
Environmental Impact Report

Carlton Oaks Country Club and Resort Project

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Prepared for:

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
°C	degrees Celsius
°F	degrees Fahrenheit
AB	Assembly Bill
ABM	Activity-Based Model
ACM	asbestos containing materials
ADT	average daily trips
AERMOD	American Meteorological Society/Environmental Protection Agency Regulator Model
AFY	acre-feet per year
AGR	Agricultural Supply
AIA	Airport Influence Area
Alquist–Priolo Act	Alquist–Priolo Earthquake Fault Zoning Act
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AM	morning peak hour
AMSL	above mean sea level
AQIA	Air Quality Impact Analysis
Basin Plan	San Diego Region – The Basin Plan
BMP	best management practice
BP	years before present
BTU	British thermal unit
CA Title 22	California Code of Regulations, Title 22
CAA	federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
Cal/EPA	California Environmental Protection Agency
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
California Energy Code	California Energy Efficiency Standards for Residential and Nonresidential Buildings
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
Carl Moyer Program	Carl Moyer Memorial Air Quality Standards Attainment Program
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife

Acronym/Abbreviation	Definition
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CGP	Construction General Permit
CGS	California Geological Survey
CLOMR	Conditional Letter of Map Revision
cm	centimeter
CO	carbon monoxide
COLD	Cold Freshwater Habitat
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRMP	Cultural Resources Monitoring Plan
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CY	cubic yards
DEH	San Diego County Department of Health
DG	decomposed granite
DMA	drainage-management area
DOT	U.S. Department of Transportation
DPM	diesel particulate matter
DRP	Data Recovery Plan
DTSC	Department of Toxic Substances Control
DWR	California Department of Water Resources
ECAWP	East County Advanced Water Purification
EDR	Environmental Data Resources LLC
EIR	Environmental Impact Report
EMFAC	Emission Factors
EOC	Emergency Operations Center
ESA	Environmental Site Assessment
ESL	environmentally sensitive land
EV	electric vehicle
EVCS	electric vehicle charging station
EVSE	electric vehicle supply equipment
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulation
FEMA	Federal Emergency Management Agency
FHSZ	Fire-Hazard Safety Zone
FINDS	Facility Index System
FIRM	Flood Insurance Rate Map

Acronym/Abbreviation	Definition
FMZ	fuel-modification zone
FPP	Fire Protection Plan
FR	Federal Register
FRAP	Fire Resource Assessment Program
FTA	U.S. Department of Transportation Federal Transit Administration
Geocon	Geocon Incorporated
GHG	greenhouse gas
GVWR	gross vehicle weight rating
HA	Hydraulic Area
HC	hydrocarbon
HCD	State Department of Housing and Community Development
HIST UST	Historical UST Registered Database
HMD	San Diego County Hazardous Materials Division
HMP	Hydromodification Management Plan
HOA	Homeowner's Association
Hot Spots Act	Air Toxics Hot Spots Information and Assessment Act of 1987
hp	horsepower
HRA	Health Risk Assessment
HU	Hydrologic Unit
Hunsaker & Associates	Hunsaker & Associates San Diego Inc.
HVAC	heating, ventilation, and air conditioning
I-	Interstate
IBC	International Building Code
IFC	International Fire Code
IND	Industrial Service Supply
IRP 2015 Update	Integrated Resources Plan 2015 Update
JRMP	Jurisdictional Runoff Management Plan
LBP	lead-based paint
LED	light-emitting diode
LID	low-impact development
LOMR	Letter of Map Revision
LOP	Local Oversight Program
LOS	level of service
LRA	Local Responsibility Area
LUST	leaking underground storage tank
Master Plan	San Diego River Park Master Plan
MCAS	Marine Corps Air Station
Metro	City of San Diego's Metropolitan Wastewater System
mg/L	milligrams per liter
MHPA	Multi-Habitat Planning Area
MICR	maximum incremental cancer risk
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MMC	Mitigation Monitoring Coordinator

Acronym/Abbreviation	Definition
MMT CO ₂ e	million metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
MTS	Metropolitan Transit System
MUN	Municipal and Domestic Supply
MWD	Metropolitan Water District of Southern California
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NED	National Elevation Dataset
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NHTSA	National Highway Traffic Safety Administration
NIMS	National Incident Management System
NO	nitric oxide
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSR	New Source Review
O&M	operations and maintenance
OA	Operation Area
OA EOP	County of San Diego Operational Area Emergency Operations Plan
OCP	organochlorine pesticide
OEHHA	California Office of Environmental Health Hazard Assessment
OPR	California Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
P/OS	Park/Open Space
Park Master Plan	San Diego River Park Master Plan
PD	Planned Development
PDF	Project Design Feature
PDMWD	Padre Dam Municipal Water District
PDP	Priority Development Project
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of 10 micrometers or less
PM _{2.5}	particulate matter with an aerodynamic diameter of 2.5 micrometers or less
Porter–Cologne Act	Porter–Cologne Water Quality Control Act
ppm	parts per million

Acronym/Abbreviation	Definition
PRC	California Public Resources Code
project	Carlton Oaks Country Club and Resort Project
PUC	Public Utilities Commission
PV	photovoltaic
PVC	polyvinyl chloride
R14	Medium-High Density Residential
R2	Medium Density Residential
R-2	Low-Medium Density Residential
RAQS	San Diego Regional Air Quality Strategy
RARE	Rare, Threatened, or Endangered Species
RCRA	Resource Conservation and Recovery Act of 1976
REC1	Contact Water Recreation
REC2	Non-Contact Water Recreation
REL	reference exposure level
RES	Regional Energy Strategy
RGA	Recovered Government Archive
RHNA	Regional Housing Needs Assessment
ROG	reactive organic gas
ROW	right-of-way
RPS	Renewables Portfolio Standard
RS	Residential-Single Unit
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SAMP	Site Assessment and Mitigation Program
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCAB	South Coast Air Basin
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
SDCWA	San Diego County Water Authority
SDFD	City of San Diego Fire-Rescue Department
SDG&E	San Diego Gas and Electric
SDP	Standard Development Project
SDPD	City of San Diego Police Department
SDSD	San Diego Sheriff's Department
SEMS	Standardized Emergency Management System
SEP	State Energy Plan
SFD	Santee Fire Department
SFHA	Special Flood Hazard Area

Acronym/Abbreviation	Definition
SIP	State Implementation Plan
SLT	screening-level threshold
SMARA	Surface Mining and Reclamation Act
SO ₂	sulfur dioxide
SPCC	Spill Prevention, Control, and Countermeasure
SR-	State Route
SRA	State Responsibility Area
SSP	Sustainable Santee Plan
State Forest Board	California State Board of Forestry
STP	shovel test-pit
SWEEPS	Statewide Environmental Evaluation and Planning System
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	total air contaminant
Tanner Act	Toxic Air Contaminant Identification and Control Act
TDM	Transportation Demand Management
TDS	total dissolved solid
Technical Advisory	Technical Advisory on Evaluation Transportation Impacts on CEQA
TEU	twenty-foot equivalent unit
TIS	Transportation Impact Study
TMDL	Total Maximum Daily Load
TSM	Transportation System Management
U.S.C.	United States Code
USCG	U.S. Coast Guard
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
Value Standard	Recreational Value-Based Park Standard
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WARM	Warm Freshwater Habitat
WILD	Wildlife Habitat
WMA	Watershed Management Area
WQIP	Water Quality Improvement Plan
WRF	wastewater-recycling facility
WUI	wildland/urban interface

ES Executive Summary

ES.1 Introduction

This Executive Summary provides an overview of the Draft Environmental Impact Report (EIR) prepared for the proposed Carlton Oaks Country Club and Resort Project (project), prepared in compliance with the California Environmental Quality Act (CEQA). The City of Santee is the CEQA lead agency for the EIR and, as such, has the primary responsibility for evaluating the environmental effects of the proposed project and considering whether to approve or disapprove the proposed project in light of these effects. The City of San Diego is a responsible agency, as defined under State CEQA Guidelines Section 15381, because a portion of the project site is within the City of San Diego's jurisdiction, and the City of San Diego is responsible for approving the applicable discretionary permits.

As required by CEQA, this Draft EIR does the following: (1) describes the proposed project, including its location, objectives, and features; (2) describes the existing conditions at the project site and nearby environs; (3) analyzes the direct, indirect, and cumulative adverse physical effects that would occur on the existing conditions should the proposed project be implemented; (4) identifies feasible means of avoiding or substantially lessening the significant adverse effects; (5) provides a determination of significance for each impact after mitigation is incorporated; and (6) evaluates a reasonable range of feasible alternatives to the proposed project that would meet the basic project objectives and reduce a project-related significant impact.

This Executive Summary covers the following topics: (1) project description; (2) areas of controversy/issues raised by agencies and the public; and (3) issues to be resolved, including significant environmental effects and consideration of alternatives to the proposed project.

ES.2 Project Description

ES.2.1 Overview

Carlton Oaks Golf Course ownership and Lennar Homes, as joint project proponents, are proposing to redevelop the existing 1950s-era Carlton Oaks Country Club facility into a modern destination resort with residential accessory uses (i.e., the proposed project). The project site is located on approximately 165 acres, and the project would include the following components: (1) demolition of the existing Carlton Oaks Golf Course; (2) redesign of the golf course; (3) reconstruction of the clubhouse with a new pro shop, practice area, and learning center structure; (4) construction of a hotel and associated cottages; (5) construction of residential accessory uses consisting of two residential neighborhoods with open space areas; and (6) construction of related on-site infrastructure. The proposed project would include demolition of the existing Carlton Oaks Golf Course clubhouse, restaurant/bar, pro shop, hotel and hotel cottages, and surface parking lots.

Approximately 3.5 acres consist of areas outside of the project site that would be developed with improvements associated with the project and are located either in the City of San Diego or City of Santee (off-site improvement areas). The off-site improvement areas and the project site make up the CEQA Study Area.

ES.2.2 Project Location

The project site is approximately 165 acres spanning the City of Santee and City of San Diego. Approximately 3.5 acres outside of the project site would be developed with improvements associated with the project. These areas are located in either the City of San Diego or the City of Santee (off-site improvement areas). The off-site improvement areas and the proposed project site make up the CEQA Study Area, with a total of approximately 169 acres. The project site is north of State Route (SR-) 52, where it travels in an east–west direction, south of single-family and multifamily residential development lining Carlton Oaks Drive, east of West Hills Parkway and SR-52 (where it traverses in a northwest–southeast direction), and adjacent to the San Diego River Trail.

Approximately 100.6 acres of the project site occurs in the City of Santee, and approximately 64.2 acres occurs in the City of San Diego (East Elliot Community). Project components, including the proposed clubhouse, hotel, residential development, and the majority of the golf course, would be within the City of Santee. Project components within the City of San Diego would include a portion of the redesigned golf course (64.05 acres), driveway access to the proposed Residential West development from West Hills Parkway, widening and restriping of West Hills Parkway to provide access to the proposed residential neighborhood, a landscape easement (approximately 0.4 acres) along the widened portion of West Hills Parkway, and a portion of a graded bench (for future trail use) as well as a new Project Trail Segment in the southwestern portion of the site.

ES.2.3 Project Objectives

State CEQA Guidelines Section 15124(b) requires project descriptions to contain a statement of objectives that includes the underlying purpose of the proposed project. The objectives of the proposed project are identified below:

1. Provide a high-quality, mixed-use recreational resort that will enhance the experience of its users by integrating the country club and related amenities with the golf course and open-space areas to provide a resort-like setting for the facilities and offer views of the golf course from the facilities.
2. Develop a mixed-use, recreation-related country club resort consistently with the principles of the City of Santee *General Plan* (1984) that offers a high-quality resort setting and recreation-related amenities and uses that are consistent with other high-quality resorts in the region.
3. Provide a golf course with a professionally designed layout that can be used by a broad range of players, enhance the golfers' experiences, and meet the needs of the broader tourism market.
4. Provide a golf course that has improved drainage flows, reduced accumulation of surface water on the site, requires less water usage, and avoids environmentally sensitive areas, when feasible.
5. Provide additional economic revenue for the City of Santee and County of San Diego through the generation of sales, transient occupancy, and property taxes by expanding the event facilities, adding residential units, and upgrading the hotel units.
6. Invigorate the local economy by providing additional employment and business opportunities associated with operation of the proposed project.
7. Provide high-quality housing opportunities that help satisfy regional housing needs.
8. Locate the residential uses in a manner that will serve as a transition from the adjacent residential neighborhoods by providing comparable housing products.

9. Foster future economic sustainability of the Carlton Oaks Country Club and Resort by providing residential accessory uses that will result in a diversification of its customers and enhance membership opportunities to activate the facilities and the site year-round.
10. Design a development that is compatible with the San Diego River and includes links to existing and planned trails to the east and west of the project site.
11. Provide a mixed-use recreational facility that will provide similar lifestyle experiences (i.e., residential units) as other high-quality resorts in the region.

ES.3 Areas of Known Controversy/Issues Raised by Agencies and the Public

State CEQA Guidelines Section 15123 requires the summary of an EIR to include areas of controversy known to the lead agency, including issues raised by agencies and the public. The City of Santee circulated a Notice of Preparation (NOP) on June 7 through July 8, 2024, to solicit agency and public comments about the scope and content of the environmental analysis.

A total of 50 comment letters were received during the NOP public review period. The primary issues raised related to aesthetics and visual resources, air quality, biological resources, cultural resources, hydrology and water quality, land use, noise, recreation, transportation, wildfire, and alternatives. A summary of all comments received is included in Table 1-2 of Chapter 1, Introduction, and the NOP and all NOP comment letters are included as Appendix A of this EIR.

ES.4 Issues to Be Resolved

ES.4.1 Summary of Project Impacts

This Draft EIR examines the potential environmental effects of the proposed project, including information related to existing site conditions, analyses of the types and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts. In accordance with Appendix G of the State CEQA Guidelines, the potential environmental effects of the proposed project were analyzed for the following issue areas:

- | | |
|--|----------------------------------|
| ▪ Aesthetics and Visual Resources | ▪ Land Use and Planning |
| ▪ Air Quality and Health Risks | ▪ Mineral Resources |
| ▪ Biological Resources | ▪ Noise and Vibration |
| ▪ Cultural and Tribal Cultural Resources | ▪ Population and Housing |
| ▪ Energy | ▪ Public Services |
| ▪ Geology and Soils | ▪ Recreation |
| ▪ Greenhouse Gas Emissions | ▪ Transportation and Circulation |
| ▪ Hazards and Hazardous Materials | ▪ Utilities and Service Systems |
| ▪ Hydrology and Water Quality | ▪ Wildfire |

Table ES-1 provides a summary of the project design features (PDFs) that would be included in the proposed project design to help avoid impacts. Table ES-2 provides a summary of the environmental impacts that could result from

implementation of the proposed project and feasible mitigation measures that would reduce or avoid the impacts. For each impact, Table ES-2 identifies the significance of the impact before mitigation, applicable mitigation measures, and the level of significance of the impact after the implementation of the mitigation measures. Impacts on agricultural and forestry resources and mineral resources (Threshold 2) are considered to be “Effects Found Not to Be Significant,” in accordance with State CEQA Guidelines Section 15128. These issues are discussed further in Chapter 4, Other CEQA Considerations.

ES.4.2 Summary of Project Alternatives

The following alternatives are analyzed in detail in Chapter 5, Alternatives to the Proposed Project. The objective of the alternatives analysis is to consider a reasonable range of potentially feasible alternatives to foster informed decision-making and public participation. The alternatives to the proposed project are summarized below.

ES.4.2.1 Alternative 1 – No Project Alternative

No Project Alternative is required by CEQA to discuss and analyze potential impacts that would occur if the project were not implemented. Under the No Project Alternative, the site would continue to operate in its current state as the Carlton Oaks Golf Course, and the existing country club facility will continue to operate on PA-2. The golf course redevelopment, the construction of the Country Club and Resort, and the residential planning areas would not be implemented. The demolition of the existing Carlton Oaks golf course clubhouse, restaurant/bar, pro shop, hotel and hotel cottages, and surface parking lots (to allow for development of Residential North) would not occur. Ancillary improvements, such as the trail segments, access improvements, and off-site infrastructure improvements, would also not be constructed under this alternative. In other words, the no-project alternative would be the continuation of the existing operations.

ES.4.2.2 Alternative 2 – Reduced Project Alternative

Alternative 2 is referred to as the *Reduced Project Alternative* because of the overall reduced intensity resulting from a reduction in residential units and the elimination of the new resort facilities from the resort planning area (PA-3). Alternative 2 proposes fewer residential units overall and would not develop new resort facilities, thereby reducing the development footprint; as such, it would also incorporate components of the suggested alternatives provided by the Wildlife Agencies that incrementally avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife-movement areas. As discussed in greater detail within Section 5.5.2, Analysis of Alternative 2 – Reduced Project Alternative, this alternative was designed to reduce the development footprint and avoid or minimize impacts from potentially occurring at the Residential West site and resort sites. The Wildlife Agencies also requested the following:

- An “alternative that does not involve grade changes within the floodplain or floodway, or changes to the channels, and which do not require armoring or other stabilization techniques, which further impact stream functions.”

Alternative 2 and Alternative 3 meet this criterion.

- An “alternative that avoids impacts to stream, wetland, and riparian areas.”

The project itself already substantially avoids direct permanent impacts to the San Diego River and associated riparian areas. Alternative 2 would eliminate the proposed development at Residential West and the resort area

and also would not implement the golf course redesign. This would eliminate the small amount of wetland/riparian impacts associated with the western portion of Residential North and would also eliminate the temporary impacts along Sycamore Canyon Creek. Alternative 2 fits these requirements.

- An “alternative that does not reduce the width of the wildlife movement corridor.”

The wildlife movement corridor is more restricted along Sycamore Canyon Creek in the western portion of the project site (the location of Residential West). Residential North affects this restriction very minimally. Therefore, Alternative 2 (which eliminates Residential West) addresses the concerns of this comment.

- An “alternative that includes a design which consolidates development to the north side of the project site.”

Alternative 2 addresses this comment by consolidating development on the northern side and eliminating the development to the west. Alternative 2 also eliminates the resort area, as well as the golf course redesign.

Specifically, under this alternative, no residential units would be constructed at Residential West. The project’s proposed resort facilities would not be built within PA-3, and the golf course would remain as is (i.e., no construction or disturbance at PA-3). The acres available for new residential construction at Residential North would be reduced to 8 acres due to the need to retain the existing country club facilities. The existing country club facilities remain essentially the same because the Residential North parcel is not large enough to reasonably accommodate all of the project’s residential units and the resort facilities. It is anticipated that up to 72 units could be constructed within the 8-acre footprint, resulting in an overall net decrease of 170 units. The residential units would be the same multifamily detached product type (9 dwelling units per acre [DU/acre]) as for the proposed project. Amenities at Residential North would include a play structure with resilient surfacing, picnic tables covered by a shade structure, a dog run area, an outdoor pool, pool house, dining tables, chaise lounge chairs, and outdoor showers. The residential uses would still be an accessory to the primary recreational use (golf course). Residents would be able to access recreational and commercial uses at the existing country club and golf course because of its proximity to the Country Club facility and the entrance to the golf course. This will result in a diversification of its customers and enhance membership opportunities to activate the facilities and the site year-round. The following design assumptions for this alternative are summarized as follows:

- Density would be 0 DU/acre at Residential West.
- The project’s proposed resort facilities, including the golf course, would not be built (i.e., there would be no construction or disturbance at the proposed resort area).
- Density at Residential North would be 72 units (9 DU/acre) with an overall net decrease in residential density of 170 units.
- The West Hills Parkway trail bench/connection would not be required.
- The eastern emergency vehicle access (EVA) connection via Vista del Verde, and associated reconstruction of bridge between Residential North and the eastern EVA, would likely not be possible because the roadway and bridge would not be built through PA-3 due to the size of the development (fewer than 100 units).
- The extension of the Padre Dam Municipal Water District (PDMWD) Public Water Main and the widening of West Hills Parkway would not be required, as no development would occur within Residential West.
- The private utility maintenance road between Residential West and Residential North would not be required.
- The southeastern Project Trail Segment/connection would change alignment, starting instead at the segment of the planned SANDAG trail located at the boundary of Santee and City of San Diego and traveling

north, ending at the property line with Vista del Verde. A sewer lift station would still need to be placed within Residential North.

ES.4.2.3 Alternative 3 – Reduced Resort Alternative

Alternative 3, the Reduced Resort Alternative, is another variation of a reduced project alternative and, like Alternative 2, incorporates components of the suggested alternatives provided by the Wildlife Agencies that incrementally avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife-movement areas. In addition to the Wildlife Agency-requested features and components discussed for Alternative 2, there was also a request for an “Alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, or water-dependent ecosystems and natural communities.” Alternative 3 fits the parameters of what is being requested by this comment by eliminating all development at Residential North and the Resort area. This alternative would also not be able to implement the golf course redesign, which means that there would be no development or grading within the vicinity of any existing streams or watercourses.

Specifically, under this alternative, the new Country Club and Resort facilities, including the golf course, would be eliminated from PA-3 (i.e., no construction or disturbance at the proposed resort area). The project would maximize the housing concentration at Residential West by transferring all the residential units from Residential North to Residential West, increasing the density at Residential West to the 22–30 DU/acre range. The residential units would consist of multifamily attached homes. A playground, picnic tables, shade structure, and an overlook area with bench seating would be located along the southwestern boundary of Residential West, and a dog run area with artificial turf and shade trees would be located in the eastern portion of Residential West. The residential uses would still be an accessory to the primary recreational use (golf course). Residents would be able to access recreational and commercial uses at the existing country club and golf course, which will result in a diversification of its customers and enhance membership opportunities to activate the facilities and the site year-round. The private utility maintenance road between Residential West and Residential North would still be built, providing residents with the ability to access recreational and commercial uses at the existing country club and golf course. The roadway will provide an interconnected system of golf cart paths, a multi-use path, and sidewalks that encourage pedestrian and bicycle access to these facilities. Other design assumptions for this alternative include the following:

- The residential density at Residential North would be 0 DU/acre.
- 156 residential units would be added to the 8.7-acre Residential West planning area (PA-1), for a total of 242 units (27.82 DU/acre).
- The project’s proposed resort facilities would not be built within PA-3 (the resort area).
- Pursuant to the Wildlife Agency’s request to include an alternative which avoids impacts onto existing surface flows, watercourses, water-dependent ecosystems, and natural communities, this alternative would not include the golf course redesign.
- The existing resort and hotel would remain in its existing condition.
- The private utility maintenance road between Residential West and Residential North would be required due to requirements to provide the sewer force main.
- The West Hills Parkway trail bench/connection and widening/roadway improvements on West Hills Parkway would still be required.

- The southeastern Project Trail Segment/connection would change alignment, starting instead at the segment of the planned SANDAG trail located at the boundary of Santee and City of San Diego and travel north ending at the property line with Vista del Verde.
- The eastern EVA connection via Vista del Verde, and associated reconstruction of bridge between Residential North and eastern EVA, would not be possible because PA-3 would not be implemented.
- The sewer lift station would remain in its proposed location within Residential West.
- The extension of the PDMWD Public Water Main would not be required.
- There would be 8.7 acres of usable space for residential (0.3 acres deducted for sewer station).

As discussed in greater detail within Section 5.5.3, Analysis of Alternative 3 – Reduced Resort Alternative, this alternative would contrast with Alternative 2 because it was designed to avoid impacts with the potential to occur on the eastern portion of the project site, at Residential North and the Country Club and Resort.

ES.4.2.4 Alternative 4 – Reduced Footprint Project Alternative

Alternative 4 is referred to as the *Reduced Footprint Project Alternative* because of the overall reduction of the project's development footprint resulting from a reduction in the resort facilities in PA-3, the reduced intensity of development on the Residential North site, and the consolidation of the remaining residential units on the Residential West parcel, which has fewer environmental constraints. Specifically, under this alternative, the acres available for new residential construction at Residential North would be reduced to 16 acres to reduce the overall footprint of the project. It is anticipated that up to 135 units could be constructed within the 16-acre footprint, resulting in an overall net decrease of 21 units and a decrease in the overall footprint of 2.3 acres. The residential units would be the same multifamily detached product type (8 DU/acre) as for the proposed project. To make up for the 21 units lost at Residential North, the density at Residential West would be increased slightly in order to accommodate a total of 107 units on the 9.5-acre footprint. With a density of 11 DU/acre, the multifamily detached product type would not be feasible and would require switching the proposed units at Residential West to a clustered product type. The residential uses would still be an accessory to the primary recreational use (golf course). Residents would be able to access recreational and commercial uses, which will result in a diversification of its customers and enhance membership opportunities to activate the facilities and the site year-round. The private utility maintenance road between Residential West and Residential North would still be built, providing residents with the ability to access recreational and commercial uses at the country club and golf course. The roadway will provide an interconnected system of golf cart paths, a multi-use path, and sidewalks that encourage pedestrian and bicycle access to these facilities. The following design assumptions for this alternative are summarized as follows:

- Density at Residential North would be 135 units (8 DU/acre) on an approximately 16-acre footprint which has been reduced to avoid all biological resources impacts.
- To make up for the reduced density at Residential North, the unit count at Residential West would be increased to 107 units (11 DU/acre), and the product type would switch to a multifamily clustered product that have shared driveways and small yards.
- The footprint of PA-3 would be similarly reduced in order to reduce impacts on biological resources. Specifically, the footprint would be reduced by 0.22 acres (to 6.5 acres) in order to avoid impacts on Mule Fat Scrub – Disturbed, Nonnative Riparian, and Southern Cottonwood–Willow Riparian Forest – Disturbed. This alternative assumes that the reduced footprint would still be able to accommodate the clubhouse and restaurant; however, the hotel component would not be included in this alternative.

- The golf course would still be redesigned but to a lesser extent. This would necessarily result in some impacts on biological resources (approximately 0.48 acres); however, the redesign would be necessary because even with the reduced footprint of the Resort Area, the resort would need to eliminate portions of four of the existing holes.
- The West Hills Parkway trail bench/connection and widening/roadway improvements on West Hills Parkway would still be required.
- The eastern EVA connection via Vista del Verde, and associated reconstruction of bridge between Residential North and eastern EVA, would be constructed for secondary access.
- The sewer lift station would remain in its proposed location within Residential West.
- The extension of the PDMWD Public Water Main would be required.

As discussed in greater detail within Section 5.5.4, Analysis of Alternative 4 – Reduced Footprint Project Alternative, this alternative would contrast with Alternatives 2 and 3 because it would still develop all three planning areas, albeit on reduced footprints, and would still carry out a reduced version of the golf course redesign.

ES.4.2.5 Environmentally Superior Alternative

Pursuant to CEQA, an EIR is required to identify the environmentally superior alternative. Although the No Project Alternative (Alternative 1) reduces the greatest number of significant impacts, CEQA requires that when the environmentally superior alternative is the No Project Alternative, another alternative should be identified. Although all of the alternatives would reduce at least one impact compared to the proposed project, Alternative 2 would reduce impacts to a greater extent than the other alternatives for the issues of air quality and health risk, cultural and tribal cultural resources, energy, population and housing, public services, recreation, utilities, and wildfire. These reduced impacts would occur because Alternative 2 would develop just 72 units total, instead of 242 units, would not develop Residential West; would not develop the resort; and would not require the private utility maintenance road between Residential West and Residential North. Additionally, Alternative 2 would not require the extension of the PDMWD public water main or the widening of West Hills Parkway, nor would it require the construction of the West Hills Parkway trail bench/connection or the eastern EVA connection via Vista del Verde. As such, Alternative 2 would be the environmentally superior alternative.

Table ES-1. Summary of Project Design Features

Project Design Feature	Summary Description of Feature
Sustainability Features	
PDF-1	California Energy Code. The project will comply with California Title 24, Part 6 Energy Code (2022, or most recent in effect at the time of building permit application). The following energy-efficient items will be required in all residential units: improved heating, ventilation, and air-conditioning systems with sealed (tight) air ducts; enhanced ceiling, attic, and wall insulation; installed energy-conserving appliances, such as whole-house fans; high-efficiency water heaters (i.e., tankless water heaters); energy efficient three-coat stucco exteriors; energy efficient appliances; programmable thermostat timers; and high-efficiency window glazing.
PDF-2	CALGreen Code. As a matter of regulatory compliance, the project will comply with Section 5.106.5.2 of the California Green Building Standards Code (i.e., CALGreen Code) (2022, or most recent in effect at the time of building permit application). The project will provide designated parking for shared vehicles and clean air vehicles at the resort facility and at the project's parks. The project will also implement the latest CALGreen Code standards when building permits are requested.
PDF-3	Electric-Only Uses. All uses on site, with the exception of the restaurant, will be "all electric." Natural gas will only be installed for the restaurant's use.
PDF-4	Energy Star Appliances. Energy Star-rated appliances will be installed in all residences, and Energy Star-rated appliances, such as refrigerators, will be installed at the hotel and restaurant.
PDF-5	Low-Flow Water Appliances. Low-flow toilets, faucets, and shower heads will be installed throughout the entire project.
PDF-6	Recyclables and Yard Waste. Areas for storage and collection of recyclables and yard waste will be provided.
PDF-7	Residential Electric Vehicle Charging. Every residential dwelling unit garage (242 units) will have Level 2 electric vehicle equipment installed.
PDF-8	Non-Residential Electric Vehicle Charging. Forty-five percent of all non-residential parking spaces will be electric vehicle capable (132 spaces), and 33% of these electric-vehicle-capable parking spaces will have electric vehicle charging stations installed (44 units). [EV capable means that dedicated electrical-panel capacity and raceway infrastructure will be provided to support a future 40-ampere, 208/240-volt branch circuit for future, dedicated Level 2 electric vehicle equipment.]
PDF-9	Tree Planting. Approximately 645 new trees will be planted within the development: 414 new trees in the residential development, 60 new trees on the golf course, and 171 new trees at the hotel site and access road.
PDF-10	On-Site Solar Energy Generation. At least 1,168 kilowatts (kW) of solar energy generation will be installed on site (i.e., 1,089 kW on the residential units and 79 kW on the new resort). This exceeds the Sustainable Santee Plan (SSP) requirements. Under the SSP the project will be required to install 1 kW per unit for each multifamily unit, 2 kW per unit for each single-family unit, and 1.5 kW per square foot for commercial buildings. Under the SSP, 236 kW will be required for the multifamily development, 12 kW will be required for the single-family housing units, and roughly 78 kW will be required for the 51,926 square feet of commercial facilities. Given this, the SSP calls for at least 326 kW in total.

Table ES-1. Summary of Project Design Features

Project Design Feature	Summary Description of Feature
Fire Protection Features	
PDF-11	<p>Fire Protection Measures. The project proponent will implement the following fire protection measures:</p> <ul style="list-style-type: none"> ▪ Ignition-Resistant, Planned, and Maintained Landscape: All site landscaping of common areas and fuel-modification zones (FMZs) will be subject to strict plant types that are lower-ignition plants, with landscaping closest to structures requiring irrigation to maintain high plant moisture, which equates to difficult ignition. FMZs will be a minimum of 100 feet from the structure outward, which will reduce the risk of an ignition spreading from the project site to adjacent land uses, and also the spread of fire toward on-site structures. Roadside FMZs will extend 50 feet from the roadside on both sides, which will reduce the risk of ignition related to vehicles traveling within the project site, and also provide fire buffered corridors to support safer evacuations. Additionally, twice-annual inspections of FMZs and ongoing maintenance will be implemented to ensure long-term effectiveness of FMZs. Further, the project will benefit from the golf course, which includes irrigated and maintained, low-fuel, highly ignition-resistant landscaping and open water, and functions as a large fuel break. ▪ FMZ Around Perimeter of Project: A 100-foot-wide FMZ will be required from each structure outward toward open space areas and will include specifically selected plant species, very low fuel densities (i.e., 30%–50% retention of native plants in outer zones and irrigated inner zones), and ongoing Homeowner’s Association (HOA)-funded and -applied maintenance, resulting in a wide buffer between the developed areas and off-site native fuels. All project roads and the steel bridge at the abutments will also include, at minimum, a 50-foot FMZ. The roadside FMZs will have plant restrictions and maintenance requirements, as detailed in the project’s Fire Protection Plan. Roadside FMZs associated with the steel bridge will be the responsibility of the golf course operator. The golf course operator, as part of maintenance of the golf course, will be responsible for proper brush management, and defensible space will be cleared underneath the bridge and extending outward from the bridge. ▪ Twice-Annual FMZ Inspections: The HOA for the residential areas and the owner/property management agency of the resort will have a contracted, third-party, City of Santee Fire Department (SFD)-approved FMZ inspector perform two inspections per year to ensure that FMZs are maintained in a condition that is consistent with the City of Santee’s and the Fire Protection Plan’s requirements. ▪ Ignition-Resistant Structures: All structures will be built to the ignition-resistant requirements found in California Building Code Chapter 7A that have been developed and codified as a direct result of post-fire save-and-loss assessments. These measures will result in homes that are designed, built, and maintained to withstand fires and embers associated with wildfires. Ignition-resistant structure design features will include the following: <ul style="list-style-type: none"> - Exterior walls of all structures and garages will be constructed with approved, noncombustible (e.g., stucco, masonry, approved cement fiber board) or ignition-resistant material from grade to the underside of the roof system. Wood-shingle and shake wall coverings are prohibited. Any unenclosed under-floor areas will have the same protection as exterior walls. Per City of Santee Building Code Chapter 7A, exterior wall coverings will extend from the top of the foundation to the underside of the roof sheathing, and terminate at 2-inch nominal solid-wood blocking between rafters at all roof overhangs, or in the case of

Table ES-1. Summary of Project Design Features

Project Design Feature	Summary Description of Feature
	<p>enclosed eaves, terminate at the enclosure. The underside of any cantilevered or overhanging appendages and floor projections will maintain the ignition-resistant integrity of exterior walls, or projection will be enclosed to grade.</p> <ul style="list-style-type: none"> - Eaves and soffits will meet the requirements of Surface Feet per Minute (SFM) 12-7A-3 or be protected by ignition-resistant materials or noncombustible construction on the exposed underside, per the City of Santee Building Code. - There will be no use of paper-faced insulation or combustible installation in attics or other ventilated areas. - There will be no use of plastic, vinyl (with the exception of vinyl windows with metal reinforcement and welded corners), or light wood on the exterior. - All roofs will be a Class A-listed and fire-rated roof assembly, installed per the manufacturer's instructions, to the approval of the City of Santee. Roofs will be made tight, with no gaps or openings on ends, in valleys, or elsewhere between the roof covering and decking to prevent intrusion of flames and embers. Any openings on the ends of roof tiles will be enclosed to prevent intrusion of burning debris. When provided, roof valley flashings will not be less than 0.019 inches (No. 26 gage galvanized sheet) corrosion-resistant metal installed over a minimum 36-inch-wide underlayment consisting of one layer of 72-pound American Society for Testing and Materials (ASTM) 3909 cap sheet running the full length of the valley. - No vents will be placed in soffits, cornices, rakes, eaves, or eave overhangs, or between rafters at eaves or in other overhang areas. Gable end and dormer vents will be at least 10 feet from the property lines or provided with alternative designs that are resistant to ember penetration. Vents in allowed locations will be protected with wire mesh having no openings larger than 0.125 inches. Vent openings will not exceed 144 square inches. Vents will be designed to resist the intrusion of burning embers and debris. - Vents will not be placed on roofs unless they are approved for Class A roof assemblies and contain an approved baffle system, such as Brandguard or O'Hagin vents, to stop intrusion of burning material, or are otherwise approved. - Turbine vents are prohibited. - Exterior glazing in windows, sliding glass doors, and garage doors, or decorative or leaded glass in doors, will be dual pane with one tempered pane, glass block, or have a 20-minute fire rating. Glazing will comply with California Building Code Chapter 7A. - Any vinyl frames will have welded corners and metal reinforcement in the interlock area to maintain integrity of the frame certified to ANSI/AAMA/NWDA 101/I.SI. S 2 97 requirements. - Skylights will be tempered glass. - Rain gutters and downspouts will be noncombustible and designed to prevent the accumulation of leaf litter and debris, which can ignite roof edges. - Doors will conform to SFM 12-7A-1, or will be of approved noncombustible construction, or will be solid-core wood with stiles and rails not less than 1-3/8 inches thick, or have a 20-minute fire rating. Doors will comply with City of Santee Building Code Chapter 7A. Garage doors will be solid-core, 1.75-inch-thick wood or metal to comply with the City of Santee Building Code.

Table ES-1. Summary of Project Design Features

Project Design Feature	Summary Description of Feature
	<ul style="list-style-type: none"> - Decks and their surfaces, stair treads, landings, risers, porches, and balconies will comply with City of Santee Building Code Chapter 7A and be of ignition-resistant construction; heavy timber; exterior-approved fire-retardant wood; or approved, noncombustible materials. - Decks and overhangs projecting over vegetated slopes are not permitted. Decks will be designed to resist failing from the weight of a firefighter during fire conditions. Plastic or vinyl decking or railings are not allowed. The ends of decks will be enclosed with the same type of material as the remainder of the deck. - Combustible awnings, canopies, or similar combustible overhangs are not allowed. - No combustible fences will be allowed within 5 feet of structures on any lots. The first 5 feet from a structure will be noncombustible or meet the same fire-resistive standards as walls. - All chimneys and other vents on heating appliances using solid or liquid fuel, including outdoor fireplaces and permanent barbecues and grills, will have spark arrestors that comply with the City of Santee Fire Code, which requires that openings do not exceed 0.25 inches. Arrestors will be visible from the ground. - Any liquid propane gas tanks (except small barbecue and outdoor heater tanks), firewood, hay storage, storage sheds, barns, and other combustibles will be located at least 30 feet from structures and, within the FMZ, 30 feet from flammable vegetation. No flammable vegetation will be allowed under or within 30 feet of liquid propane gas tanks, or tanks will be enclosed in an approved, ignition-resistant enclosure with 10 feet clearance of flammable vegetation around it. In no case will a tank be closer than 10 feet from a structure. The City of Santee Fire Code requires 10 feet of clearance of native vegetation, weeds, and brush from under and around liquid propane gas tanks. - Storage sheds, barns, and outbuildings will be constructed of approved, noncombustible materials, including noncombustible Class A roofs, and will be subject to the same restrictions as the main structure on the site. - Any of the above-listed structures (e.g., outbuildings, storage sheds, barns, separate unattached garages) that are 500 square feet or smaller and 10 feet or more from an adjacent structure will not be required to include automatic fire sprinklers. Locations and required FMZs for these smaller structures will be subject to approval of the City of Santee's Fire Marshal and Building Official, based on the size of the structure. ▪ Interior Fire Sprinklers: Sprinklers in residences will be designed to provide additional time for occupants to escape the home, and sprinklers in multifamily and commercial structures will be designed to provide structural protection. Fire sprinklers are successful at assisting responding firefighters by either extinguishing a structural fire, or at least containing the fire to the room of origin and delaying flash-over. This benefit also reduces the potential for an open space-vegetation ignition by minimizing the possibility for structural fires to grow large and uncontrollable, resulting in embers that are blown into wildland areas. ▪ Firefighting Water: Water will be provided specifically for firefighting throughout the project site with fire hydrants that are accessible to fire engines. The project will provide firefighting water volume, availability, and sustained pressures to the SFD's satisfaction. Additionally, the project will provide the number and location of fire hydrants consistent with SFD Design Standards and the City of Santee Fire Code, and subject to SFD approval.

Table ES-1. Summary of Project Design Features

Project Design Feature	Summary Description of Feature
	<ul style="list-style-type: none"> ▪ Water Utilities Constructed First: As required by standard fire code regulations, before any combustible materials are brought onto the site for construction, the project must have all underground utilities in place; fire hydrants operational; water mains, curbs, gutters, sidewalks, and an approved all-weather roadway in place; and interim FMZs established and approved. ▪ Homeowner Education: Annual reminder notices will be provided to each homeowner encouraging them to review and be familiar with community evacuation protocols. The HOA will coordinate with local fire agencies to hold an annual fire safety and evacuation preparedness informational meeting. The meeting will be attended by representatives of appropriate fire agencies, and important fire and evacuation information will be reviewed. One focus of these meetings, and of the HOA's annual message, will be on the importance of each resident preparing and being familiar with their own <i>Ready, Set, Go!</i> evacuation plan. This proactive educational component of disclosing potential wildfire risks will be incorporated into the HOA's covenants, conditions, and restrictions.
Traffic and Circulation Features	
PDF-12A	<p>Traffic Control Plan. A traffic control plan will be prepared by the project proponent and implemented during construction, as required by the City of Santee and City of San Diego public improvement permits, which will be obtained to construct access roads to the residential developments and resort. The traffic control plan will include procedures that will be followed to properly and safely close lanes and redirect traffic, if necessary, during construction. Adherence to the traffic control plan will ensure that emergency response vehicles can safely access the project site and the vicinity, and that project construction will not conflict with established emergency evacuation routes. The traffic control plan will be consistent with the procedures and measures established by the Unified San Diego County Emergency Services Organization and County of San Diego in the Operational Area Emergency Operations Plan (2022), which has been adopted by both the City of Santee and City of San Diego. The traffic control plan will also ensure that construction activities comply with the applicable City of Santee ordinances and regulations related to road closures and roadway construction. Furthermore, the traffic control plan will include information on how contractors are to comply with applicable requirements set forth by the County of San Diego's Multi-Jurisdictional Hazard Mitigation Plan (2023) for emergency events.</p>
PDF-12B	<p>Intersection Safety Improvements. The following improvements, which are included as part of the development footprint, would be made at the following intersections to improve pedestrian and bicycle safety:</p> <ul style="list-style-type: none"> ▪ <i>West Hills Parkway and Mast Boulevard.</i> Bicycle detection (signal software upgrade and/or camera installation, or electro-magnetic loop detectors within the asphalt) to be added to the approaches of the intersection where Class II bicycle lanes are present. ▪ <i>West Hills Parkway and Carlton Oaks Drive.</i> Continental cross-walks installed at all legs of the intersection, pedestrian countdown signals installed at each corner of the intersection, and lead pedestrian intervals for all crossing phases of the intersection, if the current signal controller can accommodate it. These improvements are included within the off-site impact area included as part of the proposed project.

Table ES-1. Summary of Project Design Features

Project Design Feature	Summary Description of Feature
	<ul style="list-style-type: none"> ▪ <i>West Hills Parkway and Mission Gorge Road.</i> Bicycle detection (signal software upgrade and/or camera installation, or electro-magnetic loop detectors within the asphalt) to be added to the approaches of the intersection where Class II bicycle lanes are present.
Stormwater and Pollution Control Features	
PDF-13	<p>Stormwater Pollution Prevention Plan. A project-specific Stormwater Pollution Prevention Plan (SWPPP) in compliance with the effective Construction General Permit and Jurisdictional Runoff Management Programs for the City of Santee and City of San Diego will be prepared and implemented. The SWPPP will identify which construction best management practices (BMPs) will be implemented to prevent stormwater runoff, and will include a monitoring plan for measuring BMP effectiveness. BMPs will include practices to minimize the contact of construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) with stormwater. The construction SWPPP will also specify properly designed, centralized storage areas that will keep these materials out of the rain. When grading will be conducted during the rainy season, the primary BMPs selected will focus on erosion control (i.e., keeping sediment in place), and then on sediment control (i.e., keeping sediment on site). Measures will include a range of stormwater control BMPs, such as installing erosion-control materials (e.g., silt fences, staked fiber rolls, geofabric) to prevent silt runoff to storm drains and waterways, as well as sediment basin BMPs (e.g., sediment basins, check dams, sediment traps).</p>
PDF-14	<p>Storm Water Quality Management Plan. A Priority Development Project Storm Water Quality Management Plan (SWQMP) will be prepared that identifies site design and source- and pollutant-control best management practices (BMPs) to reduce the discharge of pollutants to the maximum extent practicable. The SWQMP will incorporate the following quantifiable and nonquantifiable sustainability features that will manage stormwater source and pollutant loads:</p> <ul style="list-style-type: none"> ▪ Prevent illicit discharges into the Municipal Separate Storm Sewer System (MS4). ▪ Install storm drain stenciling or signage. ▪ Protect outdoor materials storage areas from rainfall, run-on, run-off, and wind dispersal. ▪ Protect materials stored in outdoor work areas from rainfall, run-on, run-off, and wind dispersal. ▪ Protect trash storage areas from rainfall, run-on, run-off, and wind dispersal. <p>In addition, as identified in the project-specific Priority Development Project SWQMP, the proposed project will implement site design BMPs, where applicable and feasible. Site-design BMPs include the following:</p> <ul style="list-style-type: none"> ▪ Maintain natural drainage pathways and hydrologic features. ▪ Conserve natural areas, soils, and vegetation. ▪ Minimize impervious areas. ▪ Minimize soil compaction. ▪ Incorporate impervious area dispersion. ▪ Install landscaping with native and/or drought-tolerant species.

Table ES-1. Summary of Project Design Features

Project Design Feature	Summary Description of Feature
	<p>Low-impact development and stormwater pollutant control BMPs designed to retain, biofilter, and treat stormwater runoff generated on the project site will be implemented. Applicable BMPs are identified in the City of Santee's 2021 Jurisdictional Urban Runoff Management Program (JRMP), following the City of Santee's 2016 BMP Design Manual.</p> <p>A Green Street SWQMP will be prepared for the project components that fall within the City of San Diego's jurisdiction. The applicable source control and site design BMPs will be implemented, in addition to the Green Street elements specified in the project's Green Street SWQMP. Applicable BMPs are identified in the City of San Diego's 2025 JRMP and follow the City of San Diego's 2024 BMP Design Manual.</p>
PDF-15	<p>Scour and Erosion Prevention Measures. The project will incorporate the following features to eliminate potential scour and erosion of the proposed slopes adjacent to the floodway and floodplain:</p> <ul style="list-style-type: none">▪ Geotextile turf reinforcement mat that binds to the soil for slope surface stabilization and slope reinforcement.▪ Geotechnical soil reinforcement to ensure that high-flow velocities will not erode or damage the embankment.▪ Rock riprap and/or concrete energy dissipators for all storm drain outlets to reduce the rate of storm runoff velocity to a nonerosive level and to prevent erosion and siltation.
Scenic View Features	
PDF-16	<p>Security Fence Coloring. Security fences will be powder-coated and colored dark evergreen, dark brown, or black to make the safety fencing appear more see-through than untreated, light-grey fencing that can act as a visual barrier.</p>

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
3.1 Aesthetics and Visual Resources			
Implementation of the proposed project would not result in any potentially significant impacts related to aesthetics and visual resources.			
3.2 Air Quality and Health Risks			
Impact AQ-1: Expose Sensitive Receptors to Substantial Pollutant Concentrations.	PS	MM-AQ-1. Tier 4 Final Construction Equipment. The project will require heavy-duty, diesel-powered construction equipment used during construction to meet at least Tier 4 Final engine emission standards.	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
3.3 Biological Resources			
Impact BIO-1: Diegan Coastal Sage Scrub (City of San Diego).	PS	<p>MM-BIO-1. Mitigate Temporary and Permanent Impacts Within City of San Diego on Sensitive Upland Vegetation Communities. Direct permanent impacts on 0.08 acres of disturbed Diegan coastal sage scrub (outside of MHPA) and direct temporary off-site impacts on 0.11 acres of disturbed Diegan coastal sage scrub (outside of Multi-Habitat Planning Area), 0.19 acres total within the City of San Diego shall be mitigated at a 1:1 ratio in accordance with the Upland Mitigation Ratios provided in the City of San Diego Biological Guidelines (as specified in Table 3 of the Biological Guidelines). Prior to beginning any ground-disturbing activities or being issued grading permits by the City of San Diego, the applicant shall provide a contribution into the City of San Diego Habitat Acquisition Fund (HAF). The HAF fee calculated shall be based on the current market rate amount per acre set by Real Estate Assets Department (READ) each year at the trigger time. Per the City of San Diego Municipal Code, an additional 10% administration fee is required to be paid for City of San Diego HAF staff administration and maintenance costs. The 10% fee is calculated and applied after the mitigation HAF amount is determined based upon the required mitigation acreage/ratio. Documentation of this contribution shall be provided to the City of San Diego by the applicant prior to the issuance of any construction permit. (see MM-BIO-2 for complementary City of Santee measure).</p> <p>MM-BIO-7. Qualified Biologist to Provide Construction Monitoring. A qualified biologist shall be responsible for overseeing compliance with all laws, regulations, permit conditions, mitigation measures, and any other biological-resources requirements during project construction. Prior to the start of construction, a qualified biologist shall conduct environmental awareness training for all construction personnel. Topics to be included in the training include, but are not limited to, the construction limits, sensitive habitats, features, plants,</p>	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>and animal species to avoid, mitigation measure and/or permit condition requirements, seasonal or other time-related restrictions on construction, and measures related to erosion control and spill prevention. Environmental awareness training shall be repeated for any new construction personnel working on the site. The qualified biologist shall have, at a minimum, a bachelor's degree in biology, ecology, zoology, or a related field of science, and at least 2 years of field experience.</p> <p>MM-BIO-8. Delineate Environmentally Sensitive Areas. Sensitive vegetation communities, jurisdictional waters and wetlands, and other sensitive biological resources located outside of permanent and temporary impact areas shall be identified on the final construction plans as <i>environmentally sensitive areas</i> and protected with temporary fencing (e.g., orange snow fencing). A qualified biologist shall monitor the installation of the temporary fencing and ensure that it is installed prior to the start of clearing, brushing, grading, or other ground-disturbing construction activities. A qualified biologist shall inspect the temporary fencing at least twice weekly during grading and monthly after grading is complete, ensuring that it remains in place throughout construction.</p> <p>MM-BIO-9. Stormwater Pollution Prevention Plan. To control erosion and sedimentation and to preserve water quality, the applicant will obtain coverage for the project under the Construction General Permit (Order No. 2022-0057-DWQ). Prior to the issuance of grading permits, the applicant shall prepare a Stormwater Pollution Prevention Plan (SWPPP) to reduce the potential for water pollution and sedimentation from construction. Best management practices (BMPs) to be included in the SWPPP that must be submitted to the State Water Resources Quality Control Board shall include, but are not limited to, the following:</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ol style="list-style-type: none"> 1. The applicant shall not stockpile brush, loose soils, excavation spoils, or other similar debris material within sensitive habitats. 2. If visible dust is present during construction activities, then standard dust-suppression techniques (e.g., water spraying) shall be used in all ground-disturbance areas. 3. During construction activities, measures shall be in place to ensure that contaminants are not discharged from construction sites. The SWPPP will define areas where hazardous materials and trash would be stored, vehicles would be parked, fueled, and serviced, and construction materials would be stored. 4. Runoff, sedimentation, and erosion shall be minimized through the use of BMPs, such as water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures shall be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water, and preserve roadways and adjacent properties. 5. Equipment storage, fueling, and staging areas shall be located in upland sites, away from riparian areas and other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside of those previously specified, these maintenance activities will be performed at least 150 feet from all aquatic resources, or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project-related spills of hazardous materials shall be cleaned up immediately, and contaminated soils removed to approved disposal areas. 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>6. Measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment shall be implemented to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system.</p> <p>7. Measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills shall be implemented immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems.</p> <p>The applicant shall comply with the City of Santee's Stormwater Pollution Prevention Program, the specifics of which can be found on the City of Santee's website. Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the City of Santee at least 30 days prior to start of construction. Updated SWPPPs will be provided to the City of Santee on request during construction.</p> <p>MM-BIO-10. Speed Limits During Construction. The City of Santee shall require that vehicle speed limits within the project site will not exceed 25 miles per hour during project construction.</p>	
Impact BIO-2: Permanent Impacts on Sensitive Communities (City of Santee).	PS	<p>Implement MM-BIO-7 through MM-BIO-10, as described above.</p> <p>MM-BIO-2. Mitigate Permanent Impacts Within City of Santee on Sensitive Upland Vegetation Communities. Direct permanent impacts on disturbed Diegan coastal sage scrub and nonnative grassland within the City of Santee shall be mitigated at a 1:1 ratio either through the purchase of</p>	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>mitigation bank credits of Diegan coastal sage scrub (Option 1) or through off-site preservation or on-site creation and preservation of Diegan coastal sage scrub (Option 2).</p> <ol style="list-style-type: none"> 1. Option 1: The purchase of mitigation credits shall occur at a mitigation bank approved by the California Department of Fish and Wildlife (CDFW) in the local area or other location deemed acceptable by CDFW. The applicant shall provide evidence of purchase of credits to the City of Santee prior to being issued grading permits by the City of Santee. <i>Evidence of purchase</i> shall consist of the following items: <ol style="list-style-type: none"> a. A copy of the purchase contract referencing the project name and numbers for which the habitat credits were purchased. b. If not stated explicitly in the purchase contract, a separate letter must be provided identifying the entity responsible for the long-term management and monitoring of the preserved land. c. To ensure that the land shall be protected in perpetuity, evidence must be provided that a dedicated conservation easement or similar land constraint has been placed over the mitigation land. d. An accounting of the status of the mitigation bank shall be provided and include the total amount of credits available at the bank, the amount required by this project, and the amount remaining after use by this project. 2. Option 2: If habitat credit cannot be purchased in a mitigation bank, then the applicant shall provide for the off-site preservation or on-site creation and preservation of Diegan coastal sage scrub habitat at a 1:1 ratio, as described below, prior to being issued grading permits by the City of Santee. 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>a. Off-Site Preservation: The applicant shall provide for the off-site preservation of land that meets criteria for sensitive upland vegetation community mitigation through the recordation of a conservation easement at a location approved by the City of Santee and the Wildlife Agencies (U.S. Fish and Wildlife Service and CDFW) that will be managed in perpetuity under a Resource Management Plan (RMP) that establishes long-term monitoring, maintenance, management, and reporting directives. The RMP will be prepared as described in MM-BIO-6. Off-site mitigation shall occur within one of the following areas: (1) preserve areas in the City of Santee; (2) City of San Diego Multi-Habitat Planning Area; or (3) County of San Diego Pre-Approved Mitigation Areas. The off-site land being preserved must be at a location approved by the City of Santee and the Wildlife Agencies. Long-term management shall be funded through a non-wasting endowment in an amount determined through preparation of a Property Assessment Record or similar method for determining funding amount. The Conservation Easement shall be owned by a conservancy, or other similar, experienced entity, subject to approval by CDFW, and CDFW shall be listed as a third-party beneficiary.</p> <p>b. On-Site Restoration and Preservation. Diegan coastal sage scrub shall be restored and preserved on site at a 1:1 ratio through the recordation of a conservation easement at a location approved by the City of Santee, granted to an entity approved by the City of Santee, and restored pursuant to an Upland Restoration Plan described below. The Conservation Easement shall be owned by a conservancy, or other similar, experienced entity subject to approval by CDFW, and CDFW shall be listed as a third-party</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>beneficiary. The Upland Restoration Plan shall include the following:</p> <ul style="list-style-type: none"> i. Monitoring of the restoration areas will occur for a minimum of 5 years or until the fifth-year performance/success criteria are met to determine the successful completion of the 5-year mitigation and monitoring program. The performance standards and success criteria must be approved by the City of Santee and CDFW and shall include requirements for 100% survival of native shrub container-stock plantings at the first annual monitoring (or sufficient number of shrubs emerging from seed to replace the container stock), as well as Year 5 standards of native vegetation cover of at least 90% of that of a nearby Diegan coastal sage scrub reference site. Methods used to measure these performance standards shall be described, and, if the restored areas fail to meet the Year 5 standards after the full monitoring term, then a specific set of remedial measures will be developed and implemented, and the monitoring and maintenance period would be extended until all Year 5 standards are met, or as otherwise provided in this document. The Upland Restoration Plan must be approved City of Santee and CDFW prior to implementation. ii. In the absence of any restoration plan guidance from the City of Santee, the City of San Diego's <i>General Outline for Conceptual Revegetation/Restoration Plans</i> shall be used for guidance. 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> iii. The Upland Restoration Plan shall detail the installation, maintenance, and monitoring which would occur as part of the restoration effort. iv. The Upland Restoration Plan shall include an evaluation of restoration suitability specific to proposed vegetation types, soil preparation, plant palettes, irrigation, erosion control, maintenance and monitoring program, and success criteria. v. The applicant shall also secure performance bonds prior to being issued grading permits by the City of Santee. These bonds would be released after the City of Santee approves the final success of the restoration site. The specifics regarding long-term management and management funding will be included in a Resource Management Plan (RMP) that establishes long-term monitoring, maintenance, management, and reporting directives. The final RMP shall be prepared as described in MM-BIO-6. The RMP cannot be approved by the City of Santee or CDFW until the following has been completed: easements shall be dedicated, a qualified Resource Manager approved by the City shall be selected, and the RMP funding mechanism shall be in place. <p>MM-BIO-3. Mitigate Permanent and Certain Temporary Impacts Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities. Impacts on sensitive riparian and wetland vegetation communities shall be mitigated through on-site restoration, enhancement, and preservation of habitat. The impacts to sensitive riparian and wetland vegetation shall be mitigated at the mitigation ratios described below:</p> <ul style="list-style-type: none"> 1. Direct permanent impacts on disturbed wetland shall be mitigated at a 2:1 ratio through preservation of enhanced or restored native wetland habitat. 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ol style="list-style-type: none"> 2. Direct permanent impacts on mule fat – disturbed shall be mitigated at a 3:1 ratio through preservation of enhanced or restored riparian scrub habitat (mule fat and/or willow scrub). 3. Direct permanent impacts on southern cottonwood–willow riparian forest and southern cottonwood–willow riparian forest – disturbed shall be mitigated at a 3:1 ratio through preservation of enhanced or restored riparian forest habitat. 4. Direct temporary impacts on nonnative riparian communities shall be mitigated at a 1:1 ratio through preservation of enhanced or restored riparian or wetland habitat. 5. Direct temporary impacts on southern cottonwood–willow riparian forest (including disturbed) shall be mitigated at a 3:1 ratio through in situ re-establishment of riparian forest and preservation of enhanced or restored riparian forest. 6. Direct temporary impacts on mule fat scrub shall be mitigated at a 2:1 ratio through in-situ re-establishment of mule-fat scrub and enhancement of riparian scrub habitat. <p>The monitoring and restoration requirements for these sensitive riparian and wetland vegetation communities shall be identified in a Habitat Mitigation and Monitoring Plan (HMMP) (refer to MM-BIO-5) and Resource Management Plan (RMP) (MM-BIO-6). The HMMP must be approved by the resource agencies (U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife [CDFW]), and the RMP must be approved by the Wildlife Agencies (U.S. Fish and Wildlife Service and CDFW) prior to issuance of grading permits by the City of Santee.</p> <p>MM-BIO-5. Habitat Mitigation and Monitoring Plan (HMMP). To implement the restoration and enhancement of sensitive riparian and wetland vegetation communities as mitigation for loss of, or temporary impact on, those communities within the</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>project site, as described in MM-BIO-3 and MM-BIO-4, a final HMMP must be approved by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and the City of Santee prior to being issued grading permits by the City of Santee. The HMMP shall do the following:</p> <ul style="list-style-type: none"> ▪ The draft HMMP (Appendix K of the Biological Survey Report) shall be used as a basis for the final HMMP. The HMMP shall include details for the installation, maintenance, and monitoring of sensitive riparian and wetland vegetation that would occur after approval of the HHMP. ▪ Monitoring shall include monitoring of the restoration/enhancement areas for a minimum of 5 years or until fifth-year performance/success criteria are met. The HHMP shall include performance standards to determine the successful completion of the 5-year mitigation and monitoring program. Attainment of these standards shall indicate the restoration area is progressing toward the habitat functions and services specified in the HHMP. Methods used to measure these performance standards shall be described and if the restored area fails to meet the Year 5 standards after the full monitoring term, a specific set of remedial measures shall be developed, implemented, and the monitoring and maintenance period would be extended until all Year 5 standards are met or as otherwise provided in the HMMP. ▪ The HMMP shall include performance bonds that would be released after the City of Santee approves the final success of the restoration site. <p>MM-BIO-6. Resource Management Plan (RMP). To provide for the long-term management of the mitigation sites (i.e., on-site wetland mitigation sites and potential Diegan coastal sage preservation sites), an RMP shall be prepared by a qualified biologist to address long-term monitoring, maintenance,</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>management, and reporting directives, in perpetuity. The RMP shall be approved by the City of Santee and the Wildlife Agencies (U.S. Fish and Wildlife Service and California Department of Fish and Wildlife [CDFW]) and implemented prior to any ground disturbance activities or issuance of grading permits by the City of Santee. The RMP shall include the following:</p> <ul style="list-style-type: none"> ▪ Delineation of the limits of where the conservation easement will be recorded. ▪ Selection of a qualified Preserve Manager approved by the City of Santee and Wildlife Agencies. ▪ Requirements of long-term monitoring, maintenance, management, and reporting directives, in-perpetuity, approved by the City of Santee and Wildlife Agencies, that will be managed by the Preserve Manager. ▪ Monitoring requirements for the mitigation area for a minimum of 5 years or until fifth-year performance/success criteria are met. ▪ Draft performance standards to determine the successful completion of the 5-year mitigation and monitoring program. Attainment of these standards shall indicate that the restoration area is progressing toward the habitat functions and services specified in the RMP. Methods used to measure these performance standards will be described, and, if the restored area fail to meet the Year 5 standards after the full monitoring term, then a specific set of remedial measures will be developed and implemented, and the monitoring and maintenance period will be extended until all Year 5 standards are met, or as otherwise provided in the RMP. 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> Preparation of a Property Analysis Record prepared for endowment funding or similar cost estimation, to determine the size of a non-wasting endowment necessary to fund the annual costs for basic stewardship of the preserve. Identification of what entity would hold the endowment (or equivalent acceptable funding mechanism). <p>The final RMP document must include the additional following items:</p> <ul style="list-style-type: none"> Evidence of purchase of the mitigation land to be managed. Evidence that a conservation easement has been dedicated to CDFW, or other entity approved by CDFW to ensure that the land is protected in perpetuity. Acknowledgment that the resource manager accepts the responsibility for the management of the site. Establishment of an endowment or equivalent acceptable funding mechanism. Acknowledgment that the City of Santee has approved the entity that will be responsible for holding the endowment. 	
Impact BIO-3: Temporary Impacts on Sensitive Communities (City of Santee).	PS	<p>Implement MM-BIO-3 and MM-BIO-5 through MM-BIO-10, as described above.</p> <p>MM-BIO-4. Mitigate Temporary Dewatering Impacts on Sensitive Riparian and Wetland Vegetation Communities Within the City of Santee. Riparian and wetland vegetation communities within the City of Santee are considered sensitive by California Department of Fish and Wildlife. Direct temporary impacts on coastal valley freshwater marsh, fresh water, and nonnative riparian vegetation shall be mitigated through passive, in situ restoration of habitat to pre-dewatering conditions. The impacts shall be mitigated through implementation of the Habitat Mitigation and Monitoring Plan (refer to MM-BIO-5).</p>	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Impact BIO-4: Wetland Impacts.	PS	Implement MM-BIO-3 through MM-BIO-10 , as described above. MM-BIO-11. Wetland Permits. Impacts on jurisdictional wetland and waterway resources and occupied least Bell's vireo critical habitat would require permits and authorizations by the USACE, RWQCB, and CDFW prior to impacts. Prior to the approval of the grading plans, the applicant will provide the City of Santee with permits and authorizations from each resource agency, for project impacts related to aquatic resources and impacts on occupied least Bell's vireo riparian habitat, or provide evidence that no such permits are required. Impacts on sensitive wetland communities will be mitigated, at a minimum, as described in MM-BIO-3 and MM-BIO-4 . These resource agencies could require mitigation ratios higher than those described in MM-BIO-3 and MM-BIO-4 , but ratios will not be less than those described in MM-BIO-3 .	LTS
Impact BIO-5: Least Bell's Vireo Breeding Habitat (City of Santee).	PS	Implement MM-BIO-3 through MM-BIO-10 , as described above. MM-BIO-14. Mitigation, Monitoring, and Reporting Conditions for Potential Impacts on Occupied Least Bell's Vireo Habitat. Prior to the issuance of grading permits, the Cities of Santee and San Diego shall verify that the following project requirements regarding least Bell's vireo are shown on the construction plans. No clearing, grubbing, grading, or other construction activities shall occur during the least Bell's vireo breeding season (March 15 through September 15) until the following requirements have been met to the satisfaction of the applicable jurisdiction issuing the grading permit: <ol style="list-style-type: none"> 1. A qualified biologist shall perform a clearance survey in those wetland areas suitable for the presence of least Bell's vireo. Surveys for the species shall be conducted within the current breeding season, if applicable, and include at least 3 weekly surveys and monthly follow-up surveys. If least Bell's vireo is present, then the following conditions must be met: 	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> a. Occupied habitat shall be staked or fenced under the supervision of a qualified biologist; <u>and</u> b. From March 15 through September 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 A-weighted decibels (dBA) equivalent sound level (L_{eq}) hourly average (or to the ambient noise level if greater) at the edge of occupied least Bell's vireo habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA L_{eq} hourly average (or to the ambient noise level if greater) at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City of San Diego City Manager or the City of Santee City Planner (depending on applicable jurisdiction) at least 2 weeks prior to the commencement of construction activities in the affected area. Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities (avoidance buffers) shall be staked or fenced under the supervision of a qualified biologist. This noise analysis may include noise attenuation requirements, including altering grading operations, phasing grading, cessation of vehicle idling, and using quieter machinery near sensitive resources, to obtain the necessary noise levels; <u>or</u> c. At least 2 weeks prior to the commencement of construction activities in the affected area, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>activities will not exceed 60 dBA L_{eq} hourly average (or the ambient noise level if greater) at the edge of habitat occupied by least Bell's vireo. If a temporary noise barrier or berm is constructed, the qualified biologist must be present to ensure that the construction of the noise attenuation feature does not itself result in disruption of nesting behavior. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring (as described below) shall be conducted at the edge of the occupied habitat to ensure that noise levels do not exceed 60 dBA L_{eq} hourly average (or ambient noise levels if greater). If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, or the nesting activities are being substantially disrupted by adjacent construction activity, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16).</p> <p>2. Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dBA L_{eq} hourly average or to the ambient noise level if greater. If not, other measures shall be implemented in consultation with the biologist, the City of San Diego City Manager, or the City of Santee City Planner (depending on the applicable jurisdiction), as necessary, to reduce noise levels to below 60 dBA L_{eq} hourly average or to the ambient noise level if greater. Such measures may include limitations on the placement</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		of construction equipment and the simultaneous use of equipment.	
Impact BIO-6: Non-listed Special-Status Species Habitat.	PS	Implement MM-BIO-1 through MM-BIO-10 , as described above.	LTS
Impact BIO-7: Nesting Birds.	PS	<p>MM-BIO-12. Minimize Indirect Noise Impacts on Non-listed Riparian Birds and Raptors. The operation of construction equipment (e.g., backhoes, loaders, bulldozers, excavators, skid steers, graders) and construction activities (building construction) shall not occur within a “noise impact area” (as defined below) during the breeding seasons for yellow warbler, yellow-breasted chat, and vermilion flycatcher (February 15 through August 31), or nesting raptors (January 15 through July 15). If it is not feasible to avoid operation of construction equipment during any of these breeding seasons, then a pre-construction nesting survey shall be conducted within potential habitat of any of these species within 150 or 300 feet of proposed construction equipment activity. Pre-construction surveys shall be conducted by a qualified biologist no more than 72 hours prior to the start of construction to determine if active nests of these species are present within the areas potentially impacted by noise. The qualified biologist conducting the survey(s) shall have, at a minimum, a bachelor’s degree in biology, ecology, zoology, or a related field of science, and at least 2 years of experience conducting biological field surveys, including surveys for nesting birds.</p> <p>The “noise impact area” is defined as up to 300 feet from the noise source to the nest for raptors and up to 150 feet from the noise source to the nest for the cormorant rookery and for other sensitive riparian species, including yellow warbler, yellow-breasted chat, and vermilion flycatcher. If it is determined at the completion of pre-construction surveys that active nests belonging to yellow warbler, yellow-breasted chat, vermilion flycatcher, or raptors are absent from the noise</p>	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>impact area, construction shall be allowed to proceed. If pre-construction surveys determine the presence of active nests belonging to any of these sensitive species, then construction shall (1) be postponed within the noise impact area until a qualified biologist determines any nests are no longer active or until after the respective breeding season; (2) be conditionally allowed within portions of the noise impact area if intensive monitoring by the qualified biologist determines that nesting activities are not being substantially (i.e., adults appearing agitated, scolding more, attracting the attention of brown-headed cowbirds, or leaving the nest site more than average) disrupted by adjacent construction activity; or (3) not occur until a temporary noise barrier or berm is constructed at the edge of the construction limits and/or around the piece of equipment to ensure that noise levels within the noise impact area are reduced to below 1-hour average of 60 dBA L_{eq} or ambient noise levels, whichever is greater, at the nest location. Decibel output shall be confirmed by a qualified noise specialist, and intermittent monitoring by a qualified biologist shall be required to ensure that conditions have not changed. If a temporary noise barrier or berm is constructed, the qualified biologist must be present to ensure that construction of the noise attenuation feature does not itself result disruption of nesting behavior. Factors used to determine and guide the appropriate buffer distance shall include individual pair behavior responses, amount of buffering topography or structures, proximity to existing disturbance, and ambient noise levels.</p> <p>MM-BIO-13. Avoid Disturbance of Vegetation During Bird-Nesting Season. To comply with state and federal protections on nesting birds, clearing, trimming, and grubbing of vegetation shall occur September 1 through February 14 (i.e., outside of the general bird breeding season), and tree removal shall occur July 16 through January 14 (outside of the raptor</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>breeding season). If tree or vegetation trimming, clearing, or grubbing cannot feasibly occur outside of these breeding seasons, then pre-construction nesting surveys, as described below, shall be conducted by a qualified biologist prior to initiating vegetation trimming, clearing, or grubbing activities.</p> <p>The nesting survey for native birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall consist of one pre-construction nesting survey conducted no more than 72 hours prior to the commencement of vegetation trimming, clearing, or grubbing to determine if active nests of these species are present in the affected areas. If pre-construction surveys determine the presence of active nests, then construction shall (1) be postponed within the noise impact area until a qualified biologist determines any nests are no longer active or until after the respective breeding season; (2) be conditionally allowed within portions of the noise impact area if intensive monitoring by the qualified biologist determines that nesting activities are not being substantially (i.e., adults appearing agitated, scolding more, attracting the attention of brown-headed cowbirds, or leaving the nest site more than average) disrupted by adjacent construction activity; or (3) not occur until a temporary noise barrier or berm is constructed at the edge of the construction limits and/or around the piece of equipment to ensure that noise levels within the noise impact area are reduced to below 1-hour average of 60 dBA L_{eq} or ambient noise levels, whichever is greater, at the nest location. Decibel output shall be confirmed by a qualified noise specialist, and intermittent monitoring by a qualified biologist shall be required to ensure that conditions have not changed. If a temporary noise barrier or berm is constructed, the qualified biologist must be present to ensure that construction of the noise attenuation feature does not itself result disruption of nesting behavior. Factors used to determine and guide the appropriate buffer distance</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>shall include individual pair behavior responses, amount of buffering topography or structures, proximity to existing disturbance, and ambient noise levels.</p> <p>The qualified biologist shall determine the appropriate nest avoidance distance based on species type, habitat location and condition, and behavior of the nesting pair. The qualified biologist conducting the survey(s) shall have, at a minimum, a bachelor's degree in biology, ecology, zoology, or a related field of science, and at least 2 years of experience conducting biological field surveys, including surveys for nesting birds.</p> <p>MM-BIO-18. Homeowner Education Program. Prior to the issuance of a building permit for the residential homes on the project site, a homeowner education program shall be prepared by a qualified biologist for approval by City of Santee and distributed by the applicant to inform homeowners of the need to keep pets outside of the adjacent open space areas.</p>	
Impact BIO-8: Crotch's Bumble Bee.	PS	<p>MM-BIO-15. Conduct Crotch's Bumble Bee Pre-construction Surveys. Prior to the initiation of ground-disturbing activity during the Colony Active Period (April 1 through August 31), then pre-construction surveys for active bee nest colonies shall be required no more than 5 days prior to any ground disturbance or vegetation removal. The following method for nest surveys shall be used unless the Wildlife Agencies provide an updated method based on current understanding of bumble bee nests in the future:</p> <ul style="list-style-type: none"> Within non-developed habitats (golf course areas are considered to be developed), the biologist shall look for nest resources (e.g., burrows) suitable for bumble bee use. If an area of bumble bee activity is detected, the biologist shall watch potential nest resources for a period of time (up to 30 minutes if early in the Colony Active Period, and up to 10 minutes during the peak of the Colony Active Period) looking for exiting or entering worker bumble bees. 	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>Worker bees should arrive and exit an active nest site with frequency, although the rate can vary depending on whether it is early/late or at the peak of the Colony Active Period. If a bumble bee worker is detected, then a representative bee shall be identified to species. This should be possible without capture in San Diego County. Biologists shall ensure that 100% visual coverage of all potential burrow resources are surveyed. Therefore, the biologist shall select a view that balances viewing multiple burrows while ensuring detection if bees are present. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point, but this limit shall not exceed 50 feet. The biologist shall reduce the 50-foot limit as necessary to ensure 100% visual coverage of potential burrow resources depending on topography, vegetation height and cover, and other factors. This approach shall allow the biologist to assess multiple burrows at one time to sufficiently determine if bees are entering/exiting them. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes). A photo voucher of the bee species shall be collected, and the location mapped using GPS. If identification is not feasible without capture, then the project proponent shall consult with the California Department of Fish and Wildlife prior to allowing the biologist to capture and identify to species (using the protocol for the California Bumble Bee Atlas project managed by the Xerces Society) to determine if a California Endangered Species Act Memorandum of Understanding and/or Scientific Collecting Permit would be required.</p> <ul style="list-style-type: none"> ▪ A written survey report shall be submitted to the City of Santee and City of San Diego within 30 days of the pre-construction nest surveys. The report shall include survey methods, weather conditions, and survey results, including 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>botanical results, a list of insect species observed, and a figure showing the locations of any Crotch's bumble bee nest sites or individuals observed (as appropriate for the level of survey required). The survey report shall include the qualifications of the surveyor(s) and approved biologist(s) for identification of photo vouchers and a detailed habitat assessment. If Crotch's bumble bee nests are observed, location information shall be submitted to the California Natural Diversity Database at the time of, or prior to, submittal of the survey report.</p> <ul style="list-style-type: none"> ▪ If a Crotch's bumble bee nest is detected, the project biologist shall establish, monitor, and maintain a no-work buffer around the nest. The size and configuration of the no-work buffer shall be based on best professional judgement of the project biologist in consultation with the Wildlife Agencies. The buffer shall provide at least 50 feet of clearance around nest entrance(s). Construction activities shall not occur within the no-work buffer until the colony is no longer active. To determine that a nest is no longer active, the nest shall be observed for a minimum of 60 minutes each day across a minimum of 3 days during suitable flight weather (i.e., ambient air temperature between 60 °F and 90 °F, winds under 10 miles per hour, and no precipitation higher than a drizzling rain). If no bees are seen flying in or out of the nest by the end of the observation period, it shall be determined that the nest is no longer active. If project activities occur outside of the Colony Active Period, then pre-construction surveys for active bee nest colonies and avoidance measures are not required. 	
Impact BIO-9: Western Spadefoot.	PS	<p>MM-BIO-16. Western Spadefoot Pre-construction Survey. During the rainy season (typically begins with the first rains in October) prior to the issuance of the grading permit, the project must either perform an egg mass/larval survey for western</p>	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>spadefoot within standing water in the biological study area (BSA) or perform nocturnal eyeshine surveys for adults across the BSA. If performed, egg mass/larval surveys must be performed in March and/or April. If performed, nocturnal adult surveys must be performed during or the night after the first three large (0.25-inch or greater) rain events of the winter. If the standing water or nocturnal survey is negative, then no additional measures are required. If the surveys find western spadefoot, then a 1,500-foot buffer shall be applied, originating from the breeding resource. The buffer area between the BSA open space limit and farthest project impact limit shall be enclosed by exclusion fencing. That interior area shall be surveyed during the first three rain events, and western spadefoot shall be relocated outside of the buffer area within the BSA. A relocation plan shall be prepared that identifies the specific methods and relocation areas, shall be prepared prior to implementation, and shall be approved by the lead agency. Any permits required to perform this task shall be acquired.</p> <p>This measure is not required north of the San Diego River (north) because that section of the San Diego River does not provide suitable habitat for western spadefoot and would provide a suitable buffer if spadefoot were found south of there.</p>	
Impact BIO-10: Western Burrowing Owl.	PS	<p>MM-BIO-17. Western Burrowing Owl Pre-construction Survey. Prior to grading activities, the project shall determine if suitable burrowing owl nesting and overwintering habitat occurs within the project site based on a current habitat assessment. If suitable burrows are identified (e.g., greater than 11 centimeters in diameter and greater than 150 centimeters in depth), then the following shall be implemented:</p> <ul style="list-style-type: none"> Pre-construction burrowing owl surveys shall be conducted consistent with the 2012 California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl 	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>Mitigation. No more than 14 days prior to the initiation of project activities, a qualified biologist shall conduct at least two surveys at least 7 days apart, with the final survey conducted no more than 48 hours prior to the initiation of project activities. A report of the survey results, including mapping of any occupied burrows (including natural or constructed), burrowing owls, or burrowing owl sign observed, shall be submitted to the Cities of Santee and San Diego for their review and approval prior to initiation of project activities. Pre-construction surveys that are not seasonally dependent shall be required whenever ground disturbance is planned to address potential impacts during both overwintering and nesting seasons. If the survey is negative, then nothing more is required. If an occupied burrow or burrowing owl is found, then the following measures shall be implemented:</p> <ul style="list-style-type: none"> - Depending on the jurisdiction (City of Santee/City of San Diego) and their respective Multiple Species Conservation Program requirements at the time, either those requirements shall be implemented, or a CDFW 2081 Incidental Take Permit shall be secured and the following shall be implemented unless superseded by the Multiple Species Conservation Program or Incidental Take Permit: - Project activities shall be restricted within occupied burrowing owl habitat (inclusive of the appropriate buffer) during the breeding season (February 1 through August 31) until nesting is complete (i.e., the young have dispersed and are fledged, independently foraging, and no longer using the burrows or burrow complex, and/or adults are no longer nesting). - During the breeding season, buffers shall be established by a qualified biologist consistent with guidance provided in the 2012 CDFW Staff Report on 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>Burrowing Owl Mitigation. Appropriate buffer size shall depend on the time of year, level of disturbance, and project-specific site conditions. Buffers around active nesting sites shall be a minimum of 200 meters (656 feet) regardless of the time of year. The monitoring biologist shall have the authority to order stop work if burrowing owls exhibit distress or abnormal behavior and shall consult with the appropriate entities to determine next steps (e.g., stop work or increase buffers).</p> <ul style="list-style-type: none"> - Where impacts to burrowing owl are unavoidable, the following measures shall be required: <ul style="list-style-type: none"> - If suitable but unoccupied burrows cannot be avoided, burrow exclusion may be appropriate. Burrow exclusion shall only be allowed after the burrow has been determined by a qualified biologist to be inactive. No exclusions shall be permitted during the nesting season when there is evidence of burrowing owl activity. Prior to the initiation of any burrow exclusions, a Burrow Exclusion Plan shall be submitted to the Cities of Santee and San Diego and CDFW for review and approval. - Mitigation for impacts to occupied habitat shall occur through the conservation of occupied burrowing owl habitat at a ratio of no less than 1:1 for the territory of the burrowing owl. If occupied burrowing owl habitat is not available for mitigation within the Santee Subarea Plan Area, lands with potential to be occupied through appropriate restoration, management, and enhancement of burrowing owl nesting and foraging requirements may be considered. The land to be conserved shall be approved by the Cities of Santee and San Diego and CDFW. The land to be conserved 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		shall be secured by a legal instrument (e.g., conservation easement) to the satisfaction of CDFW.	
Impact BIO-11: Cormorant Rookery.	PS	Implement MM-BIO-7 , MM-BIO-8 , and MM-BIO-12 , as described above.	LTS
Impact BIO-12: Construction Noise.	PS	Implement MM-BIO-12 and MM-BIO-13 , as described above.	LTS
Impact BIO-13: Indirect Human Activity.	PS	Implement MM-BIO-18 , as described above.	LTS
Impact BIO-14: Domestic Animals.	PS	Implement MM-BIO-18 , as described above.	LTS
Impact BIO-15: Water Quality.	PS	Implement MM-BIO-9 , as described above.	LTS
Impact BIO-16: Fugitive Dust.	PS	Implement MM-BIO-9 and MM-BIO-10 , as described above.	LTS
3.4 Cultural and Tribal Cultural Resources			
Impact CUL-1: Potential to Affect Archaeological Resources.	PS	<p>MM-CUL-1. Retention of Qualified Archaeologist. Prior to the start of any ground-disturbing activity, provide evidence to the City of Santee that a Qualified Archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology has been contracted by the Applicant to implement the Archaeological Monitoring program and carry out all mitigation measures related to archaeological resources.</p> <p>Within 60 days after construction is complete, the qualified archaeologist will prepare and submit to the City of Santee for review a final monitoring report that will discuss the monitoring program, its results, and approval and provide interpretations about the recovered materials, noting, to the extent feasible, each item's class, material, function, and origin. Any new cultural sites or features encountered will be recorded with the SCIC at San Diego State University.</p> <p>MM-CUL-2. Preconstruction Cultural Resources Sensitivity Training. Prior to the approval of grading permits, a qualified archaeologist will prepare cultural resources sensitive training</p>	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>materials for use during project-wide Worker Environmental Awareness Training (or equivalent). The cultural resources sensitivity training will be conducted by a qualified environmental trainer working under the supervision of a qualified archaeologist. The qualified archaeologist will determine and ensure the suitability of the qualified environmental trainer. The cultural resources sensitivity training will be conducted for all construction personnel. Construction personnel will be informed of the types of archaeological resources that may be encountered and the proper procedures to be implemented in the event of an inadvertent discovery of archaeological resources or human remains. The City of Santee will ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.</p> <p>MM-CUL-3. Installation of Exclusionary Signage. Prior to the approval of grading permits, exclusionary temporary environmentally sensitive area signage will be installed to ensure that Site P-37-000204/CA-SDI-204 is not inadvertently affected during project construction. The exclusionary signage will encompass the mapped site boundary and be spaced no more than 20 feet apart; in order to discourage unauthorized disturbance, vandalism, or collection of artifacts, signage will not identify the protected areas as demarcating archaeological resources. Work within the delineated area will be limited to no new ground disturbance within the mapped boundaries of Site P-37-000204/CA-SDI-204 outside of approved areas where data recovery will be performed.</p> <p>MM-CUL-4 Capping Site P-37-000204/CA-SDI-204. Avoidance of impacts to archaeological site P-37-000204/CA-SDI-204 will be conducted through a combination of site-capping and avoidance, where feasible within the site boundaries. Prior to approval of grading permits, a site-capping plan will be prepared by a qualified archaeologist who meets or exceeds</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>the Secretary of Interior's Professional Qualifications Standards for archaeology. The plan will be reviewed and approved by the Project Director for the City of Santee with input from Native American tribal groups who have consulted on the project. The plan will include the following steps:</p> <ul style="list-style-type: none"> ▪ To ensure that potential archaeological deposits remain intact, proposed work within the site boundary will require capping of the site that includes placing a geotextile fabric across the existing ground surface and covering that ground surface with a layer of clean fill where project components are proposed and/or placing ground-protecting mats in areas of ingress and egress within the site. ▪ The exception to this will be the new storm drains, which, by the nature of their design, cannot be installed aboveground; data recovery will be conducted within the ground disturbance footprint. ▪ Any proposed grading will only occur within new fill. ▪ This mitigation measure will not apply to non-project-related routine maintenance and operations activities that are regularly conducted for the golf course. <p>MM-CUL-5. Development and Implementation of Cultural Resources Monitoring Plan. Prior to the start of any project-related ground-disturbing activities or issuance of grading permits, a qualified archaeologist will prepare a Cultural Resources Monitoring Plan (CRMP) that will stipulate the location and timing of archaeological and Native American monitoring, including, but not limited to, the monitoring of all ground-disturbing activities within 250 feet of P-37-000204/CA-SDI-204.</p> <p>The CRMP will include monitoring protocols to be carried out during project construction and stipulate that a Native American monitor associated with one or more of the Native</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>American groups that have expressed interest in the project be retained to monitor all project-related ground disturbance stipulated in the CRMP. In preparing the CRMP, the Native American groups that have expressed interest in monitoring will be consulted regarding monitor scheduling, and a Native American–monitoring schedule will be incorporated into the CRMP. The CRMP will contain an allowance that a qualified archaeologist, based on observations of subsurface soil stratigraphy or other factors during initial grading, and in coordination with the Native American monitor(s) and the City of Santee, may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering archaeological deposits is low.</p> <p>The plan will outline the appropriate measures to be followed in the event of an unanticipated discovery of cultural resources during project implementation, including that all ground disturbance within 100 feet of an unanticipated discovery will cease until a treatment plan is developed by a qualified archaeologist in coordination with the City of Santee and the Native American monitor(s) that will consider the resources archaeological and tribal value. The CRMP will identify avoidance as the preferred manner of mitigating impacts to cultural resources. The plan will establish the criteria utilized to evaluate the significance (per CEQA) of the discoveries, methods of avoidance consistent with CEQA Guidelines Section 15126.4(b)(3), as well as identify the appropriate treatment to mitigate the effect of the project if avoidance of a significant resources is determined to be infeasible. The CRMP will also include provisions for the treatment of archaeological sites that qualify as unique archaeological resources pursuant to PRC Section 21083.2, which places limits on the costs of mitigation for unique archaeological resources. The plan will also include reporting of monitoring results within a timely manner, curation of artifacts and data at an approved facility, and dissemination</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>of reports to local and state repositories. The CRMP will be submitted to the City of Santee for review and approval prior to approval of grading permits, as well as to the Native American groups that have expressed interest in the proposed project for review and comment.</p> <p>MM-CUL-6. Development and Implementation of a Data Recovery Plan. Where avoidance and or site-capping is infeasible, or if any part of the intact portion of Site P-37-000204/CA-SDI-204 is affected by ground disturbance, or if the City of Santee, in coordination with the qualified archaeologist, determines that an unanticipated discovery is a historical resource, and data recovery is the only feasible mitigation, then an archaeological Data Recovery Plan (DRP) will be designed and implemented to record and remove scientifically important data that would otherwise be destroyed through construction-related ground disturbance, per CEQA Guidelines 15126.4(b)(3)(C). The DRP will include historic context, research design, expected feature types, data recovery thresholds, data recovery field and laboratory methods, the artifact-disposition policy, and reporting requirements.</p> <p>The DRP and data recovery fieldwork will be completed prior to the start of or resumption of project construction. After the archaeological data recovery fieldwork is complete, the qualified archaeologist will prepare an archaeological Data Recovery Report that conforms with the California Office of Historic Preservation's recommended contents and format for cultural resources reports. The report will be submitted to the City of Santee for review; on the City of Santee's determination that the report is satisfactory, it will be repositied at the SCIC. Any artifacts collected during data recovery will be curated at the San Diego Archaeological Center, at the project proponent's expense. This report will be deemed acceptable by the City of Santee prior to any project-related ground-disturbing activities or issuance of grading permits. In cases of</p>	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		unanticipated cultural resource discoveries requiring data recovery, data recovery work and the report will be deemed acceptable by the City of Santee prior to the resumption of construction activities within the potentially impacted portion of the resource.	
Impact CUL-2: Potential to Affect Unknown Human Remains.	PS	Implement MM-CUL-5 and MM-CUL-6 , as described above. MM-CUL-7. Contact Authorities if Human Remains Are Encountered. Human remains are known to be located in the proposed project area. Should additional human remains be found within the project beyond those already identified in this report, their location will be incorporated into P-37-000204/CA-SDI-204. California Health and Safety Code Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains and that no further disturbance occur until the County Coroner has made a determination of origin and disposition, pursuant to PRC Section 5097.98. If the remains are determined to be Native American, then the County Coroner must contact the NAHC, which will assign a Most Likely Descendant. Per PRC Section 5097.98(b), the landowner will confer with the Most Likely Descendant about all reasonable options regarding the disposition of the remains. In addition, according to California Health and Safety Code, six or more human burials at one location constitutes a cemetery (California Health and Safety Code § 8100), and disturbance of Native American cemeteries is a felony (California Health and Safety Code § 7052). Although there are known human remains in the project area, with the implementation of mitigation measures, the project will avoid potentially significant impacts on human remains. Public Resources Code Section 5097.98, CEQA Section 15064.5, and Health & Safety Code Section 7050.5 will be followed in the event that human remains are discovered.	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Impact TCR-1: Potential to Impact Tribal Cultural Resources.	PS	Implement MM-CUL-1 through MM-CUL-7 , as described above.	LTS
3.5 Energy			
Implementation of the proposed project would not result in any potentially significant impacts related to energy.			
3.6 Geology and Soils			
Impact GEO-1: Potential to Exacerbate Conditions That Would Result in Liquefaction (City of Santee).	PS	MM-GEO-1. Geotechnical Recommendations. Prior to the issuance of a grading permit, the applicant will demonstrate that the recommendations and specifications contained in the geotechnical investigations conducted for the project site and off-site areas have been incorporated into the final project design and construction documents as minimum project requirements to the satisfaction of the City of Santee Director of Engineering. The recommendations are discussed in detail in the reports prepared by Geocon and updated in 2024 (Appendices G1 and G2). The geotechnical recommendations include, but are not limited to, general geotechnical recommendations, soil and excavation characteristics, soluble sulfate exposure, grading, seismic design criteria, slope stability, corrosive potential, foundation and concrete slab on-grade, post-tensioned foundation system parameters, pavement recommendations, retaining walls and lateral loads, slope maintenance, grading and foundation review, site drainage and moisture protection, grading plan review, and recommended grading specifications. Recommendations also include remedial grading for the areas containing artificial fill or young alluvium saturated by groundwater, as well as recommendations for the bridge pier foundations for the bridge proposed from Residential North to the Resort site. Lastly, the human-made lakes present at both Residential North and Residential West would need to be dewatered and evaluated by an engineer with respect to remedial grading.	LTS
Impact GEO-2: Potential to Exacerbate Conditions That	PS	Implement MM-GEO-1 , as described above.	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Would Result in Lateral Spreading or Soil Collapse (City of Santee).			
Impact GEO-3: Potential to Disturb Buried Paleontological Resources.	PS	<p>MM-GEO-2. Paleontological Monitoring in Areas of Sensitivity. To address potentially significant impacts to paleontological resources, a monitoring program will be implemented.</p> <p>To reduce potential impacts on paleontological resources, all proposed grading and excavating to depths greater than 10 feet will be monitored by a qualified paleontologist(s) and approved by the City of Santee, notification would be provided to the City of San Diego, and monitoring would be paid for by the project proponents. Specifically, the project proponent and/or its construction supervisor will ensure that the following measures are implemented:</p> <ul style="list-style-type: none"> ▪ Preconstruction Personnel and Repository: Prior to approval of grading permits, a qualified project paleontologist will be retained to oversee the mitigation program. A qualified project paleontologist is a person with a doctorate or master's degree in paleontology, or a related field, and who has knowledge of the County of San Diego paleontology and documented experience in professional paleontological procedures and techniques. In addition, a regional fossil repository, such as the San Diego Natural History Museum, will be designated by the City of Santee or the City of San Diego depending upon where the resource is found, to receive any discovered fossils. ▪ Preconstruction Meeting: The project paleontologist will attend the preconstruction meeting to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. ▪ Preconstruction Training: The project paleontologist will conduct a paleontological resource training workshop to be attended by earth-excavation personnel. 	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ During-Construction Monitoring: A project paleontologist or paleontological monitor will be present during all earthwork in formations with moderate to high paleontological sensitivity. A paleontological monitor (working under the direction of the project paleontologist) will be on site on a full-time basis during all original cutting of previously undisturbed deposits of Pleistocene terrace deposits (moderate paleontological potential), ancient landslide deposits (moderate paleontological potential), Stadium Conglomerate (high paleontological potential), and Friars Formation (high paleontological potential) to inspect exposures for unearthed fossils. Areas to be monitored will include, but would not be limited to, the majority of the proposed project. ▪ During-Construction Fossil Recovery: If fossils are discovered, then the project paleontologist (or paleontological monitor) will recover them. In most cases, fossil salvage can be completed in a short period of time. However, some fossil specimens (e.g., a bone bed or a complete large mammal skeleton) may require an extended salvage period. In these instances, the project paleontologist (or paleontological monitor) has the authority to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. A regional fossil repository, such as the San Diego Natural History Museum, will be designated by the City of Santee or the City of San Diego depending upon where the resource is found, to receive any discovered fossils. ▪ Post-Construction Treatment: Fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, and cataloged. ▪ Post-Construction Curation: Prepared fossils, along with copies of all pertinent field notes, photos, and maps, will be deposited in the designated fossil repository. 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ Post-Construction Final Report: A final summary paleontological mitigation report that outlines the results of the mitigation program will be completed and submitted to the City of Santee within 2 weeks of the completion of each construction phase of the proposed project. This report will include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, inventory lists of cataloged fossils, and significance of recovered fossils. 	

