lakeside. Between Magnolia Avenue and SR-67 southbound-off ramp-Woodside Avenue intersection, Woodside Avenue is a Major Arterial, with four lanes and a center-two-way-left-turn lane (TWLTL). There are Class II bike lanes are provided on both sides of Woodside Avenue. The posted speed limit is 45 miles per hour (MPH).

Woodside Avenue splits into N. Woodside Avenue and Woodside Avenue east of the intersection with the SR-67 southbound off-ramp with N. Woodside Avenue paralleling SR-67 on the north side and Woodside Avenue paralleling SR-67 on the south side. N. Woodside Avenue is the segment between SR-67 southbound off-ramp-Woodside Avenue intersection to Riverford Road in the Lakeside community of San Diego County, and is designated as a Collector Road with a TWLTL. It is currently constructed with one lane in each direction with a center TWLTL and dedicated left-turn lanes at its intersections with Harley Road and Wheatlands Avenue. North of Wheatlands Avenue, the roadway is one lane in each direction without a TWLTL or dedicated left-turn lanes at intersections. There are Class II bike lanes on both sides of the N. Woodside Avenue. On-street parking is permitted along north side of N. Woodside Avenue. There are intermittent sidewalks along the roadway. The posted speed limit in the vicinity of the Project is 40 MPH.

Magnolia Avenue

Magnolia Avenue is a north-south roadway. It is classified as a Major Arterial north of Mission Gorge Road and Prime Arterial from Mission Gorge Road to Prospect Avenue. On-street parking is not permitted along the roadway from Mission Gorge Road to Prospect Avenue. There is paved sidewalk along Magnolia Avenue. The posted speed limit along the roadway is 45 MPH.

Existing Public Transit Services

The San Diego Metropolitan Transit System (MTS) provides public transportation throughout Santee and northern San Diego County. Figure 4.12-1 illustrates the transit facilities in the vicinity of the proposed Project. The nearest MTS bus routes serving the Project are described below.

- Route 832 runs clockwise from Santee Town Center to northern Santee and back to Santee Town Center via Cuyamaca Street, and Magnolia Avenue. The route operates between 6:17am and 6:56pm on weekdays, with 30-minute headways, and between 8:25am and 4:45pm on weekends with 60-minute headways. The nearest bus stop is located west of the Magnolia Avenue and Mission Gorge Road – Woodside Avenue intersection, approximately 0.90 miles from the Project site.
- Route 833 runs from the Santee Transit Center to the El Cajon Transit Center, via Mission Gorge Road, Magnolia Avenue, and Graves Avenue. The route operates between 5:52am and 6:12pm on weekdays, with 45-minute headways, and between 8:53am and 5:10pm on weekends, with 60-minute headways. The nearest bus stop is located west of Magnolia Avenue and Mission Gorge Road – Woodside Avenue intersection, approximately 0.90 miles from the Project site.
- Route 834 runs in a loop, connecting the Santee Transit Center to the West Hills Parkway area, via Prospect Avenue and Carlton Oaks. The route operates only on weekdays from 6:33am to 3:30pm with 60-minuite headways. The nearest bus stop to the Project site is approximately 2 miles away.

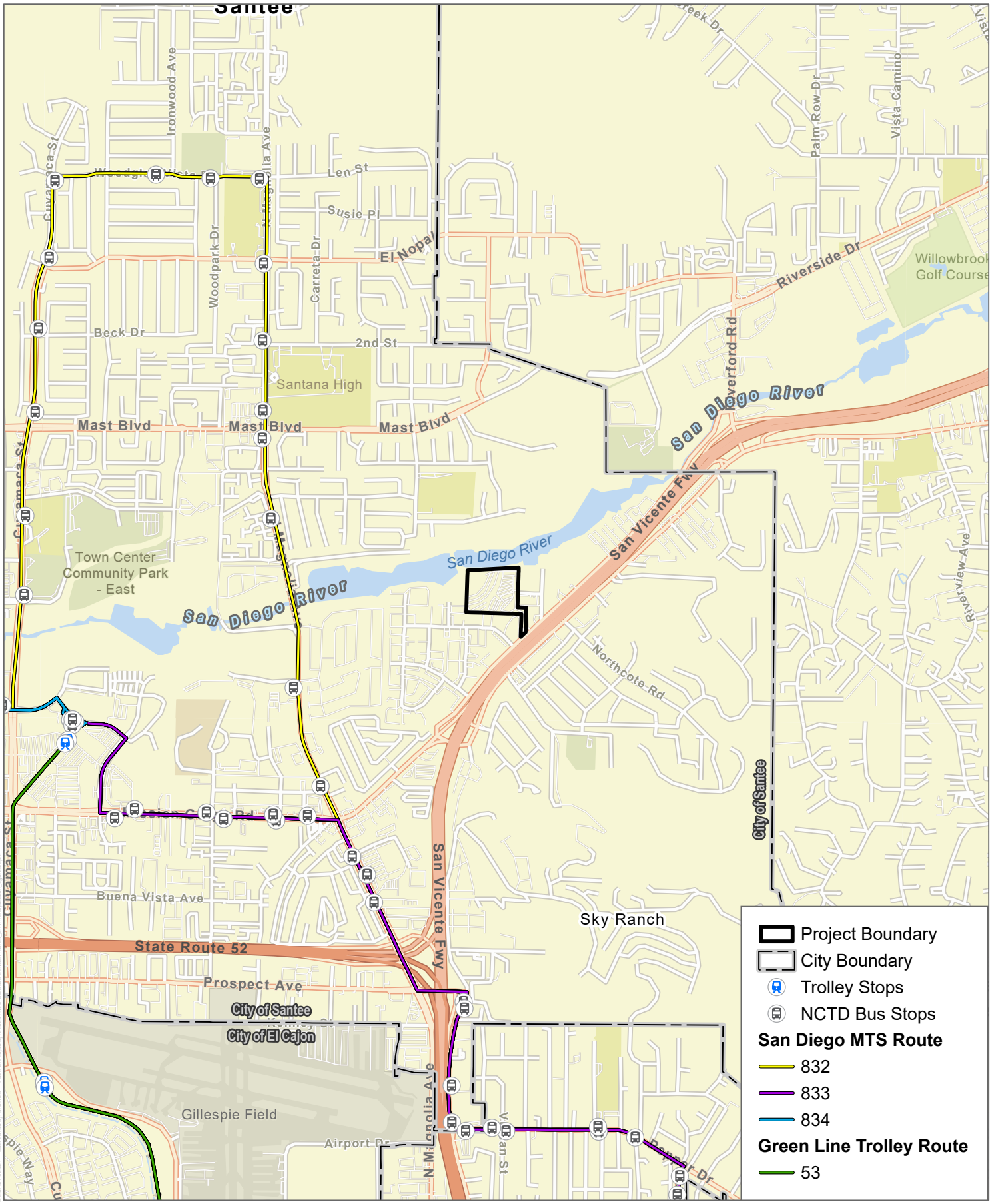
The City of Santee is served by the Green Line Trolley (Route 530), with the sole station within the City located at the Santee Transit Center. The Green Line connects Santee to the larger San Diego region and provides service into Downtown San Diego. The route operates from 5:00am to 1:00am with 15-minute headways on weekdays, and 30-minute headways on weekends. MTS ACCESS provides complementary, on-demand paratransit service to fulfill the unmet needs of residents such as seniors and persons with disabilities.

Existing Pedestrian and Bicycle Facilities

The General Plan Circulation Element identifies the following bicycle facility classifications, as defined by Caltrans:

- **Class I Bikeway (Bike Path)** provide a completely separated right-of-way designated for the exclusive use of bicycles and pedestrians with crossflows by motor vehicles minimized.
- **Class II Bikeway (Bike Lane)** provides a striped lane designed for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited, but with pedestrian and motor vehicle crossflows permitted.
- **Class III Bikeway (Bike Route)** provides shared use of traffic lanes with cyclists and motor vehicles, identified by signage and street marking such as sharrows.
- **Class IV Bikeway (Cycle Track)** are separated bikeways that provide right-of-way designated exclusively for bicycle travel within the roadway and physically protected from vehicular traffic.

A Class II Bike Lane runs along Woodside Avenue; the bike lane along Woodside Avenue connects to bike route along Shadow Hill Road and Northcote Road, however, it does not connect to any other bicycle facility in the City. The Planned Bicycle Network in the Mobility Element is based on Active Santee Plan (2021). It recommends Class II bike lanes along Mission Gorge Road between Riverview Parkway and Magnolia Avenue and along Magnolia Avenue between Mast Boulevard and Mission Gorge Road. Figure 4.12-2 illustrates the existing and proposed bike facilities near the Project.



SOURCE: SanGIS 2019; Open Street Maps; SanGIS 2023

FIGURE 4.12-1

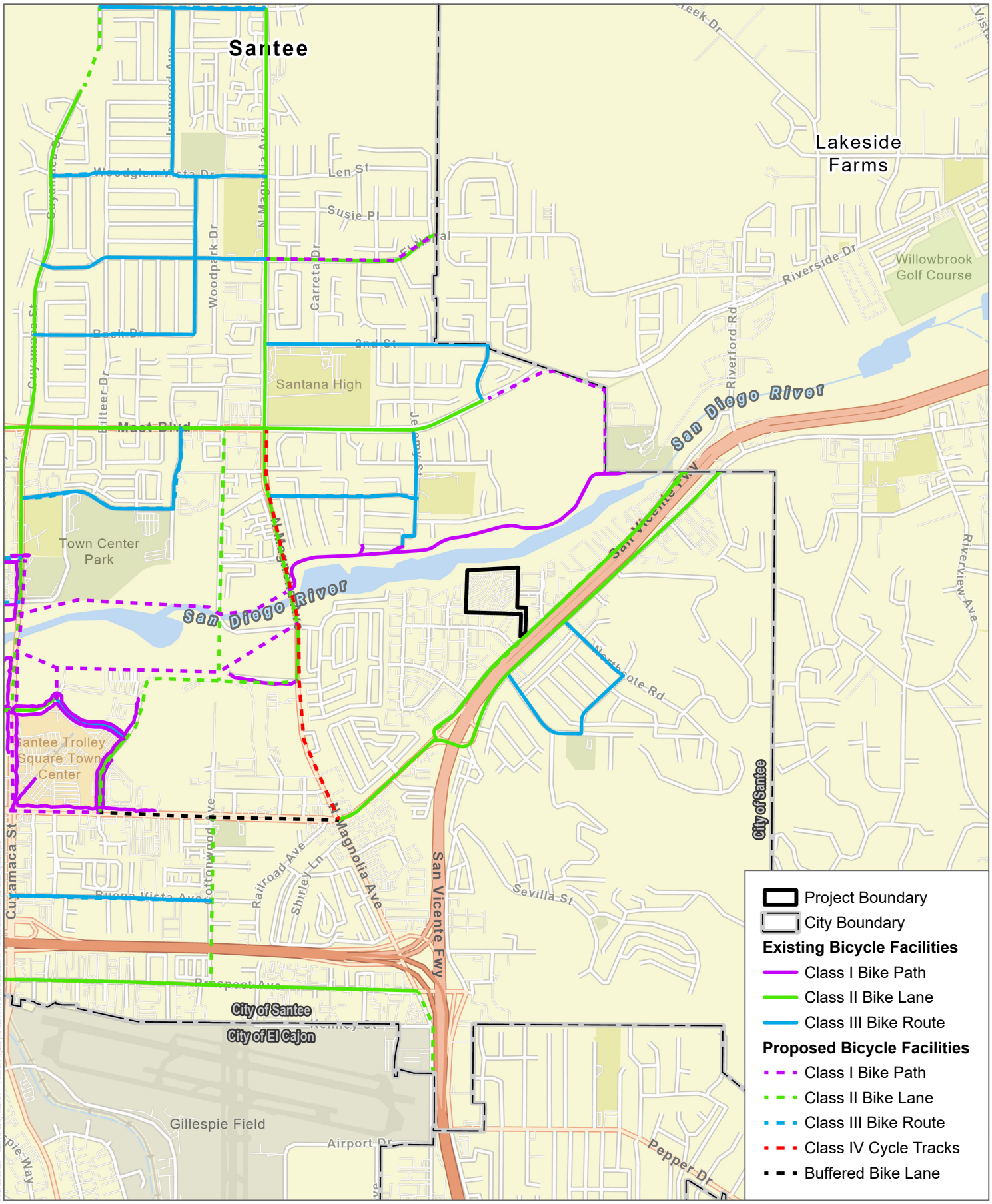
Transit Facilities

Palisade Santee Commerce Center Project

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SOURCE: SanGIS 2019; Open Street Maps; SanGIS 2023; City of Santee 2017

DUDEK

0 500 1,000 Feet

FIGURE 4.12-2

Bike Facilities

Palisade Santee Commerce Center Project

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Sidewalks and pedestrian facilities are provided along one side of Woodside Avenue, and adjacent roadways within one-half mile of the Project site. While pedestrian facilities such are crosswalks are missing within the immediate Project area, the Santee Active Transportation Plan has identified this area as in need and is committed to improve the area by installing missing segments of sidewalks, adding pedestrian ramps and crosswalks, and relocating utility facilities as needed.

4.12.2 Relevant Plans, Policies, and Ordinances

State

California Department of Transportation

Caltrans is the primary state agency responsible for the state transportation system. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for roadway traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities but may influence traffic flow and Level of Service (LOS) at such facilities, Caltrans may recommend measures to mitigate the traffic impacts.

Caltrans Transportation Impact Study Guide, May 20, 2020, provides that Caltrans' primary review focus is Vehicle Miles Traveled (VMT), replacing LOS as the metric used in CEQA transportation analyses (Caltrans 2020). Caltrans recommends use of OPR's recommended thresholds and guidance on methods of VMT assessment found in OPR's Technical Advisory (OPR 2018) for land use projects. In addition to VMT, the 2020 Transportation Impact Study Guide states that it may request a targeted operational and safety analysis to address a specific geometric or operational issue related to the state highway system and connections with the state highway system.

Assembly Bill 1358 – California Complete Streets Act of 2008

The California Complete Streets Act of 2008 (Assembly Bill 1358) requires circulation elements as of January 1, 2011 to accommodate the transportation system from a multi-modal perspective, including public transit, walking and biking, which have traditionally been marginalized in comparison to autos in contemporary American urban planning.

Senate Bill 743, California Environmental Quality Act Guidelines Update

In December 2018, the California Natural Resources Agency certified and adopted the CEQA Guidelines update package, including Guidelines Section 15063.4, which implements SB 743. SB 743 required new metrics for analyzing transportation impacts under CEQA to provide an alternative to LOS. Measurements of transportation impacts may include VMT, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. In most cases, a project's effect on automobile delay will no longer constitute a significant environmental impact.[1]

The justification for this paradigm shift is that when significant impacts are identified under LOS and delay-based analyses, the mitigation is often to provide road improvements, which increase roadway capacity that inherently accommodates more vehicular traffic, resulting in additional greenhouse gas emissions. By contrast, under a VMT-

[1] SB 743 also amends congestion management law to allow cities and counties to opt out of LOS standards within certain infill areas (OPR 2018).

based analysis, mitigation typically takes the form of strategies to reduce rather than accommodate traffic, thereby reducing vehicle emissions. Lead agencies were required to transition to the guidelines and establish VMT thresholds for transportation impacts no later than July 1, 2020. The City of Santee adopted its VMT Guidelines on April 27, 2022.

Local

SANDAG's San Diego Forward: The Regional Plan

SANDAG's San Diego Forward: The Regional Plan (Regional Plan) combines the region's two most important existing planning documents—the Regional Comprehensive Plan and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Regional Comprehensive Plan, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas, including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the Regional Plan.

The SANDAG Board of Directors adopted the 2021 Regional Plan on December 10, 2021. The 2021 Regional Plan is a 30-year plan that considers growth, movement, and residential location around the region. The 2021 Regional Plan combines the RTP/SCS and Regional Comprehensive Plan. As such, the 2021 Regional Plan must comply with specific state and federal mandates. These include an SCS, per California SB 375, that achieves greenhouse gas emissions reduction targets set by the California Air Resources Board, compliance with federal civil rights requirements (Title VI); environmental justice considerations; air quality conformity; and public participation (SANDAG 2021).

Congestion Management Program

The 2008 Congestion Management Program for San Diego County was developed to meet the requirements of Section 65089 of the California Government Code. Since that time, the local agencies within San Diego County elected to opt out of the Congestion Management Program requirements, as allowed within the Government Code. As such, there are no Congestion Management Program-specific requirements associated with this Project. However, to ensure the region's continued compliance with the federal congestion management process, SANDAG has prepared The Regional Plan in compliance with Federal requirements to prepare a Regional Transportation Plan. The Regional Plan incorporates performance monitoring and measurement of the regional transportation system, multimodal alternatives to single-occupancy vehicles, land use impact analysis, congestion management tools, and Integration with the Regional Transportation Improvement Program process.

City of Santee General Plan Mobility Element

The goal of the mobility element is to create a balanced, interconnected multimodal transportation network that allows for the efficient and safe movement of all people and goods, and that supports the current and future needs of Santee community members and travel generated by planned land uses. The following are applicable objectives and goals stated in the Mobility Element:

Objective 1.0 Ensure that the existing and future transportation system is accessible, safe, reliable, efficient, integrated, convenient, well-connected and multimodal. The system will accommodate active transportation, and accommodate people of all ages and abilities, including pedestrians, disabled,

bicyclists, users of mass transit, motorists, emergency responders, freight providers and adjacent land uses.

Policy 1.3 The City shall ensure that the entire right-of-way is designed to accommodate appropriate modes of transportation.

Objective 2.0 Develop an efficient, safe and multi-modal transportation network, consisting of local roads, collectors, arterials, freeways and transit services, in a manner that promotes the health and mobility of Santee residents and that meets future circulation needs, provides access to all sectors of the City, and supports established and planned land uses.

Policy 2.1 The City shall encourage an automobile Level of Service "D" on street segments and at intersections throughout the circulation network while also maintaining or improving the effectiveness of the non-automotive components of the circulation system (i.e. pedestrians, bicyclists, and public transit), especially in the Town Center area. The City may approve a lower automobile Level of Service if it finds that the effectiveness of non-automotive components of the circulation system would be maintained or improved as a result. In other cases, the City shall not approve any development that causes a drop in the level of service at a street segment or an intersection to LOS "E" or "F", after feasible mitigation, without overriding social, economic, or other benefits.

Policy 2.3 The City shall establish minimum design standards for streets, which include grade, widths, alignment and public improvement requirements in a City design manual.

Policy 2.4 The City shall manage the existing truck route network for use by City serving heavy commercial and industrial traffic to provide for a safe circulation system for all drivers.

Policy 2.5 The City should not allow city streets to be used for through-City truck traffic.

Policy 2.6 The City should encourage traffic circulation improvements such as, but not limited to, enhanced roadway markings, synchronized traffic signals, and Intelligent Transportation System (ITS) network management.

Policy 2.7 The City should coordinate with Caltrans, SANDAG, MTS, and other responsible agencies to identify, plan, and implement needed transportation improvements.

Objective 3.0 Upgrade and maintain Santee transportation corridors to meet the safety needs of all roadway users – including youth and elderly and travelers of varying physical abilities – and to provide a well-connected system throughout the City.

Policy 3.1 The City shall encourage the development of improved signalization and intersection design while taking into consideration the safety of all modes.

Policy 3.2 The City should encourage the utilization of traffic control devices, such as center medians and/or left-turn pockets where appropriate and that do not conflict with safety, and discourage the installation of median cuts where traffic safety cannot be assured.

Policy 3.3 The City shall ensure that newly constructed roadways are designed to permit rapid access for emergency vehicles.

Policy 3.4 The City shall provide adequate traffic control devices throughout the City to ensure safe and efficient mobility.

Policy 3.5: The City shall encourage the use of innovative methods for traffic control (such as roundabouts, curb extensions, and traffic circles) where appropriate that add character, slow vehicle speeds, and create opportunity for improved aesthetics while effectively managing traffic.

Objective 4.0 Maximize the utilization of site planning techniques to improve traffic safety.

Policy 4.3 The City shall promote design standards that allow for safe and efficient transport, delivery, loading and unloading of goods from service vehicles within commercial and industrial areas.

Policy 4.5 The City should establish and implement appropriate setback and off-street parking requirements.

Objective 7.0 Develop, maintain, and support a safe, comprehensive and integrated bikeway system that encourages bicycling, as documented in the City's Bicycle Master Plan (BMP)

Policy 7.4 The City should require new development and redevelopment to provide connections to existing and proposed bicycle routes, where appropriate.

Objective 8.0 Develop and maintain an accessible, safe, complete, and convenient pedestrian system that encourages walking.

Policy 8.1 The City should require the incorporation of pedestrian-friendly design concepts where feasible including separated sidewalks and bikeways, landscaped parkways, traffic calming measures, safe intersection designs and access to transit facilities and services into both public and private developments.

Policy 8.2 The City should provide for the connectivity of wide, well-lit sidewalks and environments with safety buffers between pedestrians and vehicular traffic, where feasible.

Policy 8.4 The City shall require non-contiguous sidewalks on all streets with a residential collector classification or higher, as appropriate.

Policy 8.6 The City should promote walking and improve the pedestrian experience by requiring pedestrian facilities along all classified streets designated on the Circulation Plan; by implementing streetscape improvements along pedestrian routes that incorporate such elements as shade trees, street furniture, and lighting; by orienting development towards the street; by employing traffic calming measures; and by enforcing vehicle speeds on both residential and arterial streets.

Policy 8.8 The City should improve pedestrian safety at intersections and mid-block crossings, where appropriate.

Objective 9.0 Increased use of alternative modes of travel to reduce peak hour vehicular trips, save energy, and improve air quality.

Policy 9.1 The City shall encourage and provide for Ride Sharing, Park 'n Ride, and other similar commuter programs that eliminate vehicles from freeways and arterials.

Policy 9.2 The City should encourage businesses to provide flexible work schedules for employees.

Policy 9.3 The City should encourage employers to offer shared commute programs and/or incentives for employees to use transit.

Policy 9.4 The City should encourage the use of alternative transportation modes, such as walking, cycling and public transit. The City should maintain and implement the policies and recommendations of the Bicycle Master Plan and Safe Routes to School Plan to improve safe bicycle and pedestrian access to major destinations.

4.12.3 Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to transportation are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to transportation would occur if the Project would:

A. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
B. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
C. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
D. Result in inadequate emergency access.

Methodology

In December 2018, the CEQA Guidelines were updated to include a threshold for evaluating traffic impacts using a VMT methodology. This new methodology was required to be used statewide beginning on July 1, 2020. This section summarizes the methodologies used to perform the VMT analysis. The methodologies described are consistent with OPR and City of Santee VMT Analysis Guidelines (April 13, 2022), Guidelines for Transportation Impact Studies in the San Diego Region (May 2019) and the City of Santee Mobility Element (October 2017).

Project Trip Generation

Trip generation represents the amount of traffic that is attracted and produced by a development and is based upon the specific land uses planned for a given project. Based on driveway traffic counts conducted and trip generation observed at three similar industrial land use site, (see Appendix A of Appendix L of this EIR), the City approved the use of the ITE trip generation rate for the Industrial Park use (ITE Code 130) to estimate the Project's daily, AM peak hour, and PM peak hour trip generation. The ITE daily trip rate (3.37 trips/TSF) is higher than the first site (Site 1) which had the highest surveyed empirical rate (3.15 trips/TSF). Additionally, to provide a conservative estimate of truck trips, the warehouse truck fleet mix from the South Coast Air Quality Management District's (SCAQMD) Warehouse Truck Trip Study Data Results and Usage (2014) was used to estimate Project-related truck traffic. Based on the SCAQMD data, passenger cars would account for 72.5% trips of the total trips generated by a warehouse facility, and truck trips would account for approximately 27.5% of the total trips. The ITE and SCAQMD trip generation data are widely used for other industrial projects in southern California.

The total percentage of truck trips were further divided by 2-axle, 3-axle, and 4+ axle trucks per the SCAQMD study. These truck trips generated by the Project are provided in passenger car equivalence (PCE) trips by using appropriate PCE factors. PCE factors consistent with the standard practice were used to estimate the total PCE trips for the Project.

Using the trip rate for an Industrial Park contained in the ITE Trip Generation Manual, the Project's daily, AM peak hour, and PM peak hour trips were estimated. As shown in Table 4.12-1, the proposed Project would generate approximately 1,011 daily non-PCE trips, 102 AM peak hour trips (83 inbound and 19 outbound), and 103 PM peak hour trips (23 inbound and 80 outbound). Adjusting for PCE, the proposed Project would generate approximately 1,440 daily PCE trips, 148 AM PCE peak hour trips (121 inbound and 27 outbound), and 146 PM PCE peak hour trips (30 inbound and 116 outbound).

Table 4.12-1. Project Trip Generation Summary

Land Use	Daily Trip Rate/Unit		AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Rates and Trip Generation								
Industrial Park[1]	3.37 trips/TSF		0.28	0.06	0.34	0.07	0.27	0.34
Land Use	**Units**	**Daily**						
Project (300.145 TSF)	**Total Trips (non-PCE)**	**1,011**	**83**	**19**	**102**	**23**	**80**	**103**
	Passenger Cars	*733*	*60*	*14*	*74*	*16*	*58*	*74*
	Trucks (non-PCE)	**278**	**24**	**5**	**29**	**6**	**23**	**29**
Trip Generation (Non-PCE)								
Vehicle Mix[2]	Passenger Cars (72.5%)	733	60	14	74	16	58	74
	2-axle Trucks (4.6%)	46	4	1	5	1	4	5
	3-axle Trucks (5.7%)	58	5	1	6	1	5	6
	4+axle Trucks (17.2%)	174	15	3	18	4	14	18
	Non - PCE Trips	**1,011**	**83**	**19**	**102**	**23**	**80**	**103**
Trip Generation (PCE)								
PCE Factor[3] and PCE Trips	Passenger Cars (72.5%)	733	60	14	74	16	58	74
	2-axle Trucks (4.6%)	70	6	1	7	1	6	7
	3-axle Trucks (5.7%)	115	10	2	12	2	10	12
	4+axle Trucks (17.2%)	522	45	9	54	11	42	53
	PCE Trips	**1,440**	**121**	**27**	**148**	**30**	**116**	**146**

Notes: TSF = thousand square feet, PCE = passenger car equivalent Some of the totals may not match exactly due to rounding.

1 Trip rates from the ITE.

2 Vehicle Mix from the SCAQMD 2014

3 Passenger Car Equivalent (PCE) factors are assumed to be 1.0 for passenger vehicles, 1.5 for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4-axle trucks.

Project Trip Distribution and Assignment

Project trip distribution percentages are based on logical travel paths to and from the Project site, review of traffic studies conducted for nearby projects, and consideration of the traffic distribution patterns in the area. Figure 4.12-3 illustrates the proposed Project trip distribution. As shown in the figure, approximately 80% of the passenger cars would travel west and 20% would travel east along Woodside Avenue from the Project site. A

majority of Project-related trucks (approximately 90%) would travel west on Woodside Avenue to access the SR-52 ramps from Magnolia Avenue. The remaining, 10% of the Project trucks would travel east on Woodside Avenue.

Based on the distribution percentage, Figures 4.12-4, 4.12-5, and 4.12-6 illustrate the Project trip assignment for cars, trucks, and total trips (in PCE), respectively.

Vehicle Miles Traveled Analysis Methodology

On September 27, 2013, SB 743 was signed into law, which creates a process to change the way that transportation impacts are analyzed under CEQA. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Under the new transportation guidelines, LOS, or vehicle delay, will no longer be considered an environmental impact under CEQA. The updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. These guidelines identify VMT as the most appropriate measure of transportation impacts under CEQA and were required to be implemented on July 1, 2020.

The requirements to prepare a detailed transportation VMT analysis apply to all discretionary land development projects that are not exempt from CEQA, except those that meet at least one of the transportation screening criteria. A project that meets at least one of the screening criteria below would be presumed to have a less than significant VMT impact due to project characteristics and/or location.

Per the City's VMT Analysis Guidelines, for projects that do not screen out VMT should include analysis using the SANDAG Regional Travel Demand Model. The model outputs can be used to produce VMT/capita, VMT/employee, and Total VMT. For employment projects (Industrial/Non-industrial), the City's VMT guidelines the following criteria:

- **For projects that generate fewer than 2,400 daily unadjusted driveway trips:** Identify the location of the project on the City's VMT/employee map. The project's VMT/employee will be considered the same as the VMT/capita of the TAZ as shown on the VMT/employee map. Compare the project's VMT/employee to the threshold to determine if the impact is significant, or, if desired or requested by the City, input the project into the SANDAG Regional Travel Demand Model to determine the project's VMT/employee.
- **For projects that generate 2,400 or greater daily unadjusted driveway trips:** Larger projects will typically be analyzed using a custom model run by inputting the project into the SANDAG Regional Travel Demand Model. To perform the analysis, all project land uses should be inputted, and the VMT/employee should be determined using the same method/scripts that SANDAG utilizes to calculate the VMT/employee threshold. There may be some circumstances where the use of screening maps or other sketch modeling tools are appropriate for larger projects, especially if the project has the same characteristics of the land uses that are already contained in the TAZ where the project is located or if the project is unique in nature and project specific travel behavior information is available.

As shown in above with Table 4.12-1, the Project would generate less than 2,400 daily trips. As shown above, the proposed Project would not meet any VMT screening criteria, therefore, the Project's VMT evaluation has been conducted using the SANDAG SB 743 VMT maps.

4.12.4 Impacts Analysis

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

Less than Significant Impact. The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, as discussed below.

SANDAG's San Diego Forward: The Regional Plan

The Project would be consistent with the 2021 Regional Plan (RP)/Sustainable Communities Strategy (SCS) as analyzed in Table 4.9-2, Consistency with 2021 RP/SCS Goals, in Section 4.9, Land Use and Planning.

City of Santee Mobility Element

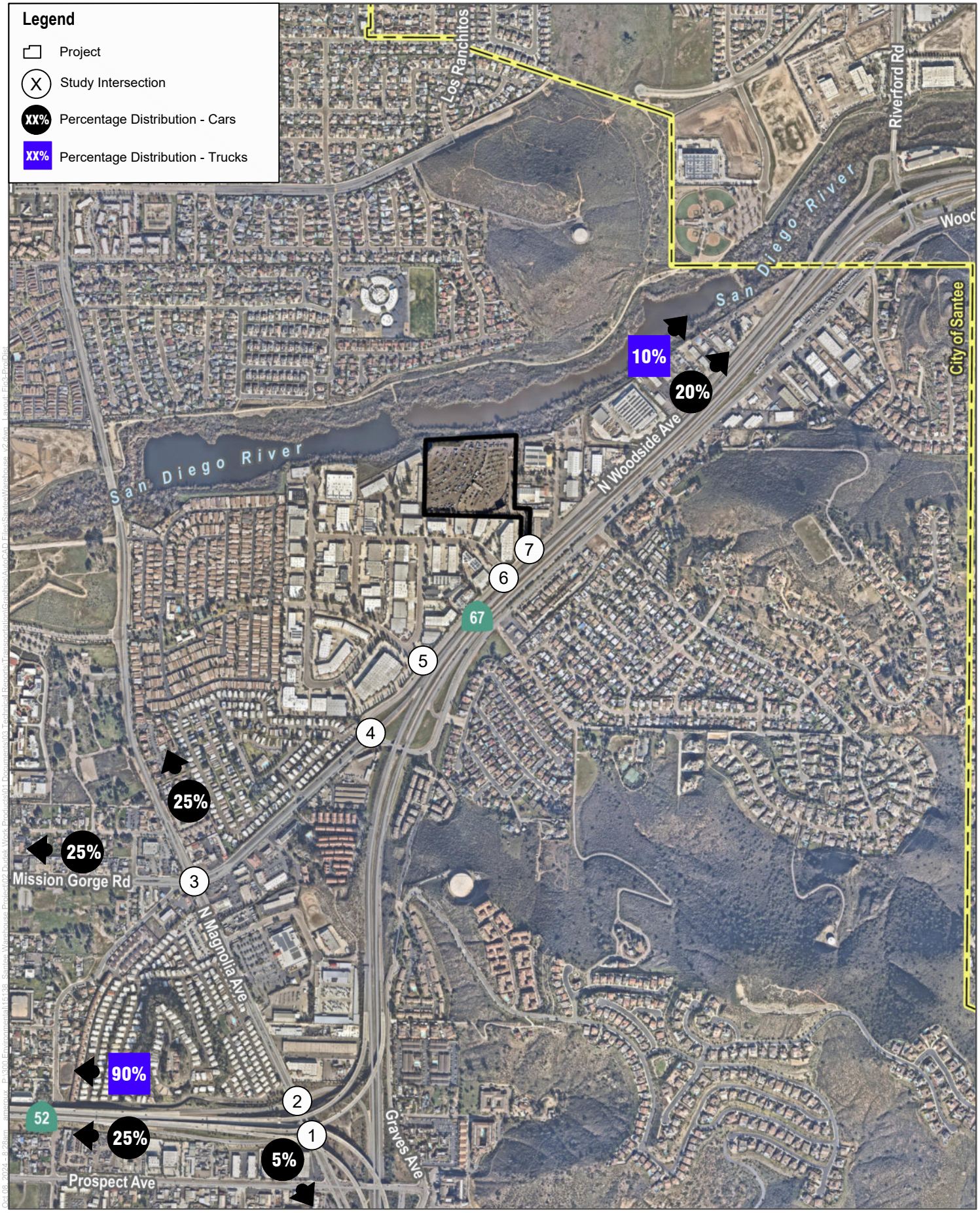
The General Plan Mobility Element outlines the City's goals and implementation policies to provide a safe and efficient transportation system strategy. These goals and implementation policies are provided in detail in Section 4.12.2, Relevant Plans, Policies, and Policies.

Project generated traffic would travel along arterials and major roadways to access the site and cut through traffic on residential streets is not anticipated. The truck traffic from the Project would primarily travel along truck routes to access SR-52. The Project would also include improvements along N. Woodside Avenue, including frontage landscape and pedestrian improvements.

The Project would construct a dedicated eastbound left turn lane at the Project Access Driveway along N. Woodside Avenue and parking would be provided entirely on site. Although the roadway segment of N. Woodside Avenue near Project Driveway is forecast to operate at unacceptable LOS, with the frontage and Project access improvements, the operation of the Project Access Driveway/N. Woodside Avenue would facilitate traffic flow and truck turn movement along Woodside Avenue near the Project site. Since the roadway segment is constructed at buildout classification per the City's Mobility Element, no further improvements to this roadway segment are recommended. Therefore, the Project would not conflict with relevant policies in the City's Mobility Element.

A Transportation Impact Study (TIS) was prepared to evaluate the Project's effects on the LOS on transportation facilities in the Project area, including seven intersections and four roadway segments. LOS has been addressed herein for informational purposes only and can no longer be used to determine significant transportation impacts under CEQA as directed by SB 743. The detailed results of the LOS Analysis are provided in Appendix L of this EIR.