3.7 Greenhouse Gas Emissions

Implementation of the proposed project would not result in any potentially significant impacts related to greenhouse gas emissions.

3.8 Hazards and Hazardous Materials

Implementation of the proposed project would not result in any potentially significant impacts related to hazards and hazardous materials.

3.9 Hydrology and Water Quality

Impact HYD-1: Potential to Place New Development Within the Regulatory Floodway and Floodplain Limits.	PS	MM-HYD-1: Approval of a Conditional Letter of Map Revision and Letter of Map Revision. Prior to issuance of any grading permit, the project applicant shall obtain approval of the CLOMR from FEMA. The CLOMR will include revised local base - flood elevations based on current modeling of the project site. The building pads for all on-site structures will be set a minimum of 1 foot above the maximum 100-year water-surface elevations on the project site associated with the river flow rates as provided in Table 11.36.070 of the City of Santee's Flood Damage Prevention Ordinance. Prior to building permit issuance, the applicant will obtain a LOMR that is approved by FEMA and demonstrate that no building pads would be placed below 1 foot above the calculated local base-flood elevations. The LOMR would officially revise the current FIRM map to show changes to the floodplain, floodway, and flood elevations.	LTS
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3.10 Land Use and Planning

Implementation of the proposed project would not result in any potentially significant impacts related to land use and planning.

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
3.11 Mineral Resources			
Implementation of the proposed project would not result in any potentially significant impacts related to mineral resources.			
3.12 Noise and Vibration			
Impact NOI-1: Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels in Excess of Established Standards.	PS	<p>RCM-NOI-1. Restrict project construction activity to the days and hours permitted by the City of Santee Municipal Code. Construction equipment at the project site will not be started, idled, moved, or operated on Mondays through Saturdays, except between the hours of 7:00 a.m. and 7:00 p.m., or at any time on Sundays or City of Santee-recognized holidays, unless expressly approved by the City of Santee's Director of Engineering.</p> <p>RCM-NOI-2. Provide construction notices to all property owners and residents within 300 feet of the project site. A City of Santee-approved construction notice will be prepared for the project that describes the project and its expected duration and provides a point of contact to resolve noise complaints. The project proponent will coordinate with the City of Santee to ensure that the notice is approved in advance of construction. The notice will be delivered to all property owners and residents within 300 feet of the project site at least 10 days before the start of construction.</p> <p>RCM-NOI-3. Notify the Noise Control Officer of emergency generator use. In the event of an emergency that requires the use of the sewer lift-station emergency generator to maintain the safe operation of the lift station, the Noise Control Officer must be notified as soon as practical after the emergency. If possible, the Noise Control Officer should be notified in advance.</p> <p>RCM-NOI-4. Provide construction notices to all property owners and residents within 300 feet of the project site. The sewer lift-station emergency generator shall be designed, modified, or</p>	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>equipped to reduce sounds produced to the lowest possible level consistent with its effective operation.</p> <p>MM-NOI-1. Implement the noise-control measures to meet the city's 65 dBA L_{dn} noise threshold at the private rear yards. Prior to Certificate of Occupancy, a 6-foot noise barrier would be required along Carlton Oaks Drive to reduce noise levels at Residential North and along West Hills Parkway to reduce noise levels at Residential West to below the City's 65 dBA L_{dn} noise threshold. The location of the 6-foot barriers are shown on the landscape plans. The barriers must be constructed of a non-gapping material consisting of masonry, ½ inch thick glass, earthen berm or any combination of these materials.</p> <p>MM-NOI-2. Conduct an acoustical study to reduce interior noise levels at noise-sensitive areas of proposed residential development. Mitigation is required at the proposed Residential West and to the single-family homes adjacent to Carlton Oaks Drive within the proposed Residential North. Prior to the issuance of building permit(s) for the identified homes as shown on the landscape plans, the applicant will retain a qualified acoustical consultant to prepare an acoustical report to address interior noise levels at the homes. The specific noise limits to be achieved are described below. The analysis will be submitted to the City of Santee's Planning & Building Director for approval. The recommendations of the report will be incorporated into the project's site and architectural plans and be implemented during project construction. The acoustical report will satisfy the following requirements:</p> <ul style="list-style-type: none"> ▪ The acoustical report will evaluate the designs and provide recommendations, as necessary, to ensure that interior noise levels due to exterior noise sources will not exceed 45 dB L_{dn}. ▪ Techniques to achieve the required noise control may include, but are not limited to, the following: 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> - Orient bedrooms away from noise sources. - Limit the size and number of openings (e.g., windows, doors) and penetrations (e.g., vents, pipes, conduits) on exterior facades, especially facades facing the street. - Use sound-rated doors and windows. - Upgrade construction of walls, roofs, and attics, including added insulation. - Add a mechanical ventilation/air-conditioning system so that a habitable environment can be maintained with doors and windows closed. <p>MM-NOI-3. Restrict the style, timing, and location of music permitted on site. The following restrictions will be applied to the project and be included as conditions of approval in the project's conditional use permit (CUP).</p> <ul style="list-style-type: none"> ▪ No exterior music or amplified sound (including speech) will occur at the project site after 10:00 p.m. ▪ Live or amplified music will be permitted only at the outdoor patio of the clubhouse/restaurant or inside the banquet hall. ▪ All windows and doors to the exterior of the building from the banquet hall will remain closed while music is being performed inside the banquet hall. ▪ The following restrictions will apply to music at the outdoor patio of the clubhouse/restaurant: <ul style="list-style-type: none"> - Music may include amplified vocals and amplified instruments, such a guitar or piano/keyboard, but will not include live drums or percussion (either amplified or non-amplified). - Music will be restricted to acoustic-style performances with no more than two performers. 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> - Music levels will be compatible with background entertainment of guests and diners at the clubhouse/restaurant patio. Additional amplification (e.g., amplification to extend music performance audio to other areas of the project) will not be permitted. 	
Less than Significant Impact: Generate Excessive Groundborne Vibration or Groundborne Noise Levels.	LTS	<p>MM-NOI-4. Observe buffer distances during project construction. During all construction activity at the project site, the project proponent will require its construction contractor(s) to observe the following buffer distances to reduce groundborne vibration at nearby off-site buildings per Federal Transit Administration thresholds:</p> <ul style="list-style-type: none"> ▪ Avoid vibratory compaction within 100 feet of residential buildings. <p>If the listed buffer distance cannot be maintained, alternative equipment can be used that avoids or reduces high vibrational levels at the source. Non-vibratory rollers may be used in place of vibratory rollers.</p>	LTS
Impact C-NOI-1: Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels.	PS	Implement MM-NOI-1 , as discussed above.	LTS
3.13 Population and Housing			
Implementation of the proposed project would not result in any potentially significant impacts related to population and housing.			
3.14 Public Services			
Implementation of the proposed project would not result in any potentially significant impacts related to public services.			
3.15 Recreation			
Impact REC-1: Construction of Recreational Facilities That Have the Potential to Result in Significant Impacts to the Environment.	PS	Applicable mitigation measures from other resource topics including air quality and health risk, biological resources, cultural and tribal cultural resources, hydrology and water quality, noise and vibration, and transportation and circulation in this EIR. No additional mitigation is required.	LTS

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Impact C-REC-1: Construction of Recreational Facilities That Have the Potential to Result in Significant Cumulative Impacts to the Environment.	PS	Refer to Impact REC-1 , above.	LTS
3.16 Transportation and Circulation			
Impact TRA-1: Generate Vehicle Miles Traveled in Exceedance of Thresholds for Residential Uses.	PS	<p>MM-TRA-1. Implement TDM Measures. To reduce project-related vehicle miles traveled (VMT), the project applicant will implement the following Traffic Demand Management (TDM) measures included in the Mobility Management VMT Reduction Calculator Tool.</p> <ul style="list-style-type: none"> ▪ Voluntary Employer Commute Program: The project applicant will prepare and implement a TDM plan for which their employees volunteer to participate. The TDM plan may include measures such as the following. <ul style="list-style-type: none"> - Enroll in the San Diego Association of Governments' (SANDAG) iCommute Program. - Provide ride-match assistance to employees for carpooling (Strategy 1C). - Implement a vanpool program and subsidies (Strategy 1E). - Inform employees about the different resources available to reduce their commute trips. - Subsidize transit passes for employees who elect to take transit to work (Strategy 1D). - Provide on-site bicycle racks and showers for employees who elect to ride their bicycle to work. ▪ Employer Carpool Program: The hotel and restaurant will implement an employer carpool-assistance program for their employees. Additionally, the HOA will also implement a similar program for residents. 	SU

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ Employer Transit Pass Subsidy: The project applicant will provide transit-pass subsidies for employees who elect to take transit to work. However, due to the limited transit service accessing the proposed project site (Route 834), no reduction is assumed for this strategy. ▪ Employer Vanpool Program: The project applicant will coordinate with SANDAG's iCommute program to implement a vanpool program, if feasible for an identified group of employees. ▪ Parking Pricing: The hotel component of the project will charge a parking fee, which will be included in the resort fee. Hotel patrons will be provided with a rebate if they did not use a personal or rented vehicle to access the hotel. ▪ Parking Cash Out: The resort employees will be incentivized not to drive to work as a single driver and will be provided a TDM reward payment (amount to be determined later) for driving with a carpool group (i.e., three people or more). ▪ Bicycle Share: The proposed project will provide a bicycle-share service to hotel guests. Guests will be able to check out communal bicycles from the front desk or clubhouse of the hotel, which will allow guests to ride to different parts of the city, such as the Town Center or along the San Diego River Trail. However, this strategy will not be applicable toward VMT reduction because this measure is intended to be a citywide measure to be effective. 	

Table ES-2. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ Community-Based Travel Planning: It is assumed that the proposed project's HOA will provide information about alternative modes of transportation to residents and tenant as a part of their New Resident or New Tenant package. The HOA will also provide residents with transit schedules within the area and alert residents when new transit services are added or new services are charged. The HOA will also act as Travel Advisor, providing new residents and tenants with information regarding how members of households can travel in alternative ways that meet their needs. 	
Impact TRA-2: Generate Vehicle Miles Traveled in Exceedance of Thresholds for Commercial Uses.	PS	Implement MM-TRA-1 , as described above.	SU
Impact C-TRA-1: General Vehicle Miles Traveled in Exceedance of Thresholds for Residential and Commercial Uses.	PS	Implement MM-TRA-1 , as described above.	SU
3.17 Utilities and Service Systems			
Impact UTIL-1: Construction of Utilities Has the Potential to Result in Significant Impacts to the Environment.	PS	Applicable mitigation measures from other resource topics including air quality and health risks, biological resources, cultural and tribal cultural resources, geology and soils, and noise. No additional mitigation is required.	LTS

3.18 Wildfire

Implementation of the proposed project would not result in any potentially significant impacts related to wildfire.

LTS = less than significant; PS = potentially significant; SU = significant and unavoidable.

1 Introduction

1.1 Overview

Carlton Oaks Golf Course ownership and Lennar Homes, as joint project proponents, are proposing to redevelop the existing 1950s-era Carlton Oaks Country Club facility into a modern, self-sustaining destination resort with residential accessory uses. The Carlton Oaks Country Club and Resort Project (project) site that would be developed is located on approximately 165 acres and would include the following components: (1) demolition of the existing Carlton Oaks Golf Course; (2) redesign of the golf course; (3) reconstruction of the clubhouse with a new pro shop, practice area, and learning center structure; (4) a hotel and associated cottages; (5) single-family residences and residential accessory uses consisting of two residential neighborhoods with open-space areas; and (6) related on-site infrastructure. Approximately 3.5 acres consist of areas outside of the project site that would be developed with improvements associated with the project and are located either in the City of San Diego or City of Santee (off-site improvement areas). The off-site improvement areas and the project site make up the California Environmental Quality Act (CEQA) Study Area.

The residential components of the proposed project are planned as an accessory use to the golf course and the Carlton Oaks Country Club and would be constructed in the western and northern portions of the project site (Residential West and Residential North). Additionally, as part of the proposed project, trail segments would be constructed on the project site to provide a connection to the future San Diego River Trail.

In addition to the project overview provided above, this introductory chapter briefly discusses the purpose of CEQA and this Draft Environmental Impact Report (EIR), the intended uses for this Draft EIR, the scope and content of this Draft EIR, and the organization of this Draft EIR.

1.2 Purpose of the California Environmental Quality Act and the Environmental Impact Report

This Draft EIR evaluates the environmental effects of the proposed project and has been prepared in compliance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.) and the procedures for implementation of CEQA set forth in the State CEQA Guidelines (California Code of Regulations [CCR] Title 14 Section 15000 et seq.).

CEQA was enacted by the California legislature in 1970. As noted under State CEQA Guidelines Section 15002, CEQA has four basic purposes:

1. Inform governmental decision-makers and the public about the potential significant environmental effects of proposed activities.
2. Identify the ways in which environmental damage can be avoided or significantly reduced.
3. 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.
4. If significant environmental effects are involved, disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose.

An EIR is an informational document, the purpose of which is to inform members of the public and agency decision-makers of the significant environmental effects of a proposed project, identify feasible ways to reduce the significant effects of the proposed project, and describe a reasonable range of feasible alternatives to the project that would reduce one or more significant effects and still meet the proposed project's objectives. In instances where significant impacts cannot be avoided or mitigated, the proposed project may nonetheless be carried out or approved if the approving agency finds that economic, legal, social, technological, or other benefits outweigh the unavoidable significant environmental impacts. Under CEQA, an EIR is not required to include an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those existing conditions.

1.3 Intended Uses of the Environmental Impact Report

This section discusses the intended uses for this Draft EIR and includes a list of agencies that would be expected to use this Draft EIR for decision making, a list of required permits and other approvals that would be required to implement the proposed project, and an explanation of the project-level analyses contained within this EIR. Environmental review and consultation requirements under federal, state, or local laws, regulations, or policies that are in addition to CEQA are discussed in the applicable individual resource sections in Chapter 3, Environmental Analysis.

1.3.1 Agencies Expected to Use this Draft Environmental Impact Report

The City of Santee is the CEQA lead agency, as defined under State CEQA Guidelines Section 15050, because it has principal responsibility for carrying out and approving the proposed project. As the lead agency, the City of Santee also has primary responsibility for complying with CEQA. As such, the City of Santee has analyzed the environmental effects of the proposed project, the results of which are presented in this Draft EIR. The City of San Diego is a responsible agency, as defined under State CEQA Guidelines Section 15381, because a portion of the project would be within the City of San Diego's jurisdiction, and the City of San Diego is responsible for approving the applicable discretionary permits.

The City of Santee is responsible for certifying the Final EIR and approving the Findings of Fact and Statement of Overriding Considerations pursuant to State CEQA Guidelines Sections 15090–15093 prior to project approval. Table 1-1 provides a summary list of the approvals and permits that would be required.

Table 1-1. List of Required Discretionary Actions

Discretionary Action	City of Santee	City of San Diego
Certification of Final Environmental Impact Report	X	—
Adoption of Mitigation Monitoring and Reporting Program	X	—
Adoption of Findings of Fact	X	—
Adoption of Statement of Overriding Considerations	X	—
Issuance of Ministerial Construction Permits	X	X
Approval of a Conditional Use Permit	X	—
Approval of Tentative Map	X	—
Approval of Development Review Permit	X	—

Table 1-1. List of Required Discretionary Actions

Discretionary Action	City of Santee	City of San Diego
Approval of Site Development Permit	—	X
Approval of Easements	—	X
Approval of MHPA Boundary Line Adjustment or Boundary Line Correction	—	X
Responsible Agency Findings	—	X

1.4 Scope and Content of the Draft Environmental Impact Report

As the CEQA lead agency, the City of Santee is responsible for determining the scope and content of this Draft EIR, a process referred to as *scoping*. As part of the scoping process, the City of Santee considered the environmental resources present on site and in the surrounding area, and identified the probable environmental effects of the proposed project. On June 7, 2024, the City of Santee posted a Notice of Preparation (NOP) in accordance with State CEQA Guidelines Section 15082. The NOP was mailed to public agencies, organizations, and other interested individuals to solicit their comments about the scope and content of the environmental analysis. The City of Santee held a public scoping meeting on June 25, 2024, to provide an opportunity for agency staff and interested members of the public to submit written comments on the scope of the environmental issues analyzed in the EIR. The NOP and all NOP comment letters are included as Appendix A of this EIR.

The scope of this Draft EIR is based on the City of Santee's preliminary evaluation of the probable effects of the proposed project. This Draft EIR analyzes effects associated with the following resources:

- Aesthetics and Visual Resources
- Air Quality and Health Risk
- Biological Resources
- Cultural and Tribal Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise and Vibration
- Population and Housing
- Public Services
- Recreation
- Transportation and Circulation

- Utilities and Service Systems
- Wildfire

No agricultural or forestry resources occur on site; therefore, the proposed project would not have an adverse effect on these resources. Additionally, it was determined that the proposed project would have no impact associated with mineral resources (Threshold 2). Chapter 4, Other CEQA Considerations, includes a brief analysis as to why impacts on agricultural and forestry resources and mineral resources (Threshold 2) would not be significant.

It should be noted that under CEQA, an EIR is not required to include an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those existing conditions.

1.4.1 Areas of Known Controversy/Issues Raised by Agencies and the Public

Pursuant to CEQA Guidelines Section 15123(b)(2), a lead agency is required to include in the EIR areas of controversy raised by agencies and the public during the public scoping process. Several specific environmental issues were raised in the comments on the NOP. A summary of these comments and the sections where they are addressed in this EIR are provided in Table 1-2. Only comments that pertain to the environmental scope of this EIR are summarized.

Comments received during the NOP scoping period were reviewed to assist in preparing the information and analysis contained in this EIR.

Table 1-2. Summary of Notice of Preparation Comments Received

Commenter	Environmental Topic	Location Where Addressed in This EIR
State		
California Department of Fish and Wildlife Jennifer Turner, Environmental Program Manager, July 8, 2024	<p>The California Department of Fish and Wildlife (CDFW) may act as a responsible agency under CEQA and may need to exercise regulatory authority as provided by the Fish and Game Code.</p> <p>CDFW recommends that the Draft EIR include a thorough evaluation of the potential of the project to result in changes to flood risks in the San Diego River and also in tributaries entering the project site. CDFW also recommends that the Draft EIR include a thorough and complete discussion of any topographic changes proposed within the flood plain and floodway of the San Diego River.</p> <p>CDFW recommends that the City of Santee analyze alternatives that do not involve grade changes within the floodplain or floodway, do not involve changes to the channels that run through the project site, do not require armoring or stabilization to protect raised elevations from stream flows, and do not reduce the width of the floodway.</p>	Section 3.3, Biological Resources; Section 3.9, Hydrology and Water Quality; and Chapter 5, Alternatives to the Proposed Project

Table 1-2. Summary of Notice of Preparation Comments Received

Commenter	Environmental Topic	Location Where Addressed in This EIR
	<p>CDFW recommends that the City of Santee analyze alternatives that avoid impacts on stream, wetland, and riparian areas.</p> <p>CDFW recommends that the Draft EIR analyze whether the project would affect local wildlife movement that occurs throughout the entire project site. CDFW recommends the City of Santee analyze alternatives that do not reduce the width of the wildlife movement corridor.</p> <p>CDFW recommends that the Draft EIR analyze the potential of the project to indirectly affect adjacent habitats and that the City of Santee include requirements for effective buffers between development and sensitive habitats.</p> <p>CDFW recommends that the Draft EIR analyze the project's impact on floral resources, nesting habitat, and overwintering habitat for Crotch's bumble bee. Additionally, CDFW recommends that surveys within 1 year prior to vegetation removal and/or ground disturbance to determine the presence/absence of Crotch's bumble bee.</p> <p>CDFW recommends that the City of Santee require the project proponent to provide a native plant palette for the project. CDFW strongly recommends avoiding nonnative, invasive species for landscaping and restoration, particularly any species listed as <i>Moderate</i> or <i>High</i> by the California Invasive Plant Council.</p> <p>CDFW recommends that the Draft EIR include an analysis of the project's consistency with the conservation goals and objectives of the San Diego Multiple Species Conservation Program (MSCP). CDFW recommends that the City of Santee consult with CDFW, the U.S. Fish and Wildlife Service (USFWS), and the City of San Diego prior to the issuance of the Draft EIR to resolve the project's potential impacts to the Multi-Habitat Planning Area and determine the need for a boundary line adjustment.</p> <p>CDFW recommends that the Draft EIR include a complete project description, a range of feasible alternatives, an adequate biological resources assessment, and a thorough discussion of direct and indirect impacts expected to affect biological resources, with specific measures to offset such impacts. CDFW also recommends compensatory mitigation measures for the project's significant direct</p>	

Table 1-2. Summary of Notice of Preparation Comments Received

Commenter	Environmental Topic	Location Where Addressed in This EIR
	<p>and indirect impacts to sensitive and special status plants, animals, and habitats, and measures to protect the targeted habitat values in perpetuity.</p> <p>CDFW recommends that measures be taken to avoid impacts on nesting birds.</p> <p>CDFW recommends that the project proponent seek appropriate take authorization under California Endangered Species Act prior to implementing the project, if required.</p> <p>CDFW recommends prohibiting the use of translocation or transplantation as the primary mitigation strategy, or any development or conversion that would result in a reduction of wetland acreage or wetland habitat values.</p> <p>CDFW may require a scientific collecting permit and a Lake and Streambed Alteration Agreement.</p>	
California Department of Transportation, District 11 Kimberly D. Dodson, Branch Chief, July 3, 2024	<p>The California Department of Transportation (Caltrans) recommends preparation of a vehicle miles travelled-based traffic impact study, as well as a local mobility analysis. Caltrans also requests to be included in review of all submittals regarding floodplain administration.</p> <p>Caltrans recommends consideration of the 2021 <i>Regional Transportation Plan, State Route 52 Coast, Canyons, and Trails Comprehensive Multimodal Corridor Plan</i>, CAPTI: <i>Climate Action Plan for Transportation Infrastructure</i>, CTP 2050: <i>California Transportation Plan 2050</i>, and upcoming proposed projects and public transit in the area. Caltrans also recommends that compatibility concerns regarding airport obstructions and hazards to flight are considered.</p>	Section 3.8, Hazards and Hazardous Materials, and Section 3.16, Transportation and Circulation
California Native American Heritage Commission Murphy Donahue, Cultural Resources Analyst, June 10, 2024	<p>The Native American Heritage Commission (NAHC) recommends consultation with California Native American tribes under Assembly Bill 52 and Senate Bill 18.</p> <p>The NAHC provides standard recommendations for adequately assessing the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or, barring both, mitigation of project-related impacts on tribal cultural resources.</p>	Section 3.4, Cultural and Tribal Cultural Resources
Regional		
Barona Band of Mission Indians	Commenter recommends that the Draft EIR include a section on cultural resources that includes the results of a cultural resources assessment performed by a qualified archaeologist under applicable State CEQA	Section 3.4, Cultural and Tribal Cultural Resources

Table 1-2. Summary of Notice of Preparation Comments Received

Commenter	Environmental Topic	Location Where Addressed in This EIR
Art Bunce, Tribal Attorney, June 24, 2024	Guidelines and other local law. The commenter also requests a copy of the full Draft EIR with any cultural resources appendices.	
San Diego County Regional Airport Authority Ed Gowens, Senior Airport Planner, June 25, 2024	<p>The commenter states that Airport Land Use Commission (ALUC) staff review of the project site indicates that it is entirely located outside the noise contours and safety zones of the <i>Gillespie Field Airport Land Use Compatibility Plan</i> (ALUCP), and, therefore, no determination of consistency with the ALUCP is required from the San Diego County Regional Airport Authority as the ALUC.</p> <p>The commenter also states that the project would be located within the Airport Influence Area of the ALUCP and potentially be subject to project sponsor notice to and review by the Federal Aviation Administration (FAA) if their height and location attributes meet criteria for FAA notice.</p> <p>The commenter recommends that a form of notice of airport proximity and aircraft overflight be given to each new residential unit in compliance with California real estate disclosure law.</p>	Section 3.8, Hazards and Hazardous Materials
San Diego County Archaeological Society, Environmental Review Committee James W. Royale, Jr., Chairperson, June 28, 2024	The commenter requests a copy of the Draft EIR and the archaeological technical report when they become available for public review.	Section 3.4, Cultural and Tribal Cultural Resources
Padre Dam Municipal Water District Lewis Clapp, Director of Engineering, July 8, 2024	<p>The commenter requests that the Draft EIR identify the source of water for the project and consider the jurisdictional boundary between Padre Dam Municipal Water District and the City of San Diego.</p> <p>The commenter recommends that the Draft EIR consider the prior rights of Padre Dam as an easement holder and states that improvements should not interfere with Padre Dam's infrastructure. The commenter also states that improvements surrounding Padre Dam infrastructure should be avoided.</p>	Section 3.9, Hydrology and Water Quality, and Section 3.17, Utilities and Service Systems
Organizations		
San Diego River Park Foundation Rob Hustel, President and CEO, July 7, 2024	<p>The commenter recommends that the Draft EIR discuss how the proposed project will affect the terms of the City of San Diego lease with the current property owners.</p> <p>The commenter recommends that the Draft EIR consider the project's impacts on hydrology and water</p>	Section 3.3, Biological Resources; Section 3.9, Hydrology and Water Quality; Section 3.10, Land Use and Planning; Section 3.15, Recreation; and Chapter

Table 1-2. Summary of Notice of Preparation Comments Received

Commenter	Environmental Topic	Location Where Addressed in This EIR
	<p>quality, recreation, land use, and biological resources, including analysis of the planned San Diego River Trail alignment and dam failure at the El Capitan Reservoir.</p> <p>The commenter recommends that the Draft EIR include an alternative where a road does not extend from West Hills Parkway to the proposed hotel and clubhouse.</p>	5, Alternatives to the Proposed Project
Preserve Wild Santee Van Collinsworth, Director, July 1, 2024	<p>The commenter recommends that the Draft EIR include an alternative consistent with the City of Santee's <i>General Plan</i>, which eliminates housing in both Residential North and Residential West.</p> <p>The commenter recommends that the Draft EIR include an alternative that limits development to disturbed portions of the site.</p> <p>The commenter recommends that the Draft EIR include a discussion of the status of the City of Santee's <i>General Plan</i>, Protection Measure N, and the project's consistency with the <i>General Plan's Land Use Element</i> and Measure N.</p>	Section 3.10, Land Use and Planning, and Chapter 5, Alternatives to the Proposed Project
Treviso Homeowners Association Board of Directors Lisa Meyer, July 8, 2024	<p>The commenter recommends that the Draft EIR include detailed mapping of high-pressure gas lines to ensure that they are properly evaluated and that all necessary precautions are included in the Draft EIR to ensure that there is no impact on existing lines before, during, and after construction of the proposed project.</p> <p>The commenter also recommends that the Draft EIR consider the project's impacts on traffic, noise, air quality, hydrology and water quality, and public services, including mitigation for dust impacts, noise, and roadway improvements.</p>	Section 3.2, Air Quality and Health Risks; Section 3.9, Hydrology and Water Quality; Section 3.12, Noise and Vibration; Section 3.16, Transportation and Circulation; and Section 3.17, Utilities and Service Systems
Individuals		
Katherine Pittman, June 8, 2024	<p>The commenter recommends that the Draft EIR consider the project's impacts on traffic, parking, flooding, wildfire, and biological resources.</p>	Section 3.3, Biological Resources; Section 3.9, Hydrology and Water Quality; Section 3.10, Land Use and Planning; Section 3.16, Transportation and Circulation; and Section 3.18, Wildfire
Joseph Mansour June 8, 2024	<p>The commenter raised concerns regarding traffic and wildlife.</p>	Section 3.3, Biological Resources, and Section 3.16, Transportation and Circulation
Mary Jo Clark, June 8, 2024	<p>The commenter recommends that the Draft EIR consider floodplains, endangered species and wildlife,</p>	Section 3.3, Biological Resources; Section 3.9,

Table 1-2. Summary of Notice of Preparation Comments Received

Commenter	Environmental Topic	Location Where Addressed in This EIR
	roadway infrastructure, fire evacuation routes, emergency access, and changes in property values and taxes.	Hydrology and Water Quality; Section 3.14, Public Services; and Section 3.16, Transportation and Circulation
Jennifer C., June 10, 2024	The commenter recommends that the Draft EIR consider loss of freshwater marshlands and flooding.	Section 3.3, Biological Resources, and Section 3.9, Hydrology and Water Quality
Katherine Pittman, June 12, 2024	The commenter recommends that revisions are made to state that access to Residential North and the resort area would be at Carlton Oaks and Burning Tree Way, 200 feet west of Inwood Drive to Burning Tree Way.	Chapter 2, Project Description
Lori Hollis, June 12, 2024	The commenter recommends that the Draft EIR consider traffic and safety at the intersection of Carlton Oaks Drive and Leticia Drive, where the commenter describes traffic buildup in turn lanes. The commenter requests review of past accident reports.	Section 3.16, Transportation and Circulation
Scott Farrell, April Apperson-Farrell, and Loreen Mattis, June 15, 2024	The commenter recommends that the Draft EIR consider traffic, multi-use trails and separated bicycle lanes for safety and recreation, and more green space.	Section 3.15, Recreation, and Section 3.16, Transportation and Circulation
Karen Penn, June 19, 2024	The commenter recommends that the Draft EIR consider emergency vehicles authorized to use emergency access, frequency of emergency access use, resident safety during emergency access use, and the width/length of road adjustment. The commenter also recommends that the Draft EIR consider the loss of parking spaces, mitigation of vehicle and pedestrian noise, pedestrian safety on the walkway through Vista del Verde, and protection of least Bell's vireo bird habitat.	Chapter 2, Project Description; Section 3.3, Biological Resources; Section 3.12, Noise and Vibration; Section 3.14, Public Services; Section 3.15, Recreation; and Section 3.16, Transportation and Circulation
Ray and Vicki Bryan, June 20, 2024	The commenter recommends that the Draft EIR consider the project's impacts on traffic, public services, and aesthetics.	Section 3.1, Aesthetics and Visual Resources; Section 3.14, Public Services; and Section 3.16, Transportation and Circulation
Alexandria Lowry June 24, 2024	The commenter expresses concern for emergency access road control, fencing along Carlton Oaks and West Hills Parkway, and asks if a retaining wall would be installed along West Hills Parkway.	Chapter 2, Project Description; Section 3.6, Geology and Soils; Section 3.9, Hydrology and Water Quality; and Section 3.16, Transportation and Circulation

Table 1-2. Summary of Notice of Preparation Comments Received

Commenter	Environmental Topic	Location Where Addressed in This EIR
Vanina Family, June 25, 2024	The commenter recommends that the City of Santee consider the project's impacts on traffic, biological resources, air quality, noise, and recreation.	Section 3.2, Air Quality and Health Risks; Section 3.3, Biological Resources; Section 3.12, Noise and Vibration; Section 3.15, Recreation; and Section 3.16, Transportation and Circulation
Josh Rose, June 26, 2024	The commenter recommends that the Draft EIR consider the impacts of the proposed project on wetlands, cultural and historical resources, flood risk, and endangered or sensitive species, and include mitigation measures to reduce impacts on these resources. The commenter also requests that community input is considered during the EIR process.	Section 3.3, Biological Resources; Section 3.4, Cultural and Tribal Cultural Resources; and Section 3.9, Hydrology and Water Quality
Rachel Summers, June 27, 2024	The commenter recommends that the Draft EIR consider the project's impacts on traffic, hydrology and water quality, biological resources, and aesthetics.	Section 3.1, Aesthetics and Visual Resources; Section 3.3, Biological Resources; Section 3.9, Hydrology and Water Quality; and Section 3.16, Transportation and Circulation
Jeanette Salyer-Morris, June 28, 2024	The commenter recommends that the City of Santee consider the project's impacts on traffic, hydrology and water quality, and public services.	Section 3.9, Hydrology and Water Quality; Section 3.14, Public Services; and Section 3.16, Transportation and Circulation
Eid Fakhouri, June 28, 2024	The commenter states that Residential West is proposing to eliminate wetlands, riparian habitat, and the floodplain in order to build 86 multifamily detached residential units. The commenter recommends that the Draft EIR include a discussion of the project's consistency with the City of Santee's <i>General Plan</i> and federal and state laws and regulations, in addition to the City of San Diego and the San Diego Association of Governments (SANDAG). The commenter recommends that the Draft EIR include all agency responses to the potential destruction of wetlands and riparian habitat, biological-survey and wetlands-protection concerns regarding identifying and mapping species and habitat, floodplain impacts, impacts on the San Diego	Chapter 2, Project Description; Section 3.1, Aesthetics and Visual Resources; Section 3.2, Air Quality and Health Risks; Section 3.3, Biological Resources; Section 3.9, Hydrology and Water Quality; Section 3.10, Land Use and Planning; Section 3.14, Recreation; and Section 3.16, Transportation and Circulation

Table 1-2. Summary of Notice of Preparation Comments Received

Commenter	Environmental Topic	Location Where Addressed in This EIR
	<p>River and Sycamore Creek, impacts on Mission Trails Park, and compliance with the City of Santee's <i>General Plan</i>.</p> <p>The commenter recommends that the Draft EIR include a discussion of SANDAG's <i>Regional Comprehensive Plan</i> and Environmental Mitigation Program, including avoidance measures, where feasible, and mitigation strategies consistent with SANDAG's guidelines and regulatory requirements.</p> <p>The commenter recommends that the Draft EIR include a discussion of the project's impacts on wetlands and compliance with the City of San Diego's Local Coastal Program, Executive Order W-59-93, and the California Coastal Act.</p> <p>The commenter recommends that field surveys be performed when the majority of critical resources can be best evaluated in compliance with USFWS and CDFW protocols.</p> <p>The commenter recommends that the Draft EIR include a discussion of the presence or absence of narrow endemic species, including information about species covered under the MSCP, and applicable federal and state laws.</p> <p>The commenter recommends that the Draft EIR include a discussion of floodplain impacts on the San Diego River basin and Sycamore Creek, as well as the project's compliance with the Porter-Cologne Water Quality Control Act and the federal Clean Water Act.</p> <p>The commenter recommends that the Draft EIR include a discussion of the project's compliance with the Rivers and Harbors Act of 1899, the federal Fish and Wildlife Coordination Act, the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, and Executive Orders 11990 and 13186.</p> <p>The commenter recommends that the Draft EIR include a robust analysis of floodplain impacts and redirected flows and propose adequate mitigation measures to minimize these risks.</p> <p>The commenter recommends that the Draft EIR include a discussion of impacts on Mission Trails Park, including impacts on biological resources, traffic, noise, recreational amenities, and community access.</p>	

Table 1-2. Summary of Notice of Preparation Comments Received

Commenter	Environmental Topic	Location Where Addressed in This EIR
	<p>The commenter also recommends that mitigation measures are identified to protect the park's ecological integrity and recreational value.</p> <p>The commenter recommends that the Draft EIR include a discussion of the project's compliance with and implementation of Measure N, the City of Santee's <i>General Plan</i>, Protection Initiative.</p> <p>The commenter recommends that the Draft EIR include a discussion of the project's proposed landscaping and an analysis of current air flows.</p> <p>The commenter recommends that the Draft EIR include a discussion of the project's compliance with Chapter 13.08 of the City of Santee's Municipal Code.</p> <p>The commenter recommends that the Draft EIR include a discussion of the project's impacts related to visual resources, pedestrian facilities, and fugitive dust during construction and potential mitigation to reduce these impacts.</p>	
James Dell, June 29, 2024	The commenter recommends that the Draft EIR consider the project's impacts on traffic, air quality, and noise.	Section 3.2, Air Quality and Health Risks; Section 3.12, Noise and Vibration; and Section 3.16, Transportation and Circulation
Eid Fakhouri, July 1, 2024	The commenter recommends that the Draft EIR consider a range of alternatives, including removal of Residential West from project development, creation of a municipal-owned golf course through preservation of Residential North area as open space by implementing a "golf maintenance district," preservation of Residential West as open space or to San Diego River Conservancy or City of San Diego to mitigate various projects in Mission Valley, or partial development of Residential West with open space, an alternative that mitigates view impacts on existing residences that border Residential West, an alternative that mitigates noise impacts from freeway noise by installing trees, additional setbacks along Residential West to allow for ocean freeze, aesthetic improvements to the homes in Residential West to mitigate loss of views, installation of high-quality street lights at Burning Tree Way, and fair compensation for residents adjacent to the project to account for changes in property value.	Chapter 5, Alternatives to the Proposed Project
Jacquelyn G., July 1, 2024	The commenter recommends that the City of Santee consider the project's impacts on traffic, biological resources, and recreation.	Section 3.3, Biological Resources; Section 3.15, Recreation; and

Table 1-2. Summary of Notice of Preparation Comments Received

Commenter	Environmental Topic	Location Where Addressed in This EIR
		Section 3.16, Transportation and Circulation
Sandela Kuntz, July 7, 2024	The commenter recommends that the Draft EIR consider impacts on floodplains, the San Diego River Trail, Kumeyaay Lake and Campground, sensitive species and riparian habitat along the San Diego River, recreational use, noise, light, traffic, pollution, and air quality.	Section 3.1, Aesthetics and Visual Resources; Section 3.2, Air Quality and Health Risks; Section 3.3, Biological Resources; Section 3.9, Hydrology and Water Quality; Section 3.12, Noise and Vibration; Section 3.15, Recreation; and Section 3.16, Transportation and Circulation
Christine A. Tolchin, July 8, 2024	The commenter recommends that the Draft EIR consider the project's impacts on hydrology and water quality and recreation.	Section 3.9, Hydrology and Water Quality, and Section 3.15, Recreation
Mitchell M. Tsai – Law Firm, July 25, 2024	The commenter opined on flooding, building in the floodplain, biological resources including protocol surveys. The commenter also recommended use of local workforce in order to reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions.	Section 3.3, Biological Resources; Section 3.7, Greenhouse Gas Emissions; Section 3.9, Hydrology and Water Quality; and Section 3.16, Transportation and Circulation

1.5 Organization of the Draft EIR

The content and format of this Draft EIR are designed to meet the requirements of CEQA, specifically State CEQA Guidelines Article 9. Table 1-3 summarizes the organization and content of the Draft EIR.

Table 1-3. Document Organization and California Environmental Quality Act Requirements

Draft EIR Chapter	Contents
Executive Summary	Includes a brief summary of the proposed project; identifies each significant effect, including proposed mitigation measures and alternatives to reduce or avoid the effect; identifies the areas of controversy known to the lead agency, including issues raised by agencies and the public; and summarizes the issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects (State CEQA Guidelines Section 15123).

Table 1-3. Document Organization and California Environmental Quality Act Requirements

Draft EIR Chapter	Contents
Chapter 1, Introduction	Discusses the purpose of CEQA and this Draft EIR, the scope and content of this Draft EIR, the organization of this Draft EIR, and the intended uses for this Draft EIR (State CEQA Guidelines Section 15124[d]).
Chapter 2, Project Description	Contains maps of the precise location and boundaries of the proposed project and its location relative to the region, lists the proposed project's central objectives and underlying purpose, and provides a detailed description of the proposed project's characteristics (State CEQA Guidelines Sections 15124[a], [b], and [c]).
Chapter 3, Environmental Analysis	Describes the existing physical conditions for each resource area, lists the applicable laws and regulations, describes the impact assessment methodology, lists the criteria for determining whether an impact is significant, identifies significant impacts that would result from implementation of the project, and lists feasible mitigation measures that would eliminate or reduce the identified significant impacts (State CEQA Guidelines Sections 15125–15126.4). This chapter also defines the cumulative study area for each resource; identifies past, present, and reasonably foreseeable future projects with related impacts within each study area; evaluates the contribution of the proposed project to a cumulatively significant impact; and lists feasible mitigation measures that would eliminate or reduce the identified significant cumulative impacts (State CEQA Guidelines Section 15130).
Chapter 4, Other CEQA Considerations	Discusses how the proposed project could foster economic or population growth, either directly or indirectly, in the surrounding environment; describes the significant irreversible changes associated with the proposed project's implementation; and provides a brief discussion of the environmental resource impacts that were found to be not significant during preparation of this Draft EIR (State CEQA Guidelines Sections 15126.2[c] and [d], 15127, and 15128).
Chapter 5, Alternatives to the Proposed Project	Describes a reasonable range of alternatives to the proposed project, including the No Project Alternative; compares and contrasts the significant environmental impacts of alternatives to the proposed project; and identifies the environmentally superior alternative (State CEQA Guidelines Section 15126.6).
Chapter 6, List of Preparers and Agencies Consulted	Lists the individuals and agencies involved in preparing this Draft EIR (State CEQA Guidelines Section 15129).
References	Provides a comprehensive listing at the end of each chapter or section of all references cited in this Draft EIR (State CEQA Guidelines Section 15148).
Acronyms and Abbreviations	A list of acronyms and abbreviations is provided for the reader's reference immediately following the list of tables and figures in the Table of Contents.
Appendices	Presents additional background information and technical detail for several of the resource areas.

2 Project Description

2.1 Introduction

Carlton Oaks Golf Course ownership and Lennar Homes, as joint project proponents, are proposing to redevelop the existing 1950s-era Carlton Oaks Country Club facility into a modern destination resort with residential accessory uses (proposed project). The project site is located on approximately 165 acres and would include the following components: (1) demolition of the existing Carlton Oaks Golf Course; (2) redesign of the golf course; (3) reconstruction of the clubhouse with a new pro shop, practice area, and learning center structure; (4) construction of a hotel and associated cottages; (5) construction of residential accessory uses consisting of two residential neighborhoods with open space areas; and (6) construction of related on-site infrastructure. Approximately 3.5 acres outside of the project site will be developed with improvements associated with the project and are located either in the City of San Diego or City of Santee (off-site improvement areas). The off-site improvement areas and the proposed project site make up the CEQA Study Area of a total of approximately 169 acres.

The residential components would be constructed in the western and northern portions of the project site (Residential West and Residential North). Trail segments are proposed to be constructed on the project site to provide connections to planned and existing trails. There is an alternative segment for a portion of the San Diego River Trail that is proposed for City of Santee's consideration (see Section 2.4.6, Project Trail Segments, for more details).

This chapter describes the location of the project, outlines the project's objectives, provides an overview of project construction and operations, and lists the approvals that would be required.

2.2 Project Location

The project site is approximately 165 acres spanning the City of Santee and City of San Diego. The precise location of the project site is shown in Figure 2-1, Project Location Map. The project site is north of State Route (SR-) 52, where it travels in an east-west direction, south of single-family and multifamily residential development lining Carlton Oaks Drive, east of West Hills Parkway and SR-52 (where it travels in a northwest-southeast direction), and east of open space associated with the San Diego River Trail and a residential development.

Approximately 100.6 acres of the project site occurs in the City of Santee, and approximately 64.2 acres occurs in the City of San Diego (East Elliot Community). Figure 2-2, Project Vicinity, depicts the jurisdictional boundaries of the site.

Project components, including the proposed clubhouse, hotel, residential development, and the majority of the golf course, would be within the City of Santee. Project components within the City of San Diego would include a portion of the redesigned golf course (64.05 acres), driveway access to the proposed Residential West development from West Hills Parkway, widening and restriping of West Hills Parkway to provide access to the proposed residential neighborhood, a landscape easement (approximately 0.4 acres) along the widened portion of West Hills Parkway, and a portion of a graded bench (for future trail use) as well as a new Project Trail Segment in the southwestern portion of the site (see Section 2.4.6, Project Trail Segments, for more details). The CEQA Study Area consists of approximately 169 acres, including the off-site improvement areas and the project site. A portion of the off-site

improvements are located in the City of San Diego and would consist of widening and restriping of West Hills Parkway. The off-site improvements in Santee would consist of utility and access improvements (see Section 2.4.11, Off-Site Improvements, for more detail).

2.2.1 Existing General Plan Land Use and Zoning Designations

The portion of the project site within the City of Santee is designated in its General Plan as Park/Open Space (P/OS), Planned Development (PD), and Low-Medium Density Residential (R2) (City of Santee 1984). The City of San Diego's *General Plan* designates the southern part of the project site as Open Space with the zoning designation of RS-1-8 (City of San Diego 2008). The golf course is currently operating consistent with this use.

The surrounding land uses are primarily residential, municipal, commercial, and recreational uses. Surrounding land use designations primarily consist of PD, P/OS, Public, Neighborhood Commercial (NC), R2, Medium-Density Residential (R7), Medium-High Density Residential (R14), High-Density Residential (R22), and General Commercial (GC) (City of Santee 2017a).

2.2.2 Existing Conditions

The project site occurs on relatively flat to gently sloping terrain and currently consists of a 145-acre, 18-hole golf course and country club structures, including a 52-room motel-type hotel. The existing buildings comprise several structures in the northeastern area of the site (PA-2) that are clustered around a surface parking lot. The two-story hotel occurs along the southern side of the parking lot. The single-story clubhouse is west of the hotel, with a pool and patio to the north; a small parking lot on the west side of the building; and a second patio to the south, facing the golf course. In addition, four two-unit casitas (i.e., cabins) and one one-unit casita occur on the northern edge of the project site (backing up to Carlton Oaks Drive). The casitas are all single-story wooden structures, resembling houses.

The area north and northwest of the project site is dominated by relatively dense suburban development comprising one- and two-story detached single-family homes on moderately sized lots. Two-story, townhouse-style multifamily housing becomes more prevalent to the northeast, and apartment complexes and neighborhood-serving commercial centers are farther east, near the intersection of Carlton Oaks Drive and Carlton Hills Boulevard. The Vista del Verde condominiums are directly northeast of the project site. Single-family housing and mobile home parks occur south of the project site; however, given that these uses exist on the opposite side of major transportation corridors, including SR-52 and Mission Gorge Road, these uses are not visually connected to the project site.

The project site is within a wildland/urban interface. The site is statutorily designated as a Local Responsibility Area, with portions of the site classified as a Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE). However, the areas classified as Very High Fire Hazard Severity Zones are within the landscaped golf course.

Several waterways travel through the project site. Sycamore Canyon Creek crosses under Carlton Oaks Drive and merges with the San Diego River (North Channel). The San Diego River (North Channel) flows through the golf course, traveling westward through the northern portion of the golf course until it merges with the San Diego River (South Channel) near the SR-52 overpass at the western end of the golf course. In addition, runoff from Forester Creek joins the San Diego River (South Channel) along the southeasterly limits of the property. The San Diego River

(North Channel) corridor is mostly open, with lower-growing grasses, sedges, reeds, and intermittent patches of riparian trees and shrubs.

The San Diego River (South Channel) corridor travels along the southern boundary of the project site, separated from the golf course and project site by a constructed berm. The berm consists of loosely placed soil that was graded per 1995 Grading Plan G-378. The berm is approximately 10 to 12 feet tall, but in some areas has eroded to only 5 feet tall and is occasionally used as an informal recreational path. According to the ground lease between the City of San Diego and the Carlton Oaks Country Club, the southern boundary of the golf course is defined by the northern toe of the slope of the berm such that the entire structure of the berm is outside of the project site. The City of San Diego granted the Carlton Oaks Country Club a maintenance easement on the property that contains the berm so that both entities may maintain the berm, but neither has the obligation to do so. The berm ends near the western limits of the golf course, just upstream of the West Hills Parkway Bridge. No development would occur on the berm.

The project site receives runoff from the San Diego River, Sycamore Canyon Creek, and storm drain outfalls from the existing neighborhoods along the Carlton Oaks Drive and Mast Boulevard corridors. The San Diego River (North Channel) enters the site near the northeastern edge of the golf course under the existing Carlton Oaks Bridge and conveys flows westerly to the main channel of the San Diego River. The project site contains two existing public storm drain extensions. Existing drainage pipes discharge into the golf course in four locations along the northern subdivision boundary. The San Diego River (North Channel) provides drainage relief for overland flows from the majority of the golf course and the neighborhoods north of the property. Downstream of the Carlton Oaks Bridge, the presence of dense riparian vegetation overgrowth reduces and restricts the flow of water at the confluence of Sycamore Canyon Creek and San Diego River.

There are four existing irrigation wells within the golf course area. The depths of the wells are approximately 840 to 960 feet below land surface (ft. bls.) and yield approximately 200 to 250 gallons per minute (gpm). The water from these wells are currently used to fill the irrigation pond south of the country club building. Water is then pumped back out of the pond as needed to irrigate the golf course. Under existing conditions, there are approximately 132 acres of golf course turf that is irrigated with water from these wells. These four wells are a necessary part of the golf course operations and maintenance, and all four would be retained during and after construction. None of the four wells are proposed to be abandoned or capped.

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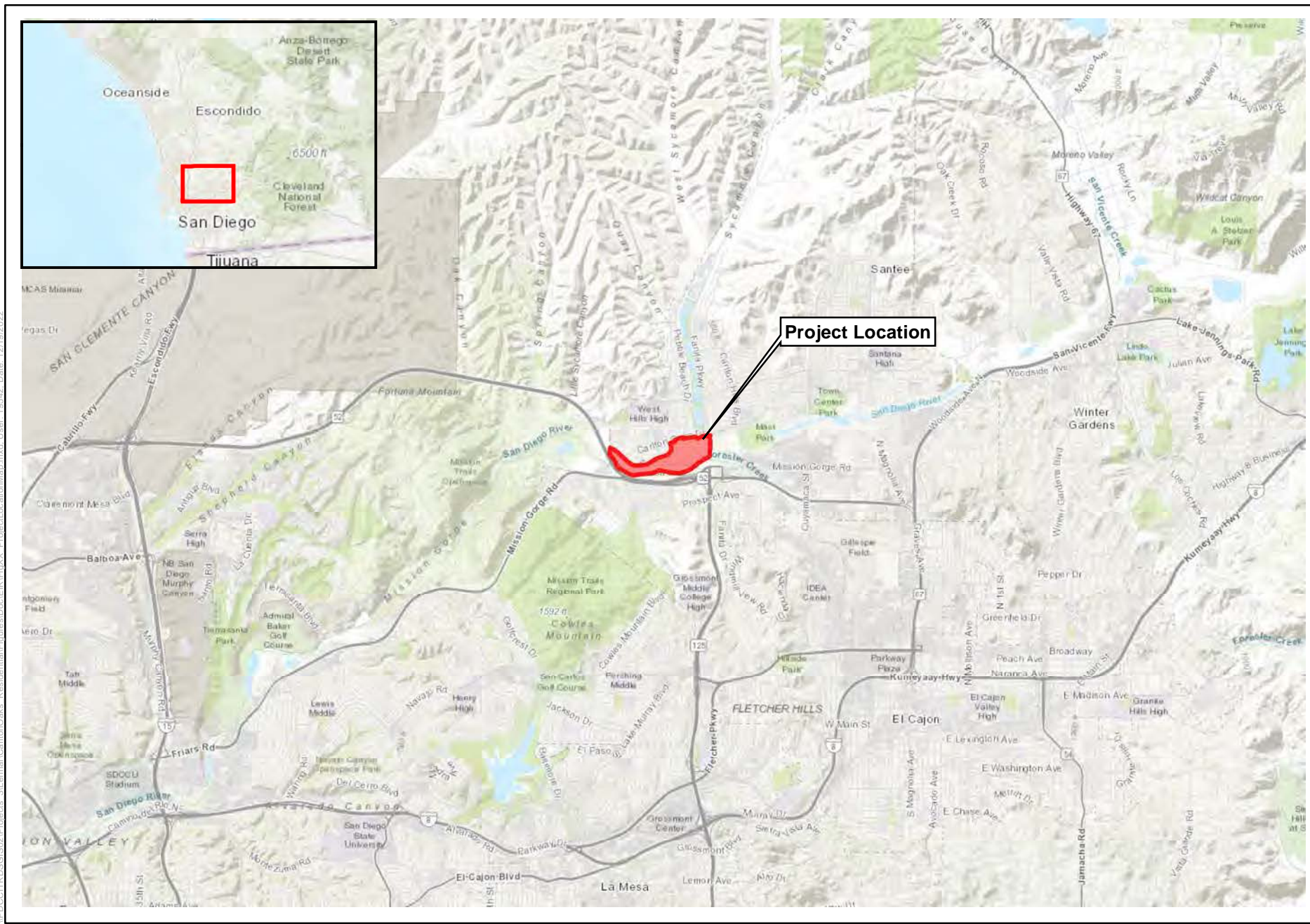
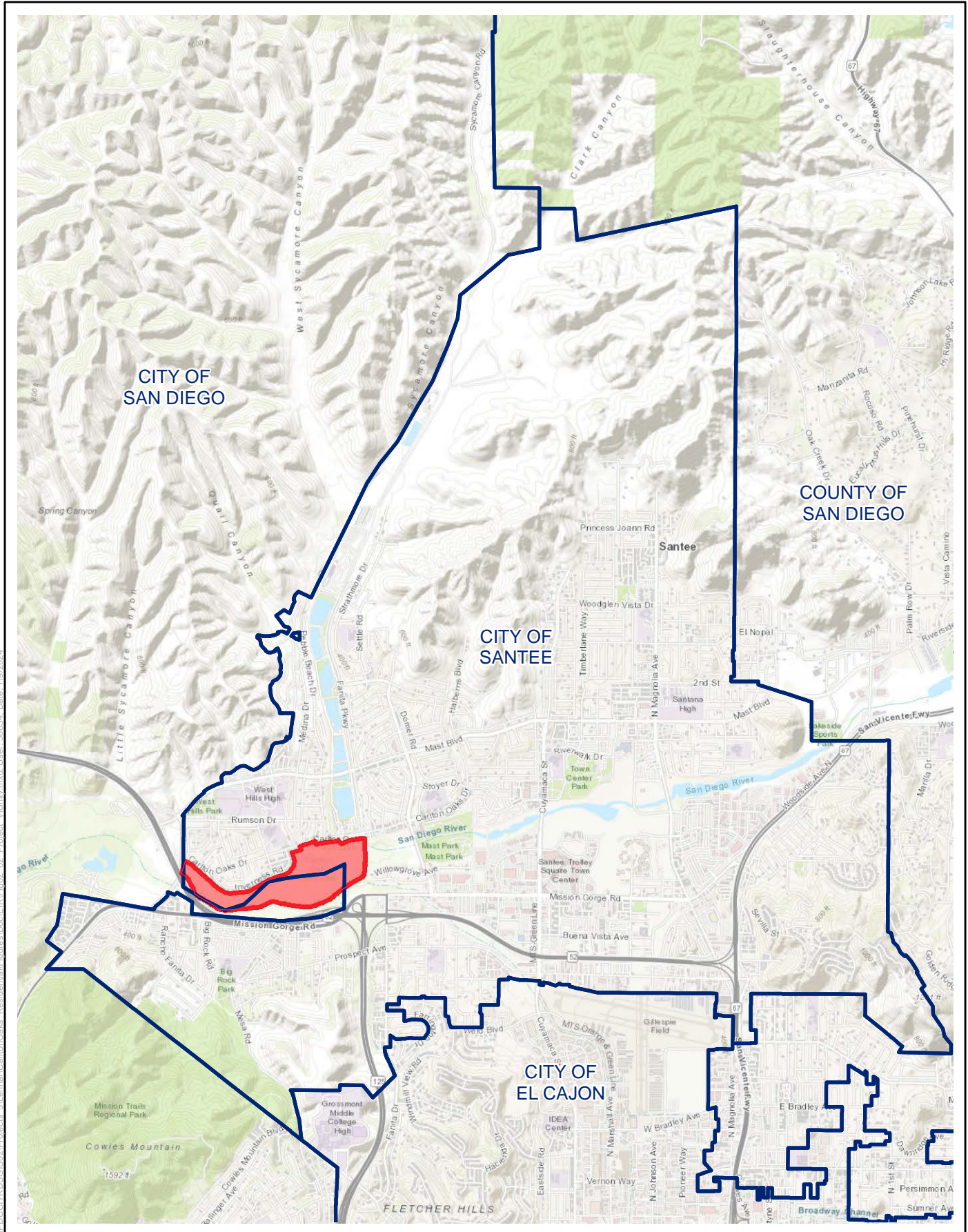


Figure 2-1
Project Location Map

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0 0.5 1
1 in = 1 mile Miles

Figure 2-2
Project Vicinity

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Beginning in 2023, soil extracted from a tunnel being bored under the golf course was transported to the existing driving range on the golf course using a small dump truck. The soil transported to the driving range was part of the continued upkeep and improvement of the existing golf course's operations. Approximately 1,000 cubic yards were moved during a year-long period. A small bulldozer was used to spread the soil and create a berm along the outer edge of the driving range, adjacent to Sycamore Canyon Creek, to aid in golf ball retention. No subsurface disturbance occurred as a result of the soil deposition.

On August 19, 2024, the City of Santee issued a Notice of Violation to the landowner of the project site. The Notice of Violation identified the transportation of the 1,000 cubic yards of dirt to the driving range without the required permit as a violation of the City of Santee's Municipal Code. The landowner was directed to remove the transported dirt from the driving range and restore the area to pre-construction conditions to the satisfaction of the City of Santee Engineer. The appropriate regulatory agencies were also informed of the violation, and they required that all restoration work be completed prior to the raptor nesting season of 2025.

Although the remedial measures are not components of the proposed project, for strictly informational purposes, the City of Santee requested that this environmental impact report (EIR) include information regarding the remedial measures that were undertaken to restore the property to its original condition. By the end of 2024, the soil and berm were removed, and the soil was transported off site. The site was returned to the contours that existed prior to the soil deposition, and site contours were verified through an engineering survey (Appendix J2, Driving Range Berm Drainage and Flood Assessment).

2.3 Project Objectives

State CEQA Guidelines Section 15124(b) requires project descriptions to contain a statement of objectives that includes the underlying purpose of the proposed project. The objectives of the proposed project are identified below:

- Provide a high-quality, mixed-use recreational resort that will enhance the experience of its users by integrating the country club and related amenities with the golf course and open space areas to provide a resort-like setting for the facilities and offer views of the golf course from the facilities.
- Develop a mixed-use, recreation-related country club resort consistently with the principles of the City of Santee *General Plan* (1984) that offers a high-quality resort setting and recreation-related amenities and uses that are consistent with other high-quality resorts in the region.
- Provide a golf course with a professionally designed layout that can be used by a broad range of players, enhance the golfers' experiences, and meet the needs of the broader tourism market.
- Provide a golf course that has improved drainage flows, reduced accumulation of surface water on the site, requires less water usage, and avoids environmentally sensitive areas, when feasible.
- Provide additional economic revenue for the City of Santee and County of San Diego through the generation of sales, transient occupancy, and property taxes by expanding the event facilities, adding residential units, and upgrading the hotel units.
- Invigorate the local economy by providing additional employment and business opportunities associated with operation of the proposed project.
- Provide high-quality housing opportunities that help satisfy regional housing needs.
- Locate the residential uses in a manner that will serve as a transition from the adjacent residential neighborhoods by providing comparable housing products.

- Foster future economic sustainability of the Carlton Oaks Country Club and Resort by providing residential accessory uses that will result in a diversification of its customers and enhance membership opportunities to activate the facilities and the site year-round.
- Design a development that is compatible with the San Diego River and includes links to existing and planned trails to the east and west of the project site.
- Provide a mixed-use recreational facility that will provide similar lifestyle experiences (i.e., residential units) as other high-quality resorts in the region.

2.4 Project Components and Features

The proposed project would consist of the following: (1) demolition of the existing, Carlton Oaks Country Club clubhouse, restaurant/bar, pro shop, hotel and hotel cottages, and surface parking lots; (2) redevelopment of the golf course; (3) construction of new residential accessory uses and resort facilities; and (4) construction of on-site and off-site infrastructure improvements associated with roads and utilities (Figure 2-3, Proposed Site Plan). The following describes the project components in more detail.

2.4.1 Golf Course Redesign

The proposed project would involve redesign of the existing 145-acre, 18-hole golf course that will accommodate the proposed residential neighborhoods, will provide an improved experience for the users of the Carlton Oaks Country Club and Resort (Figure 2-4, Golf Course Redesign). The redesigned 18-hole golf course would cover approximately 104 acres (approximately 64 acres within the City of San Diego and 40 acres within the City of Santee). To provide a more engaging golfing experience, the length of the golf course would be reduced from approximately 7,300 yards to 6,450 yards.

Under existing conditions, the golf course has approximately 132 acres of turf that is irrigated using an inefficient 30-year-old block-type irrigation system. The new course design would have approximately 66 acres of irrigated turf (i.e., a 50% reduction) that would use a modern, efficient irrigation system with individual head controls and native plantings, resulting in a decrease in water usage.

Existing manufactured ponds on the golf course would be reshaped to update existing drainage patterns to improve the drainage flow and reduce the accumulation of surface water on the site during rain events. Additionally, the stream course would be widened and enhanced in some areas to increase the functionality of the river, and surrounding vegetation would be restored. Out-of-play areas around the golf course would be planted with native grasses and smaller shrubs that require little or no maintenance. A number of riparian areas within the project site would provide an environment for native birds, small animals, and aquatic plant and animal species. These areas would be avoided and retained in their current condition. The existing maintenance facility in the eastern portion of the project site would also remain in its current location.

As amenities to the golf course, a 1,200-square-foot pro shop, 6,012-square-foot cart barn, 1,258-square-foot storage area, and a golf cart waiting area would be developed on the eastern end of the golf course, northeast of the golf resort. Golf carts would enter the golf course from an access ramp east of the cart barn/pro shop. In addition, a 1,258-square-foot golf learning center would be developed northeast of the pro shop. A shared surface parking lot would provide 293 parking spaces for users of the golf course, clubhouse, and hotel.

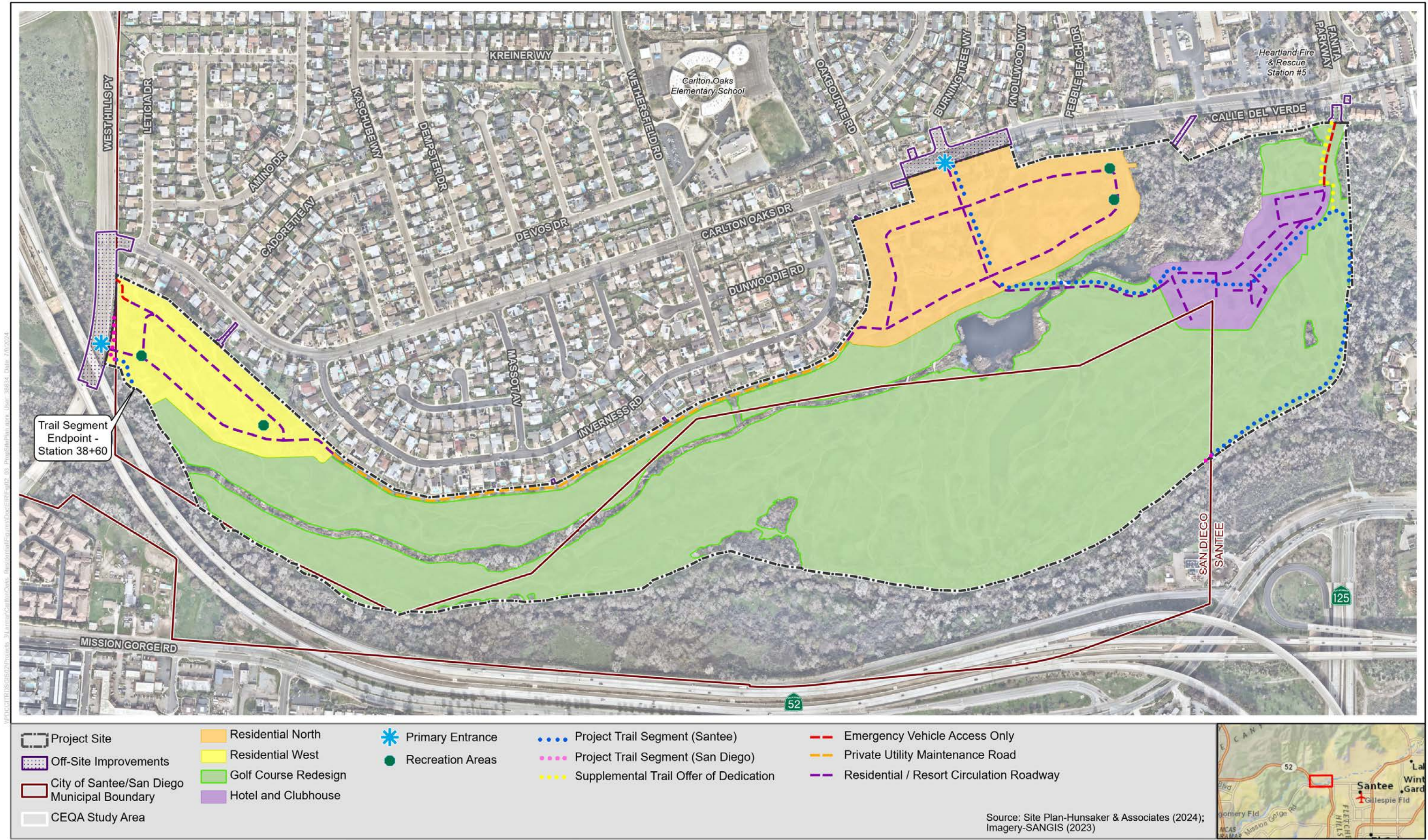


Figure 2-3
Proposed Site Plan

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Source: Cary Bickler, INC 1/2025



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Figure 2-4
Golf Course Redesign

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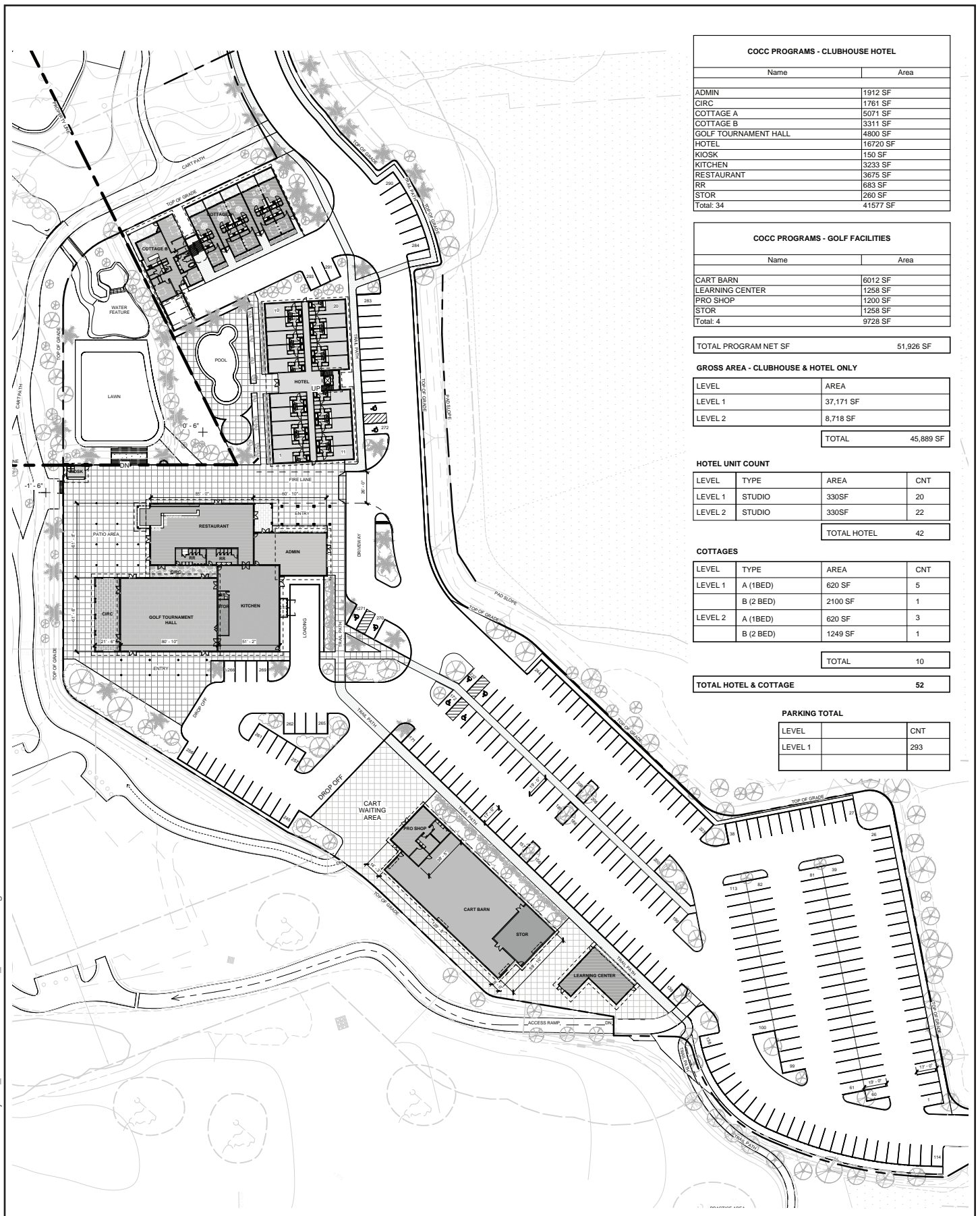
2.4.2 Carlton Oaks Country Club and Resort

The proposed project would transform the existing, outdated clubhouse and facilities into a country club and resort that would be competitive with other such establishments in the region. The resort would consist of 10 cottage-style hotel units, 42 hotel rooms, and a contemporary clubhouse. The single-story clubhouse would total approximately 16,000 square feet and contain a restaurant with a bar area, kitchen, banquet hall, administrative spaces, storage area, and restrooms. The 42-room hotel would be a separate, two-story, approximately 43-foot-tall structure. The outdoor space of the clubhouse and resort would consist of a pool and deck area, a patio, and a courtyard. The 10 cottages would be adjacent to the hotel and include individual patios. The shared surface parking lot would northeast of the clubhouse and provide 293 parking spaces for users of the golf course, clubhouse, and hotel. Parking would meet City of Santee standard parking requirements. Figure 2-5 provides a conceptual site plan for the country club and resort area, and Figure 2-6 shows the proposed elevations of the new facilities.

Weddings, golfing events, and other social gatherings currently occur inside the clubhouse and outside on the patio and lawn area of the clubhouse. Current exterior music includes acoustic-style performances of multi-piece bands, DJ performances, and other small-event-type music. Future exterior music is proposed to remain similar to the existing acoustic-style performances, and the project does not propose any increase or expansion of noise occurrences. No exterior music or amplified sound would occur after 10:00 p.m.

The country club and resort would overlook the golf course, providing panoramic views of the course and surrounding open space areas along the San Diego River corridor and enhance the experience of its users by integrating it with the golf course and open-space areas. The proposed landscaping would include water-efficient plants that emphasize colors, textures, and varieties of plants. The landscaping concept would be suitable for the Southern California climate and would enhance the buildings and outdoor spaces around the hotel. Trees would be planted throughout the site to provide shade and reduce heat generated from the parking lots. In addition, three bio-filtration basins would be installed to treat water runoff; these would occur just north of the resort parking lot adjacent to the fire access road, south of the golf cart waiting area, and north of the cottages.

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COCC PROGRAMS - CLUBHOUSE HOTEL	
Name	Area
ADMIN	1912 SF
CIRC	1761 SF
COTTAGE A	5071 SF
COTTAGE B	3311 SF
GOLF TOURNAMENT HALL	4800 SF
HOTEL	16720 SF
KIOSK	150 SF
KITCHEN	3233 SF
RESTAURANT	3675 SF
RR	683 SF
STOR	260 SF
Total: 34	41577 SF

COCC PROGRAMS - GOLF FACILITIES	
Name	Area
CART BARN	6012 SF
LEARNING CENTER	1258 SF
PRO SHOP	1200 SF
STOR	1258 SF
Total: 4	9728 SF

TOTAL PROGRAM NET SF	51,926 SF
----------------------	-----------

GROSS AREA - CLUBHOUSE & HOTEL ONLY	
LEVEL	AREA
LEVEL 1	37,171 SF
LEVEL 2	8,718 SF
TOTAL	45,889 SF

HOTEL UNIT COUNT			
LEVEL	TYPE	AREA	CNT
LEVEL 1	STUDIO	330SF	20
LEVEL 2	STUDIO	330SF	22
TOTAL HOTEL			42

COTTAGES			
LEVEL	TYPE	AREA	CNT
LEVEL 1	A (1BED)	620 SF	5
	B (2 BED)	2100 SF	1
LEVEL 2	A (1BED)	620 SF	3
	B (2 BED)	1249 SF	1
TOTAL			10

TOTAL HOTEL & COTTAGE	52
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PARKING TOTAL		
LEVEL		CNT
LEVEL 1		293

Source: Atelier5 Design, 7/15/2024.

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Source: Atelier5 Design, 5/12/2020.

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Figure 2-6
Carlton Oaks Clubhouse and Resort Elevations

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2.4.3 Residential Development

The proposed residential development would be clustered into two areas to optimize open space on the project site: Residential West (detached multifamily homes) and Residential North (detached multifamily homes and six single-family, single-story homes). Residential development would occur in the designated PD and R2 zones identified in the City of Santee's *General Plan* (City of Santee 1984) and would be developed consistent with the underlying zoning requirements.

The project would include building a total of 242 new residential units, including 86 new units in the PD zone in Residential West and 156 new units in the PD zone in Residential North. Within the R2 zone, the project would also modify driveway access to an existing home at 9225 Inwood Drive (no changes to the existing structure are proposed). In total, the project would include 243 homes in the project area, which includes the existing home with the driveway modification. The project would include a proposed density of 8.2 to 9 dwelling units per acre in the PD zone, and a density of 2.7 dwelling units per acre in the R2 zone.

Single-family and multifamily dwellings are allowable uses within the PD zone with a development review permit (City of Santee Municipal Code Section 13.19.030 A). Consistent with the Planned Development Zone, development standards would also be established through the development review permit and are provided as Appendix S, Planned Development District Standards.

As required by the City of Santee's *General Plan*, the residential development areas were designed to be accessory to the primary recreational use (golf course). Residents would be able to access recreational and commercial uses at the country club and golf course via an interconnected system of golf cart paths, a multi-use path, and sidewalks that encourage pedestrian and bicycle access to these facilities. The residential uses are designed to activate the golf course and resort during the day and night and throughout the year. The new residential areas would be an integrated component of the country club and golf course and would provide a transition from the existing residential areas adjacent to the golf course to the updated resort area. The residential development would be an integrated component of the Carlton Oaks Country Club and Golf Course that would make the facilities readily accessible to the homeowners, promoting an economically sustainable, recreation-oriented lifestyle and allowing the residents to provide year-round patronage to the golf course and resort. All new residential areas would be accessible through privately maintained internal streets, and would provide optimal vehicular, pedestrian, and emergency access (see Section 2.4.4, Project Access).

The landscaping plan for the proposed project includes enhanced open space areas in the western and eastern portions of the project site. The proposed residential development would include approximately 40,000 square feet of community recreational space for residents.

2.4.3.1 Residential West

Residential West would consist of 86 detached multifamily units on a minimum of 40- by 70-foot pads at a density of 9 dwelling units per gross acre, which is equivalent to the City's existing density ranges for the R7 zone (Figure 2-7, Residential West Site Plan). Each unit would be two stories and have a small, private yard. The detached residential units would be located within single parcels in which the underlying land would be held in common ownership (i.e., *detached multifamily*) and would be considered a condominium project, as defined in California Civil Code Section 4125. Residential designs would be a mixture of Modern Spanish, Transitional Monterey, and Transitional Farmhouse (Figure 2-8, Residential West Elevations). To improve the views from existing homes north

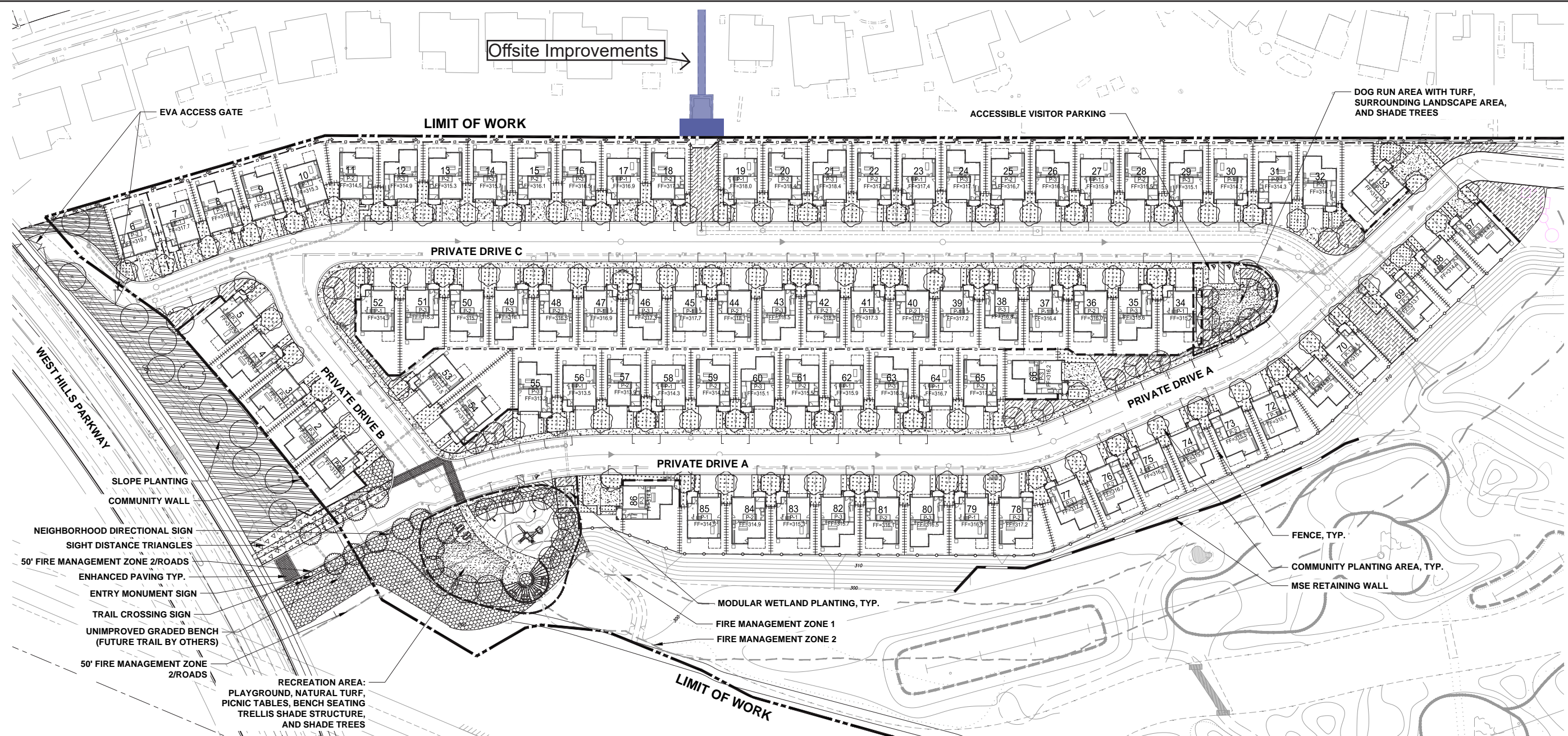
of Residential West, architectural treatments would be added to the front and back of the homes. Additionally, landscape screening would be provided at existing homes adjacent to Residential West, if desired by the property owner.

The Residential West landscape design would include installation of flowering accent trees, community shade trees, shrubs, and groundcovers for private yards, and shrubs and groundcovers for public green spaces. Other design features would include entry monument signage, stylistic paving materials, and turf block pavers (i.e., pavers that allow turf to grow around them). Low-impact-development drainage features, such as bioswales and bioretention plantings, would also be installed. Figure 2-7 depicts the proposed water quality design features that would be provided.

The proposed Residential West development would also include construction of approximately 12,500 square feet of recreational space, split between two areas. A playground, picnic tables, shade structure, and overlook area with bench seating would be located along the southwestern boundary of Residential West, and a dog park with artificial turf and shade trees would be located in the eastern portion of Residential West.

Residential West would be accessed from a private driveway that connects at West Hills Parkway, which would be widened and restriped to allow for the private access. Two private internal driveways would provide access to the homes. Each house would include a two-car garage and driveway, providing a total of 172 off-street parking spaces. In addition, the development would include 55 on-street, parallel parking spaces and 3 parking spaces that are compliant with the Americans with Disabilities Act, for a total of 230 parking spaces. There would also be emergency access (see Section 2.4.4.3, Internal Roadways).

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State of CA Model Water Efficient Landscape Ordinance (MWELO) Update Impact Comparison

Project Name: CARLTON OAKS COLF COURSE - COMMUNITY LANDSCAPE

2015 Executive Order EO B-29-15 MWELO CALCS - MAWA & ETWU PROJECT WATER USE ANALYSIS

Description	MAWA		ETWU		Hydrozones				Total Usage
					High Water Use	Moderate Water Use	Low Water Use	Very Low Water Use	
Total Landscape Area (Square Feet)	138,318.00		Hydrozone Area S.F. (HA)		8,717.00	4,665.00	124,936.00		138,318.00 SqFt
Special Landscape Area (SLA)	0.00		SLA Hydro Area		0.00	0.00	0.00	0.00	0.00 SqFt
Irrigation Efficiency (IE)	NA		Irrigation Efficiency (IE)		Irig Type = 0.75	Irig Type = 0.81	Irig Type = 0.75	Irig Type = 0.75	
Reference Evapotranspiration (Eto)	51.20		Ref ET (Eto)		51.20	51.20	51.20	51.20	
Plant Factor (PF) H=8/7, M=6/5, L=4/3, VL=2/1	NA		Plant Factor (PF)		0.8	0.5	0.2	0.1	
ET Adjustment Factor (ETAF) for non residential projects	0.45		ETAF (PF/IE)		1.07	0.62	0.27	0.13	
Conversion Factor (inches to Gallons)	0.62		Conversion Factor		0.62	0.62	0.62	0.62	
Eto x .62 x [(ETAF x Land Area) + ((1-ETAF) x SLA)]	1,975,845		Eto x .62 x (ETAF x Area)		8,248.63	16,220.60	33,316.27	0.00	49,536.87 SqFt
			Eto x .62 x (SLA Area)		261,845	514,907	1,057,592	0.00	1,834,343 Gal/Yr
Total Gallons per year	1,975,845								1,834,342.77 Gal/Yr
			Project Average ETAF	0.36					

Anticipated evapotranspiration rates for the site are based on historical averages. This data is collected from C.I.M.I.S. (California Irrigation Management Information System)

IE = All overhead spray = 0.75; Subsurface irrigation such as Bubbler and Drip = 0.81
Data from the C.I.M.I.S. Station # 150 was used.

Note: Add project name, fill in highlighted areas with appropriate SF, and confirm/ update colored irrigation efficiency (IE) and plant factor (PF) areas. As a check, project average ETAF needs to be lower than MAWA ETAF (.45).

State of CA Model Water Efficient Landscape Ordinance (MWELO) Update Impact Comparison

Project Name: CARLTON OAKS COLF COURSE - PRIVATE LANDSCAPE

2015 Executive Order EO B-29-15 MWELO CALCS - MAWA & ETWU PROJECT WATER USE ANALYSIS

Description	MAWA		ETWU		Hydrozones				Total Usage
					High Water Use	Moderate Water Use	Low Water Use	Very Low Water Use	
Total Landscape Area (Square Feet)	113,491.00		Hydrozone Area S.F. (HA)		0.00	0.00	113,491.00		113,491.00 SqFt
Special Landscape Area (SLA)	0.00		SLA Hydro Area		0.00	0.00	0.00	0.00	0.00 SqFt
Irrigation Efficiency (IE)	NA		Irrigation Efficiency (IE)		Irig Type = 0.75	Irig Type = 0.81	Irig Type = 0.75	Irig Type = 0.75	
Reference Evapotranspiration (Eto)	51.20		Ref ET (Eto)		51.20	51.20	51.20	51.20	
Plant Factor (PF) H=8/7, M=6/5, L=4/3, VL=2/1	NA		Plant Factor (PF)		0.8	0.5	0.1	0.1	
ET Adjustment Factor (ETAF) for non residential projects	0.45		ETAF (PF/IE)		1.07	0.62	0.13	0.13	
Conversion Factor (inches to Gallons)	0.62		Conversion Factor		0.62	0.62	0.62	0.62	
Eto x .62 x [(ETAF x Land Area) + ((1-ETAF) x SLA)]	1,621,196		Eto x .62 x (ETAF x Area)		8,248.63	16,220.60	15,132.13	0.00	31,352.73 SqFt
			Eto x .62 x (SLA Area)		261,845	514,907	480,354	0.00	1,257,106 Gal/Yr
Total Gallons per year	1,621,196								1,257,105.64 Gal/Yr
			Project Average ETAF	0.28					

Anticipated evapotranspiration rates for the site are based on historical averages. This data is collected from C.I.M.I.S. (California Irrigation Management Information System)

IE = All overhead spray = 0.75; Subsurface irrigation such as Bubbler and Drip = 0.81
Data from the C.I.M.I.S. Station # 150 was used.

Note: Add project name, fill in highlighted areas with appropriate SF, and confirm/ update colored irrigation efficiency (IE) and plant factor (PF) areas. As a check, project average ETAF needs to be lower than MAWA ETAF (.45).

LIMIT OF WORK
COMMUNITY RECREATION AREA

0 20 40 80
SCALE: 1" = 40'-0"

SHEET NUMBER: **LC-1.1**

PRELIMINARY
NOT FOR CONSTRUCTION

PREPARED BY:
SCHMIDT DESIGN GROUP
1300 Rosemead St., Suite G, San Diego, CA 92106
(619) 234-3432
info@schmidtgroup.com
schmidtgroup.com

DN: DB, M, JEC CK: JB PROJECT #18-203

Source: Schmidt Design Group, 1/28/2025.



Figure 2-7
Residential West Site Plan

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Source: Bassenian Lagoni Architects, 1/15/25.

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Figure 2-8
Residential West Elevations

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2.4.3.2 Residential North

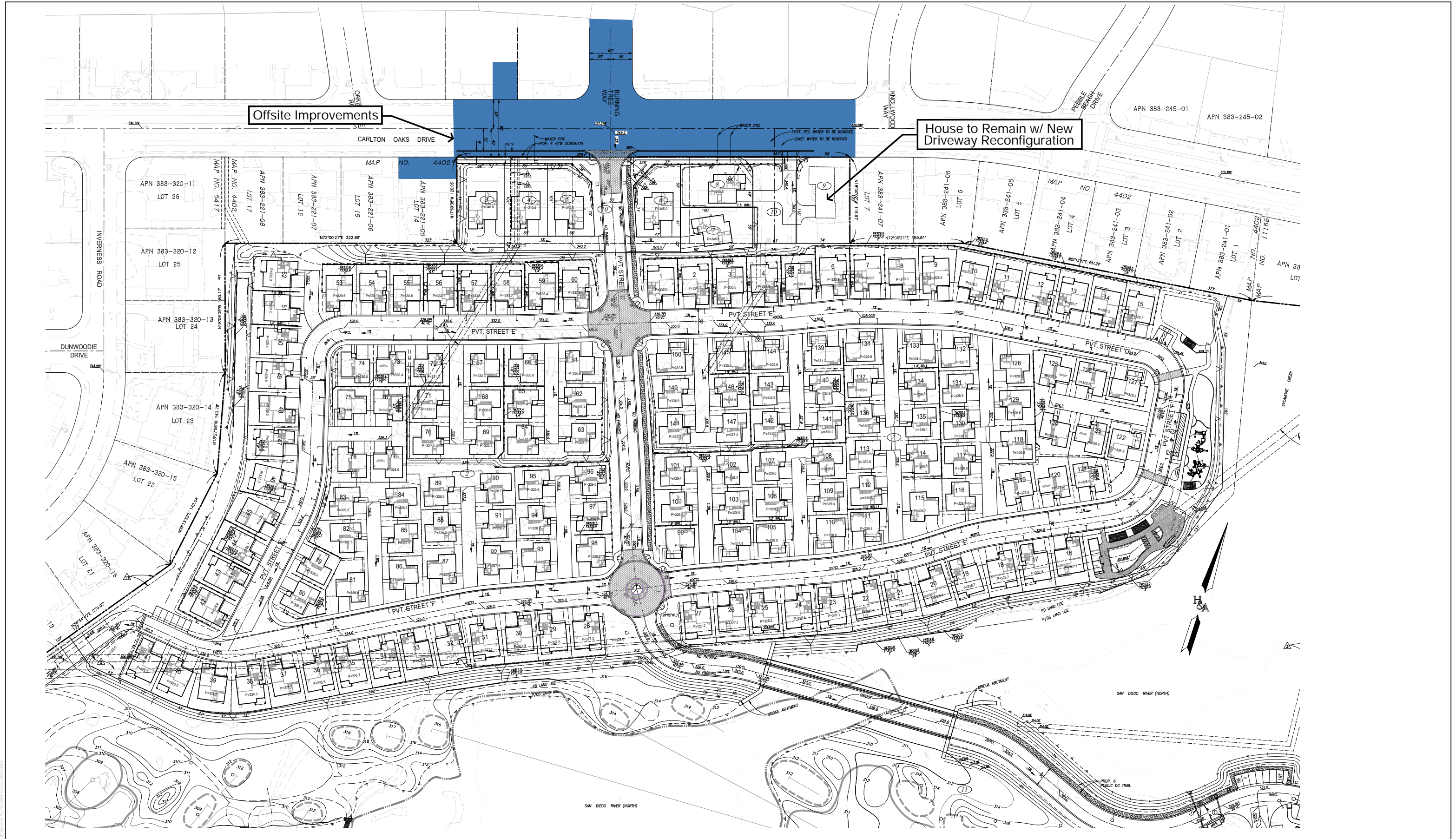
Residential North would be developed in the northern-central portion of the project site and would have a density of 8.2 dwelling units per acre within the PD zone, which is equivalent to the City's existing density range for the R7 zone, and a density of 2.7 dwelling units per acre within the R2 zone (Figure 2-9, Residential North Site Plan; Figures 2-10 and 2-11, Residential North Elevations). It would consist of 150 detached multifamily residential units and is considered a condominium project, as defined in California Civil Code Section 4125. Additionally, six single-family lots would be developed in the PD zone. In addition, one existing home at 9225 Inwood Drive has been included in the project to allow for minor driveway modifications, but no changes to the structure are proposed. In total, Residential North would consist of 156 new residential units in the PD zone and modification to one existing single-family unit in the R2 zone. The six new single-family homes along Carlton Oaks Drive and allow for single-story homes on minimum 6,000-square-foot lots with an architectural footprint of 50 by 62 feet, consistent with the existing homes on Carlton Oaks Drive (Figure 2-12, Residential North Single-Story Home Elevation). Residential North would consist of 60 detached homes with pads measuring approximately 47 by 70 feet, and 90 cluster-style, detached homes with pads measuring approximately 50 by 56 feet. Shared driveway access would be provided for clusters of four homes, maximum, each with its own attached two-car garage. Each unit would have a small, private yard but would be within a shared parcel in which the underlying land would be held in common ownership. All units except for the six single-family homes along Carlton Oaks Drive would be two stories. The proposed design for the detached homes and cluster-style detached homes would be a mixture of Modern Farmhouse, Prairie Inspired, and Spanish-Modern (Figure 2-10 and Figure 2-11).

The landscape design within this residential development would include flowering accent trees, community shade trees, accent trees, shrubs and ground cover for slopes, private yards, and public green space. Other design features would include an entry monument with stylistic paving materials, and low-impact-development drainage features, such as bioswales, bioretention treatment plantings, and turf block pavers. Figure 2-9 depicts the proposed water quality design features.

Approximately 27,400 square feet of community recreation space would be provided on the eastern boundary of Residential North and would consist of a play structure with resilient surfacing, picnic tables covered by a shade structure, a dog run area, an outdoor pool, a pool house, tables, chaise lounge chairs, and outdoor showers.

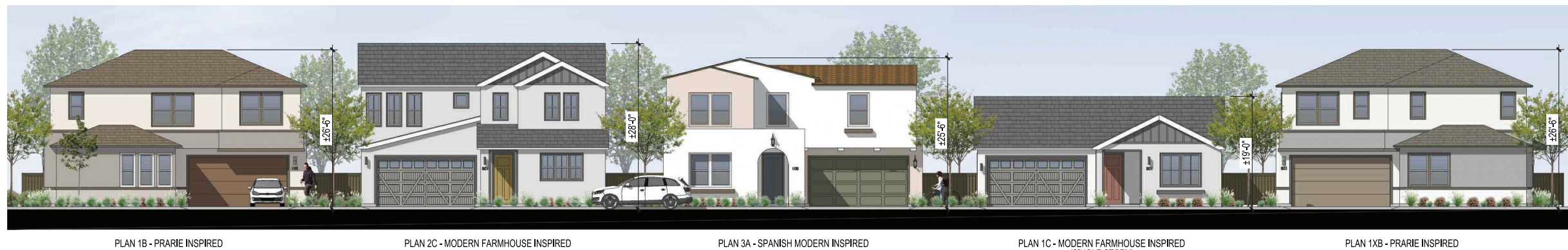
Residential North would include 405 parking spaces—314 garaged parking spaces, 6 standard guest parking spaces, 81 parallel guest parking spaces, and 4 parking spaces that are compliant with the Americans with Disabilities Act. The development would be accessed from the proposed private street (i.e., Burning Tree Way), which would extend the existing Burning Tree Way across Carlton Oaks Drive. Internal streets and a roundabout would provide access to homes and the resort facilities. The roundabout would provide traffic calming for the main entrance road. There would also be emergency access (see Section 2.4.4.3, Internal Roadways).