Additionally, the applicant has prepared a detailed memorandum (Appendix L of the TIS included as Appendix L of this EIR) describing consistency of the improvements proposed by the Project, with the City's Mobility Element goals and policies



SOURCE: SanGIS, Open Street Maps

DUDEK

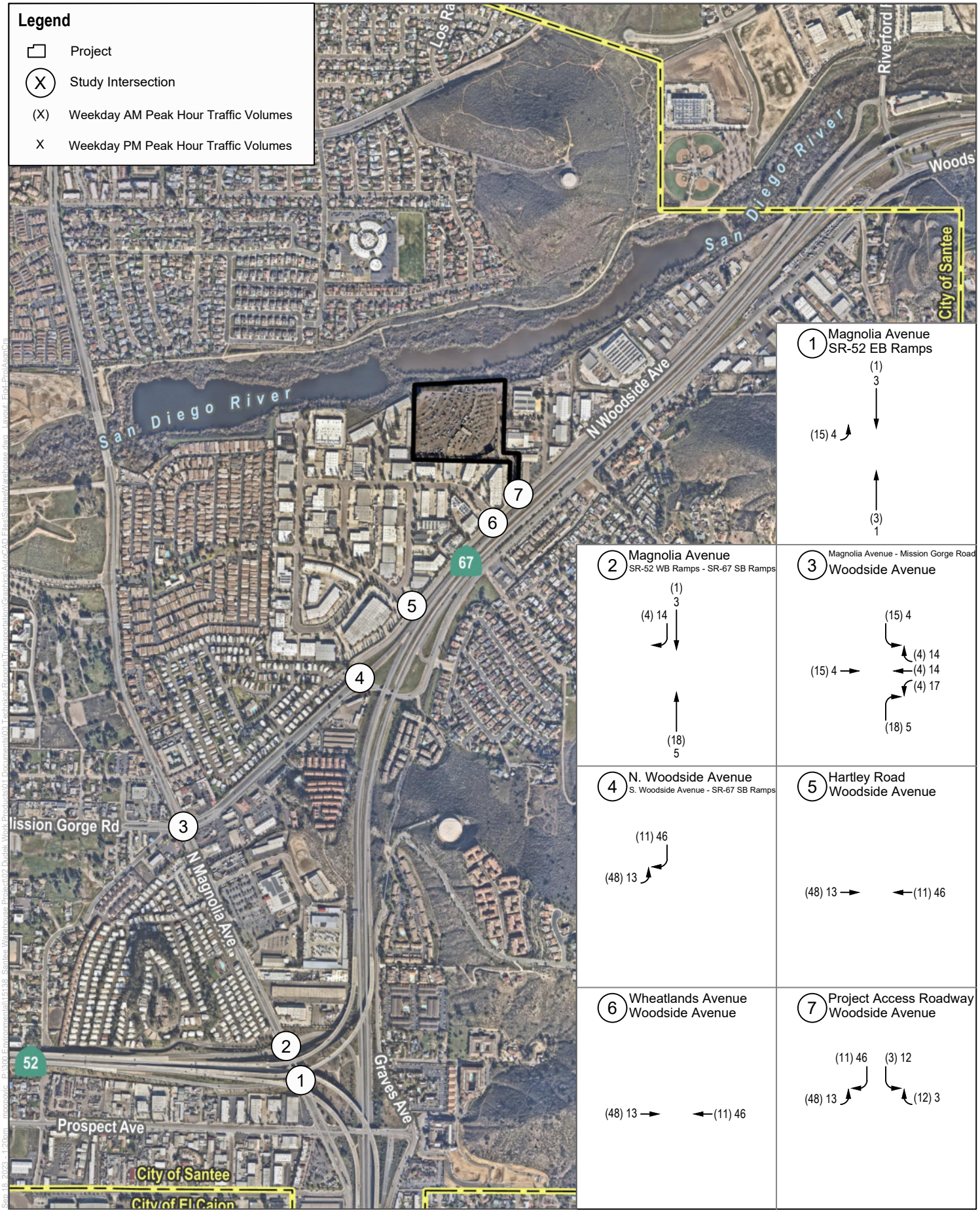
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FIGURE 4.12-**3**

Project Trip Distribution

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps

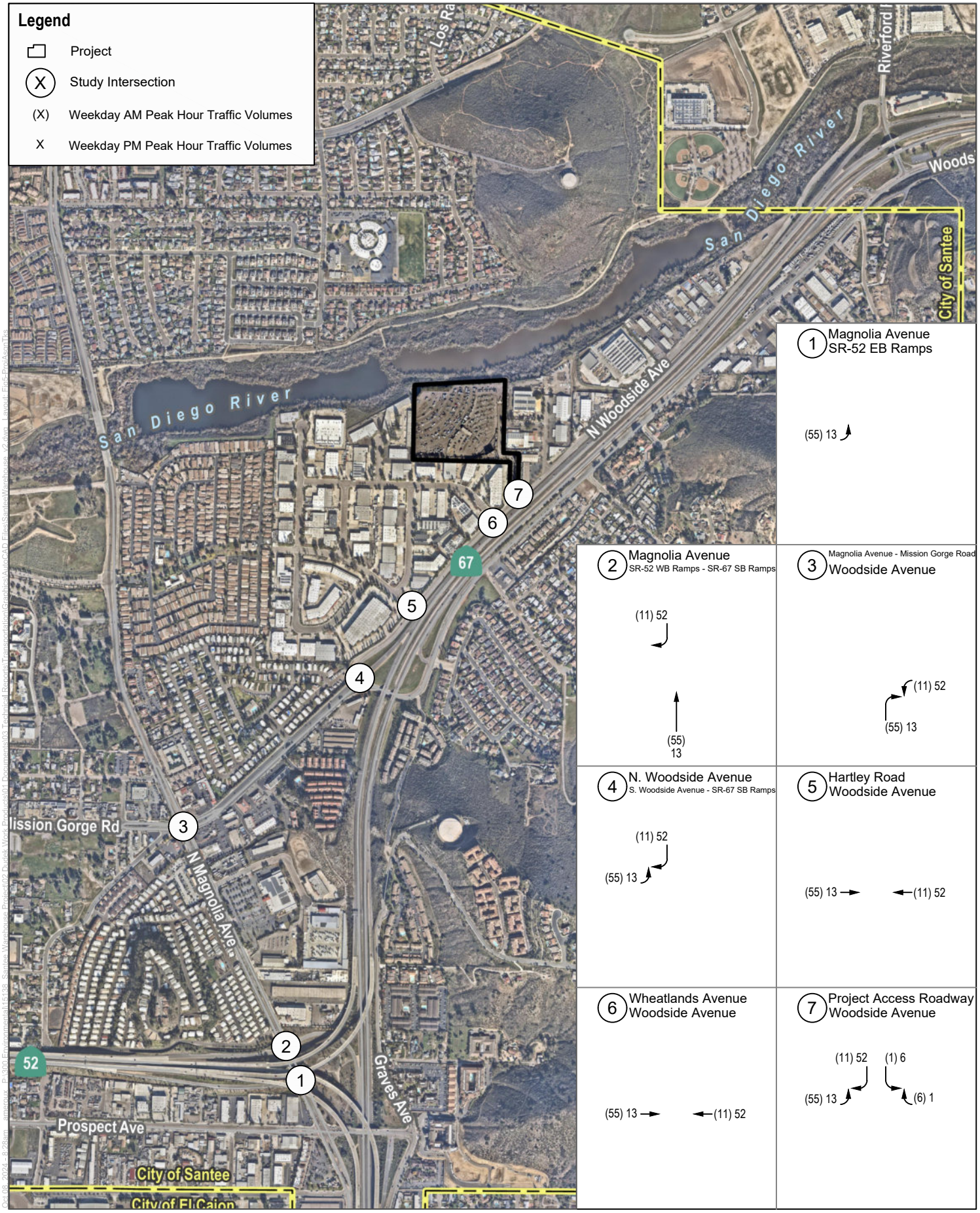
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FIGURE 4.12-4

Project Trip Assignment (Cars)

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps

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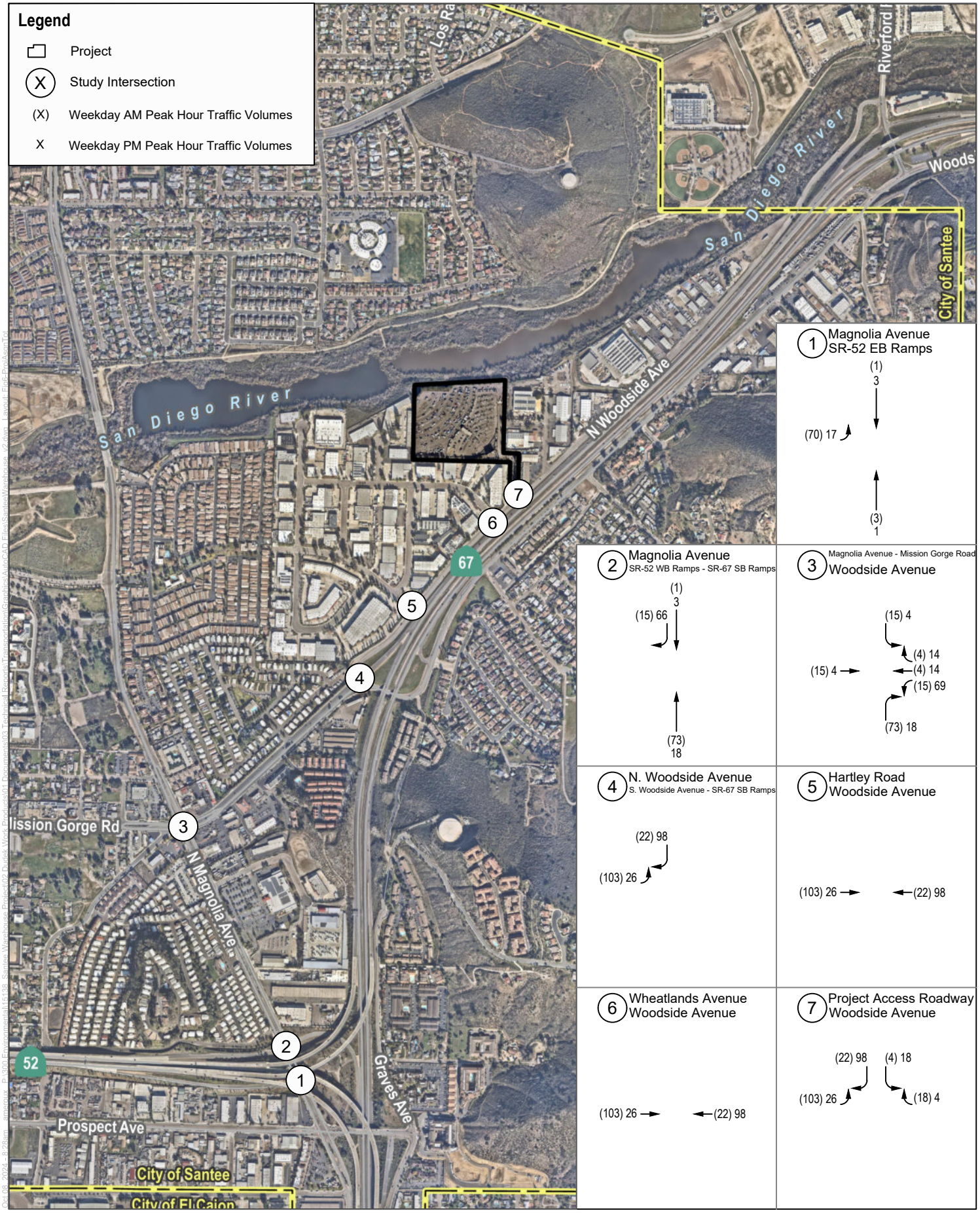
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FIGURE 4.12-**5**

Project Trip Assignment (Trucks – PCE)

Palisade Santee Commerce Center Project

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SOURCE: SanGIS, Open Street Maps

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NOT TO SCALE

FIGURE 4.12-**6**

Total Project Trip Assignment (Cars and Trucks – PCE)

Palisade Santee Commerce Center Project

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Transit, Bicycle, and Pedestrian Facilities

The Project site is served by passenger rail and bus services, as shown in Figure 4.12-1. The San Diego Metropolitan Transit System (MTS) provides public transportation to the Project area. The nearest bus stop is located west of Magnolia Avenue and Mission Gorge Road – Woodside Avenue intersection, approximately 0.90 miles from the Project site. Routes 832 and 833 serve this bus stop. The City of Santee is served by the Green Line Trolley (Route 530), with the sole station located at the Santee Transit Center. The Green Line connects Santee to the larger San Diego region and provides service into Downtown San Diego. The Santee Transit Center is located approximately 1.4 miles northeast of the Project site. The Project would not relocate any existing bus stops and would not require any changes to existing or future routes. The Project would not require an increase in service frequency or additional routes to serve the Project area. Therefore, development of the Project would not conflict with the existing bus routes or bus stops. Impacts to transit would be less-than-significant.

As discussed in Section 4.12.1 and shown in Figure 4.12-2, Class II Bike Lane runs along Woodside Avenue; the bike lane along Woodside Avenue connects to bike route along Shadow Hill Road and Northcote Road, however, it does not connect to any other bicycle facility in the City. The City's General Plan Mobility Element recommends Class II bike lanes along Mission Gorge Road between Riverview Parkway and Magnolia Avenue and along Magnolia Avenue between Mast Boulevard and Mission Gorge Road. While the Project does not involve any plans to construct these planned and contemplated facilities, the Project's design would ensure that these facilities can be readily developed when the City commences implementation of those projects. Moreover, the Project would provide street and frontage improvements and access to the site would be facilitated for both pedestrian and bicycle users in the overall area. The frontage improvements associated with Project development would not conflict with any existing or planned facilities.

The Project would be responsible for constructing frontage improvements including sidewalks along the northern side of N. Woodside Avenue and connect to the existing sidewalk along N. Woodside Avenue that lies to the west of the Project's driveway. Due to these improvements, the Project would not conflict with any existing or planned facilities.

The proposed project would result in a traffic effect at the N. Woodside Avenue/Woodside Avenue - SR-67 SB Off-Ramp intersection, under Existing plus Project, Near Term plus Project and Horizon Year plus Project conditions. The Project will pay its traffic impact fees and construct sidewalk along N. Woodside Avenue on the east, through the street's intersection with the SR-67 southbound off-ramp and then connect to the existing sidewalk on Woodside Avenue on the west and near the Project driveway, for a total of 990 linear feet or approximately 0.2 miles. In addition, the Project applicant will fund its fair share in the amount of $476,000 payable to the City to rehabilitate the pavement of N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to, on the east, the easternmost edge of the Project driveway's intersection with N. Woodside Avenue~~, to the satisfaction of the City Engineer~~. In addition, the Project applicant will construct a southbound right turn at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection subject to approval by the City and Caltrans. Additionally, the Project applicant will construct a pedestrian crosswalk with pedestrian refuge along the west leg of the intersection and reconstruct the paved sidewalk and bike lane along with other improvements, such as reconstructing storm drain outlet and pipe and protecting the existing soundwall. Based on the queuing analysis, it is also recommended that "KEEP CLEAR'" pavement markings be installed west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue. The above-mentioned improvements would be implemented as **PDF-TRA-1 Multi-modal Intersection Improvements** at N. Woodside Avenue/Woodside Avenue - SR-67 SB Off-Ramp intersection. These

improvements will also ensure the Project's consistency with Policy 2.1 and is explained in detail in the TIS (Appendix L of this EIR).

Based on analysis provided above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and its impact to transportation plans and programs would be **less than significant**.

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

Significant and Unavoidable Impact. The Project would generate VMT in excess of the significance threshold even with the implementation of mitigation, as discussed below.

VMT Screening

The requirements to prepare a detailed transportation VMT analysis apply to all discretionary land development projects that are not exempt from CEQA, except those that meet at least one of the transportation screening criteria described below. A project that meets at least one of the screening criteria per City's VMT guidelines below would be presumed to have a less than significant VMT impact due to project characteristics and/or location.

Projects Located in a Transit-Accessible Area

Projects located within a half-mile radius of an existing major transit stop or an existing stop along a high-quality transit corridor[2] may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. A map of existing major transit stops and existing stops along high-quality transit corridors is provided in Appendix D of the City's VMT guidelines. The proposed Project is not located within a half-mile radius of an existing transit priority area or an existing stop along a high-quality transit route, therefore it cannot be screened out using this criteria.

Small Projects

Projects generating 500 or fewer net new daily vehicle trips may be presumed to have a less-than significant impact absent substantial evidence to the contrary. Trips are based on the number of vehicle trips calculated using SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (SANDAG 2002) or ITE trip generation rates with any alternative modes/location-based adjustments applied. As shown in Section 4.12.3, the Project would generate 1,440 PCE daily trips, therefore would not be considered a small project and cannot be screened out using this criteria.

Local Serving Retail Projects

Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel. Local serving retail projects less than 50,000 square feet that are expected to draw approximately 75% of customers from the local area (roughly 3-miles) are presumed to have a less than significant impact absent substantial evidence to the contrary. Retail projects that are between 50,000 square feet and 125,000 square feet

[2] Major transit stop: a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. High quality transit corridor: a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute periods.

with similar customer attraction (approximately 75% from local area) may also be presumed locally serving. The Project does not propose retail uses; therefore, it cannot be screened out using this criteria.

Local Serving Public Facilities

Public facilities that serve the surrounding community or public facilities that are passive use may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. Transit centers, public schools, libraries, post offices, park-and-ride-lots, police and fire facilities, parks and trailheads, government offices, passive public uses and other public uses are considered local serving public facilities. The Project does not propose local serving public facilities; therefore, it cannot be screened out using this criteria.

Redevelopment Projects with Lower Total VMT

A redevelopment project may be presumed to have a less-than-significant impact absent substantial evidence to the contrary if the proposed project's total project VMT is less than the existing land use's total VMT and the CEQA action includes closing the existing land use. Although the Project would redevelop an existing site, this criterion was not applied to the Project.

Infill Affordable Housing

City of Santee presumes deed-restricted affordable housing projects that meet the following conditions meet the City's screening criteria and would not require a VMT analysis.

- Is an infill project (note that most of the City of Santee is presumed to be an infill location);
- Consists of a minimum of 52% affordable housing;
- Is within ½ mile radius of a transit stop or station; and
- Project-provided parking does not exceed parking required by the City's Municipal Code

The Project does not propose infill affordable housing; therefore, it cannot be screened out using this criteria.

Projects in a VMT-Efficient Area

A VMT-efficient area is any area within the City with an average VMT/capita or VMT/employee below the thresholds as compared to the baseline City/Regional VMT per capita for the TAZ that the project is located within. VMT efficient areas are accessed through SANDAG's SB743 VMT maps[3].

The Project site is within Census Tract 166.07 under the current SANDAG Travel Demand model. Based on the San Diego Region SB743 VMT Maps and using the City's criteria for evaluation of Industrial projects, the Project is within a high-VMT generating area for VMT per employee (i.e., greater than or equal to the regional mean). Compared to the regional mean of 18.9 VMT per employee, the VMT per employee of the Project's census tract is 22.2 VMT.

Therefore, it can be inferred that the proposed Project is not located in a VMT-efficient area and would therefore result in a significant VMT impact.

[3] San Diego Region SB 743 VMT Map accessed at San Diego Region SB743 VMT Maps (arcgis.com)

VMT Threshold of Significance

The significant thresholds and specific VMT metrics used to measure VMT are described by land use type below:

> **Industrial Employment projects** located within a VMT-efficient area may be presumed to have a less than-significant impact absent substantial evidence to the contrary. A VMT-efficient area for industrial employment projects is any area with an average VMT/employee at or below the baseline regional average for the TAZ that the project is located within.

Project VMT Analysis

Since the Project's daily trip generation estimate would be below 2,400 average daily trips, and the Project's census tract includes other employee-based uses, a project-specific model run by SANDAG would not be required. The results of the SANDAG SB 743 VMT maps have been used in the Project's VMT analysis. Compared to the regional mean of 18.9 VMT per employee, the VMT per employee of the Project's census tract is 22.2 VMT. Because the Project's VMT is higher than the regional average of the census tract it is located within, the Project would result in a significant VMT impact. Table 4.12-2 provides Project's VMT summary. Figure 4.12-7 illustrates the SANDAG SB 743 VMT Map for the Project site.

Table 4.12-2. Project VMT Summary

Criteria	VMT/per Employee
Baseline Regional VMT/employee	18.9
VMT Threshold (at or below Baseline)	18.9
Project TAZ VMT/Employee	22.2
% Reduction Required	15%

Source: Appendix L of this EIR.
Note: VMT = vehicle miles traveled

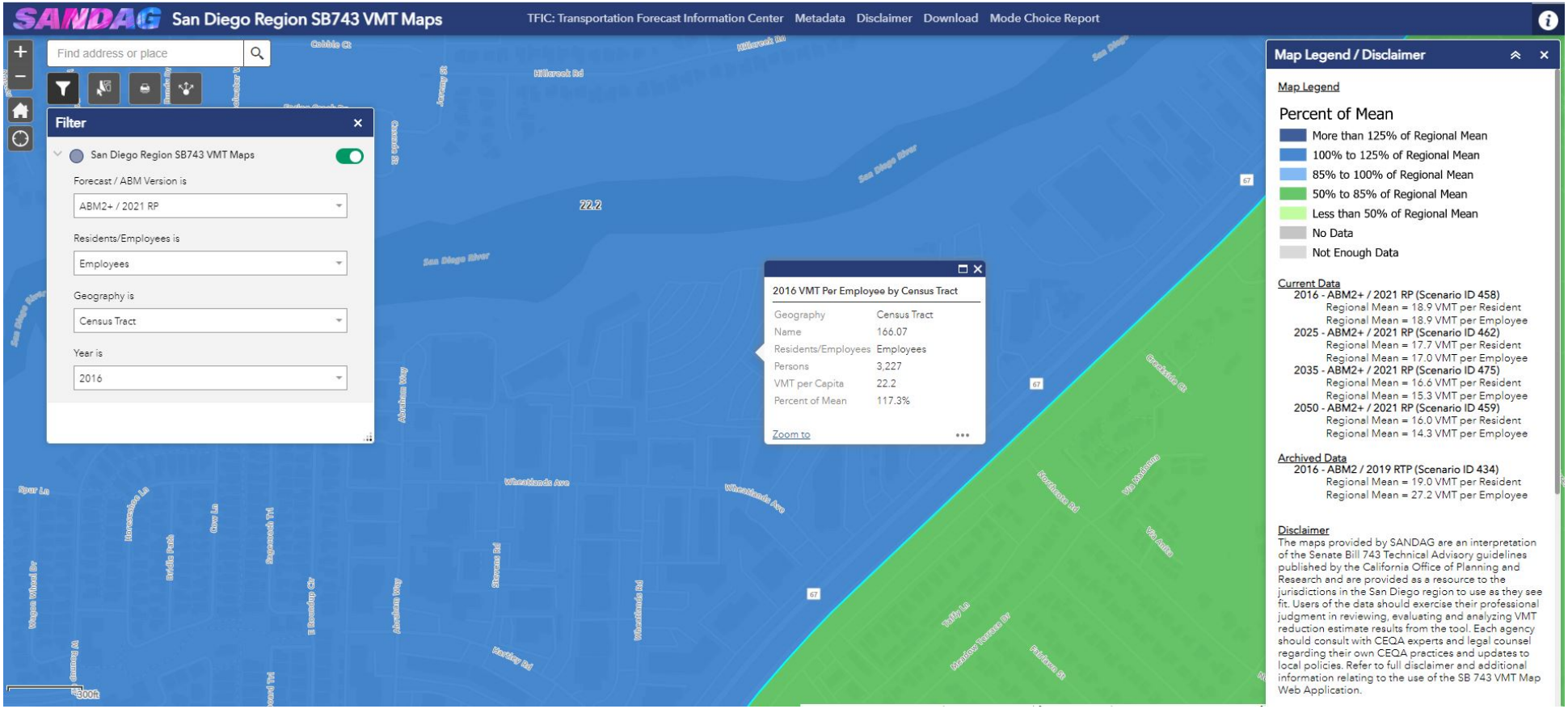


FIGURE 4.12-7

SANDAG SB 743 Map

Palisade Santee Commerce Center Project

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To mitigate a project's VMT impacts, the project applicant must reduce VMT, which can be done by either reducing the number of automobile trips generated by the project or by reducing the distance that people drive. The following strategies are available to achieve this:

1. Modify the project's built environment characteristics to reduce VMT generated by the project.
2. Implement TDM measures to reduce VMT generated by the project

Strategies that reduce single-occupant automobile trips or reduce travel distances are called Transportation Demand Management (TDM) strategies. The City VMT guidelines recommend using strategies from the California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (2021) (GHG Reduction Handbook) and the SANDAG Mobility Management Guidebook/VMT Reduction Calculator Tool.

The following table includes TDM strategies from CAPCOA 2021 and their applicability to the Project.

Table 4.12-3. Transportation Demand Management Measures

Trip Reduction Program	Description	Maximum Reduction Possible	Project Reduction Possible
T-5	Implement Commute Trip Reduction Program (CTR) (Voluntary): CTR programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.	4%	Assuming 100% employees are eligible for program, a 4% reduction can be achieved.
T-6	Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring) (Must include T-6 - T-10)	26%	Selected measures from T-6 to T-10 are included in this measure.
T-7	Implement Commute Trip Reduction Marketing: This measure will implement a marketing strategy to promote the project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.	4%	Assuming 100% employees are eligible for program, a 4% reduction can be achieved by the Project. See Appendix B of Appendix L to this Draft EIR for details on Project VMT reduction.
T-8	Provide Ridesharing Program: This measure will implement a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT, and GHG emissions.	8%	Assuming sub-urban location of the Project, 100% employees are eligible for program, a 4% reduction can be achieved by the Project. See Appendix B of Appendix L to this Draft EIR for details on Project VMT reduction.

Table 4.12-3. Transportation Demand Management Measures

Trip Reduction Program	Description	Maximum Reduction Possible	Project Reduction Possible
T-9	Implement Subsidized or Discounted Transit Program: This measure will provide subsidized or discounted, or free transit passes for employees and/or residents. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and thus a reduction in GHG emissions.	5.5%	Assuming average transit fare of $2.50 would be subsidized and 100% of the employees would be eligible to participate in this program. Because 72.5% of the Project trips are from employees, approximately 72.5% of Project-generated VMT can be as assumed to be from employees. Based on the above inputs, a 0.74% VMT reduction can be achieved by the Project. See Appendix B of Appendix L to this Draft EIR for details on Project VMT reduction.
T-10	Provide End of Trip Bicycle Facilities: This measure will install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions.	4.4%	For San Diego-Carlsbad area, a 0.57% reduction can be achieved. See Appendix B of Appendix L to this Draft EIR for details on Project VMT reduction.
T-11	Provide Employer-Sponsored Van pool: This measure will implement an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long-distance, single-occupied vehicles to shared vehicles reduces overall commute VMT, thereby reducing GHG emissions.	20.4%	It is likely that individual tenants may have employees that sign up with the SANDAG Sustainable Transportation Services program, formerly known as iCommute through ride-sharing program. Therefore, only T-8 has been included as reduction measure.
T-12	Price Workplace Parking: This measure will price on-site parking at workplaces. Because free employee parking is a common benefit, charging employees to park on site increases the cost of choosing to drive to work. This is expected to reduce single-occupancy vehicle commute trips, resulting in decreased VMT, thereby reducing associated GHG emissions.	20%	Not a suitable measure due to sub-urban project setting that provides few alternate transportation options for employees.
T-13	Implement Employee Parking Cash-Out: This measure will require project	12%	Not a suitable measure due to sub-urban project setting that provides

Table 4.12-3. Transportation Demand Management Measures

Trip Reduction Program	Description	Maximum Reduction Possible	Project Reduction Possible
	employers to offer employee parking cash-out. Cash-out is when employers provide employees with a choice of forgoing their current subsidized/free parking for a cash payment equivalent to or greater than the cost of the parking space. This encourages employees to use other modes of travel instead of single occupancy vehicles. This mode shift results in people driving less and thereby reduces VMT and GHG emissions.		few alternate transportation options for employees.
T-18	Provide Pedestrian Network Improvement:	6.4%	The Project would add 0.2-mile of sidewalk along its access road from Woodside Avenue and at the Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection. This would result in approximately 0.6 mile of sidewalk from existing 0.4 mile of sidewalk between Project driveway and the Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection. Based on the above inputs, a **2.51%** VMT reduction can be achieved by the Project.

Source: CAPCOA 2021 and Appendix L of this Draft EIR
Note: VMT = vehicle miles traveled

Based on the review of applicable trip reduction measures to the Project, following measures as part of T-5 Commute Trip Reduction Program have been selected to calculate possible reduction:

T-5 Implement Commute Trip Reduction (CTR) Program to include the following measure and estimated Project VMT reduction (in %):

- T-7 Implement Commute Trip Reduction Marketing (4%)
- T-8 Provide Ridesharing Program (4%)
- T-9 Implement Subsidized or Discounted Transit Program (0.74%)
- T-10 Provide End of Trip Bicycle Facilities (0.57%)
- T-18 Provide Pedestrian Network Improvements (2.51%)

See Appendix B of Appendix L of this EIR for calculation of project VMT reduction % corresponding to measures T-7, T-8, T-9, T-10, and T-18.

To calculate VMT reduction under each component, the following formula is used:

$$\text{VMT Reduction\%} = 1 - [(1 - 4\%) * (1 - 4\%) * (1 - 0.74\%) * (1 - 0.57\%)*(1 - 2.51\%)] = 11.3\%$$

A VMT reduction of 11.3% would be achieved through the implementation of CTR measures. A reduction of 15% is required to reduce the VMT per employee to at or below regional level. As shown in Section 4.12.5, **MM-TRA-1 Trip Reduction Program** would be implemented by the Project's tenants to reduce the Project's VMT and **MM-TRA-2 Construction of Sidewalk** would improve pedestrian network connectivity in the area. Because the Project's VMT would not be reduced to below significance threshold even with the implementation of **MM-TRA-1 and MM-TRA-2**, the Project's VMT impact would remain **significant and unavoidable**.

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)?

Less than Significant. The following discussion describes the potential for increased hazards as a result of geometric design features of the Project, and/or as a result of the addition of Project traffic to adjacent roadways and intersections.

The access to the proposed Project would be from N. Woodside Avenue via an unsignalized intersection with the Project access driveway. Per City's request, an evaluation for eastbound left turn lane at this access driveway was conducted. The left-turn lane evaluation was conducted using the methodology from the American Association of State Highway Transportation Officials' (AASHTO 2018) – *Geometric Design of Highways and Streets* ("Green Book"). As shown in the evaluation provided in Appendix L of this EIR, because the left-turning volumes at the intersection exceed the AASHTO suggested left-tun lane guidance of 50 or more vehicle/hour and due to high truck volume, a dedicated eastbound left turn lane shall be constructed at the Project access driveway/N. Woodside Avenue intersection. The Project would be responsible for constructing frontage improvements including sidewalks along the northern side of N. Woodside Avenue and connect to the existing sidewalk along N. Woodside Avenue that lies to the west of the Project's driveway. The Project would also install a crosswalk to improve pedestrian circulation at the Project access driveway/N. Woodside Avenue.

On-site circulation and access to the Project will be provided by a circuitous roadway (see Figure 3-7, Project Description) that would also serve as fire lane. The width of the internal roadway will be between 30 feet to 40 feet. The on-site circulation will be designed per City's Standard Drawings and requirements of the Fire Code to provide turn radii for fire truck and apparatus to access all parts of the site. A truck turn analysis showing the availability of appropriate turn radii on the Project site and access driveway from N. Woodside Avenue for a semitrailer, trash truck and fire engine have been provided to the City as part of the Project's design review submittal.

The proposed Project would result in a traffic effect at the N. Woodside Avenue/ Woodside Avenue - SR-67 SB Off-Ramp intersection, under Existing plus Project, Near Term plus Project and Buildout plus Project conditions. An intersection lane queuing analysis, using SimTraffic 11 software, was conducted to determine the 95th percentile (design) queue of the existing storage lanes at the N. Woodside Avenue/ Woodside Avenue – SR-67 SB Off-Ramp intersection for informational purposes. The intersection's queues were calculated for the Existing and Existing plus Project conditions. Under Existing conditions, there are no movements where the 95th percentile queues would exceed their storage lengths during the weekday AM or weekday PM peak hours. Under Existing plus Project conditions, all movements would experience an increase in vehicular queues however, most queues would be accommodated in the storage length available, except for the eastbound left turn lane (during AM peak hour). It should be noted that there is no specific criteria for assessing queuing impacts, however, it is recommended that

"KEEP CLEAR'" pavement markings be installed west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue.

Additionally, it should be noted that under Existing and Existing plus Project conditions analyzed, the westbound turn movements at the SR-67 off-ramp do not exceed the storage length available. The analysis indicates there are currently no queuing issues that may potentially spill back onto the SR-67 mainline. See Appendix L for details on queuing analysis at the N. Woodside Avenue/ Woodside Avenue - SR-67 SB Off-Ramp intersection.

The Project will pay its traffic impact fees and construct a missing segment of sidewalk along N. Woodside Avenue near the N. Woodside Avenue/Woodside Avenue - SR-67 SB Off-Ramp intersection and near the Project driveway, for a total of 990 linear feet or approximately 0.2 miles. The Project would also be responsible for pavement rehabilitation and restriping of N. Woodside Avenue to the satisfaction of the City Engineer from Caltrans right-of-way at the intersection of the SR-67 to the easternmost edge of the Project driveway's intersection with N. Woodside Avenue. In addition, the Project would install approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk.

Therefore, with proposed improvements at the Project access and implementation of **PDF-TRA-1 Multi-modal Intersection Improvements** at and west of the N. Woodside Avenue/ Woodside Avenue - SR-67 SB Off-Ramp intersection, the Project would not increase hazards because of a roadway design feature or incompatible uses and impact would be **less than significant**.

D. Would the Project result in inadequate emergency access?

Less-than-Significant Impact. As mentioned above, on-site circulation and access to the Project will be provided by a circuitous roadway that would also serve as fire lane. All street improvements will be designed with adequate width, turning radius, and grade to facilitate access by City's firefighting apparatus, and to provide alternative emergency ingress and egress. The site plan would be subject to plan review by the City's Fire Department to ensure proper access for fire and emergency response is provided and required fire suppression features are included. Therefore, the Project's impact due to inadequate emergency access would be **less than significant**.

4.12.5 Project Design Features, Mitigation Measures, and Level of Significance After Mitigation

The proposed Project would result in a traffic effect at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB off-Ramp intersection, under Existing plus Project, Near Term plus Project and buildout plus Project conditions, .**PDF-TRA-1 Multi-modal Intersection Improvements** will be implemented consistent with the City's Mobility Element goals and policies in lieu of improving delay at the intersection.:

PDF-TRA-1 Multi-modal Intersection Improvements: Prior to the issuance of a building permit, the Project applicant will pay its traffic impact fees to the satisfaction of the City Engineer. Prior to obtaining the Certificate of Occupancy, the Project will construct a new on-site sidewalk to connect the main entrance of the building with the existing sidewalk on N. Woodside Avenue. Prior to the issuance of a building permit, ~~T~~the Project applicant will also fund its fair share in the amount of $476,000 payable to the City to rehabilitate the pavement with a full width and adequate structural section of N. Woodside Avenue starting from, on the west, where it meets the Caltrans right-of-way at the intersection of the SR-67 to the eastern most edge of the Project driveway's intersection with N.

Woodside Avenue~~, to the satisfaction of the City Engineer~~. The Project applicant will install also approximately 1,240 SF of new roadway to fill in an unpaved area between the edge of the existing roadway and the new proposed sidewalk near N. Woodside Avenue's intersection with the SR-67. The Project will install "KEEP CLEAR'" pavement markings west of this intersection to maintain vehicular ingress and egress to/from the Mission Del Magnolia community to eastbound Woodside Avenue.

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

Impacts would be less than significant. No mitigation is required.

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

As described in response to Threshold 4.12b, based on the VMT reduction results, implementation of the TDM Program and sidewalk improvements are anticipated to reduce the VMT per-capita generated per employee by 11.3%. Thus, with implementation of the TDM Program, the Project is anticipated to reduce VMT per employee by 11.3%. Because the mitigation measures would not fully reduce the VMT per employee to less than significant levels (i.e. 15% or more), the impact is only partially mitigated, and the Project is considered to have a significant and partially mitigated impact. Therefore, even with implementation of **MM-TRA-1** and **MM-TRA-2**, impacts related to VMT would be **significant and unavoidable**.

MM-TRA-1 Trip Reduction Program: Prior to the issuance of first Certificate of Occupancy, the Project tenant will prepare a Trip Reduction program. The program shall include the following components:

1. Implement Commute Trip Reduction Marketing:
   a. Set-up a Transportation Kiosk, either physically on-site or online, with transportation information that employees could access at work or on their smart phones or personal computers. If an online kiosk, information can be available on the company's website (or intranet, or internal website). The Project developer or property manager will have responsibility for setting up and maintaining the information center. The Transportation Kiosk will have site-specific information about all the measures, services, and facilities discussed in this Program. In addition, the information center will include:
   b. A summary of local bus routes and local bicycle facilities to provide further information about their routes and schedules and the incentive programs available to transit users.
   c. Information about ride matching services (SANDAG - Bike Services) and on-site ride matching) and the incentive programs available to carpools.
   d. Information about services such as Uber, Lyft, and other on-demand transportation services.
   e. A local bikeways map and bicycling resources
   f. Availability of bicycle parking such as lockers and amenities including bike pumps, repair stations, full coverage lighting and security cameras.
   g. Information about bicycle education classes taught by certified league instructors from the San Diego County Bicycle Coalition.

2. **Provide Ridesharing Program:** The Project tenant will promote ride-sharing programs through a multi-faceted approach, such as designating a certain percentage of parking spaces for ride-sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles, and/or providing a website or message board for coordinating rides. A designated employee may partner with SANDAG to use programs such as SANDAG Vanpool, Employer Commuter Program and Guaranteed Ride Home.
3. **Implement Subsidized or Discounted Transit Program:** The Project tenant would provide or reimburse the cost of monthly transit passes (such as Pronto card or mobile app) to the employees who use bus or rail transit to work to create incentive programs that reward employees for utilizing non-single occupancy vehicles to commute.
4. Provide End of Trip Bicycle Facilities: The Project will provide at least 15 bicycle parking spaces per City's parking code requirement[4]. Where possible, appropriate designed electrical outlets will be included near the bicycle racks for charging electric bicycles (E-bikes).

MM-TRA 2 Construction of Sidewalk: The Project will construct a new sidewalk along a portion of N. Woodside Avenue to create a continuous sidewalk along N. Woodside Avenue where it intersects the SR-67. Together, with the sidewalk constructed per PDF-TRA-1, this will be a total of 990 linear feet of new sidewalk. If the applicant, despite commercially reasonable efforts, is unable to obtain the necessary permits to construct the portion of sidewalk located outside of the City of Santee's right-of-way, the applicant will have an additional six months following the issuance of the Certificate of Occupancy to complete that portion. If, at the end of that six-month period, the applicant is still unable to construct the sidewalk due to the continued inability to obtain the required permits, the project will pay an in-lieu fee in the amount of $50,000 to the City to complete this work.

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)?

Impacts would be less than significant. No mitigation is required. Improvements to facilitate Project access along N. Woodside Avenue and sidewalk and pavement rehabilitation at the N. Woodside Avenue/Woodside Avenue – SR-67 southbound off-ramp intersection and along N. Woodside Avenue will be constructed by the applicant as **PDF-TRA-1 Multi-modal Intersection Improvements**.

D. Would the Project result in inadequate emergency access?

Impacts would be less than significant. No mitigation is required.

[4] Per City's code 5% of motorized parking should be bicycle parking, therefore 5% of 301 car parking spaces = 15 bicycle parking spaces.

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4.13 Utilities and Service Systems

This section describes the existing utility conditions of the Palisade Santee Commerce Center Project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to the implementation of the Project.

In addition to the documents incorporated by reference (see Section 2.7 of Chapter 2 of this Environmental Impact Report [EIR]), the following analysis is based, in part, on the following sources:

- Preliminary Hydrology Study for Palisade Santee Business Center, prepared by DRC Engineering, Inc. in January 2024 (Appendix J-1)
- Water Study for Development at 10990 North Woodside Drive, prepared by HDR in April 2023 (Appendix M)

4.13.1 Existing Conditions

Water

Water Supply

Domestic water service is provided to the Project area by the Padre Dam Municipal Water District (PDMWD). PDMWD's service area is approximately 72 square miles and is divided into two major geographic service areas – the Western Service Area and the Eastern Service Area. The Western Service Area encompasses the City of Santee (City), a small portion of El Cajon, and a small portion of the unincorporated County community of Lakeside (PDMWD 2021).

The primary potable water supply source within the PDMWD's service area is imported water from the San Diego County Water Authority (SDCWA) through three connections. The potable water supply is imported from the California State Water Project (bSWP) and the Colorado River by Metropolitan Water District of Southern California (Metropolitan). In addition, SDCWA purchases up to 50,000 acre-feet per year (AFY) from the Carlsbad Desalination Plant. The PDMWD's water supplies also include recycled water and a very small amount of groundwater used to supplement the recycled system (PDMWD 2021).

Pursuant to the Urban Water Management Planning Act, PDMWD prepares an Urban Water Management Plan (UWMP) on a five-year basis to evaluate current and projected water supplies and demands amongst other water planning issues. PDMWD's UWMP includes plans for the provision of water (including drought scenarios) for its service area. The plan uses regional population, land use plans, and projections of future growth as the basis of planning for future water supply and demonstrating compliance with state water conservation goals and policies. PDMWD comprehensively updates its UWMP on a 5-year basis to refine population projections and include all new land use patterns and development. In June 2021, PDMWD certified its 2020 UWMP which covers the 2020-2045 planning period, which was used in the analysis below.

The 2020 UWMP determined that PDMWD has sufficient water supply to meet current and projected water demands through the applicable planning horizon (i.e., through 2040 according to the 2015 UWMP and through 2045 according to the 2020 UWMP) during normal-, historic single-dry-, and historic multiple-dry-year periods, as shown in Table 4.13-1. This tables presents the supplies and demands for the various "drought scenarios for the projected planning periods in five-year increments. Demands for dry years are shown with the effects of assumed urban demand reduction (conservation) measures that would be implemented during drought conditions.

Table 4.13-1. Supply and Demand Comparison (Acre-Feet per Year)

Supply and Demand		2025	2030	2035	2040	2045
Normal Year						
Supply totals		13,674	14,818	15,855	16,705	17,176
Demand totals		13,674	14,818	15,855	16,705	17,176
Difference		0	0	0	0	0
Single-Dry Year						
Supply totals		14,586	15,751	16,819	17,685	18,148
Demand totals		14,586	15,751	16,819	17,685	18,148
Difference		0	0	0	0	0
Multiple Dry Years Supply and Demand Comparison						
First Year	Supply totals	14,586	15,751	16,819	17,685	18,148
	Demand totals	14,586	15,751	16,819	17,685	18,148
	Difference	0	0	0	0	0
Second Year	Supply totals	14,732	15,909	16,987	17,862	18,329
	Demand totals	14,732	15,909	16,987	17,862	18,329
	Difference	0	0	0	0	0
Third Year	Supply totals	14,879	16,068	17,157	18,040	18,513
	Demand totals	14,879	16,068	17,157	18,040	18,513
	Difference	0	0	0	0	0
Fourth Year	Supply totals	15,028	16,228	17,329	18,221	18,698
	Demand totals	15,028	16,228	17,329	18,221	18,698
	Difference	0	0	0	0	0
Fifth Year	Supply totals	15,178	16,391	17,502	18,403	18,885
	Demand totals	15,178	16,391	17,502	18,403	18,885
	Difference	0	0	0	0	0

Source: PDMWD 2021.

Water Infrastructure

PDMWD's existing water distribution system includes approximately 300 miles of underground water mains. The distribution system includes groundwater wells, reservoirs, transmission and distribution pipelines, pump stations, pressure reducing stations, and a hydrogenation station (PDMWD 2022).

PDMWD monitors the conditions of its water infrastructure and plans for replacements, upgrades and new infrastructure in its Master Plan. PDMWD's most recent master plan was prepared in 2022 and contains plans for a 25-year planning horizon. The Master Plan update includes both the district's 2015 Comprehensive Facilities Master Plan and the 2020 Urban Water Management Plan (PDMWD 2022). The 2022 Master Plan includes plans for a Capital Improvement Plan for water, wastewater, and recycled water projects for the next 20 years, as a large portion of the Plan is to revise demand and flow forecast projections, as well as to identify system deficiencies and improvements in the water, wastewater, and recycled water systems.

Wastewater

The PDMWD collects the wastewater for the City, where the water is transported to the City's Water Recycling Facility or to the Point Loma facility which is managed by the City of San Diego Metropolitan Wastewater System (PDMWD 2023). The PDMWD manages the wastewater collection system within its 164-mile service area to collect, treat, and dispose of wastewater delivered by the City. PDMWD facilities serve the City, the City of El Cajon, the City of San Diego and the County of San Diego (County). A wastewater collection system and interceptor sewers convey sewage to regional wastewater treatment plants, which are operated by the PDMWD and the County's Lakeside Interceptor (PDMWD 2019).

According to the Operation and Maintenance Program, the wastewater collection systems drain from the east to the west (PDMWD 2019). There are four diversion structures between the PDMWD wastewater collection system and the County's Lakeside Interceptor. Sewage from the City is treated at two locations— the City's Ray Stoyer Water Recycling Facility (WRF) and the Point Loma Facility (PLF). The PLF has a design flow capacity of 240 million gallons per day (mgd) and treats approximately 175 mgd, and the WRF has a design flow capacity of 2 mgd and treats on average 2 mgd (City of San Diego 2023; PDMWD 2023).

Sewer Infrastructure

Sanitary sewer service would be provided by the PDMWD. The Project would connect to the existing sanitary sewer line within the Project Driveway.

Existing Stormwater Drainage

The Project site is located on relatively flat to gently sloping topography, immediately south of the San Diego River. The topography slopes toward the river, from south to north, with a change in topography of a few feet (Appendix G). Drainage on-site occurs as sheet flow towards the northwest portion of the site and into the San Diego River over natural terrain, with no on-site storm drains. Approximately 3.5 acres of offsite run-on currently flows onto the site. An existing 24-inch culvert located under Interstate 67 outlets at the entrance of the site, off of Woodside Avenue. This culvert collects approximately 2.8 acres from the freeway as well as the southern portion of Woodside Drive. An additional 0.7 acres covering the northern portion of Woodside Drive collects in the curb and gutter, from south of Wheatlands Drive, and outlets at the existing entrance of the site. In total, approximately 16.8 acres of tributary area, including on-site runoff and run-on, flows to the northwest portion of the Project site (Appendix J-1, Hydrology Study).

Solid Waste

Solid waste from the Project site is expected to be disposed at the Sycamore Landfill (City of Santee 2003). The Sycamore Landfill, located in Santee (at 8514 Mast Blvd), is permitted to receive 5,000 tons of solid waste per day, has a remaining disposal capacity of 113,972,637 cubic yards, and has an approximate cease operation date of December 2042 (CalRecycle 2019).

Construction waste is typically disposed of at inert landfills, which are facilities that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. The Sycamore Landfill is the only landfill in the City that accepts inert waste. Commercial and residential trash hauling, as well as industrial solid waste and recycling collection and disposal services are provided by Waste Management Inc. under an exclusive franchise agreement with the City (City of Santee 2024).

Electricity

Electrical power for the City is provided by San Diego Gas & Electric (SDG&E). The territory serviced by SDG&E encompasses approximately 4,100 square miles and 25 communities (SDG&E 2022). Electric service is currently provided by San Diego Gas & Electric and several above-ground and underground electrical lines are located adjacent to the Project site and adjacent streets.

Natural Gas

Natural gas service for the City is provided by SDG&E. There is currently no gas service to the Project site. The nearest SDG&E gas distribution pipeline is a high-pressure gas distribution main located approximately 230 feet southeast of the project site, within Woodside Avenue (SDG&E 2024).

Telecommunications Facilities

The existing telecommunication services in the vicinity of the Project site are supplied by various utility providers such as T-Mobile, Cox, and Verizon.

4.13.2 Relevant Plans, Policies, and Ordinances

Federal

Clean Water Act

The federal Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the U.S. The CWA made it unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit was obtained under its provisions. The CWA assists in the development and implementation of waste treatment management plans and practices by requiring provisions for treatment of waste using best management practices (BMP) technology before there is any discharge of pollutants into receiving waters, as well as the confined disposal of pollution, so that it will not migrate to cause water or other environmental pollution. Additionally, CWA funds the construction of sewage treatment plants under the construction grants program.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (Code of Federal Regulations, Title 40, Section 268, Subpart D), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs that include federal landfill criteria. The federal regulations address the location, operation, design, and closure of landfills, as well as groundwater monitoring requirements.

National Pollutant Discharge Elimination System Permit Program

The National Pollutant Discharge Elimination System (NPDES) permit program was established in the CWA to regulate municipal and industrial discharges to surface waters of the United States. Discharge from any point source is unlawful unless the discharge is in compliance with an NPDES permit. The federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants contained in the discharge; prohibitions on

discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities.

State

California Code of Regulations, Titles 14 and 27

Title 14 (Natural Resources, Division 7) and Title 27 (Environmental Protection, Division 2 [Solid Waste]) of the California Code of Regulations govern the handling and disposal of solid waste and operation of landfills, transfer stations, and recycling facilities.

Assembly Bills 939 and 341: Solid Waste Reduction

The California Integrated Waste Management (CIWM) Act of 1989 (AB 939) (Public Resources Code Sections 41000-41460) was enacted as a result of a national crisis in landfill capacity, as well as a broad acceptance of a desired approach to solid waste management of reducing, reusing, and recycling. AB 939 mandated local jurisdictions to meet waste diversion goals of 25% by 1995 and 50% by 2020 and established an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. AB 939 requires cities and counties to prepare, adopt, and submit to the California Department of Resources Recycling and Recovery (CalRecycle) a source reduction and recycling element to demonstrate how the jurisdiction will meet the diversion goals. Other elements included encouraging resource conservation and considering the effects of waste management operations. The diversion goals and program requirements are implemented through a disposal-based reporting system by local jurisdictions under CIWM board (CIWMB) regulatory oversight. Since the adoption of AB 939, landfill capacity is no longer considered a statewide crisis. AB 939 has achieved substantial progress in waste diversion, program implementation, solid waste planning, and protection of public health, safety, and the environment from landfills operations and solid waste facilities.

In 2011, AB 341 was passed, making a legislative declaration that it is the policy goal of the state that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. AB 341 requires that local agencies adopt strategies that will enable 75% diversion of all solid waste by 2020. This bill requires all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place.

Senate Bill 1374: Construction and Demolition Waste Reduction

Senate Bill (SB) 1374 requires that annual reports submitted by local jurisdictions to CIWMB include a summary of the progress made in the diversion of construction and demolition waste materials. In addition, SB 1374 requires the CIWMB to adopt a model ordinance suitable for adoption by any local agency that required 50% to 75% diversion of construction and demolition waste materials from landfills. Local jurisdictions are not required to adopt their own construction and demolition ordinances, nor are they required to adopt CIWMB's model by default. The City does not have a construction and demolition waste reduction ordinance; however, per mandatory CALGREEN standards (see below), projects are required to divert 65% of their construction and demolition waste from landfills.

Assembly Bill 1826: Mandatory Commercial Organics Recycling

In October 2014, Governor Brown signed AB 1826 Chesbro (Chapter 727, Statutes of 2014) requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week.

(Organic waste is defined as food waste, green waste, landscape, and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.) This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. This law phases in the mandatory recycling of commercial organics over time. In particular, the minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to recycle organic waste.

Urban Water Management Plans (UWMP)

Pursuant to the California Urban Water Management Act (California Water Code Sections 10610-10656), urban water purveyors are required to prepare and update a UWMP every 5 years. UWMPs are prepared by California's urban water suppliers to support long-term resource planning and ensure adequate water supplies. Every urban water supplier that either delivers more than 3,000 AFY of water annually or serves more than 3,000 connections are required to assess the reliability of its water sources over a 20-year period under normal-year, dry-year, and multiple-dry-year scenarios in a UWMP. UWMPs must be updated and submitted to the California Department of Water Resources every five years for review and approval. The Project site is within the area addressed by the PDMWD UWMP.

Senate Bill 610 and Senate Bill 221: Water Supply Assessments

Senate Bills (SB) 610 and 221, amended into state law effective January 1, 2002, require the linkage between certain land use decisions made by cities and counties and water supply availability. The statutes require detailed information regarding water availability and reliability with respect to certain developments to be included in the administrative record to serve as an evidentiary basis for an approval action by the city or county on such projects. Under SB 610, a water supply assessment must be furnished to the local government for inclusion in any environmental documentation for certain types of projects, as defined in Water Code Section 10912 [a] and as subject to the California Environmental Quality Act (CEQA). A fundamental source document for compliance with SB 610 is the UWMP. The UWMP can be used by the water supplier to meet the standard for SB 610. SB 221 applies to the Subdivision Map Act, requiring applicants, per a tentative map, to verify that the public water supplier has sufficient water available to serve the proposed development. Because the Project would be less than 650,000 square feet, a water supply assessment was not required.

Sanitary Sewer General Waste Discharge Requirements

On May 2, 2006, the State Water Resources Control Board (SWRCB) adopted a General Waste Discharge Requirement (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than 1.0 mile of sewer pipe. The order provides a consistent statewide approach to reducing sanitary sewer overflows by requiring public sewer system operators to take all feasible steps to control the volume of waste discharges into the system in order to prevent sanitary sewer waste from entering the storm sewer system, and to develop a Sewer System Management Plan. The General Waste Discharge Requirement also requires that storm sewer overflows be reported to the SWRCB using an online reporting system.

California Green Building Standards

In 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code, Part 11 of Title 24 of the California Code of Regulations, is commonly referred to as CALGreen and establishes minimum mandatory standards as well as voluntary standards pertaining

to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all new construction of residential and non-residential buildings. CALGreen standards are updated periodically. The latest version (CALGreen 2022) became effective on January 1, 2023.

Mandatory CALGreen standards pertaining to water, wastewater, and solid waste include the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings.
- Mandatory reduction in outdoor water use through compliance with a local water-efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance.
- Diversion of 65% of construction and demolition waste from landfills.

Porter-Cologne Water Quality Control Act

In 1969, the California Legislature enacted the Porter-Cologne Water Quality Control Act ("Porter-Cologne Act") to preserve, enhance and restore the quality of the State's water resources. The Porter-Cologne Act established the SWRCB and the nine individual Regional Water Quality Control Boards (RWQCBs) as the principal state agencies with the responsibility for controlling water quality in California. Under the Porter-Cologne Act, water quality policy is established, water quality standards are enforced for both surface and groundwater, and the discharges of pollutants from point and non-point sources are regulated. The Porter-Cologne Act authorizes the SWRCB to establish water quality principles and guidelines for long-range resource planning, including groundwater and surface water management programs and control and use of recycled water.

California Health and Safety Code Section 115700

Under California Health and Safety Code Section 115700, a well is considered 'abandoned' or permanently inactive if it has not been used for one year, unless the owner demonstrates intention to use the well again. Section 115700 details procedures for the destruction or proper abandonment for permanently inactive wells.

Industrial General Permit

Industrial facilities such as manufacturers, landfills, mining, steam-generating electricity, hazardous waste facilities, transportation with vehicle maintenance, larger sewage and wastewater plants, recycling facilities, and oil and gas facilities are required to obtain coverage under the Statewide General Permit for Storm Water Discharges Associated with Industrial Activities, Order 2014-0057-DWQ (Industrial General Permit), which implements the federally required stormwater regulations in the state for stormwater associated with industrial activities. Permittees are required to prepare a Stormwater Pollution Prevention Plan for operational activities and implement a long-term water quality sampling and monitoring program unless an exemption is granted.

Local

City of Santee Municipal Code

Chapter 9.06. Stormwater Management and Discharge Control, of the Santee Municipal Code establishes requirements for sanitary sewage facilities in structures, including pipe size. The City of Santee has adopted these to effectively prohibit non-stormwater discharges to the stormwater conveyance system, to eliminate illicit

discharges and connections to the stormwater conveyance system, to reduce the discharge of pollutants from the stormwater conveyance systems to the maximum extent practicable to achieve applicable water quality objectives for surface waters in San Diego County. Additionally, to achieve compliance with Total Maximum Daily Load regulations. In order to obtain final occupancy approval, a project must be deemed compliant with the Clean Water Act, Porter-Cologne Act, and Regional MS4 Permit, to protect and enhance the water quality of the City's watercourses, water bodies, and wetlands.

Chapter 11.40. Excavation and Grading, of the Santee Municipal Code, applies to the minimum requirements for grading, excavating, and filling of land and provides water quality protection provisions. Additionally, implements the issuance of permits and the enforcement of the chapter provisions.

Chapter 12.30. Development Impact Fees, of the Santee Municipal Code contains several development impact fees. These fees are intended to offset the impacts that new development has on public facilities. As such, these fees are imposed on new development. The drainage fee provides funds for the installation of needed drainage improvements identified in the City of Santee Citywide Drainage Study. Additionally, the Project applicant would pay any development impact fees that are required for the Project.

San Diego County Integrated Waste Management Plan

Pursuant to the Integrated Waste Management Act, the Countywide Integrated Waste Management Plan for San Diego County describes the goals, policies, and objectives of the county for coordinating efforts to divert, market, and dispose of solid waste during the planning period through the year 2017. Countywide policies for reducing waste and implementing the programs are identified in the individual jurisdiction Source Reduction and Recycling Elements and (Household Hazardous Waste Elements and are intended to reduce costs, streamline administration of programs, and encourage a coordinated and planned approach to integrated waste management.

To avoid duplication of effort, all of the jurisdictions in the county participate in the San Diego County Integrated Waste Management Local Task Force (LTF). The LTF coordinates mandated planning, oversees implementation of new or countywide integrated waste management programs, and carries out an active legislative program. Regulatory reform, changes to state diversion requirements, and reduction of the costs of compliance are considered by the LTF, as well as other solid waste issues of regional or countywide concerns.

City of Santee General Plan

Objectives and policies related to utilities and service systems in the General Plan are located within the Land Use Element.

Land Use Element

Objective 3.0 Provide and maintain the highest level of service possible for all community public services and facilities.

Policy 3.1 The City should ensure that land divisions and developments are approved within the City only when a project's improvements, dedications, fees and other revenues to the City and other agencies fully cover the project's incremental costs to the City and other agencies. These costs are for providing new or upgraded capital improvements and other public facilities and equipment resulting from, and attributable to the project, which are necessary to protect and promote the public's health, safety and welfare and to implement feasible mitigation measures. Such facilities include, but are not limited to: parks, bridges, major roads, traffic signals, street lights, drainage

systems, sewers, water, flood control, fire, police, schools, hiking/bicycle trails and other related facilities. In calculating benefits of land divisions and developments, the City may consider other public objectives and goals including social, economic (job creation, secondary economic benefits, etc) and environmental factors.

Policy 3.2 The City should encourage the development and use of recycled water for appropriate land uses to encourage the conservation of, and reduce demand for, potable water.

Policy 3.3 The City should consider the use of public / private partnerships when appropriate to facilitate introduction of desirable and innovative development within the City.

Policy 3.4 The City shall continue to update and implement a 5-year Capital Improvement Program to improve existing public facilities and develop necessary new public facilities.

Policy 3.3 The City should coordinate the scheduling of planned Capital Improvement Projects with other agencies and utilities to minimize disruptions of City streets and facilities.

Policy 3.5 The City shall require the placement of utility lines underground where feasible.

Policy 3.6 Development projects shall be reviewed to ensure that all necessary utilities are available to serve the project and that any land use incompatibilities or impacts resulting from public utilities shall be mitigated to the maximum extent possible.

Conservation Element

Objective 3.0 Maintain adequate domestic water supplies for all residents and uses within the City.

Policy 3.1 The City should encourage the use of drought-resistant vegetation and encourage the use of recycled water for irrigation for both private development as well as public projects and facilities.

Policy 3.2 The City shall encourage the development and utilization of innovative water conservation measures in all proposed developments.

Policy 3.3 The City should continue to support the Padre Dam Municipal Water District in expanding the water reclamation facility to its ultimate capacity and support the expansion of recycled water infrastructure.

Policy 3.4 The City should encourage the Padre Dam Municipal Water District to satisfy both existing and planned potable water and recycled water demands within the City and District service area prior to considering out-of-district contracts and agreements.

4.13.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to utilities and service systems are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to utilities and service systems would occur if the Project would:

A. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
B. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.
C. Result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.
D. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
E. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.13.4 Impacts Analysis

A. Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Construction of New Utility Lines

Less-than-Significant Impact. As discussed above in Section 4.13.1, Existing Conditions, existing utility service lines are located within the vicinity of the Project site. As part of the Project, utility service lines, including those for water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications services would be reconfigured from their current locations on and nearby the Project site to the proposed building. The following discussion provides a summary of Project utility work.

- **Water.** As discussed in Section 4.13.1, Existing Conditions, there is an existing water line within N. Woodside Avenue. The Project would connect to the existing 12-inch diameter watermain within N. Woodside Avenue by removing and replacing an existing segment of 12-inch diameter water main with new, 16-inch water main. From this 16-inch main, the Project would install laterals that would serve 2" domestic service, 2" landscape service, and a looped 12-inch fire service providing service to the building's fire sprinkler system and on-site fire hydrants.
- **Sanitary Sewer.** Sanitary sewer service would be provided by the Padre Dam Municipal Water District. The Project would connect to the existing sewer manhole cover within the Project Driveway by installing a 6-inch diameter lateral connection.
- **Stormwater.** As discussed in Section 4.13.1, Existing Conditions, stormwater currently sheet flows over the parking lot to a low spot in the northwest corner of the site and overflows into the San Diego River over natural terrain. The sheet flow includes off-site water from an existing 24-inch culvert that originates from

under CA-67 to the south of the Project. This culvert outlets at the entrance of the site, near the southern terminus of the driveway at N. Woodside Avenue. The culvert collects water from approximately 2.8 acres of tributary area from the southern side of the CA-67 that then flows through the culvert and across the Project site's natural topography to the San Diego River. The Project's storm drain improvements include intercepting the existing 24-inch culvert and installing an extension to the San Diego River to the north of the project site. This extension would bypass the proposed on-site storm drain system serving the Project and would maintain the existing drainage pattern for the 2.8-acre tributary area, consistent with the proposed design plan.

- The Project would include development of an on-site storm drain system that would accept flows from drain inlets at low spots throughout the site. This stormwater would be directed to subterranean infiltration and retention chambers located in the northern truck court. In a major storm event, overflow would occur via a pipe outlet into the San Diego River. A rip-rap pad at the outlet would provide energy dissipation and would prevent slope scour and erosion.
- **Electric Power.** As discussed in Section 4.13.1, Existing Conditions, the Project site is currently served by SDG&E and several above-ground and underground electrical lines which are located adjacent to the Project site and adjacent streets. Several SDG&E poles would be removed and replaced as part of the Project. Additionally, all above-ground electrical lines within the Project site would be undergrounded.
- **Natural Gas.** There is currently no gas service to the Project site, and the Project does not include plans to install new gas service.
- **Telecommunications.** Several proprietary telecommunication lines are located adjacent to the Project site. As part of the Project, lateral connections would be made to these existing, electric, and telecommunication lines.

Given that the activity of reconfiguring the existing utility lines would involve ground disturbance and the use of heavy machinery associated with trenching, the installation of these utility service lines could potentially result in environmental effects. For example, construction equipment would emit air quality pollutants and greenhouse gas emissions, trenching and excavation could potentially destroy cultural and tribal cultural resources if located within the subsurface, and the disturbance of soils could potentially result in an increased potential for erosion or for disturbed soils to enter into downstream waters. However, the extension of these utility service lines, including their disturbance footprints and construction techniques, as well as their associated impacts, is part of the Project analyzed herein. As such, any potential environmental impacts related to these components, such as those described above, are already accounted for in this Draft EIR as part of the impact assessment conducted for the entirety of the Project. Additionally, the Project would be required to comply with all regulatory requirements and mitigation measures outlined within this Draft EIR for the purposes of lessening or mitigating impacts associated with trenching activities and the use of heavy machinery. For example, as described in Section 5, Effects Found Not To Be Significant, of this Draft EIR, Project construction would occur in accordance with the requirements of the NPDES General Construction Permit and the Santee Municipal Code, which require the implementation of BMPs and pollutant control measures to minimize pollutants and reduce runoff to levels that comply with applicable water quality standards. The Project would not require the construction, expansion, or relocation of water, wastewater, stormwater drainage facilities, electric power, natural gas, and telecommunications facilities beyond those facilities identified above, as existing facilities are in-place and adequately sized to accommodate the Project. Therefore, no adverse physical effects beyond those already disclosed in this Draft EIR would occur as a result of implementation of the Project's proposed utility system connections. Impacts would be **less than significant**.

Capacity of Water, Wastewater Treatment, Storm Water Drainage, Electric Power, Natural Gas, and Telecommunications Facilities

Less-than-Significant Impact.

Water Conveyance and Treatment Facilities

The water conveyance facilities in the Project area are adequately sized to accommodate the Project. According to Appendix M, upsizing the existing segment of 12-inch diameter water main with new, 16-inch water main would meet fire flow requirements. Additionally, the Project would not require the installation or expansion of off-site facilities beyond those described above. With regard to water treatment facilities, as discussed under Threshold 4.13B, the Project's water demand would not result in or require new or expanded water supplies beyond those that are anticipated within the PDMWD 2015 and 2020 UWMPs. As such, implementation of the Project would not result in the need to expand water treatment facilities. Therefore, impacts associated with water treatment facilities would be **less than significant**.

Wastewater Conveyance and Treatment Facilities

The wastewater conveyance facilities in the Project area are adequately sized to accommodate the Project and would not require the installation or expansion of off-site facilities beyond those described above. With regard to wastewater treatment facilities, as discussed in Threshold 4.13C, the Project would generate a nominal amount of wastewater in the context of the available capacity of PDMWD wastewater treatment facilities Based on the remaining treatment capacity, impacts associated with wastewater conveyance and treatment facilities would be **less than significant**.

Stormwater Drainage Facilities

The Preliminary Hydrology Report calculated peak runoff rates for the 10-year, 50-year, and 100-year storm events, including on-site runoff and off-site run-on. Based on these calculations, post-construction runoff rates would be less than under existing conditions for each storm event (Appendix J-1). As such, the Project's stormwater system would contribute less stormwater to the San Diego River and the existing culvert when compared to the existing conditions. According to the Preliminary Hydrology Report, all flows will be routed to an underground infiltration chamber in compliance with the County of San Diego Low Impact Development requirements. Therefore, impacts associated with stormwater drainage facilities would be **less than significant**.

Electric Power

Electric service is currently provided by SDG&E and several above ground and underground electrical lines are located adjacent to the Project site and adjacent streets. Several SDG&E poles would be removed and replaced as part of the Project. Additionally, all above-ground electrical lines within the Project site would be undergrounded. Impacts would be **less than significant**.

Telecommunications

The Project would involve lateral connections to the existing telecommunication facilities. These facilities are adequately sized and would not require the installation or expansion of off-site facilities beyond those described above. Impacts would be **less than significant**.

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?

Less-than-Significant Impact. Implementation of the Project would result in the construction of an industrial warehouse with associated office spaces, surface parking, and loading areas.

According to CalEEMod (Appendix B of this Draft EIR), the proposed Project is estimated to result in an increase in potable water demand of 97,145 gallons per day (gpd), which is equivalent to approximately 108.8 acre-feet per year (AFY).

The 2020 PDMWD UWMP has planned for growth within its service area through their planning horizons (i.e., 20 years). As an urban water supplier, PDMWD is required to assess the reliability of its water supply service under a multiple-dry-year scenario. Based on historical extraction and estimated population growth rates, the projected water supply and demand for the single- and multiple-dry-year scenarios were calculated for the 2015 and 2020 UWMPs. As provided above in Table 4.13-1, PDMWD anticipates that has sufficient water supply to meet current and projected water demands through 2045 during normal-, historic single-dry-, and historic multiple-dry-year periods. These projections are based on a land use-based demand model that accounts for a variety of factors, including the land use plans of jurisdictions within PDMWD's service area. The Project is consistent with the existing land use designation and zoning of the site.

Given that PDMWD has adequate existing supplies to serve the Project under normal-, historic single-dry-, and historic multiple-dry-year periods, the Project's impact to water supply would be **less than significant**.

C. Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

Less-Than-Significant Impact. Wastewater generated by the Project would be treated at either the WRF or the PLF, which collectively have the capacity to treat 242 mgd of wastewater and treats, on average, 177 mgd of wastewater. Project operations are conservatively estimated to generate approximately 97,145 gallons per day, or 0.097 mgd. (The Project's wastewater demand mirrors the water demand for Project operations and is conservative because Project operations include water use for landscape irrigation, which does not flow into the sewer system or require wastewater treatment). Projected wastewater from the Project would represent approximately 0.15% of the remaining capacity of the WRF and PLF treatment facilities. Given the remaining capacity of the WRF and PLF treatment facilities, the WRF and PLF would be able to accommodate the Project's contribution of 0.097 mgd of wastewater. Therefore, impacts associated with wastewater treatment capacity would be **less than significant**.

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?

Short-Term Construction Impacts

Less-Than-Significant Impact. Based on a review of the current structures located on the site, demolition activities are anticipated to generate approximately 18,381 tons of demolition materials (See Section 4.2, Air Quality). Waste also would be generated by the construction process, primarily consisting of discarded materials and packaging. Based on a proposed building area of 300,145 square feet and a construction waste generation factor of 4.34 pounds per square foot (EPA 2009), approximately 651.3 tons of waste would be generated over the course of the

Project's construction phase ([300,145 sq. ft. × 4.34 pounds/square foot] ÷ 2,000 pounds/ton = 651.3 tons). In total, the Project would generate 19,032 tons of waste during construction (18,381 tons of demolition debris + 651.3 tons of construction waste = 19,032 tons).

As mentioned above, CALGreen requires that a minimum of 65% of all solid waste be diverted from landfills (by recycling, reusing, and other waste reduction strategies) consistent with the State's solid waste reduction goals; therefore, approximately 12,371 tons of construction waste would be diverted (19,032 tons × 65% = 12,371 tons). The remaining 6,661 tons of construction and demolition materials (19,032 tons × 35% = 6,661 tons) that is currently not required to be recycled, would either be disposed of or voluntarily recycled at a solid waste facility with available capacity.

Table 4.13-2, Construction Waste Summary, summarizes the amount of waste that would be generated, diverted, and landfilled during Project construction.

Table 4.13-2. Construction Waste Summary

	Size	Generation Rate (Tons/SF)	Waste Generated (Tons)	Waste Diverted (Tons)	Waste Landfilled (Tons)
Demolition	—	—	18,381	11,948	6,433
Construction	300,145 SF	4.34	651.3	423	228
		Total	**19,032**	**12,371**	**6,661**

Source: Appendix B and EPA 2009.
Note: SF = Square Feet

The Project's demolition debris would be hauled from the site over the course of the Project's demolition phase, which would last approximately one month (25 working days). This would correspond to approximately 257.3 tons of demolition waste per day of construction activity. The Project's building construction would occur over a period of approximately 10 months (202 working days), which corresponds to approximately 1.13 tons of construction waste being generated per day of construction activity. As previously described, the Sycamore Landfill accepts inert solid waste, has a daily maximum permitted throughput of 5,000 tons/day, has a remaining capacity of 113,972,637 cubic yards, and is expected to remain open for another 18 years (CalRecycle 2019). Therefore, the Project's daily peak demolition and construction waste delivery of 258.4 tons could be received by the Sycamore Landfill. Therefore, Project demolition and construction would not 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. Impacts during construction would be **less than significant**.