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SOURCE: Hunsaker 2025

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Source: ktgy Architecture + Planning, 1/16/25.

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Figure 2-10
Residential North Elevations - 50X56 Lots

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PLAN 3C - MODERN FARMHOUSE INSPIRED

PLAN 2B - PRAIRIE INSPIRED

PLAN 1A - SPANISH MODERN INSPIRED



PLAN 3B - PRAIRIE INSPIRED

PLAN 2A - SPANISH MODERN INSPIRED

PLAN 1C - MODERN FARMHOUSE INSPIRED



PLAN 3A - SPANISH MODERN INSPIRED

PLAN 2C - MODERN FARMHOUSE INSPIRED

PLAN 1B - SPANISH MODERN INSPIRED

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Source: ktgy Architecture + Planning, 1/16/25.

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Figure 2-11
Residential North Elevations - 47X70 Lots

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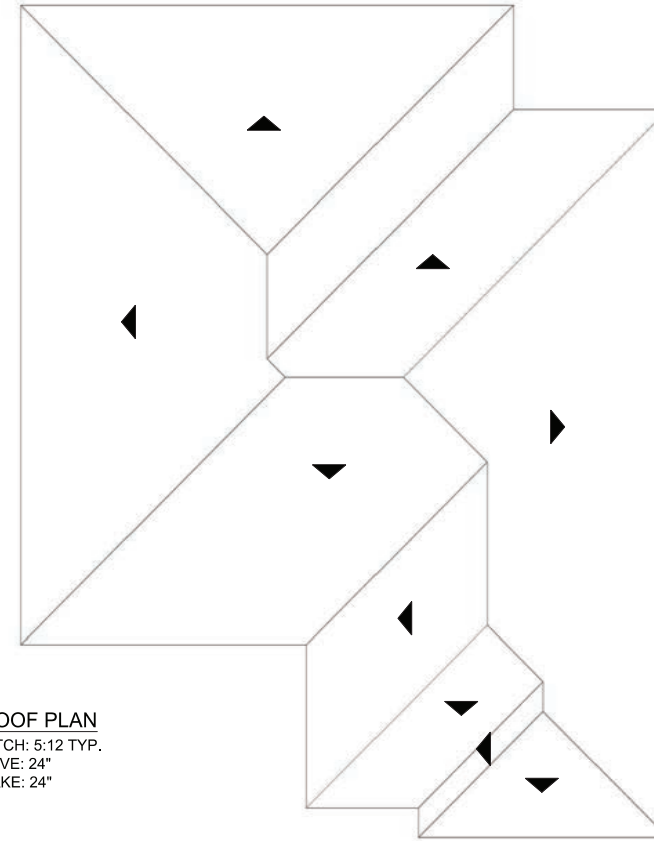
RIGHT ELEVATION



REAR ELEVATION



LEFT ELEVATION



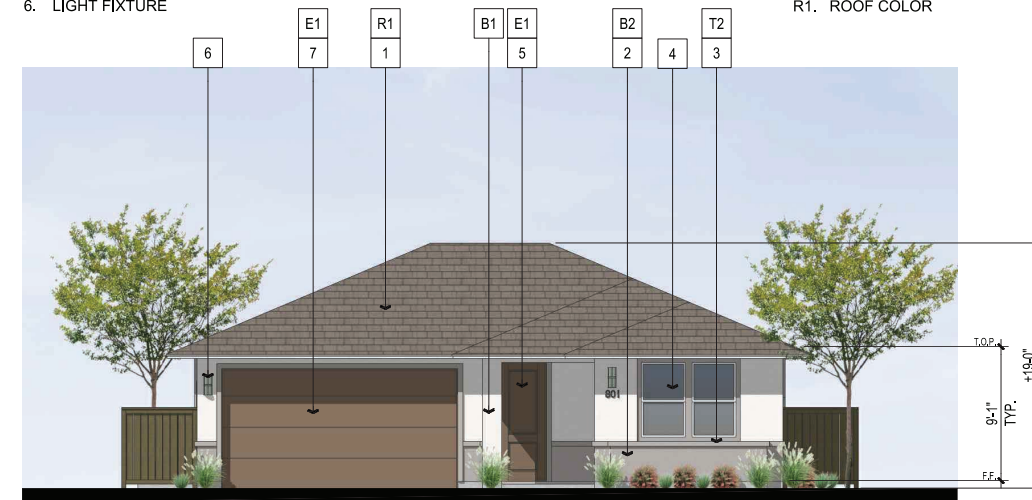
ROOF PLAN
PITCH: 5:12 TYP.
EAVE: 24"
RAKE: 24"

MATERIAL LEGEND

- | | |
|----------------------------|--------------------------|
| 1. CONCRETE FLAT TILE ROOF | 7. SECTIONAL GARAGE DOOR |
| 2. STUCCO | |
| 3. FOAM TRIM | |
| 4. RECESSED WINDOWS | |
| 5. ENTRY DOOR | |
| 6. LIGHT FIXTURE | |

COLOR SCHEME 2

- | |
|------------------------|
| B1. BODY COLOR 1 |
| B2. BODY COLOR 2 |
| T1. TRIM COLOR 1 |
| T2. TRIM COLOR 2 |
| E1. ENTRY/GARAGE COLOR |
| R1. ROOF COLOR |



FRONT ELEVATION

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2.4.4 Project Access

Access to the proposed project from the regional transportation network would be provided via West Hills Parkway, Mast Boulevard, Carlton Oaks Drive, and Carlton Hills Boulevard. These roads would either provide a direct connection to the proposed project via project drives (i.e., West Hills Parkway and Carlton Oaks Drive) or would provide a link between the proposed project and the regional transportation network (i.e., Mast Boulevard and Carlton Hills Boulevard). These roadways are described in detail below.

2.4.4.1 North-South Roadways

Carlton Hills Boulevard

Carlton Hills Boulevard provides a connection between the project site and SR-125, SR-52, and the commercial centers along Mission Gorge Road. Carlton Hills Boulevard between Mast Boulevard and Mission Gorge Road is a four-lane roadway with a raised median and a posted speed limit of 35 miles per hour (mph). Sidewalks, on-street parking, and Class II bicycle lanes are provided on both sides of Carlton Hills Boulevard. San Diego Metropolitan Transit System (MTS) Bus Route 834 runs clockwise along Carlton Hills Boulevard (southbound direction), providing transit services between the western neighborhoods of the City of Santee and the Santee Transit Center. MTS Bus Route 834 has an existing headway of 60 minutes throughout the day. The City of Santee's *General Plan – Mobility Element* (City of Santee 2017b) classifies Carlton Hills Boulevard as a four-lane major arterial.

West Hills Parkway

West Hills Parkway runs along the western edge of the project site and would provide direct access to Residential West via a single driveway. West Hills Parkway is a four-lane roadway with a striped or raised median, depending on the location, and a posted speed limit of 45 mph. Sidewalks are provided along the eastern side of West Hills Parkway and intermittently along the western side of the roadway. Parking is prohibited on both sides of the roadway. MTS Bus Route 834 runs clockwise on West Hills Parkway (northbound direction), providing transit services between the western neighborhoods of the City of Santee and the Santee Transit Center. MTS Bus Route 834 has an existing headway of 60 minutes throughout the day. The closest bus stop to the project site is at the northeastern corner of Carlton Oaks Drive and West Hills Parkway. This segment of West Hill Parkway is within the City of San Diego, but the *East Elliott Community Plan* (City of San Diego 2015) does not provide a classification for the roadway. The City of Santee's *General Plan – Mobility Element* (City of Santee 2017b) classifies West Hills Boulevard as a four-lane major arterial.

2.4.4.2 East-West Roadways

Mast Boulevard

Mast Boulevard, between the SR-52 eastbound ramps and West Hills Parkway, provides a regional connection between the proposed project and SR-52. This segment of Mast Boulevard is a four-lane roadway with a raised or striped median, depending on the location, and a posted speed limit of 40 mph. Parking is currently prohibited along this segment Mast Boulevard. Sidewalks are available on both sides of this segment, with the exception of the southern side of the roadway between the SR-52 eastbound ramps and the SR-52 westbound ramps. Class II bicycle lanes are provided in both directions. MTS Bus Route 834 runs clockwise on Mast Boulevard (eastbound direction), providing transit services

between the western neighborhoods of the City of Santee and the Santee Transit Center. MTS Bus Route 834 has an existing headway of 60 minutes throughout the day. The City of Santee's *General Plan – Mobility Element* (City of Santee 2017b) classifies Mast Boulevard as a four-lane major arterial east of the SR-52 ramps. The *East Elliott Community Plan* (City of San Diego 2015) does not identify a classification for the portions of Mast Boulevard that are within the City of San Diego.

Carlton Oaks Drive

Carlton Oaks Drive would provide direct access to the project via a single driveway at the Burning Tree Way intersection. Along the proposed project frontage between West Hills Parkway and Fanita Parkway, Carlton Oaks Drive is a two-lane roadway with a continuous left-turn lane and a 35 mph posted speed limit. Sidewalks and Class II bicycle lanes are available on both sides of Carlton Oaks Drive. No transit routes or services are currently available along Carlton Oaks Drive. The City of Santee's *General Plan – Mobility Element* (City of Santee 2017b) classifies Carlton Oaks Drive as a two-lane collector with two-way left-turn lane.

2.4.4.3 Internal Roadways

The street types and access roads proposed for the project are depicted in Figure 2-13, Project Access. The resort and Residential North would be accessed from Carlton Oaks Drive at the intersection of Burning Tree Way, approximately 200 feet west of the existing hotel access road (Inwood Drive). Inwood Drive would be closed and replaced with a curb and sidewalk. Additionally, six existing driveway aprons along the project frontage would be closed and replaced with curbs and landscaping.

Access to Residential West would be provided via a private driveway from West Hills Parkway, a public road within the City of San Diego's jurisdiction. An access easement would be required from the City of the San Diego across vacant, previously disturbed, City of San Diego Public Utilities Department-owned lands to gain access to the site. The proposed easements would allow private and emergency access and other improvements for the project.

Access to the golf course and resort would be via the same access as Residential North (i.e., at Burning Tree Way). After traveling along the main entrance to the Residential North community, the private drive would travel south across a new steel bridge over the San Diego River (North Channel). The bridge would connect the hotel and resort area to Residential North and Carlton Oaks Drive. It would be approximately 265 feet long and would accommodate two travel lanes (30 feet in width) and a multi-use trail (6 feet in width), for a total width of 36 feet. The structure would be steel truss supported on concrete abutments at its northern and southern extents, and would be able to withstand fires to support safe and efficient emergency evacuation from the project site. The area under the bridge would vary from 5 to 12 feet tall, which would be tall enough to accommodate wildlife crossings within the riparian zone and would also accommodate 100-year flood flows. The slopes at the ends of the bridge would be protected by erosion-control measures, such as rock slope protection, to protect against scour during storm events, and would also have 50-foot-wide fuel modification zones. As part of maintenance of the golf course, the golf course operator would be responsible for brush management and defensible space under the bridge and extending outward from the bridge to meet City of Santee defensible space requirements. Given the lack of proposed vegetation around the bridge and its construction with steel and fire-resistant materials, the bridge would not be threatened by radiant heat exposure or embers cast from a nearby wildfire event.

To provide vehicular access to the golf course while the new bridge is under construction, a temporary rail-car crossing would be placed at an existing golf cart path crossing west of the new bridge location. The temporary rail-car crossing would be replaced with a permanent golf cart path crossing once bridge construction is complete.

Road Standards

The proposed internal roadways would be built according to the currently adopted *Public Works Standards for Local Streets* (City of Santee 1982) as adopted by Santee City Council on October 25, 1982 by Resolution No. 113-82. The City's Public Works Standards allow for Alternative Standards subject to the discretion of the City engineer. The street design criteria set forth in the City of Santee *Public Works Standards for Local Streets* (City of Santee 1982) would apply to Drives A–F as shown on Figure 2-13 and 20-foot drives within the project site, except for the following Alternative Standards that apply to Drives A–F (see also Appendix S, Planned Development District Standards):

- **Design Speed:** 10 mph
- **Curb-to-Curb Distance:** 20- to 36-foot locations, as shown on the project Tentative Map
- **Minimum Horizontal Radius:** 41 feet
- **Horizontal Alignment:** As shown on the project Tentative Map
- **Minimum Tangent Between Reversing Curves:** As shown on the project Tentative Map
- **Minimum Curb Line Radius:** 28 feet
- **Curbs:** 6-inch curb, 4-inch curb, and rolled curb, as shown on the project Tentative Map
- **Cross Gutters:** 6-foot minimum width
- **Sidewalks:** One side of the street; no sidewalks for 20-foot drives

Fire Code Standards

The project's internal drives (including the bridge) would also comply with applicable portions of the City of Santee–adopted version of the 2022 California Building Code, Chapter 7A; 2022 California Fire Code, Chapter 49; 2019 California Referenced Standards Code, Chapter 1-7A; and 2022 California Residential Code, Section R327, as adopted by the City of Santee. The proposed internal roadways would be unobstructed and include adequate parking, turning radius, grade maximums, and roadside fuel-modification zones (FMZs). All interior residential streets would be designed to accommodate a minimum 77,000-pound fire truck. Vehicular gates for the project would be equipped with vehicle access devices and key switches so that emergency vehicles can override private access gates. All gates would also have a manual-release device or other means to open the gate in the event of power failure. All project roads (including the bridge) would also include at minimum a 50-foot FMZ, which would have specific plant restrictions and maintenance requirements, as detailed in the FPP (Appendix R1).

All internal roadways would be a minimum of 26 feet wide, with the exception of the private streets that provide direct vehicular access to each of the cluster units of four units or fewer. These private cul-de-sac roads would be 20 feet wide, as allowed by the exceptions to CFC Section 503.2.1, which states the following:

Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6,096 mm), exclusive of shoulders, except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches (4,115 mm).

The City of Santee Fire Chief has determined that the 20-foot standards, as set forth in the Development Standards for access to the cluster of four units or fewer, would not impair or impede adequate emergency fire department access to the project site. The proposed project would also provide emergency access that meets current City requirements for the proposed development.

Through project design, internal streets would be accessible for emergency response vehicles. On-street parking on both sides of the street would only be allowed when there is at least 36 feet of paved-road width. On-street parking on one side of the street would be allowed when there is at least 30 feet of paved-road width. No building elements, balconies, drains, projections, or any other object would encroach into this clear space. Fire lanes would be identified with red-painted curbs with white-stenciled letters stating “NO PARKING – FIRE LANE” every 30 feet along all portions of the fire lane. In addition, signs would provide language identifying the contracted towing company and its phone number, enabling enforcement of the no-parking areas. Parking would meet City of Santee standard parking requirements.

Emergency Access

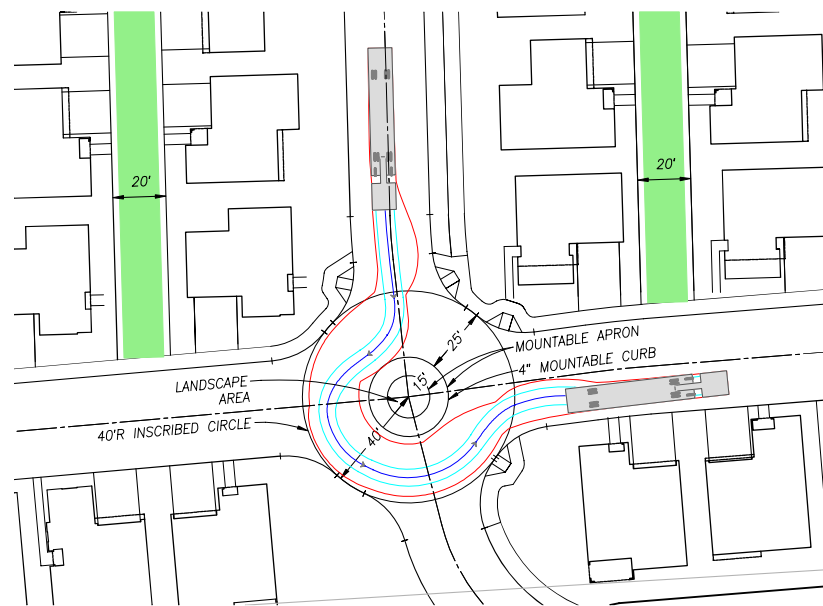
Two points of primary access for emergency response and evacuation would be provided: Carlton Oaks Drive to the north and West Hills Parkway to the west. These emergency access roadways would be in addition to the primary residential access roads, which could also be used for emergency vehicle access. Emergency access would comply with California Fire Code and City of Santee requirements.

Emergency access would be provided for Residential North and the golf course/resort via a 26-foot-wide private roadway through the existing Vista del Verde condominiums, located in the northeastern corner of the project site. This emergency access road would comply with the City of Santee Fire Department (SFD) requirements, would be for the proposed project only, and would not be open to the public. A new fence with an emergency access gate that complies with the California Fire Code would be erected between the existing adjacent condominium complex and the project site. Vehicular gates would be equipped with vehicle access devices and key switches so that emergency vehicles can override private access gates. All gates would also have a manual release device or other means to open the gate in the event of a power failure.

Emergency access to Residential West would be provided via an extension of Private Drive “C” westerly to West Hills Parkway. West Hills Parkway would be widened within the existing right-of-way (ROW) from Carlton Oaks Drive, approximately 700 feet south of the existing bridge, to provide a dedicated left-turn lane into Residential West. Emergency access would also be provided to Residential West via an extension of a private drive to West Hills Parkway, which would be 26 feet wide with curb and gutter and asphalt concrete pavement and base, with grades, horizontal alignment, and turnarounds that meet the City of Santee’s Fire requirements. This emergency access point would be gated and would not be open to the public except during times of emergency.

The project would also provide a private utility/maintenance road between Residential West and Residential North that would also serve as a pedestrian/golf cart passageway connecting Residential West to the resort. This roadway would not be considered a fire apparatus access road, but would be built to California Fire Code requirements and could be used as an emergency evacuation route, if needed.

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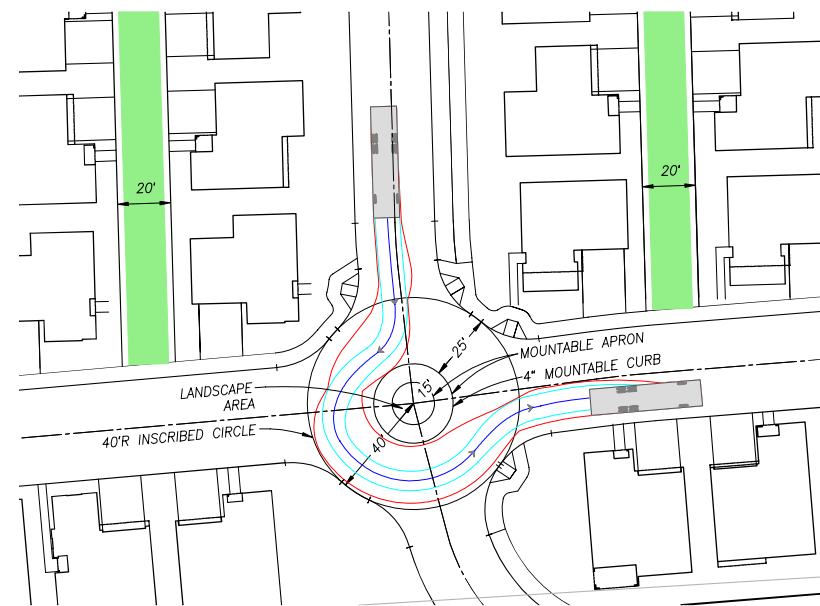
AUTOTURN DETAILS 100' TRACTOR DRAWN AERIAL

TRACTOR:

STEERING LOCK ANGLE:	45.0°
LOCK TO LOCK TIME:	6 SEC.
WIDTH:	108 IN.
AXLE TRACK:	82.92 IN.
WHEELBASE:	164 IN.
FRONT OVERHANG:	76.0 IN.
PIN LOCATION:	REAR AXLE

TILLER (REAR STEERABLE):

STEERING LOCK ANGLE:	45.0°
LOCK TO LOCK TIME:	6 SEC.
WIDTH:	108 IN.
AXLE TRACK:	82.92 IN.
WHEELBASE (FROM PIN):	372.0 IN.
REAR OVERHANG:	120.0 IN.
PIN OVERHANG:	60.0 IN.



AUTOTURN DETAILS 42' FIRE TRUCK

STEERING LOCK ANGLE:	45.0°
LOCK TO LOCK TIME:	6 SEC.
WIDTH:	118.0 IN.
AXLE TRACK:	111.0 IN.
WHEELBASE:	250.0 IN.
FRONT OVERHANG:	85.0 IN.

100' TRACTOR DRAWN AERIAL ROUNDBOUT TURN MOVEMENT

SCALE: 1"=30'

42' FIRE TRUCK ROUNDBOUT TURN MOVEMENT

SCALE: 1"=30'

LEGEND

- PATH
- FRONT TIRES
- VEHICLE BODY



FIRE ACCESS PLAN

NOT TO SCALE

Source: Hunsaker & Associates, 2/12/2024.

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Figure 2-13
Project Access

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2.4.5 Utilities

Electricity and Natural Gas

San Diego Gas and Electric (SDG&E) would provide electricity and natural gas service to the proposed project. These utilities would be extended to the project site from existing local distribution systems in the region. The existing east-west SDG&E electrical transmission easement on the project site would not be altered as part of the proposed project. New electricity and natural gas facilities would be installed on the project site in joint utility trenches that would be located in public ROWs, as required by the City of Santee. In conjunction with electricity and natural gas facilities, telephone, cable television, and internet facilities would be installed in the joint utility trenches.

The project would require installation of four new utility poles, which would be up to approximately 45 to 55 feet in height. The poles would be placed in the off-site improvement area north of the project site. Two utility poles would be placed within the public ROW on Carlton Oaks Drive, and one utility pole would be placed in the public ROW on Burning Tree Way. For the fourth pole, an existing stub pole and anchor would be removed from the ROW in front of 8726 Carlton Oaks Drive and a new utility pole would be placed on the southeastern portion of the driveway. Another option may be considered for the fourth pole to re-feed the home at 8726 Carlton Oaks Drive via a trench from the converted underground system on the south side of Carlton Oaks Drive to the southeast corner of the home; a trench and conduit would then be placed up the driveway to the easterly side of the house to tie into the existing weather head on the roof of the home. Telecommunication and cable services would require conduit/cable running upward on the outside of the exterior wall to maintain the overheard points of connection to the home. In the off-site improvement area, the existing SDG&E cable serving 8713 Carlton Oaks Drive would be removed and refed from a transformer on Oakbourne Road to the same location at the residence.

Water

The proposed project would receive water from the Padre Dam Municipal Water District (PDMWD) and would provide water service via two private water systems. One private system would deliver domestic water, and the second private water system would provide water for fire protection. One looped private fire protection system would serve the country club and resort, as well as the two residential areas. A public water line would be extended from an existing water main in Carlton Oaks Drive, down to West Hills Parkway, and would be continued as a private main within the project site.

Sewer

The proposed project would receive sewer service from the PDMWD. A private pump station and sewer system would be installed to pump sewage along the northern boundary of the proposed golf course to an existing sewer line, which is north of the existing golf course, south of the existing residential development, and in between the proposed Residential West and Residential North sites.

Residential West would be served by a private 8-inch-diameter sewer main connected to a private pump station. The pump station would pump sewage along the northern boundary of the proposed golf course to the east, and connect to the existing 15-inch trunk main, located north of the existing golf course, south of the existing residential development, and in between the proposed sites for Residential West and Residential North. The lift station would have emergency power generation, emergency sewer storage, emergency force-main connections, and odor-control equipment, including a chemical scrubber at the wet well (with provisions for adding a more aggressive odor-control system, if necessary). The emergency power generator would be mounted on an exterior concrete pad to provide

backup power if commercial power were to go out. The emergency power generator would have a sound-attenuated, weatherproof enclosure.

Construction of the Residential North property would also involve relocation of the existing 15-inch-diameter gravity sewer into the southern private drive.

The sewer collection system for Residential North would be a private sewer system consisting of 4- and 8-inch-diameter collection lines flowing to an existing, public 15-inch-diameter gravity sewer line. The clubhouse and resort would be served by a private, 8-inch-diameter gravity sewer main, which would connect to an existing 24-inch-diameter public main that bisects the resort area.

No off-site sewer system improvements would be needed for the proposed project.

Storm Drainage

The proposed project would generally maintain existing drainage patterns. Site drainage would be directed on site via overland flow, surface swales, curbs and gutters, and the private storm drain system. The private storm drains would collect runoff and convey it to proposed proprietary biofiltration units for treatment prior to discharging into the golf course and the Sycamore Canyon Creek, which connects to the San Diego River.

The project would ensure that post-project peak flow rates do not exceed pre-project peak flow rates to the San Diego River.

An existing 72-inch storm drain that discharges into an existing artificial pond would be rerouted to a bypass storm drain pipe that runs parallel to an on-site storm drain (i.e., north to south) through the residential developments. This would then directly discharge into the on-site San Diego River.

The project will not substantially increase the rate or amount of surface runoff, and the runoff generated will not exceed the capacity of the existing storm drain system.

2.4.6 Project Trail Segments

The San Diego River Trail is a regional Class I multi-use path that runs along the San Diego River and connects the Lakeside Baseball Fields to the western terminus of the City of Santee. Currently there is a gap in the trail between the intersection of Mast Boulevard/SR-52 eastbound ramps and the eastern proposed project boundary. The San Diego Association of Governments (SANDAG) has developed a plan to complete this portion of the San Diego River Trail by constructing it along the southern edge of the project site. A Mitigated Negative Declaration was adopted on June 16, 2017 (SANDAG 2017) and the bicycle way is currently in the engineering design phase; a construction schedule has yet to be set. The SANDAG segment would be funded through Transnet, the regional half-cent sales tax for transportation administered by SANDAG, although construction funds have not yet been identified. The segment of the San Diego River Trail that runs along the project boundary is not part of the proposed project, but the project applicant would continue to work with the City of Santee, City of San Diego, and SANDAG to ensure that the proposed project's design would not impede implementation of the trail.

As part of the proposed project, a multipurpose public trail would be provided on the northern side of the San Diego River, linking with existing and planned trails east and west of the site (termed the Project Trail Segment herein) (Figure 2-3). A portion of the Project Trail Segment on the eastern side of the project site would begin at the entrance

of Residential North at Carlton Oaks Drive, traverse through the resort and along the southeastern border of the project site, and end slightly west of the jurisdictional line between the City of Santee and the City of San Diego (Figure 2-3). This portion of the trail would vary in width from 6 to 10 feet and would be a decomposed granite path (Figure 2-14, Proposed Trail Segment Widths). Safety fencing, approximately 10 feet tall, would be constructed along the Project Trail Segment adjacent to the golf course. Additionally, this portion of the trail would link to the existing Mast Park West Trail and to the future planned trail known as the Carlton Oaks Golf Course Segment (SANDAG 2017). Figure 2-15 shows a portion of the Project Trail Segment on the northern side of the bridge looking east at the resort.

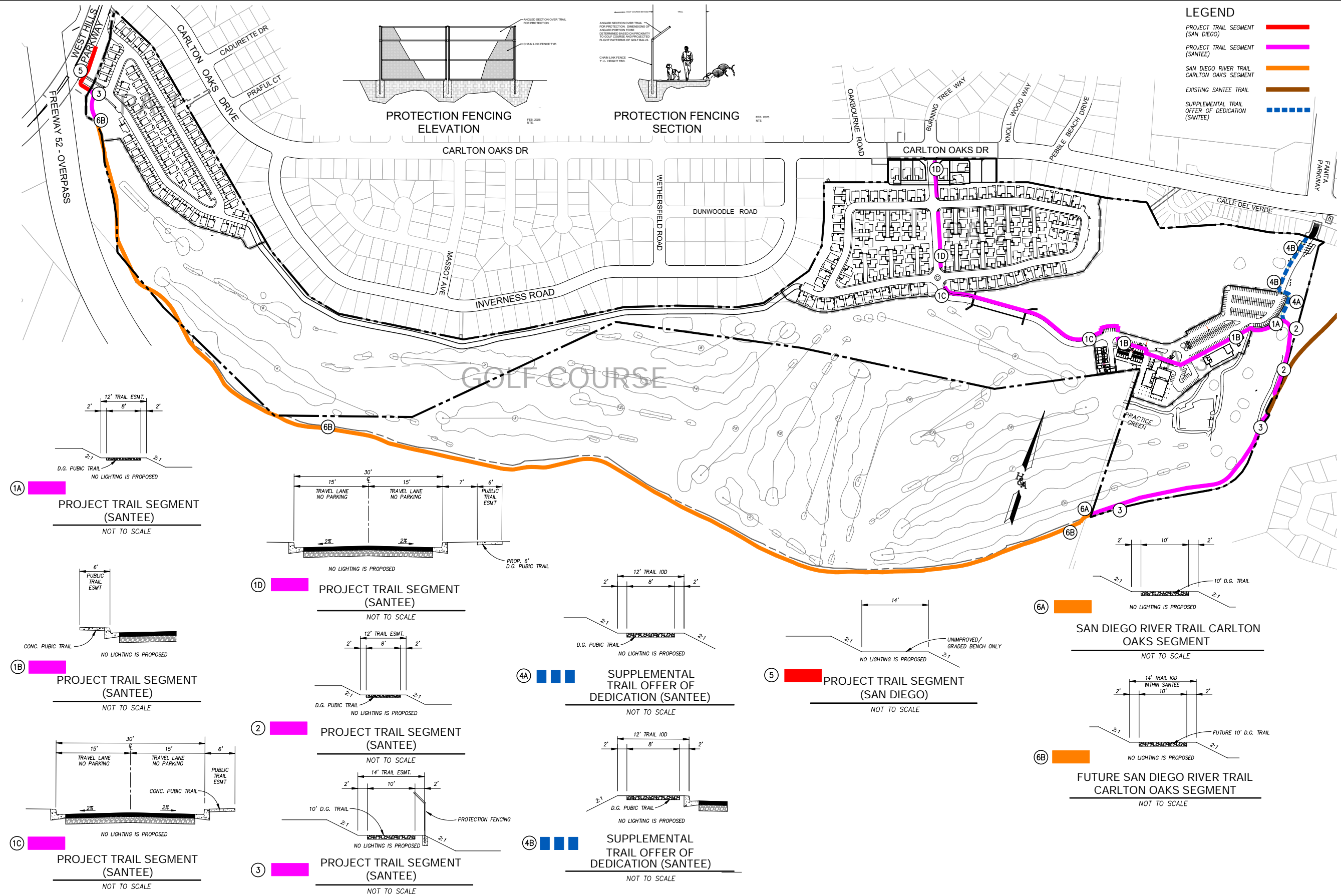
A portion of the Project Trail Segment on the western side of the project site would be constructed beginning at the City of Santee's jurisdictional line and ending at the property line (Station 38+60, shown in Figure 2-3). This portion of the trail would be 10 feet wide and consist of decomposed granite. Safety fencing would be constructed along the Project Trail Segment adjacent to the golf course. This portion of the trail would link to the future planned trail known as the Carlton Oaks Golf Course Segment. In addition, the project applicant will also provide an Irrevocable Offer of Dedication for portions of the Carlton Oaks Golf Course Segment that are located within the project site but that are not being constructed by the project applicant because these segments would not be connected to any trail and would therefore not be accessible. These will be provided to the City on the project's subdivision map.

Along the Residential West boundary, a 14-foot-long graded bench (located within the Carlton Oaks Golf Course Segment) would be provided within the easement areas that the City of San Diego would grant to the applicant as part of this project.

As an alternative to the trail alignment currently proposed through Residential North and the resort area, a supplemental trail Offer of Dedication is shown on the project site plan, should the City of Santee request this supplemental trail alignment instead. The supplemental trail Offer of Dedication is for a trail that would be 12 feet wide and start from an area east of the resort parking lot to the property line of the Vista del Verde community (Figure 2-3). The supplemental trail would be within the project development footprint analyzed in this EIR. The applicant is not proposing to construct this trail segment as part of the project, and this segment is only an alternative to the proposed Project Trail Segment located through the resort.

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Source: Hunsaker & Associates San Diego, Inc., 1/30/2025.



Figure 2-14
Proposed Trail Segment Widths

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Source: Cary Bickler, INC 10/2024

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Figure 2-15
Photo Simulation of the Proposed Steel Bridge Located Over the San Diego River Including a Segment of the Proposed Trail System

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2.4.7 100-Year Floodway Improvements

The project site is within the regulatory limits of the San Diego River (floodplain and floodway) and receives runoff from the Sycamore Canyon Creek (Santee Lakes) channel, the San Diego River (North Channel), and several storm drain outfalls from existing developments along the Carlton Oaks and Mast Boulevard roadway corridors. In addition, runoff from Forester Creek joins the San Diego River (South Channel) along the southeasterly limits of the property.

The proposed grading for the clubhouse, hotel, and golf course would occur within the regulatory floodway. Development associated with the proposed project would include elevating the grade of the clubhouse and hotel area above the floodplain. The grading for portions of the residential development areas would be within the existing floodplain limits. A small portion of the Residential North development encroaches into the existing floodplain. A Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR) would be processed through the Federal Emergency Management Agency to revise the flood mapping at the project site due to the proposed alteration of the floodway. A CLOMR would be required to be approved by the Federal Emergency Management Agency, the City of Santee, and the City of San Diego prior to the issuance of a grading permit for the project. The CLOMR would demonstrate that, built as proposed, the project would meet or exceed minimum local and federal regulations regarding structures within a floodplain and floodway.

2.4.8 Lighting and Signage

New non-residential lighting would be installed for signage, commercial accents, wayfinding, and security. Pedestrian areas such as pathways and entryways into the project site would be well-lit for safety and security. The lighting for Residential West and Residential North would be decorative and employ light-emitting diode (LED) technology. The Correlated Color Temperature would be a warm light at 3000 Kelvin color temperature. The lights would have an up-light rating of zero; thus, no light would extend above the light fixture housing. The definition for this type of lighting per the Illuminating Engineering Society of North America is described as “full cutoff” (Hilton 2024).

The mounting height of the light poles along the roadways within Residential West and Residential North would not exceed 18 feet, or exceed 12 feet along the access road between Residential West and Residential North. In addition, these light poles would be placed on the property side of the drive aisle, with the light source facing away from the residential property line and toward the street. Back-side shields also would be installed to ensure that 0.0 foot-candles of light would spill onto existing, adjacent properties.

Proposed signage would include on-site and off-site signage in various forms, including wall signs, digital displays, hotel building identification, residential building identification, retail and restaurant building identification, parking entry identification, loading dock entry identification, and wayfinding signage. No billboard signage is proposed. No lighting is proposed within the golf course. All lighting installed at the project site would be downward facing and shielded.

2.4.9 Project Design Features

Sustainability Features

The proposed project would include green building features to conserve energy, reduce water use, and reduce greenhouse gas emissions. All construction would meet or exceed California Green Building Standards Code (CALGreen) Part 11, Title 24 building code regulations. The following project design features (PDFs) would be incorporated into project design:

- PDF-1: **California Energy Code.** The project will comply with California Title 24, Part 6 Energy Code (2022, or most recent in effect at the time of building permit application). The following energy-efficient items will be required in all residential units: improved heating, ventilation, and air-conditioning systems with sealed (tight) air ducts; enhanced ceiling, attic, and wall insulation; installed energy-conserving appliances, such as whole-house fans; high-efficiency water heaters (i.e., tankless water heaters); energy efficient three-coat stucco exteriors; energy efficient appliances; programmable thermostat timers; and high-efficiency window glazing.
- PDF-2: **CALGreen Code.** As a matter of regulatory compliance, the project will comply with Section 5.106.5.2 of the California Green Building Standards Code (i.e., CALGreen Code) (2022, or most recent in effect at the time of building permit application). The project will provide designated parking for shared vehicles and clean air vehicles at the resort facility and at the project's parks. The project will also implement the latest CALGreen Code standards when building permits are requested.
- PDF-3: **Electric-Only Uses.** All uses on site, with the exception of the restaurant, will be "all electric." Natural gas will only be installed for the restaurant's use.
- PDF-4: **Energy Star Appliances.** Energy Star-rated appliances will be installed in all residences, and Energy Star-rated appliances, such as refrigerators, will be installed at the hotel and restaurant.
- PDF-5: **Low-Flow Water Appliances.** Low-flow toilets, faucets, and shower heads will be installed throughout the entire project.
- PDF-6: **Recyclables and Yard Waste.** Areas for storage and collection of recyclables and yard waste will be provided.
- PDF-7: **Residential Electric Vehicle Charging.** Every residential dwelling unit garage (242 units) will have Level 2 electric vehicle equipment installed.
- PDF-8: **Non-Residential Electric Vehicle Charging.** Forty-five percent of all non-residential parking spaces will be electric vehicle capable (132 spaces), and 33% of these electric-vehicle-capable parking spaces will have electric vehicle charging stations installed (44 units). [*EV capable* means that dedicated electrical-panel capacity and raceway infrastructure will be provided to support a future 40-ampere, 208/240-volt branch circuit for future, dedicated Level 2 electric vehicle equipment.]

- PDF-9: **Tree Planting.** Approximately 645 new trees will be planted within the development: 414 new trees in the residential development, 60 new trees on the golf course, and 171 new trees at the hotel site and access road.
- PDF-10: **On-Site Solar Energy Generation.** At least 1,168 kilowatts (kW) of solar energy generation will be installed on site (i.e., 1,089 kW on the residential units and 79 kW on the new resort). This exceeds the Sustainable Santee Plan (SSP) requirements. Under the SSP the project will be required to install 1 kW per unit for each multifamily unit, 2 kW per unit for each single-family unit, and 1.5 kW per square foot for commercial buildings. Under the SSP, 236 kW will be required for the multifamily development, 12 kW will be required for the single-family housing units, and roughly 78 kW will be required for the 51,926 square feet of commercial facilities. Given this, the SSP calls for at least 326 kW in total.

Fire Protection Features

A portion of the project site is within a Very High Fire Severity Zone that predominately encompasses the far western portion of the project site primarily under the jurisdiction of the City of Santee, and a small area under the jurisdiction of the City of San Diego. The project site is within the SFD jurisdictional response area. SFD Station 5, located at 9130 Carlton Oaks Drive, is the closest fire station to the project site and would likely be the first to respond. Additional information regarding wildfire protection services for the project is provided in Section 3.14, Public Services.

A Fire Protection Plan (Appendix R1) and Wildfire Evacuation Plan (Appendix R2) were prepared for the project to provide fire planning guidance, including requirements for reducing fire risk, an evaluation of demand for fire protection services, and requirements for provision of at least two evacuation routes for residents. Site access, including internal project roadways, emergency access roads, and site access points would comply with the requirements of the California Fire Code and City of Santee Municipal Code adopted at the time an application for building permits is filed. Potential wildfire impacts from construction and operation of the proposed project and fire protection measures included as part of the project are discussed further in Section 3.18, Wildfire. In addition, PDF-11 and PDF-12 provide fire protection and emergency access measures.

- PDF-11: **Fire Protection Measures.** The project proponent will implement the following fire protection measures:
- **Ignition-Resistant, Planned, and Maintained Landscape:** All site landscaping of common areas and fuel-modification zones (FMZs) will be subject to strict plant types that are lower-ignition plants, with landscaping closest to structures requiring irrigation to maintain high plant moisture, which equates to difficult ignition. FMZs will be a minimum of 100 feet from the structure outward, which will reduce the risk of an ignition spreading from the project site to adjacent land uses, and also the spread of fire toward on-site structures. Roadside FMZs will extend 50 feet from the roadside on both sides, which will reduce the risk of ignition related to vehicles traveling within the project site, and also provide fire buffered corridors to support safer evacuations. Additionally, twice-annual inspections of FMZs and ongoing maintenance will be implemented to ensure long-term effectiveness of FMZs. Further, the project will benefit from the golf course, which includes irrigated and maintained, low-fuel, highly ignition-resistant landscaping and open water, and functions as a large fuel break.

- **FMZ Around Perimeter of Project:** A 100-foot-wide FMZ will be required from each structure outward toward open space areas and will include specifically selected plant species, very low fuel densities (i.e., 30%–50% retention of native plants in outer zones and irrigated inner zones), and ongoing Homeowner's Association (HOA)-funded and -applied maintenance, resulting in a wide buffer between the developed areas and off-site native fuels. All project roads and the steel bridge at the abutments will also include, at minimum, a 50-foot FMZ. The roadside FMZs will have plant restrictions and maintenance requirements, as detailed in the project's Fire Protection Plan. Roadside FMZs associated with the steel bridge will be the responsibility of the golf course operator. The golf course operator, as part of maintenance of the golf course, will be responsible for proper brush management, and defensible space will be cleared underneath the bridge and extending outward from the bridge.
- **Twice-Annual FMZ Inspections:** The HOA for the residential areas and the owner/property management agency of the resort will have a contracted, third-party, City of Santee Fire Department (SFD)-approved FMZ inspector perform two inspections per year to ensure that FMZs are maintained in a condition that is consistent with the City of Santee's and the Fire Protection Plan's requirements.
- **Ignition-Resistant Structures:** All structures will be built to the ignition-resistant requirements found in California Building Code Chapter 7A that have been developed and codified as a direct result of post-fire save-and-loss assessments. These measures will result in homes that are designed, built, and maintained to withstand fires and embers associated with wildfires. Ignition-resistant structure design features will include the following:
 - Exterior walls of all structures and garages will be constructed with approved, noncombustible (e.g., stucco, masonry, approved cement fiber board) or ignition-resistant material from grade to the underside of the roof system. Wood-shingle and shake wall coverings are prohibited. Any unenclosed under-floor areas will have the same protection as exterior walls. Per City of Santee Building Code Chapter 7A, exterior wall coverings will extend from the top of the foundation to the underside of the roof sheathing, and terminate at 2-inch nominal solid-wood blocking between rafters at all roof overhangs, or in the case of enclosed eaves, terminate at the enclosure. The underside of any cantilevered or overhanging appendages and floor projections will maintain the ignition-resistant integrity of exterior walls, or projection will be enclosed to grade.
 - Eaves and soffits will meet the requirements of Surface Feet per Minute (SFM) 12-7A-3 or be protected by ignition-resistant materials or noncombustible construction on the exposed underside, per the City of Santee Building Code.
 - There will be no use of paper-faced insulation or combustible installation in attics or other ventilated areas.
 - There will be no use of plastic, vinyl (with the exception of vinyl windows with metal reinforcement and welded corners), or light wood on the exterior.
 - All roofs will be a Class A-listed and fire-rated roof assembly, installed per the manufacturer's instructions, to the approval of the City of Santee. Roofs will be made tight, with no gaps or openings on ends, in valleys, or elsewhere between the roof covering and decking to prevent intrusion of flames and embers. Any openings on the ends of roof tiles will be enclosed to prevent intrusion of burning debris. When provided, roof valley flashings will not be less than 0.019 inches (No. 26 gage galvanized sheet) corrosion-resistant metal

installed over a minimum 36-inch-wide underlayment consisting of one layer of 72-pound American Society for Testing and Materials (ASTM) 3909 cap sheet running the full length of the valley.

- No vents will be placed in soffits, cornices, rakes, eaves, or eave overhangs, or between rafters at eaves or in other overhang areas. Gable end and dormer vents will be at least 10 feet from the property lines or provided with alternative designs that are resistant to ember penetration. Vents in allowed locations will be protected with wire mesh having no openings larger than 0.125 inches. Vent openings will not exceed 144 square inches. Vents will be designed to resist the intrusion of burning embers and debris.
- Vents will not be placed on roofs unless they are approved for Class A roof assemblies and contain an approved baffle system, such as Brandguard or O'Hagin vents, to stop intrusion of burning material, or are otherwise approved.
- Turbine vents are prohibited.
- Exterior glazing in windows, sliding glass doors, and garage doors, or decorative or leaded glass in doors, will be dual pane with one tempered pane, glass block, or have a 20-minute fire rating. Glazing will comply with California Building Code Chapter 7A.
- Any vinyl frames will have welded corners and metal reinforcement in the interlock area to maintain integrity of the frame certified to ANSI/AAMA/NWDA 101/I.SI. S 2 97 requirements.
- Skylights will be tempered glass.
- Rain gutters and downspouts will be noncombustible and designed to prevent the accumulation of leaf litter and debris, which can ignite roof edges.
- Doors will conform to SFM 12-7A-1, or will be of approved noncombustible construction, or will be solid-core wood with stiles and rails not less than 1-3/8 inches thick, or have a 20-minute fire rating. Doors will comply with City of Santee Building Code Chapter 7A. Garage doors will be solid-core, 1.75-inch-thick wood or metal to comply with the City of Santee Building Code.
- Decks and their surfaces, stair treads, landings, risers, porches, and balconies will comply with City of Santee Building Code Chapter 7A and be of ignition-resistant construction; heavy timber; exterior-approved fire-retardant wood; or approved, noncombustible materials.
- Decks and overhangs projecting over vegetated slopes are not permitted. Decks will be designed to resist failing from the weight of a firefighter during fire conditions. Plastic or vinyl decking or railings are not allowed. The ends of decks will be enclosed with the same type of material as the remainder of the deck.
- Combustible awnings, canopies, or similar combustible overhangs are not allowed.
- No combustible fences will be allowed within 5 feet of structures on any lots. The first 5 feet from a structure will be noncombustible or meet the same fire-resistive standards as walls.
- All chimneys and other vents on heating appliances using solid or liquid fuel, including outdoor fireplaces and permanent barbeques and grills, will have spark arrestors that comply with the City of Santee Fire Code, which requires that openings do not exceed 0.25 inches. Arrestors will be visible from the ground.

- Any liquid propane gas tanks (except small barbecue and outdoor heater tanks), firewood, hay storage, storage sheds, barns, and other combustibles will be located at least 30 feet from structures and, within the FMZ, 30 feet from flammable vegetation. No flammable vegetation will be allowed under or within 30 feet of liquid propane gas tanks, or tanks will be enclosed in an approved, ignition-resistant enclosure with 10 feet clearance of flammable vegetation around it. In no case will a tank be closer than 10 feet from a structure. The City of Santee Fire Code requires 10 feet of clearance of native vegetation, weeds, and brush from under and around liquid propane gas tanks.
- Storage sheds, barns, and outbuildings will be constructed of approved, noncombustible materials, including noncombustible Class A roofs, and will be subject to the same restrictions as the main structure on the site.
- Any of the above-listed structures (e.g., outbuildings, storage sheds, barns, separate unattached garages) that are 500 square feet or smaller and 10 feet or more from an adjacent structure will not be required to include automatic fire sprinklers. Locations and required FMZs for these smaller structures will be subject to approval of the City of Santee's Fire Marshal and Building Official, based on the size of the structure.
- **Interior Fire Sprinklers:** Sprinklers in residences will be designed to provide additional time for occupants to escape the home, and sprinklers in multifamily and commercial structures will be designed to provide structural protection. Fire sprinklers are successful at assisting responding firefighters by either extinguishing a structural fire, or at least containing the fire to the room of origin and delaying flash-over. This benefit also reduces the potential for an open space-vegetation ignition by minimizing the possibility for structural fires to grow large and uncontrollable, resulting in embers that are blown into wildland areas.
- **Firefighting Water:** Water will be provided specifically for firefighting throughout the project site with fire hydrants that are accessible to fire engines. The project will provide firefighting water volume, availability, and sustained pressures to the SFD's satisfaction. Additionally, the project will provide the number and location of fire hydrants consistent with SFD Design Standards and the City of Santee Fire Code, and subject to SFD approval.
- **Water Utilities Constructed First:** As required by standard fire code regulations, before any combustible materials are brought onto the site for construction, the project must have all underground utilities in place; fire hydrants operational; water mains, curbs, gutters, sidewalks, and an approved all-weather roadway in place; and interim FMZs established and approved.
- **Homeowner Education:** Annual reminder notices will be provided to each homeowner encouraging them to review and be familiar with community evacuation protocols. The HOA will coordinate with local fire agencies to hold an annual fire safety and evacuation preparedness informational meeting. The meeting will be attended by representatives of appropriate fire agencies, and important fire and evacuation information will be reviewed. One focus of these meetings, and of the HOA's annual message, will be on the importance of each resident preparing and being familiar with their own *Ready, Set, Go!* evacuation plan. This proactive educational component of disclosing potential wildfire risks will be incorporated into the HOA's covenants, conditions, and restrictions.

Traffic and Circulation Features

PDF-12A: **Traffic Control Plan.** A traffic control plan will be prepared by the project proponent and implemented during construction, as required by the City of Santee and City of San Diego public improvement permits, which will be obtained to construct access roads to the residential developments and resort. The traffic control plan will include procedures that will be followed to properly and safely close lanes and redirect traffic, if necessary, during construction. Adherence to the traffic control plan will ensure that emergency response vehicles can safely access the project site and the vicinity, and that project construction will not conflict with established emergency evacuation routes. The traffic control plan will be consistent with the procedures and measures established by the Unified San Diego County Emergency Services Organization and County of San Diego in the *Operational Area Emergency Operations Plan (2022)*, which has been adopted by both the City of Santee and City of San Diego. The traffic control plan will also ensure that construction activities comply with the applicable City of Santee ordinances and regulations related to road closures and roadway construction. Furthermore, the traffic control plan will include information on how contractors are to comply with applicable requirements set forth by the County of San Diego's *Multi-Jurisdictional Hazard Mitigation Plan 2023*) for emergency events.

PDF-12B: **Intersection Safety Improvements.** The following improvements, which are included as part of the development footprint, would be made at the following intersections to improve pedestrian and bicycle safety:

- **West Hills Parkway and Mast Boulevard.** Bicycle detection (signal software upgrade and/or camera installation, or electro-magnetic loop detectors within the asphalt) to be added to the approaches of the intersection where Class II bicycle lanes are present.
- **West Hills Parkway and Carlton Oaks Drive.** Continental cross-walks installed at all legs of the intersection, pedestrian countdown signals installed at each corner of the intersection, and lead pedestrian intervals for all crossing phases of the intersection, if the current signal controller can accommodate it. These improvements are included within the off-site impact area included as part of the proposed project.
- **West Hills Parkway and Mission Gorge Road.** Bicycle detection (signal software upgrade and/or camera installation, or electro-magnetic loop detectors within the asphalt) to be added to the approaches of the intersection where Class II bicycle lanes are present.

Stormwater and Pollution-Control Features

The proposed project would implement the following PDFs related to stormwater:

PDF-13: **Stormwater Pollution Prevention Plan (SWPPP).** A project-specific SWPPP in compliance with the effective Construction General Permit and Jurisdictional Runoff Management Programs for the City of Santee and City of San Diego will be prepared and implemented. The SWPPP will identify which construction best management practices (BMPs) will be implemented to prevent stormwater runoff, and will include a monitoring plan for measuring BMP effectiveness. BMPs will include practices to minimize the contact of construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) with stormwater. The construction SWPPP will also specify properly designed, centralized storage areas that will keep these materials out of the

rain. When grading will be conducted during the rainy season, the primary BMPs selected will focus on erosion control (i.e., keeping sediment in place), and then on sediment control (i.e., keeping sediment on site). Measures will include a range of stormwater control BMPs, such as installing erosion-control materials (e.g., silt fences, staked fiber rolls, geofabric) to prevent silt runoff to storm drains and waterways, as well as sediment basin BMPs (e.g., sediment basins, check dams, sediment traps).

PDF-14: **Storm Water Quality Management Plan (SWQMP).** A Priority Development Project SWQMP will be prepared that identifies site design and source- and pollutant-control best management practices (BMPs) to reduce the discharge of pollutants to the maximum extent practicable. The SWQMP will incorporate the following quantifiable and nonquantifiable sustainability features that will manage stormwater source and pollutant loads:

- Prevent illicit discharges into the Municipal Separate Storm Sewer System (MS4).
- Install storm drain stenciling or signage.
- Protect outdoor materials storage areas from rainfall, run-on, run-off, and wind dispersal.
- Protect materials stored in outdoor work areas from rainfall, run-on, run-off, and wind dispersal.
- Protect trash storage areas from rainfall, run-on, run-off, and wind dispersal.

In addition, as identified in the project-specific Priority Development Project SWQMP, the proposed project will implement site design BMPs, where applicable and feasible. Site-design BMPs include the following:

- Maintain natural drainage pathways and hydrologic features.
- Conserve natural areas, soils, and vegetation.
- Minimize impervious areas.
- Minimize soil compaction.
- Incorporate impervious area dispersion.
- Install landscaping with native and/or drought-tolerant species.

Low-impact development and stormwater pollutant control BMPs designed to retain, biofilter, and treat stormwater runoff generated on the project site will be implemented. Applicable BMPs are identified in the City of Santee's 2021 *Jurisdictional Urban Runoff Management Program (JRMP)*, following the City of Santee's 2016 *BMP Design Manual*.

A Green Street SWQMP will be prepared for the project components that fall within the City of San Diego's jurisdiction. The applicable source control and site design BMPs will be implemented, in addition to the Green Street elements specified in the project's Green Street SWQMP. Applicable BMPs are identified in the City of San Diego's 2025 JRMP and follow the City of San Diego's 2024 *BMP Design Manual*.

PDF-15: **Scour and Erosion Prevention Measures.** The project will incorporate the following features to eliminate potential scour and erosion of the proposed slopes adjacent to the floodway and floodplain:

- Geotextile turf reinforcement mat that binds to the soil for slope surface stabilization and slope reinforcement.
- Geotechnical soil reinforcement to ensure that high-flow velocities will not erode or damage the embankment.
- Rock riprap and/or concrete energy dissipators for all storm drain outlets to reduce the rate of storm runoff velocity to a nonerosive level and to prevent erosion and siltation.

Scenic View Features

PDF 16: [Security Fence Coloring](#). Security fences will be powder-coated and colored dark evergreen, dark brown, or black to make the safety fencing appear more see-through than untreated, light-grey fencing that can act as a visual barrier.

2.4.10 Stockpiling Sites

The project would require the import of soil to raise the proposed resort, hotel, and residential development out of the City of Santee and Federal Emergency Management Agency-mapped floodplain. This import of soil would most likely take place over an extended period of time, prior to the start of grading.

One temporary site for the stockpiling of soil is proposed. The stockpiling site would be on the eastern side of the project site within the current golf course driving range. It would accommodate import of approximately 279,020 cubic yards of soil, and temporary BMPs for sediment and erosion control would be provided. Access to the stockpiling site would be from Inwood Drive.

To comply with federal and state water quality regulations, a SWPPP would be prepared during the final engineering phase prior to issuance of a grading permit, and temporary sediment- and erosion-control BMPs would be implemented (see PDF-9 for more information). The SWPPP would be implemented in compliance with the 2022 Construction Stormwater General Permit, Order 2022-0057-DWQ, City of Santee requirements as outlined in its *Guidelines for Surface Water Pollution Prevention* (City of Santee 2015), the City of Santee's JRMP (City of Santee 2021), the City of San Diego's *Stormwater Standards* (City of San Diego 2024), and the City of San Diego's JRMP (City of San Diego 2025). The site would not be disturbed prior to preparation of the SWPPP, approval of a Notice of Intent, and receiving a waste discharge identification number.

2.4.11 Off-Site Improvements

The following off-site improvements would be required as part of the proposed project:

1. **Emergency Vehicle Access Roadway Construction:** The project would include construction of a 26-foot-wide emergency vehicle access roadway from the Vista del Verde community south onto the golf course property to the developed portion of the resort. One parking spot on the Vista del Verde property may be removed but would be relocated within that property. The project would also include installation of a motorized gate and replacement of the existing chain-link fence with a steel tubular fence on the boundary of the golf course.
2. **West Hills Parkway Widening:** West Hills Parkway would be widened within the existing ROW from Carlton Oaks Drive, approximately 700 feet south of the existing bridge, to provide a dedicated left-turn lane into Residential West. Updates would include a striped median and increased width for bike lanes. Trees are

proposed on both sides of West Hills Parkway to provide source control of stormwater, limit stormwater transport and pollutant conveyance to the collection system, restore predevelopment hydrology to the extent possible, and provide environmentally enhanced roads. This work would occur within the City of San Diego's jurisdiction, and therefore would follow City of San Diego standards.

3. **PDMWD Public Water Main Extension:** To provide a connection to the proposed private water system, a PDMWD water main would be extended from Carlton Oaks Drive, south along West Hills Parkway, and into Residential West.
4. **Residential North and Resort Area Access:** Carlton Oaks Drive would provide access to Residential North and the resort at the intersection of Burning Tree Way, approximately 200 feet west of the existing hotel access road (i.e., Inwood Drive). Inwood Drive would be closed and replaced with curbs and sidewalks. Additionally, six existing driveway aprons along the project frontage would be closed and replaced with curbs, landscaping, and other improvements, such as overhead power undergrounding. Overhead power undergrounding would extend north of Carlton Oaks Drive and would require four new utility poles (see Section 2.4.5, Utilities, for additional detail). Potable and recycled water would be connected to existing main lines in Carlton Oaks Drive and extended into the project site.
5. **Drainage Improvements:** Existing drainage pipes discharge to the golf course at five locations along the northern subdivision boundary, as described below. All project-related improvements would be constructed in a manner that would maintain the existing flow and drainage patterns.
 - a. **Current:** An existing 42-inch-diameter storm drain discharges to the site from a headwall approximately 15 feet off site, within a public easement (City of Santee-owned) on an existing residential lot (Lot 17 of Map 4402).
 - **Improvement:** The off-site flows would be picked up on site by proposed private 36-inch/42-inch reinforced concrete pipe storm drain improvements just west of buildings 42–52 within an HOA common area and would discharged into the San Diego River (North Channel). Riprap would be placed between the existing outfall at the north to the proposed storm drain headwall on site to the south.
 - b. **Current:** An existing 27-inch storm drain extends onto the project site from an existing residential lot (Lot 14 of Map 5417).
 - **Improvement:** This pipe would be extended under the proposed access road to a new headwall and discharge onto the golf course.
 - c. **Current:** An existing 18-inch storm drain discharges to the site from a headwall approximately 15 feet off site within a public easement (City of Santee-owned) on an existing residential lot (Lot 230 of Map 6973).
 - **Improvement:** The off-site flows would be picked up on site by proposed 18-inch reinforced concrete pipe storm drain improvements and extended southeasterly under the proposed access road then discharged into the San Diego River (North Channel).
 - d. **Current:** An existing 47- by 71-inch storm drain discharges to the site from a headwall approximately 20 feet off site within a public easement (City of Santee-owned) on an existing residential lot (Lot 239 of Map 6973).
 - **Improvement:** The off-site flows would be picked up on site by a proposed 43-inch by 68-inch reinforced concrete pipe storm drain and extended southerly under the proposed access road then discharged onto the golf course just north of the San Diego River (North Channel).

- e. **Current:** An existing 72-inch-diameter storm drain pipe discharges to the site from the headwall immediately off site at the northern property line of Residential West. The existing headwall includes a large concrete energy dissipator and concrete channel. These storm drain facilities are on existing residential lots (Lots 679 and 680 of Map 7295) and within an existing, City of Santee-owned public easement.
 - **Improvement:** The off-site flows would be picked up on site by proposed private 84-inch storm drain improvements between Building 18 and 19 then within private drive “C” southeasterly and discharged onto the golf course through a proposed 90-inch storm drain just north of the San Diego River (North Channel).
- 6. **Sewer Maintenance Hole Improvements:** Three existing sewer maintenance holes are located off site within a PDMWD easement in the Vista del Verde condominium property. The need for engineered sewer maintenance hole liners would be determined in the project design phase. All work would be limited to within the already disturbed public easement area.

2.4.12 Irrevocable Offer of Dedication Termination

The applicant is requesting the termination of an Irrevocable Offer of Dedication associated with the previous map (Parcel Map 16798) originally required for the right to extend and maintain drainage facilities, excavation, and embankment slopes beyond the limits of the extension of Fanita Parkway as offered and rejected on Parcel Map No. 16978.

2.5 Project Construction

Construction of the proposed project, including the residential development, golf course improvements, trail segments, clubhouse, and resort, would occur in eight phases (Figure 2-16, Conceptual Phasing Plan). In the resort area, improvements needed for interim golf operations would occur first, and construction of the hotel and cottages would occur in later phases. The objective of project phasing is to coordinate the provision of public facilities and services with the anticipated sequence pattern of development. The conceptual phasing plan may change in response to changing market conditions or other unforeseen conditions. The phasing of development and implementation of public facilities may be modified as long as the required public improvements are provided at the time of need. The conceptual phases for the proposed project are as follows:

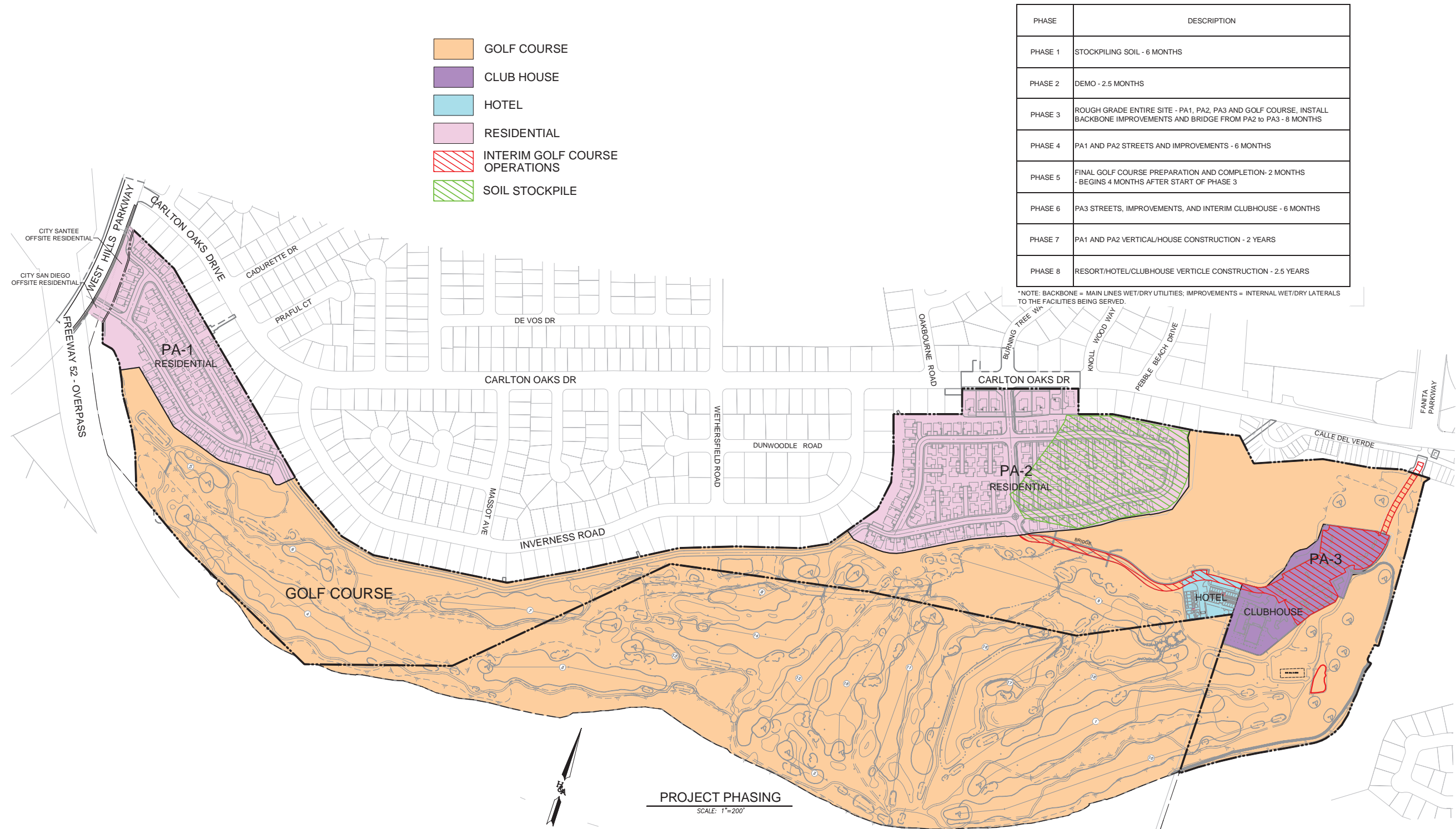
- **Phase 1:** Stockpiling soil – 6 months
- **Phase 2:** Demolition – 2.5 months
- **Phase 3:** Rough grade the entire site (Residential West and North, resort, and golf course), install backbone improvements (main lines for wet/dry utilities), and construct bridge from Residential North to resort – 8 months
- **Phase 4:** Construct Residential West and North streets and improvements (internal wet/dry laterals to facilities) – 6 months
- **Phase 5:** Final golf course preparation and completion – 2 months beginning 4 months after start of Phase 3
- **Phase 6:** Construct resort streets, improvements, and interim clubhouse – 6 months
- **Phase 7:** Construct Residential West and North houses – 2 years
- **Phase 8:** Construct resort, hotel, and clubhouse – 2 years

Phases would take approximately 2 months to 2 years to complete. Phases 4 through 8 would overlap as development progresses. In the residential areas, construction of the residential units would be staggered. Project construction is expected to begin in the third quarter of 2025 and be completed by the first quarter of 2029. Construction activities would occur between 7 a.m. and 7 p.m., in compliance with the City of Santee Noise Ordinance (Municipal Code Section 5.04.090) and the City of San Diego Noise Ordinance (Municipal Code Section 59.5.0404). Construction staging activities would occur within the project site. All proposed staging areas are paved or heavily disturbed, with no existing vegetation.

Generally, construction materials used for the proposed project would consist of wood, paints and finishing products, insulation, glass, rebar, structural steel, concrete, electrical and mechanical systems, and landscaping materials. Standard off-road construction equipment would be used, including dozers, excavators, loaders, backhoes, rollers, compactors, and scrapers. Off-road equipment would be operational for approximately 8 hours per day during construction. Additional equipment would include trucks for delivery of construction materials, disposal of demolished and excavated materials, and transport of water for dust control. A maximum of 210 construction workers would access the site during the peak of construction, with an average of approximately 80 workers per day during non-peak times. Additionally, construction activities are anticipated to generate a maximum of 111 haul-truck trips per day to transport miscellaneous material and equipment during peak times, with minimal truck trips occurring during non-peak times.

Demolition and grading activities would occur first. The clubhouse, restaurant/bar, pro shop, 52-room hotel, and surface lots would be demolished to accommodate construction of the proposed project. Grading of the project site would occur at the same time as demolition of these facilities. The total graded area would be 118.7 acres and would require import of approximately 279,020 cubic yards of soil, 258,244 cubic yards of raw cut, and 512,445 cubic yards of raw fill. There would be approximately 72,579 cubic yards of shrink and 47,760 cubic yards of construction spoils (Figure 2-17, Cut and Fill Plan). Grading is expected to consist of cuts and fills to create building pads, install streets, and raise the southern portion of the project site (near the San Diego River) approximately 10 to 20 feet. All cut and fill slopes would be constructed at a maximum ratio of 2:1. Figure 2-17 shows the conceptual cut and fill plan. Construction waste generated from demolition and excavation would be transported from the site and disposed of at the closest approved landfill or recycling facility. The project would comply with all applicable construction recycling regulations.

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Source: Hunsaker & Associates San Diego, Inc.,1/31/2025.

Figure 2-16
Conceptual Phasing Plan

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Source: Hunsaker & Associates San Diego, Inc., 1/30/2025.

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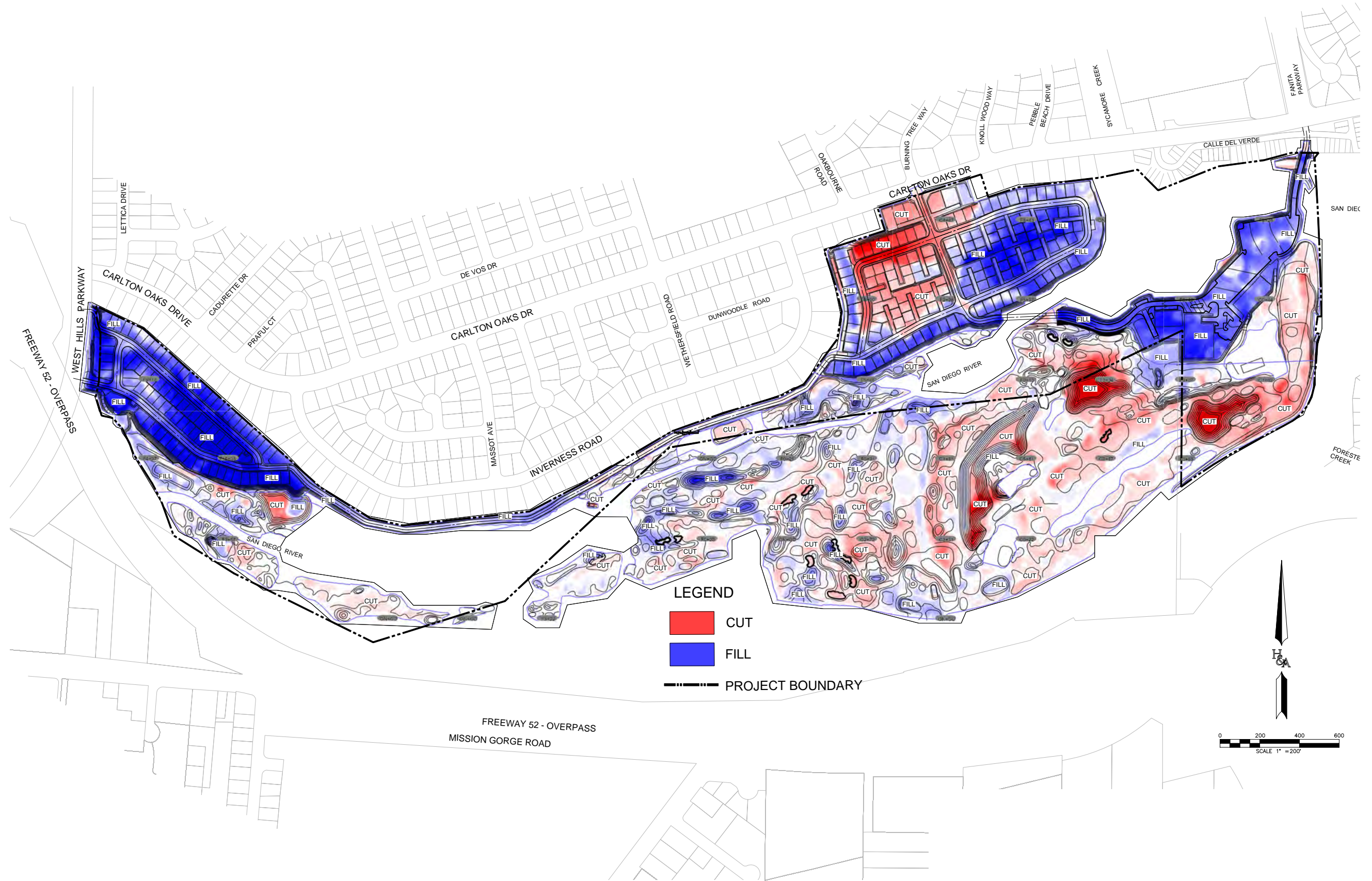


Figure 2-17
Cut and Fill Plan

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2.6 Project Operation

The completed project would consist of a golf course, clubhouse, hotel, retail and resort amenities, and residential homes. In addition to guest rooms, the hotel and clubhouse would provide space for special events, such as golf tournaments, weddings, banquets, and conferences. The redesigned golf course would provide recreational opportunities for the community. Retail options could include a restaurant, bar, and a pro shop. There would be a nominal increase in the number of employees needed for the redesigned clubhouse and resort compared to the existing facilities at the project site. The number of staff needed for golf course and hotel maintenance and operation would be similar to existing staff levels; however, the proposed project is expected to require a few additional catering staff to accommodate the anticipated increase in events. Events currently occur, on average, once a week, but are expected to increase to two to three per week. Catering staff would only be present when events are occurring. Even with the additional catering staff, the proposed project would not be expected to employ more than 100 people at one time.

2.6.1 Operating Equipment

Operating equipment would be needed for multiple components of the completed project. The proposed clubhouse and hotel would be served by a central plant, which would include a conventional emergency generator, central chiller, cooling tower, boiler plant, dedicated outside air-handling systems, air-handling units, fans, and a domestic hot-water plant. Residential units would include equipment typical for any residential development, such as circuit breakers, air conditioning and heating systems, and hot-water heaters.

2.7 Required Project Approvals

As the lead agency under CEQA, the City of Santee would be responsible for carrying out the proposed project and permitting the portions of the project that fall within the City of Santee's jurisdiction. As a responsible agency under CEQA, the City of San Diego would be responsible for permitting the portions of the proposed project that fall within its permitting authority. The following permits and approvals would be required to implement the proposed project.

2.7.1 City of Santee

As the CEQA lead agency, the City of Santee would use this EIR and supporting documentation in its decision to approve the required discretionary permits. The following permits and approvals may be required by the City of Santee for implementation of the proposed project:

- Certification of the EIR
- Adoption of the Mitigation Monitoring and Reporting Program
- Adoption of the Findings of Fact
- Adoption of the Statement of Overriding Considerations, if applicable
- Approval of the proposed project
- Approval of the Tentative Map
- Approval of the Development Review Permit
- Approval of the Conditional Use Permit

- Issuance of Ministerial Construction Permits (e.g., building, grading, final mapping)
- The termination of that certain Irrevocable Offer of Dedication for the right to extend and maintain drainage facilities, excavation, and embankment slopes beyond the limits of the extension of Fanita Parkway as offered and rejected on Parcel Map No. 16978

2.7.2 City of San Diego

As previously noted, a portion of the proposed golf course is located within the City of San Diego. As a responsible agency under CEQA, the City of San Diego would use this EIR and supporting documentation in its decision to approve required discretionary permits. The following permits and approvals may be required by the City of San Diego for implementation of the proposed project:

- Responsible agency findings and considering of EIR
- Issuance of a Site Development Permit
- Approval of landscaping, utility, access, and maintenance easements
- Issuance of Ministerial Permits (including grading permits)
- Approval of a City of San Diego Multi-Habitat Planning Area (MHPA) Boundary Line Adjustment and Boundary-Line Correction
 - MHPA is designated over the existing golf course along the southern edge of the project site. Within the project site, the MHPA covers 12.86 acres of golf course and 0.33 acres of avoided riparian habitat. The golf course was established in 1958 and renovated in 1989, long before the original MHPA boundary for the site was established as part of the regional MSCP mapping efforts, which became effective in March 1997. A Boundary Line Adjustment to remove the 0.33 acres of riparian habitat from the MHPA may be required and Boundary Line Correction may be warranted for the 12.53 acres of MHPA that overlaps with the existing golf course.

2.7.3 Federal and State Agencies

Prior to construction of the proposed project, the project proponents would be required to obtain the following permits and approvals from state and federal agencies:

- **U.S. Army Corps of Engineers:** Clean Water Act Section 404 authorization (Nationwide Permits 29, 39, and 42)
- **U.S. Fish and Wildlife Service:** City of San Diego Permit (with conformance to Environmentally Sensitive Lands regulations) for impacts in the City of San Diego and/or Endangered Species Act Section 7 Incidental Take Permit for Endangered Species Compliance
- **Federal Emergency Management Agency:** CLOMR and LOMR
- **Regional Water Quality Control Board:** Clean Water Act Section 401 Water Quality Certification
- **California Department of Fish and Wildlife:** California Fish and Game Code Section 1602 Streambed Alteration Agreement and Incidental Take Permit under Section 2081
- **State Water Resources Control Board:** National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit)
- **Federal Aviation Administration:** Project determination and approval for construction equipment and operational structures

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3 Environmental Analysis

3.0 Introduction

Sections 3.1 through 3.18 of Chapter 3 of this Environmental Impact Report (EIR) contain a discussion of the potential significant environmental effects that could result from implementation of the proposed Carlton Oaks Country Club and Resort Project (project), including information related to existing site conditions, criteria for determining significance of potential environmental impacts, analyses of the type and magnitude of environmental impacts, and feasible mitigation measures that would reduce or avoid significant environmental impacts.

3.0.1 Potential Environmental Impacts

This chapter provides an analysis of the potential environmental impacts that the proposed project could have on the following topics:

- Section 3.1, Aesthetics and Visual Resources
- Section 3.2, Air Quality and Health Risks
- Section 3.3, Biological Resources
- Section 3.4, Cultural and Tribal Cultural Resources
- Section 3.5, Energy
- Section 3.6, Geology and Soils
- Section 3.7, Greenhouse Gas Emissions
- Section 3.8, Hazards and Hazardous Materials
- Section 3.9, Hydrology and Water Quality
- Section 3.10, Land Use and Planning
- Section 3.11, Mineral Resources
- Section 3.12, Noise and Vibration
- Section 3.13, Population and Housing
- Section 3.14, Public Services
- Section 3.15, Recreation
- Section 3.16, Transportation and Circulation
- Section 3.17, Utilities and Service Systems
- Section 3.18, Wildfire

It was determined that the proposed project would have no impact associated with agriculture and forestry resources or mineral resources (Threshold 2) as described in Chapter 4, Other CEQA Considerations, of this EIR.

3.0.2 Format of the Environmental Analysis

Each of the 18 environmental topic sections of this chapter includes the subsections described below.

3.0.2.1 Overview

This subsection briefly describes the criteria considered in the particular resource section, summarizes the resources used to compile the information presented for the environmental analysis, summarizes the potential environmental effects of the proposed project, and provides feasible mitigation measures, when needed.

3.0.2.2 Environmental Setting

According to the State California Environmental Quality Act (CEQA) Guidelines Section 15125, an EIR must include a description of the existing physical environmental conditions in the vicinity of a project site to provide the “baseline condition” against which project-related impacts are compared. Within this EIR, the environmental setting subsections describe, from a regional and local perspective, the physical environmental conditions in the vicinity of the project site and at the project site at the time of publication of the Notice of Preparation (NOP) to compare and establish the type and extent of the potential environmental effects of the proposed project.

3.0.2.3 Applicable Laws and Regulations

This subsection provides a summary of regulations, plans, policies, and laws at the federal, state, and local levels that are relevant to the proposed project as they relate to the particular environmental resource area in discussion. Compliance with these applicable laws and regulations is mandatory unless otherwise noted within the analysis.

3.0.2.4 Project Impact Analysis

This subsection describes the methodology used for the analysis of the potential environmental impacts of the proposed project, identifies the criteria for determining the significance of potential impacts, and states a conclusion as to whether the environmental impacts would be considered significant and unavoidable, less than significant with mitigation incorporated, or less than significant (see definitions below).

The project impact analysis presents evidence based on scientific and factual data about the cause-and-effect relationship between the project and potential changes in the environment. The exact magnitude, duration, extent, frequency, range, or other parameters of a potential impact are ascertained to the extent possible to provide facts in support of finding whether the impacts of the proposed project would meet or exceed the established threshold of significance (see below) for each topic. Each resource topic is organized based on potential impacts and separated by construction and operation impacts wherever relevant. Where potential impacts would be significant, mitigation measures are identified to minimize, rectify, reduce, eliminate, or compensate for the significant impacts to the extent feasible.

Methodology

Each methodology subsection describes the sources or methods used to analyze potential impacts on a particular resource and discusses the steps followed in preparation of the impact analysis for each resource topic.

Thresholds of Significance

Thresholds of significance are criteria used to assess whether potential environmental effects would be significant and assist the reader in understanding how that determination was reached. The significance criteria used in this analysis are primarily based on State CEQA Guidelines Appendix G and the City of San Diego’s *California*

Environmental Quality Act Significance Determination Thresholds (City of San Diego 2022). The City of Santee does not have its own adopted CEQA thresholds of significance. The thresholds of significance define the type, amount, and/or extent of impacts that would be considered significant adverse changes in the environment. The thresholds of significance for some environmental topics, such as air quality and noise, are quantitative, whereas those for other topics, such as visual quality, are qualitative.

3.0.2.5 Project Impacts and Mitigation Measures

The project impacts and mitigation measures subsections of this EIR are further separated into four subsections:

1. **Impact Discussion:** Provides facts and scientific data in support of the Impact Determination
2. **Impact Determination:** Makes a determination as to whether the impacts of the proposed project would meet or exceed the established significance criteria
3. **Mitigation Measures:** Identifies measures that can reduce or avoid the potentially significant impacts identified in the analysis
4. **Level of Significance After Mitigation:** Indicates what effects remain after the implementation of mitigation measures and whether the remaining effects are considered significant

The analysis of environmental impacts considers both the construction and operation of the proposed project, where relevant. As required by State CEQA Guidelines Section 15126.2(a), direct, indirect, short-term, long-term, on-site, and/or off-site impacts are addressed, as appropriate, within the analysis of each environmental issue area. This EIR utilizes the following terms to describe the level of significance of impacts identified during the course of the environmental analysis:

- **No Impact:** This term is used when the project's construction and/or operation would have no adverse effect on a resource.
- **Less than Significant:** This term is used to refer to impacts resulting from implementation of the proposed project that would not be likely to exceed the defined thresholds of significance, and potentially significant impacts that would be reduced to a level that does not exceed the defined thresholds of significance after implementation of mitigation measures. In the latter case, the determination may also be stated as "less than significant with mitigation incorporated."
- **Significant:** This term is often used to refer to impacts resulting from implementation of the proposed project that exceed the defined thresholds of significance and can be applied before identification of any mitigation measures. A *significant effect* is defined by State CEQA Guidelines Section 15382 as follows:

[A] substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. [but] may be considered in determining whether the physical change is significant.

For impacts that exceed a threshold of significance, mitigation measures that avoid or reduce the potential impact are identified. In some cases, these measures may cause the impact to be reclassified as less than significant if it is sufficiently reduced, or the impact may remain significant, in which case it is referred to as a *significant and unavoidable* impact (or unavoidable significant impact).

- **Significant and Unavoidable:** This term is used to refer to significant impacts that would result from implementation of the proposed project that cannot be eliminated or reduced to below standards of significance through implementation of feasible mitigation measures.
- **Mitigation Measures:** State CEQA Guidelines Section 15126.4 requires an EIR to “describe feasible measures which could minimize significant adverse impacts.” *Mitigation* includes avoiding an impact altogether, minimizing impacts, rectifying impacts, reducing or eliminating impacts over time, or compensating for impacts by replacing or providing substitute resources. State 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.” The mitigation measures subsections list the mitigation measures that could reduce the severity of any impacts identified in the project impact analysis subsection. *Mitigation measures* are the specific environmental requirements for construction or operation of the proposed project that would be included in the Mitigation Monitoring and Reporting Program and adopted as conditions of approval of the proposed project.

When impacts, even with the inclusion of mitigation measures, cannot be mitigated to a less-than-significant level, they are identified as *unavoidable significant impacts*. To approve a project with unavoidable significant impacts, the lead agency must adopt a Statement of Overriding Considerations at the time of EIR certification. In adopting such a statement, the lead agency must find that it has reviewed the EIR, balanced the benefits of the project against its significant effects, and concluded that the benefits of the project outweigh the unavoidable adverse environmental effects, and therefore, the adverse environmental effects may be considered “acceptable” (State CEQA Guidelines Section 15093[a]).

3.0.2.6 Cumulative Impacts and Mitigation Measures

According to State CEQA Guidelines Section 15355, *cumulative impacts* refer to the following:

[T]wo or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

In addition, State CEQA Guidelines Section 15130(a) further states the following:

An EIR shall discuss cumulative impacts of a project when a project’s incremental effect is cumulatively considerable.... When the combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR... An EIR may determine that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant...if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

The discussion of cumulative impacts in an EIR evaluates whether the impacts of a project would be significant when considered in combination with past, present, and probable future projects and whether a project would make a cumulatively considerable contribution to those impacts. State CEQA Guidelines Section 15130(b) recognizes that the analysis of cumulative impacts need not be as detailed as the analysis of project-related impacts but instead should “be guided by the standards of practicality and reasonableness.” State CEQA Guidelines indicate that, where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, it need not consider the effect significant but must briefly describe the basis for its conclusion. As further clarified by State CEQA Guidelines Section 15065, *cumulatively considerable* means that “the incremental effects of an individual project [would be considerable] when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” State CEQA Guidelines allow for a project’s contribution to be rendered less-than-cumulatively considerable with implementation of mitigation.

The geographic scope of the cumulative impact analysis varies depending on the specific environmental issue area being analyzed. For example, cumulative geology and soils or aesthetics impacts are considered localized, whereas cumulative transportation and air quality impacts are considered regional. Table 3-1 summarizes the geographic scope of the analyses for the major cumulative issues analyzed in the following sections:

Table 3-1. Geographic Scope of Cumulative Impact Analyses

Environmental Issue	Geographic Scope of Cumulative Analyses
Aesthetics and Visual Resources	City of Santee, City of San Diego, and local project vicinity
Air Quality and Health Risks	San Diego Air Basin and local project vicinity
Biological Resources	City of Santee and City of San Diego (including the San Diego Multiple Species Conservation Program [MSCP] boundary, Draft Santee MSCP Subarea Plan Area, and the City of San Diego MSCP Subarea Plan Area)
Cultural and Tribal Cultural Resources	City of Santee, City of San Diego, and local project vicinity
Energy	State of California, City of Santee, and City of San Diego
Geology and Soils	County of San Diego, City of Santee, City of San Diego, and project sites in the local project vicinity
Greenhouse Gas Emissions	Global
Hazards and Hazardous Materials	County of San Diego, City of Santee, City of San Diego, and facilities in the local project vicinity
Hydrology and Water Quality	San Diego River Watershed Management Area, San Diego River Valley Groundwater Basin, City of Santee, City of San Diego, and local project vicinity
Land Use and Planning	City of Santee and City of San Diego
Mineral Resources	County of San Diego, City of Santee, and City of San Diego
Noise and Vibration	Local project vicinity
Population and Housing	County of San Diego, City of Santee, and City of San Diego
Public Services	County of San Diego, City of Santee, City of San Diego, and local project vicinity
Recreation	City of Santee, City of San Diego, and the local project vicinity
Transportation and Circulation	County of San Diego, City of Santee, and City of San Diego
Utilities and Service Systems	County of San Diego, City of Santee, City of San Diego, and utility service areas in the local project vicinity
Wildfire	City of Santee, City of San Diego, and local project vicinity

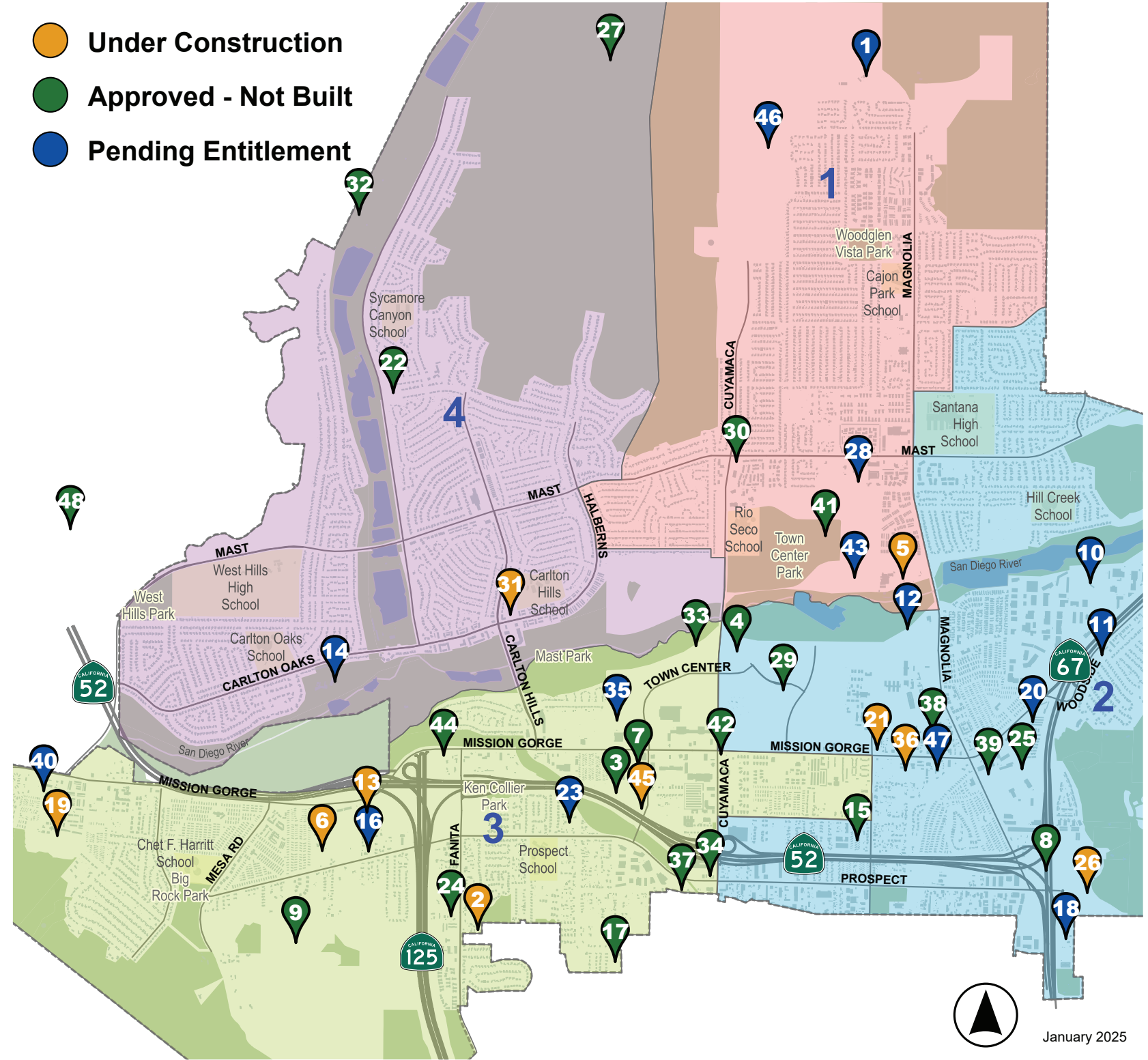
According to State CEQA Guidelines Section 15130(b), analysis of cumulative impacts may be conducted using one of two methods: (1) the List Method, which includes “[a] list of past, present, and probable future activities producing related or cumulative impacts”; or (2) the Plan Method, which uses “[a] summary of projections contained in an adopted local, regional or statewide plan, or related planning document...or in an adopted or certified prior environmental document for such a plan.” Pursuant to State CEQA Guidelines Section 15130(b)(1)(A), a list of past, present, and probable future projects producing related or cumulative impacts is used as the basis of this cumulative impacts analysis.

The list of cumulative projects is derived from information provided by the City of Santee. The list includes projects that have had applications submitted or have been approved, are under construction, or have recently been completed. The cumulative projects identified in the study area are listed in Table 3-2 (project numbering corresponds to numbers shown in Figure 3-1). Table 3-2 includes one project within the City of San Diego, the Sycamore Landfill Master Plan Expansion. Other land uses adjacent to the project site within the City of San Diego are open space and public infrastructure; therefore, no additional cumulative projects in the City of San Diego were included.



Active Projects

- Under Construction
- Approved - Not Built
- Pending Entitlement



- 1 Warmington Townhomes**
42-unit residential townhomes
10939 Summit Ave.
- 2 D'Lazio Condominiums**
20 residential condominium units
8439 Fanita Dr.
- 3 Vactor Decanting Station**
Vactor truck dewatering station
9534 Via Zapador
- 4 Karl Strauss**
Brewery, tasting room, & restaurant
300 Town Center Pkwy.
- 5 Walker Trails Subdivision**
67 single-family homes
9381 Walker Way
- 6 Prospect Estates II Subdivision**
38 condos, 15 single-family homes
8705 Marrokal Ln.
- 7 Palazzo Villas**
8 residential condominium units
8842 Olive Ln.
- 8 Starbucks & 7-Eleven**
4,800 sq.ft. coffee shop & convenience store
8606 Graves Ave.
- 9 Tyler Street Subdivision**
14 single-family homes
8500 Tyler St.
- 10 North Palisade Industrial Building**
300,145 sq.ft. industrial building
10990 N. Woodside Ave.
- 11 Shadowhill Commercial**
6,197 sq.ft. commercial building
Shadowhill Rd. & Woodside Ave.
- 12 County Animal Shelter**
23,303 sq.ft. animal shelter
Riverview Pkwy.
- 13 Woodspring Suites Hotel**
120-guestroom, 4-story hotel
8707 Mission Gorge Rd.
- 14 Carlton Oaks Country Club**
243 residential units & hotel
7200 Inwood Dr.
- 15 All Right Storage**
RV and self storage facility
8708 Cottonwood Ave.
- 16 Prospect Avenue Subdivision**
4 single-family homes
8732 Prospect Ave.
- 17 New West Subdivision**
11 single-family homes
9463 Slope St.
- 18 Graves Avenue Self-Storage**
RV & Self-Storage Facility
8355 Graves Ave.
- 19 Laurel Heights Condominiums**
80 residential condominium units
7750 Laurel Heights Dr.
- 20 Extra Space Storage**
88,390 sq.ft. (3-story) storage building
10815 Woodside Ave.
- 21 Popeye's**
1,740 sq.ft. drive-through restaurant
10308 Mission Gorge Rd.
- 22 Lake Canyon Subdivision**
9 single-family homes
9210 Lake Canyon Rd.
- 23 Atlas View Apartments**
10 residential apartment units
8726 Atlas View Dr.
- 24 Fanita Drive Townhomes**
8 residential townhomes
8504 Fanita Dr.