Long-Term Operational Impacts

Less-Than-Significant Impact. Once operational, the Project would produce solid waste on a regular basis associated with operation and maintenance activities. Using CalEEMod waste generation factors for the Industrial Park and Warehouse uses, the Project would generate approximately 141 tons of solid waste per year, or 0.4 tons per day (Appendix B). A minimum of 50% of all solid waste would be required to be recycled pursuant to AB 939, consistent with the State's solid waste reduction goals; therefore, the Project would generate approximately 0.2 tons per day of solid waste requiring disposal at a landfill.

As previously described in Section 4.13.1, Waste Management Inc. provides solid waste collection and disposal within the City. Waste would likely be hauled to the Sycamore Landfill. The Sycamore Landfill has a permitted

throughput of 5,000 tons/day and is expected to remain open for another 18 years. The increase of waste generated by the Project during operations would represent approximately 0.004% of the total daily capacity of permitted at the landfill.

Once the Sycamore Landfill reaches capacity, additional landfills and strategies would be identified, so that disposal needs continue to be met. Further, there are landfills within the County with up to 35 years of remaining life. For example, the Las Pulgas Landfill is expected to remain open another 35 years (CalRecycle 2023). As such, in the event of the closure of the Sycamore Landfill, other landfills in the region would be able to accommodate solid waste from the Project, and regional planning efforts would ensure continued landfill capacity in the foreseeable future. Therefore, the Project would not 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. Impacts during operation would be **less than significant**.

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

Less-Than-Significant Impact. As described above, solid waste from the Project would be transported to the Sycamore Landfill. This facility is regulated under federal, state, and local laws. Additionally, the City of Santee is required to comply with the solid waste reduction and diversion requirements set forth in AB 939, AB 341, AB 1327, and AB 1826. Per AB 341, businesses that generate 4 cubic yards or more of organic waste per week are required to arrange for organic waste recycling services. In addition, as preciously described, waste diversion and reduction during Project construction and operations would be completed in accordance with CALGreen standards and City diversion standards. As a result, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste and impacts would be considered **less than significant**.

4.13.5 Mitigation Measures and Level of Significance After Mitigation

All impacts related to utilities and services systems would be less than significant. No mitigation is required.

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4.14 Wildfire

This section describes the existing wildfire conditions of the Palisade Santee Commerce Center Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if necessary to reduce or avoid significant impacts, related to implementation of the proposed Project. Potential wildfire impacts resulting from construction and operation of the Project were evaluated based on a review of existing resources and applicable laws, regulations, guidelines, and standards. Additionally, this Environmental Impact Report (EIR) discusses the Fire Protection Plan (FPP) prepared for this Project and included as Appendix N. This section focuses on the effect of the Project on wildfire risk. Impacts to public services are further discussed in Section 4.11, Public Services.

4.14.1 Existing Conditions

Wildfire is a continuous threat in Southern California and is particularly concerning in the wildland-urban interface, the geographic area where urban development either abuts or intermingles with wildland or vegetative fuels. During the summer season, dry vegetation, prolonged periods of drought, and Santa Ana wind conditions can combine to increase the risk of wildfires in the County.

Fire History

The Project area, like all of San Diego County, is subject to seasonal weather conditions that can heighten the likelihood of fire ignition and spread. Fire history is an important component of a wildfire analysis. Wildfire history information can provide an understanding of fire frequency, fire type, most vulnerable project areas, and significant ignition sources, amongst others. The California Department of Forestry and Fire (CAL FIRE) maintains the Fire and Resource Assessment Program database, which was used to evaluate the Project site's fire history to determine whether large fires have occurred in the project area, and thus the likelihood of future fires. Per the recorded fire history database, which dates back to 1900, the site has not been subject to wildfire (CAL FIRE 2022). Multiple fires have occurred within 5-miles of the Project site, and recorded wildfires within 5 miles of the Project site range from 75 acres (Lakeside fire in 1980) to 270,686 acres (Cedar fire in 2003).

Fire Hazard Mapping

CAL FIRE's Fire and Resource Assessment Program database also includes map data documenting areas of significant fire hazards in the state. These maps categorize geographic areas of the state into different Fire Hazard Severity Zones (FHSZs), ranging from moderate to very high. CAL FIRE uses FHSZs to classify anticipated fire-related hazards for the entire state, and includes classifications for State Responsibility Areas (SRAs), Local Responsibility Areas (LRAs), and Federal Responsibility Areas (FRAs). Fire hazard severity classifications take into account vegetation, topography, weather, crown fire production, and ember production and movement. As shown in Figure 4.14-1, Fire Hazard Severity Zones, the Project site is not within a Very High Fire Hazard Severity Zone (VHFHSZ), but there is a VHFHSZ within an LRA located directly adjacent to the Project site to the north and east (CAL FIRE 2023).

Vegetation Communities and Land Covers

Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin

content), biological function (flowering, retention of dead plant material), physical structure (leaf size, branching patterns), and overall fuel loading.

A critical factor to consider is the dynamic nature of vegetation communities. Fire presence and absence at varying cycles or regimes affect plant community succession. Succession of plant communities, most notably the gradual conversion of shrublands to grasslands with high frequency fires and grasslands to shrublands with fire exclusion, is highly dependent on the fire regime. Further, biomass and associated fuel loading will increase over time if disturbance or fuel reduction effects are not diligently implemented.

The vegetation types and land covers in the Project area were identified during field assessments conducted for the Project site. As detailed in Section 4.3, Biological Resources, the Project site is characterized by Non-native Grassland, Non-native Woodland, Disturbed Habitat, and Urban/Developed Land. Figure 4.3-1 of this EIR illustrates the distribution of vegetation communities and land covers in the study area.

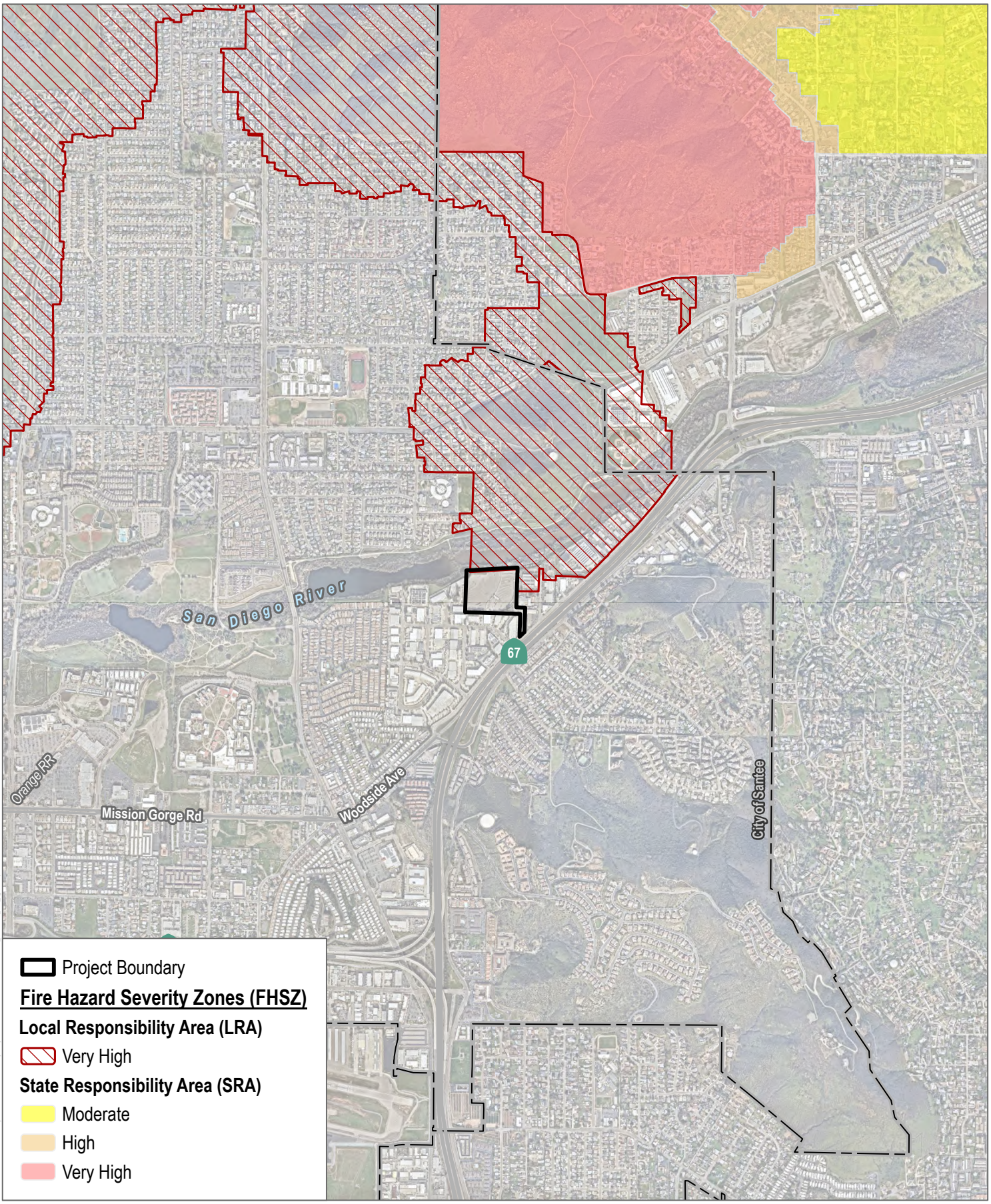
Topography/Terrain

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up-slope and slower spread down-slope. Terrain that forms a funneling effect, such as chimneys, chutes, or saddles on the landscape can result in especially intense fire behavior, including faster spread and higher intensity. Conversely, flat terrain tends to have little effect on fire spread, resulting in fires that are driven by vegetation and wind. The Project site is relatively flat and primarily consists of previously disturbed land, non-native grassland, and non-native woodland. The San Diego River is located down-slope of the Project site to the north.

Climate, Weather and Wind

In the City of Santee, the summers are short, hot, arid, and mostly clear, and the winters are long, cool, and partly cloudy. During summer months (July through September), the average daily high temperature is above 84°F, and during the cooler, winter months (November through April), the average daily high temperature is below 72°F. The temperature varies throughout the year but is rarely below 34°F or above 97°F. Like much of Southern California, Santee experiences seasonal variation in monthly rainfall throughout the year, with the wetter months lasting from November through April.

The Project site, like much of Southern California, is influenced by prevailing wind patterns. Prevailing winds are winds that blow from a single direction over a specific area of the Earth. The predominant average hourly wind speed and direction in Santee varies throughout the year. The wind is most often from the west for 10 months, and the wind is most often from the east from late November to early February. The windier part of the year lasts for approximately 7 months (November to June), with average wind speeds of more than 7.0 miles per hour (WeatherSpark 2023).



SOURCE: SANGIS Imagery 2023, Open Street Maps, CalFIRE FHSZ SRA 2007, LRA 2009

DUDEK

0 500 1,000 2,000 Feet

FIGURE 4.14-1

Fire Hazard Severity Zones

Palisade Santee Commerce Center Project

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Emergency Response

As referenced in the Project's Fire Protection Plan (FPP) (see Appendix N of this Draft EIR), the Project site is located within the Santee Fire Department's (SFD) jurisdictional response area. SFD currently operates two fire stations (Stations 4 and 5) with 53 uniformed personnel. Generally, each agency is responsible for structural fire protection and wildland fire protection within their area of responsibility. However, mutual aid agreements enable non-lead fire agencies to respond to fire emergencies outside their district boundaries. In the Project area, fire agencies cooperate on a statewide master mutual aid agreement for wildland fires and there are mutual aid agreements in place with neighboring fire agencies and typically include interdependencies that exist among the region's fire protection agencies for structural and medical responses but are primarily associated with the peripheral "edges" of each agency's boundary. These agreements are voluntary, as no local governmental agency can exert authority over another.

SFD Fire Station 4, which is located at 8950 Cottonwood Avenue approximately 1.5 miles from the Project site, is the closest SFD station to the Project site and would likely be the first to respond. Station 4 is staffed by nine full-time fire personnel. SFD Station 5, located at 9130 Carlton Oaks Drive, is the next closest fire station to the Project site, located approximately 4.6 miles from the project site. SFD Station 5 is staffed by eight full-time fire personnel. Station 5 is equipped with one (1) Type 1 Paramedic Fire Engine and one (1) Rescue Ambulance.

4.14.2 Relevant Plans, Policies, and Ordinances

Federal

National Fire Protection Association Codes, Standards, Practices, and Guides

National Fire Protection Association codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. This process brings together professionals representing varied viewpoints and interests to achieve consensus on fire and other safety issues. National Fire Protection Association standards are recommended guidelines and nationally accepted good practices in fire protection but are not laws or codes unless adopted as such or referenced as such by the California Fire Code (CFC) or the local fire agency.

Federal Wildland Fire Management Policy

The Federal Wildland Fire Management Policy was developed in 1995, updated in 2001, and again in 2009 by the National Wildfire Coordinating Group, a federal multi-agency group that establishes consistent and coordinated fire management policy across multiple federal jurisdictions. An important component of the Federal Wildland Fire Management Policy is the acknowledgment of the essential role of fire in maintaining natural ecosystems. The Federal Wildland Fire Management Policy and its implementation are founded on the following guiding principles, found in the Guidance for Implementation of Federal Wildland Fire Management Policy (National Wildfire Coordinating Group 2009):

- Firefighter and public safety is the first priority in every fire management activity.
- The role of wildland fire as an essential ecological process and natural change agent will be incorporated into the planning process.
- Fire management plans, programs, and activities support land and resource management plans and their implementation.

- Sound risk management is a foundation for all fire management activities.
- Fire management programs and activities are economically viable, based upon values to be protected, costs, and land and resource management objectives.
- Fire management plans and activities are based upon the best available science.
- Fire management plans and activities incorporate public health and environmental quality considerations.
- Federal, state, tribal, local, interagency, and international coordination and cooperation are essential.
- Standardization of policies and procedures among federal agencies is an ongoing objective.

National Fire Plan

The National Fire Plan, officially titled Managing the Impacts of Wildfire on Communities and the Environment: A Report to the President In Response to the Wildfires of 2000, was a presidential directive in 2000 as a response to severe wildland fires that had burned throughout the United States. The National Fire Plan focuses on reducing fire impacts on rural communities and providing assurance for sufficient firefighting capacity in the future. The plan addresses five key points: firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability. The plan provides technical, financial, and resource guidance and support for wildland fire management across the United States. The U.S. Department of Agriculture and the Department of the Interior are working to successfully implement the key points outlined in the plan (DOI/USDA 2000).

International Fire Code

Created by the International Code Council, the International Fire Code (IFC) addresses a wide array of conditions hazardous to life and property, including fire, explosions, and hazardous materials handling or usage (although not a federal regulation, but rather the product of the International Code Council). The International Fire Code places an emphasis on prescriptive and performance-based approaches to fire prevention and fire protection systems. Updated every 3 years, the International Fire Code uses a hazards classification system to determine the appropriate measures to be incorporated to protect life and property (often times these measures include construction standards and specialized equipment). The International Fire Code uses a permit system (based on hazard classification) to ensure that required measures are instituted (International Code Council 2017).

State

California Government Code

California Government Code Sections 51175 through 51189 provide guidance for classifying lands in California as fire hazard areas and requirements for management of property within those lands. CAL FIRE is responsible for classifying FHSZs based on statewide criteria and makes the information available for public review. Further, local agencies must designate, by ordinance, VHFHSZs within their jurisdiction based on the recommendations of CAL FIRE.

Section 51182 sets forth requirements for maintaining property within fire hazard areas, such as defensible space, vegetative fuels management, and building materials and standards. Defensible space around structures in fire hazard areas must consist of 100 feet of fuel modification on each side of a structure, but not beyond the property line unless findings conclude that the clearing is necessary to significantly reduce the risk of structure ignition in the event of a wildfire. Clearance on adjacent property shall only be conducted following written consent by the adjacent owner. Further, trees must be trimmed from within 10 feet of the outlet of a chimney or stovepipe,

vegetation near buildings must be maintained, and roofs of structures must be cleared of vegetative materials. Exemptions may apply for buildings with an exterior constructed entirely of nonflammable materials.

California Code of Regulations

Title 14 Natural Resources

Title 14, Division 1.5, Chapter 7, Subchapter 3, Fire Hazard, also sets forth requirements for defensible space if the distances specified above cannot be met. For example, options that have similar practical effects include noncombustible block walls or fences, 5 feet of noncombustible material horizontally around the structure, installing hardscape landscaping or reducing exposed windows on the side of the structure with a less-than-30-foot setback, or additional structure hardening such as those required in the California Building Code (CBC), California Code of Regulations Title 24, Part 2, Chapter 7A.

Title 24 California Building Standards Code

California Building Code

Part 2 of Title 24 contains the California Building Code (CBC). Chapter 7A of the CBC regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a fire hazard area. Fire hazard areas as defined by the CBC include areas identified as a FHSZ within an SRA or a wildland–urban interface fire area. The purpose of Chapter 7A is to establish minimum standards for the protection of life and property by increasing the ability of structures located in a fire hazard area to resist the intrusion of flames or burning embers projected by a wildfire, and to contribute to a systematic reduction in structural losses from a wildfire. New buildings located in such areas must comply with the ignition-resistant construction standards outlined in Chapter 7A.

California Fire Code

Part 9 of Title 24 contains the California Fire Code (CFC), which incorporates by adoption the International Fire Code with necessary California amendments. The purpose of this code is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas.

The CFC and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The CFC is updated and published every 3 years by the California Building Standards Commission. The 2022 CFC took effect on January 1, 2023. The City adopted the 2022 CFC with local amendments in November 2022.

California Public Resources Code

California Public Resource Code, Section 4290, requires minimum fire safety standards related to defensible space that are applicable to residential, commercial, and industrial building construction in SRA lands and lands classified and designated as VHFHSZs. These regulations include road standards for fire apparatus access, standards for signs identifying roads and buildings, fuel breaks and green belts, and minimum water supply requirements. It

should be noted that these regulations do not supersede local regulations which equal or exceed minimum regulations required by the state.

California Public Resource Code, Section 4291, requires a reduction of fire hazards around buildings located adjacent to a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered in flammable material. It is required to maintain 100 feet of defensible space around all sides of a structure, but not beyond the property line unless required by state law, local ordinance, rule, or regulations. Further, California Public Resource Code, Section 4291 requires the removal of dead or dying vegetative materials from the roof of a structure, and trees and shrubs must be trimmed from within 10 feet of the outlet of a chimney or stovepipe. Exemptions may apply for buildings with an exterior constructed entirely of nonflammable materials.

Fire Hazard Severity Zones

CAL FIRE maps FHSZs based on fuel loading, slope, fire history, weather, and other relevant factors as directed by California Public Resources Code, Sections 4201–4204, and California Government Code Sections 51175–51189. FHSZs are ranked from Moderate to Very High and are categorized for fire protection within an FRA, SRA, or LRA under the jurisdiction of a federal agency, CAL FIRE, or local agency, respectively. The Project site is within an LRA but not within a FHSZ, and is adjacent to a Moderate and VHFHSZ to the northeast in an SRA. The nearest VHFHSZ in an LRA is located immediately north of the Project site (CAL FIRE 2023; CAL FIRE 2009).

California Strategic Fire Plan

The 2018 Strategic Fire Plan for California reflects CAL FIRE's focus on fire prevention and suppression activities to protect lives, property, and ecosystem services, and natural resource management to maintain the state's forests as a resilient carbon sink to meet California's climate change goals and to serve as important habitat for adaptation and mitigation. The Strategic Fire Plan for California provides a vision for a natural environment that is more fire resilient, buildings and infrastructure that are more fire resistant, and a society that is more aware of and responsive to the benefits and threats of wildland fire, all achieved through local, state, federal, tribal, and private partnerships (CAL FIRE 2018). Plan goals include the following:

1. Identify and evaluate wildland fire hazards and recognize life, property and natural resource assets at risk, including watershed, habitat, social and other values of functioning ecosystems. Facilitate the collaborative development and sharing of all analyses and data collection across all ownerships for consistency in type and kind.
2. Promote and support local land use planning processes as they relate to: (a) protection of life, property, and natural resources from risks associated with wildland fire, and (b) individual landowner objectives and responsibilities.
3. Support and participate in the collaborative development and implementation of local, county and regional plans that address fire protection and landowner objectives.
4. Increase fire prevention awareness, knowledge and actions implemented by individuals and communities to reduce human loss, property damage and impacts to natural resources from wildland fires.
5. Integrate fire and fuels management practices with landowner/land manager priorities across jurisdictions.
6. Determine the level of resources necessary to effectively identify, plan and implement fire prevention using adaptive management strategies.
7. Determine the level of fire suppression resources necessary to protect the values and assets at risk identified during planning processes.

8. Implement post-fire assessments and programs for the protection of life, property, and natural resource recovery.

Mutual Aid Agreements

The California Disaster and Civil Defense Master Mutual Aid Agreement, as provided by the California Emergency Services Act, provides statewide mutual aid between and among local jurisdictions and the state. The statewide mutual aid system exists to ensure that adequate resources, facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given situation. Each jurisdiction controls its own personnel and facilities but can give and receive help whenever needed.

Local

California Disaster and Civil Defense Master Mutual Aid Agreement

As provided for in the California Emergency Services Act, this agreement was developed in 1950 and adopted by all 58 California counties. This statewide mutual aid system is designed to ensure that adequate resources, facilities, and other support are provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation. San Diego County is located in Mutual Aid Region 6 of the state system, which also includes Imperial, Riverside, San Bernardino, Inyo, and Mono counties.

San Diego County Emergency Operations Plan

The San Diego County Emergency Operations Plan is a comprehensive emergency management system that provides for a planned response to disaster situations associated with natural disasters, technological incidents and nuclear defense operations. The Plan includes operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the population. The plan also identifies the source of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies and the private sector.

San Diego County Multiple- Jurisdictional Hazard Mitigation Plan

The purpose of the County's Multi-Jurisdictional Hazard Mitigation Plan (County of San Diego 2017) is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-made hazards. An important San Diego County Multi-Jurisdictional Hazard Mitigation Plan component is the Community Emergency Response Team (CERT), which educates community members about disaster preparedness and trains them in basic response skills, including fire safety.

Santee General Plan

Safety Element

The purpose of the Safety Element is to reduce loss of life, injuries, and damage to property resulting from natural and human-caused public safety hazards including flooding, geologic and seismic hazards, fire, traffic hazards and crime. The following goals and policies are applicable:

Goal 4.0 Minimize injuries, loss of life and property damage resulting from fire hazards

Policy 4.1 Proposed developments should be approved only after it is determined that there will be adequate water pressure to maintain the required fire flow at the time of development.

Policy 4.2 The City should ensure that all new development meets established response time standards for fire and life safety services.

Policy 4.3 The City shall require the installation of fire hydrants and establishment of emergency vehicle access, before construction with combustible materials can begin on an approved project.

Policy 4.4 The City shall require emergency access routes in all developments to be adequately wide to allow the entry and maneuvering of emergency vehicles.

Policy 4.5 The City should support State legislation that would provide tax incentives to encourage the repair or demolition of structures that could be considered fire hazards.

Policy 4.6 The City should support the continuation of the existing weed abatement program.

Policy 4.7 The City shall ensure that the distribution of fire hydrants and capacity of water lines is adequate through periodic review.

Policy 4.8 Encourage and support the delivery of a high level of emergency services through cooperation with other agencies and use of available financial opportunities.

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.

Policy 4.10 Encourage the continued development, implementation and public awareness of fire prevention programs.

Policy 4.11 In order to minimize fire hazards, the Santee Fire and Life Safety Department shall routinely be involved in the review of development applications. Considerations shall be given to adequate emergency access, driveway widths, turning radii, fire hydrant locations and needed fire flow requirements.

Policy 4.12 The timing of additional fire station construction or renovation, or new services shall relate to the rise of service demand in the City and surrounding areas.

Policy 4.13 Support mutual aid agreements and communications links with County and the other municipalities participating in the Unified San Diego County Emergency Service Organization.

4.14.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to wildfire are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact

related to wildfire would occur if a Project located in or near SRAs or lands classified as very high fire hazard severity zones would:

A. Substantially impair an adopted emergency response plan or emergency evacuation plan.
B. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
C. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
D. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

4.14.4 Impacts Analysis

The Project site is not located in SRA lands or lands classified as VHFHSZ. However, LRA lands classified as VHFHSZs are located immediately north and east of the Project site. Additionally, there are SRA lands classified as very high less than a mile northeast of the project site.

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

Less-than-Significant Impact**.** As discussed in Section 4.12, Transportation, access to the Project site would be designed such that adequate emergency access would be provided in accordance with emergency apparatus access requirements. Access to the Project site would be provided via North Woodside Avenue. As mentioned in the Project's Fire Protection Plan (FPP) (Appendix N of this EIR), the existing driveway currently bordering the east and south side of the Project site would be extended to loop around the entire Project site and widened to 60 feet in order to allow fire lane access from all sides of the building. Consistent with the Santee Fire Department access requirements, all Project driveways have been designed to allow for minimum turning radii. Signage and striping would be provided to demarcate fire lanes and clear spaces throughout the site. All gated entryways would include rapid-access Knox boxes to provide emergency access to gated areas. Additionally, road improvements would be constructed to current Fire Codes and City of Santee standards for public and private roads.

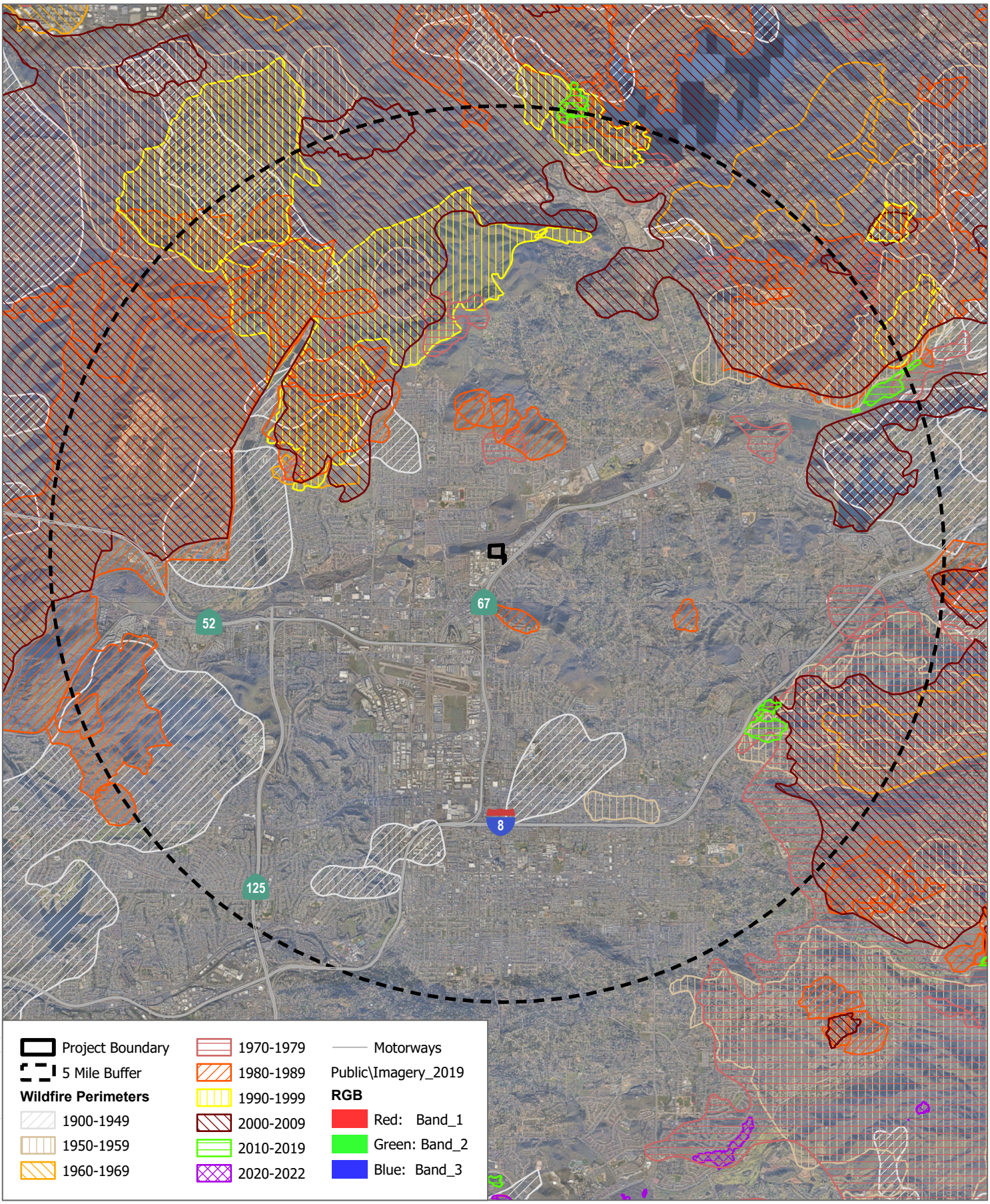
Emergency response to the Project site would be provided by the Santee Fire Department, San Diego County Sheriff's Department, and other responsible agencies. The SFD's response times vary within the City, with the current goal being to provide an average maximum initial response time of no more than six minutes, with an average maximum response time of no more than ten minutes for supporting paramedic transport units 90% of the time (City of Santee 2003). The response time for fire department emergency response to the Project site can be calculated using the National Fire Protection Association (NFPA) 1710 and Insurance Services Office Public Protection Classification Program's Response Time Standard formula (Time=0.65 + 1.7(Distance). Travel distances are derived from Google road data while travel times are calculated using response speeds of 35 mph. The Insurance Services Office response travel time formula discounts speed for intersections, vehicle deceleration and acceleration, and does not include turnout time. Automatic and/or Mutual Aid agreements with surrounding fire departments are in place and would potentially result in additional resources that are not analyzed herein.

SFD Station 4 is the closest fire station to the Project site and would likely be the first to respond. SFD Station 4 is approximately 1.5-mile from the entrance to the Project site and could respond to an incident within an approximately 3.2-minute travel time. In the event that Fire Station No. 4 could not meet the immediate needs of a call for services independently or does not have capability to address the full extent of a larger incident, the second closest station, Fire Station No. 5, is located approximately 4.6 miles from the Project site or other fire stations within the Santee-Lakeside joint exercise of powers agreement as well as the County's mutual aid agreement, as well as CAL FIRE, could respond or provide support (City of Santee 2023).

San Diego County's Hazard Mitigation Plan includes resources and information to assist county residents, public and private sector organizations, and others interested in participating in planning for natural hazards (County of San Diego 2023). As they relate to the Project, the mitigation objectives and actions outlined in the Hazard Mitigation Plan would require that the Project be designed and constructed in accordance with the current California Building and Fire Codes (and local amendments) would ensure that the Project is compliant with fire inspection standards and weed abatement to reduce the potential for vegetation fires (County of San Diego 2023). The Project would comply with all County, state, and local requirements related to fire safety, and the Project would comply with all requirements outlined in the Hazard Mitigation Plan.

Furthermore, the City is part of San Diego County Emergency Operations Plan (EOP), which discusses evacuation procedures in the event of an emergency. As stated in the EOP, primary evacuation routes consist of the major interstates and prime arterials. In the event of a wildfire, the City, in cooperation with Santee Fire Department, would utilize the County's public notification systems and provide evacuation instructions. Emergency response to the Project site would be serviced by the Santee Fire Department, San Diego County Sheriff's Department, and other responsible agencies. The City does not have any designated evacuation routes, although Interstate 67 is designated in the County's General Plan Safety Element and the County's Emergency Operations Plan as an evacuation route and is less than a mile from the Project site (County of San Diego 2022). North Woodside Avenue is just south of the Project site. and is a major north-south arterial. Additionally, the Project site is located in the southeastern part of the City, which sits in a transportation corridor formed by Interstates 52 and 67.

As referenced in Section 4.7 Hazards and Hazardous Materials, the proposed Project may result in a temporary increase in traffic on roadways surrounding the Project site due to increased truck loads or the transport of construction equipment to and from the Project site during the construction period. All construction activities including staging would occur in accordance with City requirements which would ensure that adequate emergency access would be provided during construction of the Project. Further, as shown in Figure 4.14-2, Wildfire History, wildfires in the City and surrounding areas have occurred in all directions around the project site, with the most recent fires between 2020-2022 happening 7 miles south of the project site. In the event that prevailing winds fan a fire so that it moves toward the Project site, evacuation of the potentially affected communities may be required. In general, evacuees would take roads leading west toward the city boundary and toward El Cajon. With compliance with City and SFD requirements, the Project would not conflict with or impair implementation of the Hazard Mitigation Plan, and the County's Emergency Operations Plan nor would the Project impair use of potential evacuation routes in the City, and impacts would be **less than significant**.



SOURCE: SanGIS, Open Street Maps, CDF2022

FIGURE 4.14-2

Fire History

Palisade Santee Commerce Center Project

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B. Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less-than-Significant Impact. The Project site is not located in SRA lands or lands classified as VHFHSZ. However, the nearest VHFHSZ in the SRA is located less than 1 mile northeast of the Project site. Additionally, the Project site is adjacent to land to the northeast classified as VHFHSZ within the LRA. The Project could exacerbate wildfire risk and expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire if the Project, combined with the climatic, topographic, vegetation, weather conditions, and other factors, would increase the risk of a wildfire occurring and increase the severity of such an occurrence.

Short-Term Construction Impacts

Construction of the Project would introduce potential ignition sources to the Project site, including the use of heavy machinery and the potential for sparks during welding activities or other hot work. However, the Project would be required to comply with City and state requirements for fire safety practices, to reduce the possibility of fires during construction activities. Further, vegetation would be removed from the site prior to the start of construction. Adherence to City and state regulatory standards during Project construction would reduce the risk of wildfire ignition and spread during construction activities. Thus, short-term construction impacts associated with exacerbating wildfire risk would be **less than significant**.

Long-Term Operational Impacts

Slope

As discussed in the Geotechnical Report (Appendix G of this EIR), the Project site and surrounding area are relatively flat. The Project site contains mainly 0 to 2 percent slopes consisting of Visalia sandy loam soils and Riverwash (NorCal Engineering 2024). Upon Project implementation, the portions of the site that would be developed would be graded to a flat, level surface. The Project site and surrounding area do not contain slopes typical of exacerbating wildfire risk, and once developed, the Project would not result in steep slopes typical of exacerbating wildfire risk.

Prevailing Winds

Prevailing winds are winds that blow from a single direction over a specific area. As mentioned above, the predominant average hourly wind in the Project area is most often from the west for 10 months, and the wind is most often from the east from late November to early February. The windier part of the year lasts for approximately 7 months (November to June), with average wind speeds of more than 7.0 miles per hour (WeatherSpark 2023). High wind velocities that could exacerbate wildfire risk are generally associated with downslope, canyon, and Santa Ana winds that can occur in the winter in this area. As discussed above, the Project site does not include topography that would create unusual weather conditions. Given that Project construction would not involve altering any slopes or creating any new wind patterns, it is not anticipated that the Project would exacerbate wildfire risk due to prevailing winds.

Other Factors

Other factors such as vegetation, building materials, setbacks and proposed on-site activities can also contribute to wildfire risk.

Vegetation

As discussed above, the vegetation of the Project site is characterized by Non-native Grassland, Non-native Woodland, Disturbed Habitat, and Urban/Developed. Further, the Project would convert vacant land with moderate vegetation cover into development consisting of large warehouse buildings, paved surface parking and maintained landscape areas. The proposed landscaping would be implemented according to Chapter 13.36 of the City's Municipal Code and would include maintained landscaped areas. The proposed landscape plan does not have any flammable plants to ensure that it does not increase fire risk. As such, impacts would be **less than significant.**

Building Materials and Setbacks

Project buildings would be required to comply with the City's Municipal Code, which adopts the 2022 CFC and includes provisions for fire safety and fire-resistive construction. Further, compliance with required setbacks would allow for space between Project buildings and off-site vegetation. Studies indicate that given certain assumptions (e.g., 10 meters of low-fuel landscape, no open windows), wildfire is unlikely to spread to buildings unless the fuel and heat requirements of the building are sufficient for ignition and continued combustion (Alexander et al. 1998; Cohen 1995). Construction materials and methods can prevent or minimize ignitions. According to previous research, post-fire assessments conducted in San Diego County indicate that updated building codes have shown success in preventing structural loss (IBHS 2008). The distance between a wildfire that is consuming wildland fuel and a building is the primary factor for structure ignition (not including burning embers) (Cohen 2000). Project structures would be set back from offsite fuels, and perimeter parking and drive aisles would serve as nonflammable fuel breaks. Low-ignitability buildings provide the option of reducing the wildland fire threat to structures without extensive wildland fuel reduction. The Project would be required to comply with construction methods outlined in the City's Municipal Code, the CFC and CBC, which specify requirements for materials and construction methods for fire safety. The proposed building materials for Project structures include concrete, metal, aluminum entrance front framing, glass, and other fire-resistant materials. If structures have a sufficiently low ignitability, such as the Project's structures, buildings can survive exposure to wildfire without major fire destruction.

Project Design Feature (PDF-WF-1)

As described in Chapter 3 of this EIR and consistent with recommendations of the Project's FPP (see Appendix N of this EIR), the Project includes the following project design feature (PDF):

PDF-WF-1: Prior to the start of construction activities and issuance of grading permits and consistent with the Fire Protection Technical Report prepared for the Project (see Appendix N of this Draft EIR), the Project applicant, or its designee, shall ensure that the Project includes the following fire protection and life safety features,: (1) an encircling fire apparatus roadway; (2) a secure Knox box access; (3) dual fire department connections; (4) reliable water supply arrangements; (5) strategically placed fire department access points; (6) ample on-site fire hydrants; (7) an advanced ESFR sprinkler system; (8) a diesel fire pump; (9) a Class I manual wet standpipe system; (10) well-placed exits with illumination and signage; (11) readily accessible fire extinguishers; and (12) the implementation of recommended fire hazard mitigation strategies outlined in Section 7 of the Project FPP (see Appendix N of this Draft EIR).

Proposed Activities

The future tenant of the proposed industrial building is not known at this time. Project activities could introduce new potential sources of ignition to the Project site. The Project would support a variety of activities associated with the industrial/warehouse buildings, including the ingressing and egressing of passenger vehicles and trucks, the loading and unloading of trucks with designated truck courts/loading areas, and the internal and external movement of materials around the Project site via forklifts, pallet jacks, and similar equipment. In addition, the office space would support general internal office activities related to the industrial/warehouse uses. However, proposed activities do not consist of highly flammable activities typical of exacerbating fire risk, such as welding or other hot work. Given that the proposed use would not exacerbate fire risk and given that vegetation on site would consist of fire-resistant and irrigated landscaping, the likelihood of a fire starting on site and spreading to off-site areas would be minimal.

With adherence to the City's Municipal Code, the low ignitability of the proposed structures, and implementation of fire-resistant, irrigated landscaping, the Project would not facilitate wildfire spread or exacerbate wildfire risk or expose people or structures, indirectly or directly, to significant wildfire risk. Further, the surrounding off-site fuels consist of moderately spaced vegetation, segmented by the San Diego River immediately north, with limited vegetation south given the urban uses and zoning. Although there have been fires shown in Figure 4.14-2, Wildfire History within a five-mile buffer, wildfires in the immediately surrounding area are not common. It is unlikely that Project occupants would be exposed to the uncontrolled spread of a wildfire or prolonged pollutant concentrations in the event of a wildfire. Additionally, as summarized above, in Chapter 3 of this EIR, and in the conclusion of the Project's FPP, the Project includes project design features (PDF-WF-1) that exceed fire code requirements. Thus, the Project would not exacerbate risk by exposing project occupants to wildfire. It is not anticipated that the Project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose Project occupants to pollutant concentrations from a wildfire, the uncontrolled spread of a wildfire, or significant risks associated with wildfires, and with implementation of the low fuel volume landscape plan, impacts would be **less than significant.**

C. 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?

Less-than-Significant Impact. The Project involves the development of a previously developed site to include an industrial/warehouse building, with associated office space, loading docks, trailer stalls, passenger vehicle parking spaces, and street, sidewalk, and landscape improvements. As discussed in Section 4.13, Utilities and Service Systems, the Project would include reconfiguration of existing service utilities (e.g., water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications services). This also includes some additions. This would include a new 8-inch line for wastewater to connect to existing lines near to the project site, and as referenced in the Project's FPP, two new Fire department connections, one in the southeast and one in the northwest corner of the building.

Given that the activity of connecting utilities from their current locations to the Project site and the new off-site improvements would require ground disturbance and the use of heavy machinery associated with trenching, the installation of these utility service lines could potentially result in temporary impacts to the environment and could exacerbate wildfire risk by introducing new potential sources of ignition, such as the use of heavy machinery, welding, or other hot work. However, as previously discussed, vegetation would be removed from the site prior to the start of construction, and the site would be graded to a flat, level surface, which would reduce the likelihood of fire ignition during installation and connection of utilities. The majority of the associated infrastructure and utility

connections would occur on site or adjacent to the site and would not result in off-site environmental impacts or exacerbate wildfire risk.

The installation and maintenance of roads, service utilities, drainage and water quality improvements, and vegetation removal are part of the Project analyzed herein. As such, any potential temporary or ongoing environmental impacts related to these components of the Project have been accounted for and analyzed in this EIR as part of the impact assessment conducted for the entirety of the Project. Additionally, the Project would be required to comply with all regulatory requirements and mitigation measures outlined within this EIR for the purposes of mitigating impacts associated with trenching, grading, site work, and the use of heavy machinery. No adverse physical effects specifically related to wildfire or beyond those already disclosed throughout this EIR would occur as a result of implementation of the Project's associated infrastructure. Therefore, the installation and maintenance of associated infrastructure would not exacerbate wildfire risk or result in impacts to the environment beyond those already disclosed in this EIR, and impacts would be **less than significant**.

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?

Less-than-Significant Impact. Vegetation plays a vital role in maintaining existing drainage patterns and the stability of soils. Removal of surface vegetation reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris or mud-flows. If hydrophobic conditions exist post-fire, the rate of surface water runoff is increased as water percolation into the soil is reduced (Moench and Fusaro 2012). The potential for surface runoff and debris flows therefore increases for areas recently burned by large wildfires (Moench and Fusaro 2012). The Project site is located within the San Diego River Watershed. The San Diego River is located immediately north of the Project site. As discussed in the Geotechnical Report (Appendix G of this EIR), the Project site is relatively flat and is not within areas mapped as susceptible to subsidence, or landslides. Further, according to available wildfire history (see Figure 4.14-2, Wildfire History), wildfires have not burned onto or adjacent to the Project site, and conditions associated with post-fire slope instability do not exist.

As further discussed in Section 4.8, Hydrology and Water Quality, the northern perimeter of the Project site is located within a Special Flood Hazard Area, which is an area that presents a 1% annual chance of flooding, or the 100-year base floodplain with flood elevations provided (FEMA 2023). Although internal drainage patterns would be somewhat altered as a result of Project development, the Project would be similar to existing drainage conditions and would maintain adequate stormwater conveyance and would decrease runoff rates by capturing stormwater in proposed on-site storm drains and water quality basins. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off site. Therefore, due to the proposed grading of the site, the relatively flat surrounding lands, and the fact that the site would be developed and paved, the likelihood for downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes would be minimal, and impacts would be **less than significant**.

4.14.5 Mitigation Measures and Level of Significance After Mitigation

All impacts related to wildfire would be less than significant. No mitigation is required.

5 Effects Found Not To Be Significant

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) briefly describe potential environmental effects that were determined not to be significant and therefore were not discussed in detail in the EIR. The environmental issues discussed in the following sections are not considered significant for the Palisade Santee Commerce Center Project (Project), and the reasons for these less-than-significant impact or no impact determinations are discussed herein.

5.1 Agricultural and Forestry Resources

Conversion of Agricultural Lands and Forestlands

The Project site is currently occupied by the Santee Drive-In Theatre with a few small buildings within the parcel. The California Department of Conservation has not identified the site as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2018). The Project site is designated as "Urban and Built-Up Land," by the California Department of Conservation, which is not a category under this CEQA criterion. In this case, the California Department of Conservation's designation of the Project site as "Urban and Built-Up Land" recognizes the fact that the site has a land use designation and zoning for light industrial uses, and has surrounding industrial land uses, which suggests a potential use for farmland is highly unlikely to occur because of the site location.

Because the site is not identified as Prime Farmland, Unique Farmland or Farmland of Statewide Importance, and because the "Urban and Built-Up Land" designation is not a category under this criterion, there would be no impact related to converting Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

The Project site has a land use designation and zoning for light industrial uses. The site is not planned for or used for any agricultural or forestry purposes. According to the City's Draft Program EIR for the Housing Element Rezone Program Implementation, there are no lands protected by a Williamson Act Contract within the City (City of Santee 2022). Therefore, there would be no impact related to conflict with existing zoning or a Williamson Act Contract.

No portion of the site is considered forest land[1] as defined in California Public Resources Code Section 12220(g). Timberland[2] (as defined by California Public Resources Code Section 4526) or timberland-zoned timberland production[3] (as defined by Section 51104[g] of the Government Code) is not present on-site, nor are there any active or potential commercial timber operations present in the area. The proposed Project would not involve the conversion of forest land to non-forest use. Therefore, the Project would not conflict with lands zoned for forest land, timberland, or timberland production and there would be no impact.

1 "Forest land" is land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

2 "Timberland" means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.

3 "Timberland production zone" means an area is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses.

5.2 Geology and Soils

Fault Rupture

The Alquist–Priolo Earthquake Zoning Act (Alquist–Priolo Act) requires the delineation of fault zones along active faults in California. The purpose of the Alquist–Priolo Act is to regulate development on or near active fault traces to reduce hazards associated with fault rupture. The Alquist–Priolo Earthquake Fault Zones are the regulatory zones that include surface traces of active faults. According to the California Geological Survey, the Project site is not located in an Alquist–Priolo Earthquake Fault Zone (CGS 2023). The nearest potentially active fault (i.e., Quaternary fault) is the Rose Canyon/Newport-Inglewood fault zone, located approximately 15 miles west of the Project site (CGS 2015). As a result, no impacts would occur with respect to active faulting.

Seismic Ground Shaking

Similar to other areas located in seismically active Southern California, the City is susceptible to strong ground shaking during an earthquake. However, the Project site is not located within an Alquist–Priolo Earthquake Fault Zone, and the site would not be affected by ground shaking more than any other area in this seismic region. Pursuant to the 2022 California Building Code and Title 11, Buildings and Construction, of the Santee Municipal Code, the Project's geotechnical report will be subject to review and approval by City staff prior to issuance of a grading permit. Compliance with the recommendations of the geotechnical report is mandated by Section 11.40.130 of the Santee Municipal Code, and compliance is subject to inspection by the City Building Official. With implementation of the recommendations of the Project's geotechnical report, impacts associated with strong seismic ground shaking would be less than significant.

Seismic Related Ground Failure

Soil liquefaction is a seismically induced form of ground failure that has been a major cause of earthquake damage in Southern California. Liquefaction is a process by which water-saturated granular soils transform from a solid to a liquid state because of a sudden shock or strain, such as an earthquake. Lateral spreading occurs in liquefaction prone sediments on unsupported slopes. Based on Figure 8-3 of the City's General Plan Safety Element, the Project site is located in area C3, which identifies the liquefaction potential as low to moderate (City of Santee 2003). A Project-specific liquefaction analysis was completed, assuming a magnitude 6.9 earthquake, historical high groundwater depth of 20 feet below ground surface, and a peak ground acceleration of 0.42g (percent of gravity). Based on the analysis, seismic settlements of 7/8 inch or less are anticipated in the proposed building area, with differential settlements of approximately 0.25 inch over a horizontal distance of 50 feet (Appendix G). Pursuant to the 2022 California Building Code and Title 11, Buildings and Construction, of the Santee Municipal Code, the proposed building would be constructed in accordance with this liquefaction analysis. Therefore, impacts associated with potential seismic-related ground failure, including liquefaction, and associated lateral spreading, would be less than significant.

Landslide

Based on the Project-specific geotechnical report (Appendix G) and the City General Plan Safety Element (City of Santee 2003), the Project site is located on relatively flat to gently sloping terrace deposits/older alluvium, adjacent to the San Diego River, and would not be susceptible to landslides (City of Santee 2003). Grading for the Project would not result in slopes susceptible to landslides, as only the upper approximate 2 feet of soils would be

overexcavated and recompacted during grading (Appendix G). As a result, impacts related to landslides would be less than significant.

Soil Erosion and Topsoil Loss

The Project would involve earthwork and other construction activities that would disturb surface soils and temporarily expose soils to increased erosion potential. Common causes of soil erosion from construction sites include stormwater, wind, and soil being tracked off site by vehicles. Because more than 1 acre of ground disturbance would occur during Project grading and construction, the Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order WQ 2022-0057-DWQ, NPDES No. CAS000002, also known as the Construction General Permit. The Construction General Permit requires implementation of a Stormwater Pollution Prevention Plan and associated Best Management Practices, which would minimize soil erosion during grading and construction. Upon completion of construction, the Project site would be developed with a warehouse building, surrounding paved parking lot, truck loading areas, and other improvements and landscaped areas. These paved areas would stabilize soils and eliminate long-term erosion. As a result, construction- and operations-related soil erosion impacts would be less than significant.

Unstable Geologic Unit or Soil

As discussed previously, the potential for the Project to result in or be affected by landslides is low, and this issue is not anticipated at the Project site. Based on a Project-specific liquefaction analysis, seismic settlements of 7/8 inch or less are anticipated in the proposed building area, with differential settlements of approximately 0.25 inch over a horizontal distance of 50 feet. Similarly, based on consolidation testing at the site, ground settlement of ¾ inch could occur uniformly across the site, and differential settlement up to 0.25 inch could occur (Appendix G). The Project site is not located in an area prone to regional ground subsidence due to groundwater pumping, peat loss or oil extraction (USGS 2023). However, based on soil density testing at the site, subsidence up to 0.2 feet could occur due to earthwork operations. However, in compliance with the 2022 California Building Code and pursuant to Title 8, Buildings and Construction, of the Santee, California Municipal Code, the Project's geotechnical report will be subject to review and approval by City staff prior to issuance of a grading permit. Compliance with the recommendations of the geotechnical report is mandated by Section 11.40.150 of the Santee, California Municipal Code, and compliance is subject to inspection by the City Building Official. With implementation of the recommendations of the Project's geotechnical report, impacts would be less than significant.

Expansive Soil

Expansive soils are characterized by their potential shrink/swell behavior. Shrink/swell is the change in volume (expansion and contraction) that occurs in certain fine-grained clay sediments from the cycle of wetting and drying. Clay minerals are known to expand with changes in moisture content. The higher the percentage of expansive minerals present in near-surface soils, the higher the potential for substantial expansion. Soil expansion tests were not completed as part of the geotechnical investigation; however, the Project site is underlain by terrace deposits and alluvium, consisting primarily of sands, which are not prone to expansion. Per the geotechnical report (Appendix G), additional soil sampling would be completed during final Project design and the Expansive Soil Guidelines in the geotechnical report would be adhered to during construction. As a result, impacts related to expansive soil would be less than significant.

Septic Tanks

The Project would connect to the City's municipal sewer lines and would not require septic tanks or alternative wastewater disposal systems. Therefore, no impacts would occur.

5.3 Mineral Resources

Mineral Resources and Recovery Sites

The Project site is located in an urbanized portion of the City and is bound by existing utility and industrial development to the east, west and south. Mineral resource mining is not a compatible use with these land uses. The San Diego River is adjacent and north of the site. While mining for construction sand has been permitted in portions of the San Diego River in the past, there are no mining permits near the project site. The Project site is not large enough to effectively extract mineral resources. Considering the existing surrounding land uses and the incompatibility of mineral resource extraction activities in the Project area, potential significant mineral resources within the Project area are considered unavailable for extraction. Therefore, impacts associated with mineral resources would be less than significant.

5.4 Population and Housing

Inducement Population Growth

The Project would require a temporary construction workforce and a permanent operational workforce, both of which could potentially induce population growth in the Project area. A temporary workforce would be needed to construct the warehouse buildings and associated improvements. The number of construction workers needed during any given period would largely depend on the specific stage of construction but would likely range from a dozen to several dozen workers on a daily basis. These short-term positions are anticipated to be filled primarily by construction workers who reside in the Project site's vicinity; therefore, construction of the Project would not generate a permanent increase in population within the Project area.

Permanent employment at the completed 300,145 square feet commerce center is expected to generate 185 direct new jobs (London Moeder Advisors 2023). Although some of these jobs could result in relocation to the area, the increase in population would be minor.

According to the San Diego Association of Governments Demographics and Growth Forecast, employment in the City is anticipated to grow from 1,646,419 jobs in 2016 to 2,086,419 jobs in 2050 (SANDAG 2021). The Project-related increase in employment would be minimal in comparison to the anticipated increase in the Southern California Association of Governments Demographics and Growth Forecast.

Additionally, as of April 2023, the California Employment Development Department found that the unemployment rate for San Diego-Carlsbad Metropolitan Statistical Area, including the City of Santee, is at 3.3%, which is lower than the state average (4.3%) and higher than the national average (3.1%) for the same period (EDD 2023). As such, the Project's temporary and permanent employment requirements could likely be met by the City's existing labor force without people needing to relocate into the Project region, and the Project would not stimulate population growth or a population concentration above what is assumed in local and regional land use plans. With a total of 185 permanent direct employees estimated, it is reasonable to assume any relocations to the area as a result of the Project would be minor. Therefore, impacts would be less than significant.

Displacement of Existing Housing and People

The Project site currently does not contain any housing or other residential uses. Given that no residential uses are located on-site, it follows that the site does not support a residential population and there would be no displacement of people or housing. Therefore, no impact would occur.

5.5 Recreation

Existing, Expanded, and New Recreation Facilities

The Project would construct one industrial/warehouse building and associated improvements. The Project does not propose any residential uses and would not result in a substantial and unplanned increase in population growth within the Project area. As such, the Project would not increase the use of existing neighborhood parks or regional parks in the City and surrounding area. In addition, as an industrial use, the Project does not propose recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impacts would occur.

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6 Other CEQA Considerations

6.1 Cumulative Impacts

Section 15130(a) of the State CEQA Guidelines requires a discussion of the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulatively considerable, as defined in CEQA Guidelines Section 15065(a)(3), means that the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The State CEQA Guidelines Section 15355 defines a cumulative impact as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

In many cases, the impact of an individual project may not be significant, but its cumulative impact may be significant when combined with impacts from other related projects. CEQA Guidelines Section 15130(b) states that "the discussion [of cumulative impacts] need not provide as great detail as is provided for the effects attributable to the project alone." Section 15130(b) further states that a cumulative impacts discussion "should be guided by standards of practicality and reasonableness."

Cumulative impacts can also occur from the interactive effects of a single project. For example, the combination of noise and dust generated during construction activities can be additive and can have a greater impact than either noise or dust alone. However, substantial cumulative impacts more often result from the combined effect of past, present, and future projects located in proximity to a proposed project. Thus, it is important for a cumulative impacts analysis to be viewed over time and in conjunction with other related past, present, and reasonably foreseeable future projects, the impacts of which might compound or interrelate with those of the project under review.

Probable future projects are those in the project vicinity that have the possibility of interacting with the project to generate a cumulative impact (based on proximity and construction schedule) and either:

- are partially occupied or under construction,
- have received final discretionary approvals but are not yet constructed,
- have applications accepted as complete by local agencies and are currently undergoing environmental review, or
- are projects that have been discussed publicly by an applicant or that otherwise become known to a local agency and have provided sufficient information about the project to allow at least a general analysis of environmental impacts.

CEQA Guidelines Section 15130 identifies two basic methods for establishing the cumulative environment in which a project is considered: the use of a list of past, present, and probable future projects, or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. This cumulative analysis uses a combination of the "list" approach and the "projections" approach to identify the cumulative setting.

Geographic Scope

The geographic area that could be affected by the project varies depending on the type of environmental resource being considered. When the effects of the project are considered in combination with those other past, present, and probable future projects to identify cumulative impacts, the other projects that are considered may also vary depending on the type of environmental effects being assessed. Table 6-1 presents the general geographic areas associated with the different resources addressed in this analysis.

Table 6-1. Geographic Scope of Cumulative Impact Analyses

Environmental Issue	Geographic Scope of Cumulative Impact Analyses
Aesthetics	Project site and viewshed
Air Quality	Region (pollutant emissions that affect the air basin), immediate project vicinity (pollutant emissions that are highly localized)
Biological Resources	Local and regional vicinity
Cultural Resources, Tribal Cultural Resources, and Paleontological Resources	Project site
Energy	Region and immediate project vicinity
Greenhouse Gas Emissions	Global/statewide
Hazards and Hazardous Materials	Project site and immediate project vicinity
Hydrology and Water Quality	Project site and immediate project vicinity
Land Use and Planning	Project site and immediate project vicinity
Noise	Project site and immediate project vicinity
Public Services	Project site and immediate project vicinity
Transportation	Project site and surrounding areas
Utilities and Service Systems	Project site and surrounding areas
Wildfire	Project site and immediate project vicinity

Project List

For the analysis of cumulative impacts associated with the Project, a cumulative project list was developed through consultation with the City of Santee. Table 6-2 provides a list of these cumulative projects and their associated land use.

City ID[1]	Project	Status	Address	Land Use/Description
1	Warmington Townhomes	Pending Entitlement	10939 Summit Avenue	50 residential condominium units
2	D'Lazio Condominiums	Approved 8/23/06 - Under Construction	8439 Fanita Drive	20 residential condominium units

City ID[1]	Project	Status	Address	Land Use/Description
3	Vactor Decanting Station	Pending Entitlement	9534 Via Zapador	Vactor truck dewatering station
4	Karl Strauss	Approved 12/17/15 - Not Built	300 Town Center Parkway	Brewery, tasting room, & restaurant
6	Prospect Estates II Subdivision	Approved 10/9/19 - Under Construction	8705 Marrokal Lane	38 condos, 15 single-family homes
7	Palazzo Villas	Approved 2/12/20 - Not Built	8842 Olive Lane	8 residential condominium units
8	Starbucks & 7-Eleven	Approved 6/10/20 - Not Built	8606 Graves Avenue	4,800 sq. ft. coffee shop & convenience store
9	Tyler Street Subdivision	Approved 4/24/24 - Not Built	8500 Tyler Street	14 single-family homes
11	Shadowhill Commercial Building	Pending Entitlement	SW Corner Woodside Ave. and Shadowhill Rd.	6,197 sq. ft. commercial building
12	County Animal Shelter	Pending Entitlement	Riverview Parkway	23,303 sq. ft. animal shelter
13	Woodspring Suites Hotel	Approved 9/18/19 - Under Construction	8807 Mission Gorge Road	120-guestroom, 4-story hotel
14	Carlton Oaks Country Club	Pending Entitlement	7200 Inwood Drive	243 residential units & hotel
15	All Right Storage	Approved 4/28/21 - Not Built	8708 Cottonwood Avenue	RV and self-storage facility
16	Prospect Avenue Subdivision	Pending Entitlement	8732 Prospect Avenue	4 single-family homes
17	New West Subdivision	Approved 4/10/24 - Not Built	9463 Slope Street	11 single-family homes
18	Graves Avenue RV & Self Storage	Approved 9/25/24 – Not Built	8355 Graves Avenue	RV and self-storage facility
19	Laurel Heights Condominiums	Approved 8/11/21 - Under Construction	7750 Laurel Heights Drive	80 residential condominium units
20	Extra Space Storage	Pending Entitlement	10815 Woodside Avenue	88,390 sq. ft. (3-story) storage building
21	Popeye's	Approved 12/14/22 - Under Construction	10308 Mission Gorge Road	1,740 sq. ft. drive-through restaurant
22	Lake Canyon Subdivision	Approved 12/14/22 - Not Built	9210 Lake Canyon Road	9 single-family homes
23	Atlas View Apartments	Pending Entitlement	8726 Atlas View Drive	10 residential apartments
24	Fanita Drive Townhomes	Approved 7/12/23 - Not Built	8504 Fanita Drive	8 residential condominium units
25	Southwest Signal Building	Approved 10/10/23 – Not Built	10756 Rockvill Street	20,000 sq. ft. industrial building
26	Lantern Crest	Approved 2/22/23 - Under Construction	300 Lantern Crest Way	432- unit congregate care facility w/ density bonus
27	Fanita Ranch Planned Development	Approved 9/23/20 - Not Built	Fanita Ranch	Master-planned community w/up to 3,008 homes
28	Paseo	Pending Entitlement	701 Park Center Drive	53-unit condominium units

City ID[1]	Project	Status	Address	Land Use/Description
29	Excel Hotel	Approved 4/26/23 - Not Built	381 Town Center Parkway	97 guestroom, 4-story hotel
30	Cuyamaca Business Center	Approved 3/12/24 – Not Built	9745 Cuyamaca Street	6,280 sq. ft. medical office building
31	Ukrainian Catholic Church	Approved 11/8/23 - Not Built	9308 Carlton Oaks Drive	4,400 sq. ft. church
32	Atlas Cell Phone Tower	Pending Entitlement	10400-CS Fanita Parkway	74' cell phone tower at Santee Lakes
33	Lutapaj Specialty Food Store	Approved 1/25/2024 - Not Built	282 Town Center Parkway	2,016 sq. ft. specialty food & tasting facility
34	Cuyamaca/Prospect Starbucks	Approved 6/12/2024 - Not Built	8606 Cuyamaca Street	1,270 sq. ft. drive-through coffee shop
35	Walmart Housing Site	Pending Entitlement	NW of Mission Gorge Road/ Town Center Parkway	115 residential townhomes
36	Santee Auto Center	Approved 10/25/23 – Under Construction	10335 Mission Gorge Road	Two car dealerships, auto body shop, & car wash
37	Fordyce Construction Office	Pending Entitlement	9735 Prospect Avenue	11,295 sq. ft. commercial office and warehouse
38	Habitat for Humanity Townhomes	Approved 9/27/23 - Not Built	8932 First Street	17 residential condominium units
39	Super Star Car Wash	Approved 3/27/24 - Not Built	8837 Magnolia Avenue	4,980 sq. ft. tunnel car wash
40	Aubrey Glen Townhomes	Pending Entitlement	7737 Mission Gorge Road	52 residential condominium units
41	Santee Community Center	Pending Entitlement	10123 Riverwalk Drive	12,500 sq. ft. Community Center w/ event space
42	Cuyamaca St Right Turn Pocket	Approved 3/22/23 - Not Built	Cuyamaca St & Mission Gorge Rd	New right-turn only lane
43	Parkvue	Pending Entitlement	Cottonwood Ave. & Park Center	358 residential condominium units
44	Soapy Joe's	Approved 1/18/2024 - Not Built	9015 Mission Gorge Road	Express Car Wash conversion
45	Interim Fire Station	Pending Entitlement	9532 Via Zapador	Fire Station No. 20 relocation
46	AT&T Princess Joann Tower	Pending Entitlement	North of Cuyamaca Street and west of Princess Joann Road	Cell tower for AT&T
47	Valvoline Instant Oil Change	Pending Entitlement	10463 Mission Gorge Road	Valvoline Instant Oil Change Station
N/A	Lake Jennings Marketplace	Approved 1/24/18 – Not Built	Olde Hwy 80 and Lake Jennings Road	Commercial shopping center including gas station with car wash

City ID[1]	Project	Status	Address	Land Use/Description
N/A	Riverford Road Roundabouts	Pending Entitlement - The project anticipates delivering the Project Approval and Environmental Document (PA&ED) on 1/17/25	SR 67 and Riverford Road - unincorporated area of San Diego County within the Community of Lakeside and a portion in the City of Santee	Consolidate three intersections into two roundabouts along Riverford Road on either side of the SR-67
N/A	Hillside Meadows	To be confirmed - County/ PDS2022-TM-5023TE	Lakeside - north and south of the western terminus of Mast Boulevard, east of the City of Santee, and south of El Nopal	Residential

Notes:

[1] Corresponds with the City's Active Projects Log, available on the City's website: https://www.cityofsanteeca.gov/documents/planning-building/active-projects/active-projects-map.pdf

6.1.1 Cumulative Impact Analysis

Consistent with State CEQA Guidelines Section 15130, the discussion of cumulative impacts in this Draft EIR focuses on significant and potentially significant cumulative impacts. Section 15130(b) of the State CEQA Guidelines provides, in part, the following:

> [t]he discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

A proposed project is considered to have a significant cumulative effect if:

- the cumulative effects of development without the project are not significant and the project's additional impact is substantial enough, when added to the cumulative effects, to result in a significant impact, or
- the cumulative effects of development without the project are already significant and the project contributes measurably to the effect.

The term "measurably" is subject to interpretation. The standards used herein to determine measurability are that the impact must be noticeable to a reasonable person or must exceed an established threshold of significance (defined throughout the resource sections in Chapter 4 of this Draft EIR). This cumulative analysis also assumes that all mitigation measures identified in Chapter 4 to mitigate project impacts are adopted and implemented.

The cumulative impact analysis provided in this chapter evaluates whether the residual impacts of the Project would cause a cumulatively significant impact or would contribute considerably to existing/anticipated (without the project) cumulatively significant effects. Where the Project would so contribute, additional mitigation is recommended where feasible.

Aesthetics

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

The geographic area for the consideration of cumulative impacts to scenic vistas is the Project viewshed. The Project was determined to have less than significant impacts to views from the San Diego River Trail/Walker Preserve Trail and views from Sandy Drive toward Rattlesnake Mountain. The Project site and future industrial/warehouse building development would not be visible from the projects considered in the cumulative analysis. The closest project to the San Diego River Trail/Walker Preserve Trail, Project #12 (23,303 sf County Animal Shelter on Riverview Parkway), would not be visible from the San Diego River Trail/Walker Preserve Trail due to the presence of intervening vegetation, development, and terrain. While most cumulative projects would not be visible from the San Diego River/Walker Preserve Trail, the Carlton Oaks Golf Course and Parkvue project would be located adjacent to and visible from the River. Also, based on location and presence of intervening vegetation and structures, development of the cumulative projects under consideration would not result in a potentially significant impact onto views of Rattlesnake Mountain. While the Project site and all projects in the cumulative scenario would have some semblance of visibility from Rattlesnake Mountain and prominent terrain in its surrounding preserve, development at these sites would be viewed alongside existing development in the broad, urbanized landscape of the Santee. Thus, the Project's contribution to substantial changes to scenic vistas **would not be cumulatively considerable**.

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

There is one officially designated state scenic highway partially within Santee, State Route (SR) 52 as it travels adjacent to Mission Trails Regional Park (approximately Santo Road in San Diego to Mast Boulevard in Santee). SR-52 (from Mast Boulevard in Santee to SR-67 in Santee) is an eligible state scenic highway within Santee. The Project is located approximately four miles east of the designated portion of SR 52 and approximately one mile north of the eligible portion of SR 52. Based on this distance and intervening natural topography and development, the Project site is not located within the viewshed of either segment of SR 52. While there are multiple cumulative projects along the eligible portion of SR 52, these are located within areas of existing development and would not substantially impact the viewshed of this eligible segment. Thus, the Project's contribution to substantial changes to scenic vistas **would not be cumulatively considerable**.

In non-urbanized areas, would the Project 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 points). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

The City of Santee shares a border with the City of El Cajon, and because the two cities' combined population exceeds 100,000 persons, the City of Santee is considered an urbanized area per CEQA, and the first question of this threshold does not apply to the Project, as it is directed at non-urbanized areas (DOF 2023).

The Project would undergo review by City Staff for a new building within the Light Industrial zone (Section 13.14.040 of the Santee Municipal Code). Further, the proposed building would be visually compatible with existing warehouse and business park structures on neighboring properties and would be consistent with the site's existing General Plan land use designation and zoning code. Presumably, as development occurs elsewhere throughout the City, any proposal to change the development intensity to exceed maximum design standards for a specific property would be resolved through an amendment to the applicable land use plan and/or obtainment of a conditional use permit.

Any action involving an amendment would be subject to CEQA and the amendment and evaluation of consistency with scenic quality regulations would be reviewed on a case-by-case basis. Should any amendment or proposed exceedance result in a significant environmental effect to visual character and quality, mitigation measures would be identified to reduce those impacts. Based on the evaluation presented above, the project's contribution to any conflicts with applicable zoning and other regulations governing scenic quality **would not be cumulatively considerable**.

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

Construction night lighting was determined to be less than significant. Night construction is not anticipated to be required as Project construction would be limited to the City's allowable construction hours of 7:00 a.m. and 7:00 p.m. Project operational lighting is designed consistent with the requirements of Section 13.30.030(B) of the Santee Municipal Code and more specifically, exterior lighting on the Project site would result in the adequate lighting of parking areas and would cast light downward where most lighting would fall onto the site (offsite light trespass would be minimal). Further, all measurable lighting (i.e., 0.1-foot candles or greater) would generally be contained within the site boundary. Regarding glare, the majority of the exterior building surfaces would consist of painted concrete (i.e., tilt-up concrete walls) and would not generate glare.

Similar to the Project, all projects considered in the cumulative scenario would be required to adhere to the City's allowable construction hours and with the requirements of Section 13.30.030(B) of the Santee Municipal Code. The cumulative projects are also generally located in/near residential areas and would be required to closely adhere to City standards to ensure that nearby residential land uses are not substantially affected by new sources of lighting and glare. Regarding glare, cumulative projects would include exterior lighting and typical sources of potential glare associated with the types of development. Specifically, cumulative projects would incorporate glass in exterior or site structures and would be required to disclose (through the City's entitlement process) specifications of building materials and evaluate the potential for building materials to result in substantial glare. The new developments in the cumulative scenario would not traditionally include reflective glass or other highly reflective building materials.

Thus, the Project's contribution to substantial effects of light and glare **would not be cumulatively considerable**.

Air Quality

In analyzing cumulative air quality impacts from a project, the analysis must specifically evaluate the project's contribution to the cumulative increase in pollutants for which the San Diego Air Basin (SDAB) is designated as nonattainment for the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). If the project does not exceed thresholds and is determined to have less than significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the project components, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, a project would only be considered to have a significant cumulative impact if its contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

Additionally, for the SDAB, the Regional Air Quality Strategy (RAQS) serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions within the basin to ensure the SDAB continues to make progress toward NAAQS and CAAQS attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in

combination, they would conflict with or obstruct implementation of the RAQS. Similarly, individual projects that are inconsistent with the regional planning documents on which the RAQS is based would have the potential to result in cumulative impacts if they represent development beyond regional projections.

Conflict with or obstruct implementation of the applicable air quality plan?

As discussed in Section 4.2.4, the Project is consistent with the underlying land use and zoning for the Project site. Therefore, the Project source emissions are not anticipated to result in air quality impacts that were not previously envisioned in the growth projections and RAQS, and implementation of the Project would not result in development in excess of that anticipated in local plans or increases beyond those contemplated by SANDAG. Because the proposed land use and associated vehicle trips are anticipated in local air quality plans, the Project would be consistent at a regional level with the underlying growth forecasts in the RAQS.

The SDAB has been designated as a federal nonattainment area for O_3 and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. PM_{10} and $PM_{2.5}$ emissions associated with construction generally result in near-field impacts. The nonattainment status is the result of cumulative emissions from all sources of these air pollutants and their precursors within the SDAB. As shown in Table 4.2-9 of this EIR, the emissions of all criteria pollutants from the Project's construction would be below the significance levels. Construction would be short term, temporary in nature, and activities would be considered typical of an industrial project. Once construction is completed, construction-related emissions would cease. Operational emissions generated by the Project would not result in emissions that exceed significance thresholds for any criteria air pollutant.