- 25 Southwest Signal Building**
20,000 sq.ft. industrial building
10756 Rockvill St.
- 26 Lantern Crest**
432-unit congregate care facility w/ density bonus
300 Lantern Crest Way
- 27 Fanita Ranch Development**
Master-planned community w/ 2,949 homes
Fanita Ranch
- 28 Paseo**
53-unit condominium units
701 Park Center Dr.
- 29 Excel Hotel**
97 guestroom, 4-story hotel
381 Town Center Pkwy.
- 30 Cuyamaca Business Center**
6,280 sq.ft. medical office building
9745 Cuyamaca St.
- 31 Ukrainian Catholic Church**
4,400 sq.ft. church
9308 Carlton Oaks Dr.
- 32 Atlas Cell Phone Tower**
74' cell phone tower at Padre Dam
10400-CS Fanita Pkwy.
- 33 Lutapaj Specialty Food Store**
2,016 sq.ft. specialty food & tasting facility
282 Town Center Pkwy.
- 34 Cuyamaca/Prospect Starbucks**
1,270 sq.ft. drive-through coffee shop
8606 Cuyamaca St.
- 35 Walmart Housing Site**
115 residential townhomes
NW of Mission Gorge Rd. / Town Center Pkwy.
- 36 Santee Auto Center**
Two car dealerships, auto body shop, & car wash
10335 Mission Gorge Rd.
- 37 Fordyce Construction Office**
9,948 sq.ft. office and contractor storage
9735 Prospect Ave.
- 38 Habitat for Humanity Townhomes**
17 residential townhomes
8932 First St.
- 39 Super Star Car Wash**
4,980 sq.ft. car wash tunnel
8837 Magnolia Ave.
- 40 Aubrey Glen Townhomes**
52 residential townhomes
7737 Mission Gorge Rd.
- 41 Santee Community Center**
Community Center, Event Center, & Gymnasium
10123 Riverwalk Dr.
- 42 Cuyamaca St Right Turn Pocket**
New right-turn only lane
Cuyamaca St & Mission Gorge Rd Intersection
- 43 Parkvue**
358 multi-family residential units
Cottonwood Ave. & Walker Trails Dr.
- 44 Soapy Joe's**
Express Car Wash conversion
9015 Mission Gorge Rd.
- 45 Interim Fire Station**
Fire Station No. 20 relocation
9532 Via Zapador
- 46 AT&T Princess Joann Tower**
Cell tower for AT&T
N. of Cuyamaca St & W. of Princess Joann Rd
- 47 Valvoline Instant Oil Change**
Valvoline Instant Oil Change Station
10463 Mission Gorge Rd
- 48 City of San Diego**
Sycamore Landfill Master Plan Expansion
8514 Mast Boulevard

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Source: City of Santee, 1/2025.



Figure 3-1
Cumulative Projects

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Table 3-2. Cumulative Projects

No.	Project Title	Address	Land Use	Status
1	Warmington Townhomes	10939 Summit Avenue	42 residential condominium units	Pending entitlement
2	D’Lazio Condominiums	8439 Fanita Drive	20 residential condominium units	Approved 8/23/06 – under construction
3	Vactor Decanting Station	9534 Via Zapador	Vactor truck dewatering station	Approved – not built
4	Karl Strauss	300 Town Center Parkway	Brewery, tasting room, and restaurant	Approved 12/17/15 – not built
5	Walker Trails Subdivision	9381 Walker Way	67 single-family homes	Approved 8/8/18 – under construction
6	Prospect Estates II Subdivision	8705 Marrokal Lane	38 condos, 15 single-family homes	Approved 10/9/19 – under construction
7	Palazzo Villas	8842 Olive Lane	8 residential condominium units	Approved 2/12/20 – not built
8	Starbucks and 7-Eleven	8606 Graves Avenue	4,800-square-foot coffee shop and convenience store	Approved 6/10/20 – not built
9	Tyler Street Subdivision	8500 Tyler Street	14 single-family homes	Approved 4/24/24 – not built
10	North Palisade Industrial Building	10990 North Woodside Avenue	300,145-square-foot industrial building	Pending entitlement
11	Shadowhill Commercial	Shadowhill Road and Woodside Avenue	6,197 square-foot commercial building	Pending entitlement
12	County Animal Shelter	Riverview Parkway	23,303 square-foot animal shelter	Approved – under construction
13	Woodspring Suites Hotel	8807 Mission Gorge Road	120 guestrooms, 4-story hotel	Approved 9/18/19 – under construction
14	Carlton Oaks Country Club	7200 Inwood Drive	243 residential units and hotel	Pending entitlement
15	All Right Storage	8708 Cottonwood Avenue	Recreational vehicle and self-storage facility	Approved 4/28/21 – not built
16	Prospect Avenue Subdivision	8732 Prospect Avenue	4 single-family homes	Pending entitlement
17	New West Subdivision	9463 Slope Street	11 single-family homes	Approved 4/10/24 – not built
18	Graves Avenue Self- Storage	8355 Graves Avenue	Recreational vehicle and self-storage facility	Pending entitlement
19	Laurel Heights Condominiums	7750 Laurel Heights Drive	80 residential condominium units	Approved 8/11/21 – under construction

Table 3-2. Cumulative Projects

No.	Project Title	Address	Land Use	Status
20	Extra Space Storage	10815 Woodside Avenue	88,390 square-foot (3-story) storage building	Pending entitlement
21	Popeye's	10308 Mission Gorge Road	1,740 square-foot drive-through restaurant	Approved 12/14/22 – under construction
22	Lake Canyon Subdivision	9210 Lake Canyon Road	9 single-family homes	Approved 12/14/22 – not built
23	Atlas View Apartments	8726 Atlas View Drive	10 residential apartments	Pending entitlement
24	Fanita Drive Townhomes	8504 Fanita Drive	8 residential townhomes	Approved 7/12/23 – not built
25	Southwest Signal Building	10756 Rockvill Street	20,000-square-foot industrial building	Approved 10/10/23 – not built
26	Lantern Crest	300 Lantern Crest Way	432-unit congregate care facility with density bonus	Approved 2/22/23 – under construction
27	Fanita Ranch Development	Fanita Ranch	Master-planned community with 2,949 homes	Approved 9/23/20 – not built
28	Paseo	701 Park Center Drive	53 condominium units	Pending entitlement
29	Excel Hotel	381 Town Center Parkway	97 guestroom, 4-story hotel	Approved 4/26/23 – not built
30	Cuyamaca Business Center	9745 Cuyamaca Street	6,280-square-foot medical office building	Approved 3/12/23 – not built
31	Ukrainian Catholic Church	9308 Carlton Oaks Drive	4,400-square-foot church	Approved 11/8/23 – under construction
32	Atlas Cell Phone Tower	10400-CS Fanita Parkway	74-foot cell phone tower at Santee Lakes	Pending entitlement
33	Lutapaj Specialty Food Store	282 Town Center Parkway	2,016-square-foot specialty food and tasting facility	Approved 1/25/24 – not built
34	Cuyamaca/Prospect Starbucks	8606 Cuyamaca Street	1,270-square-foot drive-through coffee shop	Approved 6/12/24 – not built
35	Walmart Housing Site	NW of Mission Gorge Road/ Town Center Parkway	115 residential townhomes	Pending entitlement
36	Santee Auto Center	10335 Mission Gorge Road	Two car dealerships, auto body shop, and car wash	Approved 10/25/23 – under construction
37	Fordyce Construction Office	9735 Prospect Avenue	9,948 square-foot office and contractor storage	Approved 12/9/24

Table 3-2. Cumulative Projects

No.	Project Title	Address	Land Use	Status
38	Habitat for Humanity Townhomes	8932 First Street	17 residential townhomes	Approved 9/27/23 – not built
39	Super Star Car Wash	8837 Magnolia Avenue	4,980 square-foot tunnel car wash	Approved 3/27/24 – not built
40	Aubrey Glen Townhomes	7737 Mission Gorge Road	52 residential townhomes	Pending entitlement
41	Santee Community Center	10123 Riverwalk Drive	Community center, event center, and gymnasium	Approved – not built
42	Cuyamaca Street Right-Turn Pocket	Cuyamaca Street and Mission Gorge Road Intersection	New right-turn-only lane	Approved 3/22/23 – not built
43	Parkvue	Cottonwood Avenue and Walker Trails Drive	358 multi-family residential units	Pending entitlement
44	Soapy Joe's	9015 Mission Gorge Road	Express Car Wash conversion	Approved 1/18/2024 – not built
45	Interim Fire Station	9532 Via Zapador	Fire Station No. 20 relocation	Under construction
46	AT&T Princess Joann Tower	North of Cuyamaca Street and west of Princess Joann Road	Cell tower for AT&T	Pending entitlement
47	Valvoline Instant Oil Change	10463 Mission Gorge Road	Valvoline instant oil change station	Pending entitlement
48	City of San Diego Sycamore Landfill Master Plan Expansion ¹	8514 Mast Boulevard	Expansion of the existing Sycamore Landfill	Approved 12/12/12

Source: City of Santee 2025.

¹ This project is located within the City of San Diego, approximately a mile northwest of the project.

3.0.2.7 Summary of Significant Impacts

This section provides a summary of potential impacts, identifies applicable mitigation, and summarizes what the impacts would be after the implementation of mitigation.

3.0.2.8 References

References are provided for the information contained and cited within the respective EIR section.

3.0.3 References

City of San Diego. 2022. *California Environmental Quality Act Significance Determination Thresholds*. September 2022. Available: https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf. Accessed: March 2024.

City of Santee. 2025. "Active Projects in Santee California." Available: <https://www.cityofsanteeca.gov/business/active-projects-map>. Accessed: January 2025.

3.1 Aesthetics and Visual Resources

3.1.1 Overview

This section describes the existing aesthetic and visual conditions that could be adversely affected by the proposed Carlton Oaks Country Club and Resort Project (project), discusses the applicable laws and regulations related to aesthetics and visual quality, and analyzes the proposed project's effect on (1) scenic vista views; (2) scenic resources along designated State Scenic Highways; (3) compliance with applicable zoning and other regulations governing scenic quality in an urbanized area; and (4) day and nighttime views affected by introducing light or glare. Visual concepts and terminology are presented below.

3.1.1.1 Concepts and Terminology

This section defines the key concepts and terminology used to describe existing aesthetic and visual quality conditions or to describe the change in existing conditions after implementation of the proposed project. Although there may be more than one definition for any of the terms below, these common definitions are used for analytical consistency.

Views refer to visual access and obstruction, or whether it is possible to see a focal point or panoramic scene from an area. Views may be discussed in terms of foreground, middleground, and background. *Foreground* views are those immediately presented to the viewer and include objects at close range that may tend to dominate the view. *Middleground* views occupy the center of the viewshed and tend to include objects that are the center of attention if they are sufficiently large or visibly different from adjacent visual features. *Background* views include distant objects and other objects that make up the horizon. Objects in the background eventually fade to obscurity with increasing distance. In the context of background, the skyline or the ocean can be an important visual feature because objects above this point are highlighted against the background of the sky or water. These “skylined” elements are typically more evident to the viewer because of their inherent contrast.

Visual quality is evaluated based on the relative degree of vividness, intactness, and unity within a landscape, as modified by viewer preference and sensitivity. *Vividness* is the visual power or memorability of landscape components as they combine in striking and distinctive visual patterns. *Intactness* is the visual integrity of the natural and constructed landscape and its freedom from encroaching elements; this factor can be present in well-kept urban and rural landscapes, and in natural settings. *Unity* is the visual coherence and compositional harmony of the landscape considered as a whole; it frequently attests to the careful design of individual components in the landscape. High-quality views are highly vivid and relatively intact and exhibit a high degree of visual unity. Low-quality views lack vividness, are not visually intact, and possess a low degree of visual unity (FHWA 1981).

The following additional definitions pertain to terminology used in visual analysis:

- **Aesthetics** generally refers to the identification of visual resources and the quality of what can be seen, or the overall visual perception of the environment.
- **Viewer sensitivity**, or viewer concern about noticeable changes to views, is based on the visibility of a scenic resource, proximity of viewers to the resource, relative elevation of viewers to the resource, frequency, and duration of views, number of viewers, and types and expectations of the **Viewshed** is all of the surface area visible from a particular location or sequence of locations (e.g., roadway, trail).

In addition to the terms used to describe aesthetics and visual quality, the term *urbanized area* is defined by the State California Environmental Quality Act (CEQA) Guidelines Section 15387 as “a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile.”

3.1.1.2 Existing Character

Project Site

The project site is located in an urbanized area (refer to Section 3.13, Population and Housing, for population information) within the jurisdictions of the Cities of Santee and San Diego. The site is composed of a total of 165 acres containing a 145-acre, 18-hole golf course, a 52-room hotel, and a country club, and it is situated between Carlton Oaks Drive on the north, State Route (SR) 52 on the south, Mast Park West open space on the east, and West Hills Parkway on the west. The golf course spans a length of approximately 7,300 yards just north of SR-52. The hotel and country club are located in the northeastern portion of the project site, abutting residential uses along Carlton Oaks Drive.

The existing visual character of the project site is dominated by the golf course, which features the visual components typical of golf courses, including an irregularly shaped, expansive swath of manicured green grass dotted by sand pits, ponds, and lighter-greens, which are circular, kidney-shaped, or oval putting greens (Figure 3.1-1, Key View Map). Cart and pedestrian paths meander throughout the golf course. In addition, several waterways travel through the project site. Sycamore Canyon Creek crosses under Carlton Oaks Drive and merges with the San Diego River (North Channel). The San Diego River (North Channel) flows through the golf course by traveling westward through the northern portion of the golf course until it merges with the San Diego River (South Channel), near the SR-52 viaduct structure that travels over West Hills Parkway and the San Diego River at the western end of the golf course. The river corridor of the San Diego River (North Channel) is mostly open, with lower-growing grasses, sedges, reeds, and intermittent patches of riparian trees and shrubs. The San Diego River (South Channel) river corridor travels along the southern boundary of the project site, separated from the golf course by a constructed berm, flowing through a more densely vegetated clustering of trees adjacent to SR-52.

As noted above, the existing buildings at the project site comprise several structures within the northeastern area of the site that are clustered around a moderately sized, rectangular-shaped surface parking lot. The hotel is positioned along the southern side of the parking lot and includes a two-story, rectangular wooden structure with a shallow, gabled roof and deep eaves that overhang the exterior walkways of the first and second floors. The building is painted tan and brown, with ochre accents, and has burgundy- or ochre-colored doors. The clubhouse is to the west of the hotel and comprises a single-story building featuring a rectangular main segment with extensions off the front and back. A pool patio is in the front of the building facing north, with a second patio in the back facing the golf course to the south. In addition, four two-unit casitas (i.e., cabins) and one one-unit casita provide additional lodging space on the northern edge of the project site (adjacent to Carlton Oaks Drive). Green lawns separate the casitas from the parking lot and the rest of the country club. The casitas are all single-story wooden structures, resembling houses, and are mostly painted white.

Surrounding Area

The area to the north and northwest of the project site is dominated by a relatively dense suburban development pattern comprising one- to two-story detached single-family homes on moderately sized lots (Figure 3.1-1). The streets are narrow and many end in cul-de-sacs. Two-story, townhouse-style multifamily housing becomes more

prevalent to the northeast, and apartment complexes, as well as neighborhood-serving commercial centers, are farther east, near the intersection of Carlton Oaks Drive and Carlton Hills Boulevard. Single-family housing and mobile-home parks are located south of the project site; however, given that these uses exist on the opposite side of (south of) major transportation corridors, including SR-52 and Mission Gorge Road, these uses are not visually connected to the project site.

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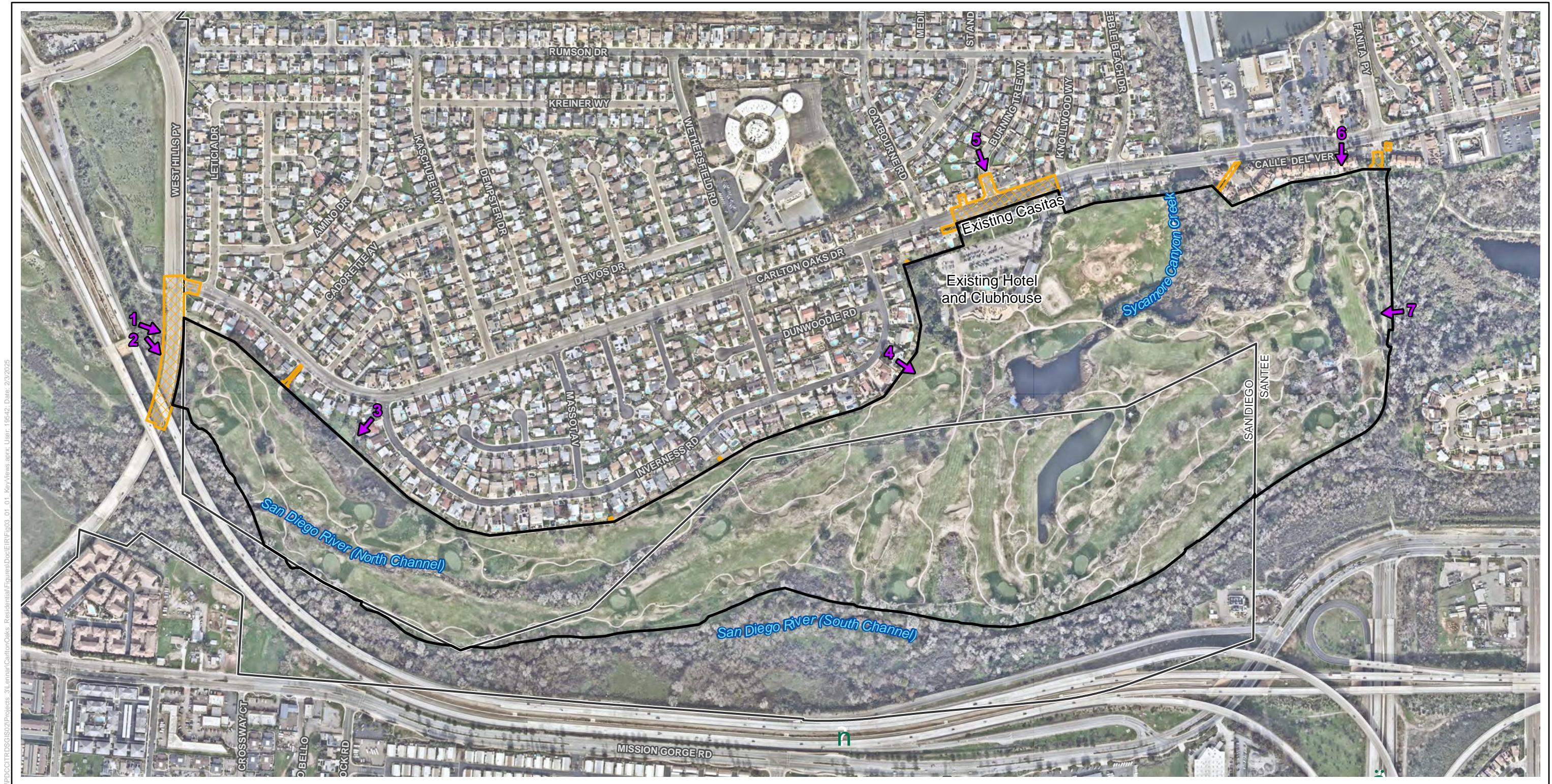


Figure 3.1-1
Key View Map

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3.1.1.3 Designated Scenic Views

The City of Santee's *General Plan* (City of Santee 2003) establishes landforms and views that are important to the community in its *Community Enhancement Element* (City of Santee 2020). General Plan policies identify the high-quality scenic viewsheds available from the western entry into the city from SR-52. In addition, although a specific vantage point is not defined, the *Community Enhancement Element* identifies the flat San Diego River valley and gently sloping areas that transition to the steeply sloped hillsides associated with the surrounding ridgelines as an important visual element of the community. The *Community Enhancement Element* also states that the orientation of the San Diego River corridor creates long views within the City of Santee to the surrounding ridgelines and mountains, such as El Capitan.

The project site falls within the San Diego River valley. A scenic vista of this resource is currently available along a short segment of West Hills Parkway from just south of Carlton Oaks Drive. Closer to the SR-52 overpass, views become obscured by the existing vegetation (i.e., trees). The views available from this segment of West Hills Parkway comprise the golf course and flat river valley in foreground, middleground views that open up to the ridgelines, and mountains in background views.

The City of San Diego relies on community plans to identify important scenic vistas within its various communities. The project site falls within the East Elliott Community Plan area (City of San Diego 2015) in the City of San Diego's *General Plan* (City of San Diego 2008), but no scenic vistas are identified in the Community Plan. However, the project site is also subject to the *San Diego River Park Master Plan* (Park Master Plan) (City of San Diego 2013), which encourages reorientation of development toward the river and providing overlook areas.

3.1.1.4 Scenic Highways

Two officially designated California State Scenic Highways are in the vicinity of the project site: (1) SR-52 between roughly Santo Road to Mast Boulevard; and (2) SR-125 from SR-94 near Spring Valley to Interstate (I) 8 near La Mesa (Caltrans 2019). The segment of SR-52 traverses the Mission Trails Regional Park, and notable scenic features visible from SR-52 include the diverse natural habitat within Mission Trails Summit and Cowles Mountain. The project site is approximately 0.4 mile from the officially designated portion of SR-52. The project site is not visible from this portion of SR-52 because the project site is at a lower elevation than the highway, and the curvature of the highway and intervening vegetation and development prevent views of the golf course. The project site is more than 4 miles away from the portion of SR-125 that is a designated scenic highway, and views of the project site are not visible from this segment of SR-125.

In addition to the officially designated portion of SR-52, the entire length of SR-52 from its intersection with I-5, in the west, to SR-67, in the east, is considered an eligible State Scenic Highway. Although SR-52 runs immediately south of the project site, the project site is largely not visible from SR-52 in either the eastbound or westbound lanes due to intervening trees and shrubs. The primary location of views from SR-52 is at the SR-52 overcrossing of West Hills Parkway, where gaps in the vegetation along the highway exist.

3.1.1.5 Other Public Views to the Project Site

Aside from views from the City of Santee's *General Plan*- and Community Plan-designated vista areas, the principal public viewer groups for the proposed project include motorists and pedestrians within public roadways and rights-

of-way (ROWs) and recreationists using the trails at the adjacent Mast Park West.¹ Recreational trails and public roadways and ROW provide visual access to the project site for these public viewer groups.

Recreational Land Uses

The Mast Park West natural open space area, adjacent to the project site to the east, provides an improved hiking trail along the north side of the San Diego River. In addition, an informal pedestrian trail extends along the southern edge of the project site and connects with West Hills Parkway. This trail is the approximate location of the proposed San Diego Association of Governments (SANDAG)–sponsored Carlton Oaks Golf Course Segment of the San Diego River Trail. Completion of the San Diego River Trail, which includes a Class I bike lane and is intended to provide greater public access to and experience with the San Diego River corridor, would involve fencing along certain portions of the trail to protect trail users from the golf course.

Public Roadways and Rights-of-Way

Carlton Oaks Drive is north of the project site and provides access to the golf course and hotel. However, residential uses separate the project site from Carlton Oaks Drive, and the project site is not visible from this roadway. Inverness Road is also north of the western area of the golf course; similar to Carlton Oaks Drive, residential uses block views of the project site from this public roadway. West Hills Parkway abuts the project site on the west; at off-peak hours vehicles travel along this roadway at a relatively high speed (45 miles per hour [mph]). Foreground and middleground views from both lanes of a short segment of the roadway (approximately 370 feet) consist of the western portion of the expansive green lawn of the golf course that opens into background views of mountains. Although this view is only briefly visible, it provides scenic vista views that are consistent with the City of Santee's *General Plan Community – Enhancement Element* identified in Section 3.12.2, Local (City of Santee 2020). These views include the San Diego River valley in the foreground, the mountains in the background, and few structures interrupting the view. Although housing at the foot of the mountains is visible within the viewshed, it is not an intrusive or prominent component. Given the intactness of this viewshed, the visual quality of this view is considered high. However, as described above, this view is only briefly available for a short distance. In addition, there are no pull-outs nor on-street parking along this segment of West Hills Parkway, and the narrow sidewalk along the eastern side of West Hills Parkway is not heavily used, even though it provides a connection to Carlton Oaks Drive and neighborhoods to the north and to Mission Gorge Road and the apartment complex at the northeastern corner of West Hills Parkway and Mission Gorge Road. The sidewalk does not provide connections to major destinations, such as parks or shopping areas. As such, viewer sensitivity associated with the viewshed from West Hills Parkway is considered moderate.

A brief segment of SR-52 is bridged over West Hills Parkway and the San Diego River valley, west of the project site. At off-peak hours, vehicles can travel along this roadway at a relatively high speed (posted speed of 65 mph). Within this elevated segment of SR-52, eastbound views include prolonged, panoramic vistas of the mountains stretching from the northeast over the project site, where the mountain peaks are visible over the tops of (and occasionally punctuated by) trees, around to the southeast. Except for the tree-tops adjacent to and within the project site, the project site is generally not visible from eastbound SR-52. Given the intactness and unity of panoramic mountain views from the eastbound lanes of SR-52, the visual quality of these views would be considered high. In addition, similar to above, because these views include visual resources identified in the City of Santee's *General Plan* (i.e.,

¹ The term *recreationist* is used to distinguish the subgroup of viewers who organize their recreational activities around experiencing the visual environment from those viewers who are engaged in competitive sports activities. Viewers engaged in most active recreation, such as playing sports, tend to have only an average sensitivity to visual quality and visual change. Although they are aware of their surroundings, they are usually focused on the activity itself, rather than surrounding views.

views from the western entrance to the city from SR-52), viewer sensitivity related to views from eastbound SR-52 would be considered high.

For westbound traffic, passengers of vehicles who are looking to their right would experience pockets of views of the golf course in the foreground and mountains in the background. However, most views from this portion of westbound SR-52 include the trees that abut the roadway to the north, with sporadic views of the mountains to the northwest; many north/northwestern views along this segment are blocked by a dense crop of trees that abuts SR-52 to the north. Broader views of the mountains exist to the south and southwest from the westbound lanes of SR-52. Given the brevity and interruption of the views available from SR-52 looking toward the project site, the visual quality of these views would be considered moderate, and viewer sensitivity to northern and northwestern views from westbound SR-52 would be considered moderate to high. Although the project site exists within the foreground of these views, the project site itself is not visible and is almost entirely obscured by trees. Viewers would be sensitive to interruption of the panoramic mountain views, but sensitivity to views of the existing golf course would be low given that these views are already largely obstructed.

3.1.1.6 Light and Glare

There are two typical types of light intrusion: (1) light emanating from the interior of structures and passing out through windows; and (2) light projecting from exterior sources, such as street, security, and landscape lighting. *Light spillover* is typically defined as the presence of unwanted or misdirected light on properties adjacent to the property being illuminated. Light spillover can be a nuisance to adjacent areas and can diminish views of the clear night sky.

Glare is described as the distraction, discomfort, or impairment of vision caused by extreme contrasts in the field of vision, where light sources (e.g., sunlight, lamps, luminaries, reflecting surfaces) are excessively bright in relation to the general brightness of surroundings. Glare also results from sunlight reflecting off flat building surfaces, with glass typically contributing the highest degree of reflectivity.

On-Site Light and Glare

Light

The project site currently contains security and ambience lighting on the buildings and around the parking lot in the northeastern portion of the project site. In addition, interior lighting from the hotel, cottages, and clubhouse spilling through windows contributes to lighting associated with the project site. The majority of the project site does not contain nighttime lighting because the golf course is unlit. Existing ambient lighting levels at the project site are considered low.

Glare

Existing sources of glare at the project site are minimal. The existing buildings do not have large surfaces of glass; they have wide overhanging eaves, and sunlight reflection off these surfaces would not occur. Other existing sources of glare include sunlight reflecting off vehicles in the parking lot and water, including the swimming pool at the clubhouse, the ponds in the golf course, and the San Diego River (North Channel). Most of these sources would generate a minor amount of glare and existing daytime glare conditions at the project site are considered low.

Off-Site Light and Glare

Light

Most off-site sources of light include exterior security and landscape lighting associated with adjacent residential uses, interior lighting that spills to the outside from residences, vehicle headlights, and street lighting along adjacent roadways, including SR-52, West Hills Parkway, and Carlton Oaks Drive. Given the suburban nature of development in the surrounding area, existing ambient lighting levels are considered moderate.

Glare

Most off-site sources of glare in the project area are limited to sunlight reflecting off surfaces of water, such as swimming pools or the Santee Recreational Lakes, or off the surfaces of vehicles along the roadways and parked at the residential uses adjacent to the project site. However, similar to the project site, most of these sources generate a minor amount of glare, particularly because many of the surface water bodies and parking lots are small in size and are surrounded by trees or fencing that limit glare. Therefore, existing daytime glare conditions surrounding the project site are considered to be low.

3.1.2 Applicable Laws and Regulations

3.1.2.1 State

California Scenic Highway Program

The California Department of Transportation (Caltrans) defines a *scenic corridor* as the “land that is visible from, adjacent to, and outside the highway right-of-way, and is comprised primarily of scenic and natural features. Topography, vegetation, viewing distance, and/or jurisdictional lines determine the corridor boundaries.” Designated scenic corridors are subject to protection, including the regulation of land use, site planning, advertising, earthmoving, landscaping, and design and appearance of structures and equipment (Caltrans 2008, p. 1). California State Streets and Highway Code, Division 1, Chapter 2, Article 2.5, Sections 260–284 establish the following:

The standards for official scenic highways shall also require that local governmental agencies have taken such action as may be necessary to protect the scenic appearance of the scenic corridor, the band of land generally adjacent to the highway right of way, including, but not limited to (1) regulation of land use and intensity (density) of development; (2) detailed land and site planning; (3) control of outdoor advertising; (4) careful attention to and control of earthmoving and landscaping; and (5) the design and appearance of structures and equipment.

A route may be removed for consideration as a scenic route or taken out of the State Scenic Highways program when there has been significant degradation of scenic quality from visual intrusions and changes in visual character. Not more than one-quarter (or 25%) of the scenic highway should be affected by visual intrusions. Examples of visual intrusions that would degrade scenic corridors, as stipulated by Caltrans, and that would apply to the proposed project include extensive cut and fill, dense and continuous development, highly reflective surfaces, scarred hillsides and landscapes, steep slopes with little or no vegetation, exposed and unvegetated earth, and scale and appearance of roadway that are incompatible with landscape. Unsightly land uses would include actions that result in these conditions (Caltrans 2008, pp. 5, 23–25).

3.1.2.2 Local

City of Santee

General Plan

The City of Santee's *General Plan – Conservation Element, Community Enhancement Element, and Land Use Element* contain policies related to visual resources that apply to the proposed project (City of Santee 2020).

Conservation Element

The City of Santee's *General Plan – Conservation Element* (City of Santee 2020) identifies the community's natural and constructed resources and encourages their wise management in order to assure their continued availability for use, appreciation and enjoyment. It is intended to encourage the conservation and proper management of natural resources and open space areas in the City of Santee. The policy in this element pertinent to the proposed project is listed below:

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.

Community Enhancement Element

The City of Santee's *General Plan – Community Enhancement Element* (City of Santee 2020) addresses the interrelationships of citizens and the built environment in terms of scale, design, and sense of community and well-being. It is also concerned with the livability and quality of life within the community. The *Community Enhancement Element* identifies needs within the community to promote high-quality design, revitalization of existing neighborhoods, and maintenance and enhancement of commercial and industrial districts, streets, the river corridors, and parks. In addition, as discussed above, this element identifies the San Diego River valley, the orientation of which offers long views within the City of Santee of the surrounding ridgelines and mountains (e.g., El Capitan) and the gently sloping areas that transition to the steep slopes of the ridgeline systems as important visual resources. Policies of this element pertinent to the proposed project are listed below:

Policy 2.2: The City shall encourage the use of existing natural features (river, hillsides, etc.) as character/theme sources for new residential development.

Policy 3.1: The City shall encourage innovative site planning and housing product designs.

Policy 3.2: The City shall promote the mix of housing product types and site planning features within larger residential developments.

Policy 3.3: The City shall encourage use of varied setbacks, lot orientations and placement of dwelling units.

Policy 3.4: The City shall discourage the overuse of repetitious dwelling unit designs and site planning features.

Policy 3.5: The City shall encourage adaptive housing products and site treatments in hillsides and along the river corridor that respect and enhance the features of the natural environment.

Policy 4.2: The City shall ensure that new residential development are adequately linked to the existing community by streets, sidewalks, trails and bikeways.

Policy 10.1: The City shall preserve the high quality scenic viewshed visible from the western entry along Mission Gorge Road and State Route 52.

Policy 13.2: The City shall ensure that adequate amounts of open space are located along the San Diego River and its tributaries to protect and enhance the river character.

Policy 14.1: The City shall encourage and work with developers to minimize the impacts of grading for new development throughout the City.

Policy 15.1: The City shall require revegetation of graded slopes with indigenous plant materials, where feasible, to maintain scenic views and assist in slope stabilization.

Policy 15.2: The City should provide for the maintenance of view opportunities to surrounding hillsides by ensuring proposed structures do not significantly impact existing community-level viewsheds.

Policy 16.2: The City should promote the introduction of water elements (fountains, streams/canals, ponds, etc.) and riparian plant materials (i.e., Sycamore, 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.

Policy 16.5: The City shall integrate habitat enhancement with recreation opportunities along the San Diego River and its tributaries wherever feasible and practical in meeting recreation and conservation needs.

Land Use Element

The *City of Santee's General Plan – Land Use Element* (City of Santee 2020) designates the project site for Planned Development (PD), Park/Open Space (P/OS), and Low-Medium Density Residential (R-2) uses. Section 8.2 of the Land Use Element includes development guidelines for three areas of Special Study, the Fanita Ranch, Rattlesnake Mountain, and Carlton Oaks Planned Developments, all with PD designations on the Land Use Plan. These guidelines provide a framework to ensure that these unique and significant areas will be developed and preserved with the following:

1. Standards of quality for community appearance and function;

2. Compatibility of development of land and structures that ensures public health, safety and welfare; and
3. Policies that minimize grading, preserve significant biological resources, preserve ridgelines and view corridors, and provide for recreational amenities.

The City of Santee's *General Plan – Land Use Element* identifies Guiding Principles specific to the development of the site. These include the following:

1. The development of the Carlton Oaks Country Club property should focus on mixed use recreation-related development which is oriented towards, and enhances the San Diego River, and is related to other recreation areas within the City.
2. The property should be focused on a high-quality resort and recreation-related uses. Any residential uses should be accessory, and related to the primary recreation use.
3. Ancillary uses, such as restaurants, retail uses, or hotels shall be allowed by Conditional Use Permit if such uses are determined to be ancillary to the existing or planned resort and recreation facilities.
4. Use of the site should orient to, and be compatible with the San Diego River.
5. Development should respect the river environment, including protection of the riparian habitat and protected species.
6. Development should protect natural drainage, and ensure protection of water quality.
7. A multipurpose, public trail shall be provided on the property on the north side of the San Diego River, linking with existing and planned trails to the east and west of the site.

Santee Municipal Code

Santee Municipal Code Sections 13.16.040, 13.19.030, and 13.10.040 establish development standards for P/OS, PD, and R-2 districts, respectively. As indicated in the Municipal Code, development standards related to site dimensions, height limitations, and setbacks are determined on a site-by-site basis for P/OS districts. Section 13.16.040(B) (Development Criteria) for P/OS districts provides a number of criteria for development within the P/OS districts. However, consideration shall be given to surrounding properties and developments in order to blend and remain consistent with the area. In addition, Section 13.19.030 specifies that PD districts be consistent with the guidelines contained in the Land Use Element of the *General Plan* for each respective PD-designated property (identified above for the project site) and identifies that all development standards will be established through a development-review permit. The development standards for the residential development within the PD zone will be established through the development-review permit request, and they are included as Appendix S, Planned Development District Standards.

Santee Municipal Code Section 13.30.030(B) establishes lighting standards for the City of Santee. These standards state that all lighting must be designed and adjusted to reflect light away from any road or street, and away from adjoining properties. All lights and illuminated signs must be shielded or directed so as to not cause glare on adjacent properties or to motorists.

City of San Diego

General Plan

The City of San Diego's *General Plan – Urban Design Element* provides guidance for development related to visual quality (City of San Diego 2006) and includes citywide design goals and policies regarding visual elements that

complement the goals for pedestrian-oriented and walkable villages from the City of Villages strategy.² The *Urban Design Element* also addresses urban form and design through policies aimed at respecting the natural environment, preserving open space systems, and targeting new growth into compact villages. With the exception of a small portion of the driveway that would be constructed off of West Hills Parkway to provide access to Residential West, only proposed golf course renovations would be located within the City of San Diego. Policies relevant to the project are listed below:

Policy UD-A.1: Preserve and protect natural landforms and features.

Policy UD-A.2: Use open space and landscape to define and link communities.

Policy UD-A.3: Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.

Policy UD-A.6: Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.

Policy UD-A.10: Design or retrofit streets to improve walkability, bicycling, and transit integration; to strengthen connectivity; and to enhance community identity. Streets are an important aspect of Urban Design as referenced in the Mobility Element.

Policy UD-A.13: Provide lighting from a variety of sources at appropriate intensities and qualities for safety.

Policy UD-B.1: Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.

Policy UD-B.4: Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.

Policy UD-B.5: Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.

- a. Design or retrofit street systems to achieve high levels of connectivity within the neighborhood street network that link individual subdivisions/projects to each other and the community.
- b. Avoid closed loop subdivisions and extensive cul-de-sac systems, except where the street layout is dictated by the topography or the need to avoid sensitive environmental resources.
- c. Design open ended cul-de-sacs to accommodate visibility and pedestrian connectivity, when development of cul-de-sacs is necessary.
- d. Emphasize the provision of high quality pedestrian and bikeway connections to transit stops/stations, village centers, and local schools.

² The City of Villages strategy focuses growth into mixed-use activity centers that are pedestrian-friendly districts linked to an improved regional transportation system. Each village center is the mixed-use heart of its neighborhood or larger community. These neighborhood and community villages are envisioned to have a highly integrated mixture of uses, accessible and attractive streets, and public spaces (City of Santee 2020).

- e. Design new streets and consider traffic calming where necessary, to reduce neighborhood speeding.
- f. Enhance community gateways to demonstrate neighborhood pride and delineate boundaries.
- g. Clarify neighborhood roadway intersections through the use of special paving and landscape.
- h. Develop a hierarchy of walkways that delineate village pathways and link to regional trails.
- i. Discourage use of walls, gates and other barriers that separate residential neighborhoods from the surrounding community and commercial areas.

Policy UD-C.7: Enhance the public streetscape for greater walkability and neighborhood aesthetics.

- a. Preserve and enhance existing main streets.
- b. Establish build-to lines, or maximum permitted setbacks on designated streets.
- c. Design or redesign buildings to include architecturally interesting elements, pedestrian friendly entrances, outdoor dining areas, transparent windows, or other means that emphasize human-scaled design features at the ground-floor level.
- d. Implement pedestrian facilities and amenities in the public right-of-way including wider sidewalks, street trees, pedestrian-scaled lighting and signs, landscape, and street furniture.
- e. Relate the ground floor of buildings to the street in a manner that adds to the pedestrian experience while providing an appropriate level of privacy and security.
- f. Design or redesign the primary entrances of buildings to open onto the public street.

East Elliott Community Plan

The primary goal established in the *East Elliott Community Plan* as it relates to the visual/scenic quality of the project is to implement the Park Master Plan. The *East Elliott Community Plan* designates the City of San Diego portion of the project site for open space uses (City of San Diego 2015).

San Diego River Park Master Plan

The *Park Master Plan* uses five principles to inform the plan (City of San Diego 2013): (1) restoring and maintaining a healthy river system; (2) unifying fragmented lands and habitats; (3) creating a connected continuum with a sequence of unique places and experiences; (4) revealing the river valley history, and (5) reorienting development toward the river to create value and opportunities for people to embrace the river. The *Park Master Plan* focuses on the 17.5-mile segment of San Diego River within the boundaries of the City of San Diego, extending from the Pacific Ocean to the city limits shared with the City of Santee, and includes the corridor extending 0.5 miles on each side of the river. This corridor has been divided into six reaches, for which design guidelines have been established, with the project site located in the Plateau Reach. The Park Master Plan identifies the Plateau Reach as an area of the San Diego River corridor that provides expansive views to the hills above the City of Santee and to the distant mountains in the Cleveland National Forest, but it states that the river along this stretch is affected by physical constraints, including the constructed berm on the northern side of the San Diego River (South Channel), which separates the river from the golf course, and SR-52 to the south of the river. The plan identifies the existing informal hiking trail on top of the berm as a potential site for the San Diego River Trail. SANDAG has since formalized the location of this segment of the San Diego River Trail within Santee. A Final Initial Study/Mitigated Negative Declaration (MND) was prepared to address any potential environmental effects related to the construction of the pathway (SANDAG 2017). The SANDAG project would involve constructing a segment on, or adjacent to, the existing berm along the golf course's southern edge and

the river's northern edge. It would consist of a 10-foot-wide, all-weather, paved surface with 2-foot-wide pervious shoulders and split-rail fencing on each side. The existing berm would be improved by expanding, rebuilding, and/or reinforcing areas necessary to support the proposed bike path. Slope protection or similar measures to control erosion would be installed at locations within this segment on the southern side of the bike path in slope areas where erosion is evident (SANDAG 2017).

Although the proposed San Diego River Trail is not a part of the proposed project, the proposed project has the potential to affect the proposed trail because of its proximity to the project site. The Park Master Plan identifies the following recommendations for the Plateau Reach (City of San Diego 2013):

- A. Coordinate with Caltrans to identify potential alignment and methods to create the San Diego River Trail under State Highway 52.
- B. Through a feasibility study and an associated environmental document determine the best location for the San Diego River Park Trail connecting Mission Trails Regional Park to the City of Santee, along with connections to West Hills Parkway. Include in the study where a soft surface trail could be provided separate from the paved pathway to accommodate a variety of users.
- C. Initiate a dialogue with Carlton Oaks Golf Course to explore the potential to evolve the golf course edge into a naturalized landscape buffer with native plant species and a vegetation management plan that removes exotic plants. The buffer should be designed to provide habitat, as well as an infiltration device to treat the golf course surface runoff before it goes into the river.
- D. Look at opportunities to restore the natural open space adjacent to the river if the golf course were to change in the future and the site is redeveloped into a new use.
- E. Provide a kiosk at the boundary of the City of San Diego and the City of Santee that identifies the eastern entrance of the San Diego River Park.

As noted above, the *Park Master Plan* identifies a potential alignment for the San Diego River Trail along the southern side of the golf course and recommends that the open space corridor through which the river flows be expanded in order to provide an adequate width to recontour the river channel, thus allowing increased river length and meander, increased riparian habitat, and runoff buffering at the golf course.

San Diego Municipal Code

General Development Regulations

The City of San Diego's General Development Regulations (Municipal Code Chapter 14, Article 2) contain numerous provisions to guide the design of development throughout the city, including development restrictions and guidelines to protect and enhance environmentally sensitive lands (ESLs). The ESL Regulations (Sections 143.0101 et seq.) establish development regulations for sensitive biological resources. The Land Development Code (Sections 142.0101 et seq.) also contains grading regulations to address landform preservation and requires that all grading be designed and performed in conformance with applicable City Council policies and the standards established in the *Land Development Manual* (City of San Diego 2004).

Off-Site Development Impact Regulations

The purpose of the *Off-Site Development Impact Regulations* (Municipal Code Chapter 14, Article 2, Division 7) is to minimize negative impacts on surrounding properties from adjacent development. These regulations include

standards for minimizing glare and light impacts. However, the *Glare Regulations* (Municipal Code Section 142.0730) do not apply because no buildings would be constructed in the City of San Diego under the proposed project.

Lighting within the City of San Diego is controlled by the Municipal Code Section 142.0740 (Outdoor Lighting Regulations), which are intended to provide public safety, conserve energy, and protect surrounding land uses and astronomy activities at the Palomar and Mount Laguna Observatories from excessive light generated by new development. The project is not located within 30 miles of the Palomar and Mount Laguna Observatories; therefore, regulations pertaining to these observatories are not applicable.

3.1.3 Project Impact Analysis

3.1.3.1 Methodology

Aesthetic experiences can be highly subjective and vary from person to person; therefore, when feasible, it is preferable to evaluate aesthetic resources using a process that strives to objectively identify the visual features of the area, their importance, and the sensitivity of the associated viewers. The proposed project-related changes to the aesthetic character of the project site and surrounding area are identified and qualitatively evaluated based on the extent of the modification to the existing physical conditions and based largely on viewer sensitivity to the modification.

Viewer sensitivity is based on the visibility of a scenic resource, the proximity of viewers to the resource, the relative elevation of viewers to the resource, the frequency and duration of views, the number of viewers, and the types and expectations of the individuals and viewer groups. Generally, visual sensitivity increases as the total number of viewers, frequency, and duration of viewing activities increases.

The degree of visual sensitivity is treated as occurring at one of the following four levels:

- **High Sensitivity** suggests that the majority of the public is likely to react strongly to a threat to visual quality. A highly concerned public is assumed to be more aware of any given level of adverse change and is substantially less tolerant than a public that has little to moderate concern. A small modification of the existing landscape may be visually distracting to a highly sensitive public and represent a substantial reduction in visual quality.
- **Moderate Sensitivity** suggests that the public would probably voice concern over substantial visual impacts. Often, the affected views are secondary in importance or are similar to others commonly available to the public.
- **Low Sensitivity** is considered to prevail where the public is expected generally to have little concern about adverse changes in the landscape, or only a small minority may be expected to voice such concern, even where the adverse change is substantial in intensity and duration.
- **No Sensitivity** occurs when the views are not public, or there are no indications of public concern over, or interest in, scenic/visual resource impacts on the affected area.

An evaluation of the project site and the potentially affected environs, along with a review of public scoping comments, served to identify indicators of public sensitivity to changes to views. An analysis of the surrounding area was also conducted to identify areas where the proposed project would be most visible and to assess the quality of public views of the project site. The range and quality of public views of the project site was determined

by reviewing street maps and designated vista areas in the General Plans, reviewing photos of areas in or adjoining the project site, reviewing street-level imagery on Google Earth, and a site visit. In addition, photo simulations have been prepared to help illustrate “before” and “after” conditions to aid in the evaluation of project impacts. Representative photos of the key views associated with the project site and project area are mapped in Figure 3.1-1, and the photos and respective simulations of the project are provided in Figures 3.1-2 through 3.1-8. Typically, photosimulations are not conducted from private views (e.g., backyards); however, due to comments from nearby residents during the notice of preparation public scoping period, some of the photosimulations were taken from private backyards for informational purposes. As shown on Figure 3.1-1, key views were located along the perimeter of the project site as these locations were determined to have the greatest potential to experience visual change associated with development of the project. However, due to proximity to the project site and height and/or location of proposed development associated with the Residential West, Residential North, and Hotel and Clubhouse components, views to the project from selected key view locations would generally be limited to components nearest to the northern boundary of the project site. Components located more interior to the project site (including the proposed steel bridge that would extend south and east from the Residential North component and span the San Diego River) would typically be blocked from view at the nearest key view locations by intervening development.

Project Design Features

The project proponent would implement the following project design features (PDFs) to help reduce aesthetic and/or visual impacts (the full text of these PDFs can be found in Chapter 2, Project Description):

- PDF-13: Stormwater Pollution Prevention Plan (SWPPP)
- PDF-14: Stormwater Quality Management Plan (SWQMP)
- PDF-15: Scour and Erosion Prevention Measures
- PDF-16: Security Fence Coloring

Key View 1. Existing



Key View 1. Simulation



View from West Hills Parkway looking east toward Residential West.

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Source: Hunsaker & Associates San Diego Inc., 2025.

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Figure 3.1-2
Key View 1, Existing and Proposed Conditions

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Key View 2. Existing



Key View 2. Simulation



View from West Hills Parkway looking southeast toward Residential West.

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Source: Hunsaker & Associates San Diego Inc., 2025.

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Figure 3.1-3
Key View 2, Existing and Proposed Conditions

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Key View 3. Existing



Key View 3. Simulation



View from 8359 Carlton Oaks Drive looking southwest toward Residential West from edge of the resident's back property line.

Source: Hunsaker & Associates San Diego Inc., 2025.

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Key View 4. Existing



Key View 4. Simulation



View from 9227 Inverness Road looking southeast toward Residential North.

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Source: Hunsaker & Associates San Diego Inc., 2025.

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Figure 3.1-5
Key View 4, Existing and Proposed Conditions

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Key View 5. Existing



Key View 5. Simulation



View from Carlton Oaks Drive looking south toward the entrance for Carlton Oaks Country Club and Resort at Residential North.

Source: Hunsaker & Associates San Diego Inc., 2025.

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Key View 6. Existing



Key View 6. Simulation



View from Vista Del Verde Condominiums looking south toward the pro shop and learning center.

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Source: Hunsaker & Associates San Diego Inc., 2025.



Figure 3.1-7
Key View 6, Existing and Proposed Conditions

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Key View 7. Existing



Key View 7. Simulation



View from public trail in Mast Park to the east of the project site looking west.

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Source: Hunsaker & Associates San Diego Inc., 2025.

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Figure 3.1-8
Key View 7, Existing and Proposed Conditions

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3.1.3.2 Thresholds of Significance

The following significance criteria are based on State CEQA Guidelines Appendix G and provide the basis for determining the significance of impacts associated with aesthetics and visual quality that could result from the proposed project. Impacts are considered significant if the proposed project would result in any of the following:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.
3. In nonurbanized 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 or other regulations governing scenic quality.
4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

3.1.4 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the proposed project have a substantial adverse effect on a scenic vista?

Impact Discussion

Construction

The proposed project includes the redesign of the existing Carlton Oaks Golf Course to include two residential neighborhoods with open space areas; a hotel and associated cottages; an improved golf course clubhouse, pro shop, and learning center structure; the modified golf course and practice area; the proposed Project Trail Segments and potential supplemental trail offer of dedication; and off-site project improvements. Construction of the proposed project may be visible from surrounding areas, including SR-52, West Hills Parkway, and the existing trail abutting the project site to the south.

Site-preparation activities would include demolishing existing buildings and features that need to be removed (i.e., clubhouse, restaurant/bar, pro shop, hotel and hotel cottages, and surface parking lots), removing some existing vegetation, installing utilities, and grading the site.

Construction activities associated with the project components would consist of building roads, sidewalks, pathways, trails and trail segments, structures, and golf course features and installing associated landscaping and lighting features. These actions would involve construction equipment, earthwork, and debris, as well as trucks to bring in construction supplies and fill material and haul the debris off site for recycling and disposal. Grading and paving equipment and activities would be visible during the creation of the pads for the project's structures. In general, these actions would not block views of scenic vistas from surrounding areas, the equipment would come and go in the public view, and all would be present for only a short period of time. In addition, renovation of the golf course, likewise, would not block a scenic vista. Bare earth may be visible in some views, due to grading activities. However, the ground plane and associated earthwork and exposed soils would not affect scenic vista views because they would occur on the ground, and intervening vegetation and development would preclude, or greatly limit, most views of exposed soil. However, features such as landscaping, geotextile turf, and hardscape elements to disperse

or dissipate water flow would be installed during construction to ensure that the project includes temporary and permanent sediment- and erosion-control measures implemented through implementation of PDF-13 (SWPPP), and PDF-14 (SWQMP). In addition, the project would incorporate best management practices (BMPs) and site design–performance standards from the City of Santee and City of San Diego Jurisdictional Runoff Management Plans (JRMPs) and measures to prevent erosion along the river as specified in PDF-15 (Scour and Erosion Prevention Measures). (The full text of all PDFs noted herein can be found in Chapter 2, Project Description.) In addition, it is expected that areas of bare soils would be vegetated upon completion of construction of each relevant phase. For example, the golf course would be landscaped upon completion of Phase 5 and the residential areas would be landscaped upon completion of Phase 7. Therefore, the presence of exposed soils would dwindle as construction progresses toward completion, and features constructed as part of the project (e.g., residences) would block and limit views toward other areas where exposed soil could still be present. Construction fencing may be used along West Hills Parkway during construction of the western residential area, which would interfere with existing views of the San Diego River valley and the distant mountains from this roadway. In addition, construction would not be permanent and would last less than 4 years, and this view is only briefly available along a short stretch of West Hills Parkway before trees obscure the view. Therefore, views of construction within this brief scenic vista are not expected to result in substantial impacts, given the short distance, the speed at which vehicles travel along this roadway (45 mph during non-peak hours), and transitory nature of this view. In addition, the adjacent sidewalk along the eastern side of West Hills Parkway is not heavily used, and viewers would see it only briefly while walking past. As such, construction activities would not result in a substantial adverse effect on a scenic vista, and impacts would be less than significant.

Operation

As discussed in Section 3.1.1.3, Designated Scenic Views, the City of Santee has identified eastern views of the mountains through the San Diego River valley and views from SR-52 at the western entrance to the city as important scenic vistas in the community. The project site is in the San Diego River valley, and views of the San Diego River valley and the eastern mountains are available through the project site from West Hills Parkway and SR-52. The proposed project would involve rebuilding uses that are currently on the site, including the improved hotel with cottages, clubhouse, and pro shop. In addition, the golf course and practice area are existing features that would be reconfigured during construction. The proposed project would also involve development of uses not previously on the site, which include the new residential uses and learning center structure, which would introduce new components into the abovementioned viewsheds.

Residential development would include construction of 86 two-story detached multifamily residential units within the westernmost portion of the project site (i.e., Residential West), which would abut and be accessed from West Hills Parkway (see Figure 2-3, Proposed Site Plan, in Chapter 2, Project Description). An additional 150 detached multifamily residential units would be constructed in the northern portion of the project site (i.e., Residential North), in the area currently occupied by the hotel, clubhouse, and parking lot.

SR-52 is elevated as it enters the City of Santee and crosses Mast Boulevard and West Hills Parkway, and viewers from the SR-52 westbound viaduct structure would look over the project site, not through it. Due to the westbound viaduct structure and trees growing along the San Diego River (South Channel), views of the project site from the eastbound viaduct structure are very limited. Ridgelines associated with the scenic vista views from SR-52 are located, predominantly, to the east, southeast, south, southwest, and west. Introduction of the residential components into available views from SR-52 would not affect the existing panoramic views of mountains because the development would be north of SR-52, would not exceed two stories in height, and would be at a lower elevation than the viaduct structures. Therefore, the development would not interfere with or obscure views of the ridgelines

associated with scenic vista views. Rather, the new housing would appear as an extension of the existing adjacent residential uses. Therefore, impacts on public views from SR-52 from the proposed project would be less than significant.

Regarding alteration of scenic vista views from West Hills Parkway, as discussed above, this view is only available for roadway users and pedestrians using the sidewalk briefly, and in passing, for a short distance. Because the site curves northward in the eastern portion, Residential North would not be visible from this roadway and would have no effect on these views. However, as shown in the existing view for Key Views 1 and 2 in Figures 3.1-2 and 3.1-3, respectively, no existing structures are associated with the golf course within this viewshed, and the view only contains the open grass and putting greens associated with the golf course. However, views of the golf course are limited by the trees bordering West Hills Parkway. Similarly, trees located between the golf course and existing residential areas to the north act to limit views toward the future houses associated with this residential area. Additionally, landscape screening would be provided at existing homes adjacent to Residential West, if desired by the property owner. As seen in the simulations, Residential West would introduce 86 two-story homes into this view and completely block all existing views of the golf course and existing residential areas seen from West Hills Parkway. However, landscaping installed as part of the proposed project would visually buffer views of the structures associated with Residential West from this vantage so that the development would not create a visual distraction in the foreground of this scenic vista view. Furthermore, the proposed development and landscaping would maintain views of the ridgelines in the background and would not obscure these views. Based on the above, the proposed Residential West would have a less-than-significant impact on this scenic vista.

The proposed project would also involve rebuilding the new hotel with cottages, clubhouse, pro shop, and the reconfigured golf course and practice area. The existing structures are not visible above the vegetation to the north of SR-52 and, even in the winter, it is hard to distinguish these structures through the bare tree branches. None of the proposed features would exceed the height of the existing structures seen from SR-52, so they would not be visible above the existing vegetation to the north of SR-52, and they would appear very similar to the existing structures that are minimally visible through bare tree branches. Therefore, these proposed structures would not result in substantial obstruction nor interference with the existing scenic vista views. Although the golf course is slightly visible from westbound SR-52, the proposed improvements would also look very similar to the existing golf course and would not negatively affect existing views. These features also would not be visible from West Hills Parkway beyond Residential West. Therefore, impacts on scenic vistas related to the golf clubhouse and hotel and the golf course would be less than significant.

In addition to the on-site project changes, the project would require the installation of four new utility poles that would be up to approximately 45–55 feet in height and located in the off-site improvement areas to the north of the project site. Two utility poles would be placed within the public ROW on Carlton Oaks Drive, and one utility pole would be placed in the public ROW on Burning Tree Way. In addition, an existing stub pole and anchor would be removed from the ROW in front of 8726 Carlton Oaks Drive, and a new utility pole would be placed on the southeastern portion of that driveway. Alternatively, another option may be considered to re-feed the home located at 8726 Carlton Oaks Drive via a trench from the converted underground system on the south side of Carlton Oaks Drive to the southeast corner of the home and place a trench and conduit up the driveway to the easterly side of the house to tie into the existing weather head on the roof of the home. Telecommunication and cable services would require conduit/cable running upward on the outside of the exterior wall to maintain the overhead points of connection to the home. This alternative option would be less visible since the utility lines would be underground and the number of utility poles required would be reduced from four to three; however, the new utility poles would not be located in an area where scenic vista views are present. In addition, the new utility poles would be located

adjacent to existing poles that are of the same heights; therefore, the new poles would not stand out in scenic vista views associated with West Hills Parkway or SR-52.

Features on the ground plane, such as roadways, sidewalks, and the proposed Project Trail Segments and supplemental trail offer of dedication, would not affect scenic vista views because they would be built on the ground, and intervening vegetation and development would preclude, or greatly limit, views of these features when seen from the SR-52 westbound viaduct structure. The proposed Project Trail Segment would vary in width from 6 to 10 feet. At highway speeds, very briefly visible roadways, sidewalks, and trails would not be focal points in passing views. Similarly, visible roadways, sidewalks, and trails seen in scenic vista views from West Hills Parkway would not be focal points of passing viewers, but rather more dominated by structures and landscaping. Safety fencing, approximately 10 feet tall, would be constructed along the Project Trail Segment adjacent to the golf course. If grey, untreated fencing (e.g., chain link or metal fencing) were used, then there would be the potential for the fencing to stand out and detract from views.

Impact Determination

Implementation of the proposed project could have a substantial adverse effect on a scenic vista because of proposed safety fencing along the Project Trail Segment. This could occur if grey, untreated fencing (e.g., chain-link or metal fencing) were used, as there would then be a potential for the fencing to stand out and detract from views because the grey coloring is more pronounced and acts more as a visual barrier. The proposed project would include PDF-16, Security Fence Coloring, to preclude potential impacts associated with untreated safety fencing.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would implementation of the proposed project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?

Impact Discussion

Construction

As discussed in Section 3.1.1.4, Scenic Highways, the nearest officially designated State Scenic Highway to the project site is a segment of SR-52 that travels through Mission Trails Regional Park (roughly from Santo Road in the west to almost to Mast Boulevard in the east). Important scenic features along this scenic highway include the open-space system of Mission Trails Regional Park that preserves San Diego's diverse natural history, the Mission Trails Summit, and Cowles Mountain. The nearest portion of this segment is approximately 0.4 miles west of the project site. However, the project site is not visible from this portion of SR-52 because the project site is located at a lower elevation than the highway, and the curvature of the highway and intervening vegetation and development prevent views of the golf course. Therefore, there would be no visual intrusions associated with this project along any length of officially designated State Scenic Highway portions of SR-52, and there would be no impact.

In addition to the officially designated State Scenic Highway portion of SR-52, the entire length of SR-52—from its intersection with I-5, in the west, to SR-67, in the east—is considered an eligible State Scenic Highway. Although SR-52 runs immediately south of the project site, the project site is largely not visible from SR-52 in either the eastbound or westbound lanes because of intervening mature trees and shrubs, most of which parallel the state route between approximately Mast Boulevard on the west to Carlton Hills Boulevard on the east. The primary location where views from SR-52 exist is at its overcrossing of West Hills Parkway, where narrow gaps in the vegetation along the highway occur.

Views of construction of the Residential West areas, including the associated proposed Project Trail Segment and supplemental trail offer of dedication, within the narrow and very brief duration viewing “window” along the state route where the prevailing speed during non-peak periods is approximately 60 mph would not result in substantial impacts to scenic resources. As shown on Figure 2-3, mature trees paralleling SR-52 would be retained (trees nearest to the state route are located outside the delineated project site) and would continue to create mostly blocked views to the project site from SR-52. Where momentary project views are available at the West Hills Parkway overcrossing, the removal of existing, mostly ornamental trees in the immediate foreground of the views and along the northern limits of the project site would be visible and experienced by passing motorists. The removal of these features in views could improve visibility to long-distance mountainous terrain to the east-northeast and would not alter the quality of views to prominent mountain terrain located to the south of SR-52.

In addition to limited tree removal, bare earth resulting from grading activities on the project site may be visible in this view. However, the ground plane and associated earthwork and exposed soils would not substantially affect scenic views from the state route because project activities would occur on the ground, and intervening vegetation and development would preclude, or greatly limit, views of exposed soil. Features such as landscaping, geotextile turf, and hardscape elements to disperse or dissipate water flow would be installed during construction to ensure that the project includes temporary and permanent sediment- and erosion-control measures implemented through PDF-13 (the SWPPP), PDF-14 (SWQMP) that would incorporate the Cities of Santee’s and San Diego’s JRMP BMPs and site design–performance standards, and measures to prevent erosion along the river (PDF-15, Scour and Erosion Prevention Measures). In addition, it is expected that areas of bare soils would be vegetated upon completion of construction of each relevant phase. For example, the golf course would be landscaped upon completion of Phase 5 and the residential areas would be landscaped upon completion of Phase 7. Therefore, the presence of exposed soils would dwindle as construction progresses toward completion, and features constructed as part of the project (e.g., residences) would block and limit views toward other areas where exposed soil could still be present.

Construction of the improved hotel with cottages, clubhouse, and pro shop would not negatively affect available views from eligible portions of SR-52 because the area identified for hotel and clubhouse development is not currently visible in the narrow viewing “window” to the project site from SR-52 at the West Hills Parkway overcrossing. Further, removal of existing vegetation on the project site to accommodate the Residential West development would not create a viewing corridor to the hotel and clubhouse development area, and because most existing mature trees paralleling the SR-52 in the immediate project area would be retained, views to the hotel and clubhouse development would not be available from other segments of the state route located east of the West Hills Parkway overcrossing.

Where trees paralleling the state route would be removed (such as near the West Hills Parkway overcrossing of SR-52), these trees would be mostly ornamental species, as opposed to the native, riparian species that consistently line the southern banks of the San Diego River in the project area and, along with the area’s rugged mountainous terrain, contribute scenic qualities to the local landscape. The removal of trees located on the project site would

also not alter or degrade existing views to the predominant scenic resources along the designated scenic segment of SR-52 (hillsides and mountainous terrain). Therefore, construction activities associated with the proposed project would not be notable when seen from eligible portions of SR-52 and construction activities would not substantially damage scenic resources within a state scenic highway. Impacts would be less than significant.

Operation

As noted above under Construction, the proposed project would not be visible from the segment of SR-52 that is officially designated as a State Scenic Highway. In addition, the proposed project would neither damage nor remove any particular prominent scenic resources that are visible from SR-52, including the area's rugged mountainous terrain. Once built, landscaping installed as part of the proposed project would, over time, mature and partially screen views of the Residential West development that would be available from SR-52. Proposed Residential West development and landscaping as viewed from West Hills Parkway is depicted in the simulations for Key Views 1 and 2, in Figures 3.1-2 and 3.1-3, respectively. Additionally, landscaping provided at existing homes adjacent to Residential West, if desired by the property owners, would further screen/partially screen views of the Residential West development from viewers on West Hills Parkway and nearby segments of SR-52. While views to residences, landscaping, and other nearby project components located along the western project site boundary may be available to SR-52 motorists near the West Hills Parkway overcrossing, the available views would be fleeting (lasting a matter of seconds) and would generally occur through gaps in vegetation (mature trees) adjacent to the state route. Further, the removal of select existing trees, development of the Residential West area, and installation of associated landscaping would not alter or otherwise substantially damage mature riparian trees located along the southern bank of the San Diego River (and north of SR-52) or the rugged hillsides and mountains that are visible along the SR-52 corridor. Project operations and, more specifically, the presence of Residential West development and associated landscaping, would not obscure views to these features that are available from SR-52. Furthermore, Residential North, the new hotel with cottages, clubhouse, pro shop, the reconfigured golf course and practice area, and the proposed Project Trail Segment (East), including its associated safety fencing, and supplemental trail offer of dedication, would not be visible above the dense vegetation canopies located to the north of SR-52 and, even in the winter, project components would be hard to distinguish through the bare tree branches. Where visible through narrow gaps in existing vegetation along the SR-52 corridor, components of the proposed project would appear similar to the existing nearby structures in the landscape (i.e., residences) and anticipated project visibility would not substantially alter the existing scenic qualities present within the viewshed of SR-52.

In addition to the on-site project changes, the project would require the installation of up to four new utility poles that would be up to approximately 45–55 feet in height and located in the off-site improvement areas to the north of the project site. The new utility poles would be located adjacent to existing poles that are of the same heights, and they would not stand out in available views from SR-52.

As detailed above, the proposed project would not result in substantial obstruction, nor interference with the views available from eligible portions of SR-52. The proposed project would also not introduce any visual intrusions that could affect its eligibility to become an officially designated State Scenic Highway. Project development would not result in substantial damage to scenic resources that are present within the viewshed of designated (and eligible) scenic segments of SR-52 that are located near the project site. Thus, impacts related to damage or removal of scenic resources within a State Scenic Highway would be less than significant.

Impact Determination

Implementation of the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: In nonurbanized areas, would implementation of the proposed 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 point.) In urbanized areas, would implementation of the proposed project conflict with applicable zoning and other regulations governing scenic quality?

Impact Discussion

According to CEQA Statute Section 21071, the project site meets the definition of an urbanized area.³ Therefore, this analysis focuses on whether the project would conflict with applicable zoning or other regulations governing scenic quality. Changes related to light and glare, including compliance with policies, are discussed under Threshold 4.

City of Santee

The City of Santee classifies the project site as PD, P/OS, and R2 zones. Within the R2 zone, the project proposes the following: (1) public ROW vacation for the existing Inwood Drive and revised driveway access to the existing home at 9225 Inwood Drive (no changes to the existing structure are proposed); and (2) construction of one single-family home on a minimum of 6,000-square-foot lot that would be consistent with the underlying R2 zone. The PD designation is used in areas where a variety of development opportunities may be viable and where the City of Santee wants to encourage innovative and high-quality development in a manner that may not be possible under standard land use designations. As such, this designation allows for some flexibility in site/building design and land use. The development standards for the residential development within the PD zone were established through development-review permit DR-2019-5 and are included as Appendix S, Planned Development District Standards. The proposed project conforms to these development standards.

The City of Santee's *General Plan – Community Enhancement Element* (City of Santee 2020) contains policies pertaining to scenic resources that respect and enhance the features of the natural environment, preserve the high-quality scenic views from SR-52, require revegetation of graded slopes with native plant materials, and maintain views to the surrounding hillsides by ensuring that proposed structures do not significantly affect existing

³ CEQA Statute Section 21071 defines an *urbanized area* as an incorporated city that has a population of at least 100,000 persons, or has a population of less than 100,000 person if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons. The U.S. Census Bureau estimates Santee's 2022 population to be 59,051 (U.S. Census Bureau 2023); however, Santee's city limits abut those of the incorporated cities of San Diego and El Cajon, both of which have populations exceeding 100,000 persons. Therefore, the project site meets the definition of an urbanized area.

community-level viewsheds. More specifically, the City of Santee's *General Plan – Land Use Element* identifies that the Carlton Oaks Country Club property should focus on a high-quality resort and recreation-related uses, whereas residential uses should be ancillary to the existing or planned resort and recreational facilities, and that development must be compatible with and protect San Diego River (City of Santee 2020). Santee Municipal Code identifies that: (1) site dimensions, height limitations, and setbacks are determined on a site-by-site basis for the P/OS zone; (2) that all development standards will be established through a development-review permit, minor conditional use permit, or a conditional use permit for the PD zone; (3) that alterations to the natural landforms must be minimized, development must be consistent with the guidelines contained in the Land Use Element of the *General Plan*; and (4) lighting must be designed and shielded or directed so as to not cause glare on adjacent properties or to motorists.

City of San Diego

The City of San Diego designates the portion of the project site within their jurisdiction as Open Space, which is intended to provide for the preservation of land that has distinctive scenic, natural, or cultural features, which contributes to community character and form, or that contains environmentally sensitive resources. The City of San Diego also designates the project site as ESL. ESL Regulations, as defined in City of San Diego Municipal Code Section 143.0101, protect, preserve, and, where damaged, restore the environmentally sensitive lands of the City of San Diego. ESL Regulations apply to areas with sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and special flood hazard areas. Although ESL Regulations sometimes concern visual access and quality (primarily for coastal areas), the portions of the project site that contain the City of San Diego ESL designation involve wetland areas (i.e., biological resources) and flood hazard areas. With the exception of a small portion of the driveway that would be constructed off of West Hills Parkway to provide access to Residential West, only proposed golf course renovations would be located within the City of San Diego.

The City of San Diego's *General Plan – Urban Design Element* (City of San Diego 2006) contains policies that preserve and protect natural landforms and features and that mandate that streets are visually appealing, enhance community identity, provide safe lighting at appropriate intensities, improve walkability, and enhance community gateways. The Park Master Plan (City of San Diego 2013) contains recommendations to work with the Carlton Oaks Golf Course to evolve the golf course edge into a naturalized landscape. Although the proposed San Diego River Trail is not a part of the proposed project, the proposed project would construct a trail that would link to the San Diego River Trail and have the potential to affect the proposed trail due to its proximity to the project site. Additionally, the project applicant would continue to work with the City of Santee, City of San Diego, and SANDAG to ensure that the proposed project's design would not impede the implementation of the trail.

Construction

Construction of Residential West, Residential North, the new hotel with cottages, clubhouse, pro shop, the reconfigured golf course and practice area, and the proposed Project Trail Segment, supplemental trail offer of dedication, and associated safety fencing, would not be visible beyond the vegetation to the north of SR-52, and construction of these features would be hard to distinguish through the bare tree branches, even in winter. However, these elements may be partially visible from SR-52 and more visible from areas surrounding the project, including from West Hills Parkway and the proposed San Diego River Trail abutting the project site to the south. Construction activities associated with the residential components and redevelopment of the hotel, cottages, club house, and pro shop would consist of demolishing the existing buildings (i.e., hotel and clubhouse), removing some existing vegetation, grading, and constructing the new structures. These actions would involve construction equipment, earthwork, debris, and trucks hauling fill material and the debris off site for recycling and disposal. Grading and

paving equipment and activities would be visible during the creation of the roadways, sidewalks, proposed Project Trail Segment and supplemental trail offer of dedication, and pads for the residential units and other buildings; the equipment would come and go in the public view and only be present a short period of time. Bare earth may be visible in some views, due to grading activities. However, as described for construction under Threshold 1, the ground plane and associated earthwork and exposed soils would not affect scenic vista views because they would occur on the ground, and intervening vegetation and development would preclude, or greatly limit, most views of exposed soil. Features such as landscaping, geotextile turf, and hardscape elements to disperse or dissipate water flow would be installed during construction to ensure that the project includes temporary and permanent sediment- and erosion-control measures implemented through PDF-13 (the SWPPP), PDF-14 (SWQMP) that would incorporate the Cities of Santee's and San Diego's JRMP BMPs and site design-performance standards, and measures to prevent erosion along the river (PDF-15, Scour and Erosion Prevention Measures). In addition, it is expected that areas of bare soils would be vegetated upon completion of construction of each relevant phase. For example, the golf course would be landscaped upon completion of Phase 5, and the residential areas would be landscaped upon completion of Phase 7. Therefore, the presence of exposed soils would dwindle as construction progresses toward completion, and features constructed as part of the project (e.g., residences) would block and limit views toward other areas where exposed soil could still be present. In general, although these activities would cause a temporary change in the visual character of the project site, construction activities would not conflict with applicable zoning or other regulations governing scenic quality and would not result in the substantial degradation of the visual quality of the site or surrounding area. As such, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality during construction, impacts would be less than significant, and no mitigation would be required.

Operation

The project would not involve any changes to the land use designations of the project site. The residential development would be consistent with the City of Santee's development standards for the PD zone that were established through development permit DR-2019-5 (see Appendix S, Planned Development District Standards). The proposed project would conform to the height restrictions and other development standards laid out in Appendix S. Section 2.4.3.1 of this EIR describes the architectural styles of the proposed Residential West as Modern Spanish, Transitional Monterey, and Transitional Farmhouse (see Figure 2-8, Residential West Elevations) and the architectural styles of Residential North as Modern Farmhouse, Prairie Inspired, and Spanish-Modern (see Figure 2-10, Residential North Elevations – 50×56 Lots, and Figure 2-11, Residential North Elevations – 47×70 Lots). The styles, massing, and heights (i.e., two stories) of the proposed residential development would be compatible with the surrounding development. These houses would be somewhat more stylized (with the use of more architectural elements, including on the back of homes in Residential West) and newer than the surrounding neighborhoods, and the compact arrangement of the structures within a community would also differ from the development pattern of the surrounding area. Although the proposed residential developments may be more visually distinct compared to the surrounding neighborhoods, they would be compatible and would comprise an extension of the existing residential development that already dominates the area.

As described under Threshold 1, views of the golf course are limited by the trees bordering West Hills Parkway and trees located in between the golf course and existing residential areas to the north. As seen in the simulations for Key Views 1 and 2 in Figures 3.1-2 and 3.1-3, Residential West would introduce 86 two-story homes into this view and completely block all existing views of the golf course and existing residential areas seen from West Hills Parkway. However, landscaping would be installed as part of the proposed project, including landscape screening at the existing homes adjacent to Residential West, if so desired by the homeowners. As seen in these simulations,

the landscaping would visually buffer views of the structures associated with Residential North from this vantage so that the development would not create a visual distraction in the foreground of this scenic vista view. In these views, the proposed Project Trail Segment would not be visible. Furthermore, the proposed development and landscaping would maintain views of the ridgelines in the background and would not obscure these views.

It is not until the viewer is at the edge of the property line, directly adjacent to the proposed residential development, that Residential West appears more dominantly in the view, as illustrated by the simulations Key View 3 in Figure 3.1-4. Although the buildings are more dominant, they do not block views of the hillsides. It is also important to note that the simulations do not include residential landscaping, which would likely be installed by many residents and help to soften the scale of the new structures. For Residential North, views from nearby existing residential areas would lose views of the open golf course, as seen in the simulations for Key View 5 in Figure 3.1-6 and Key View 6 in Figure 3.1-7. However, the proposed development would be well designed and include attractive landscaping that would help to reduce the apparent scale of the development and help to create a visual transition between the existing and new residential development. In addition, as seen in the simulation for Key View 6 in Figure 3.1-7, the proposed development would underground utility lines along Carlton Oaks Drive, reducing visual clutter associated with aboveground utilities and creating an attractive entry into Residential North and the resort.

The proposed project would include redevelopment of the golf course and the hotel and clubhouse building. From a visual character perspective, redevelopment of the golf course would be consistent with the existing use of the site and would not alter its existing visual character. In addition, the proposed clubhouse and hotel would be similar in height and massing as the existing buildings. Although they would be located in a different area of the project site, as already noted, the PD designation does not specify development standards such as height, massing, or setbacks; however, as discussed in Section 3.10, Land Use and Planning, the proposed project would be consistent with the guiding principles identified in the City of Santee's *General Plan – Land Use Element* (Section 8.2) for the golf course. As seen in the simulation for Key View 6 in Figure 3.1-7, the pro shop and learning center would be somewhat visible in this vantage. However, the proposed landscaping screens large portions of these buildings and provides screening for the parking lot. The clubhouse and cottages would not be visible from this vantage because they would be screened from view by existing and proposed landscaping. As seen in the simulations for Key View 7 in Figure 3.1-8, the pro shop and learning center would be visible from Mast Park to the east of the project site but would be partially screened from view by existing and proposed landscaping.

In addition to the on-site project changes, the project would require the installation of up to four new utility poles that would be up to approximately 45–55 feet in height and located in the off-site improvement areas to the north of the project site. The new utility poles would be made of wood, located adjacent to existing poles that are of the same heights, consistent with the existing visual character, and compatible with the surrounding development and existing utilities.

The proposed project would be consistent with City of Santee policies pertaining to scenic resources in its *General Plan – Community Enhancement and Land Use Elements* because the project would respect the natural environment, preserve scenic views from SR-52, and maintain most views to the surrounding hillsides from adjacent residences, and the proposed landscaping would revegetate graded slopes. In addition, the proposed residential uses would be ancillary to the planned resort and recreational facilities and would not detract from or degrade public views of the San Diego River, and the proposed Project Trail Segment and supplemental trail offer of dedication would complement these goals. The 10-foot-tall safety fencing constructed along the Project Trail Segments adjacent to the golf course have the potential to stand out in and detract from views if grey, untreated fencing (e.g., chain link or metal fencing) were used. This is because the grey coloring is more pronounced and acts more as a visual barrier, and such a feature could conflict with policies to respect and preserve scenic views. PDF-

16, Security Fence Coloring, would ensure that the safety fencing will be powder-coated a dark color to ensure that the fencing is more transparent and recedes into views, instead of being more pronounced, like grey, untreated fencing would be. The proposed project would also be consistent with City of San Diego's *General Plan – Urban Design Element* because the project, including the proposed Project Trail Segment, would create streets and recreational facilities that are visually appealing, enhance community identity, improve walkability, and augment the community through the use of sidewalks and streetscaping. Furthermore, although the proposed project would plant grasses near the proposed San Diego River Trail and existing informal footpath, it would not negatively affect views of the trail or preclude future coordination between the City of San Diego and the Carlton Oaks Golf Course to evolve the golf course edge into a naturalized landscape. Based on the above, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality, impacts would be less than significant, and no new mitigation would be required.

Impact Determination

Implementation of the proposed project would not conflict with applicable zoning or other regulations governing scenic quality.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: Would implementation of the proposed project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Impact Discussion

Construction

Construction of the project would increase truck traffic, which would increase glare reflecting off vehicle windshields. However, this increase in glare would be temporary and would not result in such a substantial increase in glare such that daytime views in the area would be affected. Impacts would be less than significant.

Nighttime lighting sources during construction would consist of floodlights that would be focused on the work area to minimize light spillover. As discussed in Section 2.5 of this EIR, construction activities would occur between 7 a.m. and 7 p.m. in compliance with the City of Santee's Noise Ordinance (Santee Municipal Code Section 5.04.090) and the City of San Diego's Noise Ordinance (City of San Diego Municipal Code Section 59.5.0404). This would require construction activities to cease operations by 7 p.m., and lights for construction work (e.g., bright, pole-mounted balloon lights) would not be used beyond this timeframe. Although no nighttime lighting would be used for construction activities, some lighting may be used overnight at the construction site for security reasons. This is anticipated to be one motion-activated light that would be shielded to focus the light downward. However, overnight lighting would not result in a substantial new source of light such that nighttime views would be adversely affected. Impacts would be less than significant.

Operation

Sources of glare resulting from the proposed project would include an increased number of vehicles parking at the project site and the swimming pools and ponds. However, these sources of glare would generally be shielded from surrounding roadways and uses by intervening structures and/or vegetation and would not represent a significant source with the potential to affect daytime views in the area. The proposed buildings would include stucco or wood siding and would not involve the use of glass curtain walls or any other materials that typically cause glare. In addition, landscaping installed through the proposed project and future residences would aid in reducing incidental glare. Therefore, operation of the project would not result in a substantial new source of glare that could disrupt daytime views. Impacts would be less than significant.

New lighting at the project site would include signage, commercial accent lighting, wayfinding, balcony lighting, and security markings. Pedestrian areas such as pathways and entryways into the project site would be well-lit for security. However, light-emitting diode (LED) lighting at Residential West and Residential North would be decorative and have a warm color temperature of 3000 Kelvin. The luminaires would have an up-light rating of zero; thus, no light would extend above the luminaires. The mounting height of the light poles along the roadways within Residential West and Residential North would not exceed 18 feet, and shielding would be employed that would prevent light from spilling onto existing adjacent properties. In addition, the new houses would create a natural barrier to any light spilling onto the adjoining properties. Lastly, interior lighting coming from the interiors of new homes would not be expected to result in nuisance light because existing residential homes are situated closer to the existing streets, they are not located along than the back property line, and existing and proposed residential landscaping would act to filter nighttime lighting. Furthermore, this lighting would be consistent with existing residential lighting adjacent to affected residents. Lighting for the resort would be adequate for nighttime vehicular and pedestrian safety and designed consistently with applicable lighting standards associated with the Cities of Santee's and San Diego's Municipal Codes. Although this lighting would represent new sources of lighting at the project site, all lighting would conform to the requirements of the Santee Municipal Code, Section 13.30.030(B), and the City of San Diego's Municipal Code, Section 142.0740, which stipulate minimization of spillover light through the use of downward directed and shielded lighting. No lighting is proposed for the golf course. Overall, impacts would be less than significant, and no mitigation would be required.

Impact Determination

The proposed project would not introduce new substantial sources of glare or light that would negatively affect daytime or nighttime views in the area. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Less than significant.

3.1.5 Cumulative Impacts and Mitigation Measures

Development of the proposed project would result in the impacts on aesthetics and visual resources identified in Section 3.1.4, Project Impacts and Mitigation Measures, and would contribute to cumulative visual impacts in the

area. The cumulative project area for aesthetics and visual resources includes the City of Santee and the projects identified in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis.

Cumulative Threshold 1: Would implementation of the proposed project have a substantial adverse effect on a scenic vista?

Planned development in the City of Santee would either consist of redevelopment within areas that are already developed or would result in a slight expansion of similar land uses into open space areas or vacant parcels. Roadway users, residents, businesses, and recreationists would see undeveloped areas and vacant parcels within the landscape gradually transition and infill to mixed-use, commercial, and residential development. This development would include the associated transportation and utility infrastructure needed to support it. The cumulative project area affords quality scenic vistas, but many of these vistas are brief and limited by existing development and vegetation. The proposed project retains scenic vista views, and redevelopment and slight expansions of existing land used within the Cities of Santee and San Diego would be subject to policies, zoning ordinances, and design review that would ensure that proposed cumulative projects minimize visual impacts so that they are not cumulatively considerable, and no mitigation would be required.

Cumulative Threshold 2: Would implementation of the proposed project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?

The officially designated State Scenic Highway portion of SR-52 does not fall within cumulative project area; however, the eligible State Scenic Highway portion of SR-52 is located within the cumulative project area. In addition, the City of Santee's *General Plan – Community Enhancement Element* identifies that Mission Gorge Road is a local scenic route (City of Santee 2020). The majority of cumulative projects are not located near these roadways. The cumulative projects located near these roadways would not likely affect views associated with the corridors because they would be located among and blend with existing development in the area. In addition, as identified in the City of Santee's *General Plan – Community Enhancement Element*, development along Mission Gorge Road must comply with the Mission Gorge Road Design Standards. The proposed project would not affect views associated with Mission Gorge Road, and, as described under Threshold 2, the proposed project would not result in a substantial obstruction or interference with the views available from eligible portions of SR-52, nor introduce any visual intrusions that could affect its eligibility to become an officially designated State Scenic Highway. City of Santee policies, zoning ordinances, and design review would ensure that the proposed project minimizes visual impacts so that it is not cumulatively considerable, and no mitigation would be required.

Cumulative Threshold 3: In nonurbanized areas, would implementation of the proposed 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 point.) In urbanized areas, would implementation of the proposed project conflict with applicable zoning and other regulations governing scenic quality?

The majority of the cumulative projects are infill projects and implement the City of Santee's *General Plan* to provide additional housing and commercial, industrial, and community services. Temporary construction activities associated with the proposed project would not result in a cumulatively considerable contribution to visual impacts because of its relatively short-term duration and limited visibility. As described under Cumulative Threshold 1, planned development in the City of Santee would either consist of redevelopment within areas that are already developed or would result in a slight expansion of similar land uses into open space areas or vacant parcels. Roadway users, residents, businesses, and recreationists would see undeveloped areas and vacant parcels within the landscape gradually transition and infill to mixed-use, commercial, and residential development. This

development would include the associated transportation and utility infrastructure needed to support it. The proposed project would contribute incrementally to these cumulative impacts related to planned and proposed development in the area, although it would not substantially alter the existing visual landscape nor degrade the visual quality of the cumulative project area. City of Santee policies, zoning ordinances, and design review would ensure that the proposed project minimizes visual impacts. Therefore, the contribution would not be cumulatively considerable, and no mitigation would be required.

Cumulative Threshold 4: Would implementation of the proposed project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Like the proposed project, most of the cumulative projects are located within or next to areas that are already developed. The cumulative projects would result in an overall increase in light and glare, especially for projects that use blue-rich, white-light lamps (American Medical Association 2016; International Dark-Sky Association 2010a, 2010b, 2015). Studies have found that a 4000-Kelvin white LED light causes approximately 2.5 times more pollution than high-pressure sodium lighting with the same lumen output, which would affect sensitive receptors and more than double the perceived brightness of the night sky (Aubé et al. 2013, Falchi et al. 2011, 2016). This would result in a substantial source of nighttime light and glare that would negatively affect nighttime views in the area if lighting were not properly designed and shielding not employed. Therefore, lighting associated with these developments is likely to somewhat increase the amount of glare and nighttime lighting and would result in a cumulative impact related to ambient light glow and light pollution in the area. However, the proposed project would not result in a considerable contribution to this cumulative impact because of its use of correlated color temperature LED lights with a warm color temperature of 3,000 Kelvins that employ shielding to prevent light spill and reduce ambient light glow. Therefore, the contribution would not be cumulatively considerable, and no mitigation would be required.

3.1.6 Summary of Significant Impacts

There would be no significant impacts associated with aesthetics and visual resources.

3.1.7 References

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3.2 Air Quality and Health Risks

3.2.1 Overview

This section describes the environmental and regulatory setting for air quality. It also describes impacts on air quality that would result from implementation of the proposed Carlton Oaks Country Club and Resort Project (project), and mitigation for significant impacts where feasible and appropriate. This section is based on the State California Environmental Quality Act (CEQA) Guidelines, Appendix G, and the County of San Diego's *Guidelines for Determining Significance for Air Quality* (County of San Diego 2007). The section describes existing air quality in the region, impacts from vehicular emissions that have regional effects, and the exposure of sensitive receptors to project-generated toxic air contaminants (TACs). Information in this section is based on the *Carlton Oaks Country Club and Resort Air Quality Assessment* completed by Ldn Consulting Inc., dated January 31, 2025 (Appendix B1), the *Carlton Oaks Country Club Driving Range Remediation Memorandum*, dated October 21, 2024 (Appendix B2), and the *Intersection Operations Worksheets*, prepared by Intersecting Metrics, dated April 12, 2022 (Appendix B3).

3.2.2 Environmental Setting

This section provides a discussion of existing conditions related to air quality in the study area. The information below is drawn from the relevant oversight agencies, which are the San Diego Air Pollution Control District (SDAPCD), the California Air Resources Board (CARB), and the U.S. Environmental Protection Agency (USEPA).

The project would redevelop the existing Carlton Oaks Country Club Resort into a modern self-sustaining destination resort with an added residential accessory use. The overall site sits on roughly 100.6 acres in the City of Santee and 64.2 acres in the City of San Diego. The project components include redoing the existing golf course and demolishing the existing resort facilities and then reconstructing the redesigned resort using the latest energy-efficient construction techniques. Work proposed on the portion of the project located within the City of San Diego would primarily consist of redoing the portion of the existing golf course located in the City of San Diego. All work on the proposed resort, including demolishing the existing facilities and construction of the residential accessory units, would occur within the City of Santee's jurisdiction.

The project site is within the larger San Diego Air Basin (SDAB); the air basin comprises the study area for the proposed project. Ambient air quality in the study area is affected by climatological conditions, topography, and the types and amounts of pollutants emitted. The following discussion describes relevant characteristics of the SDAB, describes key pollutants of concern, summarizes existing ambient pollutant concentrations, and identifies sensitive receptors.

3.2.2.1 Driving Range Remedial Work

In 2023, as part of the existing golf course's continued operations, soil extracted from another project was transported to the project site to create a berm to aid in golf ball retention. In total, approximately 1,000 cubic yards were moved to the existing driving range during a year-long period. A small bulldozer was used to spread the soil on the site's natural surface contours to create a berm along the outer edge of the driving range, adjacent to Sycamore Canyon Creek. No subsurface disturbance occurred as a result of the soil deposition.

On August 19, 2024, the City of Santee issued a Notice of Violation to the landowner of the project site. The Notice of Violation identified the transportation of the dirt to the driving range without the required permit as a violation of

the City of Santee Municipal Code. The applicant was directed to remove the transported dirt from the driving range and restore the area to preconstruction conditions to the satisfaction of the City of Santee Engineer. The appropriate regulatory agencies were also informed of the potential violation and requested that any restoration be completed prior to the raptor season of 2025.

By the end of 2024, the soil and berm were removed, and the soil was transported off site. The driving range at the project site was returned to its existing topographic contours prior to the soil deposition. The remediation work involved removing the soil and berm from the driving range to restore the site to its original condition. The 1,000 cubic yards of soil was transported off site to a residential construction site located just north of Robertson Street and west of Day Street in the unincorporated town of Ramona, approximately 25 miles away. Equipment used for the removal process involved a 966 loader, a D6 dozer, and a water equipment truck for dust control. The removal process took 2 days.

Although the potential remedial measures are not components of the currently proposed project, the City of Santee has requested that the Environmental Impact Report (EIR) include information regarding these remedial measures for informational purposes, described further in the *Carlton Oaks Country Club Driving Range Remediation Memorandum* (Appendix B2). The water line tunnel boring project that the soil originated from included in its CEQA analysis the transportation of the dirt off site to another location, but instead the soil was moved a short distance to the project site. Therefore, Appendix B2, *Carlton Oaks Country Club Driving Range Remediation Memorandum*, only includes the trips needed to remove the dirt from the project site and move it to the area in Ramona. Conservatively, the daily air emissions from the remediation work was determined not to exceed the screening-level significance thresholds as more particularly described in the *Carlton Oaks Country Club Driving Range Remediation Memorandum* (Appendix B2).

3.2.3 Applicable Laws and Regulations

The federal Clean Air Act (CAA) and its subsequent amendments form the basis for the nation's air pollution control effort. USEPA is responsible for implementing most aspects of the CAA. The National Ambient Air Quality Standards (NAAQS) for criteria pollutants are a key element of the CAA, which delegates enforcement of the NAAQS to the states. In California, CARB is responsible for enforcing air pollution regulations and ensuring that the NAAQS and California Ambient Air Quality Standards (CAAQS) are met. CARB, in turn, delegates regulatory authority for stationary sources and other air quality management responsibilities to local air agencies. SDAPCD is the local air agency for the project site.

The sections that follow provide more detailed information on the federal, state, and local air quality regulations that apply to the proposed project.

3.2.3.1 Federal

Clean Air Act and National Ambient Air Quality Standards

The CAA was first enacted in 1963 but has been amended numerous times in subsequent years (1967, 1970, 1977, and 1990). The CAA establishes the NAAQS and specifies future dates for achieving compliance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for local areas that fail to meet the standards. The plans must include pollution control measures that demonstrate how the standards would be met. Because the proposed project is within the SDAB, it is in an area that has been designated as a nonattainment area for certain pollutants that are regulated under the CAA.

The 1990 amendments to the CAA identify specific emission-reduction goals for areas that fail to meet the NAAQS. The amendments require both a demonstration of reasonable progress toward attainment and incorporation of additional sanctions for failure to attain or meet interim milestones. The sections of the CAA that would most substantially affect development of the proposed project include Title I (Nonattainment Provisions) and Title II (Mobile-Source Provisions).

Title I provisions were established with the goal of attaining the NAAQS for criteria pollutants. Table 3.2-1 shows the NAAQS currently in effect for each criteria pollutant. The CAAQS (discussed below) are provided for reference.

Non-Road Diesel Rule

USEPA has established a series of increasingly strict emissions standards for new off-road diesel equipment, on-road diesel trucks, and locomotives. New construction equipment used for the project, including heavy-duty trucks and off-road construction equipment, would be required to comply with the emissions standards.