Regarding long-term cumulative operational emissions in relation to consistency with local air quality plans, the state implementation plan (SIP) and RAQS serve as the primary air quality planning documents for the state and SDAB, respectively. The SIP and RAQS rely on San Diego Association of Governments (SANDAG) growth projections based on population, vehicle trends, and land use plans developed by the cities and by the County as part of the development of their general plans. Therefore, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the SIP and RAQS and would not be considered to result in cumulatively considerable impacts from operational emissions. As shown in Table 4.2-10 of this EIR and discussed in Section 2.5.1 of Appendix B, the Project's operational emissions would be below the significance levels. Thus, it would be consistent at a regional level with the underlying growth forecasts in the SIP and RAQS.

Therefore, the Project's adverse effects from short-term construction emissions and long-term operational emissions **would not be cumulatively considerable**.

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?

As discussed previously, air pollution by nature is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the San Diego Air Pollution Control District (SDAPCD) develops and implement plans for future attainment of ambient air quality standards. The potential for the Project to result in a cumulatively considerable impact, specifically, a cumulatively considerable new increase of any criteria pollutant for which the project region is nonattainment under an applicable NAAQS and/or CAAQS is addressed in response to Threshold 4.2.4-B (see Section 4.2, Air Quality, of this EIR). Consistent with the finding for the Project, the cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment would be less than significant during construction and operation for cumulative impacts. Therefore, the Project's

adverse effects related to a net increase of any criteria pollutant for which the Project region is non-attainment **would not be cumulatively considerable**.

Expose sensitive receptors to substantial pollutant concentrations?

As discussed in response to Threshold 4.2.4-C regarding sensitive receptors, the Project would result in a less-than-significant impact for construction-related and operational impacts. The Project would also not cause or create a carbon monoxide (CO) hotspot. The Project would not emit substantial quantities of criteria pollutant emissions or toxic air contaminants (TACs) during operation. The impact of the Project, in addition to growth within ½-mile of the Project could further increase the exposure of air quality pollutants to sensitive receptors. Most of the cumulative projects within Table 6-2 are residential or commercial, and the majority of their emissions (mobile sources) are offsite. Emissions during construction would disperse rapidly from the project sites and generally occur at magnitudes that would not affect substantial numbers of people. Consistent with the significance finding for the Project, during construction there would be a less than significant cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations from TACs. Consistent with the significance finding for the Project, during operation there would be a less than significant cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations from TACs. Therefore, the Project's adverse effects related to exposing sensitive receptors to substantial pollutant concentrations **would not be cumulatively considerable**.

Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

As discussed in response to Threshold 4.2.4-D in Section 4.2, Air Quality, of this EIR, the Project would result in a less than significant impact regarding emissions, such as odors during construction and operation, that would adversely affect a substantial number of people. Odor impacts are generally limited to the immediate area surrounding the source. SDAPCD Rule 51 (Nuisance) also prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person.

The Project would not include operations of agricultural uses, wastewater treatment plants, food processing facilities, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding facilities. As such, the Project is not expected to produce any nuisance odors due to its operation. In the event the Project is required to obtain a permit from SDAPCD, SDAPCD staff would review the Project for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance. All cumulative projects would undergo project-specific evaluation during project application process that would identify and potential emissions or odor-causing uses. Should any potentially significant impacts be identified in those project-specific evaluations, mitigation would be implemented to reduce impacts to a less-than-significant level. Because the Project was determined to have no significant impacts regarding emissions that would adversely affecting a substantial number of people, the Project's impacts **would not be cumulatively considerable**.

Biological Resources

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 Wildlife or U.S. Fish and Wildlife Service?

As described in Section 4.3, Biological Resources, of this EIR, no direct impacts would occur to special-status plant or wildlife species with Project implementation; however, the Project could result in direct and indirect impacts to nesting birds and nesting bird habitat. Project implementation also has the potential to result in indirect impacts to

special-status wildlife species; specifically, least Bell's vireo, yellow-breasted chat, and yellow warbler, as well as special-status plant species occurring within the San Diego River corridor. Mitigation proposed for the Project would avoid and minimize the potential for direct and indirect impacts to these resources to a less-than-significant level (See Section 4.3 of this EIR). There are approximately six projects identified by the City of Santee's Active Projects Log that are in various stages of development (i.e., under construction, approved – not built, or pending entitlement) located adjacent to the San Diego River. Similar to the proposed Project, these cumulative projects have the potential to result in indirect impacts to special-status plant or wildlife species located within the San Diego River. All projects, including the proposed Project, would be required to comply with applicable federal and/or state regulations that provide protections for special-status plant and wildlife species, such as FESA or CESA. In addition, projects that affect special-status species may require approval from USFWS and/or CDFW. If significant impacts occur from a particular cumulative project, it is expected that project-specific mitigation measures would be implemented to avoid or minimize impacts to the extent feasible and in compliance with applicable federal and/or state regulations.

Furthermore, the Project site is within the boundaries of the MSCP Plan (City of San Diego 1998). The Draft Santee MSCP Subarea Plan, once finalized, will contribute to the regional MSCP for preservation, mitigation for impacts, and conservation of sensitive biological resources within San Diego County. The Draft Santee MSCP Subarea Plan is also intended to provide cumulative mitigation for impacts to Covered Species within the City of Santee's jurisdiction and to ensure sufficient biological resources are conserved to assist in the conservation and recovery of Covered Species under the MSCP. Therefore, any project within the City of Santee, including the proposed Project, would be required to be consistent with the Draft Santee MSCP Subarea Plan. Because cumulative projects and the proposed Project would be required to meet or exceed MSCP requirements directed toward regional conservation, and project-specific mitigation measures would be implemented, as required, to avoid or minimize potential impacts to sensitive plant and wildlife species, all projects within the boundaries of the MSCP Plan would contribute to species recovery. Therefore, the proposed Project's contribution to adverse effects on species within the MSCP **would not be cumulatively considerable**.

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?

There is no riparian habitat and there are no sensitive vegetation communities with CDFW state rankings of 1, 2, or 3 within the Project site. Permanent impacts to non-native grassland would typically require mitigation to comply with regional MSCP conservation goals (City of San Diego 1998) and the Draft Santee Subarea Plan. However, because the Project's impact to non-native grassland is very minimal (0.27 acres) and this vegetation community is highly disturbed and dominated by annual forb species, direct impacts to non-native grassland would be less than significant with Project implementation. Project implementation has the potential to result in indirect impacts to riparian habitat and sensitive vegetation communities occurring adjacent to the Project site within the San Diego River corridor; therefore, mitigation measures are proposed that would avoid and minimize the potential for indirect impacts to these resources, which would mitigate potential indirect impacts to less than significant. There are approximately six projects identified by the City of Santee's Active Projects Log that are in various stages of development (i.e., under construction, approved – not built, or pending entitlement) located adjacent to the San Diego River. Similar to the proposed Project, these cumulative projects have the potential to result in indirect impacts to sensitive natural communities or riparian habitat located within the San Diego River. However, similar to the Project, other cumulative projects located within the MSCP would be required to meet or exceed MSCP requirements directed toward regional conservation and that project-specific mitigation measures would be implemented, as required, to avoid or minimize potential direct or indirect impacts to riparian habitat or other

sensitive natural communities to a level of less-than-significant. Therefore, the Project's contribution to adverse effects on riparian habitat or other sensitive natural communities with implementation of the Project's mitigation measures **would not be cumulatively considerable**.

Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

All projects, regardless of which local jurisdiction they occur in would be required to comply with all applicable regional or local tree preservation policies or ordinances, such as the City of Santee Urban Forestry Ordinance. The ordinance gives the City of Santee control of all trees, shrubs, and other plantings in any street, park, public right-of-way, landscape maintenance district or easement, or other City owned property. City review and approval of development plans for the proposed Project and other cumulative projects would ensure that any proposed tree removal must conform to the applicable requirements of the Urban Forestry Ordinance and/or zoning codes. The Project does not conflict with any objectives or policies as presented in the Conservation Element of the Santee General Plan. Project implementation would require removal and encroachment upon most onsite trees. Therefore, implementation of mitigation is required, which would ensure compliance with the City's Urban Forestry Ordinance to reduce the impact to less than significant. However, similar to the Project, cumulative projects would be required to comply with all applicable regional or local policies or ordinances as a condition of project approval. Therefore, the Project's contribution to conflicts with any local policies or ordinances protecting biological resources **would not be cumulatively considerable.**

Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The Project site is within the boundaries of the MSCP Plan (City of San Diego 1998) and the Draft Santee MSCP Subarea Plan. Although the Draft Santee MSCP Subarea Plan has not yet been approved or permitted, it is used as the guidance document for projects occurring within the City of Santee. All Project impacts would occur outside of the Draft Santee MSCP Subarea Plan Preserve area. However, the Project site is adjacent to Preserve areas associated with the San Diego River corridor. Mitigation measures are proposed to prevent any indirect impacts to special-status species, sensitive vegetation communities, and jurisdictional aquatic resources associated with the San Diego River Preserve (see Section 4.3 of this EIR). Similar to the Project, cumulative projects located adjacent to the San Diego River Preserve identified in the Draft Santee MSCP Subarea Plan have the potential to result in indirect impacts to special-status species, sensitive vegetation communities, and/or jurisdictional aquatic resources. Any project within the MSCP Plan Area, including the proposed Project, would be required to be consistent with the MSCP. Because all projects within the MSCP Plan Area would be required to meet or exceed MSCP requirements directed toward regional conservation, and project-specific mitigation measures would be implemented to reduce impacts to sensitive plant and wildlife species to a level of less than significant, all projects would contribute to the attainment of conservation goals identified in regional or local HCPs. Therefore, the Project's contribution to conflicts with an adopted HCP or NCCP **would not be cumulatively considerable**.

Cultural Resources, Tribal Cultural Resources, and Paleontological Resources

Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Because all significant historic resources are unique and nonrenewable members of finite classes, meaning there are a limited number of significant historical resources, all adverse effects erode a dwindling resource base. The loss of any one historical site could affect the scientific value of others in a region because these resources are

best understood in the context of the entirety of the historic system of which they are a part. All cumulative projects have or will be evaluated for any project-specific impacts related to historic resources, with mitigation implemented for any potentially significant impacts.

As discussed in Section 4.4, Cultural, Tribal Cultural, and Paleontological Resources, the former Drive-In Theatre on the site appears eligible for listing in the National Register of Historic Places and the California Register of Historical Resources and is assumed to be a historical resource under CEQA (CEQA Guidelines §15064.5(a)(3). Implementation of the project would demolishthe existing Drive-In Theatre structures on the Project site. As explained in the Historic Assessment (Appendix F), the Former Drive-In Theatre on the Project site has been determined to embody the distinctive characteristics of a type, period, and method of drive-in movie theatre construction during the 1960s-1970s. As described in Section 4.4 of this EIR, mitigation measures MM-HIS-1 through MM-HIS--4 would partially mitigate the project's impacts on this historic resource, though not to a less than significant level. Because the project would result in the loss of a historic resource, the project's incremental contribution to loss of historic resources would be **cumulatively considerable**; therefore, the Project's contribution to the loss of -historical resources would be a **significant and unavoidable cumulative impact**.

Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Dudek's archaeological resources inventory included a records search and site visit that assured no known archaeological resources were present or would be adversely changed with the implementation of the Project. However, there exists a moderate potential for the inadvertent discovery of archaeological resources during Project implementation due to the presence of archaeological resources within a one-mile radius of the Project area, a positive search of the Native American Heritage Commission's Sacred Lands File (positive results indicate the presence of Native American cultural resources within one-mile of the Project area, and not necessarily directly within the Project area), and the Project's proximity to the bank of the San Diego River. Implementation of the Project, in combination with cumulative projects, would involve ground-disturbing activities which could result in discovery of or damage to previously undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. This could result in potentially significant cumulative impacts to previously undiscovered or unrecorded archaeological sites and materials. However, when considered in combination with the impacts of other projects in the cumulative scenario, the project would not be cumulatively considerable because implementation of Mitigation Measures (MM-) CUL-1 would reduce project impacts associated with accidental damage to unknown resources to a less-than-significant level. Therefore, the Project's potential contribution to impacts related to previously undiscovered archaeological resources **would not be cumulatively considerable**.

Disturb any human remains, including those interred outside of dedicated cemeteries?

No prehistoric or historic burials were identified within or immediately adjacent to the Project site as a result of the CHRIS records search, NAHC Sacred Lands File search, or pedestrian survey. Moreover, the Project site is not part of a dedicated cemetery and as such, the likelihood of disturbing human remains is low. However, the possibility of encountering human remains within the Project site exists. Future proposed projects within the surrounding Project area could potentially disturb human remains. With incorporation of MM-CUL-2, impacts associated with human remains would be less than significant. As such, the Project's potential contribution to impacts related to potential to disturb human remains **would not be cumulatively considerable**.

Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Dudek's cultural resources inventory included a records search, NAHC Sacred Lands File search, and site visit with a Native American monitor, none of which identified a known tribal cultural resource within the Project area. Further, the City did not receive any notice that tribal cultural resources were within the Project area through AB 52 consultation requests. As such, Project implementation will not have an adverse change to any known tribal cultural resources. However, there is a potential that unknown (buried) tribal cultural resources may be adversely changed during Project implementation. Cumulative projects within the surrounding Project area could potentially contribute to cumulative adverse changes to tribal cultural resources. As tribal cultural resources are often found along waterways and many of the cumulative projects are near the river, there is a strong possibility that cumulative projects could affect tribal cultural resources. Implementation of MM-CUL-1 would reduce Project impacts associated with accidental damage to currently unrecorded/unknown tribal cultural resources to a level of less than significant. Therefore, the Project's potential contribution to impacts related to unknown tribal cultural resources **would not be cumulatively considerable**.

Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Dudek's cultural resources inventory included a records search, NAHC Sacred Lands File search, and site visit with a Native American monitor, none of which identified a known tribal cultural resource within the Project area. Further, the City did not receive any notice that tribal cultural resources were within the Project area through AB 52 consultation requests. As such, Project implementation will not have an adverse change to any known tribal cultural resources.

However, there is a potential that unknown (buried) tribal cultural resources may be adversely changed during Project implementation. Cumulative projects within the surrounding Project area could potentially contribute to cumulative adverse changes to tribal cultural resources. As tribal cultural resources are often found along waterways and many of the cumulative projects are near the river, there is a strong possibility that cumulative projects could affect tribal cultural resources. Implementation of MM-CUL-1 would reduce Project impacts associated with accidental damage to currently unrecorded/unknown tribal cultural resources to a level of less than significant. Therefore, the Project's potential contribution to impacts related to unknown tribal cultural resources **would not be cumulatively considerable**.

Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Potential cumulative impacts to paleontological resources would result from projects that combine to create an environment where fossils, exposed on the surface, are vulnerable to destruction by earthmoving equipment, looting by the public, and natural causes such as weathering and erosion. The majority of impacts to paleontological resources are site-specific and are therefore generally mitigated on a project-by-project basis. Cumulative projects

would be required to assess impacts to paleontological resources. Additionally, as needed, projects would incorporate individual mitigation for site-specific geological units present on each individual project site. Furthermore, the Project does not propose construction (including grading/excavation) or design features that could directly or indirectly contribute to an increase in a cumulative impact to paleontological resources, as implementation of MM-CUL-3 would ensure any significant paleontological resources uncovered during Project excavations would be properly analyzed and salvaged by the on-site paleontological monitor. Therefore, the Project, in combination with past, present, and reasonably foreseeable future projects in the Project vicinity, would result in less-than-significant cumulative impacts to paleontological resources, and no further mitigation measures are required. Moreover, it is reasonable to assume that potential impacts from implementation of cumulative projects to paleontological resources would be avoided and/or mitigated with implementation of a paleontological mitigation program during excavations into paleontologically sensitive geological units. Therefore, the Project's potential contribution to impacts related to paleontological resources **would not be cumulatively considerable**.

Energy

Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

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

Cumulative projects that could exacerbate the Project's impacts include any projects that could result in wasteful, inefficient, or unnecessary use of energy. However, the City would require cumulative projects, as applicable, to conform to current federal, state, and local energy conservation standards, including the California Energy Code Building Energy Efficiency Standards (24 CCR Part 6), the CALGreen Code (24 CCR Part 11), and SB 743.

As a result, the Project, in combination with other reasonably foreseeable projects, would not cause a wasteful use of energy or other non-renewable natural resources. Therefore, the energy demand and use associated with the Project and cumulative projects would not substantially contribute to a cumulative impact on existing or proposed energy supplies or resources and would not cause a significant cumulative impact on energy resources. Therefore, the Project's contribution to cumulative impacts **would not be cumulatively considerable**.

Greenhouse Gas Emissions

Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of greenhouse gases (GHGs). As previously discussed in Section 4.6.1, Existing Conditions, GHG emissions inherently contribute to cumulative impacts, and thus, any additional GHG emissions would result in a cumulative impact. As discussed in Section 3.2.3 of Appendix B of this EIR, the Sustainable Santee Plan Project Consistency Checklist (Checklist) is the tool for development projects to demonstrate consistency with the City of Santee's (City's) Sustainable Santee Plan, which is a qualified GHG emissions reduction plan in accordance with California Environmental Quality Act (CEQA) Guidelines Section 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. As shown in Table 20 of Appendix B to this EIR, the Project is consistent with the Sustainable Santee Plan Checklist adopted by the City to ensure that the emission targets identified in the Sustainable Santee Plan are achieved. The Sustainable Santee Plan determined that a project consistent with the Checklist would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, the Project would not generate GHG emissions that may have a significant impact on the environment; impacts would be less than significant. Therefore, the Project's contribution to cumulative generation of GHG emissions **would not be cumulatively considerable**.

Hazards and Hazardous Materials

Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Cumulative impacts related to hazards and hazardous materials would result from projects that combine to increase exposure to hazards and hazardous materials. As discussed in Section 4.7, Hazards and Hazardous Materials, the proposed Project would have a less-than-significant impact related to hazardous materials. Past, current, and reasonably foreseeable commercial projects in the region would result in the use and transport of incrementally more oils, greases, and petroleum products for operation purposes. Similar to the Project, cumulative projects would be required to adhere to current laws governing storage, transportation, and handling of hazardous materials. Therefore, the Project's potential contribution to impacts related to hazards associated with routine transport, use, or disposal of hazardous materials **would not be cumulatively considerable**.

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.

As discussed in Section 4.7, Hazards and Hazardous Materials, construction of the Project could involve the transport of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. Construction materials would be used and stored in designated construction staging areas within the Project site boundaries, and materials would be transported and managed in accordance with all federal, state, and local laws regulating the management and use. The Project and any other projects that could involve transport or handling of hazardous substances would involve mandatory compliance with these regulatory requirements to minimize the potential for public safety risks associated with exposure to hazards and hazardous materials. Therefore, the Project's potential contribution to impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment **would not be cumulatively considerable**.

Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

As discussed in Section 4.7, Hazards and Hazardous Materials, Hill Creek Elementary School is located approximately 0.25 miles north of the Project site. As discussed above, the Project would result in less-than-significant impacts related to hazards and hazardous materials because the Project would be required to comply with all applicable federal, state, and local laws regulating the management and use of hazardous materials. Other projects would also be required to follow regulations to properly handle any hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, impacts of emission or handling of hazardous materials within one-quarter mile of an existing or proposed school would be less than significant under the cumulative condition. Therefore, the Project's potential contribution to impacts related to emissions or handling of

hazardous materials within one-quarter mile of an existing or proposed school **would not be cumulatively considerable**.

Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

As discussed in Section 4.7, Hazards and Hazardous Materials, the RWQCB's GeoTracker Database identified two listed sites within the vicinity of the Project site: Western Construction Component (T0608164832), located adjacent to the Project site approximately 0.03 miles to the east, and Circle K #2959 (T0608102609), located approximately 0.20 miles to the south of the Project site. Additionally, the DTSC's Envirostor Database identified one site within the vicinity of the Project site: Ketema Process Equipment Co., C/O Baker Process (71003382), located adjacent to the Project site approximately 0.03 miles to the east. Ketema Process Equipment Co., C/O Baker Process is a Tiered Permit Cleanup Site with no action required as of 1998 (DTSC 2023).

The sites above are facilities located near the Project site that are included in government databases related to hazardous materials; however, these facilities are closed cases and would not have adverse impacts on the Project or any future projects. The Project site is not located on or near a listed hazardous material site. Each cumulative project has been or will be evaluated for proximity to listed sites during project processing. The Project's potential contribution to impacts related to significant hazards to the public or the environment from a hazardous material site **would not be cumulatively considerable**.

Be located within an airport land use plan, be within two miles of a public airport, and would result in a safety hazard or excessive noise for people residing or working in the Project area.

The nearest airport to the Project site is the Gillespie Field Airport, which is located approximately 1.5 miles southwest of the Project site. Additionally, the Project site is located outside of the noise exposure ranges and safety zones for the airport (SDCRAA 2010). The Project site falls within Gillespie Field Review Area 2, which requires limitations on the height of structures (I.e., any proposed object in an area of terrain penetration to airspace surface which has a height greater than 35 feet above ground level). The Project site also falls within the FAA Height Notification Boundary. The Project applicant has received documentation from the FAA stating that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided certain conditions are included in the project (FAA 2023). The applicant has agreed to these conditions. Other projects in the vicinity are required to follow the same FAA regulations; therefore, the Project's potential contribution to impacts related to airspace safety hazards or conflicts **would not be cumulatively considerable**.

Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The Project site would be designed such that adequate emergency access would be provided in accordance with emergency apparatus access requirements. Additionally, all projects in Santee, including the proposed Project, would be required to avoid conflict with the City's Emergency Preparedness Plan and potential emergency evacuation routes in the area. Compliance with applicable Fire and Building Codes, project specific needs assessments, and Fire Protection Technical Report requirements ensures that every project approved for construction includes adequate emergency access. Roads for all proposed projects are required to meet minimum widths, have all-weather surfaces, and be capable of supporting the imposed loads of responding emergency apparatus. The Project and all other future development projects in the service area are subject to review by the City's fire department and would be required to comply with the County Fire Code, other relevant County Code

requirements, and other applicable local codes (e.g., City of Santee Municipal Code) and regulations related to fire safety, building construction, access, fire flow, and fuel modification. Therefore, the Project's potential contribution to impacts related to impairment of an adopted emergency response plan **would not be cumulatively considerable**.

Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

As discussed in Section 4.7, Hazards and Hazardous Materials, the Project would be required to comply with the California Fire Code (CFC) and California Building Code (CBC) standards to reduce the possibility of fires during construction activities. Adherence to City and state regulatory standards during Project construction would reduce the risk of wildfire ignition and spread during construction activities. During operation, the Project would adhere to the City's Municipal Code and the CFC to have and maintain fire protection and life safety systems (CFC Chapter 9). Thus, the Project's short-term construction impacts and long-term operational impacts associated with exposing people or structures to a significant risk of loss, injury, or death involving wildland fires would be less than significant Cumulative projects would also be required to implement similar fire safety features and structure protection features to reduce wildfire-related impacts. Therefore, through compliance with existing regulations associated with wildland fires, impacts associated with wildfire would not be cumulatively considerable. Thus, the proposed project would not result in a cumulatively considerable impact to hazards and hazardous materials. Therefore, the Project's potential contribution to impacts related to wildfire risks **would not be cumulatively considerable**.

Hydrology and Water Quality

Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

The geographic area under consideration for the topic of water quality includes the watershed of the San Diego River (see Figure 4.8-1, San Diego River Watershed). During construction activities, the Project site and cumulative projects would use hazardous materials (e.g., fuel, oil, paint) and an accidental spill of hazardous materials could result in inadvertent releases to surface waters, which could adversely affect surface or groundwater quality. In addition, construction would have the potential to result in local soil erosion during excavation, grading, trenching, and soil stockpiling. Erosion could result in sediment and other pollutants entering surface water bodies and adversely affecting water quality. However, the Project and similar cumulative projects would be required to comply with the Small MS4 Permit and NPDES Construction General Permit and associated SWPPP, designed to prevent impacts to water quality during construction. While it is possible that the Project and cumulative projects that contribute flows to the San Diego River could result in releases of sediment and/or pollutants that could adversely affect water quality, the responsible parties associated with the Project and the other cumulative projects would be required to control runoff and respond to spills to the established regulatory standards from the City of Santee, as discussed in Section 4.8, Hydrology and Water Quality, and in Section 4.7, Hazards and Hazardous Materials, of this Draft EIR. Compliance with water quality regulations would ensure that the cumulative construction impacts would not be considerable.

Once constructed, the stormwater design of the Project and the cumulative projects would incorporate the stormwater management requirements of Chapter 4 and Appendix E of the County of San Diego BMP Design Manual for Permanent Site Design, Stormwater Treatment, and Hydromodification Management (San Diego County BMP Design Manual, County of San Diego Public Works 2020). In addition, Project and cumulative project operations would comply with the City of Santee Guidelines for Surface Water Pollution Prevention, the City's Storm Water Management and Discharge Control Ordinance, and the Small MS4 Permit. As a result, the Project and

cumulative projects would be required to incorporate on-site runoff management infrastructure, water quality BMPs, and adequate connections to the existing stormwater drainage system. Compliance with the San Diego County BMP Design Manual and implementation of City stormwater management measures would ensure that the cumulative operations impacts would not be considerable.

Thus, the Project's potential contribution to impacts related to water quality **would not be cumulatively considerable**.

Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

The geographic area under consideration for the topic of groundwater recharge includes the San Diego River Valley Groundwater Basin. The Project site is currently paved and impervious to groundwater recharge. With the exception of relatively small areas of landscaping, the proposed Project would similarly result in impervious surfaces across the site. As a result, the potential for groundwater recharge would not change with respect to existing conditions and no impacts would occur. Cumulative project development could result in an increase in impervious surfaces and associated decrease in infiltration of rainfall, thus resulting in a minor decrease in groundwater recharge. However, the San Diego River Valley Groundwater Basin is classified as a very low priority basin with respect to the Sustainable Groundwater Management Act (SGMA). Overall, groundwater only accounts for about 5% of the San Diego region's water supply portfolio. Local groundwater supplies are limited by several factors, including little recharge due to sparse rainfall (San Diego County Water Authority 2023; SWRCB 2023). The San Diego River Valley Groundwater Basin only includes five water supply wells, and groundwater only accounts for approximately 4% of the water supply in the basin. Based on the limited impacts to local groundwater supplies, the cumulative groundwater recharge impacts would not be considerable.

The geographic area under consideration for the topic of groundwater supply includes the Santee Groundwater Basin. Domestic water service to the Project site and cumulative sites is provided by the Padre Dam Municipal Water District (PDMWD), which primarily relies on imported surface water from the San Diego County Water Authority. The PDMWD's water supplies also include recycled water and a very small amount of groundwater from one well in the Santee Basin, which supplements the recycled water system. The well is unreliable; therefore, groundwater supplies from the well are assumed to not be available as a future supply, and the PDMWD has no plans for other groundwater supplies in the future. In 2022, groundwater comprised 6% of the water supplies from the San Diego County Water Authority, and by 2045, groundwater is expected to comprise 4% of their water supply. Based on the minor amount of groundwater used by PDMWD as a water source, the water demand for the proposed Project and cumulative projects would not cause or contribute to a cumulatively significant impact related to groundwater supplies.

Thus, the Project's potential contribution to impacts related to groundwater **would not be cumulatively considerable.**

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.

The geographic area under consideration for the topic of drainage includes the watershed of the San Diego River (see Figure 4.8-1, San Diego River Watershed). The stormwater design of the Project and the cumulative projects would incorporate the stormwater management requirements of Chapter 4 and Appendix E of the County of San Diego BMP Design Manual for Permanent Site Design, Stormwater Treatment, and Hydromodification Management (San Diego County BMP Design Manual, County of San Diego Public Works 2020). As a result, the Project and cumulative projects would be required to incorporate on-site runoff management infrastructure, water quality BMPs,

and adequate connections to the existing stormwater drainage system, thus minimizing impacts related to stormwater runoff. Thus, the Project's potential contribution to impacts related to alteration of existing drainage pattern **would not be cumulatively considerable**.

In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

The geographic area under consideration for the topic of flooding includes the watershed of the San Diego River (see Figure 4.8-1, San Diego River Watershed). The Project site has been designed to match the existing contours along the San Diego River as to not impact the existing floodplain, and the Project building will be more than one foot above the floodplain, in accordance with City of Santee Flood Damage Prevention Ordinance, Chapter 11.36. The Project will not impact the FEMA floodplain (FEMA 2024). During processing of the project applications, each cumulative project would be reviewed to determine whether or not it is located within a FEMA 100-year floodplain. Should any of the cumulative projects be located within the floodplain, it would likely need to be revised or have mitigation imposed to reduce potential impacts related to pollutant risk during flooding. Neither the Project nor the cumulative projects are within a tsunami or seiche zone. As a result, cumulative project development would not risk release of pollutants due to project inundation and the Project's potential contribution to impacts related to flooding **would not be cumulatively considerable**.

Land Use and Planning

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.

The proposed Project would be consistent with the site's existing General Plan land use designation and zoning code. Presumably, as development occurs elsewhere throughout the City and the larger San Diego County area, any proposal to change the underlying land use or development intensity for a specific property would be resolved through an amendment to the applicable land use plan. Given that amendments to land use plans are discretionary in nature, any action involving an amendment would be subject to CEQA and reviewed on a case-by-case basis. Should any amendment result in a significant environmental effect, mitigation measures would be identified to reduce those impacts. Given these factors, the Project would not result in any cumulatively considerable land use and planning conflicts in the context of compliance with applicable environmental plans, policies, and regulations beyond those identified in other sections of this EIR. Thus, the Project's potential contribution to impacts related to land use and planning conflicts **would not be cumulatively considerable**.

Noise

Future development within the City, including the Project, would affect the future (cumulative) ambient noise environment. While it is difficult to precisely predict how the ambient noise conditions within the area would change, it is expected that traffic noise levels would increase due to the additional traffic generated by the Project and other development in the City. In the cumulative scenario, ongoing development in the City would be expected to increase the ambient noise environment in the area as a result of increased traffic volumes, increased residential population and commercial activities.

The primary factor for the cumulative noise impact analysis is the consideration of future traffic volumes. Non-transportation noise sources (e.g., Project operation) and construction noise impacts are typically Project-specific and highly localized. Construction activities associated with anticipated development within the area would contribute temporarily to the noise levels in the cumulative ambient noise environment, but in a highly localized

and transient manner. As other development occurs in the area, noise from different types of uses (e.g., traffic, aircraft, fixed noise sources) would continue to combine, albeit on a localized basis, to cause increases in overall background noise conditions within the area. As a result, such sources do not significantly contribute to cumulative noise impacts at distant locations and are not evaluated on a cumulative level.

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by Section 15130 of the State CEQA Guidelines.

Noise in Excess of Standards

Implementation of the Project as well as cumulative development Projects within its vicinity would all be subject to applicable noise standards (descriptions of the standards applicable within the City of Santee are described in Section 4.10, Noise, of this EIR). On this basis, and because noise impacts of the Project with respect to relevant standards would be less than significant, the Project would not contribute to cumulative exceedances of noise standards, and its incremental effect would be a less-than-significant impact.

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.

Temporary/Periodic Increases in Ambient Noise Levels

As discussed in Section 4.10, Noise, the Project would result in temporary noise increases during on- and off-site (e.g., sidewalks and roadway striping) construction activities; however, short-term construction noise of the Project is predicted to be well below the Federal Transit Administration (FTA) guidance of 80 dBA Leq over an 8-hour period, and therefore is less than significant. The construction period of the Project has the potential to overlap with the construction of other development projects in the City. Due to the decrease in noise levels with distance and the presence of physical barriers (i.e., intervening buildings and topography), noise due to construction of other projects would not meaningfully combine with future development under the Project to produce a cumulative noise effect during construction. By way of illustration, if there are two concurrent construction projects of comparable sound emission intensity, and the activity nearest to the studied noise-sensitive receptor is compliant with the City's applicable noise threshold, the other activity could be no closer than three times the distance of the receptor to the nearest activity and not make a cumulatively measurable contribution to the total and still result in a City-compliant noise exposure level. If two concurrent Projects were close to a receptor, the cumulative noise would be one of the following:

- the louder (in dBA) of the two concurrent activities; or,
- a logarithmic sum of the two activity noise levels that, per acoustic principles, cannot be more than 3 dBA greater than the louder of the two individual noise-producing activities.

In sum, cumulative construction noise is likely to be dominated by the closest or loudest activity to the receptor, and the combination will be no more than a barely perceptible difference (i.e., up to a 3 dBA change). Based on the cumulative project list, there are no construction projects that would potentially contribute construction noise that would, in combination with the Project, result in cumulative impacts. Thus, cumulative impacts associated with temporary increases in ambient noise levels would be considered less than significant.

Permanent Increase in Ambient Noise Levels

Off-Site Traffic

As discussed in Section 4.10, Noise, the nearest noise-sensitive receptors to the south of the Project site are already dominated by much higher levels of traffic noise from nearby adjacent roadways such as SR-67, while noise-sensitive receptors to the north of the Project site are occluded from the project driveway by intervening buildings and terrain. Therefore, potential impacts at existing off-site noise-sensitive land uses along roadway segments identified (see Table 4.10-7 in Section 4.10) and with respect to project-generated changes to future traffic noise would be less than significant. Future development from implementation of the Project along with other cumulative projects would generate off-site traffic noise. When calculating future traffic impacts, the traffic study included traffic attributed to both the Project and cumulative projects. Thus, future traffic noise prediction results with and without the Project already account for the cumulative impacts from cumulative projects contributing to traffic increases. Since the noise impacts are generated directly from the traffic analysis results, the existing traffic with and without Project predicted increases in traffic noise levels described already reflect cumulative impacts (see the Noise Technical Report, included as Appendix K to this Draft EIR. As described herein, the noise level increases associated with both of these scenarios would not exceed applicable standards. As such, anticipated increases would be below the significance thresholds; hence, the incremental effect of the Project on off-site traffic noise is not cumulatively considerable.

Stationary Sources

As discussed in Section 4.10, Noise, of this EIR, noise from operation of stationary mechanical equipment added to the outdoor ambient sound environment as a result of Project implementation would include permanent on-site noise sources (e.g., rooftop HVAC equipment and exhaust ports). A cumulative impact could occur if noise produced from such sources due to implementation of the Project were to combine with noise produced from the operation of other cumulative projects in the vicinity to create a cumulatively significant permanent increase in ambient noise levels. However, noise emission from HVAC equipment and exhaust attenuates with distance and can be occluded by structures and terrain. Additionally, the operation of the Project, along with the operation of other cumulative projects, would be subject to applicable requirements from the City's noise ordinance, which limits the exterior noise levels at residences. Hence, for these two reasons, cumulative impacts to outdoor ambient noise levels resulting from Project stationary sources would be less than significant.

Thus, the Project's potential contribution to impacts related to temporary or permanent increases in ambient noise levels **would not be cumulatively considerable**.

Result in generation of excessive groundborne vibration or groundborne noise levels.

Ground-borne vibration attenuates very rapidly with distance. For example, at 25 feet from an operating heavy dozer the reported vibration level is 0.089 ips PPV; at a distance of 50 feet the vibration level would be 0.03 inch per second (ips) peak particle velocity (PPV); at 200 feet the vibration level would be 0.004 ips PPV. No portion of the Project construction limits would be closer than approximately 0.6 miles from any of the cumulative Projects. With a Project construction-related vibration contribution of no greater than 0.004 ips PPV added to construction vibration levels occurring at the nearest cumulative Project sites, there would be a less than significant impact**.** Thus, the Project's potential contribution to impacts related to generation of excessive ground-borne vibration or ground-borne noise levels **would not be cumulatively considerable.**

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, expose people residing or working in the Project area to excessive noise levels.