EPA Emission Standards for Non-Road Diesel Engines

To reduce emissions from non-road diesel equipment, USEPA established a series of increasingly strict emission standards for new non-road diesel engines. Tier 1 standards were phased in on newly manufactured equipment from 1996 through 2000 (year of manufacture), depending on the engine horsepower category. Tier 2 standards were phased in on newly manufactured equipment from 2001 through 2006. Tier 3 standards were phased in on newly manufactured equipment from 2006 through 2008. Tier 4 standards, which require advanced emission control technology, were phased in from 2008 through 2015.

Corporate Average Fuel Economy Standards

The National Highway Traffic Safety Administration (NHTSA) Corporate Average Fuel Economy (CAFE) standards require substantial improvements in fuel economy and reductions in emissions of criteria air pollutants and precursors, as well as greenhouse gases (GHGs), from all light-duty vehicles sold in the United States. On August 2, 2018, NHTSA and USEPA proposed an amendment to the fuel efficiency standards for passenger cars and light trucks and established new standards for model years 2021 through 2026 that would maintain the then-current 2020 standards through 2026—this was known as the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule. On September 19, 2019, NHTSA and USEPA issued a final action on the One National Program Rule, which is considered a key step in creating a unified standard.

Table 3.2-1. Federal and State Ambient Air Quality Standards

Criteria Pollutant	Average Time	California Standards	National Standards ¹	
			Primary	Secondary
Ozone (O ₃)	1 hour	0.09 ppm	None ²	None ²
	8 hours	0.070 ppm	0.070 ppm	0.070 ppm
Particulate Matter (PM ₁₀)	24 hours	50 µg/m ³	150 µg/m ³	150 µg/m ³
	Annual mean	20 µg/m ³	None	None
Fine Particulate Matter (PM _{2.5})	24 hours	None	35 µg/m ³	35 µg/m ³
	Annual mean	12 µg/m ³	12.0 µg/m ³	15.0 µg/m ³
Carbon Monoxide (CO)	8 hours	9.0 ppm	9 ppm	None
	1 hour	20 ppm	35 ppm	None

Table 3.2-1. Federal and State Ambient Air Quality Standards

Criteria Pollutant	Average Time	California Standards	National Standards ¹	
			Primary	Secondary
Nitrogen Dioxide (NO ₂)	Annual mean	0.030 ppm	0.053 ppm	0.053 ppm
	1 hour	0.18 ppm	0.100 ppm	None
Sulfur Dioxide ³ (SO ₂)	Annual mean	None	0.030 ppm	None
	24 hours	0.04 ppm	0.14 ppm	None
	3 hours	None	None	0.5 ppm
	1 hour	0.25 ppm	0.075 ppm	None
Lead (pB)	30-day average	1.5 µg/m ³	None	None
	Calendar quarter	None	1.5 µg/m ³	1.5 µg/m ³
	3-month average	None	0.15 µg/m ³	0.15 µg/m ³
Sulfates	24 hours	25 µg/m ³	None	None
Visibility-Reducing Particles	8 hours	— ⁴	None	None
Hydrogen Sulfide	1 hour	0.03 ppm	None	None
Vinyl Chloride	24 hours	0.01 ppm	None	None

Source: CARB 2016.

Notes: ppm = parts per million; µg/m³ = micrograms per cubic meter.

- ¹ National standards are divided into primary and secondary standards. Primary standards are intended to protect public health, whereas secondary standards are intended to protect public welfare and the environment.
- ² The national 1-hour standard of 12 parts per hundred million was in effect from 1979 through June 15, 2005. The revoked standard is referenced because it was employed for such a long period and considered a benchmark for SIPs.
- ³ The annual and 24-hour NAAQS for sulfur dioxide apply only for 1 year after designation of the new 1-hour standard in those areas that were previously nonattainment areas for the 24-hour and annual NAAQS.
- ⁴ The CAAQS for visibility-reducing particles is defined by an extinction coefficient of 0.23 per kilometer (visibility of 10 miles or more due to particles when relative humidity is less than 70%).

Part One of the SAFE Vehicles Rule was a precursor to the proposed fuel efficiency standards. The One National Program Rule enables NHTSA and USEPA to provide nationwide uniform fuel economy and air pollutant standards by (1) clarifying that federal law preempts state and local tailpipe standards, (2) affirming NHTSA's statutory authority to set nationally applicable fuel economy standards, and (3) withdrawing California's CAA preemption waiver to set state-specific standards.

NHTSA and USEPA published their decision to withdraw California's waiver and finalize the regulatory text related to the preemption on September 27, 2019 (84 *Federal Register* [FR] 51310). California, 22 other states, the District of Columbia, and two cities filed suit against Part One of the SAFE Vehicles Rule on September 20, 2019 (*California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia). On October 28, 2019, the Union of Concerned Scientists, Environmental Defense Fund, and other groups filed a protective petition for review after the federal government sought to transfer the suit to the District of Columbia (*Union of Concerned Scientists v. National Highway Traffic Safety Administration*). The lawsuit filed by California and others has been stayed, pending resolution of the petition.

NHTSA and USEPA published final rules on April 30, 2020, to amend and establish national air pollutant and fuel economy standards (Part Two of the SAFE Vehicles Rule) (85 FR 24174). The revised rule changes the national fuel economy standards for light-duty vehicles from 46.7 miles per gallon (mpg) to 40.4 mpg in future years. California, 22 other states, and the District of Columbia filed a petition for review of the final rule on May 27, 2020.

On January 20, 2021, President Biden issued an executive order, directing NHTSA and USEPA to review the SAFE Vehicles Rule, Part One, and propose a new rule for suspending, revising, or rescinding it by April 2021. The executive order also requires NHTSA and the USEPA to propose a new rule for suspending, revising, or rescinding Part Two by July 2021. On April 22, 2021, NHTSA announced that it proposes to repeal the SAFE Vehicles Rule, Part One, allowing California the right to set its own standards (NHTSA 2021). On December 21, 2021, NHTSA published its CAFE Preemption Rule, which repeals 2019's SAFE Vehicles Rule, Part One: One National Program. That rule had codified preemption of state and local laws related to fuel economy standards. NHTSA's 2021 rule thus reopens pathways for state and local fuel economy laws.

3.2.3.2 State

California Clean Air Act and California Ambient Air Quality Standards

In 1988, the State Legislature adopted the California Clean Air Act (CCAA), which established a statewide air pollution control program. The CCAA requires all air districts in the state to endeavor to meet the CAAQS by the earliest practical date. Unlike the federal CAA, the CCAA does not set precise attainment deadlines. Instead, the CCAA establishes increasingly stringent requirements for areas that require more time to achieve the standards. The CAAQS are generally more stringent than the NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride. The CAAQS and NAAQS are listed together in Table 3.2-1.

CARB and local air districts bear responsibility for achieving California's air quality standards. The standards are to be achieved through district-level air quality management plans, which are incorporated into the SIP. In California, USEPA has delegated authority to prepare SIPs to CARB, which, in turn, has delegated that authority to individual air districts. CARB has traditionally established state air quality standards, maintained oversight authority for air quality planning, developed programs for reducing emissions from motor vehicles, developed air emissions inventories, collected air quality and meteorological data, and approved SIPs.

The CCAA substantially increases the authority and responsibilities of air districts. The CCAA designates air districts as lead air quality planning agencies, requires air districts to prepare air quality plans, and grants air districts authority to implement transportation control measures. The CCAA also emphasizes control of "indirect and area-wide sources" of air pollutant emissions. The CCAA gives local air pollution control districts explicit authority to regulate indirect sources and establish traffic control measures. SDAPCD is the primary agency responsible for ensuring that the NAAQS and CAAQS are attained and maintained in San Diego County.

Statewide Truck and Bus Regulation

CARB adopted the Truck and Bus Regulation in 2008 to focus its efforts on reducing emissions of diesel particulate matter (DPM), nitrogen oxides (NO_x), and other criteria pollutants from diesel-fueled vehicles. This regulation applies to any diesel-fueled vehicle as well as any dual-fuel or alternative-fuel diesel vehicle that travels on public highways, yard trucks with on-road engines, yard trucks with off-road engines used for agricultural operations, school buses, and vehicles with a gross vehicle weight rating (GVWR) of more than 14,000 pounds. The purpose of the regulation is to require trucks and buses registered in the state to have 2010 or newer engines by 2023. Compliance schedules have been established for lighter vehicles (GVWR of 14,000–26,000 pounds) and heavier vehicles (GVWR of more than 26,001 pounds) (CARB 2020). As of January 1, 2020, only vehicles that met the requirements of the Trucks and Bus Regulation were allowed to register with the California Department of Motor Vehicles.

State Tailpipe Emissions Standards

Like USEPA at the federal level, CARB has established a series of increasingly strict emissions standards for new off-road diesel equipment and on-road diesel trucks operating in California. New equipment used to construct the proposed project would be required to comply with the standards.

Carl Moyer Program

The Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer Program) is a voluntary program that offers grants to owners of heavy-duty vehicles and equipment. The program is a partnership between CARB and the local air districts throughout the state to reduce air pollution emissions from heavy-duty engines. Locally, the air districts administer the Carl Moyer Program.

Toxic Air Contaminant Regulation

California regulates TACs primarily through the Toxic Air Contaminant Identification and Control Act (Tanner Act) and the Air Toxics “Hot Spots” Information and Assessment Act of 1987 (“Hot Spots” Act). In the early 1980s, CARB established a statewide comprehensive air toxics program to reduce exposure to air toxics. The Tanner Act created California’s program to reduce exposure to air toxics. The “Hot Spots” Act supplements the Tanner Act by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

CARB has identified DPM as a TAC and approved a comprehensive Diesel Risk Reduction Plan to reduce emissions from both new and existing diesel-fueled engines and vehicles (CARB 2000). The goal of the plan is to reduce DPM emissions and the associated health risk by 75% by 2010 and by 85% by 2020. The plan identifies 14 measures that CARB would implement over the next several years. Although this program has not been updated, CARB has updated various other programs and regulations to further reduce diesel emissions and associated health risks. For example, the Truck and Bus regulation has been in effect since December 2008. Also, as of January 1, 2023, all diesel-powered vehicles operating in California, with a GVWR over 14,000 pounds must have a 2010 or newer engine. This directly reduces TACs by incorporating new technologies.

3.2.3.3 Local

City of Santee

General Plan

The City of Santee *General Plan’s Mobility Element* and *Land Use Element* include goals and policies to improve air quality conditions within the City of Santee and the SDAB (City of Santee 2017). The following air quality goals and policies would be applicable to the proposed project:

Mobility Element – 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.

Mobility Element – 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.

Mobility Element – Policy 9.2: The City should encourage businesses to provide flexible work schedules for employees.

Mobility Element – Policy 9.3: The City should encourage employers to offer shared commute programs and/or incentives for employees to use transit.

Mobility Element – 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.

Land Use Element - Policy 2.2: The City should encourage the development of higher density residential developments in areas close the multi-modal transit station and along major road corridors where transit and other convenience services are available.

Land Use Element – Policy 4.3: The City should locate new neighborhood commercial uses along major roadways in consolidated centers that utilize common access and parking for commercial uses, discourage the introduction of strip commercial uses, and require adequate pedestrian links to residential areas.

Land Use Element – Policy 5.3: The City should promote the use of innovative site planning to avoid onsite hazards and minimize risk levels.

The City of Santee has adopted a Climate Action Plan, entitled *Sustainable Santee Plan: The City’s Roadmap to Greenhouse Gas Reductions* (SSP), which would provide air quality co-benefits by reducing resource consumption, improving alternative modes of transportation, and reducing overall emissions throughout the City of Santee. The SSP contains the following goals that would provide air quality co-benefits (City of Santee 2019):

Goal 1: Increase Energy Efficiency in Existing Residential Units

Goal 2: Increase Energy Efficiency in New Residential Units

Goal 3: Increase Energy Efficiency in Existing Commercial Units

Goal 4: Increase Energy Efficiency in New Commercial Units

Goal 5: Decrease Energy Demand through Reducing Urban Heat Island Effect

Goal 6: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled

Goal 7: Increase Use of Electric Vehicles

Goal 8: Improve Traffic Flow

Goal 9: Decrease Greenhouse Gas Emissions through Reducing Solid Waste Generation

Goal 10: Decrease Greenhouse Gas Emissions through Increasing Clean Energy Use

City of San Diego

Air Pollution Control District

SDAPCD has local air quality jurisdiction over projects in San Diego County. Responsibilities of the air district include overseeing stationary-source emissions, approving permits, maintaining emissions inventories, maintaining air quality stations, overseeing agricultural burning permits, and providing CEQA compliance assistance on an as-needed basis. SDAPCD is also responsible for establishing and enforcing local air quality rules and regulations that address the requirements of federal and state air quality laws and ensuring that the NAAQS and CAAQS are met.

SDAPCD has adopted air quality plans to improve air quality, protect public health, and protect the climate. The San Diego Regional Air Quality Strategy (RAQS) outlines SDAPCD's plans and control measures to attain and maintain state standards. San Diego's portions of the SIP are designed to attain and maintain federal standards. The RAQS was adopted in 1991 and updated in 1995, 1998, 2001, 2004, 2009, and most recently in December 2016. The RAQS does not currently address state air quality standards for particulate matter with an aerodynamic diameter of 10 micrometers or less (PM₁₀) or particulate matter with an aerodynamic diameter of 2.5 micrometers or less (PM_{2.5}). As required under the federal CAA for areas that are out of attainment for air quality standards, SDAPCD developed input to the SIP for the air basin. Both the RAQS and SIP demonstrate the effectiveness of CARB measures (mainly for mobile sources) as well as SDAPCD's plans and control measures (mainly for stationary and area-wide sources) for attaining the NAAQS for ozone.

SDAPCD adopted its attainment plan and reasonable available control technology demonstration for the 2008 8-hour NAAQS for ozone. In addition, the Measures to Reduce Particulate Matter in San Diego County report proposes measures to reduce particulate matter (PM) emissions. It also recommends measures for further detailed evaluation and, if appropriate, future rule development (or non-regulatory development, if applicable), adoption, and implementation in San Diego County in order to attain the CAAQS for PM (SDAPCD 2005).

The project may be subject to the SDAPCD rules listed below. This list may not be all encompassing because additional SDAPCD rules may apply to the project as specific components are identified.

Regulation 2, Rule 20.2 – New Source Review Non-Major Stationary Sources: Establishes air quality impact analysis (AQIA) trigger levels, which set emission limits for non-major new or modified stationary sources.

Rule 50 – Visible Emissions: Establishes limits to the opacity of emissions within the SDAPCD. The proposed facility is subject to Rule 50(d)(1) and (6) and should not exceed the visible-emission limitation.

Rule 51 – Nuisance: Prohibits emissions that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public; endanger the comfort, repose, health, or safety of any such persons or the public; or cause injury or damage to business or property.

Rule 52 – Particulate Matter: Establishes limits to the discharge of any particulate matter from non-stationary sources.

Rule 54 – Dust and Fumes: Establishes limits to the amount of dust or fumes discharged into the atmosphere in any 1 hour.

Rule 55 – Fugitive Dust Control: Sets restrictions on visible fugitive dust from construction and demolition projects.

Rule 67 – Architectural Coatings: Establishes limits to the volatile organic compound (VOC) content for coatings applied within the SDAPCD.

Rule 67.7 – Cutback and Emulsified Asphalts: Establishes limits to the VOC content for cutback and emulsified asphalts used in roadways.

Rule 1206 – Asbestos Removal, Renovation, and Demolition: Establishes guidelines and procedures for handling asbestos-containing materials.

SDAPCD has not developed advisory emission thresholds or guidance to assist lead agencies in determining the level of significance of a project's emissions in CEQA documents. However, the County of San Diego has developed guidance that includes recommended screening-level thresholds.

Furthermore, County Code Section 87.428 (Dust Control Measures) requires all clearing and grading to be carried out with dust control measures that are adequate and able to prevent the creation of a nuisance for persons or for public or private property. To achieve this, clearing, grading, or improvement plans must require measures such as the following: watering, applications of surfactants, shrouding, limits on vehicle speeds, paving in access areas, or other operational or technological measures to reduce the dispersion of dust. These project design measures are to be incorporated into all earth-disturbing activities to minimize the amount of PM emissions from construction.

General Plan

The City of San Diego General Plan Conservation Element includes goals and policies to improve the air quality conditions within the City and the SDAB (City of San Diego 2008). Only the golf course portion of the proposed project is within the City of San Diego boundaries. The following policies are applicable to the proposed project:

Policy CE-F.4: Preserve and plant trees and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.

Policy CE-F.5: Promote technological innovations to help reduce automobile, truck, and other motorized equipment emissions.

Municipal Code

The San Diego Municipal Code addresses air quality and odor impacts in Section 142.0710, Air Contaminant Regulations, which states that air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and PM, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises on which the use emitting the contaminants is located (City of San Diego 2022).

3.2.3.4 Climate and Atmospheric Conditions

Regional

The weather of San Diego County is profoundly influenced by the Pacific Ocean and its semipermanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average minimum temperature for January ranges from the mid-40s to the high 50s (4 °C to 15 °C) across San Diego County. July maximum temperatures average in the mid-80s to the high 90s (high 20s to the high 30s °C). Most of the San Diego County's precipitation falls from November through April, with infrequent (approximately 10%) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches (254 millimeters); the amount increases with elevation as moist air is lifted over the mountains.

The weather of San Diego County, including the SDAB, is dominated by a semipermanent high-pressure cell located over the Pacific Ocean. The interaction of ocean, land, and the Pacific High-Pressure Zone maintains clear skies for much of the year and drives the prevailing winds. Local terrain is often the dominant factor inland. Winds in mountainous inland areas tend to blow upward in the valleys during the day and downward at night.

In conjunction with the onshore/offshore wind patterns, two types of temperature inversions (i.e., reversal of the normal decrease in temperature with height) occur within the region that affect atmospheric dispersive capability and act to degrade local air quality. In the summer, an inversion at about 1,100 feet to 2,500 feet (335 meters to 765 meters) forms over the entire coastal plain when the warm air mass over the land is undercut by a shallow layer of cool marine air flowing onshore. The prevailing sunny days in the region further exacerbate the smog problem by inducing additional adverse photochemical reactions. During the winter, a nightly shallow inversion layer (usually at about 800 feet, or 243 meters) forms between the cooled air at the ground and the warmer air above, which can trap vehicular pollutants. The days with the highest carbon monoxide (CO) concentrations occur during the winter months.

The predominant onshore/offshore wind pattern is sometimes interrupted by so-called Santa Ana conditions, when high pressure over the Nevada-Utah region overcomes the prevailing westerly wind direction. This draws strong, steady, hot, and dry winds from the east over the mountains and out to sea. Strong Santa Ana winds tend to blow pollutants out over the ocean, producing clear days. However, at the onset or breakdown of these conditions, or if the Santa Ana is weak, prevailing northwesterly winds are re-established that send polluted air from the Los Angeles basin ashore in the SDAB. Smog transport from the South Coast Air Basin (SCAB; the metropolitan areas of Los Angeles, Orange, San Bernardino, and Riverside Counties) is a key factor on more than half the days when San Diego exceeds clean air standards.

3.2.3.5 Pollutants of Concern

Criteria Pollutants

As discussed above in the Regulatory Setting section, the federal government and the state have established the NAAQS and the CAAQS, respectively, for six criteria pollutants: ozone, CO, lead, nitrogen dioxide (NO₂), sulfur dioxide (SO₂), PM₁₀, and PM_{2.5}. Ozone is considered a regional pollutant because its precursors—reactive organic gases (ROGs) and NO_x—combine to affect air quality on a regional scale. Pollutants such as NO₂, CO, SO₂, and lead are considered local pollutants that tend to accumulate in the air locally. PM is both a regional and local pollutant.

All criteria pollutants can have human health and environmental effects at certain concentrations. The ambient air quality standards for these pollutants (Table 3.2-1) are set to protect public health and the environment with an adequate margin of safety (CAA Section 109). Epidemiological, controlled human exposure, and toxicology studies evaluate potential health and environmental effects of criteria pollutants and form the scientific basis for new and revised ambient air quality standards.

The primary criteria pollutants of concern that could be generated by the project are ozone precursors (ROGs and NO_x) as well as lead, SO_x, CO, and PM.^{1,2} The principal characteristics and possible health and environmental effects from project-generated exposure to primary criteria pollutants are summarized in Table 3.2-2 and described in more detail below. It should be noted that lead is typically analyzed in air quality studies near industrial sources or in areas where soils may be contaminated with leaded fuels.

Ozone

Ozone, or smog, is a photochemical oxidant that is formed when ROG and NO_x (both by-products of the internal-combustion engine) react with sunlight. Ozone poses a health threat to those who already suffer from respiratory diseases (e.g., asthma), children, older adults, and people who are active outdoors. Exposure to ozone at certain concentrations can make breathing more difficult, cause shortness of breath and coughing, inflame and damage the airways, aggregate lung diseases, increase the frequency of asthma attacks, and cause chronic obstructive pulmonary disease. Studies show associations between short-term ozone exposure and non-accidental mortality, including deaths from respiratory issues. Studies also suggest long-term exposure to ozone may increase the risk of respiratory-related deaths (USEPA 2023a). The concentration of ozone at which health effects are observed depends on an individual's sensitivity, level of exertion (i.e., breathing rate), and duration of exposure. Studies show large individual differences in the intensity of symptomatic responses, with one study finding no symptoms to the least responsive individual after a 2-hour exposure to 400 parts per billion of ozone and a 50% decrement in forced airway volume in the most responsive individual. Although the results vary, evidence suggest that sensitive populations (e.g., asthmatics) may be affected on days when the 8-hour maximum ozone concentration reaches 80 parts per billion (USEPA 2023b). In 2016, the average background 1-hour and 8-hour ozone levels were 95 and 79 parts per billion, respectively (SDAPCD 2016). In addition, ozone has been tied to crop damage, typically in the form of stunted growth and premature death. Ozone can also act as a corrosive, resulting in property damage such as the degradation of rubber products.

Organic Gases

Organic gases include ROGs and VOCs. Hydrocarbon (HC) gases are organic gases formed solely of hydrogen and carbon. ROGs include all HC gases, except those exempted by CARB. Therefore, ROGs are a set of organic gases, according to state rules and regulations. VOCs are similar to ROGs in that they include all organic gases, except those exempted by federal law. Both VOCs and ROGs are emitted from incomplete combustion of carbon-based fuels. Combustion engine exhaust, oil refineries, and oil-fueled power plants are the primary sources of HC. Another source of HC is evaporation from petroleum fuels, solvents, dry-cleaning solutions, and paint. Generally speaking,

¹ There are also ambient air quality standards for lead, sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particulates. However, these pollutants are typically associated with industrial sources, which are not included as part of the project. Accordingly, they are not evaluated further.

² Most emissions of NO_x are in the form of nitric oxide (NO) (Reşitoğlu 2018). Conversion to NO₂ occurs in the atmosphere as pollutants disperse downwind. Accordingly, NO₂ is not considered a local pollutant of concern for the proposed project and is not evaluated further.

and in this analysis, ROGs and VOCs are used interchangeably to refer to the HC gases that are a precursor to ozone formation.

Table 3.2-2. Sources and Health Effects of Air Pollutants

Pollutant	Sources	Primary Effects
Ozone (O ₃)	<ul style="list-style-type: none"> ▪ Precursor sources, such as motor vehicles, industrial emissions, and consumer products¹ 	<ul style="list-style-type: none"> ▪ Respiratory symptoms ▪ Worsening of lung disease, leading to premature death ▪ Damage to lung tissue ▪ Crop, forest, and ecosystem damage ▪ Damage to a variety of materials, including rubber, plastics, fabrics, paints, and metals
Particulate Matter Less than 2.5 Microns in Aerodynamic Diameter (PM _{2.5})	<ul style="list-style-type: none"> ▪ Cars and trucks (especially diesel vehicles) ▪ Fireplaces and wood stoves ▪ Windblown dust from roadways, agriculture, and construction 	<ul style="list-style-type: none"> ▪ Premature death ▪ Hospitalization for worsening of cardiovascular disease ▪ Hospitalization for respiratory disease ▪ Asthma-related emergency room visits ▪ Increased symptoms and increased inhaler usage
Particulate Matter Less than 10 Microns in Aerodynamic Diameter (PM ₁₀)	<ul style="list-style-type: none"> ▪ Cars and trucks (especially diesel vehicles) ▪ Fireplaces and wood stoves ▪ Windblown dust from roadways, agriculture, and construction 	<ul style="list-style-type: none"> ▪ Premature death and hospitalization, primarily from worsening of respiratory disease ▪ Reduced visibility and material soiling
Nitrogen Oxides (NO _x)	<ul style="list-style-type: none"> ▪ Any source that burns fuel, such as cars, trucks, construction and farming equipment, and residential heaters and stoves 	<ul style="list-style-type: none"> ▪ Lung irritation ▪ Enhanced allergic responses
Carbon Monoxide (CO)	<ul style="list-style-type: none"> ▪ Any source that burns fuel, such as cars, trucks, construction and farming equipment, and residential heaters and stoves 	<ul style="list-style-type: none"> ▪ Chest pain in patients with heart disease ▪ Headaches ▪ Light-headedness ▪ Reduced mental alertness
Sulfur Oxides (SO _x)	<ul style="list-style-type: none"> ▪ Combustion of sulfur-containing fossil fuels ▪ Smelting of sulfur-bearing metal ores ▪ Industrial processes 	<ul style="list-style-type: none"> ▪ Worsening of asthma (e.g., increased symptoms, increased medication usage, emergency room visits)
Lead (Pb)	<ul style="list-style-type: none"> ▪ Contaminated soil ▪ Lead-based paints 	<ul style="list-style-type: none"> ▪ Impaired mental functioning in children ▪ Learning disabilities in children ▪ Brain and kidney damage
Toxic Air Contaminants (TACs)	<ul style="list-style-type: none"> ▪ Cars and trucks (especially diesel vehicles) ▪ Industrial sources, such as chrome platers ▪ Neighborhood businesses, such as dry cleaners and service stations 	<ul style="list-style-type: none"> ▪ Cancer ▪ Reproductive and developmental effects ▪ Neurological effects

Table 3.2-2. Sources and Health Effects of Air Pollutants

Pollutant	Sources	Primary Effects
	▪ Building materials and products	

Source: CARB 2023a.

¹ Ozone is not generated directly by these sources. Rather, precursor pollutants from these sources (i.e., ROGs and NO_x) react with sunlight to form ozone in the atmosphere.

The primary health effects of HC result from the formation of ozone and its related effects. High levels of HC in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. There are no separate ambient air quality standards for ROGs. Carcinogenic forms of ROG are considered to be TACs, which are described below. An example is benzene, which is a carcinogen.

Particulate Matter

PM consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized—inhalable coarse particles, or PM₁₀, and inhalable fine particles, or PM_{2.5}. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind on arid landscapes also contributes substantially to local particulate loading.

Particulate pollution can be transported over long distances and may adversely affect humans, especially for people who are naturally sensitive or susceptible to breathing problems. Numerous studies have linked PM exposure to premature death in people with pre-existing heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms. Depending on its composition, both PM₁₀ and PM_{2.5} can also affect water quality and acidity, deplete soil nutrients, damage sensitive forests and crops, affect ecosystem diversity, and contribute to acid rain (USEPA 2022).

Nitrogen Oxides

NO_x serve as integral participants in the process of photochemical smog production. The two major forms of NO_x are nitric oxide (NO) and NO₂. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO₂ is an irritating reddish-brown gas formed by the combination of NO and oxygen. NO_x acts as an acute respiratory irritant and increases susceptibility to respiratory pathogens. NO_x is a precursor to ozone formation.

Carbon Monoxide

CO is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. In the study area, high CO levels are of greatest concern during the winter when periods of light wind combine with the formation of ground-level temperature inversions from evening through early morning. These conditions trap pollutants near the ground, reducing the dispersion of vehicle emissions. Moreover, motor vehicles exhibit increased CO emission rates at low air temperatures. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation. Exposure to CO at high concentrations can also cause fatigue, headaches, confusion, dizziness, and chest pain. There are no ecological or environmental effects related to ambient CO (CARB 2023b).

Sulfur Dioxide

SO₂ is generated by the burning of fossil fuels, industrial processes, and natural sources, such as volcanoes. In recent years, emissions of SO₂ have been significantly reduced by the increasingly stringent controls placed on the sulfur content of fuels used in stationary sources and mobile sources. SO₂ is a precursor to fine PM formation in the form of sulfates, such as ammonium sulfate. Short-term exposure to SO₂ can aggravate the respiratory system, making breathing difficult. Controlled laboratory studies indicate that a brief exposure (5 to 10 minutes) to an average SO₂ level of 0.4 part per million can result in increases in air resistance for exercising asthmatics. Healthy adults do not show any symptoms to SO₂ at levels as high as 1 part per million, even after up to 3 hours of exposure. SO₂ can also affect the environment by damaging foliage and decreasing plant growth (USEPA 2023c).

Lead

Lead, a metal, is found naturally in the environment as well as manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the phase-out of leaded gasoline, metal processing is currently the primary source of lead emissions. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery factories. Twenty years ago, mobile sources were the main contributor to ambient lead concentrations in the air. In the early 1970s, USEPA established national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. USEPA banned the use of leaded gasoline in highway vehicles in December 1995. As a result of USEPA regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector and levels of lead in the air have decreased dramatically. Emissions from lead typically result from industrial processes such as ore and metals processing, and leaded aviation gasoline. These sources are not proposed as part of the proposed project; therefore, lead emissions are not included in the project analysis.

Toxic Air Contaminants

Although ambient air quality standards have been established for criteria pollutants, no ambient standards exist for TACs. Many pollutants are identified as TACs because of their potential to increase the risk of developing cancer or their acute or chronic health risks. For TACs that are known or suspected carcinogens, CARB has consistently found that there are no levels or thresholds below which exposure is risk free. Individual TACs vary greatly with respect to the risks they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs are identified and their toxicity studied by the California Office of Environmental Health Hazard Assessment (OEHHA).

Air toxics are generated by many sources, including stationary sources, such as dry cleaners, gas stations, auto body shops, and combustion sources; mobile sources, such as motor vehicles, diesel trucks, ships, and trains; and area sources, such as farms, landfills, and construction sites. The adverse health effects of TACs can be carcinogenic (cancer causing), short-term (acute) noncarcinogenic, and long-term (chronic) noncarcinogenic. Direct exposure to these pollutants has been shown to cause cancer, birth defects, damage to the brain and nervous system, and respiratory disorders. The primary TACs of concern associated with the proposed project are DPM and asbestos.

DPM is a carcinogen and would be generated by diesel-powered off-road equipment and heavy-duty trucks during construction activities. Chronic (long-term) and acute (short-term) exposure to DPM can cause illnesses such as acute irritation (e.g., eye, throat, bronchial), neurophysiological symptoms (e.g., lightheadedness, nausea), reproductive effects, kidney and blood effects, central nervous system effects, birth defects, respiratory symptoms

(e.g., cough, phlegm) and other adverse environmental effects. EPA has determined that diesel exhaust is “likely to be carcinogenic to humans by inhalation” (USEPA 2003).

Asbestos is the name given to many naturally occurring fibrous silicate minerals. It has been mined for applications that require thermal insulation, chemical and thermal stability, and high tensile strength. It is also found in its natural state in rock or soil (known as naturally occurring asbestos, or NOA). Mapping published by the U.S. Geological Survey (USGS) and California Geological Survey indicates that the project site does not have any reported historic asbestos mines, historic asbestos prospects, asbestos-bearing talc deposits, fibrous amphiboles, or ultramafic rock outcrops (USGS and CGS 2011). If it is determined that existing on-site buildings contain asbestos-containing materials, the project would follow the guidance of SDAPCD Rule 1206 during demolition activities.

Odors

Offensive odors can be unpleasant and lead to citizen complaints to local governments and air districts. According to CARB’s *Air Quality and Land Use Handbook*, land uses associated with odor complaints typically include wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, chemical plants, petroleum refineries, auto body shops, coating operations, fiberglass manufacturing plants, foundries, rendering plants, and livestock operations. CARB provides recommended screening distances for siting new receptors near existing odor sources (CARB 2005).

Sensitive Receptors

The impact of emissions on sensitive members of the population is a special concern. Sensitive land uses are defined as locations where pollutant-sensitive members of the population may reside or where the presence of air pollutant emissions could adversely affect use of the land. Sensitive members of the population include those who may experience greater harm from poor air quality than other members of the population. CARB has identified the following people as the most likely to be affected by air pollution: children younger than 14, adults older than 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors (CARB 2005). Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, day-care facilities, elder-care facilities, schools, and parks.

The proposed project would include recreational and residential land uses within an urban environment that includes various residential, park, school, and commercial facilities, along with open space. The proposed project would include the development of residences and redevelopment of the Carlton Oaks Golf Course, which would occur near sensitive land uses, including single-family homes and Carlton Oaks School. The closest sensitive receptors would be the single-family homes located along the northern portion of the project’s northern boundary, located approximately 15 feet away.

3.2.3.6 Existing Air Quality Conditions

SDAPCD maintains and operates a network of ambient air monitoring stations throughout the San Diego County. The purpose of the monitoring stations is to measure the ambient concentrations of pollutants and determine whether the ambient air quality meets the CAAQS and NAAQS. The ambient monitoring station closest to the proposed project is the El Cajon–Lexington Elementary School station (CARB 2023c), approximately 5 miles to the southeast.

Concentrations of pollutants from the El Cajon-Lexington Elementary School Monitoring Station for 2019 to 2021 are presented in Table 3.2-3. Over the most recent 3 years with available data, monitoring has shown the following pollutant concentration trends: the 8-hour NAAQS for ozone were exceeded from 2019 to 2021, and the NAAQS for PM_{2.5} were exceeded twice in 2020. No violations of the CAAQS or NAAQS for CO, NO₂, or PM₁₀ were recorded or violations of the 1-hour standard for ozone.

Table 3.2-3. Ambient Background Concentrations from the El Cajon-Lexington Elementary School Monitoring Station

Pollutant Standards	2019	2020	2021
1-Hour Ozone (O₃)			
Maximum Concentration (ppm)	0.094	0.094	0.088
Number of Days Standard Exceeded			
CAAQS 1-hour Standard (> 0.09 ppm)	0	0	0
8-Hour Ozone (O₃)			
State Maximum Concentration (ppm)	0.075	0.083	0.077
National Maximum Concentration (ppm)	0.074	0.083	0.076
National Fourth-Highest Concentration (ppm)	0.068	0.079	0.067
Number of Days Standard Exceeded			
CAAQS 8-hour Standard (> 0.070 ppm)	2	14	3
NAAQS 8-hour Standard (> 0.070 ppm)	2	14	3
Carbon Monoxide (CO)			
Maximum Concentration 8-hour Period (ppm)	1.0	1.4	1.1
Maximum Concentration 1-hour Period (ppm)	1.3	1.5	1.2
Number of Days Standard Exceeded			
NAAQS 8-hour Standard (≥ 9 ppm)	0	0	0
CAAQS 8-hour Standard (≥ 9.0 ppm)	0	0	0
NAAQS 1-hour Standard (≥ 35 ppm)	0	0	0
CAAQS 1-hour Standard (≥ 20 ppm)	0	0	0
Nitrogen Dioxide (NO₂)			
Maximum 1-hour Concentration (ppm)	0.039	0.044	0.038
Annual Average Concentration (ppm)	0.008	0.008	0.006
Number of Days Standard Exceeded			
CAAQS 1-hour Standard (0.18 ppm)	0	0	0
NAAQS 1-hour Standard (0.100 ppm)	0	0	0
Suspended Particulates (PM₁₀)			
State Maximum 24-hour Concentration	37.4	ND	ND
National Maximum 24-hour Concentration	38.7	ND	ND
State Annual Average Concentration (CAAQS = 20 µg/m ³)	ND	ND	ND
Number of Days Standard Exceeded			
CAAQS 24-hour Standard (> 50 µg/m ³)	0	ND	ND
NAAQS 24-hour Standard (> 150 µg/m ³)	0	ND	ND

Table 3.2-3. Ambient Background Concentrations from the El Cajon-Lexington Elementary School Monitoring Station

Pollutant Standards	2019	2020	2021
Suspended Particulates (PM_{2.5})			
National Maximum 24-hour Concentration (µg/m ³)	23.8	38.2	30.2
24-hour Standard 98 th Percentile (µg/m ³)	16.0	29.9	22.7
National Annual Average Concentration (NAAQS = 12.0 µg/m ³)	8.5	10.3	9.7
State Annual Average Concentration (CAAQS = 12 µg/m ³)	ND	11.6	10.4
Number of Days Standard Exceeded			
NAAQS 24-hour Standard (>35 µg/m ³)	0	2	0

Source: CARB 2023c; USEPA 2023d. Data compiled by ICF.

Notes: ppm = parts per million; ND = insufficient data for determining the value; µg/m³ = micrograms per cubic meter.

Local air quality monitoring data are used by USEPA and CARB to assess and classify the air quality status (i.e., nonattainment, maintenance, attainment, unclassified) of each regional air basin, county, or, in some cases, a specific urbanized area. If a pollutant concentration is lower than the state or federal standard, the area is classified as being in attainment for that pollutant. If a pollutant violates the standard, the area is considered a nonattainment area. If data are insufficient for determining whether a pollutant is violating the standard, the area is designated as unclassified. The CAA requires USEPA to designate areas within the country as either attainment or nonattainment areas for each criteria pollutant, based on whether the NAAQS have been achieved. Under the CAA, areas are designated as nonattainment areas if the monitored air quality data shows an exceedance of the criteria for a particular pollutant. Similarly, the CCAA requires CARB to designate areas in California as either attainment or nonattainment area for each criteria pollutant, based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment areas if monitored air quality data shows that a state standard for the pollutant was violated at least once during the previous 3 calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment areas. The attainment status of San Diego County is summarized in Table 3.2-4.

Table 3.2-4. Federal and State Attainment Status for San Diego County

Criteria Pollutant	Federal Designation	State Designation
O ₃	Nonattainment	Nonattainment
CO	Attainment	Attainment
PM ₁₀	Unclassifiable/Attainment	Nonattainment
PM _{2.5}	Attainment	Nonattainment
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

Source: SDAPCD 2023.

Notes: O₃ = ozone; CO = carbon monoxide; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; NO₂ = nitrogen dioxide; SO₂ = sulfur dioxide.

At the time of designation, if the available data do not support a designation of attainment or nonattainment, the area is designated as unclassified.

3.2.4 Project Impact Analysis

This section describes the impact analysis related to air quality for the project. It describes the methods used to determine the impacts of the project and lists the thresholds used to conclude whether an impact would be significant. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany each impact discussion.

3.2.4.1 Thresholds of Significance

The significance criteria listed below are based on Appendix G of the State CEQA Guidelines. They provide the basis for determining the significance of air quality impacts resulting from implementation of the proposed project. The proposed project would have a significant effect if it would result in any of the conditions listed below:

1. Conflict with or obstruct implementation of the applicable air quality plan.
2. Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard.
3. Expose sensitive receptors to substantial pollutant concentrations.
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The vast majority of work within the project site is within the City of Santee. The City of Santee has not adopted air quality emissions thresholds for CEQA purposes. Instead, the City of Santee relies on SDAPCD's CEQA Guidance, which recommends the use of the County of San Diego's air quality guidelines for the assessment of air quality impacts (County of San Diego 2007). A small component of the project site is within the City of San Diego, but is limited to earthwork activities only. The City of San Diego has adopted CEQA Guidelines, which use SDAPCD thresholds, with the exception of VOCs, where the City of San Diego has a threshold of 137 pounds per day, and the County of San Diego's VOC threshold is 75 pounds per day. If emissions for VOC are limited to 75 pounds per day for the project, then consistency with either threshold is met. Therefore, the approach of this analysis is to use the County of San Diego's thresholds for CEQA as it relates to air quality, as they are more conservative.

The County of San Diego (2007) criteria listed below were used to determine whether the project would expose sensitive receptors to substantial pollutant concentrations:

1. Would the project place sensitive receptors near CO hot spots or create CO hot spots near sensitive receptors?
2. Would the project result in exposure to TACs, resulting in a maximum incremental cancer risk greater than 1 in 1 million without application of Toxics Best Available Control Technology (T-BACT) or a health hazard index greater than 1 and thus be deemed as having a potentially significant impact?
3. Would the project either generate objectionable odors or place sensitive receptors next to existing objectionable odors, which would affect a considerable number of persons or the public?

The County of San Diego criteria listed below were used to determine whether the project would result in cumulative air quality impacts:

1. A project that has a significant direct impact on air quality with regard to emissions of PM₁₀, PM_{2.5}, NO_x, and/or VOCs would also have a significant cumulatively considerable net increase.
2. In the event direct impacts from a proposed project are less than significant, a project may still have a cumulatively considerable impact on air quality if the emissions of concern from the proposed project, in combination with the emissions of concern from other past, present, or reasonably foreseeable future projects within the proximity relevant to the pollutants of concern, are in excess of direct air quality impact thresholds.

The State CEQA Guidelines, Appendix G (14 CCR 15000 et seq.), provide guidance for determining whether a project could result in significant air quality impacts. Appendix G authorizes lead agencies to use the significance criteria established by the applicable air quality management district or air pollution control district when making a determination. Section 15064.7(c) states that, when 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.

The section that follows summarizes local air district thresholds and presents substantial evidence regarding the basis on which the thresholds were developed. It also describes how the thresholds were used to determine whether emissions from project construction and operation would result in the conditions listed below:

- Interfere with or impede attainment of State or federal ambient air quality standards (CAAQS and NAAQS, respectively).
- Increase risks to human health.

Regional Thresholds for SDAB Attainment of State and Federal Ambient Air Quality Standards

As previously indicated, the State CEQA Guidelines provide that the significance criteria established by the applicable air quality management or air pollution control district may be relied on to determine whether a project would violate or impede attainment of air quality standards. The attainment status of each pollutant is assigned to the entire air basin. In San Diego, the SDAB is defined as “all of San Diego County” (17 CCR 60110). Therefore, the current attainment status for the entire San Diego region, which includes the nonattainment status for ozone under the NAAQS and ozone, PM₁₀, and PM_{2.5} under the CAAQS, applies to the entire San Diego County.

Although SDAPCD has not developed specific thresholds of significance to evaluate construction and operational impacts within CEQA documents, SDAPCD’s Regulation II, Rules 20.2 and 20.3 (new source review for non-major and major stationary sources, respectively), outline AQIA trigger levels for criteria pollutants associated with new or modified sources. Based on SDAPCD’s AQIA trigger levels, as well as USEPA rulemaking and CEQA thresholds adopted by the South Coast Air Quality Management District (SCAQMD), San Diego County has established screening-level thresholds (SLTs) to assist lead agencies in determining the significance of project-level air quality impacts within San Diego County (as shown in Table 3.2-5). Although SDAPCD does not have VOC or PM_{2.5} AQIA trigger levels, the County of San Diego has adopted a PM_{2.5} SLT, based on EPA’s Proposed Rule to Implement the Fine Particle NAAQS, published on September 8, 2005. This is also consistent with SCAQMD’s air quality significance thresholds (SCAQMD 2023) and a VOC SLT, based on the threshold of significance for VOCs from the SCAQMD for the Coachella Valley. Emissions in excess of the County of San Diego’s SLTs, shown in Table 3.2-5, would be expected to have a significant impact on air quality because an exceedance of the SLTs is anticipated to contribute to CAAQS and NAAQS violations in San Diego County.

The County of San Diego's SLTs are based on SDAPCD AQIA trigger levels; the AQIA trigger levels are based on emissions levels identified under the New Source Review (NSR) program, which is a permitting program established by Congress as part of the CAA Amendments of 1990 to ensure that air quality is not significantly degraded by new or modified sources of emissions. The NSR program requires stationary sources to receive permits before construction begins and/or equipment is used. By permitting large stationary sources, the NSR program ensures that new emissions would not slow regional progress toward attaining the NAAQS. SDAPCD, which implements the NSR program through Rules 20.2 and 20.3, has concluded that the stationary pollutants described under the NSR program are as significant as those pollutants generated with land use projects. SDAPCD's trigger levels were set as the total emission thresholds associated with the NSR program to help attain and maintain the NAAQS from new and modified non-major stationary sources (SDAPCD 2019, 2021). SDAPCD's trigger levels take into account the region's attainment status, emission profile, inventory, and projections. They represent levels above which project-generated emissions could affect SDAPCD's and the San Diego Association of Governments' (SANDAG's) commitment to attaining state and federal standards in the region. Consistent with Section 15064.7(c) of the State CEQA Guidelines,³ the evidence in support of the air quality thresholds shown in Table 3.2-5 is deemed appropriate for their use in this analysis and in this location within the greater SDAB.

Health-Based Thresholds for Project-Generated Pollutants of Human Health Concern

Criteria pollutants that would be generated by the proposed project are associated with some form of health risk (e.g., asthma). Criteria pollutants can be classified as either regional or localized pollutants. Regional pollutants can be transported over long distances and affect ambient air quality far from the emissions source. Localized pollutants affect ambient air quality near the emissions source. Ozone is considered regional criteria pollutant, whereas NO₂, CO, SO₂, and lead are localized pollutants. PM can be both a local and a regional pollutant, depending on its composition. As discussed above, the primary criteria pollutants of concern in the study area are ozone (including ROG and NO_x), SO_x, CO, and PM (Note: DPM is a component of PM).

Table 3.2-5. San Diego County Screening-Level Thresholds

Air Contaminant	Emission Rate		
	(Pounds per Hour)	(Pounds per Day) ¹	(Tons per Year)
Respirable Particulate Matter (PM ₁₀)	—	100	15
Fine Particulate Matter (PM _{2.5}) ²	—	55	10
Nitrogen Oxides (NO _x)	25	250	40
Sulfur Oxides (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead (Pb) ³	—	3.2	0.6
Volatile Organic Compounds (VOC) ⁴	—	75	13.75

Source: SDAPCD 2019, 2021.

¹ According to the County of San Diego, the daily SLTs are most appropriate when assessing impacts from standard construction and operational emissions. Therefore, daily SLTs are used to evaluate project significance; hourly and annual SLTs are provided for informational purposes only.

² Based on EPA's Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards, published September 8, 2005, and SCAQMD's air quality significance thresholds (SCAQMD 2023).

³ Lead and lead compounds.

³ When 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.

- ⁴ The SDAPCD air quality impact analysis does not include trigger levels for VOCs/ROGs. The County of San Diego recommends using thresholds established by SCAQMD; the City of San Diego's recommendation is to use thresholds recommended by the SCAQMD and the Monterey Bay Unified Air Pollution Control District, which has a federal and state attainment status similar to that of San Diego. Note that the City of San Diego's thresholds are 137 pounds per day as of the 2022 adopted guidelines. Therefore, because the County of San Diego's recommended threshold of 75 pounds per day is lower than the City of San Diego's recommended threshold of 137 pounds per day, to be conservative, the County of San Diego's recommendation is used herein.
- ⁵ Note that 13.7 tons per year threshold is based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.

Regional Project-Generated Criteria Pollutants (Ozone Precursors and Regional PM)

Adverse health effects induced by regional criteria pollutant emissions generated by the project (O₃ precursors and PM) are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, gender]). For these reasons, ozone precursors (ROGs and NO_x) contribute to the formation of ground-borne ozone on a regional scale. Emissions of ROGs and NO_x generated in one area may not equate to a specific ozone concentration in that same area. Similarly, some types of particulate pollutant may be transported over long distances or formed through atmospheric reactions. As such, the magnitude and locations of specific health effects from exposure to increased ozone or regional PM concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project.

Models and tools have been developed to correlate regional criteria pollutant emissions to potential community health impacts. Although models are capable of quantifying ozone and secondary PM formation and associated health effects, the tools were developed to support regional planning and policy analysis and have limited sensitivity to small changes in criteria pollutant concentrations induced by individual projects. Therefore, translating project-generated criteria pollutant emissions to the locations where specific health effects could occur or determining the resultant number of additional days of nonattainment cannot be estimated with any degree of accuracy with currently available tools.

The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates there are known safe concentrations of criteria pollutants. Although recognizing that air quality is a cumulative problem, air districts typically consider projects that generate criteria pollutant and ozone precursor emissions below these thresholds to be minor in nature and would not adversely affect air quality such that the NAAQS or CAAQS would be exceeded. Emissions generated by the project could increase photochemical reactions and the formation of tropospheric ozone and secondary PM, which at certain concentrations could lead to increased incidence of specific health consequences. Although these health effects are associated with ozone and particulate pollution, the effects are a result of cumulative and regional emissions. As such, a project's incremental contribution cannot be traced to specific health outcomes on a regional scale, and a quantitative correlation of project-generated regional criteria pollutant emissions to specific human health impacts is not included in this analysis.

The thresholds presented in Table 3.2-5 consider existing air quality concentrations and attainment or nonattainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates there are known safe concentrations of criteria pollutants. Accordingly, the proposed project would expose receptors to substantial regional pollution if any of the thresholds summarized in Table 3.2-5 are exceeded.

Localized Project-Generated Criteria Pollutants, Air Toxics (DPM), and Odors

Localized pollutants generated by a project affect populations near the emissions source. Because these pollutants are not transported over long distances and do not undergo complex photochemical or atmospheric reactions (notwithstanding secondary PM_{2.5} formation), emissions from individual projects can result in direct and material health impacts on adjacent sensitive receptors. Models and thresholds are readily available to quantify these potential health effects and evaluate their significance (CAPCOA 2009; OEHHA 2015; CARB 2000). Locally adopted thresholds and analysis procedures for the localized pollutants of concern associated with the proposed project (CO, PM, SO₂, DPM,⁴ and asbestos) are identified below. Thresholds for odors are also discussed.

Carbon Monoxide, Particulate Matter, and Sulfur Dioxide

SDAPCD Regulation II, Rules 20.2 and 20.3, identify AQIA analysis triggers for CO, PM, and SO_x. These trigger levels consider basin-wide effects of CO, PM, and SO_x emissions with respect to the attainment of ambient air quality standards. CO, PM, and SO_x emissions below the trigger levels would not adversely affect air quality such that the NAAQS or CAAQS would be exceeded. Accordingly, projects that generate CO, PM, and SO_x emissions below SDAPCD's air quality trigger levels, as presented in Table 3.2-5, would not contribute to a significant localized air quality impact.

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below state and federal CO standards. When ambient levels are below the standards, a project is considered to have a significant impact if its emissions result in an exceedance of one or more of the standards. When ambient levels already exceed a state or federal standard, project emissions are considered significant if they increase 1-hour CO concentrations by 1.0 parts per million (ppm) or more or 8-hour CO concentrations by 0.45 ppm or more (SCAQMD 1993). The following are applicable local emission concentration standards for CO:

- CAAQS and NAAQS 1-hour CO standards of 20 and 35 ppm, respectively
- CAAQS and NAAQS 8-hour CO standard of 9.0 and 9 ppm, respectively

As in most urban areas, high short-term concentrations of CO, known as hot spots, can occur in San Diego County. Hot spots typically occur in areas with high motor vehicle use, such as parking lots, congested intersections, and highways. Because elevated CO concentrations typically occur at locations with high traffic volumes and congestion, elevated CO concentrations are often correlated with the level of service (LOS) at intersections. LOS, which expresses the congestion level for an intersection, is designated by a letter from A to F, with LOS A representing the best operating conditions and LOS F the worst. Significant concentrations of CO sometimes occur, depending on temperature, wind speed, and other variables, at intersections where LOS is rated at D or worse. Projects that do not generate CO concentrations in excess of the health-based CAAQS would not contribute a significant level of CO such that localized air quality and human health would be substantially degraded.

In order to assess the potential for CO hot spots at nearby intersections, the analysis herein uses the County of San Diego's CO hot spot screening criteria. According to the criteria, any project that would place receptors within 500

⁴ DPM is the primary TAC of concern for mobile sources. Of all controlled TACs, emissions of DPM are estimated to be responsible for about 70% of the total ambient TAC risk (CARB 2000). Given the risks associated with DPM, tools and factors for evaluating human health impacts from project-generated DPM have been developed and are readily available. Conversely, tools and techniques for assessing project-specific health outcomes as a result of exposure to other TACs (e.g., benzene) remain limited. These limitations impede the ability to evaluate and precisely quantify potential public health risks posed by TAC exposure.

feet of a signalized intersection where the number of peak-hour trips exceeds 3,000 and operations are at or below LOS E must conduct a hot spot analysis for CO. Likewise, projects that cause an intersection to operate at or below LOS E where the number of peak-hour trips exceeds 3,000 must also conduct a CO hot spot analysis.

Diesel Particulate Matter

DPM differs from other air toxics in that it is a complex mixture of hundreds of substances rather than a single substance. DPM is typically composed of carbon particles (i.e., “soot,” also called black carbon) and numerous organic compounds, including more than 40 known cancer-causing organic substances such as polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Because more than 90% of DPM is less than 1 micrometer (µm) in diameter (about 1/70th the diameter of a human hair), the majority of DPM is small enough to be inhaled into the lungs. Larger deposits can lodge in the deepest regions of the lungs. These are the regions that are most susceptible to injury. Health effects associated with exposure to DPM 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 (CARB 2023d).

SDAPCD Regulation XII, Rule 1200, establishes permitting standards for new sources of DPM and other TACs. SDAPCD’s Rule 1200 includes different risk thresholds, depending on whether the source of the TACs applied T-BACT. SDAPCD considers any TAC emissions source that has been permitted by SDAPCD to result in less-than-significant TAC impacts because TAC emissions from a permitted source would be required to meet the risk thresholds established in Rule 1200 in order to obtain a permit. For determination of significant impacts from project-related health risks, any source or group of sources not permitted by SDAPCD, such as a construction fleet used for a project’s construction phase, should be evaluated with respect to the risk thresholds identified in Rule 1200. Consistent with Rule 1200, SDAPCD considers projects that would generate emissions of TACs to result in potentially significant health risks for sensitive receptors if the health risk assessment (HRA) conducted for project shows that TAC concentrations would result in the following:

- A maximum incremental cancer risk (MICR) greater than 1 in 1 million without application of T-BACT,
- An MICR greater than 10 in 1 million with application of T-BACT, or
- A chronic and acute non-cancer health hazard index greater than 1.0

SDAPCD considers the above thresholds suitable for determining the cumulative impact of TACs as well. CARB (2005) consistently indicates that source-receptor distances of 1,000 feet substantially reduce health risks on sensitive receptors in the general vicinity of TAC sources. As such, individual projects that would be implemented in areas more than 1,000 feet from an emissions source would not have the potential to expose sensitive receptors to substantial pollutant concentrations.

Asbestos

There are no quantitative thresholds related to receptor exposure to asbestos. However, SDAPCD’s rules and regulations require the demolition or renovation of structures with asbestos-containing building materials to be carried out in compliance with the National Emission Standards for Hazardous Air Pollutants, as listed in the Code of Federal Regulations. As such, all projects that comply with the rules and regulations are considered to result in less-than-significant impacts with respect to asbestos-containing materials.

Odors

There are no quantitative thresholds related to odors. However, SDAPCD recommends compliance with Rule 51 to ensure no significant odor impacts. In addition, CARB generally discourages siting new receptors within 1,000 feet of odor-generating facilities such as landfills, sewage treatment plants, and refineries.⁵ As such, projects that comply with Rule 51 and do not site new receptors within 1,000 feet of odor-generating facilities would result in less-than-significant impacts. In addition, projects with dust emissions that do not exceed the PM₁₀ and/or PM_{2.5} thresholds would not result in a significant impact.

3.2.4.2 Methodology

Air quality impacts associated with construction and operation of the proposed project were assessed and quantified (where applicable) using standard and accepted software tools, techniques, and emission factors. A summary of the methodology is provided below. The methodology used to estimate air quality emissions, discussed below, is the same as that used to estimate GHG emissions, as described in Section 3.7, Greenhouse Gas Emissions, of this Draft EIR.

Construction

Construction of the project would generate emissions of ROG, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} that would result in short-term impacts on ambient air quality in the study area. To provide the most conservative analysis, maximum daily emissions were assessed from the following construction activities: off-road equipment exhaust, building construction, on-road vehicle exhaust (from workers' vehicles, vendors' vehicles, and haul trucks), and site-grading and earth-movement activities, and related fugitive dust. Fugitive off-gassing emissions would result from paving activities and the application of architectural coatings. The project would have three development components, consisting of Residential West, Residential North, and the Golf Course and Clubhouse. Some construction activities would occur sequentially (e.g., site preparation, grading, building construction) and some simultaneously (e.g., road construction, grading and building construction, paving, architectural coating). Construction Equipment Assumptions are presented in Appendix B1, *Air Quality Assessment*, and includes a summary of the assumed equipment that would be involved in each stage of construction. Modeling took into account standard construction best management practices such as the application of water twice daily, a 15 mph speed limit on unpaved surfaces, and the use of low-VOC architectural coatings.

Criteria pollutant emissions from construction heavy-duty equipment, on-road vehicles, asphalt paving, building construction, architectural coatings, and land disturbance were estimated using a spreadsheet approach that incorporated methodologies and data consistent with the California Emissions Estimator Model (CalEEMod), version 2022.1.1.29. For mobile emissions from construction, the modeling used emission factors from EMFAC2021, version 1.0.2. The construction analysis was based on a combination of project-specific information provided by the applicant as well as default assumptions generated by CalEEMod, version 2022.1.1.29. Construction is

⁵ CARB also recommends avoiding siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. However, this recommendation is out of concern for health risks as opposed to odors.

expected to begin in the middle of 2025 and be completed by early 2029.^{6,7} Further details regarding construction phasing are provided in Appendix B1, *Air Quality Assessment*.

Construction activities associated with the project would generate TAC emissions in the form of diesel exhaust PM₁₀ emissions. This would expose nearby land uses to TAC emissions in the form of DPM from the use of diesel-powered equipment and trucks.

An HRA was prepared for the proposed project as part of the Air Quality Assessment and the model inputs and outputs can be found within Appendix B1. The HRA was conducted to evaluate the potential health impacts that may result from the exposure of nearby sensitive receptors to the project's construction-related DPM emissions. The HRA was performed with use of EPA's American Meteorological Society/Environmental Protection Agency Regulator Model (AERMOD), carcinogenic and chronic risk assessment values from OEHHA, as well as assumptions for model inputs from SCAQMD. The HRA takes into account OEHHA's most recent *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments* guidance and calculation methods, as adopted by OEHHA in March 2015 (OEHHA 2015). The HRA consists of three parts: (1) a DPM inventory, (2) air dispersion modeling, and (3) risk calculations. A description of each of these parts follows.

DPM Inventory

The DPM inventory includes emissions associated with the project's short-term construction activities. Consistent with OEHHA guidance, DPM emissions were assumed to be equal to emissions of exhaust PM₁₀ from diesel sources. Thus, the DPM emissions inventory uses the same methodology as the mass emissions analysis previously discussed for identifying mass daily criteria pollutant emissions, based on the diesel PM₁₀ exhaust emissions generated by the project. All PM₁₀ exhaust from off-road diesel equipment during construction was assumed to be DPM. These exhaust emissions were converted to a diesel exhaust emission rate (in grams per second) and applied to the air quality dispersion modeling results to determine the DPM concentrations at the nearest sensitive receptors.

Air Dispersion Modeling

The HRA used USEPA's dispersion model, AERMOD, to model annual average concentrations at nearby receptors. Details on modeling inputs and methods, including the emission rate (in grams per second per square meter) and source are provided in Appendix B1, *Air Quality Assessment*. Meteorological data for the dispersion modeling was based on monitoring data from SDAPCD's El Cajon station, which is approximately 5 miles southeast of the project site. The pre-processed meteorological data from this station was collected for 2012.

On-site construction emissions for the project were characterized as three separate area sources with a release height of 3 meters (9.84 feet). Modeling for emissions from construction activities was based on the total construction emissions in tons divided by the total duration of construction (3.44 years), which is the worst-case scenario. Table 3.2-6 summarizes the source parameters used for off-road sources in the construction HRA. The construction DPM emissions and figures highlighting the construction footprint modeled in the Air Quality Assessment can be seen in Appendix B1.

⁶ Modeling earlier construction timeframe does not change the analysis.

⁷ Construction equipment fleets become cleaner in future years as Tier 4 Final equipment replace older construction equipment in the default construction fleet mix. Thus, modeling an earlier construction year is deemed conservative and is likely overestimating construction emissions versus later years.

The project site is in an urbanized area surrounded by a mix of land uses, with the nearest sensitive receptors being single-family residential uses. The nearest existing sensitive receptors are the single-family homes adjacent to the project's northern boundary. These receptor locations were modeled in AERMOD as discrete receptors, with a receptor height of 1.5 meters to evaluate ground-level concentrations.

The dispersion modeling analysis also included terrain data to accurately assess impacts in three dimensions. The terrain data used for the analysis consisted of USGS National Elevation Dataset (NED) data, as downloaded in AERMOD for the project site. The urban modeling option was selected in AERMOD to account for the effects of increased surface heating from an urban area on pollutant dispersion under stable atmospheric conditions. Under the urban modeling option, all sources must be modeled with urban effects, using the population of the city where a project would be located. Finally, because the focus of an HRA is to evaluate cancer risks, which are based on long-term exposures, the annual average concentration of DPM at receptor locations over the entire 3 years with meteorological data was modeled in AERMOD for the project's approximately 58-month construction period.

A complete list of dispersion modeling and risk calculation inputs is provided in Appendix B1, *Air Quality Assessment*.

Table 3.2-6. Off-Road Equipment Modeling Parameters

Construction Area	Source Type ^{1, 2, 3}	Release Height (Meters) ⁴	Emission Rate per Area Source (g/s-m ²)
Residential North	Area	3	4.13E-09
Residential West	Area	3	2.25E-09
Golf Course/Club House/Hotel	Area	3	8.60E-09
Residential North (Mitigated)	Area	3	5.04E-10
Residential West (Mitigated)	Area	3	3.25E-10
Golf Course/Club House/Hotel (Mitigated)	Area	3	1.02E-09

Notes: g/s-m² = grams per second per square meter

¹ An area source is a source developed based on the site area.

² Emissions sources encompass the footprint where construction activities would occur.

³ Source types are consistent with recommendations from SCAQMD.

⁴ Release heights, as well as initial vertical and lateral dimension values, were consistent with industry practice and recommendations from SCAQMD.

Risk Calculations

The health risk calculations conducted for the project incorporate OEHHA's latest guidance, which includes age-specific factors that account for increased sensitivity to carcinogens during early-in-life exposure (OEHHA 2015). The approach to estimating cancer risk from long-term inhalation, with exposure to carcinogens, requires calculating a range of potential doses and multiplying by cancer potency factors in units corresponding to the inverse dose to obtain a range of cancer risks. For cancer risk, the risk for each age group is calculated using the appropriate daily breathing rates, age sensitivity factors, and exposure duration. The cancer risks calculated for individual age groups are summed to estimate the cancer risk for each receptor.

The health risk factors used in this assessment are presented in Table 3.2-7. For each receptor, the determined annual DPM concentration was multiplied by the calculated dose factor (inhalation pathway only) and by 1 million to obtain the cancer risk, in chances per million. Construction is anticipated to last approximately 3.44 calendar years. Thus, the construction risk assessment assumes exposure begins in the third trimester, lasting for 0.25 years

(3 months), followed by a 2-year exposure period occurring in the 0 to <2 age bin (24 months), and the remaining 1.19 years (approximately 14 months) occurring in the 2 to <9 age bin. The fraction of time at home for all age bins is set at 1.0.

Table 3.2-7. Exposure Factors by Age Group

Parameter	Abbreviations	Third Trimester	0 to <2	2 to <9
Daily Breathing Rate (mg/kg/day)	DBR	361	1,090	861
Inhalation Absorption Factor (unitless)	A	1	1	1
Exposure Frequency (unitless)	EF	0.96	0.96	0.96
Conversion Factor (µg to mg, L to m³)	CF	1.00E-06	1.00E-06	1.00E-06
Age Sensitivity Factors (unitless)	ASF	10	10	3
Exposure Durations (years)	ED	0.25	2	2.62
Averaging Time for Lifetime (years)	AT	70	70	70
Fraction of Time at Home (unitless)	FAH	1	1	1
Cancer Conversion Factor (unitless)	CCF	1.00E+06	1.00E+06	1.00E+06
DPM Cancer Potency Factor (mg/kg-day ⁻¹)	CPF	1.1	1.1	1.1

Notes: mg = milligram; kg = kilogram; µg = microgram; L=liter; m³ = cubic meter.

Operation

Operation of the proposed project would result in the generation of criteria pollutant emissions, including emissions associated with motor vehicle travel to and from the site, natural gas combustion for cooking and heating, and area sources associated with consumer products (e.g., cleaning supplies, kitchen aerosols, cosmetics, toiletries), architectural coatings, and landscaping equipment.

Criteria pollutant emissions associated with project land uses were estimated using CalEEMod, version 2022.1.1.29. The energy consumption and area source activity rates were based on CalEEMod, version 2022.1.1.29, defaults. Mobile-source emissions were based on the daily vehicle trips provided by the project’s local transportation analysis (Intersecting Metrics 2024) and SDAPCD vehicle fleet emission factors. This analysis used a full buildout year of 2029.

Although some existing components would be redeveloped (e.g., golf course, hotel, clubhouse), this analysis conservatively evaluated the project’s emissions to be new emissions. Please refer to Appendix B1, *Air Quality Assessment*, for operational modeling outputs and detailed assumptions.

Project Design Features

The following project design features (PDFs) are relevant to the quantification of GHG emissions. However, the PDFs are also identified in this air quality analysis for informational purposes. Reductions to natural gas from the project would be the only PDF to reduce air quality emissions (PDF-3, Electric-Only Uses). (For the full text of the PDFs listed below, see Chapter 2, Project Description.)

PDF-1: California Energy Code

PDF-2: CALGreen Code

PDF-3:	Electric-Only Uses
PDF-4:	Energy Star Appliances
PDF-5:	Low-Flow Water Appliances
PDF-6:	Recyclables and Yard Waste
PDF-7:	Residential Electric Vehicle Charging
PDF-8:	Non-Residential Electric Vehicle Charging
PDF-9:	Tree Planting
PDF-10:	On-Site Solar Energy Generation

3.2.5 Project Impacts and Mitigation Measures

Threshold 1: Would the proposed project conflict with or obstruct implementation of the applicable air quality plan?

Impact Discussion

As shown in Table 3.2-4, San Diego County is currently designated as a nonattainment area for the federal and state 8-hour ozone standards as well as the state ozone, PM₁₀, and PM_{2.5} standards. The RAQS is the region’s plan for improving air quality and attaining federal and state air quality standards. The RAQS relies on information from CARB and SANDAG to project future emissions and determine appropriate emissions reduction strategies. Emissions projections are based on population, vehicle types, and land use plans developed by the incorporated cities and the County of San Diego. As such, projects that propose development that is consistent with the growth anticipated by SANDAG would be consistent with the RAQS. SDAPCD has also adopted an ozone maintenance plan. The RAQS and the SIP, both of which “provide the region’s documentation for improving air quality,” are periodically updated to reflect updated information on air quality, emission trends, and new feasible control measures. Every 3 years, the overall effectiveness of the RAQS must be addressed and submitted to the CARB in a report adopted at a public hearing (SDAPCD 1992). The housing forecasts are provided by the local jurisdictions and compiled by SANDAG and sent to SDAPCD. SDAPCD prepares the RAQS and Ozone Attainment Plan and provides those to CARB, as part of ongoing and routine programs that are beyond the purview of local jurisdictions.

A project would be deemed inconsistent with air quality plans if it were to result in population and/or employment growth that would exceed the estimates that were used to develop the applicable air quality plans and generate emissions that were not accounted for in the regional emissions budgets. Therefore, the proposed project was evaluated to determine its consistency with land use designations and the growth anticipated in the RAQS and ozone maintenance plan prepared for the San Diego region. Project emissions findings are further discussed in the *Impact Determination* section below.

The project is proposing development of the northern portion of the project site consistent with the City of Santee’s *General Plan* and zoning designation of Planned Development (PD). This designation is intended for certain properties within the City where a variety of development opportunities may be viable, consistent with the guidelines contained in Section 5.5, Areas for Special Study, in the Land Use Element of the General Plan for each respective planned

development designated property. The project is proposing residential uses as accessory to the primary recreational use consistent with Section 5.5 of the Land Use Element. Moreover, the proposed residential uses, including multiple-family and single-family attached, are consistent with the Planned Development (PD) District zoning designation (see City of Santee 2017, Table 13.19.030A). Finally, the density proposed is consistent with what is allowed under the City's residential land use districts (R-7- R-14) for the type of residential development being proposed for the project. Therefore, the project is consistent with the Santee General Plan and the PD zone because it is proposing to develop accessory residential uses that fall within the type of residential uses allowed per the PD zone and within the density ranges allowed in the PD zone. The project is also proposing development on the southern portion consistent with the Park/Open Space (P/OS) designation and zone. The portion of the project located in the City of San Diego would consist of redeveloping the existing golf course, which is consistent with the City of San Diego's *General Plan* designation and zoning. The RAQS relies on 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 and specific plans. As discussed in Section 3.13, Population and Housing, the proposed project would result in a direct increase in the number of net new residents in the City of Santee (i.e., 686 new residents). The proposed project would not include any new land uses in the City of San Diego that would be growth inducing or include on-site residents. Given that the 2016 population within the City of Santee was 56,434, the addition of 686 net new residents would represent an approximately 1.2% increase (SANDAG 2022). By 2050, the City of Santee's population is expected to grow to 63,070, an increase of 6,636, or 11.8% (SANDAG 2022). The effect on the overall anticipated population is important when as here, development is consistent with and anticipated in the City's General Plan. Therefore, it is important to note that the project's net increase would be well below the City of Santee's expected growth rate from 2020 to 2050; therefore, such an increase would be within population growth forecasts for the City and assumed by the RAQS. Because the project would be consistent with population growth estimates that were used to develop the SIP and RAQS the proposed project would not interfere with the SDAPCD's goals for improving air quality in the SDAB. Moreover, the project is in compliance with the air quality standards as described below and would not result in a significant air quality impact with regard to construction- and operational-related emissions of ozone precursors or criteria air pollutants. Project construction would require short-term workers. The number of construction workers employed and working on site would vary over the course of the construction period. The City of Santee and the City of San Diego have a large pool of construction labor from which to draw within commuting distance of the project site. In addition, because of the highly specialized nature of most construction projects, workers are likely to be employed on the job site only for as long as their skills are needed to complete a particular phase of the construction process. For those reasons, it is reasonable to assume that most construction workers would not relocate their households to work on the proposed project.

The proposed project's operations would also slightly increase employment within the City of Santee because the project site currently consists of an operating hotel and golf course facilities. Based on SANDAG estimates, the City of Santee had 18,186 jobs in 2016. By 2050, the City of Santee would have 25,997 jobs, resulting in an increase of 7,811, or 43%. The proposed project would redevelop the existing golf course, hotel, and clubhouse and add a restaurant. These existing uses already have staff members associated with them. A net increase in employment would result from the new restaurant at the project site. Employment at the restaurant would represent a negligible increase that would be well within employment forecasts, which estimate that an additional 7,811 people would work in the City of Santee by 2050 (SANDAG 2022). Thus, the project would not be inconsistent with the employment growth estimates that were used to develop the SIP and RAQS.

As shown in Table 3.2-8, construction of the project would not exceed the SDAPCD and the County of San Diego's daily thresholds for any criteria air pollutants. In addition, the project's operational emissions would not exceed the SDAPCD and the County of San Diego's daily thresholds. The project's population and employee numbers

would be consistent with the City of Santee's expected growth, and its construction and operational emissions would not exceed the SDAPCD and County of San Diego's thresholds.

The proposed project would increase population and employment within the City of Santee, consistent with the employment or growth estimates that were used to develop the SIP and RAQS, and the uses are consistent with the City of Santee's General Plan.

In addition, as stated in Table 3.2-8, SDAPCD air quality impacts are less than significant. Therefore, for the reasons described above, the proposed project would not conflict with any air quality plans. Therefore, air quality impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would the proposed project result in a cumulatively considerable net increase in any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard?

Impact Discussion

Construction

The proposed project would result in the generation of criteria pollutants emissions during short-term construction activities and long-term operations. San Diego County is designated as nonattainment area for ozone, PM₁₀, and PM_{2.5} under federal and/or state ambient air quality standards. The sections below provide a discussion of the potential impacts related to the project's regional construction and operational emissions.

Construction associated with the proposed project would generate criteria pollutant emissions from fuel combustion associated with off-road equipment and vehicle trips made by workers, vendors' material delivery trucks, and haul trucks traveling to and from the site. In addition, fugitive dust would be generated from demolition, grading, and excavation activities as well as on-site and off-site vehicle travel. Off-gassing emissions of VOCs would result from paving and the application of architectural coatings. These construction activities have the potential to temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring simultaneously. To provide the most conservative analysis, maximum daily emissions estimates were used to assess the project's impacts.

The modeled maximum daily emissions of criteria air pollutants and ozone precursors associated with construction of the project are presented in Table 3.2-8. As shown therein, construction emissions generated by the project would not exceed any SDAPCD thresholds. It should be noted that during grading operations, dust would be managed per the City of Santee's Grading Ordinance (see Section 11.40.565 of Santee's Municipal Code), and dust control would include the following:

- Apply water to graded areas to prevent visible dust emissions.

- Use mulch, gravel, or soil binders on inactive areas.
- Maintain vehicle speeds below 15 mph on unpaved areas.
- Install wheel wash stations or track-out control devices at exits
- Maintain access roads with water or paving to reduce dust
- Cease grading if wind speeds exceed safe dust control limits (usually >25 mph)

The project would prepare a list of best management practices to reduce dust at the time grading permits are issued in compliance with the City of Santee’s Municipal Code. Dust control measures were not assumed in this analysis to be conservative. Therefore, because construction emissions would not exceed the County of San Diego’s thresholds, impacts would be less than significant.

Table 3.2-8. Unmitigated Project Construction Emissions (Pounds per Day)

	Maximum Daily Pollutant Emissions					
	ROG	NO _x	CO	SO _x	PM ₁₀ Total	PM _{2.5} Total
Maximum Daily Emissions	39.9	45.7	53.4	0.11	11.9	4.53
SDAPCD Threshold	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No

Source: Modeling output provided in Appendix B1, *Air Quality Assessment*.

Notes: ROG = reactive organic gas; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; SDAPCD = San Diego Air Pollution Control District.

Totals may not sum precisely because of rounding.

Table 3.2-8 shows the maximum daily unmitigated emissions of project construction. As shown in Table 3.2-8, maximum daily criteria pollutant emissions would be below the County of San Diego’s significance thresholds. Because construction-related criteria pollutant emissions associated with the proposed project would be below the County of San Diego’s significance thresholds, criteria pollutant emission impacts would be less than significant. As such, construction emissions would not be expected to contribute a significant level of air pollution such that regional air quality within the SDAB would be degraded. However, as discussed below in Threshold 3, **Mitigation Measure (MM) AQ-1** would be required to reduce localized health impacts to less-than-significant levels. For reference, **MM-AQ-1** would require heavy-duty, diesel-powered construction equipment used during construction to meet at least Tier 4 Final engine emission standards. As such, **MM-AQ-1** would reduce emissions of criteria pollutants during construction. Construction of the proposed project would not exceed the County of San Diego’s daily threshold for any criteria pollutant, and impacts would be less than significant.

Mitigated project construction emissions are provided in Table 3.2-9.

Table 3.2-9. Mitigated Project Construction Emissions (Pounds Per Day)

	Maximum Daily Pollutant Emissions					
	ROG	NO _x	CO	SO _x	PM ₁₀ Total	PM _{2.5} Total
Maximum Daily Emissions	39.3	12.7	67.2	0.11	10.2	2.98
SDAPCD Threshold	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No

Source: Modeling output provided in Appendix B1, *Air Quality Assessment*.

Notes: ROG = reactive organic gases; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; SDAPCD = San Diego Air Pollution Control District.

Totals may not add exactly because of rounding.

Operations

Implementation of the project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with energy sources (e.g., natural gas consumption), area sources (e.g., landscaping activities, re-applications of architectural coatings, use of consumer products), and mobile sources. As described previously, the existing golf course, hotel, and clubhouse portions of the project site would be redeveloped as part of the project. The project's operational emissions would be conservatively evaluated as all new emissions and would not take credit for existing emissions from current land uses. The project's estimated annual operational emissions are presented in Table 3.2-10 and compared to the SDAPCD's operational criteria pollutant thresholds. Model outputs are provided in Appendix B1, *Air Quality Assessment*.

Table 3.2-10. Maximum Daily Operational Emissions (Pounds Per Day)

Source	Estimated Daily Regional Pollutant Emissions					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Project Total	24.4	8.75	121	0.2	18.3	4.75
SDAPCD Threshold	75	250	550	250	100	55
Exceeds Thresholds?	No	No	No	No	No	No

Source: Modeling output provided in Appendix B1, *Air Quality Assessment*.

Notes: ROG = reactive organic gases; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; SDAPCD = San Diego Air Pollution Control District.

Totals may not add exactly because of rounding.

As shown in Table 3.2-10, operational criteria pollutant emissions associated with the proposed project would be less than the SDAPCD's significance thresholds. As such, operational emissions would not be expected to contribute a significant level of air pollution such that regional air quality within the SDAB would be degraded.

Impact Determination

Construction and operation of the proposed project would result in emissions of PM₁₀ and PM_{2.5}, as well as NO_x and ROG, which are precursors to ozone. However, because neither construction nor operation of the proposed project would result in emissions that would exceed the SDAPCD's SLTs, emissions would not be at levels that would result in a cumulatively considerable increase in criteria pollutants for which the project region is in nonattainment status. The emissions levels would not be expected to contribute a significant level of air pollution such that regional air quality within the SDAB would be degraded. Thus, implementation of the proposed project would not result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation during project construction or operations.

Furthermore, short-term emissions associated with construction generally result in near-field impacts. In particular, with respect to local impacts, the consideration of cumulative construction particulate (i.e., PM₁₀ and PM_{2.5}) impacts would be limited to cases where projects constructed simultaneously are within a few hundred yards of each other because: (1) the combination of the short range (distance) of particulate dispersion (especially when compared to

gaseous pollutants); and (2) the SDAPCD's required dust control measures, which further limit particulate dispersion from a project site. Based on the cumulative projects identified in Figure 3-1, Cumulative Projects, in Chapter 3, Environmental Analysis, there are no known projects within 1,500 feet of the proposed project where major construction would occur concurrently with the project. Thus, the project would not contribute to a cumulative considerable net increase of criteria pollutants and impacts would be less than significant.

Mitigation Measures

No mitigation is required. However, **MM-AQ-1** (Tier 4 Final Construction Equipment), discussed in Threshold 3, would help lower the project's construction air emissions.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: Would the proposed project expose sensitive receptors to substantial pollutant concentrations as follows:

- a. *Would the project place sensitive receptors near CO "hot spots" or create CO "hot spots" near sensitive receptors?*
- b. *Would project implementation result in exposure to TACs resulting in a maximum incremental cancer risk greater than one in one million without application of Toxics-Best Available Control Technology (T-BACT) or a health hazard index greater than one?*

Impact Discussion

Land uses with sensitive receptors are defined as residences, schools, hospitals, resident care facilities, day-care centers, or other facilities that may house individuals with health conditions who would be adversely affected by changes in air quality. The necessary sensitive receptor are residential uses located approximately 15 feet to the north of the project boundary. The primary pollutants of concern with regard to health risks for sensitive receptors are criteria pollutants—specifically, CO at potential intersection hot spots, asbestos, and DPM. Each of these topics is analyzed in the paragraphs that follow.

Localized Carbon Monoxide Hot Spots

A CO hot spot is a localized concentration of CO that is above the state or national 1-hour or 8-hour ambient air standards for the pollutant. Projects that do not generate CO concentrations in excess of the health-based CAAQS would not contribute a significant level of CO such that localized air quality and human health would be substantially degraded. The assessment of the potential for the project to result in localized CO impacts at intersections from additional traffic volumes is based on SDAPCD's suggested criteria, which recommend performing a localized CO impact analysis for intersections that operate at or below LOS E (County of San Diego 2007).

According to the local transportation analysis, all intersections where the proposed project would add more than 50 peak-hour trips currently operate at an acceptable LOS of D or better and are projected to operate at LOS D or better under Horizon Year 2035 conditions, with the exception of three intersections for the project (Intersecting Metrics 2024). These include the following:

- **West Hills Parkway and Mast Boulevard (San Diego):** This intersection is anticipated to operate at LOS F during the AM peak hour under both without-project and with-project conditions. The addition of proposed project traffic would increase the overall intersection delay by 1.2 seconds during the AM peak hour. However, based on the traffic guidelines, this increase does not critically affect the intersection.
- **Carlton Hills Boulevard and Carlton Oaks Road (Santee):** This intersection is anticipated to operate at LOS E during the AM peak hour under both without-project and with-project conditions. The addition of proposed project traffic would increase the overall intersection delay by 0.8 second in the AM peak hour, which would not affect the intersection.
- **Carlton Hills Boulevard and Mission Gorge Road (Santee):** This intersection is also anticipated to operate at LOS E during the AM peak hour under both without-project and with-project conditions. The addition of proposed project traffic would increase the overall intersection delay by 1.0 second in the AM peak hour, which would not affect the intersection.

While these intersections would operate at LOS E or F under Horizon Year 2035 conditions, the incremental delays caused by the proposed project are minimal and would not affect the intersection, because the delay from the project would be less than 2 seconds.⁸ Note that the Intersection Operations Worksheets (Appendix B3) indicate that, based on the standards provided and the negligible increase in traffic delay, the peak-hour volumes generated by the proposed project would not trigger delays suitable to generate significant increases in CO for the proposed project (1.2 seconds). Therefore, impacts related to exposure to CO hotspots at congested roadways during Horizon Year 2035 would be less than significant, and no mitigation measures are required.

Toxic Air Contaminants

Asbestos

Asbestos is a naturally occurring mineral that was previously used in building construction because of its heat resistance and strong insulating properties. Exposure to asbestos, however, has been shown to cause many disabling and fatal diseases, including lung cancer, mesothelioma, and pleural plaques. Demolition of the existing hardscape (i.e., asphalt and concrete) and buildings on the project site may expose workers and nearby receptors to asbestos if the material was used during construction of the original hardscape and buildings. However, the proposed project would comply with SDAPCD Rule 1206 (Asbestos Removal, Renovation, and Demolition), and a facility survey would be performed to determine the presence or absence of asbestos-containing materials (ACM) regardless of the age of the demolished buildings prior to the commencement of demolition operations.⁹ The purpose of this rule is to control emissions of asbestos into the atmosphere during demolition and building renovation. Because the applicant would be required to control asbestos emissions according to SDAPCD regulations, receptors would not be exposed to substantial asbestos risks, and impacts associated with asbestos emissions would be less than significant.

⁸ The 2-second additional delay from a project is historically used to identify potentially significant traffic impacts requiring mitigation when level of service is E or F, and not specifically related to CO concerns. CO hotspot impacts are more closely aligned with vehicle emissions, and since vehicle emissions standards continuously improve, the measured CO levels in San Diego County have steadily declined. Currently ambient CO emissions near the site at the City of El Cajon monitoring station are 0.9 PPM for the 8 hour standard and 1.1 for the 1-hour standard. Impacts would not occur unless the 1-hour standard of 20 ppm or the 8-hour average of 9 ppm is exceeded. A 1.2 second delay would not increase ambient 1-hour levels from 1.1 to 20 ppm or 8-hour ambient levels from 0.9 to 9.

⁹ Suspect ACM that will be removed, stripped, or disturbed by the renovation or demolition operations would be sampled and analyzed for asbestos content. Once the renovation or demolition notification has been submitted to SDAPCD, the facility survey would be made immediately available to SDACPD on request.

Criteria Air Pollutants

Adverse health effects induced by regional criteria pollutant emissions generated by the proposed project (i.e., ozone precursors and PM) are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, gender]). Ozone precursors (i.e., ROG and NO_x) contribute to the formation of ground-borne ozone on a regional scale. Emissions of ROG and NO_x generated in one area may not equate to a specific ozone concentration in that same area. Similarly, some types of particulate pollution may be transported over long distances or formed through atmospheric reactions. As such, the magnitude and locations of specific health effects from exposure to increased ozone or regional PM concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project. Moreover, exposure to regional air pollution does not guarantee that an individual would experience an adverse health effect—as discussed above, there are large individual differences in the intensity of symptomatic responses to air pollutants. These differences are influenced, in part, by the underlying health condition of an individual, which cannot be known.

As discussed above, models and tools have been developed to correlate regional criteria pollutant emissions to potential community health impacts. Although models are capable of quantifying ozone and secondary PM formation and associated health effects, these tools were developed to support regional planning and policy analysis and have limited sensitivity to small changes in criteria pollutant concentrations induced by individual projects. Therefore, translating project-generated criteria pollutants to the locations where specific health effects could occur or the resultant number of additional days of nonattainment cannot be achieved with any degree of accuracy.

The project would not result in a significant air quality impact with regard to construction- and operational-related emissions of ozone precursors or criteria air pollutants. Moreover, as discussed in Section 3.2.5, Project Impacts and Mitigation Measures, the proposed project would not be inconsistent with the employment or growth estimates that were used to develop the SIP and RAQS.

As discussed above, the County of San Diego's SLTs consider existing air quality concentrations and attainment or nonattainment designations under the NAAQS and CAAQS, which are informed by a wide range of scientific evidence that demonstrates that there are known safe concentrations for criteria pollutants. Although it recognizes that air quality is a cumulative problem, SDAPCD considers sources that generate criteria pollutant and ozone precursor emissions that are below the thresholds to be minor in nature. Therefore, they would not adversely affect air quality to the extent that the health-protective NAAQS or CAAQS would be exceeded. Regional emissions generated by a project could increase photochemical reactions as well as the formation of tropospheric ozone and secondary PM, which, at certain concentrations, could lead to increased incidences of specific health consequences. Although these health effects are associated with ozone and particulate pollution, the effects are a result of cumulative and regional emissions. All feasible mitigation is being applied to reduce construction and operational emissions of ozone precursors and PM to the extent possible. Therefore, as discussed in Threshold 2, criteria air pollutant emissions generated by implementation of the proposed project would be below the County of San Diego's SLTs. Health impacts associated with exposure to criteria air pollutants would be less than significant.

Diesel Particulate Matter

Exposures to TACs such as DPM can also cause chronic (long-term) and acute (short-term) related non-cancer illnesses such as reproductive effects, respiratory effects, eye sensitivity, immune effects, kidney effects, blood effects, central nervous system effects, birth defects, or other adverse environmental effects. Risk characterization

for non-cancer health risks is expressed as a hazard index (HI). The HI is a ratio of the predicted concentration of a project's emissions to a concentration considered acceptable to public health professionals, termed the reference exposure level (REL).

The proposed project is anticipated to generate DPM emissions, which is identified by the state and federal government as TACs or hazardous air pollutants. The risks associated with carcinogenic effects of DPM are typically evaluated based on a lifetime of chronic exposure (i.e., 24 hours per day, 7 days per week, 365 days per year for 70 years). DPM is the primary pollutant of concern with regard to health risks for sensitive receptors during project construction. Diesel-powered construction equipment as well as heavy-duty trucks for hauling would emit DPM that could expose nearby sensitive receptors to pollutants. The nearest sensitive receptors would be at the single-family homes adjacent to the project's northern boundary.

Health risk calculations were performed with use of a spreadsheet tool, consistent with OEHHA guidance. The spreadsheet tool incorporates algorithms, equations, and a variable, as described above and in the OEHHA guidance. It also incorporates the results from the AERMOD dispersion model.

Table 3.2-11 summarizes the carcinogenic and non-cancer risks for the maximum affected receptor, which is the worst-case scenario. As shown in Table 3.2-11, unmitigated non-cancer impacts would be below thresholds; however, unmitigated cancer risk estimates for the project would exceed the County of San Diego's threshold of 10 in 1 million. Therefore, mitigation is required.

Table 3.2-11. Unmitigated Construction Health Risk Assessment Results (Worst-Case Scenario)

Receptor Type	Cancer Risk (Cases per Million)	Chronic Hazard Index
Resident	68.81	0.034
SDAPCD Thresholds	10	1.0
Exceeds Threshold?	Yes	No

Note: SDAPCD = San Diego Air Pollution Control District.

With implementation of **MM-AQ-1**, the project's cancer risk would be reduced to less than 10 in 1 million, as shown in Table 3.2-12. As stated previously, **MM-AQ-1** would require heavy-duty, diesel-powered construction equipment during construction to meet at least Tier 4 Final engine emission standards. Therefore, construction health risk impacts would be less than significant with mitigation.

Table 3.2-12. Mitigated Construction Health Risk Assessment Results

Receptor Type	Cancer Risk (Cases per Million)
Resident	8.86
SDAPCD Thresholds	10
Exceeds Threshold?	No

Note: SDAPCD = San Diego Air Pollution Control District.

Operations

Future operation of the proposed development is not expected to result in substantial emissions of TACs or DPM since the uses mostly consist of residential, hotel, and commercial uses. The proposed project does not include

industrial activities or heavy diesel vehicle operations, which are typically the sources of significant emissions recommended to be analyzed by CARB regulations.

Therefore, impacts associated with operational TACs would be less than significant.

Impact Determination

Impact AQ-1: Implementation of the proposed project may expose sensitive receptors to substantial pollutant concentrations.

As shown in Table 3.2-11, the residential cancer risk during construction would exceed the County of San Diego's cancer risk threshold. Therefore, impacts could be significant, and mitigation would be required.

Mitigation Measures

MM-AQ-1. Tier 4 Final Construction Equipment. The project will require heavy-duty, diesel-powered construction equipment used during construction to meet at least Tier 4 Final engine emission standards.

Level of Significance After Mitigation

As shown in Table 3.2-12, the residential cancer risk during construction would not exceed the County of San Diego's cancer risk threshold following implementation of **MM-AQ-1**. Therefore, impacts would be less than significant with mitigation.

Threshold 4: Would the proposed project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact Discussion

Although offensive odors rarely cause any physical harm, they can be unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and air districts. According to CARB's *Air Quality and Land Use Handbook*, land uses associated with odor complaints typically include sewage treatment plants, landfill sites, recycling facilities, and manufacturing plants (CARB 2005). Odor impacts on residential areas and other sensitive receptors, such as hospitals, daycare centers, and schools, warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, work sites, and commercial areas.

Potential odor emitters during construction include diesel exhaust, asphalt paving, and architectural coatings. Construction-related activities near existing receptors would be temporary in nature. Furthermore, construction activities would not result in nuisance odors that would violate SDAPCD Rule 51. Potential odor emitters during operations would include exhaust from vehicles and fumes from the reapplication of architectural coatings. However, odor impacts would be limited to circulation routes, parking areas, and areas immediately adjacent to recently painted structures. Although such brief exhaust- and paint-related odors may be considered adverse, they would not affect a substantial number of people or rise to the level of a significant impact under CEQA. In addition, sewage odor may become a problem at the sewer lift station's wet well and the emergency storage structure, which is proposed for the far east end of the Residential West development. However, odors are not expected to be a problem at the sewer lift station for the following reasons (Carlton Oaks Homeowners Association 2023):

1. The wet well and emergency storage structure would be enclosed spaces;
2. The sewer lift station would be at the far east end of the Residential West development, so any odor generated would most likely dissipate prior to reaching occupied houses;
3. The sewer collection system would be small, so the time for sewage to travel from the far end of the development area to the lift station would be a matter of minutes, not hours; and
4. The collected sewage would be pumped out of the wet well at regular intervals throughout the day.

Because the project is not anticipated to result in new substantial or long-term odors, this impact would be less than significant.

Impact Determination

Implementation of the proposed project would not create objectionable odors affecting a substantial number of people. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.2.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would implementation of the proposed project conflict with or obstruct implementation of the applicable air quality plan?

The geographic context for the analysis of cumulative air quality impacts is the SDAB. The RAQS and SIP are intended to address cumulative impacts in the SDAB, based on the future growth predicted by SANDAG. Given that the 2016 population within the City of Santee was 56,434, the addition of 686 net new residents would represent an approximately 1.2% increase (SANDAG 2022). By 2050, the City of Santee's population is expected to grow to 63,070, an increase of 6,636, or 11.8% (SANDAG 2022). The project's net increase would be well below the City of Santee's expected growth rate from 2020 to 2050; therefore, such an increase would be within population growth forecasts for the City of Santee. Moreover, as described in Section 3.2.5, Project Impacts and Mitigation Measures, criteria air pollutant emissions generated by the proposed project would not exceed the SDAPCD SLTs for any criteria pollutant. Therefore, project

emissions would not be expected to contribute a significant level of air pollution such that regional air quality within the SDAB would be degraded. Therefore, because implementation of the proposed project would not conflict with or obstruct implementation of the RAQS or SIP, the proposed project would not result in a cumulatively considerable impact.

Cumulative Threshold 2: Would implementation of the proposed project result in a cumulatively considerable net increase in criteria pollutants?

The SDAB is currently designated as a nonattainment area for the following criteria air pollutants: PM₁₀, PM_{2.5}, and ozone. As discussed in Section 3.2.4.1, Thresholds of Significance, SDAPCD developed SLTs that identify the level of criteria pollutant emissions that would result in a significant impact related to attainment of the ambient air quality standards as well as regional air quality standards. As described in Section 3.2.5, Project Impacts and Mitigation Measures, criteria air pollutant emissions generated by the proposed project would not exceed the SDAPCD SLTs for any criteria pollutant. Thus, project emissions would not be expected to contribute a significant level of air pollution such that regional air quality within the SDAB would be degraded. Therefore, the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 3: Would implementation of the proposed project expose sensitive receptors to substantial pollutant concentrations?