There are no private airstrips within the vicinity of the Project site. The closest airport to the proposed Project site is the Gillespie Field regional airport, approximately 1.5 miles southwest of the Project boundary. Several nearby Projects in the cumulative project list (Table 6-2 above) are also located within 2 miles of a public airport; however, operations from the public airport do not affect the noise exposure for the Project. Therefore, noise associated with aircraft overflights for any of the cumulative projects would be less than significant, and the Project's contribution would **not be cumulatively considerable**.

Public Services and Recreation

Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection and police services.

As described in Section 4.11, Public Services and Recreation, of this EIR, the Project would result in no impact related to adverse physical impacts or performance objectives associated with schools, parks, or other facilities (e.g., libraries, etc). Therefore, the Project would not contribute to cumulative impacts to these services and is not discussed further.

As discussed in Section 4.11, the Project would potentially result in a slight, incremental increase in calls to the fire and/or police department for service to the Project site in comparison to the existing conditions; however, the increase is expected to be nominal and would not result in the need for the construction of new facilities. Nonetheless, similar to other development projects in the City, the Project applicant would still be required to pay their fair share of development impact fees to help offset incremental impacts to fire and police services. Thus, the Project's impact on fire and police services is considered less than significant. Cumulative growth within the City could result in a need for additional fire and police protection services to serve new development. It is expected that cumulative projects would also be required to pay a fair share of development impact fees to the City prior to the issuance of building permits. These fees would help offset incremental impacts to resources and facilities by helping to fund capital projects, as needed. When staff and facilities are expanded to serve future development in the Project area and surrounding cities, any physical expansion or alteration of facilities would be subject to environmental review. Therefore, the Project's contribution to any such impacts **would not be cumulatively considerable**.

Transportation

Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

As described under cumulative discussion for Land Use and Planning above, the proposed Project would be consistent with the site's existing General Plan land use designation and zoning code, The Project's Transportation Impact Study (TIS) evaluated cumulative projects in the area to analyze a Near Term Cumulative and also analyzed a Horizon Year consistent with City's General Plan Mobility Element and demonstrated consistency with City's General Plan goals and policies. The roadway and intersection improvements for cumulative conditions have been

outlined in the project's TIS (Appendix L of this EIR) to improve vehicular, bike and pedestrian mobility conditions in the study area outlined for the Project. Similarly, all cumulative projects would be evaluated to provide improvements for the circulation system and be required to demonstrate consistency with the General Plan's adopted policies, plans, or programs regarding circulation, active transportation, or public transit facilities. Therefore, the Project's contribution to impacts related to a program, plan, ordinance, or policy related to addressing the circulation system **would not be cumulatively considerable**.

Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

If a project is consistent with the assumptions in the SANDAG 2021 Regional Plan, the existing conditions project-level analysis is sufficient to determine cumulative impacts. If a project is not consistent with the assumptions in the SANDAG 2021 Regional Plan, a cumulative analysis may be necessary. A project effect on vehicle miles travelled (VMT) under cumulative conditions would be considered significant if the cumulative VMT/capita or VMT/employee under the future year "plus project" condition exceeds the base year thresholds (i.e., 18.9).

The project is consistent with the General Plan land use designation and zoning for the project site and would provide employment as proposed in the traffic analysis zone. The VMT/employee under Year 2035 or cumulative conditions is 20.1, which exceeds the existing threshold of 18.9 VMT per employee. Therefore, it can be concluded that the project would also result in a significant cumulative impact. **MM-TRA-1 Trip Reduction Program,** would be implemented by the project's tenants to reduce the project's VMT. Because the Project's VMT would not be reduced to below significance threshold even with the implementation of **MM-TRA-1**, the Project's incremental contribution to VMT impact would be **cumulatively considerable**; therefore, the Project's contribution to VMT impacts would be a **significant and unavoidable cumulative impact**.

Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Cumulative projects would be required to comply with all applicable local provisions related to roadway design hazards, and access driveways would be constructed in accordance with City's manual on Design Standards and Standard Drawings (April 2014). As shown in Section 4.12, the project access at Woodside Avenue and N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection has been evaluated for Near Term and Horizon Year without and with Project conditions which includes traffic generated by cumulative projects in the area and recommendations for improvement to lane geometry and bike and pedestrian facilities. The proposed improvements at the project access and implementation of Project Design Feature **PDF-TRA-1 Multi-modal Intersection Improvements** at the N. Woodside Avenue/S. Woodside Avenue - SR-67 SB Off-Ramp intersection would reduce hazards due to geometric design features in cumulative conditions. Therefore, the Project would not increase hazards due to geometric design features or incompatible use under cumulative conditions and **would not be cumulatively considerable**.

Result in inadequate emergency access.

Adequate emergency access and compliance with emergency access and design standards would be ensured by the City and responsible emergency service agencies for all cumulative projects in the vicinity of the project. Similar to the Project's access driveway intersection, access to cumulative projects would be designed in accordance with City standards, reviewed by City's Fire Department and San Diego County Sheriff, and would be accessible to emergency responders during construction and operation of each cumulative project. Therefore, impacts related to

inadequate emergency access would be less than significant under cumulative conditions and **would not be cumulatively considerable**.

Utilities and Service Systems

Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

As discussed in Section 4.13, Utilities and Public Services, existing utility service lines are located within the vicinity of the Project site and would be reconfigured from their current locations on and nearby the Project site to the proposed building. This also includes a new 8-inch line for wastewater to connect to existing lines nearby the project site. However, the Project would not require the construction, expansion, or relocation of facilities beyond the reconfiguration of hookup to the onsite proposed building because existing facilities are in-place and adequately sized to accommodate the Project. Therefore, no adverse physical effects beyond those already disclosed in this Draft EIR would occur as a result of implementation of the Project's proposed utility system connections, and the impact is considered less than significant. Similar to the project, cumulative projects would be required to comply with local and State requirements associated with utility infrastructure, which would reduce any potential environmental effects to less-than-significant levels. Therefore, the Project's contribution to potential environmental effects associated with infrastructure construction or relocation of cumulative projects **would not be cumulatively considerable**.

Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.

As discussed in Section 4.13, Utilities and Public Services, implementation of the Project would result in the construction of an industrial warehouse with associated office spaces, surface parking, and loading areas. According to CalEEMod (Appendix B of this Draft EIR), the proposed Project is estimated to result in an increase in potable water demand of 97,145 gallons per day (gpd), which is equivalent to approximately 108.8 acre-feet per year (AFY). As provided in Table 4.13-1 of this EIR, sufficient water supply is anticipated to meet current and projected water demands through 2045 during normal-, historic single-dry-, and historic multiple-dry-year periods. Given that PDMWD has adequate existing supplies to serve the Project under normal-, historic single-dry-, and historic multiple-dry-year periods, the Project's impact to water supply would be less than significant. Similar to the Project, cumulative projects would also be required to demonstrate sufficient water supplies are available to serve each project. As such, the Project's contribution to cumulative impacts related to water supply **would not be cumulatively considerable**.

Result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

As discussed in Section 4.13, Utilities and Public Services, wastewater generated by the Project would be treated at either the WRF or the PLF and projected wastewater from the Project (0.097 mgd) would represent approximately 0.15% of the remaining capacity of the WRF and PLF treatment facilities. Therefore, impacts associated with wastewater treatment capacity would be less than significant. Similar to the Project, cumulative projects would be required to demonstrate whether these wastewater providers would have adequate capacity to meet projected demand of the project in order to serve each cumulative project. As such, the Project's contribution to cumulative impacts related to wastewater treatment capacity **would not be cumulatively considerable**.

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.

As discussed in Section 4.13, Utilities and Public Services, the Project's total estimated demolition debris to be hauled offsite would be approximately 257.3 tons of demolition waste per day of construction activity and the Project's total building construction waste would generate approximately 1.13 tons per day during construction activities. The Sycamore Landfill accepts inert solid waste, has a daily maximum permitted throughput of 5,000 tons/day, has a remaining capacity of 113,972,637 cubic yards, and is expected to remain open for another 18 years (CalRecycle 2019). Therefore, the Project's daily peak demolition and construction waste delivery of 258.4 tons could be received by the Sycamore Landfill. Thus, Project demolition and construction would not 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.

Once operational, the Project would produce solid waste on a regular basis associated with operation and maintenance activities. Using CalEEMod waste generation factors for the Industrial Park and Warehouse uses, the Project would generate approximately 141 tons of solid waste per year, or 0.4 tons per day, and a minimum of 50% of all solid waste would be required to be recycled pursuant to AB 939, consistent with the State's solid waste reduction goals; therefore, the Project would generate approximately 0.2 tons per day of solid waste requiring disposal at a landfill. The increase of waste generated by the Project during operations would represent approximately 0.004% of the total daily capacity permitted at the landfill and is expected to remain open for another 18 years. Once the Sycamore Landfill reaches capacity, additional landfills and strategies would be identified, so that disposal needs continue to be met. Further, there are landfills within the County with up to 35 years of remaining life. For example, the Las Pulgas Landfill is expected to remain open another 35 years (CalRecycle 2023). As such, in the event of the closure of the Sycamore Landfill, other landfills in the region would be able to accommodate solid waste from the Project, and regional planning efforts would ensure continued landfill capacity in the foreseeable future. Therefore, the Project would not 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. Similar to the Project, cumulative projects would be required to comply with State and local standards regarding construction and operational waste and would be required to demonstrate whether nearby landfills have adequate capacity to meet projected demand. As such, the Project's contribution to cumulative impacts related to solid waste generation **would not be cumulatively considerable**.

Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

As described above, solid waste from the Project would be transported to the Sycamore Landfill. This facility is regulated under federal, state, and local laws. Additionally, the City of Santee is required to comply with the solid waste reduction and diversion requirements set forth in AB 939, AB 341, AB 1327, and AB 1826. Per AB 341, businesses that generate 4 cubic yards or more of organic waste per week are required to arrange for organic waste recycling services. In addition, waste diversion and reduction during Project construction and operations would be completed in accordance with CALGreen standards and City diversion standards. As a result, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste and impacts would be considered less than significant. Similar to the Project, cumulative projects would be required to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. As such, the Project's contribution to cumulative impacts related to solid waste **would not be cumulatively considerable**.

Wildfire

Substantially impair an adopted emergency response plan or emergency evacuation plan.

The Project site would be designed such that adequate emergency access would be provided in accordance with emergency apparatus access requirements. Additionally, all related projects would be required to avoid conflict with the County Hazard Mitigation Plan and County Emergency Operations Plan and potential emergency evacuation routes in the area. Similar to the Project, compliance with the applicable Fire and Building Codes, along with Project specific needs assessments and Fire Protection Technical Report requirements, ensure that every project approved for construction includes adequate emergency access. Roads for all proposed projects are required to meet minimum widths, have all-weather surfaces, and be capable of supporting the imposed loads of responding emergency apparatus. The Project and all other future development projects in the service area would be subject to review by the Santee Fire Department and would be required to comply with all applicable State and County Building and Fire Code requirements and other applicable local codes (e.g., City of Santee Municipal Code) and regulations related to fire safety, building construction, access, fire flow, and fuel modification. Therefore, the Project's contribution to cumulative impacts related to impairment of an adopted emergency response or evacuation plan **would not be cumulatively considerable**.

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.

The cumulative context considered for wildfire impacts is San Diego County, and more specifically, the San Diego River watershed, which encompasses 434 square miles (Appendix G). As discussed in Section 4.14, Wildfire, CAL FIRE has mapped areas of fire hazards in the state based on fuels, terrain, weather, and other relevant factors. The Project site is not within a Very High Fire Hazard Severity Zones (VHFHSZ), but there is a VHFHSZ within a Local Responsibility Area (LRA) located directly adjacent to the Project site to the north and east (CAL FIRE 2023). The Project site is fully developed and the surrounding area does not contain slopes typical of exacerbating wildfire risk.Once redeveloped with the proposed Project, the Project site would not result in steep slopes typical of exacerbating wildfire risk. It is also not anticipated that the Project and associated landscaping proposed would exacerbate wildfire risk due to prevailing winds. As such, Project impacts would be less than significant. The Project, combined with other projects in the region, would increase the population and/or activities and potential ignition sources in the area, which may increase the potential of a wildfire and increase the number of people and structures exposed to risk of loss, injury, or death from wildfires. However, all future projects would be required to comply with applicable fire and building codes, which have been increasingly strengthened as a result of severe wildfires that have occurred in the last two decades. The fire and building codes include fire prevention and protection features that reduce the likelihood of a fire igniting on a site and spreading to off-site vegetated areas. Therefore, the Project's contribution to impacts related to slope, prevailing wind, or other factors contributing to exacerbating wildfire risk and exposing project occupants **would not be cumulatively considerable**.

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

The Project would include reconfiguration of existing service utilities, including two new Fire department connections, one in the southeast and one in the northwest corner of the building. As the reconfiguration and upgrades would be on the Project site, the Project would not result in off-site impacts. The Project and all other future development projects in the service area would be subject to review by the fire department and would be required to comply with

the County Fire Code and other relevant County Code requirements and other applicable local codes (e.g., City of Santee Municipal Code) and regulations related to fire safety, building construction, access, fire flow, and fuel modification. Therefore, the Project's contribution to impacts related to maintenance or installation of associated infrastructure on fire risk **would not be cumulatively considerable**.

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

The Project site has been designed to match the existing contours along the San Diego River as to not impact the existing floodplain. Future drainage conditions would be very similar to existing drainage conditions. Adequate stormwater conveyance would be maintained and runoff rates would be decreased by capturing stormwater in proposed on-site storm drains and water quality basins. The Project area is relatively flat, and it is not anticipated that cumulative projects would combine to result in significant wildfire impacts related to slope, prevailing winds, downstream flooding or landslide, slope instability, or drainage changes. Additionally, as mentioned in Hydrology and Water Quality above, each cumulative project would be reviewed to determine whether or not it is located within a FEMA 100-year floodplain. The Project site is not within the FEMA floodplain (FEMA 2024). Therefore, the Project contributions to impacts related to exposing people or structures to significant risks as a result of runoff, post fire instability, or drainage changes **would not be cumulatively considerable**,

6.2 Growth-Inducing Impacts

As stated in Section 15126.2(e) of the California Environmental Quality Act (CEQA) Guidelines, an EIR is required to include a discussion of a project's growth-inducing effects. The CEQA Guidelines generally describe such effects as follows: (1) fosters economic growth, population growth, or construction of additional housing in the surrounding environment; (2) removes obstacles to population growth (e.g., a major expansion of a wastewater treatment facility that allows for more construction in the service area); (3) increases in population that tax existing services requiring construction of new facilities that could cause significant environmental effects; and (4) encourages and facilitates other activities that could significantly affect the environment, either individually or cumulatively.

The proposed Palisade Santee Commerce Center Project would require a temporary construction workforce and a permanent operational workforce, both of which could potentially induce population growth in the Project area. The temporary workforce would be needed to construct the one industrial/warehouse building and associated improvements. The number of construction workers needed during any given period would largely depend on the specific stage of construction but would likely range from a dozen to several dozen workers on a daily basis.

Because the future tenants are not known yet, the number of jobs that the Project would generate cannot be precisely determined. Thus, for purposes of analyses, employment estimates were based on Institute of Transportation Engineers trip generation data and industry standards for number of employees per 2,000 sf of warehouse area (London Moeder Advisors 2023). The Project would include 300,145 square feet of industrial/warehouse space. Permanent employment at the completed commerce center is expected to generate 185 direct new jobs (London Moeder Advisors 2023).

According to the City of Santee, as of 2020, the population of the City of Santee (City) was approximately 58,000 residents (City of Santee 2023). The San Diego Association of Government (SANDAG) anticipates the City will grow to more than approximately 63,812 residents by the year of 2035 (City of Santee 2022). As such, the Project-related increase of 185 permanent direct employees would represent a nominal percentage of the City's projected future population upon General Plan buildout. As such, the Project's permanent employment requirements could

likely be met by the City's existing labor force without people needing to relocate into the Project region, and the Project would not stimulate population growth or a population concentration above what is assumed in local and regional land use plans.

Projects that physically remove obstacles to growth, or projects that indirectly induce growth, are those that may provide a catalyst for future unrelated development in the area. The Project would involve removing and replacing an existing segment of 12-inch diameter water main with a new, 16-inch water main at the Project site. The purpose of the larger water main onsite is solely to serve the needs of the Project, and not to provide capacity for future projects or growth. In addition, since the surrounding Project area is already served by existing wet and dry utilities, the Project would not expand sanitary sewer or stormwater drainage infrastructure into areas not previously served by such utilities.

Further, given that the surrounding Project area is already served by existing wet and dry utilities, it is unlikely that the Project would tax existing community service facilities or require construction or expansion of new regional-scale facilities with capacity to serve more than just the Project. Although roadway improvements are planned as part of the Project, the construction of these roadways is necessary to provide for adequate circulation in the Project area; thus, the Project would not result in indirect population growth by providing vehicular access to an area presently lacking such access.

Based on the proximity of the Project site to existing facilities, the average response times in the Project area, the ability for nearby cities to respond to emergency calls, and the fact that the Project site is already located within the Santee Fire Department and Santee Sheriff's Department service areas, the Project would be adequately served by public services without the construction of new, or the expansion of existing, facilities. Although the Project could potentially result in an incremental increase in calls for service to the Project site compared to existing conditions, this increase is expected to be nominal (as opposed to new residential or commercial/retail land uses, which result in greater calls for service) and would not result in the need for new or expanded fire or police facilities. Lastly, since the Project would not directly or indirectly induce unplanned population growth in the City, it is not anticipated that many people would relocate to the City as a result of the Project, and an increase in school-age children requiring public education is not expected to occur as a result. Thus, the need for new or expanded school facilities is not required.

In conclusion, the Project could cause population growth through new job opportunities. However, this growth falls well within City and regional growth projections for population and housing. The Project would not remove obstacles to population growth and would not cause an increase in population such that new community facilities or infrastructure would be required outside of the Project site. Lastly, the Project is not expected to encourage or facilitate other activities that could significantly affect the environment, as explained above. For these reasons, the Project is not considered to be significantly growth inducing.

6.3 Significant Irreversible Changes

The CEQA Guidelines require that an EIR address any significant irreversible changes that would be caused by implementation of a project. According to CEQA Guidelines Section 15126.2(d), such a change would involve one or more of the scenarios discussed below;

6.3.1 Change in Land Use that Commits Future Generations to Similar Uses

According to the City's General Plan and the City's Zoning Map, the land use and zoning designations for the Project site are Light Industrial (IL) (City of Santee 2003, 2017). The proposed Project would be consistent with Chapter 13.14.020 of the City's Municipal Code, which states that this land use designation is "intended primarily for light industrial uses such as manufacturing, assembly, research and development and similar industrial uses, as well as limited commercial and office uses which are compatible and appropriate in this district". The zoning is consistent with the Light Industrial land use designation of the General Plan (City of Santee 2003). As such, although construction of the Project would develop a total of 300,145 square feet of industrial/warehouse space on the Project site, the City already committed the site to industrial/warehouse (and similar) uses when the City designated and zoned the site as Light Industrial (LI) (City of Santee 2003, 2017).

Land uses surrounding the Project site primarily consist of light industrial uses, along with some scattered commercial, residential, and utility uses. General Industrial/Residential land use and zoning designations are located within approximately .5 miles of the Project site, with General Industrial located on the northern side of the Project site and Residential on the southern side of the site. Since the Project site is located within an existing urbanized area, including adjacent to other industrial uses, the Project would not result in land use changes that would commit future generations to uses that do not occur in the Project area. Thus, implementation would not commit future generations to new uses, given that this proposed use is already found in the project area.

6.3.2 Irreversible Damage from Environmental Accidents

Potential environmental accidents of concern include those events that would adversely affect the environment or public due to the type of quantity of materials released and the receptors exposed to that release. Construction activities associated with the Project would involve some risk of environmental accidents. However, these activities would be conducted in accordance with all applicable federal, state, and local regulations, and would follow professional industry standards for safety. Once operational, any materials associated with environmental accidents would comply with applicable federal, state, and local regulations. Use of any such materials would not be expected to cause irreversible damage due to the type or quantity of materials released and the receptors exposed to that release.

6.3.3 Large Commitment of Nonrenewable Resources

Commitment of nonrenewable resources includes issues related to increased energy consumption, loss of agricultural lands, and lost access to mining reserves. There would be an irretrievable commitment of labor, capital, and materials used during the construction and operation of the Project. Nonrenewable resources would primarily be committed in the form of fossil fuels such as fuel, oil, natural gas, and gasoline used by equipment associated with construction of the Project. Consumption of other nonrenewable or slowly renewable resources would also occur. These resources would include lumber and other forest products, sand and gravel, asphalt, and metals such as steel, copper, and lead. However, the amount and rate of consumption of these resources would not result in significant environmental impacts because warehouse development is not associated with an unnecessary, inefficient, or wasteful use of resources.

To ensure that energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (California Public Resources Code Section 21100[b][3]). Energy conservation implies that a project's cost-effectiveness be reviewed not only in dollars, but also in terms of energy requirements. For many projects, cost-effectiveness may be determined more by energy efficiency than by initial dollar costs. A lead agency may consider the extent to which an energy source serving a project has already undergone environmental review that adequately analyzed and mitigated the effects of energy production.

Consistent with California Public Resources Code Section 211009(b)(3), CEQA Guidelines Appendix G, and a ruling set forth by the court in *California Clean Energy Committee v. City of Woodland*, potentially significant energy implications of a project must be considered in an EIR to the extent relevant and appliable to that project. Accordingly, based on the energy consumption thresholds set forth in both Appendix F and Appendix G of the CEQA Guidelines, the Project's estimated energy demands (both short-term construction and long-term operational demands) were evaluated (see Section 4.5, Energy, of this EIR). The overall purpose of the energy analysis was to evaluate whether the Project would result in the wasteful, inefficient, or unnecessary consumption of energy.

As further assessed in the energy analysis, for new development, such as that proposed by the Project, compliance with California Title 24 energy efficiency requirements is considered demonstrable evidence of efficient use of energy. The Project would provide for and promote energy efficiencies beyond those required under other applicable federal and state standards and regulations, and in doing so would meet or exceed all Title 24 standards. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy.

6.4 Significant and Unavoidable Impacts

Pursuant to CEQA Guidelines Section 15126.2(c), an EIR must address any significant environmental impacts, including those that can be mitigated but not reduced to less than significant as a result of implementation of a project. As discussed throughout Chapter 4, Environmental Analysis, of this EIR, at the Project and cumulative levels, the Project would result in significant and unavoidable impacts related to cultural resources (historical resources only) and transportation (VMT only). For all other environmental issue areas, the Project would result in either less-than-significant impacts with mitigation, less-than-significant impacts, or no impact.

7 Alternatives

7.1 Alternatives to the Proposed Project

In accordance with CEQA Guidelines Section 15126.6, this EIR chapter contains a comparative evaluation of the Palisade Santee Commerce Center Project with alternatives to the Project, including a No Project Alternative. Consistent with CEQA Guidelines Section 15126.6, this chapter focuses on alternatives to the Project that are capable of avoiding or substantially reducing any significant adverse impacts associated with the Project, even if the alternatives may impede attainment of Project objectives or prove less cost efficient. In addition, implementation of a Project alternative may potentially result in new impacts that would not have resulted from the Project.

The CEQA Guidelines require that the analysis of alternatives provide sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with a proposed project. Specifically, CEQA Guidelines Section 15126.6(a) outlines the scope of alternatives to a proposed project that must be evaluated:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Under case law and CEQA Guidelines Section 15126.6(f), the discussion of alternatives is subject to a rule of reason and need not be exhaustive. CEQA Guidelines Section 15126.6(d) states that "if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternatives shall be discussed, but in less detail than the significant effects of the project as proposed." Determining factors that may be used to eliminate alternatives from detailed consideration in an EIR are (a) failure to meet most of the basic project objectives, (b) infeasibility, or (c) inability to avoid significant environmental impacts. CEQA Guidelines Section 15364 defines "feasibility" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

An EIR need not consider a project alternative whose effects cannot be reasonably ascertained, whose implementation is remote and speculative, or whose execution does not substantially lessen or avoid the significant effects of a proposed project.

As discussed throughout Chapter 4, Environmental Analysis, and Chapter 6, Other CEQA Considerations, of this EIR, at the project and cumulative levels, the Project would result in significant and unavoidable cultural resources and transportation impacts. For all other environmental issue areas, the Project would result in less than significant impacts with mitigation incorporated, less-than-significant impacts, or no impact.

7.2 Considerations for Selection of Alternatives

Project Objectives

Section 15124(b) of the CEQA Guidelines requires that an EIR include a statement of the project objectives that "include the underlying purpose of the project and may discuss the project benefits." The following objectives have been identified for the Project:

- **Objective 1:** Establish a jobs-producing and tax-generating commerce center land use near transportation corridors that is constructed to high standards of quality and provides diverse economic opportunities for those residing and wishing to invest within the City of Santee.
- **Objective 2:** Develop a high-quality development for uses in Santee that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar developments in the local area and region.
- **Objective 3:** Develop a facility within the East County region of San Diego County and in close proximity to SR-52 and SR-67 that can be used as part of the Southern California supply chain and goods movement network.
- **Objective 4:** Create a fiscally sound and employment-generating project within an established industrial area.
- **Objective 5:** Concentrate non-residential uses in areas designated for industrial uses which are near existing roadways, highways, and freeways in an effort to isolate and reduce any potential environmental impacts related to truck traffic congestion, air emissions, and industrial noise to the greatest extent feasible.

Summary of Project Impacts

Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant adverse effects of the Project identified throughout this EIR. The following is a summary of significant impacts associated with the proposed Project:

Biological Resources

Direct impacts to nesting birds, specifically nesting bird habitat, protected under Section 3503 of the California Fish and Game Code, could occur within areas of the Project site mapped as non-native woodland or within the existing ornamental trees as part of the current development's landscaping. Therefore, with implementation of Mitigation Measure *(MM) BIO-1 and BIO-4*, direct impacts to nesting birds or their habitat would be less than significant. **(Less Than Significant with Mitigation Incorporated).**

Construction-Related: Potential short-term or temporary indirect impacts to least Bell's vireo, yellow-breasted chat, yellow warbler, and special-status plant species resulting from construction activities, With implementation of *MM-BIO-1 (Pre-Construction Nesting Bird Survey) and MM-BIO-2 (Construction-Related Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources)*, the effect of construction-related indirect impacts to least Bell's vireo, yellow-breasted chat, yellow warbler, and special-status plant species would be less than significant. **(Less Than Significant with Mitigation Incorporated)**

Long-Term: Potential long-term, indirect impacts could result from Project implementation to suitable foraging and nesting habitat for least Bell's vireo, yellow-breasted chat, and yellow warbler and special-status plants. With implementation of *MM-BIO-3 (Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources)*, the effect of potential long-term indirect impacts to least Bell's

vireo, yellow-breasted chat, yellow warbler, and special-status plant species would be reduced to less than significant. **(Less Than Significant with Mitigation Incorporated)**

Construction-related: Sensitive vegetation communities and/or the San Diego River wildlife corridor may be indirectly impacted during construction of the proposed Project. Implementation of *MM-BIO-2 (Construction-Related Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources)* would minimize the effect of construction-related indirect impacts to sensitive vegetation communities and/or wildlife corridors to less than significant**. (Less Than Significant with Mitigation Incorporated)**

Long-Term: Potential long-term, indirect impacts could result from development near sensitive vegetation communities and/or the San Diego River wildlife corridor that could degrade habitat; increase invasive plant species that may degrade habitat; and trampling of vegetation and soil compaction by humans, could affect soil moisture, water penetration, surface flows, erosion, and wildlife corridors. Implementation of *MM-BIO-3 (Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources*) would minimize the effect of long-term indirect impacts to sensitive vegetation communities to less than significant. **(Less Than Significant with Mitigation Incorporated)**

Construction-Related: Jurisdictional aquatic resources of the United States/state may be indirectly impacted during construction. Potential short-term or temporary indirect impacts to jurisdictional aquatic resources resulting from construction activities could include the generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; the release of chemical pollutants; and unintentional clearing, trampling, or grading outside of the proposed construction zone. Construction-related indirect impacts to jurisdictional aquatic resources would be potentially significant absent mitigation. Implementation of *MM-BIO-2 (Construction-Related Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources)* would minimize construction-related indirect impacts to jurisdictional aquatic resources to less than significant. **(Less Than Significant with Mitigation Incorporated)**

Long-Term: Potential long-term indirect impacts that could result from development near jurisdictional aquatic resources of the United States/state include pollutants that could degrade water quality and habitat; increased invasive plant species that may degrade habitat; and trampling of vegetation and soil compaction by humans, which could affect soil moisture, water penetration, surface flows, and erosion. Long-term indirect impacts to jurisdictional aquatic resources would be potentially significant absent mitigation. Implementation of *MM-BIO-3 (Long-Term Indirect Impacts to Special-Status Species, Sensitive Vegetation Communities, and Jurisdictional Aquatic Resources)* would minimize long-term indirect impacts to jurisdictional aquatic resources to less than significant. **(Less Than Significant with Mitigation Incorporated)**

The proposed site plan would require removal of 109 trees, encroachment upon 24 trees, and preservation of 7 trees. As such, tree replacement would occur at a 1:1 mitigation ratio with 15-gallon trees, as directed by *MM-BIO-4*. Additionally, measures to minimize damage to the encroachment and preserved trees, as well as recommendations for long-term maintenance and care for trees that will be retained on site, would be included in the Project's Landscape Plan. With implementation of *MM-BIO-4*, the proposed Project would comply with the Urban Forestry Ordinance, and impacts would be less than significant. **(Less Than Significant with Mitigation Incorporated)**

Cultural, Tribal Cultural, and Paleontological Resources

As explained in the Historic Assessment (Appendix F), the Former Drive-In Theatre has been conservatively determined to embody the distinctive characteristics of a type, period, and method of drive-in movie theatre

construction during the 1960s-1970s. Therefore, the Former Drive-In Theatre on the Property is conservatively determined to be eligible for listing in the National Register of Historic Places and the California Register of Historical Resources and is conservatively assumed to be a historical resource under CEQA (CEQA Guidelines §15064.5(a)(3)), and the demolition of the Former Drive-In Theatre would result in a substantial adverse change in the significance of a historic resource. With implementation of *MM-HIS-1, MM-HIS-2, MM-HIS-3, and MM-HIS-4*, the Project's historic resource impact would not be reduced below significance threshold. Therefore, the impact would remain significant and unavoidable. **(Significant and Unavoidable)**

As explained in the Historic Assessment (Appendix F), the Former Drive-In Theatre on the Project site has been determined to embody the distinctive characteristics of a type, period, and method of drive-in movie theatre construction during the 1960s-1970s. Implementation of *MM-HIS-1 through MM-HIS--4* would partially mitigate the project's impacts on this historic resource, though not to a less than considerable level. Because the project would result in the loss of a historic resource, the project's incremental contribution to loss of historic resources would be cumulatively considerable; therefore, the Project's contribution to the loss of historical resources would be a significant and unavoidable cumulative impact. **(Significant and Unavoidable Cumulative Impact)**

In the unexpected event that human remains are unearthed during construction activities, impacts would be potentially significant. With implementation of MM-CUL-2, potential impacts associated with human remains would be less than significant. **(Less Than Significant with Mitigation Incorporated)**

No responses to the AB 52 outreach letters to tribal contacts were received by the City requesting consultation. Although information regarding TCRs has been received by the City, the archaeological sensitivity of the Project site is considered to be moderate. For this reason, the Project site should be treated as potentially sensitive for archaeological resources, and Mitigation Measure *MM-CUL-1* is required to reduce potential impacts to unanticipated discovery of cultural resources and TCRs. With implementation of *MM-CUL-1,* potential impacts associated with any buried, currently unrecorded/unknown tribal cultural resources would be less than significant. **(Less Than Significant with Mitigation Incorporated)**

As demonstrated in Appendices G and H, no paleontological resources were identified within the Project site, and the Project site is not anticipated to be underlain by unique geologic features. With implementation of Mitigation Measure MM-CUL-3, potential impacts related to unanticipated discovery of paleontological resources would be less than significant. **(Less Than Significant with Mitigation Incorporated)**

Transportation

The Project would generate VMT in excess of the significance threshold. Since the Project's daily trip generation estimate would be below 2,400 average daily trips, and the Project's census tract includes other employee-based uses, a project-specific model run by SANDAG would not be required. The results of the SANDAG SB 743 VMT maps have been used in the Project's VMT analysis. Compared to the regional mean of 18.9 VMT per employee, the VMT per employee of the Project's census tract is 22.2 VMT. Because the Project's VMT is higher than the regional average of the census tract it is located within, the Project would result in a significant VMT impact. A VMT reduction of 11.3% would be achieved through the implementation of CTR measures. A reduction of 15% is required to reduce the VMT per employee to at or below regional level. Implementation of *MM-TRA-1* (Trip Reduction Program) and *MM-TRA-2* (Construction of Sidewalk) would reduce the Project's VMT but not below significance threshold even with the implementation of *MM-TRA-1* and *MM-TRA-2*, the Project's VMT impact would remain significant and unavoidable. **(Significant and Unavoidable Impact)**

The Project is consistent with the General Plan land use of the Project site and would provide employment as proposed in the traffic analysis zone. The VMT/employee under Year 2035 or cumulative conditions is 20.1, which exceeds the existing threshold of 18.9 VMT per employee. Therefore, it can be concluded that the Project would also result in a significant cumulative impact. *MM-TRA-1* (Trip Reduction Program) would be implemented by the Project's tenants and *MM-TRA-2* (Construction of Sidewalk) would be implemented by the Project applicant to reduce the Project's VMT. Because the Project's VMT would not be reduced to below significance threshold even with the implementation of *MM-TRA-1* and *MM-TRA-2*, the Project's incremental contribution to VMT impact would be cumulatively considerable; therefore, the Project's contribution to VMT impacts would be a significant and unavoidable cumulative impact. **(Significant and Unavoidable Cumulative Impact)**

7.3 Project Alternatives Considered and Rejected

An EIR is required to identify any alternatives that were considered by the lead agency but were rejected as infeasible. Among the factors described by CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in an EIR are failure to meet most of the basic objectives of the project, infeasibility, or inability to avoid significant environmental impacts.

With respect to the feasibility of potential alternatives to a proposed project, CEQA Guidelines Section 15126.6(t)(l) states the following:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries … and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

In determining an appropriate range of Project alternatives to be evaluated in this EIR, a number of possible alternatives were initially considered and then rejected. Project alternatives were rejected because they could not accomplish the basic objectives of the Project, they would not have resulted in a reduction of significant adverse environmental impacts, or they were considered infeasible to construct or operate.

Alternative Land Uses

According to the City's General Plan, the City's industrial land is highly constrained and is being underutilized (City of Santee 2003). The purpose of the Light Industrial (IL) zone is to create employment-generating uses in an industrial park setting. The IL zone is intended to provide for service commercial, light industrial, light manufacturing, and industrial support uses, mainly conducted in enclosed buildings. Important goals of the development standards for this zone are to utilize industrial land, have accessibility to major transportation routes, and compatibility with the adjacent commercial, residential, and recreational uses. Permitted uses in the IL designation include manufacturing and assembly, electronics, research and development, and light warehousing uses. The minimum size for a Light Industrial project site is 20,000 square feet and building heights over 40'-0" require aCUP-.

The availability of a site comparable in size to that of the Project site is extremely rare within the City, so consideration was given to alternatives that involve a comprehensive change in the site's land use and zoning designations to take advantage of the availability of a singular, relatively large, site within the City. Land uses considered included residential, commercial/retail, and mixed-use types of industrial uses. As discussed within Section 3.2, Environmental Setting, the Project site is located within an established industrial area and is

surrounded on three sides by industrial and manufacturing uses. Given the proximity of other existing industrial uses in both the immediate and broader Project area, residential, commercial/retail, and mixed-use alternative land uses would likely not be compatible with the neighboring industrial operations around the Project site. Accordingly, the Project site would be an undesirable location for residential, commercial/retail, and mixed-use developments. More importantly, such uses would not meet all of the Project Objectives, which include establishing a jobs-producing and tax-generating commerce center land use near transportation corridors (Objective 1), developing a high-quality industrial building with light manufacturing and distribution facilities for related uses in Santee that are designed to meet contemporary industry standards (Objective 2), developing a light manufacturing and distribution building with loading in close proximity to SR-52 and SR-67 that can be used as part of the Southern California supply chain and goods movement network (Objective 3), creating a fiscally sound and employment-generating industrial building within an established industrial area (Objective 4), and concentrating non-residential uses in areas designated for industrial use which are near existing roadways, highways, and freeways (Objective 5).

An Industrial Outdoor Storage (IOS) yard was considered as an alternative industrial use. Under the IOS use, the Project site would be utilized to store contractor's equipment, truck trailer parking, and/or shipping containers in a paved, outdoor lot. The improvements would include a small office that is approximately 2,000 square feet. In this scenario, the size of the building, square footage of office space, and number of employees would be reduced. However, truck trips to and from the site would remain approximately the same because the quantity of stored materials would be equivalent to the Project. Noise impacts would be substantially higher because all business activities under this alternative would be conducted outdoors, whereas the Project would have activities within the buildings. Stormwater impacts would be equivalent to the Project scenario because a treatment system would be installed as part of the IOS use. However, the IOS alternative industrial use was rejected because it did not meet the Project Objectives, including establishing a jobs-producing and tax-generating commerce center land use near transportation corridors (Objective 1), developing a high-quality industrial building with light manufacturing and distribution facilities for related uses in Santee that are designed to meet contemporary industry standards (Objective 2), developing light manufacturing and distribution building with loading in close proximity to SR-52 and SR-67 that can be used as part of the Southern California supply chain and goods movement network (Objective 3), and creating a fiscally sound and employment-generating industrial building within an established industrial area (Objective 4).

A self-storage facility was also considered as an alternative use. Under a self-storage use, a series of one-story, metal buildings would be built along an interconnected series of access roads, while leaving the original concessions building, sign, and screens in place. The net square footage of potential self-storage facilities would be less than that proposed by the Project. Noise impacts would be similar to or less than the project. Stormwater impacts would be equivalent to the Project because a treatment system would be installed. With the exception of the paving, the existing drive-in theatre facilities would remain untouched. Accordingly, a self-storage use would result in a less than significant impact to historic resources. However, the self-storage use was also rejected because it did not meet the Project Objectives, including establishing a jobs-producing and tax-generating commerce center land use near transportation corridors (Objective 1), developing a high-quality industrial building with light manufacturing and distribution facilities for related uses in Santee that are designed to meet contemporary industry standards (Objective 2), developing light manufacturing and distribution building with loading in close proximity to SR-52 and SR-67 that can be used as part of the Southern California supply chain and goods movement network (Objective 3), and creating a fiscally sound and employment-generating industrial building within an established industrial area (Objective 4).

Alternate Sites

CEQA does not require that an analysis of alternate sites always be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternate site, then a project alternative should be considered and analyzed in the EIR. Pursuant to CEQA Guidelines Section 15126.6(f)(2), in making the decision to include or exclude analysis of an alternate site, the "key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR."

Development of the Project in an alternate location would generally have similar impacts as would occur with implementation of the Project at its proposed location, although impacts related to biological resources and historic resources would be reduced. The IL and General Industrial (IG)-designated land areas within the City of Santee are almost entirely developed and no similarly sized parcels are available for the Project.

Further, if the alternate site were to be located farther from major regional transportation routes (e.g., SR 67 and other local truck routes), operational impacts associated with traffic congestion, truck noise, and tailpipe air contaminant emissions would likely be greater than those associated with the Project and disclosed in this EIR, as the vehicles would need to travel farther on local roads to reach regional highway systems.

Moreover, according to the San Diego Association of Governments (SANDAG) Comprehensive Regional Goods Movement Plan and Implementation Strategy, the region will run out of suitably zoned vacant land designated for warehouse facilities in or around 2028. At that time, forecasts show that the demand for warehousing space will be more than 1 billion square feet. The Comprehensive Regional Goods Movement Plan and Implementation Strategy also states that unless other land not currently zoned for warehousing becomes available, the Southern California Association of Governments (SCAG) forecasts that by 2035, a projected shortfall of space of approximately 227 million square feet will occur (SCAG 2012). Thus, it is likely that selection of an alternate site would merely displace the development activity proposed by the Project to another location, resulting in the same or greater environmental effects (although impacts related to biological resources and historic resources would be reduced), given the regional demand for logistics and warehousing space in the SANDAG and SCAG region.

Additionally, Assembly Bill 98 (AB 98) was recently signed into law and includes several new requirements for warehouse project applications filed after September 30, 2024. AB 98 becomes effective on Jan. 1, 2026. If an alternative site location were to be considered, it would constitute a new project and would therefore be subject to the additional requirements and restrictions of this new law.

7.4 Project Alternatives Under Further Consideration

The following provides analysis of the No Project/No Development Alternative (Alternative 1) and the two build alternatives: the Reduced Development Intensity Alternative (Alternative 2) and the Refrigerated Warehouse Alternative (Alternative 3).

The evaluation below provides a relative comparison between the Project and each of the three Project alternatives. The analysis considers the issue areas evaluated in Chapter 4, Environment Analysis, and the cumulative analysis in Chapter 6, Other CEQA Considerations, of this EIR. In many cases, the Project and a Project alternative may share the same level of significance (i.e., both scenarios would result in a less-than-significant impact). However, although they might share the same level of significance under CEQA, the actual degree of impact may be slightly different

for each scenario, and this relative difference is the basis for a conclusion of greater or lesser impacts compared to the Project.

An environmentally superior alternative is identified among the alternatives evaluated in this EIR. An alternative would be environmentally superior to the Project if it would result in fewer or less significant environmental impacts while achieving most of the Project objectives.

7.4.1 No Project/No Development Alternative (Alternative 1)

Project Alternative 1

Under Alternative 1, construction of the Project would not occur, and the existing environment would remain in its current state. The Project site would remain unchanged, and development activities related to construction and operation of the proposed industrial/warehouse building, associated office spaces, surface parking and loading areas, and all other proposed on- and off-site improvements would not occur.

In the short term, consistent with the existing conditions, the Project site would continue to be underutilized. Under Alternative 1, the Project site would remain with a non-operating drive-in theatre that includes two movie screens, two ticket booths, and a building containing restrooms and a snack bar, which could be used as a swap meet on weekends. The site would presumably continue to be utilized for a swap meet on the weekends, and subject to vegetation occurring similar to the existing conditions. It is assumed any existing maintenance and/or security activity at the site would remain unchanged from existing conditions.

Comparative Analysis of Environmental Effects

The Project site would remain unchanged, on-site conditions would remain similar to existing conditions, and because development activities associated with the Project would not occur, nearly all environmental impacts would be reduced or avoided compared with Project conditions. Thus, there would be no potentially significant impacts related to biological resources; cultural, tribal cultural, and paleontological resources (project and cumulative); and transportation (project and cumulative).

Alternative 1 would not result in any ground disturbance that would potentially affect biological resources or unknown cultural, tribal cultural, or paleontological resources. As such, the less than significant impacts with mitigation incorporated that would potentially occur related to these resources under the development of the proposed Project would not occur under Alternative 1.

The significant and unavoidable impact with mitigation incorporated to historic resources (project and cumulative) that would occur with removal of the drive-in theatre by the Project would not occur under Alternative 1. In addition, the significant and unavoidable impact with mitigation incorporated related to vehicle miles travelled (VMT) (project and cumulative) that would occur related to transportation under the development of the proposed Project would not occur under Alternative 1.

Relationship to the Project Objectives

Alternative 1 would not meet any of the project objectives as it would not develop a jobs-producing and tax-generating commerce center land use near transportation corridors that is constructed to high standards of quality and provides diverse economic opportunities for those residing and wishing to invest within the City of Santee (Objective 1); a high-quality development for uses in Santee that are designed to meet contemporary industry

standards, can accommodate a wide variety of users, and are economically competitive with similar developments in the local area and region (Objective 2); a facility within the East County region of San Diego County and in close proximity to SR-52 and SR-67 that can be used as part of the Southern California supply chain and goods movement network (Objective 3); a fiscally sound and employment-generating project within an established industrial area (Objective 4); and/or result in a project that concentrates non-residential uses in areas designated for industrial uses which are near existing roadways, highways, and freeways in an effort to isolate and reduce any potential environmental impacts related to truck traffic congestion, air emissions, and industrial noise to the greatest extent feasible (Objective 5).

7.4.2 Reduced Development Intensity Alternative (Alternative 2)

Project Alternative 2

Under Alternative 2, the Project site would be redeveloped with a smaller warehouse building with the remainder of the Project site utilized for outdoor storage. Per Table 13.14.030A of the Santee Municipal Code, outdoor storage is allowable as an accessory use to a permitted use within the IL zone with the approval of a minor conditional use permit. Accessory outdoor storage uses must comply with Section 13.14.030(G)(2)) of the Santee Municipal Code which sets forth several requirements for screening, heights of stored material, locations of the stored material within the site, and access requirements. In addition, depending on the type of material to be stored, the installation of a canopy or outdoor roof structure may be required to shield the material from the elements to allow for the proper functioning of stormwater systems.

Under Alternative 2, the Project site would be redeveloped with an approximately 120,000 square feet (sf) warehouse-type building (an approximately 60% reduction in building size compared to the Project), an approximately 150,000 sf area dedicated to outdoor storage use, and reduced parking to accommodate the reduced development intensity. This alternative assumes compliance with Santee Zoning Code Section 13.14.030(G)(2) regarding outdoor storage. The reduced development footprint for Alternative 2 would be setback further south of the northern Project boundary and existing trees and a movie screen along the northern boundary of the Property would be retained in-place.

Comparative Analysis of Environmental Effects

Less than significant impacts of the proposed Project related to aesthetics, air quality, biological resources (with mitigation), energy, greenhouse gas emissions, hazards and hazardous materials, noise, public services, and wildfire would be *lesser* in magnitude under Alternative 2 overall because the development footprint would be smaller and farther from the northern boundary of the site. Relative to the Project, Alternative 2 would result in *similar* impacts related to hydrology and water quality, land use and planning, and utilities and service systems. Potentially significant impacts of the proposed Project related to biological resources and cultural, tribal cultural, and paleontological resources would be *lesser* in magnitude under Alternative 2 overall because the building and development footprint would be smaller, setback farther from the northern site boundary, and avoid the removal of the movie screen and trees along the northern site boundary. Potentially significant impacts related to transportation under Alternative 2 would be similar to the proposed Project as the reduction in building area and workers would not reduce the site's VMT.

The following analysis compares the Project's potentially significant environmental effects with those of Alternative 2.

Aesthetics

Alternative 2 would result in development of a smaller building that would reduce the scale and massing to approximately 40 percent compared to the proposed Project building. Alternative 2 would include approximately 150,000 sf of outdoor storage. The building under Alternative 2 would be 40 feet in height, consistent with the maximum allowable height specified by the Zoning Code for the IL zone. No CUP would be required to increase the building height. In addition, the building would be setback further from the northern Property boundary and would be obscured by existing trees; this would setback and obscure views of the development from trails and residences located north of the Project site. Similar to the Project, development of Alternative 2 would result in less than significant aesthetic impacts; however, development of Alternative 2 would further lessen aesthetic impacts to views from trails and residential areas located north of the Project site.

Air Quality

Alternative 2 would develop the site with a 120,000-sf warehouse building and an approximately 150,000-sf outdoor storage area. With a reduction in building area compared to the Project, construction-related emissions associated with development of Alternative 2 would be of lesser magnitude compared to the proposed Project. Alternative 2 would also generate fewer employees and vehicle trips per day due to the reduced development intensity compared to the Project. Similar to the Project, development of Alternative 2 would result in less than significant air quality impacts; however, development of Alternative 2 would further lessen construction- and operational-related air quality impacts because of the overall reduced development intensity.

Biological Resources

Similar to the Project, Alternative 2 would result in potential direct impacts to nesting birds and/or their habitat; indirect impacts to special-status wildlife species (specifically least Bell's vireo, yellow-breasted chat, and yellow warbler, as well as special-status plant species occurring within 500 feet of the Project site); indirect impacts to sensitive vegetation communities occurring adjacent to the Project site; indirect impacts to jurisdictional aquatic resources occurring within 500 feet of the Project site associated with the San Diego River; indirect impacts to the San Diego River corridor, which occurs adjacent to the Project site and may function as a local wildlife corridor; direct and indirect impacts to trees. However, **MM-BIO-1 through MM-BIO-4** could be implemented under Alternative 2 to reduce biological impacts to less than significant. Relative to the Project, all impacts to biological resources under Alternative 2 would be lesser in magnitude because fewer trees would be removed or indirectly impacted by the development and the setback of the development from the northern Property boundary would result in a larger buffer between biological resources near the San Diego River corridor. Therefore, potential impacts to biological resources would be lesser in magnitude under Alternative 2 overall.

Cultural, Tribal Cultural, and Paleontological Resources

Similar to the Project, Alternative 2 would result in ground disturbing construction activities onsite that could result in a potentially significant impact related to discovery of buried archaeological resources, previously unknown or undiscovered human remains, tribal cultural resources, and previously unknown or undiscovered paleontological resources. However, **MM-CUL-1** and **MM-CUL-2** could be implemented under Alternative 2 to reduce the potential impacts to less than significant. Implementation of Alternative 2 would also result in the loss of significant features of the Santee Drive-In Theatre site similar to the Project but would retain the movie screen near the northwest Property boundary to partially mitigate this impact. In addition, **MM-HIS-1 through MM-HIS-4** could be implemented under Alternative 2. Similar to the Project, the overall impact to historic resources would remain significant and

unavoidable with incorporation of **MM-HIS-1 through MM-HIS-4**; however, impacts to historic resources would be of lesser magnitude under Alternative 2 because the former Drive-In Theatre movie screen located along the northwest Property boundary would be retained.

Energy

Like the Project, Alternative 2 would require the use of various forms of energy during construction and operation. However, Alternative 2 includes a smaller building with outdoor storage, construction energy demand would be expected to be lesser than the Project. Alternative 2 would also generate fewer vehicle trips and would have less building space than the Project. Due to the reduced construction, building area, and number of employees, Alternative 2 would be expected to have a reduced energy demand when compared with the Project. Like the Project, Alternative 2 would have a less-than-significant impact related to energy, but Alternative 2 would have a lesser impact due to its reduced energy demand during construction and operation.

Greenhouse Gas Emissions

As discussed in Section 4.6, Greenhouse Gas Emissions, the Project would generate greenhouse gas (GHG) emissions during construction and operation, but these impacts would be less than significant. Alternative 2 would also generate GHG emissions, though a lower level of emissions would be expected under Alternative 2 because of the reduced building space and anticipated lower number of employees traveling to and from the site each day. Therefore, Alternative 2 would be expected to have a lesser impact than the Project with regard to GHG emissions.

Hazards and Hazardous Materials

Alternative 2 would result in development of a smaller building that would be setback further from the northern Property boundary along the San Diego River corridor. Similar to the Project, development of Alternative 2 would result in less than significant impacts related to hazards and hazardous materials; however, development of Alternative 2 would further lessen these impacts overall because Alternative 2 would have a smaller extent of site development and would be setback further from potential wildfire fuels north of the property boundary.

Hydrology and Water Quality

The proposed Project would include development of an on-site storm drain system that would accept flows from drain inlets at low spots throughout the site in compliance with the San Diego County BMP Design Manual and the City of Santee Guidelines for Surface Water Pollution Prevention Manual. Stormwater would continue to flow to the north of the site via an underground infiltration system located in the northern portion of the site. Under Alternative 2, the on-site storm drain system and infiltration system would be similar to the proposed Project and consistent with San Diego County LID requirements. Similar to the Project, development of Alternative 2 would result in less than significant impacts to hydrology and water quality; although development of Alternative 2 would result in a reduced extent of development, hydrology and water quality impacts would be similar overall because storm drain improvements throughout the site would still be required.

Land Use and Planning

As discussed in Section 4.9, Land Use and Planning, the Project would not divide an established community and would be consistent with the following plans: City of Santee General Plan and Zoning Code, SANDAG 2021 Regional Plan/Sustainable Communities Strategy (RP/SCS), SDAPCD regulations and requirements, and the San Diego

County Regional Transportation Congestion Improvement Program/Regional Arterial System (RTCIP/RAS). Alternative 2 is similar to the Project in that it would develop a warehouse consistent with local land use plans and policies. As described above, outdoor storage would be permitted within the IL zone with the approval of a conditional use permit. Like the Project, development of Alternative 2 would result in less than significant impacts related to land use and would be similar to the Project overall.

Noise

As discussed in Section 4.10, Noise, of this EIR, the analysis determined that the Project would not result in exceedances of local noise standards and concluded that the Project would result in less-than-significant construction- and operation-related noise impacts. Like the Project, Alternative 2 would include new sources of temporary construction and permanent operational noise, and would include a noise barrier. However, because Alternative 2 would develop a smaller building and development footprint and would be setback further from sensitive noise receptors north of the Project site, it is expected that construction and operational noise impacts would be of lesser magnitude compared to the Project.

Public Services

As discussed in Section 4.11, Public Services, of this EIR, the Project would result in less than significant impacts related to fire protection and police services and no impact related to parks, schools, and other public services because such services are generally based on population, not building size. While the Project would add new employees within the service areas of fire, law enforcement, parks, schools, and other public services, the increase would be nominal in light of existing population and employment numbers. In addition, required payment of development impact fees (DIFs) would ensure the Project contributes its fair share towards Santee Fire Department (SFD) facility improvements and equipment. Similar to the Project, development of Alternative 2 would result in less than significant impacts related to public services; however, development of Alternative 2 would further lessen these impacts overall because Alternative 2 would have a smaller extent of site development and would be anticipated to employ fewer workers compared to the Project.

Transportation

VMT is largely dependent on the specific land use type of a particular project and the location of that project. While a reduction in a Project's size could reduce the overall VMT associated with a given project, reducing a project's square footage would not necessarily have an effect on VMT per capita or employee, which are efficiency metrics. Thus, while the building under Alternative 2 would be reduced by approximately 60% compared to the Project, VMT per employee would essentially remain constant. In addition, because a reduction in Project size would correlate to a similar reduction in on-site workforce, the Project's VMT per employee would also stay relatively the same under Alternative 2 as the Project's VMT per employee. It should be noted that truck trips are not required to be included in the VMT estimation per SB 743 requirements. Therefore, transportation impacts with regard to VMT would be similar to the Project's impact under Alternative 2.

Utilities and Service Systems

Under Alternative 2, a reduced building area and development intensity overall would be onsite. The reduced intensity of development on the site would also be expected to require fewer workers compared to the Project. With a reduction in building area and the number of employees, Alternative 2 would be expected to have a lower water demand, wastewater generation, and solid waste generation than the Project. However, Alternative 2 would require the same on- and off-site improvements as needed for the Project. As such, the same wet and dry utilities would be

required, with construction and operational characteristics of these on- and offsite improvements being similar to the Project. Therefore, utilities and service systems impacts would be similar under Alternative 2.

Wildfire

As discussed in Section 4.14, Wildfire, of this EIR, the distance between a wildfire that is consuming wildland fuel and a building is the primary factor for structure ignition (not including burning embers) (Cohen 2000). Compared to the proposed Project, the building under Alternative 2 would be further set back from offsite wildland fuels located north of the Project site. Similar to the Project, development of Alternative 2 would result in less than significant wildfire impacts; however, the increased distance between the proposed building under Alternative 2 and wildland fuels north of the Project site would further lessen the potential for wildfire impacts.

Relationship to the Project Objectives

Alternative 2 would partially meet Objective 1 because it would result in development of new jobs and tax-generating business near transportation corridors but would not create a commerce center. Alternative 2 would not meet Objective 2 as it would not be able to accommodate a wide variety of users due to the limited building size and substantial outdoor storage area. Alternative 2 would meet Objective 3 as it would develop a facility in close proximity to SR-52 and SR-67 that can be used as part of the Southern California supply chain and goods movement network. Alternative 2 would mostly meet Objective 4, but not to the same extent as the Project because Alternative 2 would have limited flexibility, making it more difficult to develop a fiscally-sound use. Also, Alternative 2 would generate fewer new jobs that the Project, making Alternative 2 meet this portion of Objective 4 to a lesser degree than the Project. Finally, Alternative 2 would meet Objective 5 as it would develop a non-residential use in an industrial area. Given the reduced intensity of development under Alternative 2, this alternative would be expected to result in fewer truck trips, lesser air emissions, and less industrial noise than the Project. As such, Alternative 2 would meet most of the Project Objectives, but would fall short of meeting Objective 2.

7.4.3 Refrigerated Warehouse Alternative (Alternative 3)

Project Alternative 3

Under Alternative 3, the Project site would be redeveloped with a smaller warehouse-type building of approximately 200,000 sf and up to 40 feet in height. It is assumed that the warehouse would include 100,000 square feet for cold storage space, 95,000 square feet for general warehousing uses, and 5,000 square feet for office use. Compared to the proposed Project, the project footprint for Alternative 3 would be smaller and setback further south of the northern Project boundary. It is assumed that existing trees and movie screen along the northern boundary of the Property would be retained in-place. Per Table 13.14.030(A) of the Santee Municipal Code, cold storage would fall under the "Fruit or vegetable products manufacturing, including frozen foods" use and would be permitted within the IL zone with the approval of a conditional use permit. The reduced development would require fewer employees. Proposed parking at the site would require fewer parking stalls compared to the proposed Project and would be utilized for the staging and storage of refrigerated trailers, which would be connected to exterior electrical receptacles to keep their contents cold or temporarily operated under their own power via diesel generators. This alternative assumes compliance with all zoning and development regulations for the IL zoning.

Comparative Analysis of Environmental Effects

Less than significant impacts of the proposed Project related to air quality, energy, and greenhouse gas emissions would be *greater* in magnitude under Alternative 3 overall because the building would accommodate cold storage uses. Less than significant impacts of the proposed Project related to aesthetics, hazards and hazardous materials, noise, public services, and wildfire would be *lesser* in magnitude under Alternative 3 overall because the development footprint would be smaller and setback farther from the northern boundary of the site. Relative to the Project, Alternative 3 would result in *similar* impacts related to hydrology and water quality, land use and planning, and utilities and service systems, and unknown cultural, tribal cultural, and paleontological resources. The significant and unavoidable transportation impact (VMT generation) of the proposed Project would be similar in magnitude under Alternative 3 because the reduction in building area and workers would not reduce the site's VMT. The Project's potentially significant impact to biological resources would be lesser in magnitude under Alternative 3 because fewer trees would be removed or indirectly impacted by the development, and the setback of the development from the northern Property boundary would result in a larger buffer from biological resources in the San Diego River corridor. The Project's significant and unavoidable impact to historic resources of the proposed Project would be lesser in magnitude under Alternative 3 because the former Drive-In Theatre movie screen located along the northwest Property boundary would be retained.

The following analysis compares the Project's potentially significant environmental effects with those of Alternative 3.

Aesthetics

Alternative 3 would result in development of a smaller building that would reduce the scale and massing. In addition, the building would be setback further from the northern Property boundary and would be obscured by existing trees; this would setback and obscure views of the development from trails and residences located north of the Project site. Similar to the Project, development of Alternative 3 would result in less than significant aesthetic impacts; however, development of Alternative 3 would further lessen aesthetic impacts to views from trails and residential areas located north of the Project site.

Air Quality

Alternative 3 would result in development of a cold storage warehouse building that is 100,000 sf smaller than the proposed Project. Given the smaller development size, construction-related emissions associated with development of Alternative 3 would be of lesser magnitude compared to the proposed Project. Alternative 3 would also generate fewer vehicle trips per day due to the reduced building size. However, operational emissions of NOx and PM_{10} from the refrigeration component of Alternative 3 would be of greater magnitude compared to the Project. As such, operational air contaminant emissions under Alternative 3 would be of greater magnitude overall compared to the Project.

Biological Resources

Similar to the Project, Alternative 3 would result in potential direct impacts to nesting birds and/or their habitat; indirect impacts to special-status wildlife species (specifically least Bell's vireo, yellow-breasted chat, and yellow warbler, as well as special-status plant species occurring within 500 feet of the Project site); indirect impacts to sensitive vegetation communities occurring adjacent to the Project site; indirect impacts to jurisdictional aquatic resources occurring within 500 feet of the Project site associated with the San Diego River; indirect impacts to the San Diego River corridor, which occurs adjacent to the Project site and may function as a local wildlife corridor; direct and indirect impacts to trees. However, **MM-BIO-1 through MM-BIO-4** could be implemented under Alternative

3 to reduce biological impacts to less than significant. Relative to the Project, all impacts to biological resources under Alternative 3 would be lesser in magnitude because fewer trees would be removed or indirectly impacted by the reduced development and the setback of the development from the northern Property boundary would result in a larger buffer between biological resources near the San Diego River corridor. Therefore, potential impacts to biological resources would be lesser in magnitude under Alternative 3 overall.

Cultural, Tribal Cultural, and Paleontological Resources

Similar to the Project, Alternative 3 would result in ground disturbing construction activities onsite that could result in a potentially significant impact related to discovery of buried archaeological resources, previously unknown or undiscovered human remains, tribal cultural resources, and previously unknown or undiscovered paleontological resources. However, **MM-CUL-1** and **MM-CUL-2** could be implemented under Alternative 3 to reduce the potential impacts to less than significant. Implementation of Alternative 3 would also result in the loss of significant features of the Santee Drive-In Theatre site similar to the project but would retain the movie screen near the northwest Property boundary to partially mitigate this impact. In addition, **MM-HIS-1 through MM-HIS-4** could be implemented under Alternative 3. Similar to the Project, the overall impact to historic resources would remain significant and unavoidable with incorporation of **MM-HIS-1 through MM-HIS-4**; however, impacts to historic resources would be of lesser magnitude under Alternative 3 because the former Drive-In Theatre movie screen located along the northwest Property boundary would be retained.

Energy

The level of construction activities would be reduced under Alternative 3 compared to the Project. Thus, construction-related energy usage would be lessened. Alternative 3 would also generate fewer vehicle trips per day and would have less building space than the Project as proposed. Compared to the Project, energy consumption associated with long-term operations would be of greater magnitude under Alternative 3 because of the cold storage component. Similar to the Project, development of Alternative 3 would result in less than significant energy impacts; however, development of Alternative 3 would further lessen construction-related energy impacts, and a greater magnitude of long-term operational energy impacts would occur overall compared to the Project.

Greenhouse Gas Emissions

Similar to air quality, the extent of construction activities would be reduced under Alternative 3 compared to the Project. Thus, construction-related GHG emissions would be lessened. Alternative 3 would also generate fewer vehicle trips per day due to the reduction in the amount of building space. GHG emissions associated with long-term operation of Alternative 3 would be greater compared to the Project because of the cold storage component. As such, construction-related emissions under Alternative 3 would be of lesser magnitude; however, operation of Alternative 3 would result in a greater magnitude of GHG emissions overall compared to the Project.

Hazards and Hazardous Materials

Alternative 3 would result in development of a smaller building that would be setback further from the northern Property boundary along the San Diego River corridor. Similar to the Project, development of Alternative 3 would result in less than significant impacts related to hazards and hazardous materials; however, development of Alternative 3 would further lessen these impacts overall because Alternative 3 would have a smaller extent of site development and would be setback further from potential wildfire fuels north of the property boundary.

Hydrology and Water Quality

The proposed Project would include development of an on-site storm drain system that would accept flows from drain inlets at low spots throughout the site In compliance with the San Diego County BMP Design Manual and the City of Santee Guidelines for Surface Water Pollution Prevention manual. Stormwater would continue to flow to the north of the site via an underground infiltration system located in the northern portion of the site. Under Alternative 3, the on-site storm drain system and infiltration system would be similar to the proposed Project and consistent with San Diego County LID requirements. Similar to the Project, development of Alternative 3 would result in less than significant impacts to hydrology and water quality. Although development of Alternative 3 would result in a reduced extent of development, hydrology and water quality impacts would be similar overall because storm drain improvements throughout the site would still be required.

Land Use

As discussed in Section 4.9, Land Use and Planning, the Project would not divide an established community and would be consistent with the following plans: City of Santee General Plan and Zoning Code, SANDAG 2021 Regional Plan/Sustainable Communities Strategy (RP/SCS), SDAPCD regulations and requirements, and the San Diego County Regional Transportation Congestion Improvement Program/Regional Arterial System (RTCIP/RAS). Alternative 3 is similar to the Project in that it would develop a warehouse consistent with local land use plans and policies. As described above, cold storage would be permitted within the IL zone with the approval of a conditional use permit. Like the Project, development of Alternative 3 would result in less than significant impacts related to land use and would be similar to the Project overall.

Noise

As discussed in Section 4.10, Noise, of this EIR, the analysis determined that the Project would not result in exceedances of local noise standards and concluded that the Project would result in less-than-significant construction- and operation-related noise impacts. Like the Project, Alternative 3 would include new sources of temporary construction and permanent operational noise, and would include a noise barrier. However, because Alternative 3 would develop a smaller building and development footprint and would be setback further from sensitive noise receptors north of the Project site, it is expected that construction and operational noise impacts would be of lesser magnitude compared to the Project.

Public Services

As discussed in Section 4.11, Public Services, of this EIR, the Project would result in less than significant impacts related to fire protection and police services and no impact related to parks, schools, and other public services because such services are generally based on population, not building size. While the Project would add new employees within the service areas of fire, law enforcement, parks, schools, and other public services, the increase would be nominal in light of existing population and employment numbers. In addition, required payment of development impact fees (DIFs) would ensure the Project contributes its fair share towards Santee Fire Department (SFD) facility improvements and equipment. Similar to the Project, development of Alternative 3 would result in less than significant impacts related to public services; however, development of Alternative 3 would further lessen these impacts overall because Alternative 3 would have a smaller extent of site development and would be anticipated to employ fewer workers compared to the Project.

Transportation

VMT is largely dependent on the specific land use type of a particular project and the location of that project. While a reduction in a Project's size could reduce the overall VMT associated with a given project, reducing a project's square footage would not necessarily have an effect on VMT per capita or employee, which are efficiency metrics. Thus, while the building under Alternative 3 would be reduced by approximately 100,000 square feet compared to the Project, VMT per employee would essentially remain constant. In addition, because a reduction in Project size would correlate to a similar reduction in on-site workforce, the Project's VMT per employee would also stay relatively the same under Alternative 3 as the Project's VMT per employee. It should be noted that truck trips are not required to be included in the VMT estimation per SB 743 requirements. Therefore, transportation impacts with regard to VMT would be similar to the Project's impact under Alternative 3.

Utilities and Service Systems

Under Alternative 3, the Project would be constructed and operated as planned on the Project site, with the exception that the size of the proposed development would be reduced by 100,000 square feet and would include cold storage warehousing. All other on- and off-site improvements proposed as part of the Project are assumed to still be required under Alternative 3. As such, the same wet and dry utilities would be required, with construction and operational characteristics of these on- and offsite improvements being similar to the Project. Therefore, utilities and service systems impacts would be similar under Alternative 3.

Wildfire

As discussed in Section 4.14, Wildfire, of this EIR, the distance between a wildfire that is consuming wildland fuel and a building is the primary factor for structure ignition (not including burning embers) (Cohen 2000). Compared to the proposed Project, the building under Alternative 3 would be further set back from offsite wildland fuels located north of the Project site. Similar to the Project, development of Alternative 3 would result in less than significant wildfire impacts; however, the increased distance between the proposed building under Alternative 3 and wildland fuels north of the Project site would further lessen the potential for wildfire impacts.

Relationship to Project Objectives

Alternative 3 would meet Objectives 1, 3, 4, and 5, as it would develop a high-quality, jobs-producing, and tax-generating commerce center within an existing industrial area located near transportation corridors, including SR-52 and SR-67. Alternative 3 would not fully meet Objective 2 in that a reduced development at the site would result in a much less economically competitive development compared to similar developments in the local area and region. As such, Alternative 3 would meet most of the project objectives, but would fall short of meeting Objective 2.

7.5 Environmentally Superior Alternative

Section 15126(e)(2) of the State CEQA Guidelines requires an EIR to identify an "environmentally superior alternative." If the No Project/No Development Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other Project alternatives.

Table 7-1 compares the Project's potentially significant environmental effects with those of the alternatives considered above. Shown in italics, this table also includes three (3) resource areas identified as less than

significant under the Project (e.g., air quality, energy, greenhouse gas emissions) that could potentially result in an impact greater in magnitude compared to the Project under Alternatives 3.

Alternative 1 (No Project/No Development Alternative) would be the environmentally superior alternative because all of the significant impacts of the Project would be avoided and no environmental impacts would occur. However, Alternative 1 would not meet any of the Project's Objectives. Alternative 2 (Reduced Development Intensity Alternative) would result in the same potentially significant and unavoidable impacts as the Project, though impacts to biological resources and historic resources would be of a lesser magnitude compared to the Project. Thus, Alternative 2 would be identified as another Environmentally Superior Alternative to the Project. Compared to the Project, Alternative 3 (Refrigerated Warehouse Alternative) would result in similar impacts to hydrology and water quality, land use and planning, transportation, and utilities and service systems, and would result in greater impacts to air quality, energy, and greenhouse gas emissions. Alternative 2 and Alternative 3 would meet most of the project objectives, though not to the same extent as the Project, and would fall short of meeting Objective 2. Because Alternative 2 would result in reduced environmental impact to most resources compared to the Project and Alternative 3, Alternative 2 would be considered environmentally superior. This alternative could also meet most of the project's objectives. It should be noted that Alternative 2 would not avoid significant unavoidable impacts of the Project.

Table 7-1. Project Alternatives Environmental Impacts Comparison

Environmental Issue	Project	No Project/No Development Alternative (Alternative 1)	Reduced Development Intensity Alternative (Alternative 2)	Refrigerated Warehouse Alternative (Alternative 3)
Aesthetics	Less than Significant	Lesser	Lesser	Lesser
Air Quality	Less than Significant	Lesser	Lesser	*Greater*
Biological Resources	Less-than-Significant with Mitigation Incorporated	Lesser	Lesser	Lesser
Cultural, Tribal Cultural, and Paleontological Resources	Significant and Unavoidable	Lesser	Lesser	Lesser
Energy	Less than Significant	Lesser	Lesser	*Greater*
Greenhouse Gas Emissions	Less than Significant	Lesser	Lesser	*Greater*
Hazards and Hazardous Materials	Less than Significant	Lesser	Lesser	Lesser
Hydrology and Water Quality	Less than Significant	Lesser	Similar	Similar
Land Use and Planning	Less than Significant	Lesser	Similar	Similar
Noise	Less than Significant	Lesser	Lesser	Lesser
Public Services	Less than Significant	Lesser	Lesser	Lesser
Transportation and Traffic	Significant and Unavoidable with Mitigation Incorporated	Lesser	Similar	Similar

Table 7-1. Project Alternatives Environmental Impacts Comparison

Environmental Issue	Project	No Project/No Development Alternative (Alternative 1)	Reduced Development Intensity Alternative (Alternative 2)	Refrigerated Warehouse Alternative (Alternative 3)
Utilities and Service Systems	Less than Significant	Lesser	Similar	Similar
Wildfire	Less than Significant	Lesser	Lesser	Lesser

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None

Chapter 2: Introduction

None

Chapter 3: Project Description

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Chapter 8: List of Preparers

None

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