Cumulative growth in the planning area, including the area for the cumulative projects presented in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, would have the potential to increase congestion and result in CO hot spots. However, as described in Section 3.2.5, Project Impacts and Mitigation Measures, the increase in the number of vehicle trips associated with implementation of the proposed project, in combination with cumulative trips, would not result in significant congestion at any intersection. Therefore, a significant cumulative impact related to CO hot spots would not occur.

The cumulative projects listed in Table 3-2, Cumulative Projects, would also have the potential to result in a significant cumulative impact associated with sensitive receptors if, in combination, they would expose sensitive receptors to a substantial concentration of TACs that would significantly increase cancer risk and non-cancer risk for sensitive receptors. As discussed in Section 3.2.5, TAC emissions, including DPM, generated during construction and operation of the proposed project would not result in a significant incremental increase in the cancer risk or non-cancer risk for the maximally exposed sensitive receptor after mitigation is applied. The cumulative projects surrounding the proposed project site would not be expected to result in significant emissions of TACs during construction or operations that would result in a significant cancer or non-cancer risk for sensitive receptors. As stated in Section 3.2.5, implementation of **MM-AQ-1** would reduce the cancer risk incurred by sensitive receptors as a result of project construction to less-than-significant levels. Therefore, cumulative projects, in combination with the proposed project, would not increase the risk of exposure to TAC sources due to project construction, and a significant cumulative impact would not occur. As such, the proposed project's contribution would not be cumulatively considerable, and sensitive receptors would not be exposed to substantial pollutant concentrations.

Cumulative Threshold 4: Would implementation of the proposed project create objectionable odors affecting a substantial number of people?

The geographic context for the analysis of impacts relative to objectionable odors is limited to the area immediately surrounding the odor source. It is not cumulative in nature because the air emissions that cause odors disperse beyond the sources of the odor. As the emissions disperse, the odor becomes decreasingly detectable. The cumulative projects surrounding the project site would not be expected to result in objectionable odors. In addition,

as discussed in Section 3.2.5, Project Impacts and Mitigation Measures, implementation of the proposed project would not generate a new source of objectionable odors during construction or operations that would affect a substantial number of people. Therefore, a cumulative impact would not occur, and the proposed project's contribution would not be cumulatively considerable.

3.2.7 Summary of Significant Impacts

Table 3.2-13 provides a summary of significant air quality and health risks impacts and mitigation measures.

Table 3.2-13. Summary of Significant Air Quality and Health Risks Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact AQ-1: Implementation of the proposed project may expose sensitive receptors to substantial pollutant concentrations.	Implementation of MM-AQ-1 would require heavy-duty, diesel-powered construction equipment used during construction to meet at least Tier 4 Final engine emission standards.	Less than significant.	Prior to implementation of MM-AQ-1 , the maximally exposed sensitive receptor would experience a cancer risk equal to 68.81 cases per million, which exceeds the County of San Diego cancer risk threshold of 10 cases per million. After implementation of MM-AQ-1 , the maximally exposed sensitive receptor would experience a cancer risk equal to 8.86 cases per million, which is below the applicable threshold.

3.2.8 References

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3.3 Biological Resources

3.3.1 Overview

This section describes the existing conditions, applicable policies and regulations related to biological resources and provides an analysis of impacts that may result from construction and operation of the proposed project. The information in this section is based on the *Biological Survey Report for the Carlton Oaks Country Club and Resort Project, Santee, San Diego County, California* (Biological Survey Report) dated May 2025 prepared for the proposed project, which is included as Appendix E to this Draft Environmental Impact Report (EIR).

3.3.2 Environmental Setting

The project site is located along the boundary between the City of Santee and the City of San Diego, situated north of State Route (SR) 52 where it traverses in an east-west direction. The project site is currently operating as the Carlton Oaks Country Club with an existing golf course, golf driving range, clubhouse, hotel, and banquet hall. The golf course covers most of the project site, with the clubhouse and related structures located in the north-central portion of the project site. The golf course includes two artificial water features not associated with Sycamore Creek.

The surrounding land uses consist of a mix of residential and commercial development, transportation corridors, and open space, which contains undeveloped areas within the upstream and downstream segments of the San Diego River. The northern boundary of the project site is bound by single-family homes and condominiums. The southern and eastern boundaries of the existing golf course abut the San Diego River (South Channel) and Forester Creek, adjacent to SR-52. The southern boundary of the site consists of a 10- to 12-foot-tall berm that separates the river channel from the golf course and is occasionally used as an informal recreation path. Some areas of the berm have eroded to 5 feet in height. To the west of the project site is West Hills Parkway and SR-52, with open space and general commercial uses west of these transportation corridors.

Unless otherwise referenced, the information in this section below summarizes the physical and biological characteristics of the site, as discussed in the Biological Survey Report (Appendix E). It includes extensive references to primary and secondary sources that have informed the background discussions provided below.

The biological study area (BSA) includes a 100-foot buffer around the approximately 165-acres project site and all off-site improvement areas.

3.3.2.1 Driving Range Remedial Work

In 2023, as part of the existing golf course's continued operations, soil extracted from another project was transported to the driving range location of the project site to create a berm to aid in golf ball retention. In total, approximately 1,000 cubic yards were moved to the existing driving range during a year-long period. A small bulldozer was used to spread the soil on the site's natural surface contours to create a berm along the outer edge of the driving range, adjacent to Sycamore Canyon Creek. No subsurface disturbance occurred as a result of the soil deposition.

Current activity at this location includes maintenance and ball catching activity. The driving range is vegetated with lawn grass; no native vegetation exists within the driving range. A 6–8-foot-tall chain link fence exists along the edge of the driving range, separating it from the vegetation adjacent to Sycamore Canyon Creek.

On August 19, 2024, the City of Santee issued a Notice of Violation to the landowner of the project site. The Notice of Violation identified the transportation of the dirt to the driving range without the required permit as a violation of the City of Santee's Municipal Code. The applicant was directed to remove the transported dirt from the driving range and restore the area to pre-construction conditions to the satisfaction of the City Engineer. The appropriate regulatory agencies were also informed of the potential violation and they requested that any restoration be completed prior to the raptor season of 2025.

By the end of 2024, the soil and berm were removed, and the soil was transported off site. The driving range at the project site was returned to its existing topographic contours prior to the soil deposition. The remediation work involved removing the soil and berm from the driving range to restore the site to its original condition. The 1,000 cubic yards of soil was transported off site to a residential construction site located just north of Robertson Street and west of Day Street in the unincorporated town of Ramona approximately 25 miles away. Equipment used for this effort involved a 966 loader, a D6 dozer, and a water equipment truck for dust control.

Although the transportation of the dirt to the driving range and the related remedial measures that were taken are not components of the currently proposed project, the City of Santee has requested that the EIR include information regarding any biological issues that may have resulted from the creation of the berm and the later removal of the soil, which is more particularly described in the *Memorandum for the Carlton Oaks Country Club and Resort – Driving Range Berm* (Appendix N in Appendix E, Biological Survey Report).

Construction of the berm with a small dozer did not affect sensitive vegetation communities, did not appear to result in sedimentation into the riparian area, and is very unlikely to have had significant noise effects on adjacent least Bell's vireo (*Vireo bellii pusillus*) during the nesting season. Nor were there any effects from the soil removal activities. Although no raptor nests are known within Carlton Oaks golf course or near to the driving range, the soil removal was completed prior to February 1, 2025, which is the beginning of the raptor nesting season, avoiding potential impacts on nesting raptors. These conclusions are discussed in the *Memorandum for the Carlton Oaks Country Club and Resort – Driving Range Berm* (Appendix M in Appendix E).

3.2.2.2 Physical Characteristics

Topography

The project site is located immediately north of SR-52 and immediately south of Carlton Oaks Drive. The topography of the project site is relatively flat as a majority is within the historical floodplain of the San Diego River.

Hydrology

The proposed project site lies within the Lower San Diego River Watershed (Hydrologic Unit Code [HUC] 10:1807030407) and contains the lower San Diego River and Forester Creek. These drainages are all characterized by vegetated streambeds and riparian habitats that run through urban areas. The southern boundary of the project site parallels the San Diego River (South Channel). Sycamore Canyon Creek enters the site in the northeast merges with the San Diego River (North Channel), then traverses the existing golf course, joining the San Diego River (South Channel) in the southwestern portion of the project site.

The drainages are surrounded by open space. Single-family residences are scattered throughout the area, whereas concentrated, low-density residential uses surround the project site. Developed areas along the San Diego River

are likely causing drainages to receive additional inputs via urban runoff. The lower San Diego River and Forester Creek are listed as impaired waterbodies under Section 303(d) of the Clean Water Act (CWA).

No vernal pools or similar ephemeral, seasonally inundated depressions were found to occur within the BSA.

Soils

No steep slopes or rock outcrops are present in the BSA. The Natural Resources Conservation Service (NRCS) has mapped the following soil series as occurring within the delineated jurisdictional waters based on the Soil Survey Geographic (SSURGO) database (USDA/NRCS 2006): Redding, Riverwash, Visalia, and Vista.

Soil series included within the SSURGO mapping unit (San Diego County Area; CA638) are described based on the official soil descriptions provided by the U.S. Department of Agriculture (USDA 2012). Detailed information regarding soils is provided in Appendix E.

3.3.2.3 Biological Resources

Literature and Database Review

In 2018 and 2019, searches of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB), the California Native Plant Society's (CNPS) Online Inventory of Rare and Endangered Plants, *San Diego Plant Atlas*, SanBIOS, U.S. Fish and Wildlife Service's (USFWS) Carlsbad Fish and Wildlife Office species occurrence data, and the National Wetlands Inventory (NWI) database were conducted to determine the potential for sensitive plant and wildlife species to occur within the vicinity of the project site.

Field Surveys

ICF biologists conducted field surveys in March through September 2019. Surveys were updated in April through July 2022. The Crotch's bumble bee (*Bombus crotchii*) surveys were conducted in August 2024. Table 3.3-1 provides a summary of all of the biological surveys and assessments conducted within the BSA. Vegetation mapping was conducted over the entire BSA. Survey areas for special-status species were restricted to suitable habitat for those species within the BSA. A full explanation of survey methods and results is discussed in Biological Study Report (Appendix E).

Focused surveys were conducted for the following:

- Rare plants, with a focus on San Diego ambrosia (*Ambrosia pumila*)
- Crotch's bumble bee
- Southwestern pond turtle (*Actinemys pallida*)
- Coastal California gnatcatcher (*Polioptila californica californica*)
- Least Bell's vireo
- Southwestern willow flycatcher (*Empidonax traillii extimus*)

The uplands within the BSA were assessed for suitability for Quino checkerspot butterfly (*Euphydryas editha quino*).

Table 3.3-1. Biological Survey Dates

Date	Survey Activity	Survey Personnel
3/14/2019	Quino checkerspot butterfly habitat assessment	James Hickman
4/6/2019	California gnatcatcher	James Hickman
4/16/2019	Least Bell's vireo	Ryan Layden
4/17/2019	Jurisdictional Delineation	Lanika Cervantes, Nicole Salas
4/19/2019	California gnatcatcher	James Hickman
4/24/2019	Vegetation mapping and rare plant survey	Kelsey Dix, Shawn Johnston
4/26/2019	California gnatcatcher	James Hickman
4/30/2019	Least Bell's vireo	Ryan Layden
5/3/2019	California gnatcatcher	James Hickman
5/17/2019	Least Bell's vireo	Ryan Layden
5/24/2019	California gnatcatcher	James Hickman
5/29/2019	Least Bell's vireo	Ryan Layden
5/29/2019	Southwestern willow flycatcher	Brian Lohstroh
6/10/2019	Least Bell's vireo	Ryan Layden
6/10/2019	Southwestern willow flycatcher	Brian Lohstroh
6/24/2019	Least Bell's vireo	Ryan Layden
6/24/2019	Southwestern willow flycatcher	Brian Lohstroh
6/24/2019	Rare plant survey	Kelsey Dix, Shawn Johnston
6/27/2019	California gnatcatcher	James Hickman
7/2/2019	Southwestern willow flycatcher	Brian Lohstroh
7/8/2019	Least Bell's vireo	Ryan Layden
7/8/2019	Southwestern willow flycatcher	Brian Lohstroh
7/22/2019	Least Bell's vireo	Ryan Layden
9/3/2019	Southwestern pond turtle	Will Kohn
9/4/2019	Southwestern pond turtle	Will Kohn
9/5/2019	Southwestern pond turtle	Will Kohn, Marcus Goncalves
9/6/2019	Southwestern pond turtle	Will Kohn
3/11/2020	Jurisdictional Delineation mapping refinement	Meris Guerrero
12/7/2021	Jurisdictional Delineation mapping refinement	Meris Guerrero
12/21/2022	Vegetation mapping	Shawn Johnston
4/28/2022	Rare plant survey	Shawn Johnston, Alix Fowler
5/9/2022	Least Bell's vireo	Ryan Layden
5/20/2022	California gnatcatcher, western pond turtle visual	Brian Lohstroh
5/23/2022	Least Bell's vireo	Ryan Layden
5/27/2022	California gnatcatcher, western pond turtle visual	Brian Lohstroh
6/3/2022	California gnatcatcher, western pond turtle visual	Brian Lohstroh
6/7/2022	Least Bell's vireo	Ryan Layden
6/8/2022	Rare plant survey	Shawn Johnston, Alix Fowler
6/14/2022	California gnatcatcher	Brian Lohstroh

Table 3.3-1. Biological Survey Dates

Date	Survey Activity	Survey Personnel
6/21/2022	Least Bell's vireo	Ryan Layden
6/21/2022	California gnatcatcher	Brian Lohstroh
6/29/2022	California gnatcatcher	Brian Lohstroh
6/29/2022	Mitigation site assessment	Alix Fowler, Dick Rol
7/8/2022	Least Bell's vireo	Ryan Layden
8/9/2024	Crotch's bumble bee habitat assessment, Crotch's bumble bee survey	Brian Lohstroh
8/16/2024	Crotch's bumble bee survey	Brian Lohstroh, Antonette Gutierrez
8/26/2024	Crotch's bumble bee survey	Brian Lohstroh, Antonette Gutierrez
8/30/2024	Crotch's bumble bee survey	Brian Lohstroh, Antonette Gutierrez

Vegetation Communities

Biological surveys were conducted throughout the BSA. Thirteen vegetation communities or landcover types were observed within the BSA. Table 3.3-2 provides the amount of each vegetation community present within the BSA, as illustrated on Figure 3.3-1. The majority of the BSA (80%) is made up of developed and disturbed habitats, with the remainder (20%) consisting of natural habitats. The vegetation communities observed were coastal and valley freshwater marsh, developed (including golf course), Diegan coastal sage scrub – disturbed, disturbed habitat, disturbed wetland, eucalyptus woodland, freshwater (jurisdictional ponds), mule fat scrub – disturbed, nonnative grassland, nonnative riparian, southern cottonwood–willow riparian forest (including disturbed), and southern riparian scrub.

Table 3.3-2. Existing Vegetation Within the Biological Study Area

Vegetation Community	Project Site		100-Foot Buffer	Total in BSA
	On Site	Off Site		
Natural Habitats				
Coastal and Valley Freshwater Marsh	0.68	0.00	0.00	0.68
Diegan Coastal Sage Scrub – disturbed	0.50	0.11	0.00	0.61
Disturbed Wetland	0.15	0.00	0.00	0.15
Fresh Water	5.31	0.00	0.00	5.31
Mule Fat Scrub – disturbed	0.52	0.00	0.35	0.87
Nonnative Grassland	0.09	0.00	0.02	0.11
Nonnative Riparian	0.31	0.00	0.00	0.31
Southern Cottonwood–Willow Riparian Forest	4.93	0.00	18.94	23.87
Southern Cottonwood–Willow Riparian Forest – disturbed	8.76	0.00	0.69	9.45
Southern Riparian Scrub	0.00	0.00	0.98	0.98

Table 3.3-2. Existing Vegetation Within the Biological Study Area

Vegetation Community	Project Site		100-Foot Buffer	Total in BSA
	On Site	Off Site		
<i>Natural Habitat Subtotals¹</i>	21.25	0.11	20.98	42.36
Developed and Other Landcover				
Developed	7.21	3.38	21.00	31.59
Developed – Golf Course	128.86	0.00	0.83	129.69
Disturbed Habitat	5.65	0.12	0.48	6.25
Eucalyptus Woodland	1.32	0.02	0.34	1.68
Nonnative Woodland	0.52	0.00	0.00	0.52
<i>Developed and Other Subtotals</i>	143.56	3.52	22.65	169.73
Project Totals¹	164.82	3.63	43.62	212.07

Note:

¹ Totals may not match sum of categories due to rounding.

The existing golf course, which is primarily considered “developed,” consists of managed ornamental plantings, including trees and fairways, which are dominated by exotic and ornamental grasses. Areas of jurisdictional wetlands were identified as their applicable vegetation community. The San Diego River (North Channel) runs through the golf course and has associated riparian habitat, including coastal and valley freshwater marsh, southern cottonwood–willow riparian forest, and disturbed wetland. Within the golf course are also non-jurisdictional artificial ponds that were identified as developed. A portion of the existing golf course was subject to the lease originally entered into between the golf course operator and the City of San Diego (as the lessor), dated January 30, 1959 (1959 Lease) for the operation, maintenance, repair, restoration, and replacement of a golf course. The 1959 Lease was terminated, and a subsequent lease was entered into by the parties, effective on January 12, 2012, for the same golf course purposes (2012 Lease). Within the project site, the City of San Diego Multi-Habitat Planning Area (MHPA) covers 12.86 acres of golf course and 0.33 acres of avoided riparian habitat that is located within the 2012 Lease area. The golf course was established in 1958, followed by the 1959 Lease for such purposes, and was subsequently renovated in 1989, long before the original MHPA boundary for the site was established as part of the City of San Diego Multiple Species Conservation Program (MSCP) mapping efforts, which became effective in March 1997. The City of San Diego also subsequently entered into the 2012 Lease that allowed for the continued use as a golf course.

Small amounts of other upland vegetation communities exist, primarily around the edges of the project site, including eucalyptus woodland, nonnative grassland, and Diegan coastal sage scrub – disturbed. Detailed information regarding vegetation communities is provided in Appendix E.

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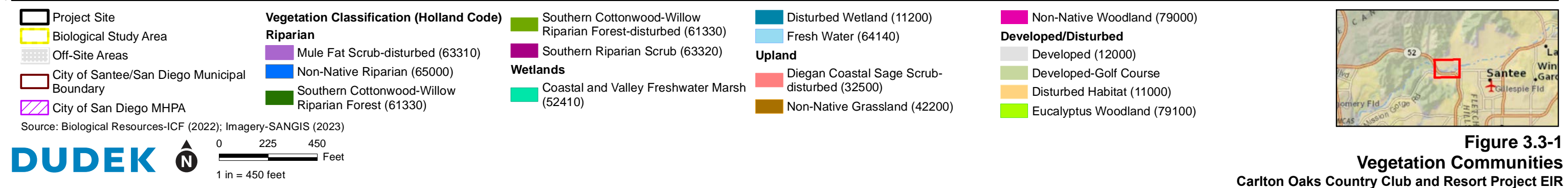
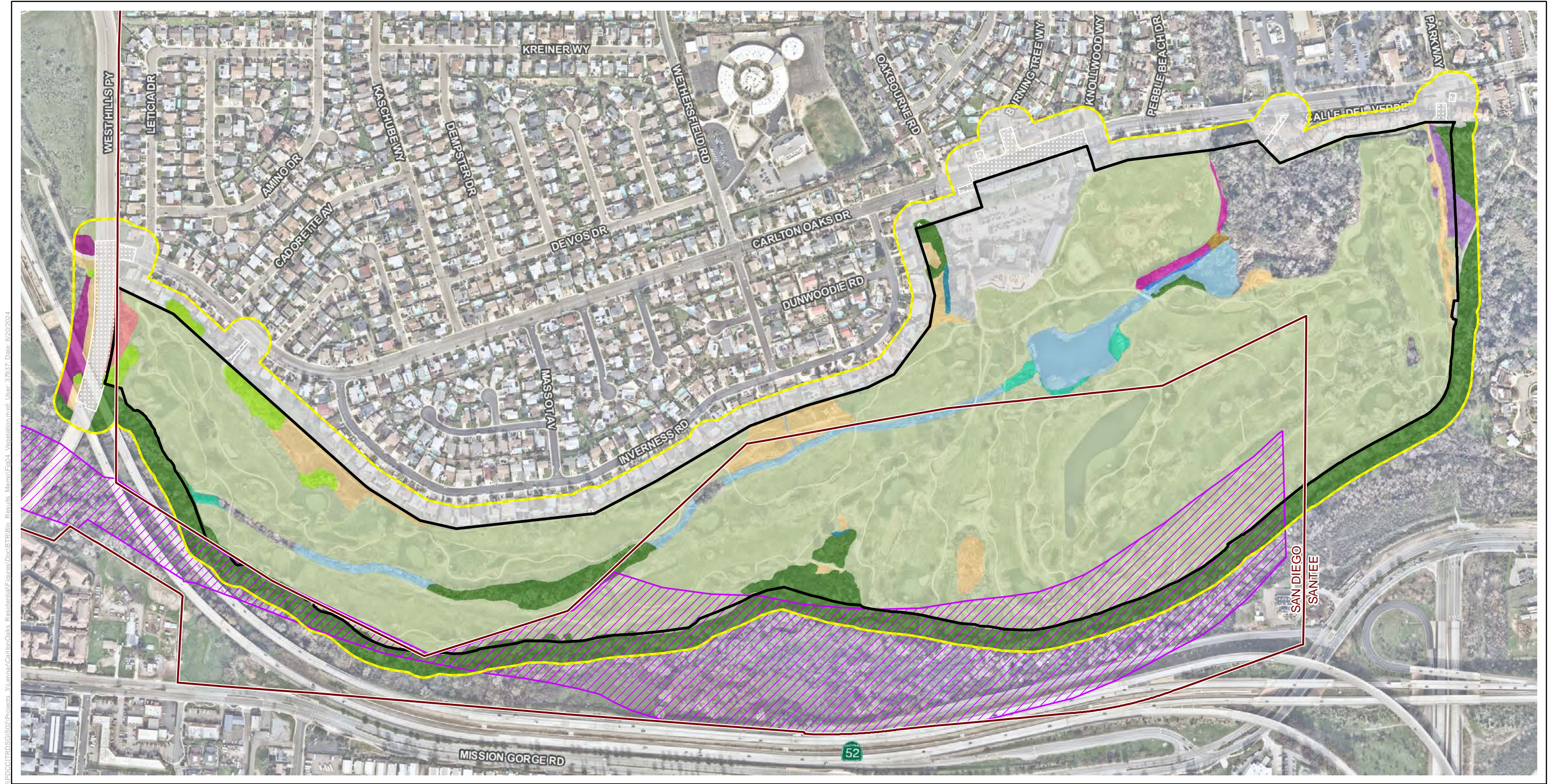


Figure 3.3-1
Vegetation Communities
Carlton Oaks Country Club and Resort Project EIR

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Special-Status Plant Species

ICF botanists Shawn Johnston and Kelsey Dix conducted focused surveys for special-status plant species within the BSA on April 24 and June 24, 2019 (see Table 3.3-1). The survey completed on June 24, 2019, included a focus on inspecting the BSA for San Diego ambrosia, a federally endangered plant known from the San Diego River floodplain.

Focused plant surveys were updated in 2022. Shawn Johnston conducted a reference site visit at a population of San Diego ambrosia during the week of May 16, 2022, observed the phenology of the known location of San Diego ambrosia, and determined that the species would be readily observable during early June 2022 if it were present within the BSA. ICF botanists Shawn Johnston and Alix Fowler conducted rare plant survey updates on April 28 and June 8, 2022.

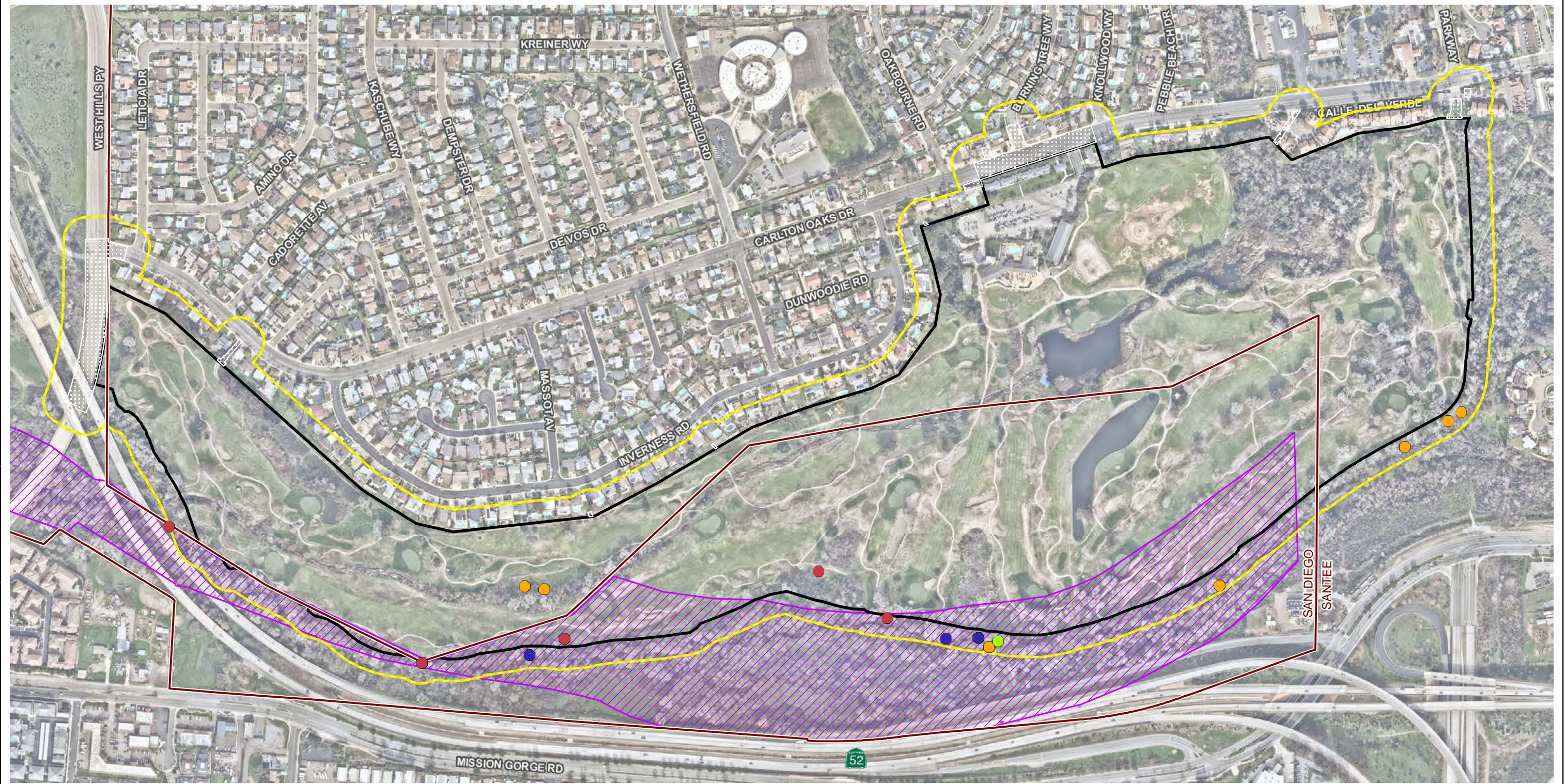
Surveys were conducted in accordance with survey protocols set forth by *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants* (USFWS 2000), *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018), and *CNPS Botanical Survey Guidelines* (CNPS 2001). Soil maps and vegetation maps were reviewed to identify areas with higher potential to support special-status plant species.

No MSCP covered plant species, nor California Endangered Species Act (CESA)- or Federal Endangered Species Act (FESA)-listed plant species, were observed within the BSA. Four special-status plant species with a California Rare Plant Rank (CRPR) were observed within the BSA within the City of San Diego: Palmer's sagewort (*Artemisia palmeri*), San Diego marsh-elder (*Iva hayesiana*), Southern California black walnut (*Juglans californica* var. *californica*), and southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*) (Figure 3.3-2, Sensitive Plant Species). Southwestern spiny rush was the only special-status plant species observed within the City of Santee.

Focused surveys were conducted for San Diego ambrosia in the BSA in 2019 and 2022, during dates when San Diego ambrosia would be most readily detectable, but none were observed. San Diego ambrosia is a narrow endemic in the City of San Diego's MSCP Subarea Plan (City of San Diego 1997). It typically occurs on terraces of creek beds, seasonally dry drainages, and floodplains outside of tree canopy. It is often associated with riverwash and sandy alluvium, such as those present in the BSA; however, the BSA has long existed as a developed golf course, which is generally unsuitable for this species. San Diego ambrosia is considered absent from the BSA because of negative results from focused surveys.

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- | | |
|-----------------------|---|
| Project Site | City of Santee/San Diego Municipal Boundary |
| Biological Study Area | City of San Diego MHPA |
| Off-Site Areas | |

- Sensitive Plant Species**
- | | |
|---|---|
| Palmer's sagewort (<i>Artemisia plamerii</i>) | Southern California black walnut (<i>Juglans californica</i>) |
| San Diego marsh-elder (<i>Iva hayesiana</i>) | Southwestern Spiny Rush (<i>Juncus acutus</i>) |

Source: Biological Resources-ICF (2022); Imagery-SANGIS (2023)

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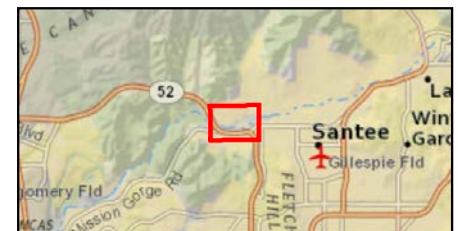


Figure 3.3-2
Sensitive Plant Species
Carlton Oaks Country Club and Resort Project EIR

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Special-Status Wildlife Species

In 2019, ICF biologists conducted protocol-level surveys for southwestern pond turtle, coastal California gnatcatcher, least Bell's vireo, southwestern willow flycatcher, and Crotch's bumblebee within suitable habitat for each of the species. No suitable breeding habitat for tricolored blackbird exists in the BSA. In addition, no suitable breeding or overwintering habitat was observed for monarch butterfly (*Danaus plexippus*) in the BSA.

In March 2019, ICF conducted a habitat assessment for Quino checkerspot butterfly and found no suitable habitat; therefore, the species was determined to be absent and no surveys were required. In 2022, ICF repeated protocol-level surveys for coastal California gnatcatcher and least Bell's vireo and conducted focused visual surveys for southwestern pond turtle. The 2022 survey update for least Bell's vireo included suitable habitat previously surveyed in 2019, excluding the San Diego River south of the golf course. The San Diego River was excluded from the survey because CNDDDB data (CDFW 2022) and the 2019 survey results show the San Diego River (South Channel) to be consistently occupied by least Bell's vireo; therefore, the San Diego River is considered occupied habitat. The proposed Carlton Oaks Country Club and Resort Project (project) does not propose any direct impacts within the San Diego River (South Channel). ICF conducted four focused surveys for Crotch's bumble bee in potentially suitable habitat within the BSA in August 2024.

Survey results determined that southwestern pond turtle, coastal California gnatcatcher, southwestern willow flycatcher, and Crotch's bumble bee were absent from the BSA. Context supporting the reasonableness of the results follows:

- Ponds within the survey area have intermittent hydrology (i.e., they dry out during some summers). Although pond turtles require permanent waters, visual and trapping surveys were conducted, with negative results.
- Coastal California gnatcatcher is a widespread and frequent resident in suitable coastal sage scrub habitat to the west in Mission Trails. Very little potential habitat for coastal California gnatcatcher is present within the study area, which consists primarily of roadside broom-baccharis establishing on dirt slopes. Protocol-level surveys did not detect the species.
- Potentially suitable habitat for southwestern willow flycatcher is present along the southern edge of the study area (outside of the project site), but this species was not detected during protocol surveys conducted in 2019. Because no habitat for this species will be affected, surveys were not required to be updated. This species has not been reported to breed in the San Diego River in recent years, so the negative results are not anomalous.
- Crotch's bumble bee is nearly endemic to California, and its range includes most of the state. The species has been documented in the City of Santee. Patches of potentially suitable habitat were observed around the golf course. Very few other species of bumble bee were observed, suggesting that habitat suitability for any bumble bee, including Crotch's bumble bee, is very low.

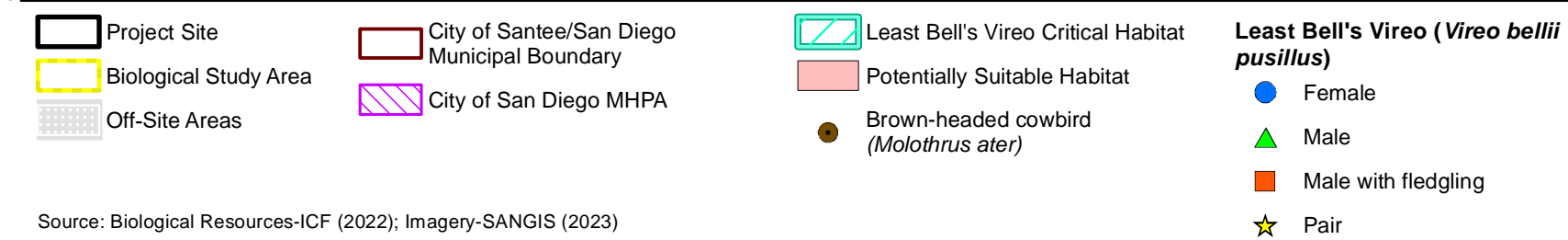
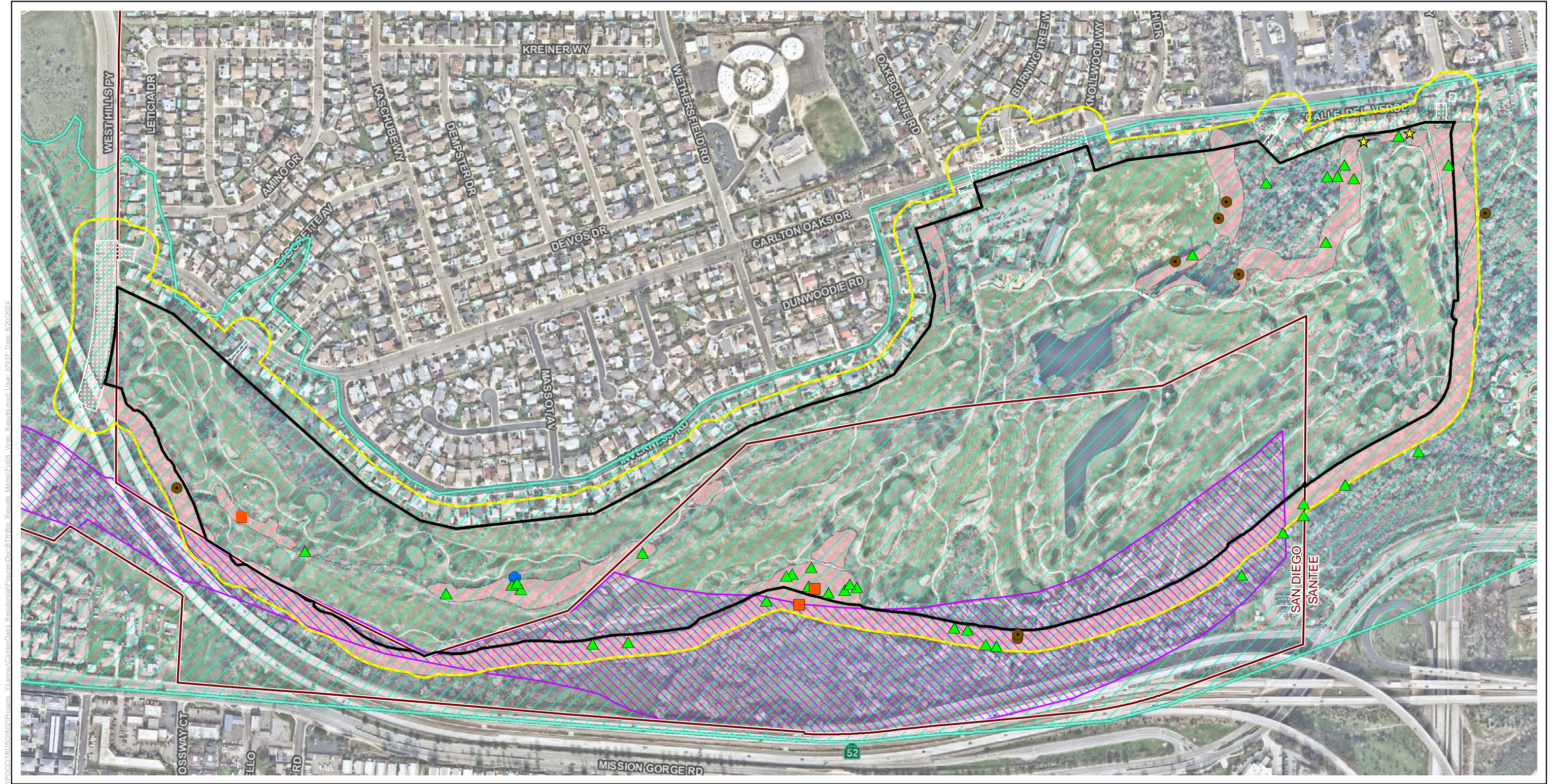
Focused surveys in 2019 and 2022 revealed multiple breeding pairs of least Bell's vireo to be present throughout the BSA (Figure 3.3-3, Least Bell's Vireo Distribution). No least Bell's vireo were observed utilizing golf course ponds or the riparian vegetation behind the existing Carlton Oaks Country Club. Other FESA species were not expected or were determined to have low potential to occur based on biological determination, including factors such as of lack of suitable habitat or being located outside of the species' range. Analysis of *not-expected* and *low potential to occur species* are described in *Appendix E, Sensitive Animal Species Potential to Occur* in the Biological Study Report (Appendix E).

Five non-listed special-status and/or MSCP covered species birds were incidentally detected during focused surveys or other biological surveys within the BSA: Cooper's hawk (*Accipiter cooperi*), vermilion flycatcher (*Pyrocephalus obscurus flammeus*), western bluebird (*Sialia mexicana*), yellow warbler (*Setophaga petechia*), and yellow-breasted chat (*Icteria virens*) (Figure 3.3-4, Other Sensitive Species). MSCP-covered southern mule deer (*Odocoileus hemionus*), was also observed. Double-crested cormorant (*Phalacrocorax auritus*) is not a special status or MSCP-covered species, but the on-site rookery is a CDFW-protected wildlife nursery site and is therefore discussed in the Wildlife Nursery Sites section.

Monarch butterfly was incidentally observed foraging on site during surveys for crotch's bumble bee in August 2024. Monarch is proposed threatened under the federal ESA. This species breeds exclusively on milkweeds (*Asclepias* spp.) and in California, may overwinter in protected groves of large trees generally within 1 mile of the Pacific coast. The proposed project site does not contain milkweed for reproduction, and does not contain suitable overwintering habitat, as the site is in an inland valley subject to occasional winter frosts. No proposed critical habitat for this species is present on the proposed project site or anywhere in San Diego County (89 FR 100662). Very limited nectar forage plants for this species are found within the golf course.

In addition, one special-status avian species and two special-status reptile species were determined to have high potential to occur (therefore, treated as if they were observed in suitable habitat) within the BSA, but were not detected incidentally during other biological surveys. These include Belding's orange-throated whiptail (*Aspidoscelis hyperythra hyperythra*), two-striped garter snake (*Thamnophis hammondi*), and white-tailed kite (*Elanus leucurus*). These represent locally common species that occur in limited ranges or species that have been affected by development. Although focused surveys were not conducted to determine the presence/absence of these species, there is a reasonable assumption that these species would periodically to frequently utilize the habitats within the BSA due to the suitability of the habitat and the local distribution of these species. Additional details regarding survey methods and results are provided in the Biological Study Report (Appendix E).

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Source: Biological Resources-ICF (2022); Imagery-SANGIS (2023)

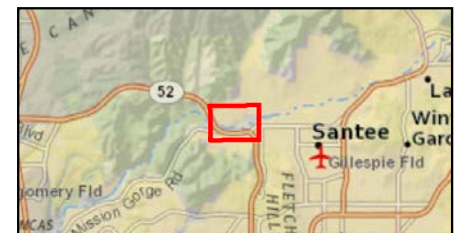
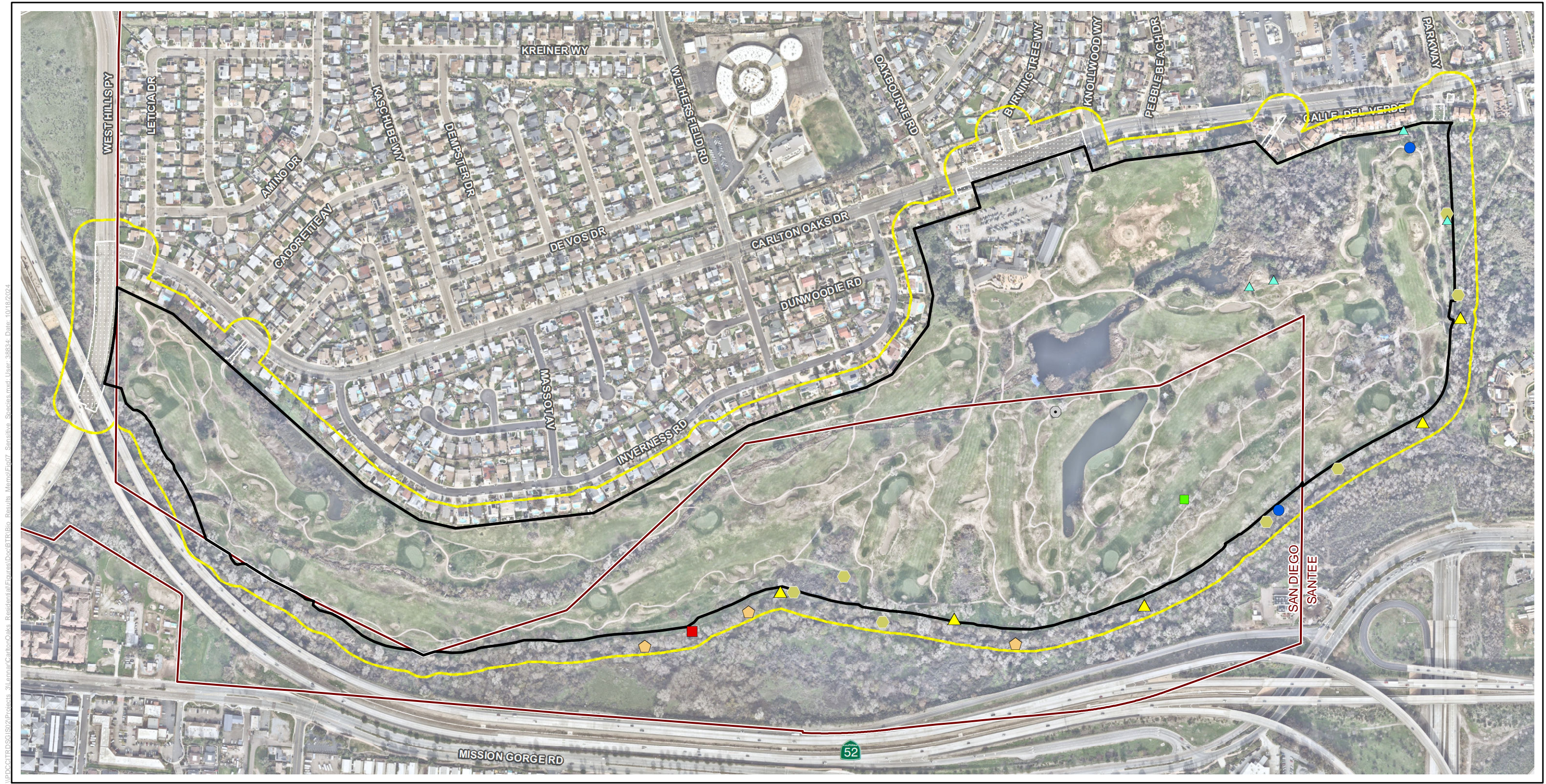


Figure 3.3-3
Least Bell's Vireo Distribution
Carlton Oaks Country Club and Resort Project EIR

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|--|--|--|
| <div><div></div> Project Site</div> <div><div></div> Biological Study Area</div> <div><div></div> Off-Site Areas</div> <div><div></div> City of Santee/San Diego</div> <div><div></div> Municipal Boundary</div> | Other Sensitive Species* <div><div></div> Cooper's hawk</div> <div><div></div> Double-crowned cormorant rookery</div> | <div><div></div> Southern mule deer</div> <div><div></div> Western bluebird</div> <div><div></div> Yellow warbler</div> <div><div></div> Yellow-breasted chat</div> <div><div></div> Monarch Butterfly</div> <div><div></div> Vermilion Flycatcher</div> |
|--|--|--|

Source: Biological Resources-ICF (2022); Imagery-SANGIS (2023)

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1 in = 450 feet

*Least Bell's Vireo Observations are on Figure 6.

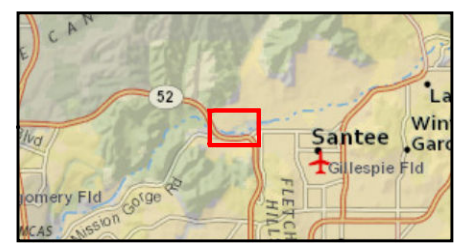


Figure 3.3-4
Other Sensitive Species
Carlton Oaks Country Club and Resort Project EIR

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3.3.2.4 Jurisdictional Waters and Wetlands

A jurisdictional delineation was conducted for this project in 2019 and is included as an appendix of the Biological Survey Report (Appendix E). Methods and results of the jurisdictional delineation are included here.

Prior to the field visit, aquatic resources were identified using high-resolution aerial imagery overlaid with geographic information system (GIS) data from the NWI and national hydrography dataset (NHD) (USFWS 2019; USGS 2023). These were used to identify the locations of potential areas of U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW jurisdiction within the BSA). In addition to the regionally available data (e.g., NWI and NHD), the approximate location and extent of aquatic resources were identified based on observed vegetation types, topographic changes, and visible drainage patterns. The proposed project is located within the 100-year floodway and floodplain of the San Diego River.

On April 17, 2019, ICF delineators Lanika Cervantes and Nicole Salas conducted the jurisdictional field delineation within the project site; a survey buffer was not included in the field jurisdictional delineation. The large, internal area along Sycamore Canyon Creek and the San Diego River (North Channel) in the northeastern portion of the project site was not delineated because these areas would be avoided by the proposed project (avoidance area). Areas of the San Diego River (North Channel) within the project site, outside of that large avoidance area, were delineated in 2019.

Survey results detected 10 features, including two excluded golf course ponds and one concrete V-ditch, within the delineation area, which were identified, evaluated, and mapped for potential USACE, RWQCB, and CDFW jurisdiction pursuant to the regulations described in Section 3.3.3, Applicable Laws and Regulations. Each feature evaluated within the proposed project site is depicted on Figure 3.3-5, Jurisdictional Waters and Wetlands, described below, and summarized in Table 3.3-3 and Table 3.3-4.

Table 3.3-3. Summary of U.S. Army Corps of Engineers and Regional Water Quality Control Board Aquatic Resources Within the Project Site (Including Avoidance Areas)

Feature	Linear Feet	OHWM Width ¹	USACE/RWQCB ²		
			Non-Wetland ³ (Acres)	Wetland ⁴ (Acres)	Excluded Waters ⁵ (Acres)
Aquatic Resource					
NWW ¹	7,218	54	7.486	—	—
NWW ²	416	24	0.24	—	—
NWW ³	139	3	0.01	—	—
NWW ⁴	76	—	—	—	—
NWW ⁵	163	20	0.09	—	—
WW ¹	—	—	—	0.05	—
WW ²	—	—	—	0.20	—
Non-Jurisdictional Feature					
EW ¹	—	—	—	—	1.77
EW ²	—	—	—	—	1.06
EW ³	253	—	—	—	0.01

Table 3.3-3. Summary of U.S. Army Corps of Engineers and Regional Water Quality Control Board Aquatic Resources Within the Project Site (Including Avoidance Areas)

Feature	Linear Feet	OHWM Width ¹	USACE/RWQCB ²		
			Non-Wetland ³ (Acres)	Wetland ⁴ (Acres)	Excluded Waters ⁵ (Acres)
<i>Subtotal</i>	8,265	—	7.82	0.25	2.84
Total	8,265	-	8.07		2.84

Notes: OHWM = ordinary high-water mark; USACE = U.S. Army Corps of Engineers; RWQCB = Regional Water Quality Control Board.

¹ Based on average OHWM width in the delineation area.

² USACE/RWQCB jurisdiction was not delineated in the large, interior avoidance area on the northeastern side of the project site.

³ Total acreage may not add up to the total shown; total is reflective of rounding GIS raw data in each category.

⁴ Acreage does not include wetlands within the stream channel (i.e., wetlands below the OHWM).

⁵ 33 Code of Federal Regulations 328.3(b)(4)(i) – artificially constructed lakes and ponds created in dry land are **not** considered waters of the United States.

⁶ Of this, 0.02 acres is concrete/riprap-lined.

Table 3.3-4. Summary of California Department of Fish and Wildlife Jurisdictional Resources Within the Project Site (Including Avoidance Areas)

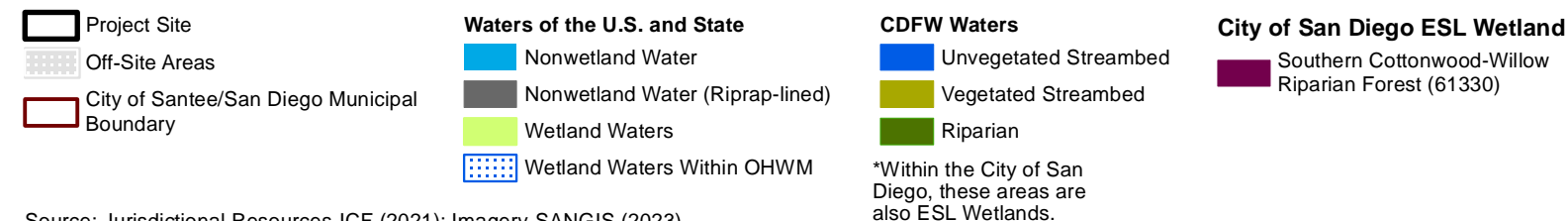
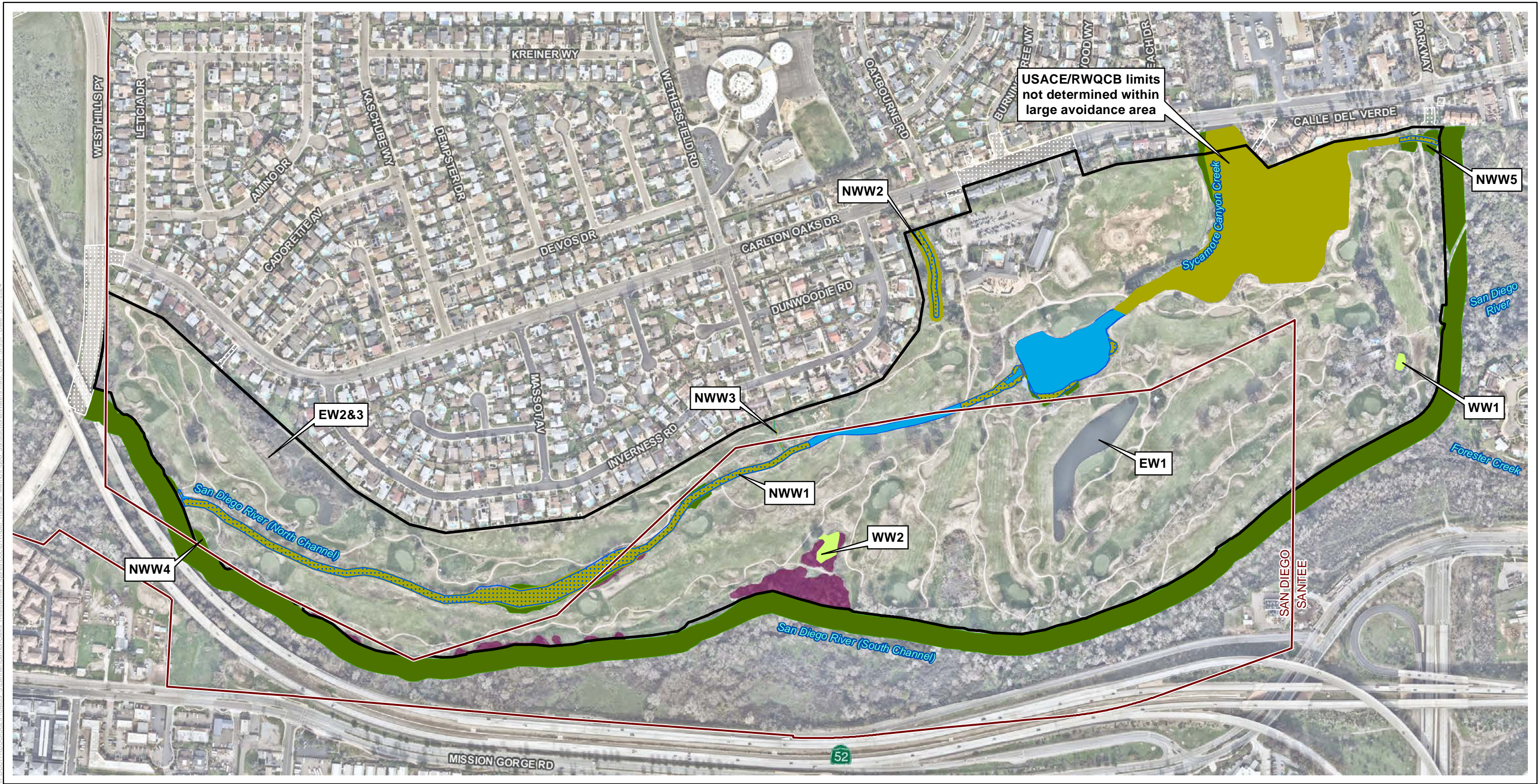
Aquatic Resource	Linear Feet	Top of Bank Width ¹ (Feet)	CDFW		
			Unvegetated Streambed (Acres)	Vegetated Streambed (Acres)	Riparian (Acres)
NWW ¹	7,218	65	2.970	13.708	0.476
NWW ²	416	60	—	0.606	—
NWW ³	139	6	—	0.019	—
NWW ⁴	76	—	—	—	0.059
NWW ⁵	163	30	—	0.122	0.214
<i>Subtotal</i> ²	8,012	—	2.970	14.455	0.749
Total	8,012	—	18.175		

Notes: CDFW = California Department of Fish and Wildlife.

¹ Based on average width in the proposed project site.

² Total acreage may not add up to the total shown; total is reflective of rounding GIS data in each category.

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Source: Jurisdictional Resources-ICF (2021); Imagery-SANGIS (2023)



Figure 3.3-5
Jurisdictional Waters and Wetlands
Carlton Oaks Country Club and Resort Project EIR

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Ten aquatic resources within the delineation area were identified and mapped for potential USACE, RWQCB, and CDFW jurisdiction. At least 8.07 acres of non-wetland and wetland aquatic resources likely subject to USACE and RWQCB regulatory jurisdiction (i.e., are waters of the state/United States) occur within the delineation area (i.e., the project site); the full extent of USACE/RWQCB jurisdiction was not determined within sections of NWW1 within Avoidance Areas in the northeastern side of the project site because these areas would not be affected by the project. Additionally, 18.175 acres (8,012 linear feet) of streambed and riparian resources would be subject to CDFW jurisdiction pursuant to Sections 1600–1616 of the California Fish and Game Code (CFGC).

Finally, three of the mapped aquatic resources—EW1, EW2, and EW3—are ornamental and/or artificial aquatic resources, constructed on dry land. These types of features are excluded aquatic resources (33 CFR 328.2(b)) and are not considered waters of the United States. The two managed golf course ponds and concrete V-ditch are artificial, ornamental waters created on dry land for primarily aesthetic reasons for the existing Carlton Oaks golf course. EW2 and EW3 receive urban runoff and stormwater runoff originating from the residential development north of the proposed Residential West area. The artificial V-ditch and western golf course pond are not an aquatic resource because the V-ditch and western pond are not “a relocated tributary, excavated in a tributary, or drain wetlands.” Additionally, EW1 (south of the proposed Residential North) is filled with non-potable water and is used to irrigate the golf course grounds.

Historical aerials confirmed the three features were constructed in dry land (Appendix J in Appendix E, Biological Survey Report). Prior to the construction of the golf course the San Diego River was leveed and rerouted to the south of the proposed project site in the 1960s. This converted the majority of the project site, including the areas inclusive of EW1, EW2, and EW3, to uplands (Attachment 1, Figure 1 in Appendix J of Appendix E), and the surrounding area began to develop with residential homes and the golf course. The excluded waters were constructed into golf course ponds and the concrete V-ditch in the 1980s, where the site had been upland habitat since the rerouting of the San Diego River.

Per the 2015 Clean Water Rule (33 CFR 328.3(b)(4)(ii)) artificial, constructed lakes and ponds created in dry land are excluded by rule. Both the golf course ponds (EW1 and EW2) meet this definition and are therefore, not considered waters of the United States. Likewise, and in accordance with 33 CFR 328.3(b)(3) the concrete V-ditch (EW3) is a ditch that carries ephemeral flows and is not a relocated tributary and was not constructed in a tributary. Thus, EW3 is not considered a water of the United States.

An approved jurisdictional determination from the USACE was obtained confirming that CWA jurisdiction does not exist over the excluded waters (i.e., EW1, EW2, and EW3) (see Appendix J in Appendix E).

City of San Diego ESL Wetlands

City of San Diego Environmentally Sensitive Lands (ESL) regulations have protections for wetlands. City of San Diego Municipal Code Chapter 11, Article 3, Division 1 includes the following wetland definition: “Wetlands are defined as areas which are characterized by any of the following: (1) All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to ... riparian forest ... riparian woodlands, riparian scrub....” Riparian habitat along the San Diego River (South Channel) within the City of San Diego limits meets this definition of City of San Diego ESL Wetlands. The riparian and wetland habitat along the San Diego River (North Channel) within the City of San Diego also meets the definition of ESL Wetlands (Feature NWW1, as discussed in Appendix E, Section 3.3.1).

The City of San Diego ESL regulations state “It is intended for this definition to differentiate for the purposes of delineating wetlands, between naturally occurring wetlands and wetlands intentionally created by human actions” with artificially created areas not considered wetlands under this definition. Excluded Waters 1, 2, and 3 are water bodies intentionally created by human actions in the creation of the golf course, as demonstrated in historic photos in Appendix J to Appendix E. Because these golf course ponds were intentionally created by human actions, they are not wetlands subject to City of San Diego ESL regulations.

The San Diego River (South Channel) and its associated riparian habitat exist beyond the southern boundary of the project site, which is separated from the golf course by a tall earthen berm. Willows and other riparian-associated vegetation exist north of the berm within the limits of the golf course in the south-central portion of the project site. These areas were mapped within the vegetation layer as southern cottonwood–willow riparian forest. These areas are separated from normal overflow of the San Diego River (South Channel) by the tall berm but may be inundated by flooding from Sycamore Canyon Creek or from extreme flow events of the San Diego River (North Channel). The cottonwoods and willows would be able to persist because of the elevated water table associated with the perennial San Diego River (South Channel). This riparian area is considered a City of San Diego ESL Wetland because of the presence of riparian vegetation communities, but it is not considered CDFW jurisdictional because of the presence of the berm and the associated lack of connection to wetland hydrology. This forest is within avoidance areas and will not be removed.

Sycamore Canyon Creek drains the nearly 10,000-acre watershed of Sycamore and West Sycamore Canyons in east Marine Corps Air Station Miramar, northern Santee, and the County of San Diego Sycamore Canyon/Goodan Ranch Preserve. To the north of the project site, Sycamore Canyon Creek parallels the Santee Lakes and enters the project site under the Carlton Oaks Drive Bridge. Sycamore Creek then merges with the San Diego River (North Channel) and encounters a historical impoundment within the existing golf course. The channel (now called the San Diego River [North Channel]) passes over a spillway and then traverses the existing golf course in a mildly incised earthen channel before meeting the mainstem San Diego River (South Channel) at the southwestern side of the project site. The impoundment along the San Diego River (North Channel) is an intermittent feature and dries out during some summers, as it did in 2021. The City of San Diego municipal boundary intersects with the San Diego River (North Channel) below the impoundment (Figure 3.3-5). The San Diego River (North Channel) travels 1,735 feet within the City of San Diego; all of the San Diego River (North Channel) within the City of San Diego would be considered a City of San Diego ESL Wetland based on the frequent occurrence of native and nonnative hydrophytic vegetation.

The riparian habitat to the north of the berm was observed to contain breeding least Bell’s vireo habitat in 2019. Least Bell’s vireo is widespread within this section of the San Diego River during the summer breeding season. This ESL Wetland is considered occupied least Bell’s vireo habitat. Least Bell’s vireo were observed along the San Diego River (North Channel) within the City of San Diego during protocol-level surveys conducted in 2022.

3.3.2.5 Habitat Connectivity and Wildlife Corridors

Wildlife Movement Corridors

Wildlife movement corridors are areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features, such as canyon drainages, ridgelines, or areas with vegetative cover, provide corridors for wildlife movement. Wildlife movement corridors are important because they provide access to mates, food, and water, allow the dispersal of individuals away from high population–density areas, and facilitate the exchange of genetic traits between populations.

The BSA is immediately north of and adjacent and parallel to an east–west running portion of the mainstem of the San Diego River (South Channel), being situated in the floodplain of the river (Figure 3.3-6, Adjacent Lands). Situated as it is in the river floodplain, the topography is generally flat throughout most of the BSA. Residential housing is found immediately south of the river and SR-52. Most of the San Diego River (South Channel) is within the boundaries of the MHPA. The BSA is bounded by residential housing to the north and Carlton Oaks Drive on the northeast. Situated north across Carlton Oaks Drive is the 190-acre Santee Lakes Recreation Preserve, which consists of several fish-stocked lakes, campgrounds, and semi-natural areas.

The *California Essential Habitat Connectivity Project* (Spencer et al. 2010) was commissioned to encourage a functional network of connected wildlands for the continued support of California’s diverse natural communities. The report identifies large, relatively natural habitat blocks that support native biodiversity (Natural Landscape Blocks) and areas essential for connectivity between Natural Landscape Blocks (Essential Connectivity Areas). For the South Coast Region, the report identifies an Essential Connectivity Area from Mission Trails/Santee to the northeast to Central Poway, and County of San Diego Sycamore Canyon/Goodan Ranch Preserve to the large blocks of habitat to the east of SR-67, including City of San Diego Cornerstone Lands at San Vicente Reservoir, CDFW San Vicente Highlands Open Space Preserve, County of San Diego Boulder Oaks Preserve, El Capitan Preserve, and Oak Oasis Preserve, and open space beyond these preserve lands. The BSA is not within this or other Essential Connectivity Areas.

The MSCP Plan includes designated Habitat Linkages, which served as analytical tools to assist in testing preserve design criteria (City of San Diego 1998). The MSCP Plan includes the area from Mission Trails through East Elliott to Sycamore Canyon/Goodan Ranch Preserve as a Habitat Linkage; it does not identify a formal biological linkage to the east along the San Diego River through the City of Santee (see Table 2.2 in City of San Diego 1998). The MSCP Plan does not identify wildlife corridors beyond those described in the MSCP Plan. The wildlife agency draft City of Santee Subarea Plan identifies a wildlife movement corridor along the San Diego River between Mission Trails, through Santee, east toward the community of Lakeside.

Although the *California Essential Habitat Connectivity Project* and the MSCP Plan do not include the San Diego River through Santee as a designated wildlife linkage, this analysis considers the San Diego River as a large and important linear habitat feature consisting primarily of various riparian, wetland, and open water habitat types, in addition to other habitat types, such as upland scrub. This river environment provides nesting and refugia habitat for a large number of native bird species, as well as nursery and refugia sites for many other species, including mammals, reptiles, amphibians, and invertebrates. It also provides the important function of allowing animals, seeds, and nutrients to move throughout the landscape ecosystem for dispersal or to allow for life-cycle completion. The San Diego River is heavily constrained by residential development to the north and south of the project site, by the City of Santee and El Cajon’s Fletcher Hills, respectively. To the east of the project site, the San Diego River is heavily constrained by transportation corridors and residential and commercial development in the City of Santee and the communities of Lakeside and Winter Gardens. To the west of the project site, the San Diego River opens into the large open space of Mission Trails Regional Park and the undeveloped East Elliott areas of Marine Corps Air Station Miramar.

The San Diego River (South Channel) contains expansive riparian forest and the main perennial channel of the San Diego River. The San Diego River (South Channel) borders the project site to the south. A berm exists along much of the southern boundary of the project site, which has a dirt trail on or along the base of the berm for most of that boundary. Golf course maintenance staff report seeing wildlife species consistently utilizing the dirt trail for movement at dusk, dawn, and night. This is not surprising, considering the ease of movement along an isolated dirt

path adjacent to the shelter of the riparian forest located south of the project site. The continuous riparian forest corridor of the San Diego River (South Channel) is considered to be the primary movement corridor.

The existing Carlton Oaks Golf Course is functionally a savanna, with expansive “lawns” of golf course features, with scattered ornamental trees throughout. The golf course provides for active recreation during the day, but is essentially unoccupied by humans at night, allowing for easy, additional wildlife movement through this savanna-like community. The golf course also includes the San Diego River (North Channel). The San Diego River (North Channel) has intermittent hydrology and lacks shrub and tree cover over much of its length; common vegetation in the channel includes invasive, herbaceous floating water-primrose (*Ludwigia peploides*), which does not provide function cover for mammal movement. The golf course and the San Diego River (North Channel) can serve as a secondary movement corridor for wildlife following the San Diego River (South Channel).

A few examples of wildlife species observed moving through or living in this wildlife corridor are southern mule deer, coyote (*Canis latrans*), desert cottontail (*Sylvilagus audubonii*), great blue heron (*Ardea herodias*), snowy egret (*Egretta thula*), red-tailed hawk (*Buteo jamaicensis*), Nuttall's woodpecker (*Dryobates nuttallii*), least Bell's vireo, western bluebird, and yellow-breasted chat.

Wildlife Core Areas

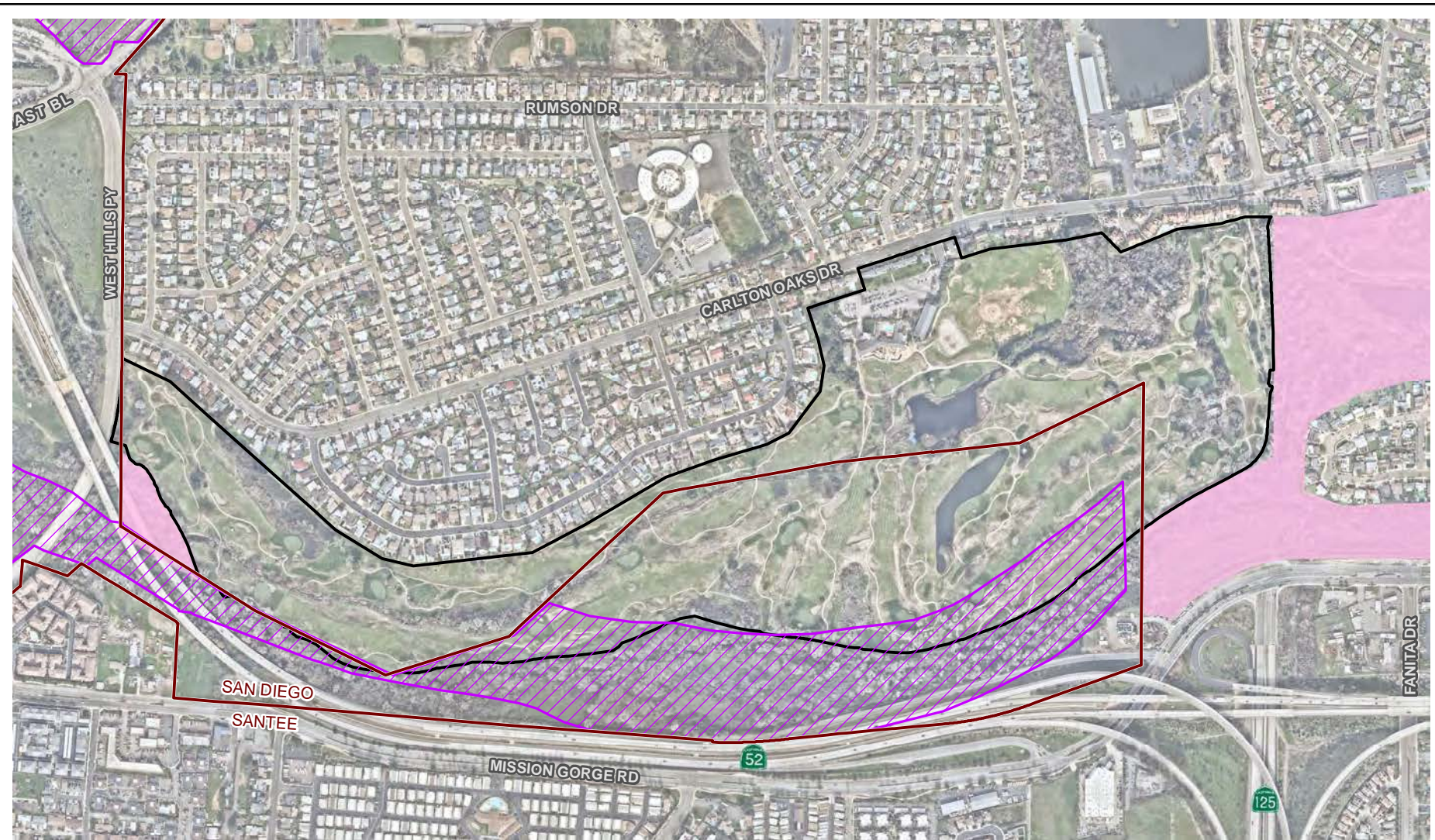
The MSCP (City of San Diego 1998) identifies the connection from Mission Trails northeast through East Elliott to San Vicente Cornerstone Lands as part of a generalized core biological area (Mission Trails/Kearney Mesa/East Elliott/Santee). The City of San Diego's MSCP Subarea Plan also identifies a part of the generalized core biological area extending from Mission Trails to the vicinity of the BSA. The City of San Diego's MSCP Subarea Plan (City of San Diego 1997) refined the generalized core biological area of the MSCP Plan into the specific MHPA, which is a “hard line” preserve, noting that not all of the generalized core biological area would be included in the hardline preserve. The San Diego River (south channel) includes portions of the existing golf course designated as MHPA. Biological resource core areas, such as the riparian corridor along the San Diego River (South Channel) to the south of the BSA, generally have high value.

Sycamore Canyon Creek to the north of Carlton Oaks Drive averages 200-feet wide, constrained by existing residential housing to the west and a 6-foot-tall chain-link fence separating the creek from Santee Lakes. Therefore, the BSA would provide constrained connectivity for species moving between the San Diego River environment and the Santee Lakes Recreation Preserve.

Double-crested cormorant occurs commonly as a nonbreeding visitor in both salt- and freshwater bodies in San Diego County. It is widespread and common as a winter visitor but is very rare as a breeding population. A rookery was observed in a eucalyptus along a pond within the San Diego River (North Channel) in the center of the golf course in the City of San Diego. The *San Diego County Bird Atlas* reported that only two rookery locations were known from San Diego County (Unitt 2004), with Carlton Oaks representing a new rookery. Rookeries of this species are considered special-status by CDFW and are wildlife nursery sites protected under the California Environmental Quality Act (CEQA).

The municipal boundaries of the Cities of San Diego and Santee are intertwined across the golf course and the San Diego River. The habitat connectivity analysis is a landscape-scale analysis and is the same for both jurisdictions.

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- Project Site
- City of Santee/San Diego Municipal Boundary
- City of San Diego MHPA
- Existing Protected Open Space or Conservation Lands

Source: Imagery-SANGIS (2023)

DUDEK



0 400 800
1 in = 800 ft Feet



Figure 3.3-6
Adjacent Lands
Carlton Oaks Country Club and Resort Project EIR

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3.3.2.6 San Diego MSCP

Portions of the project site within the City of San Diego are covered by the City of San Diego's MSCP Subarea Plan. The portion of the project site within the City of Santee is not a part of the Santee Subarea Plan and is therefore not discussed here.

City of San Diego MHPA

The City of San Diego MHPA is present along and within the southern boundary of the BSA. Of the 13.19 acres within the MHPA, 12.86 acres of golf course and associated recreational use that existed prior to adoption of the City of San Diego's MSCP Subarea Plan and MHPA (and is subject to the 2012 Lease for such purposes) would be redesigned, and 0.33 acres of southern cottonwood–willow riparian forest would be avoided.

City of San Diego MSCP Subarea Plan Species

The City of San Diego's MSCP Subarea Plan covered animal species observed within the BSA were least Bell's vireo, Cooper's hawk, mule deer, and western bluebird. Belding's orange-throated whiptail is MSCP-covered, was determined to have a high potential to occur, and is therefore treated as if it were observed. No other MSCP-covered plant or animal species were observed or determined to have a high potential to occur.

Least Bell's vireo is the only one of these MSCP species which has specific conditions of coverage under the City of San Diego's MSCP Subarea Plan (City of San Diego 1997). The conditions of coverage in the City of San Diego's MSCP Subarea Plan are as follows:

Jurisdictions will require surveys (using appropriate protocols) during the CEQA review process in suitable habitat proposed to be affected and incorporate mitigation measures consistent with the 404(b)1 guidelines into the project. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. Jurisdictions must require new developments adjacent to preserve areas that create conditions attractive to brown-headed cowbirds to monitor and control cowbirds. Area specific management directives must include measures to provide appropriate successional habitat, upland buffers for all known populations, cowbird control, and specific measures to protect against detrimental edge effects to this species. Any clearing of occupied habitat must occur between September 15 and March 15 (i.e., outside of the nesting period).

The project complies with the conditions of coverage listed above, as discussed below. During the CEQA review process, surveys were conducted using appropriate protocols. Mitigation measures were designed consistent with the 404(b)1 guidelines. Brown-headed cowbirds (*Molothrus ater*) are a nest parasite for songbirds, including least Bell's vireo. Brown-headed cowbirds prefer habitats with scattered trees among grassland vegetation–woodland edges, including prairies, fields, pastures, and orchards, and is often associated with cows and agriculture (Unitt 2004; Lowther 2020). Brown-headed cowbirds are widespread in San Diego County (Unitt 2004) and were observed during least Bell's vireo surveys in 2019 and 2022 (see Appendix E). The proposed project would not create new development adjacent to preserve areas that are more attractive to brown-headed cowbirds than the existing golf course conditions. No other specific Area-Specific Management Directives are applicable to the proposed project. No clearing of occupied habitat would occur within the City of San Diego or the MHPA.

3.3.3 Applicable Laws and Regulations

3.3.3.1 Federal

Federal Endangered Species Act

FESA was enacted in 1973 to provide protection to threatened and endangered species and their associated ecosystems. Species listed as endangered or threatened by the USFWS are protected under FESA Section 9, which forbids any person to take an endangered or threatened species. *Take* is defined in FESA Section 3 as to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” The U.S. Supreme Court ruled in 1995 that the term *harm* includes destruction or modification of habitat. FESA Sections 7 and 10 may authorize *incidental take* for an otherwise lawful activity (e.g., a development project), if it is determined that the activity would not jeopardize survival or recovery of the species. FESA Section 7 applies to projects where a federally listed species is present, and there is a federal nexus, such as where a federal CWA Section 404 permit (e.g., impacts on waters of the United States) is required. FESA Section 10 applies when a federally listed species is present, but no federal nexus is present.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) was enacted in 1918 to prohibit the killing or transport of native migratory birds, or any part, nest, or egg of any such bird, unless allowed by another regulation adopted in accordance with the MBTA. A list of migratory bird species that are protected by the MBTA is maintained by USFWS, which regulates most aspects of the taking, possession, transportation, sale, purchase, barter, exportation, and importation of migratory birds. Under the MBTA, *take* means to “kill, directly harm, or destroy individuals, eggs, or nests or to otherwise cause failure of an ongoing nesting effort.” Permits are available under the MBTA through USFWS, and authorization for potential take under the MBTA is addressed as part of the FESA Section 7 consultation process. The proposed project must be analyzed to ensure consistency with the MBTA, including avoidance of take of nesting birds, their eggs, or activities that may cause nest failure. Any potential take must be either permitted through consultation with USFWS or avoided and minimized through mitigation measures.

Bald and Golden Eagle Protection Act

When first enacted in 1940, the Bald and Golden Eagle Protection Act prohibited the take, transport, or sale of bald eagles (*Haliaeetus leucocephalus*), their eggs, or any part of the eagle. The act was amended in 1962 to extend prohibitions to the golden eagle (*Aquila chrysaetos*). *Take* is defined by the act as being to “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest, or disturb.”

Clean Water Act

In 1948, Congress first passed the Federal Water Pollution Control Act. This act was amended in 1972 and became known as the CWA. The CWA regulates the discharge of pollutants into waters of the United States.

Under CWA Section 404, permits need to be obtained from the USACE for discharge of dredge or fill material into waters of the United States. The USACE issues two types of CWA 404 permits: Individual and General; there are two types of General Permits: Regional and Nationwide. Regional permits are issued for a general category of activities when they are similar in nature and cause minimal environmental effect. Nationwide permits are issued to allow a variety of minor project activities with no more than minimal effects.

Under CWA Section 401, water quality certification from the RWQCB must be obtained if impacts would occur on waters of the United States. This certification is most frequently required in tandem with a CWA Section 404 permit request.

3.3.3.2 State

California Environmental Quality Act

CEQA requires that biological resources be considered when assessing the environmental impacts resulting from proposed actions. CEQA does not specifically define what constitutes an “adverse effect” on a biological resource. Instead, lead agencies are charged with determining what specifically should be considered an impact. CEQA provides a checklist regarding what types of biological resources should be considered in this process.

California Fish and Game Code

The CFGC contains a variety of environmental regulations including prohibitions against taking sensitive plants and wildlife, descriptions of the Lake and Streambed Alteration Program, and CESA. The CFGC regulates the taking or possession of birds, mammals, fish, amphibians, and reptiles. It also provides additional protections for endangered species and regulations to protect lakes and streams and associated fish and wildlife habitat. Provisions regarding the protections for nesting birds are described in CFGC Section 3500 et seq. and make it unlawful to take, possess, or needlessly destroy the nest or eggs of most wild birds.

Lake and Streambed Alteration Program

The Lake and Streambed Alteration Program is administered by the California Department of Fish and Wildlife (CDFW) and is found in Section 1600 et seq. of the CFGC. The regulations define that an entity shall not 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 must be notified if a project would affect lake or streambed resources.

California Endangered Species Act

CESA prohibits the “take” of any species that the California Fish and Game Commission determines to be a threatened or endangered species. CESA is found in CFGC Sections 2050–2116. CESA is administered by CDFW, and incidental take of listed species can be approved by the CDFW. *Take* is defined by CESA as to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill. Notably, this differs from the FESA definition.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) was enacted in 1977 and allows the California Fish and Game Commission to designate plants as “rare” or “endangered.” There are 64 species of plants designated and protected as rare under the NPPA. Species designated as endangered are regulated under the provisions of CESA. The NPPA prohibits take of endangered or rare native plants, but it includes some exceptions for agricultural and nursery operations, emergencies, and—after properly notifying CDFW—certain types of vegetation removal. It is primarily codified in CFGC Section 1900 et seq.

Porter–Cologne Water Quality Control Act

The Porter–Cologne Water Quality Control Act is the California equivalent of the CWA. It provides for statewide coordination of water quality regulations through the establishment of the California State Water Resources Control Board and nine separate RWQCBs that oversee water quality on a day-to-day basis at the regional/local level.

Natural Community Conservation Planning Act of 1991

The Natural Community Conservation Planning (NCCP) Act is designed to conserve natural communities at the ecosystem scale, while accommodating compatible land use. The CDFW is the principal state agency implementing the NCCP Program. NCCP plans developed in accordance with this act provide for comprehensive management and conservation of multiple wildlife species and identify and provide for the regional or areawide protection and perpetuation of natural wildlife diversity, while allowing compatible and appropriate development and growth. The San Diego MSCP is an NCCP and is discussed in Section 3.3.3.3, Local.

California Coastal Act

The California Coastal Act of 1976 established the California Coastal Commission, which regulates the use of land and water in the coastal zone. The coastal zone extends up to 5 miles inland from the coast. The BSA is outside of the coastal zone and is therefore not subject to the jurisdiction of the California Coastal Commission.

3.3.3.3 Local

San Diego Multiple Species Conservation Program

The San Diego MSCP is a long-term regional conservation plan designed to establish a connected preserve system that protects the sensitive species and habitats within its boundaries. The MSCP covers 582,243 acres over 12 jurisdictions. The Final MSCP Subregional Plan was approved in August 1998 (MSCP Plan; City of San Diego 1998). The combination of the MSCP Plan and the local jurisdiction's subarea plans serve as a multiple species Habitat Conservation Plan (HCP) pursuant to Section 10(a)(1)(B) of the FESA and a NCCP pursuant to the California NCCP Act of 1991 and CESA. The participating jurisdictions and special districts are submitting plans to the USFWS and CDFW in support of applications of permits and management authorizations to impact listed species and other species of concern. The conservation and management responsibilities, guarantees of implementation, and corresponding authorizations for all parties are contained in Implementing Agreements between the local jurisdictions and the Wildlife Agencies (i.e., USFWS and CDFW).

Local jurisdictions implement their respective portions of the San Diego MSCP Plan through subarea plans, which describe specific implementing mechanisms for the City of San Diego's MSCP Subarea Plan. The City of San Diego has an approved subarea plan under the MSCP (City of San Diego 1997). The City of Santee is in the process of preparing a subarea plan and provided a draft to the Wildlife Agencies (i.e., USFWS and CDFW) in 2018 (City of Santee 2018).

City of Santee

General Plan

The Conservation Element of the City of Santee's *General Plan* contains policies related to protection and preservation of sensitive biological resources (City of Santee 2003). The following objectives and policies are relevant to the proposed project:

Objective 1.0: Protect areas of unique topography or environmental significance to the greatest extent possible.

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 2.3: The City should participate in regional planning efforts aimed at habitat protection and recreational enjoyment of the San Diego River.

Policy 2.4: The City should promote the design and use of floodways and adjacent land for recreation whenever appropriate as part of flood control and habitat improvements.

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.

Objective 7.0: Preserve significant biological resources.

Policy 7.1: The City shall encourage the preservation and enhancement of significant biological resources in areas designated as permanent open space.

Policy 7.2: The City shall require that all development proposals provide appropriate mitigation for identified significant biological resources including selective preservation, sensitive site planning techniques and in-kind mitigation for identified impacts.

Policy 7.3: The City shall require that, for all development proposals involving the setting aside of land for permanent open space either on-site or off-site, provisions are in place to ensure the long term management of the open space and biological resources.

Policy 7.4: The City shall complete a Multiple Species Conservation Program Subarea plan that conserves a minimum of 2,600 acres in the City as permanent open space for preservation of habitats and species.

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 10.1: The City should encourage the conservation of rare or unique plants and wildlife by identifying such resources through the environmental review process and by using open space preservation, where appropriate, to preserve the resources as a condition of a project approval, consistent with the City's future Multiple Species Conservation Program Subarea Plan.

Municipal Code

The City of Santee Municipal Code includes the following provisions that are relevant to the proposed project:

Title 8 – Streets, Sidewalks and Public Property

Chapter 8.06 – Urban Forestry establishes a reasonable amount of tree cover on public and private lands in the City resulting in trees that contribute to a quality environment. Specific standards for planting, maintenance, and removal are outlined under this chapter.

Title 11 – Buildings and Construction

Chapter 11.38 – Drainage and Watercourses establishes that no obstruction or interference with watercourses or floodways unless a permit is obtained prior to such fill or alteration.

MSCP Subarea Plan (Draft)

The City of Santee's *General Plan* (City of Santee 2003) requires that all development proposals that could affect biological resources be consistent with the provisions of the City's future MSCP Subarea Plan and Implementing Agreement, and applicable federal and state regulations. Although the *Wildlife Agency Review Draft Santee MSCP Subarea Plan* (Draft Santee MSCP Subarea Plan) (City of Santee 2018) has not yet been approved, it is used as the guidance document for projects occurring within the City of Santee.

The proposed project has been identified as Not a Part (NAP) of the Subarea Plan Area. The take authorization under the Subarea Plan is not available for projects occurring in the NAP areas. The applicant would seek take authorization through FESA Section 7 or an individual FESA Section 10 permit. The applicant would process all required permits and adhere to all relevant regulatory requirements. Impacts on listed species would utilize standard federal and state incidental take permit processes, as applicable.

Preserve Adjacency Guidelines

The Draft Santee MSCP Subarea Plan includes guidelines to reduce potential for impacts from development on adjacent preserves. Because the proposed project is adjacent to City-owned Preserve Lands (Mast Park West), the City of Santee will ensure that new developments adjacent to the boundaries of the Subarea Plan Managed Preserve adhere to the following adjacency guidelines:

- **Drainage:** All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, excess water, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the preserves. This may be accomplished using a variety of methods, including natural detention basins, grass swales, or mechanical trapping devices.

- **Lighting:** Of all developed areas adjacent to the preserve should be directed away from the preserve wherever feasible and consistent with public safety. Low-pressure sodium lighting should be used whenever possible.
- **Noise:** Uses adjacent to the preserve should be designed to minimize noise impacts. New development adjacent to the San Diego River will incorporate noise reduction strategies in site design, landscaping, and buffer separation.
- **Invasive Species:** No invasive nonnative plant or animal species can be introduced into areas immediately adjacent to the preserve. All open space slopes immediately adjacent to the preserve should be planted with native species that reflect the adjacent native habitat.
- **Fuel-Modification Zones:** Fuel-Modification Zones (FMZs) must be fully contained within the project site. Prior to implementing new developments adjacent to the Subarea Plan Preserve System, the local fire authority should review and approve proposed fuel-modification treatments to ensure that no new fuel modification will be required within the preserve properties.

City of San Diego

General Plan

The City of San Diego's *General Plan* presents goals and policies for biological resources in its *Conservation Element*, which generally aims to: (1) protect and conserve the landforms, canyon lands, and open spaces; (2) limit development of floodplains and sensitive biological areas, including wetlands, steep hillsides, canyons, and coastal lands; (3) manage and/or minimize runoff, sedimentation, and erosion due to construction activity in order to improve watershed management and water quality; (4) manage wetland areas for natural flood control and preserve wetland areas; (5) preserve areas within the MSCP and implement the goals and policies of the City of San Diego's MSCP Subarea Plan; (6) support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values; and (7) work with federal, state, and private organizations or people in order to implement an effective wetland management system (City of San Diego 2008).

The *Conservation Element* of the City of San Diego's *General Plan* contains the following policies that are relevant to the proposed project:

Policy CE-B.1: Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.

Policy CE-B.2: Apply the appropriate zoning and ESL regulations to limit development of floodplains, sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands.

Policy CE-E.2: Apply water quality protection measures to land development projects early in the process—during project design, permitting, construction, and operations—in order to minimize the quantity of runoff generated on site, the disruption of natural water flows, and the contamination of storm water runoff

- Increase on-site infiltration, and preserve, restore, or incorporate natural drainage systems into site design.

- Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas.
- Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible. o Increase the use of vegetation in drainage design.
- Maintain landscape design standards that minimize the use of pesticides and herbicides. o Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts.
- Apply land use, site development, and zoning regulation that limit impacts on and protect the natural integrity of topography, drainage systems, and water bodies.
- Enforce maintenance requirements in development permit conditions

Policy CE-G.1: Preserve natural habitats pursuant to the MSCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability.

Policy CE-G.3: Implement the conservation goals/policies of the City's MSCP SAP, such as providing connectivity between habitats and limiting recreational access and use to appropriate areas.

Policy CE-G.5: Promote aquatic biodiversity and habitat recovery by reducing hydrological alterations, such as grading a stream channel.

Policy CE-H.4: Support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions and values.

Municipal Code

Specific development regulations pertaining to sensitive biological resources exist in the City of San Diego's Municipal Code in the ESL Regulations (Chapter 14, Division 1, Section 143.0141). The ESL defines sensitive biological resources as those lands included within the MHPA as identified in the City of San Diego's MSCP Subarea Plan (City of San Diego 1997), the *City of San Diego Vernal Pool Habitat Conservation Plan* (VPHCP)(City of San Diego 2017), and other lands outside of the MHPA that contain: wetlands; vegetation communities classifiable as Tier I, II, IIIA, or IIIB; habitat for rare, endangered or threatened species; or narrow endemic species. The Biology Guidelines (City of San Diego 2018) provide guidelines to supplement the development regulation requirements. The study area is not within the City of San Diego's coastal overlay zone and therefore not subject to coastal overlay zone requirements.

MSCP Subarea Plan

The City of San Diego MSCP Subarea Plan describes how the City of San Diego implements its portion of the MSCP Plan. The City of San Diego subarea encompasses 206,124 acres within the MSCP study area.

The proposed project consists of approximately 64.2 acres within the City of San Diego, all of which are within the subarea plan area. The documents used to implement the MSCP within the City of San Diego include the *City of San Diego Subarea Plan* (City of San Diego 1997), the Final MSCP Plan, and the Implementing Agreement between the City of San Diego and the Wildlife Agencies (signed July 1997). The implementing agreement is the contract

between the City of San Diego and the Wildlife Agencies that ensures implementation of the subarea plan and thereby allows the City of San Diego to issue Take Permits for covered species within covered projects within its jurisdiction. The *City of San Diego Subarea Plan* is consistent with the MSCP Plan and qualifies as a standalone document to implement the City of San Diego's portion of the MSCP preserve.

The City of San Diego MHPA was developed by the City of San Diego in cooperation with the Wildlife Agencies, property owners, developers, and environmental groups. The City of San Diego's MHPA comprises approximately 56,831 acres and includes approximately 47,910 acres within City jurisdiction, and additional City of San Diego-owned lands (8,921 acres) in the unincorporated areas around San Vicente Reservoir, Otay Lakes, and Marron Valley. The Preserve Design Criteria contained in the MSCP Plan and the City Council-adopted criteria for the creation of the MHPA were used as guides in the development of the City of San Diego's MHPA. The MHPA delineates core biological-resource areas and corridors targeted for conservation. Within the MHPA, limited development may occur. The MHPA represents a "hard line" preserve, in which boundaries have been specifically determined. The San Diego River on the southern side of the project site is located within the City of San Diego's MHPA. Portions of the existing golf course within the City of San Diego were designated as MHPA.

The majority of the covered species are considered adequately conserved provided that the conditions described in *Species Evaluated For Coverage Under the MSCP* (City of San Diego 1997, Appendix A) are implemented. Appendix A of the City of San Diego MSCP Subarea Plan provides a full description of the conditions for coverage. Implementation of the conditions have been assured by incorporation of policies and/or guidelines into the appropriate section(s) of the Subarea Plan, associated land development regulations and/or biology guidelines.

MHPA Adjacency Guidelines

The MSCP City of San Diego Subarea plans addresses potential direct and indirect impacts on preserve areas from adjacent development in Section 1.4.3, Land Use Adjacency Guidelines of the MSCP (City of San Diego 1997). The Land Use Adjacency Guidelines provide requirements for land uses adjacent to the habitat preserve in order to minimize indirect impacts on sensitive resources. City of San Diego MHPA exists along the southern boundary of the site. The redesign of the existing golf course within and adjacent to MHPA considers the guidelines to ensure consistency with them. The guidelines are summarized below:

- **Drainage/Toxics:** All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA.
- **Lighting:** Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA.
- **Noise:** Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise-reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise-reduction measures should also be incorporated for the remainder of the year.
- **Barriers:** New development adjacent to the MHPA may be required to provide barriers (e.g., noninvasive vegetation, rocks/boulders, fences, walls, signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic-animal predation.
- **Invasives:** No invasive nonnative plant species will be introduced into areas adjacent to the MHPA.

- **Brush Management:** New residential development adjacent to the MHPA must include brush-management areas.
- **Grading/Land Development:** Manufactured slopes associated with site development must be included within the development footprint for projects within or adjacent to the MHPA.

3.3.4 Project Impact Analysis

3.3.4.1 Methodology

This section evaluates the potential impacts on biological resources from construction and operation of the proposed project. The area evaluated for biological resources includes the BSA. The 100-foot survey buffer included in the BSA is suitable for capturing potential indirect impacts from a project on biological resources. It is anticipated that indirect impacts beyond 100 feet in an urban environment would be diffused and would not significantly affect biological resources.

The following analysis of biological resources is based on the results of the Biological Study Report (Appendix E) prepared for the proposed project. The methods for the proposed project's evaluation of biological resources consisted of a literature and database review, general biological survey and vegetation mapping, special-status plant and animal surveys, and a jurisdictional delineation.

Impact Analysis Approach

The results of the literature review and field surveys are intended to evaluate on-site habitat types and assess the potential for the occurrence of special-status plant and wildlife species. The results were evaluated to determine potential impacts of the proposed project on biological resources during construction and operation. The proposed project was analyzed for compliance with applicable regulations that function to conserve and protect biological resources. If the proposed project could potentially impact biological resources through impacts on species or habitat, then a potential for significant impacts could exist. Biological resources may be either directly or indirectly affected by a project. Direct and indirect impacts may be either permanent or temporary in nature, as defined below:

- **Direct:** Any alteration, physical disturbance, or destruction of biological resources that would result from project-related activities is considered a direct impact. Examples include clearing vegetation, loss of individual species and/or their habitats, and encroaching into wetlands or a river.
- **Indirect:** As a result of project-related activities, biological resources may also be affected in a manner that is ancillary to physical impacts. Examples include elevated noise and dust levels, soil compaction, increased human activity, decreased water quality, and the introduction of invasive wildlife (i.e., domestic cats and dogs) and nonnative and/or invasive plants.
- **Permanent:** All impacts that result in the long-term or irreversible removal of biological resources are considered permanent. Examples include constructing a building or permanent road on an area containing biological resources.
- **Temporary:** Any impacts considered to have reversible impacts on biological resources can be viewed as temporary. Examples include the generation of fugitive dust during construction, or removing vegetation for the preparation of construction activities, and either allowing the natural vegetation to recolonize, or actively revegetating affected areas. Surface disturbance that removes vegetation and disturbs the soil is considered a long-term temporary impact because of slow natural recovery in arid ecosystems.

Where a potentially significant impact would be anticipated, proposed mitigation measures to address these potential impacts were developed.

3.3.4.2 Thresholds of Significance

The following significance criteria are based on State CEQA Guidelines Appendix G and provide the basis for determining the significance of impacts associated with biological resources that could result from implementation of the proposed project. These CEQA Appendix G thresholds apply to both the City of San Santee and the City of San Diego, unless otherwise noted.

The proposed project would have a significant impact on biological resources if it would result in the following:

1. 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 CDFW or USFWS.
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS.
3. Have a substantial adverse effect on state- or federally protected wetlands (e.g., marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means.
4. 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.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance or with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan.

Supplemental Thresholds for Biological Resources Located Within the City of San Diego

To determine the level of significance related to the proposed project's impacts on biological resources within the City of San Diego, the City of San Diego's CEQA Significance Determination Thresholds were utilized for determining significance. An answer in the affirmative to either of the following questions would indicate that a significant impact on biological resource would occur, and mitigation would be required. It should be noted that the following thresholds for biological resource sensitivity would apply only to the construction areas within the City of San Diego (e.g., a portion of the golf course and certain off-site improvements). These thresholds are included in the analysis below along with the CEQA thresholds and are labeled accordingly.

3.3.5 Project Impacts and Mitigation Measures

Threshold 1: *Would implementation of the proposed 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 CDFW and USFWS?*

Threshold 2 (City of San Diego): *Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?*

Impact Thresholds

According to the City of San Diego's Significance Determination Thresholds, potential impacts to biological resources are assessed through review of the project's consistency with the City's ESL regulations, Biology Guidelines, and MSCP Subarea Plan. Before a determination of the significance of an impact can be made, the presence and nature of the biological resources must be established. Thus, significance determination, pursuant to the City of San Diego's Significance Determination Thresholds, proceeds in two steps: (1) determine if significant biological resources are present and (2) determine the sensitivity of identified biological resources in terms of direct, indirect, and cumulative impacts that would result from project implementation.

1. Sensitive biological resources are defined by the City of San Diego Municipal Code as:
 - a. Lands that have been included in the MHPA as identified in the City of San Diego MSCP Subarea Plan (City of San Diego 1997);
 - b. Wetlands (as defined by the Municipal Code, Section 113.0103);
 - c. Lands outside the MHPA that contain Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines (July 2002 or current edition) of the Land Development manual;
 - d. Lands supporting species or subspecies listed as rare, endangered, or threatened;
 - e. Lands containing habitats with narrow endemic species as listed in the Biology Guidelines of the Land Development manual; and
 - f. Lands containing habitats of covered species as listed in the Biology Guidelines of the Land Development manual.
2. Occurrence of any of the following situations associated with identified biological resources may indicate significant direct and indirect biological impacts.

A Direct Impacts

- Any encroachment in the MHPA is considered a significant impact to the preservation goals of the MSCP. Any encroachment into the MHPA (in excess of the allowable encroachment by a project) would require a boundary adjustment, which would include a habitat equivalency assessment to ensure that what would be added to the MHPA is at least equivalent to what would be removed.
 - a. Lands containing Tier I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive and declining habitats. Impacts to these resources may be considered significant.

- b. Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts. Impacts to State or Federally listed species and all narrow endemics should be considered significant.
- c. Certain species covered by the MSCP and other species not covered by the MSCP may be considered significant on a case-by-case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP.

B Indirect Impacts

The Significance Determination Thresholds indicate that depending on the circumstances, indirect effects of a project may be as significant as the direct effects of the project. Indirect effects include, but are not limited to, the following impacts:

- A. Introduction of urban meso-predators into a biological system
- B. Introduction of urban runoff into a biological system
- C. Introduction of invasive exotic plant species into a biological system
- D. Noise and lighting impacts
- E. Alteration of a dynamic portion of a system, such as stream flow characteristics or fire cycles
- F. Loss of a wetland buffer that includes no environmentally sensitive lands

Impact Discussion

Construction of the proposed project would require demolition or grading equipment for site preparation, as well as the use of standard off-road construction equipment, including, but not limited to, dozers, excavators, loaders, backhoes, rollers, compactors, and scrapers. Additional equipment would include trucks for delivery of construction materials, disposal of demolished and excavated materials, and transport of water for dust control. Construction would temporarily disrupt the area because of increases in noise levels, truck traffic, and ground-disturbing activities.

Operation of the proposed project would result in a new country club and resort for tourist/visitor-serving commercial development, new residential development, a redesigned golf course, new and reconfigured roadways, and a multipurpose public trail.

Special-Status Plant Species

City of San Diego

As discussed in Section 3.3.2, Environmental Setting, no City of San Diego MSCP- or VPHCP-covered plant species were observed within the BSA, nor were CESA- or FESA-listed plant species were observed within the BSA. Four special-status plant species listed under the CRPR were observed within the BSA within the City of San Diego: Palmer's sagewort, San Diego marsh-elder, southern California black walnut, and southwestern spiny rush (Figure 3.3-2, Sensitive Plant Species). California black walnut and southwestern spiny rush were observed within avoidance areas within the proposed project site in the City of San Diego and would not be impacted. Palmer's sagewort and San Diego marsh-elder were present within the BSA buffer but were not detected in the proposed project site.

San Diego marsh-elder is a CRPR 2B.2 species and is therefore considered rare or endangered under State CEQA Guidelines Section 15380. Palmer's sagewort, Southern California black walnut, and southwestern spiny rush are CRPR 4.2 species, meaning they are plants of limited distribution but are locally common. These CRPR 4.2 species do not clearly meet CEQA standards and thresholds for impact considerations because they do not have local rarity, they are not peripheral to the taxa's distribution, and they do not occur in unusual substrates or habitat. Palmer's sagewort, Southern California black walnut, and southwestern spiny rush are therefore not considered endangered, rare, or threatened under CEQA.

City of Santee

Southwestern spiny rush was the only special-status plant species observed within City of Santee and was only present outside of the proposed project site (near the San Diego River).

Focused surveys were conducted in the BSA for the federally listed endangered San Diego ambrosia, but none were observed during times of year when the species would be most readily detectable. As such, San Diego ambrosia is considered absent from the BSA.

No special-status plant species would be directly affected by project construction or operation. As a result, implementation of the proposed project would not have a substantial adverse effect on special-status plant species, and no impact would occur.

Special-Status Wildlife Species

The proposed project has potential to affect 12 special-status and/or MSCP covered animal species, including six special-status and/or MSCP covered bird species observed within the BSA: Cooper's hawk, least Bell's vireo, vermilion flycatcher, western bluebird, yellow warbler, and yellow-breasted chat; MSCP-covered southern mule deer observed in the BSA; as well as three species determined to have a high potential to occur: Belding's orange-throated whiptail, two-striped garter snake, and white-tailed kite. Focused surveys were conducted for southwestern pond turtle, California gnatcatcher, southwestern willow flycatcher, and Crotch's bumble bee were negative and the species were therefore considered absent from the BSA. The federal candidate insect species monarch butterfly was observed nectaring on flowers within the project area; no suitable milkweed breeding habitat was observed. Southern mule deer is not considered special status but has aesthetic and intrinsic values, thereby being an important species to protect (City of San Diego 1998). Mule deer is a covered species under the MSCP and is known to use the project site. Although western spadefoot and western burrowing owl were determined to have a low potential to occur, these species are addressed below due to their possible future listing at the federal level and future presence. Double-crested cormorant is not a special-status or MSCP-covered species, but the on-site rookery is a CDFW-protected wildlife nursery site and is therefore discussed in the Wildlife Nursery Sites section under Threshold 4. Avoidance and minimization measures are proposed to ensure no direct or indirect impacts occur to breeding individuals. Loss of occupied habitat would be fully compensated in-kind through on- and off-site preservation, as detailed in Appendix E, Section 3.3.5, Avoidance and Mitigation Measures.

Least Bell's Vireo

City of Santee

The proposed project would have permanent direct impacts of up to 0.77 acres of occupied least Bell's vireo breeding habitat within designated critical habitat within the City of Santee, within the clubhouse/hotel, golf course redesign, and fuel modification areas (riparian habitat in Residential North was unoccupied). The 0.77 acres includes 0.43 acres of southern cottonwood–willow riparian forest (including disturbed) and 0.34 acres of mule fat scrub – disturbed. The loss of 0.77 acres of occupied breeding habitat for least Bell's vireo species would be a potentially significant impact (**Impact-BIO-5**). The proposed project would have temporary direct impacts of up to 0.09 acres of occupied least Bell's vireo breeding habitat within designated critical habitat within the City of Santee, including 0.07 acres of southern cottonwood–willow riparian forest (including disturbed) and 0.02 acres of mule fat scrub – disturbed.

City of San Diego

MSCP conditions of coverage in the MSCP Plan (City of San Diego 1998) require that surveys using appropriate protocols be conducted in suitable habitat proposed to be affected. Although no suitable habitat for least Bell's vireo would be affected within the City of San Diego, surveys were conducted in all suitable habitat in the BSA in 2019. The San Diego River was considered occupied and was not resurveyed in 2022. Surveys were conducted for least Bell's vireo in 2022 in potential habitat within City of San Diego that are outside of the San Diego River (South Channel); South Channel is known to be occupied and was therefore not resurveyed. The proposed project would incorporate mitigation measures consistent with CWA 404(b)1 guidelines. The proposed project would not create conditions attractive to brown-headed cowbirds. As such, the proposed project does not need to monitor and control cowbirds.

Other Special-Status Animal Species

The proposed project would also have permanent direct impacts on approximately 0.80 acres of southern cottonwood–willow riparian forest (including disturbed), which is potentially suitable as breeding habitat for yellow warbler, yellow-breasted chat, western bluebird, vermilion flycatcher, Cooper's hawk, and white-tailed kite; suitable as habitat for two-striped garter snake and orange-throated whiptail; and suitable habitat for mule deer. The loss of 0.80 acres of habitat for these species would constitute a potentially significant impact on special-status species (**Impact BIO-6**).

No Cooper's hawk or white-tailed kite nests or nesting activities were observed within the BSA during project surveys. Conditions of MSCP coverage for Cooper's hawk include a 300-foot impact-avoidance buffer around active nests and minimization of disturbance to oak riparian forests (City of San Diego 1998). In addition, the proposed project has been redesigned to minimize disturbance to riparian forests within City of Santee and would completely avoid impacts on riparian forests within the City of San Diego.

The proposed project would have no effect on monarch butterfly breeding or overwintering habitat. The BSA has little in the way of nectaring resources for monarch, being an active golf course with limited flowering ornamental vegetation. The proposed project would not significantly alter the distribution or abundance of the limited nectar resources present within BSA.

Impacts on native or naturalized vegetation during the breeding season would have the potential to kill nesting birds or their eggs or young, including special-status birds, such as least Bell's vireo, yellow warbler, yellow-breasted chat,

vermillion flycatcher, western bluebird, Cooper's hawk, and white-tailed kite. These potential impacts would be significant (**Impact BIO-7**). In addition, although Crotch's bumble bee is not known from the BSA, and the project site has low potential to support nesting or foraging Crotch's bumble bee. If the species were present underground during ground disturbance, then impacts on Crotch's bumble bee nests would be potentially significant (**Impact BIO-8**).

Western Spadefoot

The project site has only low potential with respect to western spadefoot occurrence. The western spadefoot is not known from the BSA and the project site has low potential to support breeding or estivating western spadefoot. Minimal potential breeding habitat exists within the impact area, and a survey in 2025 was negative. However, as a conservative measure, if this primarily subterranean species is present during ground disturbance, impacts on upland western spadefoot would be potentially significant (**Impact BIO-9**).

Western Burrowing Owl

Western burrowing owl is not known from the BSA, suitable habitat was not found within the BSA, and the project site has low potential to support wintering or breeding western burrowing owl. If suitable burrows become present within the open habitats on site, then there is potential for them to colonize the BSA. Burrowing owl may colonize during any time of the year. If the species were present, then impacts to western burrowing owl would be potentially significant (**Impact BIO-10**).

Cormorant Rookery

Because double-crested cormorants are only considered CDFW sensitive at nesting sites, potential indirect effects are discussed under **Impact BIO-11**, Cormorant Rookery, in the Wildlife Nursery Sites section under Threshold 4.

Construction Noise

The proposed project also has the potential to result in various temporary indirect impacts that may result from project construction activities, and a variety of permanent indirect impacts on surrounding sensitive biological resources. Residential development can promote habitat loss and fragmentation, degrade soil, air, water, and visual quality, promote brood parasitism, by increasing cowbird populations, introduce nonnative species, alter the composition of wildlife communities, and increase predation by domestic animals. Commercial development may have fewer indirect impacts, although lighting impacts may be greater (City of San Diego 1998).

Indirect, temporary impacts on special-status animal species could occur during project construction due to construction-related noise from such sources as clearing, grubbing, and grading. Construction activities would comply with local agency construction noise requirements of the Cities of Santee and San Diego, as contained in Section 5.04 of the City of Santee's Municipal Code and Section 5.04.090 of the City of San Diego Municipal Code. These restrictions prohibit construction activities between the hours of 7:00 p.m. and 7:00 a.m. and on Sundays and legal holidays and limit construction noise levels to not exceed an average of 75 A-weighted decibels (dBA) at the property line of a residential use over an 8- or 12-hour period.

Nesting special-status bird species can be adversely affected by construction noise levels that exceed a 60 dBA equivalent sound level (L_{eq}) hourly average. Construction noise could cause an indirect, temporary impact on special-status animal species even when in compliance with the Cities of Santee's and San Diego's noise requirements.

Indirect temporary impacts from construction noise could also be potentially significant, particularly if they occur during the breeding season of special-status avian species (**Impact BIO-12**).

Indirect Human Activity

Land uses planned or existing adjacent to the MHPA include single and multiple family residential, active recreation, commercial, industrial, agricultural, landfills, and extractive uses. Land uses adjacent to the MHPA would be managed to ensure minimal impacts on the MHPA (City of San Diego 1998). The MHPA was mapped over the existing golf course which was established in 1958. There are other places within the City of San Diego where the MHPA overlaps with golf courses. As such, active recreation may be an acceptable use adjacent to the MHPA. One of the goals of the proposed project is to increase the active recreational use of the golf course. Golf course users are expected to remain on the golf course and not enter undeveloped areas of the adjacent MHPA; the presence of an up to 12-foot-tall, fencing existing physical berm and the density of adjacent riparian forest would help prevent trespass. Therefore, there would be no potentially significant indirect impacts from active recreation.

The existing path along the berm between the golf course and the San Diego River (South Channel) currently allows for recreational use along the riparian boundary. SANDAG would make improvements to this path as part of its planned multi-use San Diego River Trail (SANDAG 2017).

However, the proposed project would increase human activity in the vicinity of sensitive habitat, and additional measures, such as signage, are required to reduce indirect impacts from human activity to a less-than-significant level (**Impact BIO-13**).

Nuisance Animals

Argentine ants (*Linepithema humile*) are a nonnative species of ant whose habitat is promoted by irrigation and urbanization (USFWS 2006). Argentine ants may pose a problem to the least Bell's vireo in the riparian-urban interface of the San Diego River. The current conditions of irrigation needed to sustain a golf course may contribute to Argentine ant populations; however, conversion of a portion of the golf course to residential and commercial development is not expected to significantly increase water use, and thus Argentine ant populations, compared to existing conditions.

Brown-headed cowbirds are nest parasites of native songbirds, including special-status species such as least Bell's vireo. Brown-headed cowbirds were observed in low numbers during the surveys for least Bell's vireo and southwestern willow flycatcher in 2019. Brown-headed cowbird populations can be augmented by golf courses that serve as foraging habitat. Implementation of the proposed project would reduce the total area of golf course. As such, the proposed project is not expected to promote the increase of brown-headed cowbird populations.

Animals associated with residential development can have a negative impact on wildlife. Free-ranging cats and off-leash dogs can prey on wildlife and have potential to spread zoonotic diseases to wildlife and other domestic animals. Because least Bell's vireos normally construct nests at the low height of approximately 3 feet, there is the potential for increased predation of adult and nestling least Bell's vireo that could result from an increased abundance of free-range cats. Increased predation of special-status bird species would represent a potentially significant impact (**Impact BIO-14**). Homeowner education would be required to reduce the potential increase of domestic pets generated from the due to the proposed residential homes adjacent to existing open space on the project site.

Nighttime Lighting

Artificial nighttime lighting can cause negative effects on wildlife, including disrupting foraging and dispersal patterns, increasing predation risk, disrupting biological clocks, and increasing mortality risks along roads (Beier 2006). Nighttime lighting within the golf course would be compliant with City of San Diego Outdoor Lighting Regulations Section 142.0740(f) and MHPA Land Use Adjacency Requirements, so that any exterior lighting would be limited to low-level lights and shielded to minimize the amount of light entering the adjacent MHPA and sensitive biological resource areas. All development within the City of Santee is required to conform with the City of Santee's Municipal Code 13.30.030 performance standards, which state, in part, "All lighting will be designed and adjusted to reflect light away from any road or street, and away from any adjoining premises. All lights and illuminated signs will be shielded or directed so as to not cause glare on adjacent properties or to motorists." Development within the City of Santee would be designed so that project lighting does not cast light into natural or revegetation areas. Conformance with the City of Santee's Municipal Code and implementation of project design features would prevent significant indirect impacts of nighttime lighting on adjacent sensitive habitat.

In addition to mitigation, project design features would be implemented to minimize indirect impacts resulting from human activity, nuisance animals, invasive plants, and nighttime lighting. Permanent fencing would be installed around biological open space, which is currently unprotected, and signs precluding access would be posted. Only noninvasive plant species (i.e., species not listed on the California Invasive Plant Inventory prepared by the California Invasive Plant Council (Cal-IPC 2006) would be included in the landscape plan for the site. Because the golf course would be planted with a hybrid Bermuda grass species per industry standards, a 10-foot-wide buffer would be established to separate all golf turf from riparian areas. The buffer zone would be planted with native bunch grasses, which would contain the Bermuda grass within the playable golf boundary. The buffer zones are noted on the Grassing Plan for the golf course. Project-related lighting would be required to adhere to the City of Santee Municipal Code. Lighting within the proposed project footprint adjacent to undeveloped habitat would be of the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from these areas.

City of San Diego – Summary

The following project-specific analysis is based on the City of San Diego's Significance Determination Thresholds, which are outlined above under Threshold 2:

1. Sensitive biological resources are defined by the City of San Diego Municipal Code as:
 - a. Within the project site, the MHPA covers 12.86 acres of golf course and 0.33 acres of avoided riparian habitat. No sensitive vegetation communities within the MHPA would be impacted as a result of the proposed project, and the use would remain a golf course.
 - b. The proposed project would not result in impacts to City of San Diego designated wetlands.
 - c. The proposed project would result in the permanent loss of 0.19 acres of coastal sage scrub (Tier II sensitive upland) outside of the MHPA (**Impact BIO-1**).
 - d. No City of San Diego MSCP- or VPHCP-covered plant species were observed within the BSA.
 - e. No lands containing habitats with narrow endemic species, as listed in the Biology Guidelines of the Land Development manual, would be impacted by the proposed project.
 - f. The proposed project would not have impacts to lands containing habitats of covered species as listed in the Biology Guidelines of the Land Development manual.

3. Occurrence of any of the following situations associated with identified biological resources may indicate significant direct and indirect biological impacts:

A. Direct Impacts

- a. Within the project site, the MHPA covers 12.86 acres of golf course and 0.33 acres of avoided riparian habitat. No sensitive vegetation communities within the MHPA would be impacted as a result of the proposed project, and the use would remain a golf course.
- b. The proposed project would result in the permanent loss of 0.19 acres of coastal sage scrub (Tier II sensitive upland) outside of the MHPA (**Impact BIO-1**).
- c. No sensitive species would be directly impacted by the proposed project.
- d. No sensitive species would be directly impacted by the proposed project.

B. Indirect Impacts

The Significance Determination Thresholds indicate that depending on the circumstances, indirect effects of a project may be as significant as the direct effects of the project. Indirect effects include, but are not limited to, the following impacts:

- a. See **Impact BIO-14**.
- b. See **Impact BIO-13**.
- c. See **Impact BIO-13**.
- d. See **Impact BIO-12**.
- e. The proposed project would not impact any stream channels, nor would it change fire cycles.
- f. The proposed project would not result in impacts to wetland buffers.

Impact Determination

Implementation of the proposed project would have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW and USFWS. Potentially significant impact(s) include the following:

Impact BIO-5. Least Bell's Vireo Breeding Habitat (City of Santee).

The loss of 0.77 acres of occupied breeding habitat for least Bell's vireo species would be a potentially significant impact. The proposed project would have temporary direct impacts on up to 0.09 acres of occupied least Bell's vireo breeding habitat within designated critical habitat within the City of Santee, including 0.07 acres of southern cottonwood–willow riparian forest (including disturbed) and 0.02 acres of mule fat scrub – disturbed.

Impact BIO-6. Non-listed Special-Status Species Habitat.

The proposed project would have permanent direct impacts on up to 0.80 acres of southern cottonwood–willow riparian forest (including disturbed) that is potentially suitable as breeding habitat for yellow warbler, yellow-breasted chat, western bluebird, vermilion flycatcher, Cooper's hawk, and white-tailed kite; suitable as habitat for two-striped garter snake; and suitable as habitat for mule deer (Table 3.3-7). The loss of 0.80 acres of habitat for these species would be considered a potentially significant impact to special-status species.

Conditions of MSCP coverage for Cooper's hawk include a 300-foot impact avoidance buffer around active nests and minimization of disturbance to oak riparian forests (City of San Diego 1998). No Cooper's hawk nests, or nesting activities were observed within the BSA during project surveys. The project has been redesigned to minimize disturbance to riparian forests within the City of Santee and would completely avoid impacts on riparian forests within the City of San Diego.

Impact BIO-7. Nesting Birds.

Impacts on native or naturalized vegetation during the breeding season have the potential to kill nesting birds or their eggs or young, including special-status birds, such as least Bell's vireo, yellow warbler, yellow-breasted chat, western bluebird, vermilion flycatcher, Cooper's hawk, and white-tailed kite. Any project-related activities that result in the death of nesting birds could be a violation of federal and state laws and would be a significant impact.

Impact BIO-8. Crotch's Bumble Bee.

Although Crotch's bumble bee is not known from the BSA, and the project site has low potential to support nesting or foraging Crotch's bumble bee, if the species were present, then underground during ground disturbance, then impacts on a Crotch's bumble bee nest would be significant.

Impact BIO-9. Western Spadefoot.

Although western spadefoot is not known from the BSA, the project site has low potential to support breeding or estivating western spadefoot, and a survey in 2025 was negative, if the species were present, then impacts to western spadefoot would be significant.

Impact BIO-10. Western Burrowing Owl.

Although western burrowing owl is not known from the BSA, suitable habitat was not found within the BSA, and the project site has low potential to support wintering or breeding western burrowing owl, if suitable burrows become present within the open habitats on site, then there is potential for them to colonize the BSA. Burrowing owl may colonize during any time of the year. If the species were present, then impacts to western burrowing owl would be significant.

Impact BIO-11. Cormorant Rookery.

Construction noise and activity associated with the regrading and redesign of the golf course and construction of the golf resort, if they occur during the breeding season, have potential to disrupt the breeding activities of double-crested cormorants. Disruption or loss of breeding at this rookery would be a significant impact on a wildlife nursery site.

Impact BIO-12. Construction Noise.

Indirect, temporary impacts on special-status animal species could occur during project construction due to construction-related noise from such sources as clearing, grubbing, and grading. Nesting special-status bird species can be adversely affected by construction noise levels that exceed a 60 dBA L_{eq} hourly average or ambient conditions (whichever is greater). Construction noise could cause an indirect, temporary impact on special-status animal species even with compliance with the noise requirements of the Cities of Santee and San Diego. These

indirect, temporary impacts from noise could be potentially significant, particularly if they occur during the breeding season of special-status avian species.

Impact BIO-13. Indirect Human Activity.

The proposed project would increase human activity in the vicinity of sensitive habitat, including occupied vireo habitat, on the western and northeastern sides of the project as the existing golf course land use adjacent to the San Diego River habitat is converted to residential and commercial land uses. Project design features such as fences and retaining walls would help reduce potential indirect impacts from human activity. However, additional measures, such as signage, are required to reduce indirect human activity impacts to a less-than-significant level.

Impact BIO-14. Domestic Animals.

Animals associated with residential development can have a negative effect on wildlife. Free-range cats and off-leash dogs can prey on wildlife and have potential to spread zoonotic diseases to wildlife and other domestic animals. Because least Bell's vireo normally constructs nests at the low height of approximately 3 feet, there is the potential for increased predation of adult and nestling least Bell's vireo by an increased abundance of free-range cats. Increased predation of special-status bird species would represent a potentially significant impact. Homeowner education shall be required to reduce the potential increase of domestic pets generated due to the proposed residential homes adjacent to existing open space.

Mitigation Measures

Implementation of these measures would result in a less than significant impact with mitigation incorporated under CEQA. **MM-BIO-1 through MM-BIO-11** are listed under Threshold 2.

MM-BIO-12. Minimize Indirect Noise Impacts on Non-listed Riparian Birds and Raptors. The operation of construction equipment (e.g., backhoes, loaders, bulldozers, excavators, skid steers, graders) and construction activities (building construction) shall not occur within a "noise impact area" (as defined below) during the breeding seasons for yellow warbler, yellow-breasted chat, and vermilion flycatcher (February 15 through August 31), or nesting raptors (January 15 through July 15). If it is not feasible to avoid operation of construction equipment during any of these breeding seasons, then a pre-construction nesting survey shall be conducted within potential habitat of any of these species within 150 or 300 feet of proposed construction equipment activity. Pre-construction surveys shall be conducted by a qualified biologist no more than 72 hours prior to the start of construction to determine if active nests of these species are present within the areas potentially impacted by noise. The qualified biologist conducting the survey(s) shall have, at a minimum, a bachelor's degree in biology, ecology, zoology, or a related field of science, and at least 2 years of experience conducting biological field surveys, including surveys for nesting birds.

The "noise impact area" is defined as up to 300 feet from the noise source to the nest for raptors and up to 150 feet from the noise source to the nest for the cormorant rookery and for other sensitive riparian species, including yellow warbler, yellow-breasted chat, and vermilion flycatcher. If it is determined at the completion of pre-construction surveys that active nests belonging to yellow warbler, yellow-breasted chat, vermilion flycatcher, or raptors are absent from the noise impact area, construction shall be allowed to proceed. If pre-construction surveys determine the presence of active nests belonging to any of these sensitive species, then construction shall (1) be

postponed within the noise impact area until a qualified biologist determines any nests are no longer active or until after the respective breeding season; (2) be conditionally allowed within portions of the noise impact area if intensive monitoring by the qualified biologist determines that nesting activities are not being substantially (i.e., adults appearing agitated, scolding more, attracting the attention of brown-headed cowbirds, or leaving the nest site more than average) disrupted by adjacent construction activity; or (3) not occur until a temporary noise barrier or berm is constructed at the edge of the construction limits and/or around the piece of equipment to ensure that noise levels within the noise impact area are reduced to below 1-hour average of 60 dBA L_{eq} or ambient noise levels, whichever is greater, at the nest location. Decibel output shall be confirmed by a qualified noise specialist, and intermittent monitoring by a qualified biologist shall be required to ensure that conditions have not changed. If a temporary noise barrier or berm is constructed, the qualified biologist must be present to ensure that construction of the noise attenuation feature does not itself result disruption of nesting behavior. Factors used to determine and guide the appropriate buffer distance shall include individual pair behavior responses, amount of buffering topography or structures, proximity to existing disturbance, and ambient noise levels.

MM-BIO-13. Avoid Disturbance of Vegetation During Bird Nesting Season. To comply with state and federal protections on nesting birds, clearing, trimming, and grubbing of vegetation shall occur September 1 through February 14 (i.e., outside of the general bird breeding season), and tree removal shall occur July 16 through January 14 (outside of the raptor breeding season). If tree or vegetation trimming, clearing, or grubbing cannot feasibly occur outside of these breeding seasons, then pre-construction nesting surveys, as described below, shall be conducted by a qualified biologist prior to initiating vegetation trimming, clearing, or grubbing activities.

The nesting survey for native birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall consist of one pre-construction nesting survey conducted no more than 72 hours prior to the commencement of vegetation trimming, clearing, or grubbing to determine if active nests of these species are present in the affected areas. If pre-construction surveys determine the presence of active nests, then construction shall (1) be postponed within the noise impact area until a qualified biologist determines any nests are no longer active or until after the respective breeding season; (2) be conditionally allowed within portions of the noise impact area if intensive monitoring by the qualified biologist determines that nesting activities are not being substantially (i.e., adults appearing agitated, scolding more, attracting the attention of brown-headed cowbirds, or leaving the nest site more than average) disrupted by adjacent construction activity; or (3) not occur until a temporary noise barrier or berm is constructed at the edge of the construction limits and/or around the piece of equipment to ensure that noise levels within the noise impact area are reduced to below 1-hour average of 60 dBA L_{eq} or ambient noise levels, whichever is greater, at the nest location. Decibel output shall be confirmed by a qualified noise specialist, and intermittent monitoring by a qualified biologist shall be required to ensure that conditions have not changed. If a temporary noise barrier or berm is constructed, the qualified biologist must be present to ensure that construction of the noise attenuation feature does not itself result disruption of nesting behavior. Factors used to determine and guide the appropriate buffer distance shall include individual pair behavior responses, amount of buffering topography or structures, proximity to existing disturbance, and ambient noise levels.

The qualified biologist shall determine the appropriate nest avoidance distance based on species type, habitat location and condition, and behavior of the nesting pair. The qualified biologist conducting the survey(s) shall have, at a minimum, a bachelor's degree in biology, ecology, zoology, or a related field of science, and at least 2 years of experience conducting biological field surveys, including surveys for nesting birds.

MM-BIO-14. Mitigation, Monitoring, and Reporting Conditions for Potential Impacts to Occupied Least Bell's Vireo Habitat. Prior to the issuance of grading permits, the Cities of Santee and San Diego shall verify that the following project requirements regarding least Bell's vireo are shown on the construction plans. No clearing, grubbing, grading, or other construction activities shall occur during the least Bell's vireo breeding season (March 15 through September 15) until the following requirements have been met to the satisfaction of the applicable jurisdiction issuing the grading permit:

- 1 A qualified biologist shall perform a clearance survey in those wetland areas suitable for the presence of least Bell's vireo. Surveys for the species shall be conducted within the current breeding season, if applicable, and include at least 3 weekly surveys and monthly follow-up surveys. If least Bell's vireo is present, then the following conditions must be met:
 - A Occupied habitat shall be staked or fenced under the supervision of a qualified biologist; and
 - B From March 15 through September 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 A-weighted decibels (dBA) equivalent sound level (L_{eq}) hourly average (or to the ambient noise level if greater) at the edge of occupied least Bell's vireo habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA L_{eq} hourly average (or to the ambient noise level if greater) at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City of San Diego City Manager or the City of Santee City Planner (depending on applicable jurisdiction) at least 2 weeks prior to the commencement of construction activities in the affected area. Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities (avoidance buffers) shall be staked or fenced under the supervision of a qualified biologist. This noise analysis may include noise attenuation requirements, including altering grading operations, phasing grading, cessation of vehicle idling, and using quieter machinery near sensitive resources, to obtain the necessary noise levels; or
 - C At least 2 weeks prior to the commencement of construction activities in the affected area, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dBA L_{eq} hourly average (or the ambient noise level if greater) at the edge of habitat occupied by least Bell's vireo. If a temporary noise barrier or berm is constructed, the qualified biologist must be present to ensure that the construction of the noise attenuation feature does not itself result in disruption of nesting behavior. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring (as described below) shall be conducted at the edge of the occupied habitat to ensure that noise levels do not exceed

60 dBA L_{eq} hourly average (or ambient noise levels if greater). If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, or the nesting activities are being substantially disrupted by adjacent construction activity, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16).

- 2 Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dBA L_{eq} hourly average or to the ambient noise level if greater. If not, other measures shall be implemented in consultation with the biologist, the City of San Diego City Manager, or the City of Santee City Planner (depending on the applicable jurisdiction), as necessary, to reduce noise levels to below 60 dBA L_{eq} hourly average or to the ambient noise level if greater. Such measures may include limitations on the placement of construction equipment and the simultaneous use of equipment.

MM-BIO-15. Crotch's Bumble Bee Pre-construction Surveys. Prior to the initiation of ground-disturbing activity during the Colony Active Period (April 1 through August 31), then pre-construction surveys for active bee nest colonies shall be required no more than 5 days prior to any ground disturbance or vegetation removal. The following method for nest surveys shall be used unless the Wildlife Agencies provide an updated method based on current understanding of bumble bee nests in the future:

- Within non-developed habitats (golf course areas are considered to be developed), the biologist shall look for nest resources (e.g., burrows) suitable for bumble bee use. If an area of bumble bee activity is detected, the biologist shall watch potential nest resources for a period of time (up to 30 minutes if early in the Colony Active Period, and up to 10 minutes during the peak of the Colony Active Period) looking for exiting or entering worker bumble bees. Worker bees should arrive and exit an active nest site with frequency, although the rate can vary depending on whether it is early/late or at the peak of the Colony Active Period. If a bumble bee worker is detected, then a representative bee shall be identified to species. This should be possible without capture in San Diego County. Biologists shall ensure that 100% visual coverage of all potential burrow resources are surveyed. Therefore, the biologist shall select a view that balances viewing multiple burrows while ensuring detection if bees are present. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point, but this limit shall not exceed 50 feet. The biologist shall reduce the 50-foot limit as necessary to ensure 100% visual coverage of potential burrow resources depending on topography, vegetation height and cover, and other factors. This approach shall allow the biologist to assess multiple burrows at one time to sufficiently determine if bees are entering/exiting them. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes). A photo voucher of the bee species shall be collected, and the location mapped using GPS. If identification is not feasible without capture, then the project proponent shall consult with the California Department of Fish and Wildlife prior to allowing the biologist to capture and identify to species (using the protocol for the California Bumble Bee Atlas project managed by the Xerces Society) to determine if a California Endangered Species Act Memorandum of Understanding and/or Scientific Collecting Permit would be required.

- A written survey report shall be submitted to the City of Santee and City of San Diego within 30 days of the pre-construction nest surveys. The report shall include survey methods, weather conditions, and survey results, including botanical results, a list of insect species observed, and a figure showing the locations of any Crotch's bumble bee nest sites or individuals observed (as appropriate for the level of survey required). The survey report shall include the qualifications of the surveyor(s) and approved biologist(s) for identification of photo vouchers and a detailed habitat assessment. If Crotch's bumble bee nests are observed, location information shall be submitted to the California Natural Diversity Database at the time of, or prior to, submittal of the survey report.
- If a Crotch's bumble bee nest is detected, the project biologist shall establish, monitor, and maintain a no-work buffer around the nest. The size and configuration of the no-work buffer shall be based on best professional judgement of the project biologist in consultation with the Wildlife Agencies. The buffer shall provide at least 50 feet of clearance around nest entrance(s). Construction activities shall not occur within the no-work buffer until the colony is no longer active. To determine that a nest is no longer active, the nest shall be observed for a minimum of 60 minutes each day across a minimum of 3 days during suitable flight weather (i.e., ambient air temperature between 60°F and 90°F, winds under 10 miles per hour, and no precipitation higher than a drizzling rain). If no bees are seen flying in or out of the nest by the end of the observation period, it shall be determined that the nest is no longer active. If project activities occur outside of the Colony Active Period, then pre-construction surveys for active bee nest colonies and avoidance measures are not required.

MM-BIO-16. **Western Spadefoot Pre-construction Survey.** During the rainy season (typically begins with the first rains in October) prior to the issuance of the grading permit, the project must either perform an egg mass/larval survey for western spadefoot within standing water in the biological study area (BSA) or perform nocturnal eyeshine surveys for adults across the BSA. If performed, egg mass/larval surveys must be performed in March and/or April. If performed, nocturnal adult surveys must be performed during or the night after the first three large (0.25-inch or greater) rain events of the winter. If the standing water or nocturnal survey is negative, then no additional measures are required. If the surveys find western spadefoot, then a 1,500-foot buffer shall be applied, originating from the breeding resource. The buffer area between the BSA open space limit and farthest project impact limit shall be enclosed by exclusion fencing. That interior area shall be surveyed during the first three rain events, and western spadefoot shall be relocated outside of the buffer area within the BSA. A relocation plan shall be prepared that identifies the specific methods and relocation areas, shall be prepared prior to implementation, and shall be approved by the lead agency. Any permits required to perform this task shall be acquired.

This measure is not required north of the San Diego River (north) because that section of the San Diego River does not provide suitable habitat for western spadefoot and would provide a suitable buffer if spadefoot were found south of there.

MM-BIO-17. **Western Burrowing Owl Pre-construction Survey.** Prior to grading activities, the project shall determine if suitable burrowing owl nesting and overwintering habitat occurs within the project site based on a current habitat assessment. If suitable burrows are identified (e.g., greater than 11 centimeters in diameter and greater than 150 centimeters in depth), then the following shall be implemented:

- Pre-construction burrowing owl surveys shall be conducted consistent with the 2012 California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation. No more than 14 days prior to the initiation of project activities, a qualified biologist shall conduct at least two surveys at least 7 days apart, with the final survey conducted no more than 48 hours prior to the initiation of project activities. A report of the survey results, including mapping of any occupied burrows (including natural or constructed), burrowing owls, or burrowing owl sign observed, shall be submitted to the Cities of Santee and San Diego for their review and approval prior to initiation of project activities. Pre-construction surveys that are not seasonally dependent shall be required whenever ground disturbance is planned to address potential impacts during both overwintering and nesting seasons. If the survey is negative, then nothing more is required. If an occupied burrow or burrowing owl is found, then the following measures shall be implemented:
 - Depending on the jurisdiction (City of Santee/City of San Diego) and their respective Multiple Species Conservation Program requirements at the time, either those requirements shall be implemented, or a CDFW 2081 Incidental Take Permit shall be secured and the following shall be implemented unless superseded by the Multiple Species Conservation Program or Incidental Take Permit:
 - Project activities shall be restricted within occupied burrowing owl habitat (inclusive of the appropriate buffer) during the breeding season (February 1 through August 31) until nesting is complete (i.e., the young have dispersed and are fledged, independently foraging, and no longer using the burrows or burrow complex, and/or adults are no longer nesting).
 - During the breeding season, buffers shall be established by a qualified biologist consistent with guidance provided in the 2012 CDFW Staff Report on Burrowing Owl Mitigation. Appropriate buffer size shall depend on the time of year, level of disturbance, and project-specific site conditions. Buffers around active nesting sites shall be a minimum of 200 meters (656 feet) regardless of the time of year. The monitoring biologist shall have the authority to order stop work if burrowing owls exhibit distress or abnormal behavior and shall consult with the appropriate entities to determine next steps (e.g., stop work or increase buffers).
- Where impacts to burrowing owl are unavoidable, the following measures shall be required:
 - If suitable but unoccupied burrows cannot be avoided, burrow exclusion may be appropriate. Burrow exclusion shall only be allowed after the burrow has been determined by a qualified biologist to be inactive. No exclusions shall be permitted during the nesting season when there is evidence of burrowing owl activity. Prior to the initiation of any burrow exclusions, a Burrow Exclusion Plan shall be submitted to the Cities of Santee and San Diego and CDFW for review and approval.
 - Mitigation for impacts to occupied habitat shall occur through the conservation of occupied burrowing owl habitat at a ratio of no less than 1:1 for the territory of the burrowing owl. If occupied burrowing owl habitat is not available for mitigation within the Santee Subarea Plan Area, lands with potential to be occupied through appropriate restoration, management, and enhancement of burrowing owl nesting and foraging requirements may be considered. The land to be conserved shall be approved by the Cities of Santee and San Diego and CDFW. The land to be conserved shall be secured by a legal instrument (e.g., conservation easement) to the satisfaction of CDFW.

MM-BIO-18. Homeowner Education Program. Prior to the issuance of a building permit for the residential homes on the project site, a homeowner education program shall be prepared by a qualified biologist for approval by City of Santee and distributed by the applicant to inform homeowners of the need to keep pets outside of the adjacent open space areas.

Level of Significance After Mitigation

With implementation of **MM-BIO-3 through MM-BIO-10** and **MM-BIO-14**, potential impacts on habitat occupied by least Bell's vireo (**Impact BIO-5**) would be minimized and mitigated to a less-than-significant level.

With implementation of **MM-BIO-1 through MM-BIO-8**, potential impacts on habitat of non-listed special-status species (**Impact BIO-6**) would be less than significant through implementation of habitat-based mitigation and avoidance.

Potentially significant direct impacts on nesting birds (**Impact BIO-7**) and indirect effects of construction noise (**Impact BIO-12**) and human activity (**Impact BIO-13**) would be reduced to less than significant with implementation of **MM-BIO-12, MM-BIO-13, and MM-BIO-18**. These measures would reduce significant noise impacts and vegetation disturbance during the nesting season.

Potentially significant direct impacts on Crotch's bumble bee (**Impact BIO-8**) would be reduced to less than significant through implementation of **MM-BIO-15**, which would require pre-construction surveys prior to the initiation of ground disturbance. Direct impacts on western spadefoot (**Impact BIO-9**) would be significant and would be mitigated through implementation of **MM-BIO-16**. Direct impacts to western burrowing owl (**Impact BIO-10**) would be significant and would be mitigated through implementation of **MM-BIO-17**. Potentially significant impacts on sensitive wildlife from increased abundance of domestic pets (**Impact BIO-14**) would be mitigated through implementation of **MM-BIO-18**.

Threshold 2: Would implementation of the proposed project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS?

Impact Discussion

The proposed project is primarily situated on developed land, which includes an existing golf course. The proposed project would result in direct permanent impacts on approximately 148.17 acres of land, of which 1.91 acres are classified as native or naturalized vegetation communities. Potential impacts on these communities are detailed in Table 3.3-5 through Table 3.3-10 and shown on Figure 3.3-7, Potential Impacts on Vegetation Communities.

Potential impacts on biological resources have been categorized as follows:

- **Permanent Impact – Residential:** Permanent impacts would result from the hardscape development of the proposed project's residential development.
- **Permanent Impact – Clubhouse/Hotel:** Permanent impacts would result from the proposed project's hardscape development of the hotel and hotel cottages, restaurant, event space, golf clubhouse, learning center, portions of the parking lot, the outdoor swimming pool and deck area, a patio, and a courtyard.
- **Permanent Impact – Golf Course Redesign:** Permanent impacts would result from the redesign of the golf course.

- **Permanent Impact – Fuel Modification Zone:** Areas outside of permanent impacts from site development would be subject to FMZ requirements for vegetation thinning and removal. FMZs are considered a permanent impact unless the vegetation community would either not be affected by fuel modification (i.e., nonnative grassland) or would not be subject to fuel modification due to the level of existing moisture in the community (e.g., open water, nonnative riparian).
- **Temporary Impacts – Along San Diego River (North Channel):** Impact areas include all of the natural habitat along the San Diego River (North Channel) that could be temporarily affected during construction but would later be restored in the same location. The majority of this area would only be subject to dewatering; the pond is currently an intermittent feature, drying up when water is not flowing to the area from either Sycamore Canyon or the San Diego River. As such, dewatering of this area, which would cause the pond to dry up, would have a similar impact on the existing variation in hydrology. These areas may also be subject to sediment removal from unvegetated areas; however, no sediment would be removed from freshwater marsh areas. Temporary impacts may also occur from installation of the temporary access road and bent/footing that is associated with bridge construction over the San Diego River (North Channel).
- **Temporary Impacts – Golf Course:** Temporary impacts would result from construction of the emergency access pathway in the northeastern corner of the project site. These areas are adjacent to other native habitats and would be revegetated once construction of the emergency access pathway is complete.
- **Avoidance Areas:** Direct disturbance would be fully avoided in specific areas of natural habitat.
- **Off-Site Areas:** Direct permanent impacts have the potential to occur in areas outside of the project footprint. Descriptions of off-site activities are provided in Appendix E.

Table 3.3-5. Impacts on Vegetation Communities and Land Cover Types (Acres) – City of San Diego Jurisdiction

Vegetation Community/ Land Cover Type	On-Site Impacts			Total Permanent On-Site Impacts	Permanent Off- Site Impacts	Total Impacts
	Residential	Clubhouse/ Hotel	Golf Course Redesign			
Developed ¹	—	—	—	—	1.57	1.57
Developed – Golf Course ¹	—	0.41	58.48	58.89	—	58.89
Diegan Coastal Sage Scrub – disturbed	0.08	—	—	0.08	0.11	0.19
Disturbed Habitat ¹	—	—	1.40	1.40	0.12	1.52
Eucalyptus Woodland ¹	0.10	—	—	0.10	0.02	0.12
<i>Sensitive Habitat Subtotal</i>	<i>0.08</i>	<i>—</i>	<i>—</i>	<i>0.08</i>	<i>0.11</i>	<i>0.19</i>
City of San Diego Totals	0.18	0.41	59.88	60.47	1.82	62.29

Note:¹ Non-sensitive vegetation community or land cover type.**Table 3.3-6. Permanent Impacts on Vegetation Communities and Land Cover Types (Acres) – City of Santee Jurisdiction**

Vegetation Community/ Land Cover Type	On-Site Impacts				Permanent Off-Site Impacts	Total Impacts
	Residential	Clubhouse/ Hotel	Golf Course Redesign	Fuel- Modification Zone		
Developed ¹	7.07	—	0.10	—	1.81	8.98
Developed – Golf Course ¹	20.29	6.31	42.71	—	—	69.31
Diegan Coastal Sage Scrub – disturbed	0.41	—	—	—	—	0.41
Disturbed Habitat ¹	2.14	0.19	1.77	—	—	4.10
Disturbed Wetland	0.12	—	—	—	—	0.12
Eucalyptus Woodland ¹	1.19	—	0.04	—	—	1.25
Mule Fat Scrub – disturbed	—	0.01	0.29	0.04	—	0.34
Nonnative Grassland	—	—	0.01	—	—	0.01
Nonnative Riparian	—	0.01	0.01	0.02	—	0.04
Nonnative Woodland ¹	0.15	—	0.14	0.23	—	0.52

Table 3.3-6. Permanent Impacts on Vegetation Communities and Land Cover Types (Acres) - City of Santee Jurisdiction

Vegetation Community/ Land Cover Type	On-Site Impacts				Permanent Off-Site Impacts	Total Impacts
	Residential	Clubhouse/ Hotel	Golf Course Redesign	Fuel- Modification Zone		
Southern Cottonwood-Willow Riparian Forest	0.35	—	0.10	0.05	—	0.50
Southern Cottonwood-Willow Riparian Forest – disturbed	0.02	0.20	0.06	0.02	—	0.30
<i>Sensitive Habitat Subtotal</i>	<i>0.90</i>	<i>0.22</i>	<i>0.48</i>	<i>0.13</i>	<i>—</i>	<i>1.73</i>
City of Santee Total	31.74	6.72	45.24	0.36	1.81	85.88

Notes:

¹ Non-sensitive vegetation community or land cover type.

Table 3.3-7. Temporary Impacts on Vegetation Communities and Land Cover Types - City of Santee Jurisdiction (Acres)

Vegetation Community/ Land Cover Type	Temporary Impacts Along San Diego River	Temporary Impacts Within Golf Course Access	Total Impacts
Coastal and Valley Freshwater Marsh	0.56	—	0.56
Developed – Golf Course ¹	0.26	0.01	0.27
Fresh Water	2.43	—	2.43
Mule Fat Scrub – disturbed	—	0.02	0.02
Nonnative Riparian	0.05	—	0.05
Southern Cottonwood-Willow Riparian Forest	0.01	—	0.01
Southern Cottonwood-Willow Riparian Forest – disturbed	—	0.06	0.06
<i>Sensitive Habitat Subtotal</i>	<i>0.62</i>	<i>0.08</i>	<i>0.70</i>
City of Santee Total	3.31	0.09	3.40

Notes:

¹ Non-sensitive vegetation community or land cover type.

Table 3.3-8. Summary of Impacts on Sensitive Upland Vegetation Communities (Acres)

Vegetation Community/ Land Cover Type	On-Site Impacts			Total Permanent On-Site Impacts	Permanent Off-Site Impacts	Total Impacts
	Residential	Clubhouse/ Hotel	Golf Course Redesign			
City of San Diego ¹ Jurisdiction						
Diegan Coastal Sage Scrub – disturbed	0.08	—	—	0.08	0.11	0.19
City of San Diego Subtotal	0.08	—	—	0.08	0.11	0.19
City of Santee Jurisdiction						
Diegan Coastal Sage Scrub – disturbed	0.41	—	—	0.41	—	0.41
Nonnative Grassland	—	—	0.01	0.01	—	0.01
City of Santee Subtotal	0.41	—	0.01	0.42	—	0.42
Project Total	0.49	—	0.01	0.50	0.11	0.61

Note:¹ All impacts outside of the MHPA.**Table 3.3-9. Permanent Impacts on Wetland and Riparian Vegetation Communities – City of Santee (Acres)**

Vegetation Community/ Land Cover Type	Residential	Clubhouse/ Hotel	Golf Course Redesign	Fuel-Modification Zone	Total Permanent Impacts
Disturbed Wetland	0.12	—	—	—	0.12
Mule Fat Scrub – disturbed	—	0.01	0.29	0.04	0.34
Nonnative Riparian	—	0.01	0.01	0.02	0.04
Southern Cottonwood–Willow Riparian Forest	0.35	—	0.10	0.05	0.50
Southern Cottonwood–Willow Riparian Forest – disturbed	0.02	0.20	0.06	0.02	0.30
Project Total	0.49	0.22	0.46	0.13	1.30

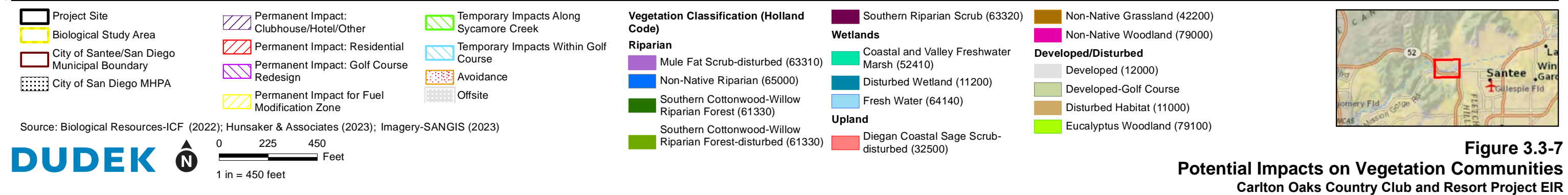
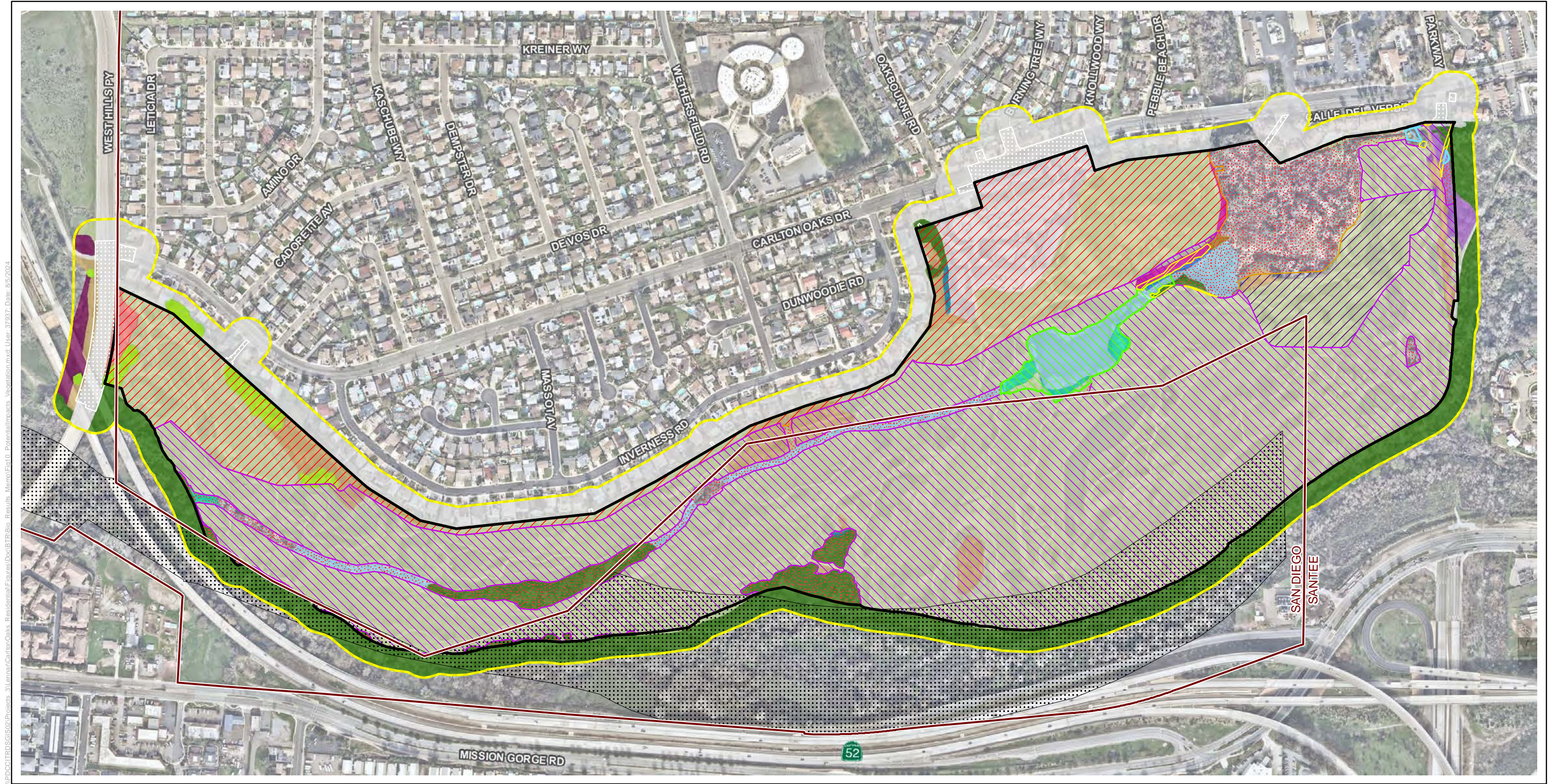
Note: No wetland impacts would occur in the City of San Diego.

Table 3.3-10. Temporary Impacts on Wetland and Riparian Vegetation Communities - City of Santee (Acres)

Vegetation Community/ Land Cover Type	Temporary Impacts along San Diego River	Temporary Impacts within Golf Course Access	Total Temporary Impacts
Coastal and Valley Freshwater Marsh	0.56	—	0.56
Fresh Water	2.43	—	2.43
Mule Fat Scrub - disturbed	—	0.02	0.02
Nonnative Riparian	0.05	—	0.05
Southern Cottonwood-Willow Riparian Forest	0.01	—	0.01
Southern Cottonwood-Willow Riparian Forest - disturbed	—	0.06	0.06
Project Total	3.05	0.08	3.13

Note: No wetland impacts would occur in the City of San Diego.

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As shown in Table 3.3-8, a total of 0.61 acres of Diegan coastal sage scrub – disturbed was identified in the BSA; 0.19 acres is present within the City of San Diego, and 0.42 acres is present within the City of Santee. Diegan coastal sage scrub is a sensitive upland vegetation community that the Biology Guidelines identify as a Tier II sensitive upland habitat (City of San Diego 2018).

Areas mapped as Diegan coastal sage scrub – disturbed on the project site consist of dry, open plantings on the shoulder and embankment of West Hills Parkway. Broom baccharis (*Baccharis sarothroides*) was the dominant plant species observed during project surveys, with associated species, such as California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), and invasive nonnative weeds, also present adjacent to the broom baccharis. This habitat is isolated between the existing golf course and West Hills Parkway. Focused surveys were conducted within this habitat for California gnatcatcher in 2019 and 2022 but did not detect species' occupancy of the area.

Within the City of San Diego, direct permanent on-site impacts on 0.08 acres of Diegan coastal sage scrub – disturbed and direct permanent off-site impacts on 0.11 acres of Diegan coastal sage scrub – disturbed would occur and would represent a significant impact on a sensitive natural community (**Impact BIO-1**). In addition, as shown in Table 3.3-6 and Table 3.3-7, direct permanent and temporary impacts on sensitive natural or naturalized vegetation communities, including Diegan coastal sage scrub – disturbed, within the City of Santee would represent a significant impact on sensitive natural and riparian communities (**Impact BIO-2** and **Impact BIO-3**). No sensitive vegetation communities would be affected within the City of San Diego MHPA.

As discussed previously, the proposed project also has the potential to result in various permanent and temporary indirect impacts from project construction activities, which would result in indirect impacts on surrounding sensitive biological resources, such as the introduction of invasive plants and changes in water quality.

Invasive exotic (i.e., nonnative) plant species have the potential to spread into adjacent habitat if planted as part of the ornamental landscaping of new development, including plantings for new residences. Weeds can be introduced through the increased movement of people or domestic animals along native areas and from construction vehicles brought onto the site. However, because the vegetation palette of the proposed project does not include invasive plant species, and no invasive plant species would be planted in or adjacent to the MHPA, the proposed project would not install invasive plant species that could indirectly affect natural vegetation communities. During golf course redesign, the proposed project also would remove existing ornamental trees that are considered invasive, such as Brazilian peppertree (*Schinus terebinthifolia*). As such, project design features would ensure that there would be no significant indirect impacts from invasive plants.

Water runoff from urban development has the potential to temporarily and permanently affect local water quality and the ecological systems associated with riparian and wetland vegetation communities. The development of the country club and resort is required by state law to comply with current regulations promulgated by the RWQCB for water quality. Implementation of project design features, such as proprietary water-quality systems, are expected to prevent a permanent indirect impact on local water quality. However, water and sediment runoff during construction of the proposed project have the potential to result in temporary indirect impacts on sensitive wetland vegetation communities, which would be a significant impact (**Impact BIO-15**).

Dust resulting from heavy-equipment grading on the project site may also have the potential to settle on nearby vegetation and interfere with the photosynthetic process of native vegetation, which could result in a significant impact to a sensitive natural community (**Impact BIO-16**).

Impact Determination

Implementation of the proposed project would have a substantial adverse effect, either directly or through habitat modifications, on riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. Potentially significant impact(s) include those described below.

Impact BIO-1. Diegan Coastal Sage Scrub (City of San Diego).

Within the City of San Diego, direct permanent on-site impacts outside of the HMPA on 0.08 acres of Diegan coastal sage scrub – disturbed and direct permanent off-site impacts on 0.11 acres of Diegan coastal sage scrub – disturbed, as shown in Table 3.3-5, would represent a significant adverse effect on sensitive natural communities.

Impact BIO-2. Permanent Impacts on Sensitive Communities (City of Santee).

Direct permanent impacts on sensitive natural or naturalized vegetation communities within the City of Santee, as shown in Table 3.3-6, would represent a significant adverse effect on sensitive natural and riparian communities.

Impact BIO-3. Temporary Impacts on Sensitive Communities (City of Santee).

Direct temporary impacts on sensitive natural or naturalized vegetation communities within the City of Santee, as shown in Table 3.3-7, would represent a significant adverse effect on sensitive natural and riparian communities.

Impact BIO-15. Water Quality.

Water and sediment runoff from construction areas has the potential to temporarily affect local water quality, and sediment deposition can negatively affect wetland vegetation communities. Erosion of sediments during rain events during construction could deposit into waterways or wetlands and negatively affect the hydrology and associated ecology of the system. Temporary indirect impacts on sensitive wetland vegetation communities would be considered a significant impact.

Impact BIO-16. Fugitive Dust.

Dust resulting from heavy equipment grading the project could settle on nearby vegetation and interfere with the photosynthetic process of native vegetation, which could result in a significant impact on sensitive vegetation communities.

Mitigation Measures

Proposed habitat mitigation ratios and corresponding required mitigation acreages for impacts on sensitive upland vegetation communities are presented in Table 3.3-11, and permanent impacts on wetland and riparian vegetation are presented in Table 3.3-12. Mitigation ratios are based on the City of San Diego's Biological Guidelines (2018) and the 2018 Wildlife Agency Draft Santee MSCP Subarea Plan. Proposed habitat mitigation ratios and corresponding acreages for temporary impacts on sensitive vegetation communities (San Diego River [North Channel] and Golf Course Emergency Access Road Area) are presented in Table 3.3-13 and Table 3.3-14.

Table 3.3-11. Proposed Mitigation for Impacts on Sensitive Upland Vegetation Communities – Cities of San Diego and Santee

Vegetation Community/ Land Cover Type	Total Impact (Acres)	Mitigation Ratio	Total Mitigation Required (Acres)
City of San Diego			
Diegan Coastal Sage Scrub – disturbed ¹ Permanent On-Site Impact	0.08	1:1	0.08
Diegan Coastal Sage Scrub – disturbed ¹ Permanent Off-Site Impact	0.11	1:1	0.11
<i>City of San Diego Subtotal</i>	<i>0.19</i>	—	<i>0.19</i>
City of Santee			
Diegan Coastal Sage Scrub – disturbed Permanent Impact	0.41	1:1	0.41
Nonnative Grassland Permanent Impact	0.01	1:1	0.01
<i>City of Santee Subtotal</i>	<i>0.42</i>	—	<i>0.42</i>
Project Total	0.61	—	0.61

Note:

¹ MSCP Tier II; impacts outside MHPA, mitigation within MHPA through City of San Diego Habitat Acquisition Fund.

Table 3.3-12. Proposed Mitigation for Permanent Impacts on Wetland and Riparian Vegetation Communities – City of Santee

Vegetation Community/ Land Cover Type	Total Permanent Impact (Acres)	Mitigation Ratio	Total Mitigation Required (Acres)
Disturbed Wetland	0.12	2:1	0.24
Mule Fat Scrub – disturbed	0.34	3:1	1.02
Nonnative Riparian	0.04	2:1	0.08
Southern Cottonwood–Willow Riparian Forest	0.50	3:1	1.50
Southern Cottonwood–Willow Riparian Forest – disturbed	0.30	3:1	0.90
Project Total	1.30	—	3.74

Note: No impacts would occur on wetland or riparian habitat within the City of San Diego.

Temporary impacts along the San Diego River (North Channel), within the mainstem of Sycamore Creek, that have the potential to occur as a result of dewatering the golf course pond during bridge construction are presented in Table 3.3-13. All 1:1 mitigation would occur in situ, through the re-establishment of the preexisting channel bottom and removal of the dewatering weirs to allow for the passive re-establishment of open water, riparian, and marsh habitat. Temporary impacts within the Golf Course Emergency Access Road Area, mitigation ratios, and corresponding acreages for temporary impacts on vegetation communities are presented in Table 3.3-14.

Table 3.3-13. Proposed Mitigation for Temporary Impacts Along San Diego River (North Channel) - City of Santee

Vegetation Community/ Land Cover Type	Total Temporary Impact (Acres)	Mitigation Ratio	Total Mitigation Required (Acres)
Coastal and Valley Freshwater Marsh	0.56	1:1 ¹	0.56 in situ
Fresh Water (Open Water)	2.43	1:1	2.43 in situ
Nonnative Riparian	0.05	1:1	0.05 in situ
Southern Cottonwood-Willow Riparian Forest	0.01	2:1	0.01 in situ + 0.01 enhancement
Project Totals²	3.05	N/A	3.05 in situ + 0.01 enhancement

Notes: No impacts would occur on wetland or riparian habitat within the City of San Diego.

¹ 1:1 mitigation for temporary impacts through rewatering of dewatered habitat at original location.

² Totals may not sum precisely due to rounding.

Table 3.3-14. Proposed Mitigation for Temporary Impacts Within Golf Course Emergency Access Road Area - City of Santee

Vegetation Community/ Land Cover Type	Total Temporary Impact (Acres)	Mitigation Ratio	Total Mitigation Required (Acres)
Mule Fat Scrub – disturbed	0.02	2:1	0.02 in situ + 0.02 enhancement
Southern Cottonwood-Willow Riparian Forest – disturbed	0.06	3:1	0.06 in situ + 0.12 enhancement
Project Totals¹	0.08	N/A	0.08 in situ + 0.14 enhancement

Note: No impacts would occur on wetland or riparian habitat within the City of San Diego.

¹ Totals may not sum precisely due to rounding.

MM-BIO-9 and **MM-BIO-10** have been identified to reduce potential impacts from fugitive dust (**Impact BIO-16**) to a less-than-significant level. In addition, potential impacts from changes in water quality (**Impact BIO-15**) on sensitive wetland vegetation communities would be reduced to a less-than-significant level with implementation of **MM-BIO-9**.

The Habitat Acquisition Fund (HAF) is codified in the City of San Diego's Municipal Code in the Development Regulations for Sensitive Biological Resources (Section 143.0141 (a)(1)(C)) and in the City's Biology Guidelines (Section III[B][1][c][4]). Payment into the HAF consistent with the San Diego Subarea Plan mitigation ratios (**MM-BIO-1**) would reduce the significance of impacts on sensitive vegetation within City of San Diego (**Impact BIO-1**) to below a level of significance. Implementation of restoration and preservation of habitat would reduce the significance of impacts on sensitive vegetation within the City of Santee (**Impact BIO-2** and **Impact BIO-3**) to below a level of significance. Any of the options for upland mitigation presented in **MM-BIO-2** would fully mitigate impacts on sensitive upland vegetation within the City of Santee.

Impact BIO-1 is proposed to be mitigated through the City of San Diego's Habitat Acquisition Fund, for the 0.19 acres of impacts. This would be appropriate because of the small size of the habitat patch, the low quality and isolation, and the lack of occupancy by sensitive species.

MM-BIO-1. Mitigate Temporary and Permanent Impacts Within City of San Diego on Sensitive Upland Vegetation Communities. Direct permanent impacts on 0.08 acres of disturbed Diegan coastal sage scrub (outside of MHPA) and direct temporary off-site impacts on 0.11 acres of disturbed Diegan coastal sage scrub (outside of Multi-Habitat Planning Area), 0.19 acres total within the City of San Diego shall be mitigated at a 1:1 ratio in accordance with the Upland Mitigation Ratios provided in the City of San Diego Biological Guidelines (as specified in Table 3 of the Biological Guidelines). Prior to beginning any ground-disturbing activities or being issued grading permits by the City of San Diego, the applicant shall provide a contribution into the City of San Diego Habitat Acquisition Fund (HAF). The HAF fee calculated shall be based on the current market rate amount per acre set by Real Estate Assets Department (READ) each year at the trigger time. Per the City of San Diego Municipal Code, an additional 10% administration fee is required to be paid for City of San Diego HAF staff administration and maintenance costs. The 10% fee is calculated and applied after the mitigation HAF amount is determined based upon the required mitigation acreage/ratio. Documentation of this contribution shall be provided to the City of San Diego by the applicant prior to the issuance of any construction permit.

MM-BIO-2. Mitigate Permanent Impacts Within City of Santee on Sensitive Upland Vegetation Communities. Direct permanent impacts on disturbed Diegan coastal sage scrub and nonnative grassland within the City of Santee shall be mitigated at a 1:1 ratio either through the purchase of mitigation bank credits of Diegan coastal sage scrub (Option 1) or through off-site preservation or on-site creation and preservation of Diegan coastal sage scrub (Option 2).

- 1 **Option 1:** The purchase of mitigation credits shall occur at a mitigation bank approved by the California Department of Fish and Wildlife (CDFW) in the local area or other location deemed acceptable by CDFW. The applicant shall provide evidence of purchase of credits to the City of Santee prior to being issued grading permits by the City of Santee. *Evidence of purchase* shall consist of the following items:
 - A A copy of the purchase contract referencing the project name and numbers for which the habitat credits were purchased.
 - B If not stated explicitly in the purchase contract, a separate letter must be provided identifying the entity responsible for the long-term management and monitoring of the preserved land.
 - C To ensure that the land shall be protected in perpetuity, evidence must be provided that a dedicated conservation easement or similar land constraint has been placed over the mitigation land.
 - D An accounting of the status of the mitigation bank shall be provided and include the total amount of credits available at the bank, the amount required by this project, and the amount remaining after use by this project.
- 2 **Option 2:** If habitat credit cannot be purchased in a mitigation bank, then the applicant shall provide for the off-site preservation or on-site creation and preservation of Diegan coastal sage scrub habitat at a 1:1 ratio, as described below, prior being issued grading permits by the City of Santee.
 - A **Off-Site Preservation:** The applicant shall provide for the off-site preservation of land that meets criteria for sensitive upland vegetation community mitigation through the recordation of a conservation easement at a location approved by the City of Santee and

the Wildlife Agencies (U.S. Fish and Wildlife Service and CDFW) that will be managed in perpetuity under a Resource Management Plan (RMP) that establishes long-term monitoring, maintenance, management, and reporting directives. The RMP will be prepared as described in **MM-BIO-6**. Off-site mitigation shall occur within one of the following areas: (1) preserve areas in the City of Santee; (2) City of San Diego Multi-Habitat Planning Area; or (3) County of San Diego Pre-Approved Mitigation Areas. The off-site land being preserved must be at a location approved by the City of Santee and the Wildlife Agencies. Long-term management shall be funded through a non-wasting endowment in an amount determined through preparation of a Property Assessment Record or similar method for determining funding amount. The Conservation Easement shall be owned by a conservancy, or other similar, experienced entity, subject to approval by CDFW, and CDFW shall be listed as a third-party beneficiary.

- B On-Site Restoration and Preservation.** Diegan coastal sage scrub shall be restored and preserved on site at a 1:1 ratio through the recordation of a conservation easement at a location approved by the City of Santee, granted to an entity approved by the City of Santee, and restored pursuant to an Upland Restoration Plan described below. The Conservation Easement shall be owned by a conservancy, or other similar, experienced entity subject to approval by CDFW, and CDFW shall be listed as a third-party beneficiary. The Upland Restoration Plan shall include the following:
- i. Monitoring of the restoration areas will occur for a minimum of 5 years or until the fifth-year performance/success criteria are met to determine the successful completion of the 5-year mitigation and monitoring program. The performance standards and success criteria must be approved by the City of Santee and CDFW and shall include requirements for 100% survival of native shrub container-stock plantings at the first annual monitoring (or sufficient number of shrubs emerging from seed to replace the container stock), as well as Year 5 standards of native vegetation cover of at least 90% of that of a nearby Diegan coastal sage scrub reference site. Methods used to measure these performance standards shall be described, and, if the restored areas fail to meet the Year 5 standards after the full monitoring term, then a specific set of remedial measures will be developed and implemented, and the monitoring and maintenance period would be extended until all Year 5 standards are met, or as otherwise provided in this document. The Upland Restoration Plan must be approved City of Santee and CDFW prior to implementation.
 - ii. In the absence of any restoration plan guidance from the City of Santee, the City of San Diego's *General Outline for Conceptual Revegetation/Restoration Plans* shall be used for guidance.
 - iii. The Upland Restoration Plan shall detail the installation, maintenance, and monitoring which would occur as part of the restoration effort.
 - iv. The Upland Restoration Plan shall include an evaluation of restoration suitability specific to proposed vegetation types, soil preparation, plant palettes, irrigation, erosion control, maintenance and monitoring program, and success criteria.
 - v. The applicant shall also secure performance bonds prior to being issued grading permits by the City of Santee. These bonds would be released after the City of Santee approves the final success of the restoration site. The specifics regarding long-term

management and management funding will be included in a Resource Management Plan (RMP) that establishes long-term monitoring, maintenance, management, and reporting directives. The final RMP shall be prepared as described in **MM-BIO-6**. The RMP cannot be approved by the City of Santee or CDFW until the following has been completed: easements shall be dedicated, a qualified Resource Manager approved by the City shall be selected, and the RMP funding mechanism shall be in place.

MM-BIO-3. Mitigate Permanent and Certain Temporary Impacts Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities. Impacts on sensitive riparian and wetland vegetation communities shall be mitigated through on-site restoration, enhancement, and preservation of habitat. The impacts to sensitive riparian and wetland vegetation shall be mitigated at the mitigation ratios described below:

- 1 **Direct permanent impacts on disturbed wetland** shall be mitigated at a 2:1 ratio through preservation of enhanced or restored native wetland habitat.
- 2 **Direct permanent impacts on mule fat – disturbed** shall be mitigated at a 3:1 ratio through preservation of enhanced or restored riparian scrub habitat (mule fat and/or willow scrub).
- 3 **Direct permanent impacts on southern cottonwood–willow riparian forest and southern cottonwood–willow riparian forest – disturbed** shall be mitigated at a 3:1 ratio through preservation of enhanced or restored riparian forest habitat.
- 4 **Direct temporary impacts on nonnative riparian communities** shall be mitigated at a 1:1 ratio through preservation of enhanced or restored riparian or wetland habitat.
- 5 **Direct temporary impacts on southern cottonwood–willow riparian forest (including disturbed)** shall be mitigated at a 3:1 ratio through in situ re-establishment of riparian forest and preservation of enhanced or restored riparian forest.
- 6 **Direct temporary impacts on mule fat scrub** shall be mitigated at a 2:1 ratio through in-situ re-establishment of mule-fat scrub and enhancement of riparian scrub habitat.

The monitoring and restoration requirements for these sensitive riparian and wetland vegetation communities shall be identified in a Habitat Mitigation and Monitoring Plan (HMMP) (refer to **MM-BIO-5**) and Resource Management Plan (RMP) (**MM-BIO-6**). The HMMP must be approved by the resource agencies (U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife [CDFW]), and the RMP must be approved by the Wildlife Agencies (U.S. Fish and Wildlife Service and CDFW) prior to issuance of grading permits by the City of Santee.

MM-BIO-4. Mitigate Temporary Dewatering Impacts on Sensitive Riparian and Wetland Vegetation Communities Within the City of Santee. Riparian and wetland vegetation communities within the City of Santee are considered sensitive by California Department of Fish and Wildlife. Direct temporary impacts on coastal valley freshwater marsh, fresh water, and nonnative riparian vegetation shall be mitigated through passive, in situ restoration of habitat to pre-dewatering conditions. The impacts shall be mitigated through implementation of the Habitat Mitigation and Monitoring Plan (refer to **MM-BIO-5**).

MM-BIO-5. Habitat Mitigation and Monitoring Plan (HMMP). To implement the restoration and enhancement of sensitive riparian and wetland vegetation communities as mitigation for loss of, or temporary impact on, those communities within the project site, as described in **MM-BIO-3** and **MM-BIO-4**, a

final HMMP must be approved by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and the City of Santee prior to being issued grading permits by the City of Santee. The HMMP shall do the following:

- The draft HMMP (Appendix K of the Biological Survey Report) shall be used as a basis for the final HMMP. The HMMP shall include details for the installation, maintenance, and monitoring of sensitive riparian and wetland vegetation that would occur after approval of the HHMP.
- Monitoring shall include monitoring of the restoration/ enhancement areas for a minimum of 5 years or until fifth-year performance/success criteria are met. The HHMP shall include performance standards to determine the successful completion of the 5-year mitigation and monitoring program. Attainment of these standards shall indicate the restoration area is progressing toward the habitat functions and services specified in the HHMP. Methods used to measure these performance standards shall be described and if the restored area fails to meet the Year 5 standards after the full monitoring term, a specific set of remedial measures shall be developed, implemented, and the monitoring and maintenance period would be extended until all Year 5 standards are met or as otherwise provided in the HMMP.
- The HMMP shall include performance bonds that would be released after the City of Santee approves the final success of the restoration site.

MM-BIO-6. **Resource Management Plan (RMP).** To provide for the long-term management of the mitigation sites (i.e., on-site wetland mitigation sites and potential Diegan coastal sage preservation sites), an RMP shall be prepared by a qualified biologist to address long-term monitoring, maintenance, management, and reporting directives, in perpetuity. The RMP shall be approved by the City of Santee and the Wildlife Agencies (U.S. Fish and Wildlife Service and California Department of Fish and Wildlife [CDFW]) and implemented prior to any ground disturbance activities or issuance of grading permits by the City of Santee. The RMP shall include the following:

- Delineation of the limits of where the conservation easement will be recorded.
- Selection of a qualified Preserve Manager approved by the City of Santee and Wildlife Agencies.
- Requirements of long-term monitoring, maintenance, management, and reporting directives, in-perpetuity, approved by the City of Santee and Wildlife Agencies, that will be managed by the Preserve Manager.
- Monitoring requirements for the mitigation area for a minimum of 5 years or until fifth-year performance/success criteria are met.
- Draft performance standards to determine the successful completion of the 5-year mitigation and monitoring program. Attainment of these standards shall indicate that the restoration area is progressing toward the habitat functions and services specified in the RMP. Methods used to measure these performance standards will be described, and, if the restored area fail to meet the Year 5 standards after the full monitoring term, then a specific set of remedial measures will be developed and implemented, and the monitoring and maintenance period will be extended until all Year 5 standards are met, or as otherwise provided in the RMP.
- Preparation of a Property Analysis Record prepared for endowment funding or similar cost estimation, to determine the size of a non-wasting endowment necessary to fund the annual costs for basic stewardship of the preserve.

- Identification of what entity would hold the endowment (or equivalent acceptable funding mechanism).

The final RMP document must include the additional following items:

- Evidence of purchase of the mitigation land to be managed.
- Evidence that a conservation easement has been dedicated to CDFW, or other entity approved by CDFW to ensure that the land is protected in perpetuity.
- Acknowledgment that the resource manager accepts the responsibility for the management of the site.
- Establishment of an endowment or equivalent acceptable funding mechanism.
- Acknowledgment that the City of Santee has approved the entity that will be responsible for holding the endowment.

MM-BIO-7. Qualified Biologist to Provide Construction Monitoring. A qualified biologist shall be responsible for overseeing compliance with all laws, regulations, permit conditions, mitigation measures, and any other biological-resources requirements during project construction. Prior to the start of construction, a qualified biologist shall conduct environmental awareness training for all construction personnel. Topics to be included in the training include, but are not limited to, the construction limits, sensitive habitats, features, plants, and animal species to avoid, mitigation measure and/or permit condition requirements, seasonal or other time-related restrictions on construction, and measures related to erosion control and spill prevention. Environmental awareness training shall be repeated for any new construction personnel working on the site. The qualified biologist shall have, at a minimum, a bachelor's degree in biology, ecology, zoology, or a related field of science, and at least 2 years of field experience.

MM-BIO-8. Delineate Environmentally Sensitive Areas. Sensitive vegetation communities, jurisdictional waters and wetlands, and other sensitive biological resources located outside of permanent and temporary impact areas shall be identified on the final construction plans as *environmentally sensitive areas* and protected with temporary fencing (e.g., orange snow fencing). A qualified biologist shall monitor the installation of the temporary fencing and ensure that it is installed prior to the start of clearing, brushing, grading, or other ground-disturbing construction activities. A qualified biologist shall inspect the temporary fencing at least twice weekly during grading and monthly after grading is complete, ensuring that it remains in place throughout construction.

MM-BIO-9. Stormwater Pollution Prevention Plan. To control erosion and sedimentation and to preserve water quality, the applicant will obtain coverage for the project under the Construction General Permit (Order No. 2022-0057-DWQ). Prior to the issuance of grading permits, the applicant shall prepare a Stormwater Pollution Prevention Plan (SWPPP) to reduce the potential for water pollution and sedimentation from construction. Best management practices (BMPs) to be included in the SWPPP that must be submitted to the State Water Resources Quality Control Board shall include, but are not limited to, the following:

- 1 The applicant shall not stockpile brush, loose soils, excavation spoils, or other similar debris material within sensitive habitats.

- 2 If visible dust is present during construction activities, then standard dust-suppression techniques (e.g., water spraying) shall be used in all ground-disturbance areas.
- 3 During construction activities, measures shall be in place to ensure that contaminants are not discharged from construction sites. The SWPPP will define areas where hazardous materials and trash would be stored, vehicles would be parked, fueled, and serviced, and construction materials would be stored.
- 4 Runoff, sedimentation, and erosion shall be minimized through the use of BMPs, such as water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures shall be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water, and preserve roadways and adjacent properties.
- 5 Equipment storage, fueling, and staging areas shall be located in upland sites, away from riparian areas and other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside of those previously specified, these maintenance activities will be performed at least 150 feet from all aquatic resources, or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project-related spills of hazardous materials shall be cleaned up immediately, and contaminated soils removed to approved disposal areas.
- 6 Measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment shall be implemented to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system.
- 7 Measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills shall be implemented immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems.

The applicant shall comply with the City of Santee's Stormwater Pollution Prevention Program, the specifics of which can be found on the City of Santee's website. Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the City of Santee at least 30 days prior to start of construction. Updated SWPPPs will be provided to the City of Santee on request during construction.

MM-BIO-10. Speed Limits During Construction. The City of Santee shall require that vehicle speed limits within the project site will not exceed 25 miles per hour during project construction.

Level of Significance After Mitigation

Potential impacts on sensitive vegetation communities within the City of San Diego (**Impact BIO-1**) would be avoided and minimized with implementation of **MM-BIO-7 through MM-BIO-10** and reduced to a less-than-significant level with implementation of **MM-BIO-1**.

Potential permanent impacts on sensitive upland vegetation communities within City of Santee (**Impact BIO-2**) would be avoided and minimized with implementation of **MM-BIO-5 through MM-BIO-10** and reduced to a less-than-significant level with implementation of **MM-BIO-2** and **MM-BIO-3**.

Potential direct temporary impacts on riparian upland vegetation communities within City of Santee (**Impact BIO-3**) would be avoided and minimized with implementation of **MM-BIO-7 through MM-BIO-10** and reduced to a less-than-significant level with implementation of **MM-BIO-3 through MM-BIO-6**.

In addition, potential impacts from fugitive dust (**Impact BIO-16**) on sensitive vegetation communities would be reduced to a less-than-significant level with implementation of **MM-BIO-9** and **MM-BIO-10**. Potential impacts from changes in water quality (**Impact BIO-15**) on sensitive vegetation would be reduced to a less-than-significant level with implementation of **MM-BIO-9**.

Threshold 3: Would implementation of the proposed project have a substantial adverse effect on federally or state-protected wetlands (including, but not limited to, marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means?

Threshold 3 (City of San Diego): Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact Thresholds

In accordance with the City of San Diego's Significance Determination Thresholds, the project would have a significant impact if it would:

- Result in substantial adverse impacts on wetlands through direct removal, filling, hydrological interruption, or other means.

Impact Discussion

The information in this section is based on the Jurisdictional Delineation prepared for the proposed project, which is included in the Biological Survey Report (Appendix E). Any references to and analysis of non-wetland waters are provided only for informational purposes because the CEQA Appendix G thresholds do not protect non-wetland waters.

The project has been designed to avoid direct impacts on waterways, except for linear stream crossings (primarily improvements of the existing river crossing at the northeastern side of the project site [NWW5]) and localized, temporary, summer stream dewatering associated with construction (allowing for access for bridge construction). Areas of riparian vegetation less than 100 feet from buildings will be considered affected by fuel management zones and mitigated; no impacts will occur to the channel topography in these fuel management zones, so there will not be a negative effect on water channel function. All other buildings, including all residential buildings, are positioned at least 100 feet back from riparian habitat, providing buffers for wetlands. All stream courses within the redeveloped golf course would include a 10-foot-wide strip of planted native vegetation. This strip will have an emphasis on saltgrass (*Distichlis spicata*), a native, wetland tolerant grass species. There is currently no buffer between the existing golf course and existing waterways.

The project would not result in permanent negative development of jurisdictional waterways relative to flood conveyance (i.e., no direct alteration of stream elevation); improvements at NWW5 would improve water conveyance at that location. The hydrology section of this EIR states that the project would not (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 that 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.

The *Drainage Report for Carlton Oaks Country Club & Resort TM 2019-1/DR 2019-5* (Appendix J) states that “there would be a substantial lag time between the time the peak flows from the proposed development outlet to the San Diego River and time the peak flows along the San Diego River reach the proposed outlet locations since the tributary area to the San Diego River is several thousand acres. Due to this lag time, there is no net increase of flows to the San Diego River from the development of Carlton Oaks Country Club and Resort when compared to existing conditions.”

Regarding the driving range, soil was placed within the driving range in 2023–2024. There is an existing silt fence along the chain-link fence on the outer boundary of the driving range, where it abuts Sycamore Canyon Creek. The silt fence was in good condition in 2024 and would have prevented any sediment from entering the adjacent waterway. Soil was removed in 2024, and the site was returned to original conditions prior to soil deposition. No impacts occurred on Sycamore Canyon Creek from activities at the driving range.

U.S. Army Corps of Engineers/Regional Water Quality Control Board Jurisdictional Wetlands

The proposed project would have no impact (temporary or permanent) on USACE/RWQCB jurisdictional wetlands; wetlands WW1 and WW2 are within designated Avoidance Areas and would not be affected by the proposed project (Figure 3.3-8, Potential Impacts on Jurisdictional Waters and Wetlands).

The proposed project would result in the direct permanent loss of 0.289 acres of USACE/RWQCB jurisdictional non-wetland waters, as well as permanent impacts on 0.575 acres of USACE/RWQCB jurisdictional non-wetland waters (Table 3.3-15; Figure 3.3-8). The proposed project would also result in direct temporary impacts on 2.373 acres of USACE/RWQCB non-wetland waters, including 2.339 acres of temporary impacts associated with the dewatering of a pond in the San Diego River (North Channel) (NWW1) during construction (Table 3.3-16; Figure 3.3-8). The remainder of the temporary impacts at NWW5 would occur around improvements to the emergency exit pathway in the northeastern corner of the project site.

Table 3.3-15. Permanent Impacts on U.S. Army Corps of Engineers/Regional Water Quality Control Board Jurisdictional Waters (Acres)

Aquatic Resource	Permanent Impact ¹	Permanent Loss ²
Clubhouse/Hotel		
NWW1	0.570	0.000
Residential		
NWW2	0.000	0.235
NWW3	0.000	0.003
Golf Course Redesign		
NWW1	0.000	0.000

Table 3.3-15. Permanent Impacts on U.S. Army Corps of Engineers/Regional Water Quality Control Board Jurisdictional Waters (Acres)

Aquatic Resource	Permanent Impact ¹	Permanent Loss ²
NWW5	0.000	0.051
Fuel Modification Zone		
NWW5	0.005	0.000
Total	0.575	0.289

Notes: NWW = non-wetland waters.

¹ A *permanent impact to an aquatic feature* is defined as a permanent discharge of fill material (e.g., riprap), but one that allows the feature to retain some aquatic function.

² A *permanent loss* was designated to an aquatic feature where it would be converted to concrete or uplands, thereby eliminating any aquatic function and creating no impacts on wetland waters.

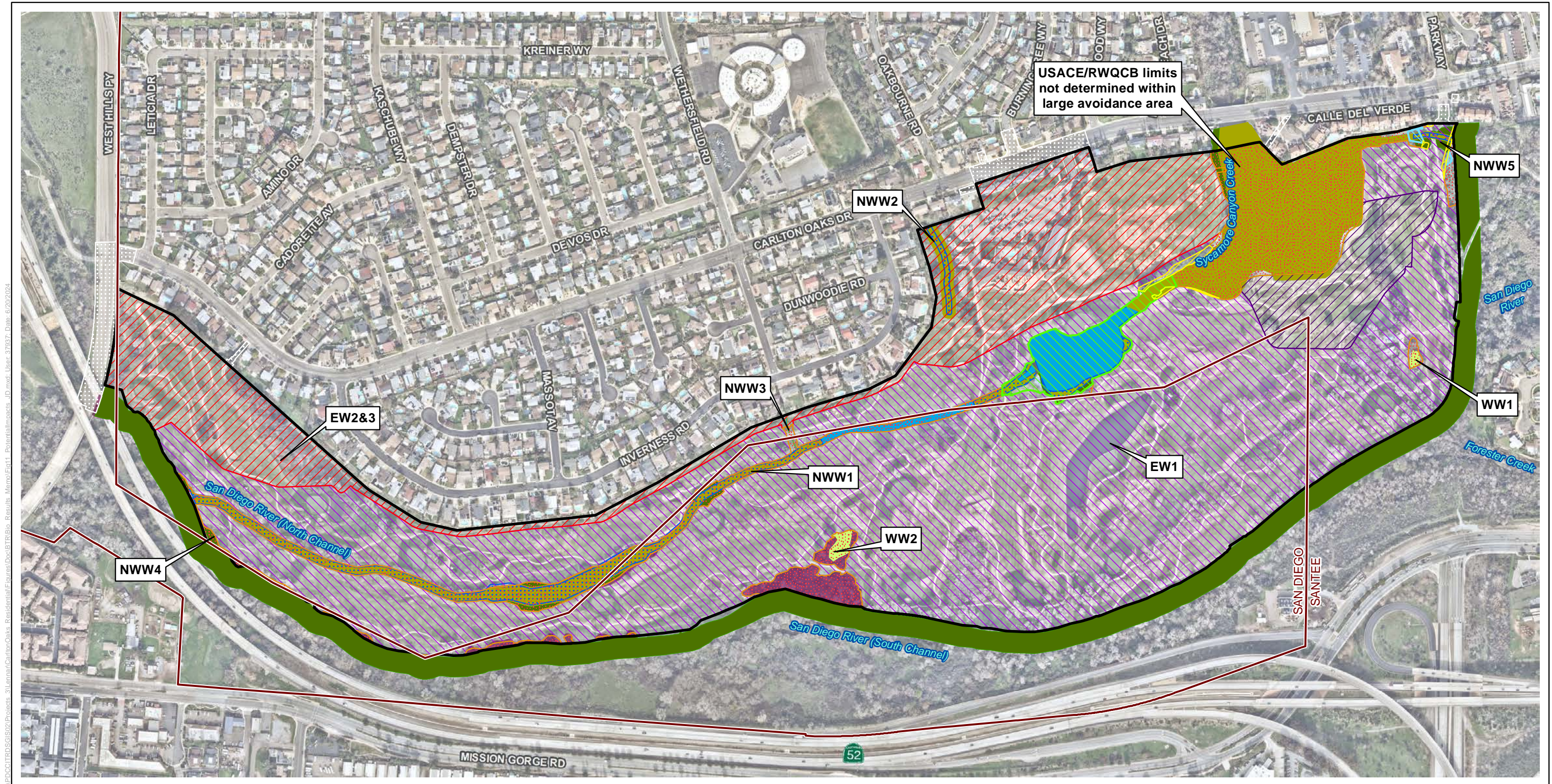
Table 3.3-16. Temporary Impacts on U.S. Army Corps of Engineers/Regional Water Quality Control Board Jurisdictional Waters (Acres)

Aquatic Resource	Temporary Impact
Golf Course Redesign	
NWW5	0.010
Temporary Impacts Along San Diego River (North Channel)	
NWW1	2.339
Temporary Impacts Within Golf Course Access	
NWW5	0.024
Total	2.373

Notes: NWW = non-wetland waters.

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Source: Jurisdictional Resources-ICF (2022); Hunsaker & Associates (2023); Imagery-SANGIS (2023)



Figure 3.3-8
Potential Impacts on Jurisdictional Waters and Wetlands
Carlton Oaks Country Club and Resort Project EIR

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CDFW Jurisdictional Wetlands

The proposed project would have permanent direct impacts on up to 0.929 acres of CDFW-jurisdictional vegetated streambed and 0.148 acres of CDFW jurisdictional riparian habitat (Table 3.3-17; Figure 3.3-1, Vegetation Communities). The proposed project would have temporary direct impacts on up to 0.758 acres of CDFW-jurisdictional vegetated streambed, 2.355 acres of unvegetated streambed, and 0.095 acres of riparian habitat (Table 3.3-18). Impacts on the CDFW-jurisdictional resources (e.g., marsh, riparian), as detailed in Table 3.3-17 and Table 3.3-18, would result in a significant impact on state-protected wetlands (**Impact BIO-4**).

Table 3.3-17. Permanent Impacts on California Department of Fish and Wildlife Jurisdictional Resources (Acres)

Aquatic Resource	Riparian	Unvegetated Stream	Vegetated Stream
Clubhouse/Hotel			
NWW1	—	—	0.206
Residential			
NWW1	0.012	—	0.008
NWW2	—	—	0.606
NWW3	—	—	0.006
Golf Course Redesign			
NWW1	—	—	0.018
NWW5	0.101	—	0.077
Fuel Modification Zone			
NWW5	0.035	—	0.008
Total	0.148	—	0.929

Notes: NWW = non-wetland waters.

No impacts would occur on NWW4.

Table 3.3-18. Temporary Impacts on California Department of Fish and Wildlife Jurisdictional Resources (Acres)

Aquatic Resource	Riparian	Unvegetated Stream	Vegetated Stream
Golf Course Redesign			
NWW5	0.013	—	0.014
Temporary Impacts Along San Diego River (North Channel) (Dewatering)			
NWW1	0.068	2.355	0.722
Temporary Impacts Within Golf Course			
NWW5	0.014	—	0.036
Total	0.095	2.355	0.758

Note: NWW = non-wetland waters.

City of San Diego Wetlands

No impacts would occur on City of San Diego (ESL) Wetlands. Within the project site, potential City of San Diego (ESL) Wetlands are all demarcated avoidance areas and would not be affected or redeveloped (Figure 3.3-1, Vegetation Communities).

Impact Determination

Impact BIO-4. Wetland Impacts.

Impacts on wetlands (e.g., marsh, riparian), as detailed in Table 3.3-17 and Table 3.3-18, would represent a significant impact on state-protected wetlands.

Mitigation Measures

In order to comply with federal and state regulations, waterways and wetlands will be avoided to the maximum extent practicable. For unavoidable impacts on waterways or wetlands, the following permit and agreements may be required:

- **CWA Section 401/404** permit issued by the California RWQCB and the USACE for all project-related disturbances of waters of the United States and/or associated wetlands.
- **Section 1602 Streambed Alteration Agreement** issued by the CDFW for all project-related disturbances of any streambed or CDFW-jurisdictional riparian habitat.

Prior to the issuance of grading permits, impacts on state wetlands areas will be mitigated by **MM-BIO-3 through MM-BIO-11** to below a level of significance. Ultimately, the jurisdictional waters/wetland mitigation will proceed in accordance with the permit and certification requirements of described in **MM-BIO-11**, which would ensure that any additional requirements from the resource agencies are met and would ensure that there would not be a significant adverse effect on state or federal wetlands.

MM-BIO-11. Wetland Permits.

Impacts on jurisdictional wetland and waterway resources and occupied least Bell's vireo critical habitat would require permits and authorizations by the USACE, RWQCB, and CDFW prior to impacts. Prior to the approval of the grading plans, the applicant will provide the City of Santee with permits and authorizations from each resource agency, for project impacts related to aquatic resources and impacts on occupied least Bell's vireo riparian habitat, or provide evidence that no such permits are required. Impacts on sensitive wetland communities will be mitigated, at a minimum, as described in **MM-BIO-3** and **MM-BIO-4**. These resource agencies could require mitigation ratios higher than those described in **MM-BIO-3** and **MM-BIO-4**, but ratios will not be less than those described in **MM-BIO-3**.

Level of Significance After Mitigation

Direct permanent and temporary impacts on wetland vegetation communities (**Impact BIO-4**) would be reduced to a less-than-significant level through implementation of **MM-BIO-3 through MM-BIO-11**, which would require mitigation and permits from the agencies that have jurisdiction over them (i.e., USACE, RWQCB, and CDFW).

Threshold 4: Would implementation of the proposed project result in substantial interference with the movement of 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?

Threshold 4 (City of San Diego): 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, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

Impact Thresholds

In accordance with the City of San Diego's Significance Determination Thresholds, the project would have a significant impact if it would:

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites.

Impact Discussion

Wildlife Corridor

Wildlife corridors are intended to allow for genetic flow of microfauna and macrofauna at a landscape level. Currently, the project site functions as both live-in and foraging habitat for a wide variety of large and small wildlife and partial territory for larger mammals (i.e., mule deer). As discussed in Section 3.3.2.4, Habitat Connectivity and Wildlife Corridors, the BSA is situated directly adjacent to and parallel with a curve of the San Diego River and is part of the habitat connectivity that exists in this area. The San Diego River through the City of Santee is not identified in the MSCP Plan as a Habitat Linkage or in the California Essential Habitat Connectivity Project as an Essential Connectivity Area. The San Diego River (South Channel) is primarily within the City of San Diego MHPA and is considered the primary wildlife corridor for this analysis, while the golf course and the San Diego River (North Channel) are considered a secondary movement corridor (Figure 3.3-9, Wildlife Corridor Analysis).

Figure 3.3-9 presents a depiction of the existing primary and secondary wildlife movement corridor widths through the San Diego River and Carlton Oaks Golf Course, and the widths of the secondary wildlife movement corridors that would result from the proposed project. The project would have no direct development of the primary wildlife movement corridor (the San Diego River [South Channel] riparian corridor). Figure 3.3-9 depicts the proposed development boundaries of the clubhouse and hotel area, Residential North, and Residential West, as well as the approximate widths of the riparian corridor, the width of the golf course, and widths of associated development. Residential North is situated within the limits of the current clubhouse and driving range. The back of the existing driving range faces Sycamore Canyon Creek and the San Diego River (North Channel), with a 6-foot-tall chain-link fence against a ball fence, a net that varies from 15 to 30 feet tall. The existing fence is depicted on Figure 3.3-9. Because of the height of the fences, it is considered an existing barrier to wildlife movement; therefore, representative corridor width "F" terminates at the fence.

At the proposed Residential West area, the existing conditions include the San Diego River to the south, existing residential development with backyard fences to the northeast, and West Hills Parkway to the west. West Hills Parkway includes a steep slope from the golf course to a highly trafficked four-lane, with chain link fences at portions of the top and bottom. While wildlife may utilize this area for nighttime movement, any existing east-west movement

is expected to occur along the adjacent San Diego River riparian corridor. The proposed Residential West area would be tucked into this pocket between existing residential and West Hills Parkway embankment.

The primary wildlife corridor from Mission Trails toward the City of Santee constricts to approximately 459 feet as it passes under West Hills Parkway (Figure 3.3-9, Wildlife Corridor Analysis; Cross-Section A). Cross-Section B is immediately downstream of the confluence of the San Diego River (South Channel) and San Diego River (North Channel), and the width of the riparian corridor expands to 671 feet. Under the proposed development, although the “secondary” wildlife movement corridor would reduce to zero at this location (Cross-Section B), the primary wildlife movement corridor would expand to the widest extent since Mast Park to the east (Cross-Section I). Cross-Section C shows the width of the primary wildlife corridor as 258 feet as it passes under the tall SR-52 bridges, as well as the width of the secondary corridor as 349 feet (including the San Diego River [North Channel]) once the proposed development is constructed, and approximately 345 feet of development.

Cross-Sections D and E show representative widths in the existing and proposed golf course area. Although the depicted widths of the secondary corridor stop at the “Permanent: Impact Residential” line, the development in this area is a maintenance-vehicles-only road, which would not constrain wildlife movement.

From the eastern side of the site, the river corridor and associated riparian areas are nearly 1,000 feet wide within Mast Park (Cross-Section I). Moving west from there, the main channel of the San Diego River turns south and the primary corridor constricts to 142 feet at Cross-Section G before widening to 434 feet downstream of the confluence with Forester Creek (Cross-Section F). Dirt trails in Mast Park feed into the trail along the northern edge of the primary wildlife corridor (following the berm), allowing for focused wildlife movement along this trail adjacent to the shelter of the riparian corridor. The secondary wildlife corridor would remain 415 feet wide at Cross-Section G, providing a wide buffer from the clubhouse and hotel to the trail and primary wildlife movement corridor. To the north of the clubhouse and hotel (Cross-Section H), a very narrow tributary of the San Diego River passes through an existing culvert, eventually meeting up with Sycamore Canyon Creek. The area north of the clubhouse and hotel would remain as golf course (putting green and a private emergency access road), allowing secondary movement of wildlife from Mast Park to the internal avoided riparian area and the narrow Sycamore Canyon Creek channel to the north. Downstream from the proposed clubhouse and hotel, the secondary movement corridor would remain more than 1,000 feet wide, with the golf course serving as a buffer area between the primary movement corridor and the proposed development. Sycamore Canyon Creek to the north of the project, is constrained at generally less-than 200 feet wide (Cross Section J), with residential areas to the west and a chain-link fence to the east separating the creek from Santee Lakes and is constrained for approximately 1.5 miles. Because of the distance of constraint, Sycamore Canyon Creek from Santee Lakes to Carlton Oaks provides potential for limited, constrained local wildlife movement, but is not considered a wildlife corridor. The MSCP Plan and the California Essential Habitat Connectivity Project determined that the main wildlife linkage from northern Santee is through the large upland open spaces of East Elliott into Mission Trails. The proposed project would allow for local wildlife movement out of Sycamore Canyon Creek to the east through the golf course (Cross-Section H) and to the southeast along the San Diego River (South Channel) and into the golf course (Cross Section K). With the proposed project, a road would be constructed in the golf course between Residential North and the clubhouse, with a bridge over the San Diego River (North channel). The area under the bridge would vary between 5 and 12 feet, which would be tall enough to accommodate wildlife crossings within the riparian zone and would also accommodate 100-year flood flows.

Wildlife Nursery Sites

A wildlife nursery site was identified within the golf course. Trees located adjacent to the pond on the San Diego River (North Channel) serve as a rookery (i.e., breeding colony) for the native seabird double-crested cormorant.

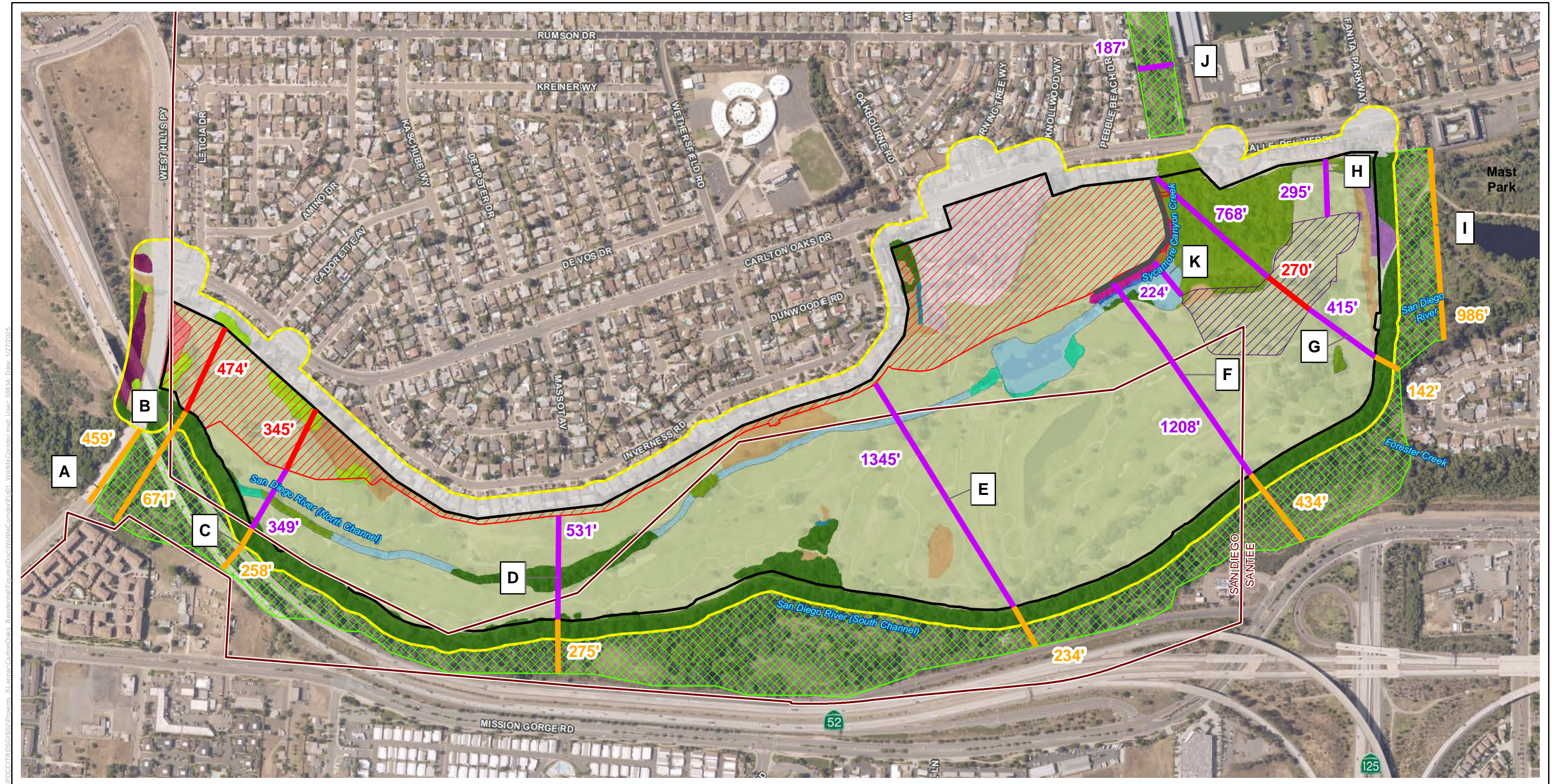
This site is one of the only known double-crested cormorant rookeries in San Diego County (Unitt 2004). Double-crested cormorant return to this site annually to raise their young; therefore, this site is considered a native wildlife nursery site. These pond-side trees would not be removed during golf course redesign grading. However, construction noise and activity associated with the regrading and redesign of the golf course and construction of the golf resort, if they were to occur during the breeding season, have the potential to disrupt the breeding activities of double-crested cormorants. Disruption or loss of breeding at this rookery would result in a significant impact on a wildlife nursery site (**Impact BIO-11**).

Impact Determination

Wildlife Corridor

The proposed project has been positioned with residential areas clustered near existing residential areas and positioned away from the primary wildlife movement corridor. The clubhouse and hotel would be situated in the secondary movement corridor with a setback from the primary movement corridor. The project would not have a significant impact on wildlife movement corridors through the San Diego River Valley.

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Legend

- Project Site
- Biological Study Area
- City of Santee/San Diego Municipal Boundary

Source: Biological Resources-ICF (2022); Hunsaker & Associates (2023); Imagery-SANGIS (2023)

Wildlife Corridor

- Primary Movement Corridor
- Secondary Movement Corridor
- Proposed Project Development in Secondary Corridor
- Existing Fence at Driving Range

Vegetation Classification (Holland Code)

Riparian

- Mule Fat Scrub-disturbed (63310)
- Non-Native Riparian (65000)
- Southern Cottonwood-Willow Riparian Forest (61330)
- Southern Cottonwood-Willow Riparian Forest-disturbed (61330)

Wetlands

- Coastal and Valley Freshwater Marsh (52410)
- Disturbed Wetland (11200)
- Fresh Water (64140)

Upland

- Diegan Coastal Sage Scrub-disturbed (32500)

Other Land Use

- Southern Riparian Scrub (63320)
- Non-Native Grassland (42200)
- Non-Native Woodland (79000)

Developed/Disturbed

- Developed (12000)
- Developed-Golf Course
- Disturbed Habitat (11000)
- Eucalyptus Woodland (79100)
- Unmapped Riparian Corridor

0 225 450 Feet

1 in = 450 feet

Figure 3.3-9
Wildlife Corridor Analysis
Carlton Oaks Country Club and Resort Project EIR

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Wildlife Nursery Sites

The project would avoid direct impacts on the trees that are serving as a rookery for double-crested cormorants. These pond-side trees would not be removed during golf course redesign grading.

Impact BIO-11. Cormorant Rookery.

Construction noise and activity associated with the regrading and redesign of the golf course and construction of the golf resort, if they were to occur during the breeding season, have the potential to disrupt the breeding activities of double-crested cormorants. Disruption or loss of breeding at this rookery would have a significant impact on a wildlife nursery site.

Mitigation Measures

Potentially significant indirect impacts on habitat occupied by double-crested cormorants (**Impact BIO-11**) would be minimized through implementation of **MM-BIO-12**, as described above. Implementation of this measure would result in a less-than-significant impact with mitigation incorporated under CEQA.

Level of Significance After Mitigation

Indirect impacts on double-crested cormorants through the disruption or loss of breeding at the rookery (**Impact BIO-11**) would be reduced to less-than-significant levels through implementation of **MM-BIO-12**, which would minimize indirect construction noise impacts, and **MM-BIO-7** and **MM-BIO-8**, which would ensure avoidance of direct impacts on or around the cormorant rookery trees.

Threshold 5: Would implementation of the proposed project conflict with any applicable local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance or with the provisions of an applicable adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan?

Threshold 5 (City of San Diego): Would the project result in a conflict with provisions of adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan, either within the MSCP plan area or in the surrounding region?

Threshold 6 (City of San Diego): Would the project introduce a land use within an area adjacent to the MHPA that would result in adverse edge effects?

Threshold 7 (City of San Diego): A conflict with any local policies or ordinances protecting biological resources?

Impact Thresholds

In accordance with the City of San Diego's Significance Determination Thresholds, the project would have a significant impact if it would:

- Result in a conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region;
- Introduce land use within an area adjacent to the MHPA that would result in adverse edge effects.
- Result in a conflict with any local policies or ordinances protecting biological resources.

Impact Discussion

City of Santee

As discussed in Section 3.3.3.3, Local, the City of Santee's *General Plan* requires that all development proposals affecting biological resources be consistent with the provisions of the City of Santee's future MSCP Subarea Plan and Implementing Agreement, as well as applicable federal and state regulations. Although the Draft Santee MSCP Subarea Plan has not yet been approved, it is used as a guidance document for development within the City of Santee. As discussed previously, the proposed project has been identified as NAP of the Draft Santee MSCP Subarea Plan; however, the proposed project is adjacent to City of Santee-owned preserve lands (i.e., Mast Park West) and must comply with the Draft Santee MSCP Subarea Plan's Land Use Adjacency Guidelines to reduce potential impacts from development on adjacent preserves.

City of San Diego

For the City of San Diego, the applicable local land use plans, policies, ordinances, or regulations adopted for the purpose of protecting biological resources are the regional San Diego MSCP, the ESL regulations, the City of San Diego MSCP Subarea Plan, and the City of San Diego MHPA Adjacency Guidelines. The animal species covered under the City of San Diego MSCP Subarea Plan that were observed within the BSA include least Bell's vireo, Cooper's hawk, mule deer, and western bluebird. Belding's orange-throated whiptail is also MSCP-covered and was determined to have a high potential to occur. Therefore, this species has been treated as if it were observed. No other MSCP-covered species were observed or determined to have a high potential to occur.

Least Bell's vireo is the only one of these MSCP species that has specific conditions of coverage under the City of San Diego MSCP Subarea Plan (City of San Diego 1997). The conditions of coverage in the City of San Diego MSCP Subarea Plan are as follows:

Jurisdictions will require surveys (using appropriate protocols) during the CEQA review process in suitable habitat proposed to be affected and incorporate mitigation measures consistent with the 404(b)1 guidelines into the project. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. Jurisdictions must require new developments adjacent to preserve areas that create conditions attractive to brown-headed cowbirds to monitor and control cowbirds. Area specific management directives must include measures to provide appropriate successional habitat, upland buffers for all known populations, cowbird control, and specific measures to protect against detrimental edge effects to this species. Any clearing of occupied habitat must occur between September 15 and March 15 (i.e., outside of the nesting period).

Cowbirds prefer habitats with scattered trees among grassland vegetation-woodland edges, including prairies, fields, pastures, and orchards, and is often associated with cows and agriculture (Unitt 2004; Lowther 2020). Cowbirds are widespread in San Diego County (Unitt 2004) and were observed during least Bell's vireo surveys in 2019 and 2022 (Appendix E). Consistent with the conditions of coverage in the City of San Diego MSCP Subarea Plan, surveys were conducted using appropriate protocols, and mitigation measures were designed consistently with the CWA 404(b)1 guidelines to reduce impacts on protected species. The proposed project would not create new development adjacent to preserve areas that are more attractive to brown-headed cowbirds than the existing golf course conditions. No other specific local policies or ordinances are applicable to the proposed project.

In addition to the City of San Diego MSCP, the City of San Diego MHPA delineates core biological resource areas and corridors targeted for conservation. Within the MHPA, limited development may occur. The MHPA represents a “hard line” preserve, in which boundaries have been specifically determined. As discussed previously, the City of San Diego MHPA is present along and within the southern boundary of the BSA, and portions of the existing golf course are designated as MHPA.

The golf course was established in 1958, and the 1959 Lease was entered into by the City of San Diego and the then-current golf course operator for the operation and maintenance of the golf course. The golf course has been in existence since that time under the 1959 Lease, until it was superseded by the 2012 Lease. The golf course was renovated in 1989, long before the original MHPA boundary for the site was established as part of the regional MSCP mapping efforts, which became effective in March 1997. Moreover, the City of San Diego subsequently entered into the 2012 Lease that allowed for the site’s continued use as a golf course after the MSCP was established by the City. The project has been reviewed in accordance with the MSCP, specifically Sections 1.4.1, 1.4.2, 1.4.3, 1.5.2 and 1.5.6 (see Appendix E, Section 4.5).

The proposed development would not change any of the current uses that have been under continued existence since 1959 within the portions of the site that overlap with the MHPA boundary. The golf course would continue to exist in its current state as allowed pursuant to the 2012 Lease. Moreover, the project would not impact the 0.33 acres of MHPA riparian habitat. Because the proposed project would not result in any impacts to the MHPA, and all uses within the MHPA will remain the same, the project is considered a compatible land use per Section 1.4.1 of the MSCP and the golf course land use is what was envisioned by the City of San Diego prior to the adoption of the MHPA. Because the uses are allowed by the 2012 Lease and the golf course has been in existence since before the adoption of the MSCP, the proposed project is consistent with the MSCP and would be considered a compatible land use per Section 1.4.1 of the MSCP. Section 1.4.2 of the MSCP, General Planning Policies and Design Guidelines, includes general planning policies and design guidelines related to roads and utilities; fencing; lighting and signage; materials storage; and mining, extraction, and processing facilities that should be applied in the review and approval of development projects within or adjacent to the MHPA. Because the proposed project would not create any new roads within or adjacent to the MHPA, the design guidelines listed in Section 1.4.2 of the MSCP do not apply. Fencing, lighting and signage, and materials storage are addressed as a part of Section 1.4.3 of the MSCP. The project does not include any mining and therefore the guidelines related to mining, extraction, and processing facilities do not apply. Section 1.5.2 includes general management directives for all areas covered by the MSCP, while Section 1.5.6 includes specific guidelines for the Eastern Area of the MSCP. The project has been designed to comply with the general management directives outlined in Section 1.5.2. The guidelines for the Eastern Area of the MSCP apply specifically to East Elliott and Mission Trails Regional Park. The project would not affect these areas.

Impact Determination

Implementation of the proposed project would not conflict with the provisions of an adopted HCP, NCCP, or other approved state, regional, or local HCP, either within the MSCP, VPHCP, or in the surrounding region. In addition, the proposed project would be consistent with the City of Santee Preserve Land Use Adjacency Guidelines and the City of San Diego Land Use Adjacency Guidelines, and would not introduce a land use within an area adjacent to the MHPA that would result in adverse edge effects. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 8 (City of San Diego): Would implementation of the proposed project result in an introduction of invasive species of plants into a natural open space area?

Impact Discussion

As discussed previously, invasive exotic (i.e., nonnative) plant species can be introduced into adjacent habitat through several means. They can be planted as part of the ornamental landscaping of development or plantings of new residences, and weeds can be introduced through increased movement of people or domestic animals along native areas. Weeds can also be introduced from construction vehicles brought onto the site and tracking in soil containing weed seeds.

The proposed project would not introduce invasive plants that have the potential to affect natural vegetation communities. The proposed project's vegetation palette would not include invasive plant species, nor would invasive plant species be planted in or adjacent to the MHPA. Because the golf course would be planted with a hybrid Bermuda grass species per industry standards, a 10-foot-wide buffer would be established to separate all golf turf from riparian areas. The buffer zone would be planted with native bunch grasses, which would contain the Bermuda grass within the playable golf boundary. The buffer zones are noted on the Grassing Plan for the golf course. The golf course redesign would remove existing ornamental trees, such as Brazilian peppertree, that are considered invasive. Construction vehicles will not enter off-site areas of MHPA; any soil containing weed seeds would either be buried within construction grading or would be within landscaped areas which will be managed to support non-invasive ornamental plantings. Therefore, implementation of project design features would ensure that there would be no significant impact from the introduction of invasive species of plants into a natural open space area.

Impact Determination

Implementation of the proposed project would not result in the introduction of invasive species of plants into a natural open space area. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.3.6 Cumulative Impacts and Mitigation Measures

The geographic area considered for analysis of biological resource cumulative impacts is the City of Santee and the City of San Diego, in which the proposed project is located. Present and reasonably foreseeable future projects that could contribute to cumulative impacts on biological resources include projects with grading, paving, landscaping, road, and building construction of undeveloped land, or with habitat otherwise present. Untreated runoff from

construction or operation activities on land into the San Diego River Watershed via storm drains or sheet runoff also has the potential to contribute to cumulative impacts.

Any present and reasonably foreseeable future projects within the City of San Diego would be required to be consistent with the City of San Diego MSCP subarea plan and VPHCP. The EIR for the San Diego MSCP addressed cumulative impacts. Impacts within the City of San Diego that are consistent with those considered in the MSCP may rely on the MSCP to determine that the project's impacts are not cumulatively considerable. Impacts within the City of San Diego would be mitigated following the requirements of the City of San Diego MSCP subarea plan; therefore, cumulative impacts from impacts within the City of San Diego would be less than significant.

Policy 10.1 of the City of Santee's *General Plan* encourages the conservation of rare or unique plants and wildlife by identifying such resources through the environmental review process and by using open space preservation, where appropriate, to preserve the resources as a condition of a project approval, consistent with the future Santee MSCP Subarea Plan. As such, future projects within the City of Santee would be required to conserve rare or unique plants and wildlife for consistency with the Santee MSCP Subarea Plan, once that subarea plan is approved. There is potential for present and reasonably foreseeable future projects within the City of Santee to result in cumulative impacts before any approval of the Santee Subarea Plan since the Santee MSCP Subarea Plan is a guidance document.

Proposed cumulative projects listed in Table 3-2 in Chapter 3, Impact Analysis, that are within close proximity to the project site include the Woodspring Suites Hotel (under construction) at 8707 Mission Gorge Road, the Ukrainian Catholic Church (under construction) at 9308 Carlton Oaks Drive, Soapy Joe's (approved not built) at 9015 Mission Gorge Road, and the Shell Gas Station (under construction) at 7757 Mission Gorge Road. A significant cumulative impact on biological resources would result if the proposed project contributed to cumulative impacts related to sensitive or special-status species, sensitive habitat/natural communities, federally protected wetlands, wildlife movement corridors, or invasive species.

Cumulative Threshold 1: Would implementation of the proposed project have a substantial cumulative 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 CDFW and USFWS?

Construction of the proposed project has the potential to result in negative impacts on occupied least Bell's vireo breeding habitat and nesting special-status avian species, potential direct impacts on southern cottonwood-willow riparian forest (including disturbed), which is suitable breeding habitat for special-status species, potential disturbance or destruction of nests protected by the MBTA and CFGC, potential direct impacts on native or naturalized vegetation during the nesting-bird breeding season, potential direct impacts on Crotch's bumble bee nests, and potential indirect impacts from construction noise, human activity, nuisance animals, and nighttime lighting (**Impact BIO-5 through Impact BIO-16**). The proposed project would not result direct or indirect impacts on candidate, sensitive, or special-status plant species, including species protected under the MSCP and the VPHCP.

Mitigation measures required for the proposed project would include habitat-based compensatory mitigation and seasonal avoidance of least Bell's vireo habitat, ensure coordination with the applicable agencies, avoid impacts on the habitat of non-listed special-status species, require surveys for Crotch's bumble bees and avoid impacts on these sites through avoidance and/or monitoring prior to the start of construction activities, ensure compliance with the MBTA, avoid vegetation disturbance during the bird-nesting season (**MM-BIO-1 through MM-BIO-8, MM-BIO-13, MM-BIO-14, and MM-BIO-15**), and minimize noise impacts from the operation of construction equipment and construction activities during the breeding season of non-listed avian species (**MM-BIO-12**).

Within the City of San Diego, the proposed project would be consistent with the City of San Diego MSCP Subarea Plan, including providing mitigation at the ratios described in the Plan, entirely avoiding impacts on wetlands, and complying with *Land Use Adjacency Guidelines*. Projects that conform to the MSCP and VPHCP would not result in significant cumulative impacts (City of San Diego 2017).

Within the City of Santee, the project would provide compensatory habitat-based mitigation to ensure that the proposed project's contribution to effects on sensitive species would not be cumulatively considerable.

Similar to the proposed project, other reasonably foreseeable projects could result in a potentially significant impact to special-status species. Other reasonably foreseeable projects within the City of Santee (see Table 3-2, Cumulative Projects, in Chapter 3, Impact Analysis), such as major use permits (e.g., gas stations, hotels) and tentative maps (i.e., residential developments), would be required to comply with federal, state, and local laws and regulations and would therefore also be required to mitigate any potential impacts to less-than-significant levels. No reasonably foreseeable projects within the City of Santee could be implemented without compliance with these laws. As such, the less-than-significant impacts with mitigation from the proposed project are not anticipated to combine with other reasonably foreseeable projects to substantially affect special-status species to a point where their survival in the region is threatened. Therefore, the proposed project's impacts on special-status species would not be cumulatively considerable.

Cumulative Threshold 2: Would implementation of the proposed project have a substantial cumulative adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS?

Cumulative projects located in the vicinity of the proposed project site have the potential to result in impacts associated with riparian habitat and other sensitive natural communities through direct and indirect loss or degradation of habitat. The proposed project would develop and convert up to 0.19 acres of upland Diegan coastal sage scrub habitat within the City of San Diego (**Impact BIO-1**). The City of San Diego impacts are entirely within the MSCP, which addressed cumulative impacts in the EIR for the MSCP. Impacts within the City of San Diego may rely on the MSCP to determine that the project's impacts are not cumulatively considerable. Impacts within the City of San Diego would be mitigated following the requirements of the City of San Diego MSCP Subarea Plan; therefore, cumulative impacts within the City of San Diego would be less than significant.

Unmitigated permanent impacts on 1.72 acres of native and sensitive naturalized (i.e. degraded wetlands) habitat and unmitigated temporary impacts 0.70 acres within the City of Santee would be a cumulatively significant impact (**Impact BIO-2** and **Impact BIO-3**). In addition, water, fugitive dust, and sediment runoff from the construction area has the potential to temporarily affect local water quality, and sediment deposition can negatively affect wetland vegetation communities (**Impact BIO-15** and **Impact BIO-16**). However, the proposed project would be consistent with the mitigation ratios presented in the MSCP and would provide mitigation to avoid impacts on sensitive vegetation communities to compensate for sensitive vegetation community impacts that cannot feasibly be avoided (**MM-BIO-1** through **MM-BIO-10**).

The proposed project would implement project-specific mitigation measures to reduce the proposed project's impacts on riparian habitat or other sensitive natural communities to below a level of significance. Other reasonably foreseeable projects would also be required to comply with regulatory requirements and implement mitigation measures to reduce impacts on riparian habitat or other sensitive natural communities. As such, the less-than-significant impacts with mitigation from the proposed project are not anticipated to combine with other reasonably foreseeable projects to substantially impact riparian habitat or other sensitive natural communities. Therefore, the

proposed project's impacts on riparian habitat or other sensitive natural communities would not be cumulatively considerable.

Cumulative Threshold 3: Would implementation of the proposed project have a substantial cumulative adverse effect on federally or state-protected wetlands (including, but not limited to, marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means?

As discussed under Threshold 3, the proposed project would have no impact (temporary or permanent) on USACE/RWQCB-jurisdictional wetlands. The proposed project would result in permanent and temporary impacts on CDFW-jurisdictional vegetated streambed and riparian habitat, which would represent a significant impact (**Impact BIO-4**). The project would implement a baseline of compensatory mitigation and require the acquisition of wetland permits and authorizations by USACE, RWQCB, and CDFW to reduce impacts to a less-than-significant level (**MM-BIO-3, MM-BIO-4, MM-BIO-5, and MM-BIO-11**).

Reasonably foreseeable future projects in the project site are not anticipated to result in cumulatively significant impacts on federal or state wetlands because these projects would be required to be consistent with applicable federal, state, and local wetland regulations to reduce potential impacts. As such, the less-than-significant impacts with mitigation from the proposed project are not anticipated to combine with other reasonably foreseeable projects to substantially affect federally or state-protected wetlands. Therefore, the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 4: Would implementation of the proposed project result in substantial interference with the movement of 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?

Proposed project development would be clustered near existing residential development, but the golf course would remain as a buffer in many areas between development and open space. Development has been situated to minimize effects on movement corridors and undeveloped preserve areas. However, despite the limited direct impacts, indirect impacts on the cormorant rookery on the project site could result in impacts on this native wildlife nursery site (**Impact BIO-11**). The project proposes mitigation that would minimize impacts on the rookery (**MM-BIO-12**), reducing project impacts to a less-than-significant level.

Other reasonably foreseeable future projects in the project site are not expected to significantly affect wildlife movement corridors, habitat linkages, or wildlife nursery sites because the existing area is characterized by a primarily urban environment, featuring a variety of commercial, industrial, and residential developments. As such, the less-than-significant impacts with mitigation from the proposed project are not anticipated to combine with other reasonably foreseeable projects to substantially affect wildlife movement corridors, habitat linkages, or wildlife nursery sites. Therefore, the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 5: Would implementation of the proposed project conflict with any applicable local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance or with the provisions of an applicable adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan?

As discussed under *Threshold 5*, the proposed project would be designed to meet City of Santee Preserve Land Use Adjacency Guidelines and the City of San Diego Land Use Adjacency Guidelines. Implementation of the proposed project would not conflict with the provisions of an adopted HCP, NCCP, or other approved state, regional, or local HCP, either within the MSCP or VPHCP plan area, or in the surrounding region.

As discussed previously, any reasonably foreseeable projects, including the proposed project, that are approved within the jurisdiction of the City of Santee or the City of San Diego would be required to be consistent with the City of San Diego MSCP Subarea Plan, the City of San Diego MHPA, and each MSCP's Land Use Adjacency Guidelines. The City of Santee would ensure that the project would not conflict with the preparation of the Santee Subarea Plan. Both the Draft Santee MSCP Subarea Plan and City of San Diego MSCP Subarea Plan are also intended to provide cumulative mitigation to ensure that biological resources are sufficiently conserved under the MSCP. In addition, the other reasonably foreseeable future projects in the project site are not expected to significantly affect sensitive biological resources protected under regional or local HCPs because the existing area is characterized by a primarily urban environment, featuring a variety of commercial, industrial, and residential developments.

Because cumulative projects and the proposed project would be required to meet or exceed MSCP requirements, and project-specific mitigation measures would reduce the proposed project's impacts to below a level of significance, the proposed project would comply with the conservation goals identified in regional or local HCPs. Therefore, the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 6: Would implementation of the proposed project result in an introduction of invasive species of plants into a natural open space area? (City of San Diego supplemental threshold)

The proposed project would not indirectly affect natural vegetation communities by introducing invasive plants. The vegetation palette of the proposed project would not include invasive plant species, and no invasive plant species would be planted in or adjacent to the MHPA. Because the golf course would be planted with a hybrid Bermuda grass species per industry standards, a 10-foot-wide buffer would be established to separate all golf turf from riparian areas. The buffer zone would be planted with native bunch grasses, which would contain the Bermuda grass within the playable golf boundary. The buffer zones are noted on the Grassing Plan for the golf course. The golf course redesign would remove existing ornamental trees, such as Brazilian peppertree, that are considered invasive. Project design features would ensure that there would be no potentially significant indirect impacts from invasive plants.

Cumulative Threshold 6 applies to projects within the City of San Diego, which are required to comply with the MSCP and VPHCP; thus, they would not result in significant cumulative impacts (City of San Diego 2017). The less-than-significant impacts with mitigation from the proposed project are not anticipated to combine with other reasonably foreseeable projects to result in substantial impacts from the introduction of invasive species. Therefore, the proposed project's contribution would not be cumulatively considerable.

3.3.7 Summary of Significant Impacts

Significant impacts that could occur as a result of implementation of the proposed project are summarized in Table 3.3-19, along with their associated mitigation measures and the level of significance after mitigation.

Table 3.3-19. Summary of Significant Biological Resource Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact BIO-1. Diegan Coastal Sage Scrub. Direct impacts on	MM-BIO-1. Mitigate Temporary and Permanent Impacts	Less than significant	The proposed project would impact disturbed Diegan coastal sage

Table 3.3-19. Summary of Significant Biological Resource Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
disturbed Diegan coastal sage scrub would represent a significant impact on a sensitive natural community (City of San Diego).	<p>within City of San Diego on Sensitive Upland Vegetation Communities.</p> <p>MM-BIO-7. Qualified Biologist to Provide Construction Monitoring.</p> <p>MM-BIO-8. Delineate Environmentally Sensitive Areas.</p> <p>MM-BIO-9. Stormwater Pollution Prevention Plan.</p> <p>MM-BIO-10. Speed Limits During Construction.</p>		scrub, which is a sensitive natural community. Implementation of these measures would mitigate impacts on disturbed Diegan coastal sage scrub to less than significant.
Impact BIO-2. Permanent Impacts on Sensitive Communities. Direct impacts on sensitive natural or naturalized vegetation communities would represent a significant impact (City of Santee).	<p>MM-BIO-2. Mitigate Permanent Impacts Within City of Santee on Sensitive Upland Vegetation Communities.</p> <p>MM-BIO-3. Mitigate Permanent and Certain Temporary Impacts Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities.</p> <p>MM-BIO-5. Habitat Mitigation and Monitoring Plan (HMMP).</p> <p>MM-BIO-6. Resource Management Plan (RMP).</p> <p>MM-BIO-7. Qualified Biologist to Provide Construction Monitoring.</p> <p>MM-BIO-8. Delineate Environmentally Sensitive Areas.</p> <p>MM-BIO-9. Stormwater Pollution Prevention Plan.</p> <p>MM-BIO-10. Speed Limits During Construction.</p>	Less than significant	The proposed project would impact sensitive upland vegetation communities within the City of Santee. Implementation of these measures would mitigate impacts on the sensitive upland vegetation communities to less than significant.
Impact BIO-3. Temporary Impacts on Sensitive Communities. Direct	MM-BIO-3. Mitigate Permanent and Certain Temporary Impacts	Less than significant	The proposed project would affect sensitive riparian and wetland

Table 3.3-19. Summary of Significant Biological Resource Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
temporary impacts on sensitive natural or naturalized vegetation communities would represent a significant impact (City of Santee).	<p>Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities.</p> <p>MM-BIO-4. Mitigate Temporary Dewatering Impacts Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities.</p> <p>MM-BIO-5. Habitat Mitigation and Monitoring Plan (HMMP).</p> <p>MM-BIO-6. Resource Management Plan (RMP).</p> <p>MM-BIO-7. Qualified Biologist to Provide Construction Monitoring.</p> <p>MM-BIO-8. Delineate Environmentally Sensitive Areas.</p> <p>MM-BIO-9. Stormwater Pollution Prevention Plan.</p> <p>MM-BIO-10. Speed Limits During Construction.</p>		vegetation communities within the City of Santee. Implementation of MM-BIO-3, MM-BIO-4, MM-BIO-5 would provide compensatory habitat-based mitigation for impacts. MM-BIO-6 would ensure that the long-term management of mitigation would occur. MM-BIO-7 through MM-BIO-10 would ensure that the project minimizes impacts on this resource. This would ensure impacts are reduced to less-than-significant.
Impact BIO-4. Wetland Impacts. Impacts on wetlands (e.g., marsh, riparian) would represent a significant impact on state-jurisdictional wetlands.	<p>MM-BIO-3. Mitigate Permanent and Certain Temporary Impacts Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities.</p> <p>MM-BIO-4. Mitigate Temporary Dewatering Impacts Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities.</p> <p>MM-BIO-5. Habitat Mitigation and Monitoring Plan (HMMP).</p> <p>MM-BIO-6. Resource Management Plan (RMP).</p>	Less than significant	The proposed project would affect state wetlands. Implementation of MM-BIO-3, MM-BIO-4, MM-BIO-5 would provide compensatory habitat-based mitigation for impacts. MM-BIO-6 would ensure that the long-term management of mitigation would occur. MM-BIO-7 through MM-BIO-10 would ensure that the project minimizes impacts on this resource. Implementation of MM-BIO-11 would require the developer to obtain necessary permits and authorizations to mitigate

Table 3.3-19. Summary of Significant Biological Resource Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
	MM-BIO-7. Qualified Biologist to Provide Construction Monitoring. MM-BIO-8. Delineate Environmentally Sensitive Areas. MM-BIO-9. Stormwater Pollution Prevention Plan. MM-BIO-10. Speed Limits During Construction. MM-BIO-11. Wetland Permits.		impacts to less-than-significant levels.
Impact BIO-5. Least Bell's Vireo Breeding Habitat. The proposed project would have permanent direct impacts on least Bell's vireo breeding habitat (City of Santee).	MM-BIO-3. Mitigate Permanent and Certain Temporary Impacts Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities. MM-BIO-4. Mitigate Temporary Dewatering Impacts Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities. MM-BIO-5. Habitat Mitigation and Monitoring Plan (HMMP). MM-BIO-6. Resource Management Plan (RMP). MM-BIO-7. Qualified Biologist to Provide Construction Monitoring. MM-BIO-8. Delineate Environmentally Sensitive Areas. MM-BIO-9. Stormwater Pollution Prevention Plan. MM-BIO-10. Speed Limits During Construction. MM-BIO-14. Mitigation, Monitoring, and Reporting Conditions for Potential	Less than significant	Implementation of these mitigation measures would reduce potentially significant direct and indirect impacts on habitat occupied by least Bell's vireo to less-than-significant levels.

Table 3.3-19. Summary of Significant Biological Resource Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
	Impacts to Occupied Least Bell's Vireo Habitat.		
Impact BIO-6. Non-listed Special-Status Species Habitat. The project would have permanent direct impacts on potentially suitable breeding habitat for special-status species. The loss of habitat for these species would have a potentially significant impact.	<p>MM-BIO-1. Mitigate Temporary and Permanent Impacts Within City of San Diego on Sensitive Upland Vegetation Communities.</p> <p>MM-BIO-2. Mitigate Permanent Impacts Within City of Santee on Sensitive Upland Vegetation Communities.</p> <p>MM-BIO-3. Mitigate Permanent and Certain Temporary Impacts Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities.</p> <p>MM-BIO-4. Mitigate Temporary Dewatering Impacts Within City of Santee on Sensitive Riparian and Wetland Vegetation Communities.</p> <p>MM-BIO-5. Habitat Mitigation and Monitoring Plan (HMMP).</p> <p>MM-BIO-6. Resource Management Plan (RMP).</p> <p>MM-BIO-7. Qualified Biologist to Provide Construction Monitoring.</p> <p>MM-BIO-8. Delineate Environmentally Sensitive Areas.</p> <p>MM-BIO-9. Stormwater Pollution Prevention Plan.</p> <p>MM-BIO-10. Speed Limits During Construction.</p>	Less than significant	Implementation of these mitigation measures would reduce potentially significant impacts on the habitat of non-listed special-status species to a less-than-significant level through implementation of habitat-based mitigation and avoidance.
Impact BIO-7. Nesting Birds. Impacts on native or naturalized vegetation	MM-BIO-12. Minimize Indirect Noise Impacts on	Less than significant	Implementation of these mitigation measures would reduce potentially

Table 3.3-19. Summary of Significant Biological Resource Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
during the bird-breeding season would have the potential to affect nesting birds. Any project-related activities that result in the death of nesting birds could be a violation of federal and state laws and would be a significant impact.	Non-listed Riparian Birds and Raptors. MM-BIO-13. Avoid Disturbance of Vegetation During Bird-Nesting Season. MM-BIO-18. Homeowner Education Program.		significant impacts during construction activities on native vegetation and nesting birds to a less-than-significant level.
Impact BIO-8. Crotch's Bumble Bee. If Crotch's bumble bee were present underground during site grading, the impacts would be significant.	MM-BIO-15. Crotch's Bumble Bee Preconstruction Surveys.	Less than significant	The proposed project has the potential to affect Crotch's bumble bee habitat. Implementation of MM-BIO-15 would require the developer to conduct pre-construction surveys prior to ground disturbance to mitigate impacts to a less-than-significant level.
Impact BIO-9: Western Spadefoot. If western spadefoot were present underground during site grading, the impacts would be significant.	MM-BIO-16. Western Spadefoot Pre-construction Survey.	Less than significant	The proposed project has the potential to affect western spadefoot habitat. Implementation of MM-BIO-16 would require the developer to conduct pre-construction surveys prior to ground disturbance to mitigate impacts to less than significant.
Impact BIO-10: Western Burrowing Owl. If Western burrowing owl were present underground during site grading, the impacts would be significant.	MM-BIO-17. Western Burrowing Owl Pre-construction Survey.	Less than significant	The proposed project has the potential to affect Western burrowing owl habitat. Implementation of MM-BIO-17 would require the developer to conduct pre-construction surveys prior to ground disturbance to mitigate impacts to less than significant.
Impact BIO-11. Cormorant Rookery. Construction activities, if they were to occur during the breeding season,	MM-BIO-7. Qualified Biologist to Provide Construction Monitoring.	Less than significant	The proposed project has the potential to affect a cormorant rookery, which is a wildlife nursery site. Implementation of MM-

Table 3.3-19. Summary of Significant Biological Resource Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
would have potential to disrupt the breeding activities of double-crested cormorants. Disruption or loss of breeding at this rookery would be a significant impact on a wildlife nursery site.	MM-BIO-8. Delineate Environmentally Sensitive Areas. MM-BIO-12. Minimize Indirect Noise Impacts on Non-listed Riparian Birds and Raptors.		BIO-7, MM-BIO-8, and MM-BIO-12 would require the developer to mitigate impacts during construction activities to the cormorant rookery to a less-than-significant level.
Impact BIO-12. Construction Noise. Indirect, temporary impacts on special-status animal species could occur due to construction-related noise that can impact special-status animal species. These indirect, temporary impacts from noise could be potentially significant.	MM-BIO-12. Minimize Indirect Noise Impacts on Non-listed Riparian Birds and Raptors. MM-BIO-13. Avoid Disturbance of Vegetation During Bird Nesting Season.	Less than significant	Implementation of these mitigation measures would reduce potentially significant impacts during construction activities on special-status animal species to a less-than-significant level.
Impact BIO-13. Indirect Human Activity. The proposed project would increase human activity in the vicinity of sensitive habitat. Project design features and additional measures would be needed to reduce indirect human activity impacts to a less-than-significant level.	MM-BIO-18. Homeowner Education Program.	Less than significant	Implementation of these mitigation measures would reduce potentially significant impacts from human activity in the vicinity of sensitive habitat during construction activities to a less-than-significant level.
Impact BIO-14. Domestic Animals. Animals associated with residential development can have a significant impact on wildlife due to increased predation. Homeowner education will be required to reduce the potential increase of domestic pets.	MM-BIO-18. Homeowner Education Program.	Less than significant	Implementation of this mitigation measure would help ensure the control of domestic pets and reduce this impact to a less-than-significant level.
Impact BIO-15. Water Quality. Water and sediment runoff from the	MM-BIO-9. Stormwater Pollution Prevention Plan.	Less than significant	Implementation of this mitigation measure would reduce potentially

Table 3.3-19. Summary of Significant Biological Resource Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
construction area has the potential to temporarily affect local water quality, and sediment deposition can negatively affect wetland vegetation communities. Temporary indirect impacts on sensitive wetland vegetation communities would be a potentially significant impact.			significant impacts during construction activities on water quality and sensitive vegetation to a less-than-significant level.
Impact BIO-16. Fugitive Dust. Dust resulting from heavy equipment grading the project could settle on nearby vegetation and interfere with the photosynthetic process of native vegetation, which could be a potentially significant impact on sensitive vegetation communities.	MM-BIO-9. Stormwater Pollution Prevention Plan. MM-BIO-10. Speed Limits During Construction.	Less than significant	Implementation of these mitigation measures would reduce potentially significant fugitive dust impacts during construction activities on sensitive vegetation to a less-than-significant level.

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3.4 Cultural and Tribal Cultural Resources

3.4.1 Overview

This section describes the existing conditions and applicable policies and regulations related to cultural resources, and provides an analysis of impacts that may result from construction and operation of the proposed Carlton Oaks Country Club and Resort Project (project). The information in this section is based on the *Cultural Resources Inventory and Evaluation Report* prepared for the project (January 2025), which is included as Appendix F.

For purposes of the California Environmental Quality Act (CEQA), cultural resources referred to as *historical resources* consist of intact built environment resources dating from the historic period (i.e., 50 years or older), and *archaeological resources* include prehistoric resources (i.e., pre-contact with Europeans) and historic resources (i.e., post-contact Native American and European). CEQA considers impacts on “tribal cultural resources” defined 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 meeting eligibility criteria. CEQA also uses the term *unique archaeological resources* to denote archaeological artifacts, objects, or sites that are not considered historical or archaeological resources, but do contain information needed to answer important scientific research questions, have a special and particular quality, or are directly associated with an important prehistoric or historic event or person (CEQA Section 21083.2[g]).

3.4.2 Environmental Setting

Unless otherwise referenced, the information in this section summarizes the prehistoric archaeological, ethnographic, and historic contexts developed in the *Cultural Resources Inventory and Evaluation Report* (Appendix F), which contains extensive references to primary and secondary sources that have informed the briefer background discussions provided below.

3.4.2.1 Prehistoric Context

The prehistoric occupation of what is now San Diego County has been documented as extending back at least 10,000 years or earlier. The prehistory of the region is generally divided into three chronological periods, Paleoindian, Archaic, and Late Prehistoric, which have been further divided into other periods or renamed based on technological and/or geographic variations.

Paleoindian Period

The earliest well-documented archaeological sites in the region are identified as belonging to the Paleoindian period, which has locally been termed the San Dieguito complex and is believed to have lasted until 8,000 years before present (B.P.). During this period, the economy is understood to have focused on highly ranked resources, such as large mammals, and relatively high mobility, which may be related to following big game. In the Channel Islands and along California’s mainland coastal regions, sites dating back from 13,000 to 11,600 B.P. have also offered evidence that early inhabitants of this region relied on marine resources for food. Although no coastal assemblages dated to earlier than 10,000 B.P. have been documented along the San Diego shoreline, it is inferred that the absence of sites is largely a function of a long-term trend in sea-level rise and shoreline erosion in the region. These trends are likely to have obscured and/or destroyed early coastal sites.

Artifacts associated with this time period reflect a focus on hunting and include large knives and spear points, small scrapers, and choppers, and there is scant evidence of groundstone technology for processing vegetal products, such as seeds or acorns. This apparent absence of milling is viewed as the major difference between the Paleoindian period and Archaic period sites.

Archaic Period

At approximately 8000 B.P., the economic focus of prehistoric populations began to become more diverse, although they still focused on hunting and gathering. This period is generally known as the Archaic period, or the La Jolla/Early Millingstone complex locally, and lasted until roughly 1500 B.P. This period is differentiated from the Paleoindian period by a shift to a more generalized economy and increased focus on processing vegetal remains, such as seeds and berries, and exploitation of marine resources along the coast. These shifts in technology and resource exploitation may have occurred as populations moved in response to a change in climatic conditions. In any case, the frequency of coastal archaeological sites declined in the current San Diego region after around 4000 B.P. This indicates a shift from mostly maritime subsistence to a diet derived more from land-based resources. The Archaic period is reflected in the artifact assemblage, with an increase in the number of groundstone artifacts, such as manos and portable metates, atlatl points, large Pinto- and Elko-series bifaces, and core-based tools.

Late Prehistoric Period

Starting at around 1300 B.P., the archaeological record reflects the emergence of two cultural traditions in the San Diego region. The range and spatial distribution of site types, as well as site constituents for both traditions, is thought to reflect the ethnographically observed lifeways of the Kumeyaay and Luiseño peoples. Although these two groups have clear linguistic and cultural distinctions, both appear to have designed their land use around the intensive exploitation of a range of local resources, and established permanent to semipermanent villages from the coast to the mountains and foothills. Both groups also adopted the use of small projectile points and pottery, and showed intensified use of acorns.

Based on ethnographic data, the boundary between the lands of the Kumeyaay (to the south) and Luiseño (to the north) occurred in the vicinity of what is now called Agua Hedionda and Batiquitos Lagoon. It is unknown, however, whether this boundary reflects a persistent spatial division between the two groups or the most recently recorded position of a boundary that fluctuated over time. Regardless, the project site is within an area traditionally inhabited by the Kumeyaay. Archaeological sites attributed to the Kumeyaay are characterized by a range of artifact types referred to as the *Cuyamaca complex*, which includes small, triangular, pressure-flaked projectile points; mortars and pestles; drilled-stone ornaments; olivella beads; a steatite industry; ceramics; and urn cremations. Archaeological sites attributed to the Luiseño (termed the *San Luis Rey complex*) contain a similar range of artifact types, but tend to show lesser frequencies of side-notched projectile points, ceramics and ceramic forms, and milling stones, and cremations tended to be ungathered.

3.4.2.2 Ethnographic Background

The project area was traditionally inhabited by the Kumeyaay people, who spoke the Tipai dialect of the Yuman language. The Kumeyaay inhabited a region that contained what is now southern San Diego County, west and central Imperial County, and the Northern Baja peninsula. Speakers of the Tipai dialect traditionally lived south of the San Diego River, and speakers of the Ipai tended traditionally lived north of the San Diego River.

For habitation and resource collection, the Kumeyaay used a wide range of environments, including the coast, foothills, mountains, and desert. In response to the wide-ranging conditions in these environments, the Kumeyaay used a variety of settlement strategies. For example, residential mobility was commonly practiced in desert environments, where resources were sparse and widely distributed, whereas large, seasonal residential bases were established in the mountains and foothills. In keeping with the wide range of environments that they inhabited, the Kumeyaay exploited a gamut of resources, including terrestrial mammals, birds, fish and marine invertebrates, grasses, manzanita, sage, sunflowers, lemonade berry, chia, mesquite, agave, and acorns. The latter was particularly important because acorns could be processed and stored for long periods.

The Kumeyaay appear to have had considerable variability in the level of social organization and settlement. They were organized by patrilineal, patrilocal lineages that claimed prescribed territories, but they did not own the resources in general.

3.4.2.3 Historical Background

Historic Periods

Native American History

The Kumeyaay did not encounter Spanish colonists in any great number until 1769, when the Spaniards founded Mission San Diego de Alcalá. In 1798, colonists established the second mission in today's San Diego County, Mission San Luis Rey de Francia, approximately 40 miles to the north. These institutions played a role in a larger network that used Native American inhabitants as laborers and attempted to convert them to Catholicism. Despite numbering some 20,000 before contact, the nature of this work and the arrival of European diseases, to which the Kumeyaay had little immunity, led to a dramatic decrease in the tribe's population.

Harsh treatment of the Kumeyaay continued into the nineteenth century. After Mexico attained independence in 1821, the newly formed nation also forced the Kumeyaay from their lands and into labor. Following the end of the Mexican–American War in 1848, when the United States annexed the territory of California, similar treatment persisted. In 1852, the United States Congress rejected a treaty to establish reservations for the Kumeyaay, and the region's lands became overrun with Euro-American settlers, farmers, and industrialists. Decades later, the United States Congress passed the 1891 Act for the Relief of Mission Indians, which relegated the remainder of the Kumeyaay people to small reservations, often lacking adequate water. Many descendants of the tribe continue to live near these areas today.

Spanish Period

The historic period in California began with the early explorations of Juan Cabrillo in 1542. Cabrillo came ashore on what is now Point Loma to claim the land for Spain and gave it the name San Miguel. Sixty years passed before another European, Sebastián Vizcaíno, entered the bay on November 10, 1602, and gave it the name San Diego. Extending from 1769 to 1821, the Spanish period encompassed early exploration and subsequent establishment of the Presidio of San Diego and Mission San Diego (1769), Mission San Juan Capistrano (1776), and Mission San Luis Rey (1798). Located on Presidio Hill, San Diego's original Spanish settlement consisted of a presidio (i.e., fort) and a chapel that also served as Alta California's first mission. From its original outpost on what is now Presidio Hill, Mission San Diego de Alcalá was moved to roughly its current site in Mission Valley in 1774. In November 1774, Tipay warriors attacked the mission from south of San Diego River, razed the complex, and killed Father Luis

Jayme and two others. Spaniards rebuilt the mission in 1775, and, although it was one of the least successful missions in the chain of California missions, it firmly established Spain's presence in the region.

Mexican Period

A substantial decline in the indigenous population left the mission system struggling by the time Mexico won its independence in 1821. In 1834, the new nation secularized all surviving missions and distributed the lands to mainly government officials and retired soldiers. These land grants, called *ranchos*, defined land use in the area until the end of the Mexican–American War. In 1845, Governor Manuel Micheltorena granted the 48,700-acre El Cajón Rancho, near San Diego, to Doña María Antonia Estudillo de Pedorenena. The family constructed an adobe near the present-day neighborhood of Lakeside and a secondary residence at the eastern reaches of Mission Gorge. Fueled by the growing ranching industry, the Pueblo of San Diego continued growing near this estate as new transportation routes began to better connect the region to the rest of Mexico.

American Period

From 1850, when California became a state, through much of the 1870s, the El Cajón Rancho near San Diego remained largely in the Pedorenena family. In 1877, George A. Cowles purchased 4,000 acres of the estate and converted this land—which contained the present-day City of Santee—into a vineyard and cultivated tree species new to the area, including magnolia and pomegranate. The area soon became known as Cowlestown.

In the 1880s, a transcontinental railway arrived in San Diego, the second to reach Southern California (the Pacific Railroad was the first). San Diego's population skyrocketed to 35,000 within a few years, and settlers founded many new towns and communities throughout the region. Real-estate speculation during the boom eventually caused an economic collapse. Many moved on from their new homes, but some small pioneer communities remained, practicing dry farming; raising livestock; and, in some cases, building civic infrastructure, such as schools and post offices. San Diego, more established than its surrounding speculative settlements, recovered from the collapse and continued urbanizing.

Newly built railways and roads began extending from San Diego inland, which allowed better coastal access for farmers and mining enterprises in areas like Ramona, Julian, and the Santa Ysabel Valley. Cowlestown, aided by this new connectivity, continued growing through the late nineteenth and early twentieth centuries. George Cowles died in 1887, and, in 1890, his wife married Milton Santee, a wealthy real estate developer and mine owner. The town established its own post office and school and soon changed its name to Santee.

In 1885, Hosmer McKoon, a wealthy attorney from San Francisco, arrived in the area with his wife and established Fanita Ranch. This farm, along with other agricultural enterprises in the area, made Santee a significant center of cattle and dairy production by the 1920s. The Carlton Company, a real estate development firm, purchased 4,300 acres of Fanita Ranch in 1958.

During World War II, the United States acquired 700 acres of agricultural land at Santee's southeastern edge, converting the land into a training field for parachute battalions in 1942. The United States Navy constructed two runways at the facility, which the military named Gillespie Field after marine captain Archibald M. Gillespie, who occupied San Diego during the Mexican–American War. In 1947, the County of San Diego assumed ownership of the airfield, which it continues to operate as a local airport today.

In the post-war era, Santee grew rapidly. Between 1950 and 1970, Santee grew from 2,000 residents to 25,750. To exercise more control of this growth, the town incorporated as a city in 1980.

History of Golf and Carlton Oaks

Golf Course Design

The modern game of golf first took shape in coastal Scotland in the nineteenth century. Early golfers played on existing natural landscapes until the 1840s, when wealthier clubs began adding bunkers and wooden bulkheads to their courses. The present-day format of an 18-hole course began in the 1860s and became a standard that immigrant Scots brought to other countries.

After the turn of the twentieth century, new technologies made it cheaper to transform landscapes, spurring the so-called “Golden Age” of golf in the United States, when the game became an important leisure activity for the wealthy. From 1916 to 1929, the number of golf courses in the United States increased from 750 to 6,000. Railroad companies and real estate developers became attracted to the industry and began building destination golf courses, such as Pebble Beach, Gleneagles, and Banff Springs. Early in this era, landscape designers used hazards such as bunkers and lakes to create courses that rewarded trajectory and placement, rather than simply drive distance.

During the Great Depression (1929–1939), golf’s Golden Age ended due to lack of funds, but large-scale course development resumed in the prosperity of the post-war era. Real estate developers began constructing housing tracts for middle class families, many of them including golf courses as part of their planned communities. Golf began to take on a more prominent role in everyday American life, and soon became a staple at resorts and municipal recreational facilities.

During this boom in the 1950s, a course design paradigm rose to prominence, led by Cornell-educated golf course architect Robert Trent Jones and his competitor, Dick Wilson. Having both worked as apprentices for Golden Age designers, their courses focused on grandeur and scale—made more easily navigable by the advent of the motorized golf cart. Although not considered exemplary today, the courses associated with this period represent an important transitional period between Golden Age design and the more-compact, strategic courses associated with the 1960s.

From the 1960s onward, approaches to golf course designs became more diverse in response to a variety of priorities. Pete Dye, a former insurance agent turned golf course designer, began designing denser courses that only occasionally emphasized power. Dye designed world-famous courses, such as Harbour Town Links in South Carolina, with the goal of hosting competitive tournaments for championship-level golfers. Jack Nicklaus and Greg Norman also achieved a similar status designing courses with the same goals as Dye. Simultaneously, designers such as Bill Gore and Ben Crenshaw developed minimalist courses that used existing landscape features whenever possible. In this way, designers began incorporating more nuance into courses that were often dependent on existing conditions—a stark contrast with courses created during the previous era under Jones.

In recent years, advancements in equipment have allowed golfers to drive the ball much farther than their predecessors. This new capability has forced most of the world’s courses to extend in length. Designers have begun inspecting previous course layouts, even completely reconstructing some facilities. Others have sought to restore older features in their redesigns and incorporate them into their new, augmented designs.

Golf and Golf Courses in San Diego County

Golf arrived in Southern California in the 1890s, and local enthusiasts constructed San Diego County's first course in 1897. The nine-hole course stretched 2,389 yards and, due to the region's dry climate, consisted of sand greens and dirt fairways. Golf's popularity expanded in the area, and, in 1898, the course's creators founded the San Diego Country Club. Soon after, the Coronado Country Club constructed the area's second course to serve guests at Hotel Del Coronado, and a municipally funded course—now the oldest operating course in San Diego County—arrived in 1913.

During golf's Golden Age in the 1920s, the number of golf courses in Southern California more than doubled, and the San Diego area's Mediterranean climate, abundant land, and proximity to the coast made it the ideal location for hosting competitions of international repute. By the early 1930s, the San Diego County had seven 18-hole private and semi-public golf courses, all grass, within or near the city limits of Agua Caliente, San Diego, La Jolla, Coronado, La Mesa, Rancho Santa Fe, and Emerald Hills; the area also offered nine-hole courses in Escondido and Sweetwater Valley. Publicly funded courses also played a role, and, in 1930, the San Diego City Council approved a plan to irrigate the Municipal Golf Course in Balboa Park, which New Deal funds during the Great Depression improved even further.

In the post-war era, the federal government constructed the first San Diego Aqueduct pipeline, bringing an unprecedented amount of water to the area for irrigating new courses. This unparalleled period of growth in Southern California led to the construction of the Mission Valley Country Club in 1947, which hosted the San Diego Open several times between 1952 and 1967. In 1956, the San Diego City Council approved plans to develop courses on land formerly used by the United States Army at Camp Callan. The City of San Diego constructed the Torrey Pines golf course on the site, designed by William F. Bell. Its coastal viewsheds made the course famous nationally, and it hosted multiple televised professional competitions throughout the 1960s. Minorly altered, the course was recently found eligible for listing in the National Register of Historic Places as a significant example of Bell's golf course designs.

By the end of the 1950s, San Diego County had more than 15 golf courses, and that number continued to increase. Public and private entities developed an additional 19 courses during the 1960s, including Carlton Oaks Golf Course and Country Club in 1960, as well as the famous 18-hole championship course at La Costa Resort and Spa in Carlsbad, opened in 1965. Starting in 1969, the Professional Golfers Association held its Tournament of Champions at this course for three decades. By the latter 1990s, the San Diego County had 61 regular golf courses and 18 short courses.

Carlton Oaks Golf Course and Country Club

In 1956, Bill Mast and his company, Carlton Industries, purchased 4,400 acres of Fanita Ranch in the City of Santee for \$1 million. Within 4 years, the company had begun developing a housing tract and golf course, named Carlton Oaks after the trees planted at the site by Native Americans working under the mission system. A clubhouse with other recreational facilities followed suit, along with adjacent residential developments built by other companies, such as Volk McLain Incorporated, which constructed nearly 200 homes in the immediate area.

Designed by prominent Los Angeles-based course architect Bill Tucker, Carlton Oaks opened in two phases in 1961 and 1962, occupying a large area at the lower end of the wooded Santee Valley and lying in a floodplain of the San Diego River. Aerial photography indicates that the river ran the length of the course, providing a periodic natural

water feature. The 72-par course contained more than 7,000 yards of fairways and greens, interspersed with various tree species, as well as lakes and water holes, which played a role in the landscape's watering system.

Management operated Carlton Oaks as a public facility for 1 year before shifting its use to private membership associated with the newly constructed Carlton Oaks Country Club. In December 1962, the development company held a groundbreaking ceremony for the \$200,000 building, which opened in May the following year. Designers located the 7,000-square-foot, Ranch-style building on a hill overlooking a view of play of 12 holes. Its facilities included a bar, grill, dining room, steam room, lockers, outdoor patio, pool, and tennis courts. The company added other features, such as an outdoor terrace and putting green, from 1964 to 1966.

In 1965, Mast and his company added a 44-unit lodge just east of the clubhouse. Designed by architect Mark Faddis, the 18,000-square-foot, two-story building included eight executive suites and 36 one-bedroom units. Also built in the Ranch style, the lodge's exterior wall cladding was board-and-batten with plaster. The lodge's landscaping, designed by Kenneth J. Hayashi, included park-like grounds with olive, evergreen pear, sycamore, and toyon trees, which isolated the club from surrounding residential areas.

B.T. Babbitt of Philadelphia purchased the Santee-Carlton Corporation in 1968, although Bill Mast remained president and continued managing the country club and lodge. The operation continued expanding throughout the late 1960s. In 1968, the company made plans to add an additional 48 units and four tennis courts to the lodge, and remodel the clubhouse's dining room and lounge. Although the company failed to construct additional units, historic aerial photography indicates that it did complete the casita buildings and an on-site single-family residence between 1968 and 1971. The corporation also added four tennis courts (no longer extant) sometime in the 1970s.

Meanwhile, residential construction surrounding the golf course stalled somewhat in the 1960s before growth resumed in the 1970s. Many homes in the modest housing tracts produced by the Santee-Carlton Corporation and Volk-McClain remained vacant in 1968, largely due to a housing surplus in the San Diego area. However, population growth and increased access to the San Diego area following the construction of Mission Gorge Road and Highway 67 improved prospects around Carlton Oaks. By 1971, new housing construction had resumed on lots in a neighborhood south of Carlton Oaks Drive and north of the golf course.

Carlton Oaks became a highly ranked course in the 1970s, but was heavily damaged by flooding during the winters of 1979, 1980, and 1981. Water destroyed parts of its low-lying topography, repeatedly covering the course in mud and sand, and turning its landscape into weeds and dirt. The company estimated the costs of recovering from the 1979 flooding alone at \$300,000.

Dye Designs, led by prominent golf course architect Peter Dye, redesigned the course in the late 1980s, with the goal of accelerating the rate of play to increase profits. The new design reversed the sequence of play from its original start on the eastern side of the course to the western side. The general arrangement of nine holes on either side of the clubhouse remained consistent, with the first hole sited slightly farther from the clubhouse. The changes appear to have respected pre-existing corridors while creating some new water basins and draining others, and adding more trees and bunkers. Dye Designs relocated each of the holes slightly, keeping the same spacious pattern of play through long fairways, but allowing players to move between holes more efficiently. The redesign also expanded the network of golf cart paths substantially.

Ranch-Style Architecture

The Carlton Oaks Country Club buildings are examples of the Ranch style. Although mostly famously associated with post-war suburban housing, this building approach—which uses a low-slung, sprawling building form—had various pre-war predecessors. These included the Mexican period hacienda of the southwest, as well as nineteenth century wood-framed farmhouses of the American west. Both styles combined asymmetrical forms and rustic features, such as adobe walls, board-and-batten cladding, and tile or shake roofs, some of which remained prevalent in the post-war Ranch style. Famous predecessors include the hacienda-like Bandini House (1903) from famed Craftsman architects Charles and Henry Greene, and the Gregory Farmhouse (1928) in the Santa Cruz Mountains, designed by William Wurster. Additionally, the pre-war Modernist movement associated with Frank Lloyd Wright influenced the style through its Usonian houses, which emphasize horizontality and had broad, low-pitched roofs.

The early Ranch style in California is most notably associated with Cliff May. Designing haciendas in the San Diego area in the 1930s, May departed from convention, orienting residences inward through a lack of front windows, and with rear yards or internal, enclosed courtyard spaces. He followed a similar pattern when designing so-called “rancherias” in a western aesthetic for wealthier clients on larger plots of land. These examples used U-, L-, or H-shaped floorplans, board-and-batten wall cladding, prominent windows, and large chimneys to create a feeling of rusticity.

Although May has become directly linked with the style, the salience of western-themed movies, literature, imagery, clothing, and toys in American popular culture during the early- to mid-twentieth century helped reinforce the appeal of the Ranch style among many architects. In the Los Angeles area, several designers began offering Ranch-style designs prior to World War II, including Gerard Colcord, H. Roy Kelley, Wallace Neff, Lulah Maria Riggs, Sumner Spaulding, and Paul R. Williams. Additionally, David Bohannon, working in the San Francisco region, created more modest, scaled-down versions of the Ranch style homes designed by May.

In the post-war era, economic prosperity, growing population and family size, and unprecedented levels of automobile ownership created demand for more housing-tract development and larger suburban homes. The Ranch style provided architects and builders with a means of satisfying this demand while controlling construction costs and creating affordable homes that appealed to emerging consumer tastes. The Ranch home soon became the most popular single-family residential building type in California and elsewhere in the United States.

So-called “Traditional” Ranch-style homes offered the comforts of a modern home while maintaining a rustic aesthetic rooted in the predecessors described above. Character-defining features of the style include board-and-batten or other forms of wood cladding, faux shutters, dove-cotes, and diamond glazing. Additionally, the style emphasized informal composition; elongated, open, and sometimes meandering floor plans; horizontal emphasis and a low-slung profile; and the home’s close relationship to surrounding outdoor space, which included an emphasis on increasing natural lighting of interior space.

Occasionally, commercial and institutional developers embraced the Ranch style, particularly in areas where the style was also prevalent in residential construction. By building in a similar style to the surrounding tract homes, architects managed to blend schools, churches, community centers, civic buildings, and shopping plazas into their surroundings.

The style continued to evolve through the 1950s and 1960s. The Contemporary Ranch home, for example, maintained the basic massing form of its traditional predecessor while accommodating abstract stylings and

irregular roof pitches. Other variations on the style include Storybook, Tiki-Polynesian, and Cape Cod, which also build on the Ranch style's basic form through eccentric ornamentation.

3.4.2.4 Archaeological Sites

An intensive pedestrian survey and archaeological testing and evaluation of two cultural resources were conducted in the study area to determine whether significant resources were present and to analyze the project's potential impacts on such resources. To accomplish this, an intensive pedestrian survey and shovel test-pit (STP) excavations were conducted in potentially intact sediments containing artifact concentrations or potential archaeological features. Once excavations revealed intact subsurface deposits, STP and test excavation unit excavations were conducted to determine the extent of the site boundary. These efforts examined both previously untested and unevaluated archaeological resources in the study area.

Survey efforts were informed by a records search at the South Coastal Information Center (SCIC) and archival research. Cultural resources and heritage resources record searches for the project area were conducted at the SCIC at San Diego State University on May 22, 2019. An additional visit was made to the SCIC on October 9, 2019, to get a site record that was not available at the time of the initial records search. The records searches included a review of all recorded historic and prehistoric archaeological sites, as well as recorded built environment resources within 0.25 miles (0.4 kilometers) of the project site. Data collected, reviewed, and synthesized to identify cultural resources were derived from the following sources:

- SCIC database of the California Historical Resources Information System
- National Register of Historic Places
- California Register of Historical Resources (CRHR)
- California Points of Historical Interest
- California State Historical Resources Inventory
- San Diego History Center
- University of California San Diego Geisel Library
- Historic U.S. Geological Survey Topographic Quadrangles
- Historic Aerials
- Consultation with the California Native American Heritage Commission (NAHC)
- NAHC Sacred Lands File Search

A total of 72 cultural resources studies have been conducted within the 0.25-mile records search buffer. Nine of the cultural resource studies overlap with the project site. Results of the records search indicate that 18 previously recorded resources are within 0.25 miles of the project site, of which one (P-37-030866/CA-SDI-19604) intersects the study area (Table 3.4-1). After research, this site was found to be part of nearby site P-37-000204/CA-SDI-204. Sixteen of the resources in the 0.25-mile buffer are prehistoric-era sites, and two are prehistoric isolates. The majority of the prehistoric-era sites are habitation sites and lithic scatters. During background research of other sites and studies, it was discovered that an old Museum of Man site, SDM-W-200, was also previously recorded in the Carlton Oaks Golf Course area.

The records search and research identified one archaeological resource within the study area that had not been previously evaluated for CRHR eligibility: a Late Prehistoric/proto-historic village site (P-37-000204/CA-SDI-204).

The archaeological survey identified an additional pre-contact bedrock milling site in the study area (ICF-COak-S-01). The two previously untested and unevaluated archaeological sites in the study area had Phase 2 testing conducted during the current effort. Both resources were evaluated for CRHR eligibility. Newly recorded site ICF-COak-S-01 is recommended as not eligible for CRHR listing. Site P-37-000204/CA-SDI-204 is recommended as eligible for CRHR listing under Criterion 4.

Table 3.4-1. Previously Recorded Archaeological Resources Within 0.25 Miles of the Project Site

Primary Number	Trinomial	Type	Description	Recorder	Year	Inside Project Site	Outside Project Site
P-37-000140	P-37-000140	Prehistoric	No description, blank record	Treganza	None		X
P-37-000204	P-37-000204	Prehistoric	a. Not available. b. Not available. c. Bedrock milling site, lithic tool scatter d. Not relocated in the 2009 report. The record suggests incorrect coordinates and potential association with adjacent prehistoric habitation site SDI-09243 and SDI-00205.	a. Malcolm Rodgers b. Treganza c. Gallegos and Associates d. ASM Affiliates	a. unknown b. unknown c. 1992 d. 2009		X
P-37-000205	P-37-000205	Prehistoric	a. Subsurface lithic tool scatter locus associated with site W-200. b. Tested in 1986 and 1991. Neither excavation relocated the site. c. 1992 monitoring observed groundstone implements. d. Not relocated in the 2009 record. The record suggests incorrect coordinates and potential association with adjacent prehistoric habitation site SDI-09243 and SDI-00204.	a. Malcolm Rodgers b. Treganza c. Gallegos and Associates d. ASM Affiliates	a. unknown b. unknown c. 1992 d. 2009		X
P-37-000206	P-37-000206	Prehistoric	No description, blank record	Treganza	none		X
P-37-005050	P-37-005050	Prehistoric	A prehistoric habitation site including midden soils extending to a depth of at least 100 centimeters (cm) below surface grade. The report observed numerous milling features, fire affected rock, pottery, and flaked and groundstone artifacts over a 40- x	Roy Pettus	1979		X

Table 3.4-1. Previously Recorded Archaeological Resources Within 0.25 Miles of the Project Site

Primary Number	Trinomial	Type	Description	Recorder	Year	Inside Project Site	Outside Project Site
			130-meter area. A sketch map shows 17 or more basins, and 12 slicks on 13 separate boulders or outcrops. The record has not been updated since the original recording.				
P-37-005053	P-37-005053	Prehistoric	a. Observed several bedrock milling features. b. 1986 documented testing of 11 units and recorded 27 milling features including 59 slicks, 20 basins, and four cupules. A total of 1,224 artifacts including debitage, flaked and groundstone tools, sparse pottery, and one shell bead were collected from the surface and excavation units. The record also documented modern disturbance to the site which included refuse burning, construction, and terracing. Due to the disturbance and excavation, the site retains marginal integrity.	a. Roy Pettus b. Caltrans	a. 1979 b. 1986		X
P-37-008594	P-37-008594	Multicomponent	a. Documented site consisting of milling features and included one mortar used for red pigment manufacture. b. 1986 record documented two loci and recorded excavation of the site. Locus A had an associated midden deposit, and testing observed 312 artifacts, including debitage, flaked stone tools, and minimal pottery. The	a. C. and L. Christenson b. Caltrans c. Gallegos and Associates d. ASM Affiliates	a. 1981 b. 1986 c. 1992 d. 2009		X

Table 3.4-1. Previously Recorded Archaeological Resources Within 0.25 Miles of the Project Site

Primary Number	Trinomial	Type	Description	Recorder	Year	Inside Project Site	Outside Project Site
			record also noted that the site had been heavily disturbed by construction for flood control. Update c. 1992 identified flaked and groundstone artifacts, a bone tool, hammerstones, prehistoric pottery, and historic fragments dating to the 1920s. d. 2009 locus A was relocated. It was noted that several transient camps were located within the site.				
P-37-009242	P-37-009242	Prehistoric	a. Dense Lithic scatter b. Testing and observation elicited 601 historic artifacts and 2,465 prehistoric artifacts, which include debitage, flaked tools, projectile points, and worked bone. c. No cultural materials were observed.	a. A. Noah b. Caltrans c. Gallegos and Associates	a. 1982 b. 1986 c. 1992		X
P-37-009243	P-37-009243	Prehistoric	a. Milling features with quartz flakes. b. Not available. c. The 1984 record identified two loci of milling features and sparsely density of surface artifacts. Testing in 1985 observed >1,000 artifacts, which included flaked and groundstone tools, 40 projectile points, and faunal remains.	a. K. Hedges b. A. Noah c. Caltrans d. Ogden Environmental e. ASM Affiliates	a. 1978 b. 1982 c. 1984 d. 1992 e. 2009		X

Table 3.4-1. Previously Recorded Archaeological Resources Within 0.25 Miles of the Project Site

Primary Number	Trinomial	Type	Description	Recorder	Year	Inside Project Site	Outside Project Site
			d. Monitoring in 1992 recovered >1,000 artifacts, including hearth features and fragmented human remains. e. The 2009 update associated the site with the Malcolm Rogers site W-200, as a satellite village, with considerable subsurface deposits.				
P-37-010052	P-37-010052	Prehistoric	a. Several milling features and associated artifacts, including groundstone and pottery. b. Site record update.	a. S. Cupples b. S. Hector	a. 1974 b. 1988		X
P-37-010053	P-37-010053	Prehistoric	a. Lithic scatter covering a 60- x 20-meter area. b. Update. c. Update.	a. S. Cupples b. Carrico c. S. Hector	a. 1974 b. 1976 c. 1988		X
P-37-010148	P-37-010148	Prehistoric	a. Documented subsurface flaked and groundstone tools. b. Testing recorded sparse pottery, faunal material, flaked, and groundstone tools. c. Update documented disturbance of the area due to construction and observed no cultural materials.	a. Westec b. Westec c. ASM Affiliates	a. 1984 b. 1986 c. 2009		X
P-37-011057	P-37-011057	Prehistoric	a. Lithic artifact scatter observed within a 200- x 50-meter area. b. Recorded one milling feature, debitage, and fire affected rock within a 90- x 60-meter area.	a. Caltrans b. ERC Environmental c. Gallegos and Associates	a. 1988 b. 1990 c. 1992 and 1993		X

Table 3.4-1. Previously Recorded Archaeological Resources Within 0.25 Miles of the Project Site

Primary Number	Trinomial	Type	Description	Recorder	Year	Inside Project Site	Outside Project Site
			c. Updated the site to include two loci and conducted testing which recovered: charcoal, fire affected rock, and lithic materials of various types.				
P-37-013592	P-37-013592	Prehistoric	a. Light surface scatter of artifacts and minimal subsurface deposits. Primary artifact material type was lithic, which included flakes, scrapers, mano, chopper, and knife.	Brian F. Smith and Associates	1994		X
P-37-013593	P-37-013593	Prehistoric	a. Identified a light density lithic artifact scatter and conducted testing. b. 2011 update recorded that the site was destroyed due to the construction of a landfill.	a. Brian F. Smith and Associates b. Tetra Tech EC	a. 1994 b. 2011		X
P-37-014908	P-37-014908	Isolate	One unifacial core, possibly used as a scraper – collected.	Affinis	1989		X
P-37-014909	P-37-014909	Isolate	One utilized flake – collected.	Affinis	1989		X
P-37-030866	CA-SDI-19604	Site	Bedrock milling site containing two outcrops with six grinding surfaces.	ASM Affiliates	2009	X	
W-200		Site	Generalized boundary of an extensive habitation site consisting of three loci that appears to subsume P-37-030866, P-37-009243, P-37-000204, and P-37-000205.	a. Malcom Rodgers b. ERC Environmental c. Gallegos and Associates	a. ND (1940s–50s?) b. 1990 c. 1992	X	

P-37-030866/CA-SDI-19604

ASM Affiliates first recorded Site P-37-030866/CA-SDI-19604 in 2009 as a bedrock milling site consisting of two bedrock milling outcrops and six grinding surfaces. The site measures 10 by 10 meters, and no subsurface excavation was performed. The grinding surfaces consisted of a basin and a slick on the first bedrock outcrop and four slicks on the second outcrop. A third possible milling feature was observed nearby, but was not recorded. ASM Affiliates recorded this site as an independent resource, but through research, it was found to be part of P-37-000204/CA-SDI-204 and potentially part of the larger SDM-W-200 site that encompasses the area from Carlton Oaks Golf Course to the South Padre Mission Dam in Mission Trails.

P-37-000204/CA-SDI-204

Adan Treganza first recorded Site P-37-000204/CA-SDI-204 in the 1950s, providing no site information on the site form other than a site boundary. The site boundary is recorded at the SCIC as existing 40 meters north of the project site. Recon's 1988 report shows P-37-000204/CA-SDI-204 as a much larger site that encompasses P-37-030866/CA-SDI-19604 (Hector and Wade 1988). Although Recon did not re-locate this site, it provided a better site summary than the current site record at the SCIC. Recon believed that a portion of CA-SDI-204 may still exist under the Carlton Oaks Golf Course, but it was likely that extensive vandalism at the site and construction activities have largely destroyed it. Recon combined P-37-000204/CA-SDI-204 with SDM-W-200, which is a larger series of village sites (described below). For an unknown reason, the site boundary was decreased to the current boundary on file at the SCIC. ASM Affiliates updated this smaller site boundary in 2009, stating that it did not re-locate the site, but believed it to be either at the location of P-37-000205/CA-SDI-205, or as possibly site CA-SDI-9243, which is 50 meters west of P-37-000205/CA-SDI-205. ASM Affiliates did not record any new resources, and the 2009 recordation south of the San Diego River appears to be incorrect. Because P-37-030866/CA-SDI-19604 appears to be connected to an older site boundary associated with P-37-000204/CA-SDI-204, from here on, the site within the Carlton Oaks Golf Course that includes P-37-030866/CA-SDI-19604 will be referred to as P-37-000204/CA-SDI-204.

SDM-W-200 Description

Malcom Rogers first recorded Site SDM-W-200 as a large permanent village with at least three separate loci between Mission Dam and Carlton Oaks Golf Course. Locus A is believed to be south of the San Diego River and is now recorded as part of P-37-000205/CA-SDI-205. Loci B and C are believed to be near the Mission Dam. P-37-000204/CA-SDI-204 and P-37-030866/CA-SDI-19604 appear to be part of the larger SDM-W-200 site and possibly part of Locus A. The site is reported to be part of the location of the 1,000-year-old Kumeyaay village of *Senyaweché*, which comprised dispersed habitation sites. Features recorded in the larger SDM-W-200 site include cobble hearths, oxidized felsite tools, bedrock mortars and metates, and minimal shell. Recon in its 1988 report noted that County of San Diego archaeologist Anna Noah spoke with looters of the larger SDM-W-200 site who stated that the site was known and heavily impacted by many dedicated "treasure-hunters" during the early 1960s. These looters stated that this site yielded numerous cremations, some inhumations, Phoenix buttons, glass beads, bow pipes, a complete olla, arrow-shaft straighteners, and projectile points. The looter stated they would find and remove upward of 100 to 200 projectile points a day. This site designation has also been associated with sites CA-SDI-203 and CA-SDI-205, which, along with CA-SDI-204, may be loci of the larger SDM-W-200 site. One of the looters Anna Noah interviewed also stated that the area where CA-SDI-205 is located was not subjected to the same level of destruction as SDM-W-200.

Based on the results of current and past surveys, testing, and evaluations, resource P-37-000204/CA-SDI-204 is recommended eligible for CRHR listing under Criterion 4, which states that a resource that has the potential to yield

information important to an understanding of the prehistory of the nation, the state, or the local area would be eligible for such listing. Site P-37-000204/CA-SDI-204 contains a significant subsurface component, coupled with numerous diagnostic artifacts both on the surface and in the subsurface. The excavation associated with testing of this site for this project did not cover an adequate area to be considered a representative sample of the site. As such, further data recovery at the site would most likely yield more information on many topics associated with prehistoric sites in San Diego. For example, this site could potentially enhance our knowledge of lithic technology and subsistence along the San Diego River in the Late Prehistoric period in this region.

This site appears to be a prehistoric satellite village site that is part of a larger dispersed village pattern associated with all sites in the larger SDM-W-200 site boundary. Previous excavations at sites, such as CA-SDI-9243 by Mooney and Associates in 1994 and Ogden in 1994, found the area's occupation to date from the final phases of the Early Archaic period to the Late Prehistoric period (i.e., 5400 B.P. +/- 120 years to 375 B.P. +/- 50 years), but dates younger than approximately 1000 B.P. were not interpretable because of the apparently sporadic use of site CA-SDI-9243 after introduction of ceramics to the area (Brian F. Mooney Associates 1994; Carrico et al. 1994). Because CA-SDI-9243 is only 200 meters south of the updated site boundary for P-37-000204/CA-SDI-204, this date range is expected to be similar for both sites.

The variety of artifacts recovered in this excavation illustrates that a range of behaviors occurred at the site. Some of these items, such as bedrock milling and groundstone, may reflect daily subsistence activities at the site, but human remains were also recovered. Conversely, the large number of flakes compared to any other artifact at the site appears to point toward a final processing site for tools, especially considering that 59% of the flakes are microflakes associated with final lithic reduction. Most of the lithics appear to be locally sourced, but the presence of obsidian and chert gives evidence of travel or trade.

Although site integrity has been affected by grading, landscaping, and regular maintenance of the Carlton Oaks Golf Course, along with documented looting and bioturbation (i.e., the physical movement of soil by animals and plant roots), there appear to be areas of intact cultural stratigraphy below some of these disturbed layers. Soil profiles at the two test excavation units suggest extensive bioturbation, which would disturb the natural stratigraphy of the site and may displace artifacts.

Surveys at nearby sites, such as CA-SDI-9243, uncovered intact hearth features and larger amounts of groundstone during their data recovery efforts, which would be difficult to observe or recover in STPs. As such, further data recovery with additional 1-meter by 1-meter units where intact archaeological deposits remain may identify subsurface features, such as hearths and additional groundstone components, that may be difficult to identify in smaller testing holes.

Further studies, including full lithic analysis, faunal analysis, obsidian-hydration testing, and radiocarbon dating of charcoal, would provide a better understanding of this site's date range and use patterns.

This resource is not considered CRHR eligible under Criteria 1 through 3. The resource is not known to be directly associated with people or events that had a broad-reaching impact on the community at the national, state, or local level (Criteria 1 and 2), nor does it embody the characteristics of a distinctive type, period, or method of construction or represent the work of a master (Criterion 3).

Human Remains

Six testing locations recovered fragmented human remains within P-37-000204/CA-SDI-204. Once potential remains were observed, County of San Diego forensic anthropologist Dr. Madeleine Hinkes was contacted to determine whether they were human. Once she confirmed that they were human and likely of prehistoric age, she contacted the NAHC and gave them a report of the identified bone. The NAHC responded with information about the most likely descendant, determined to be the Kumeyaay Cultural Repatriation Committee, whose lead contact is Clint Linton. Clint Linton has been in contact over procedures concerning handling the remains, and a Native American monitor was in attendance for any other potential human remains identification by Dr. Hinkes. Locations and reports of the human remains are on file with the County Coroner and the NAHC. Correspondence and reports can be found in Confidential Appendix C of the *Cultural Resources Technical Report* (Appendix F).

ICF-COak-S-01

ICF-COak-S-01 consists of a prehistoric shell scatter in an approximately 10- by 10-meter area. Approximately 20 shell fragments were observed within the site boundary, including *Argopecten*, *Ostrea*, *Chione*, *Donax*, *Mytilus*, and *Tagelus* fragments. The site is approximately 60 meters south of Carlton Oaks Drive and 170 meters east of West Hills Parkway. Visibility was approximately 30% throughout the site due to seasonal and non-native ornamental grasses.

ICF-COak-S-01 is adjacent to a concrete drainage to the west and residential houses to the north, and their construction in the 1960s–1970s appears to have affected the site. Additionally, landscaping and general maintenance of the golf course has affected the site's integrity and artifact deposition. The site has, historically, been within an active floodplain of the San Diego River, which may have previously eroded the site.

As part of the Phase II testing to evaluate the site, an STP was excavated to a depth of 50 centimeters and was augered to 70 centimeters. The STP was negative for subsurface cultural material and contained modern trash, including polyvinyl chloride pipe, modern glass, and plastics throughout. Soils consisted of a sandy silt with water-worn cobbles and pebbles, and no soil changes were noted.

Based on the results of the survey and Phase II testing, resource ICF-COak-S-01 is not considered eligible for CRHR listing, nor is it considered a historical or unique archaeological resource under CEQA. Because no other artifacts were observed in the site boundary or surrounding area, the prehistoric shell scatter does not contain diagnostic artifacts. It appears to either be the result of older, mixed imported fill with potentially cultural shells or an opportunistic shell scatter. As a prehistoric sparse shell scatter, the site cannot be directly associated with people or events that had a broad-reaching impact on the community at the national, state, or local level (Criteria 1 and 2), nor does it embody the characteristics of a distinctive type, period, or method of construction or represent the work of a master (Criterion 3). Finally, as a sparse shell scatter with no observed subsurface components or other accompanying prehistoric artifacts, the resource does not have the potential to yield information important to an understanding of the prehistory or history of the nation, state, or local area (Criterion 4). Current testing and recording of the site have exhausted any further research potential.

3.4.2.5 Historic Built Environment

ICF historian/architectural historian Timothy Yates, PhD, and other staff surveyed the built environment study area for intact buildings and structures 45 years of age or older. Photographs of built environment resources identified within the study area were taken on June 18, 2019, and October 20, 2022.

Eight resources of historic age were identified within the built environment study area: (1) a potential Carlton Oaks Golf Course and Country Club historic district, (2) the Carlton Oaks Clubhouse, (3) the lodge, (4) four casitas (designed as one complex, and thus evaluated as one resource), (5) a single-family golf course manager's residence, (6) the golf course maintenance building, (7) the Carlton Oaks Golf Course itself, and (8) 9225 Inwood Drive.

The cultural resources technical study findings regarding the historic built environment resources are summarized here. After thorough evaluation, none of the eight built environment resources appear to qualify as historical resources for the purposes of CEQA. Table 3.4-2 lists the evaluated resources, the eligibility finding for each, and their California Historical Resources Information System status codes. All resources were assigned a 6Z status code, meaning that the resources were found ineligible for CRHR designation through survey evaluation. Architectural historians determined that the built environment resources do not have significant associations with an important import historical event or pattern of events; do not have direct association with the work or other activities for which any historically significant individuals are primarily known; do not have historic architectural or landscape design significance and do not represent the work of a master architect, landscape architect, or builder in an important way; and do not have potential to yield important historical information about mid-century construction or engineering techniques or materials. Detailed historic context statements applied as frameworks for evaluation of the identified built environment resources, and detailed CRHR evaluations of each resource, can be referenced in the *Cultural Resources Inventory and Evaluation Report* for the proposed project (Appendix F).

Table 3.4-2. Built Environment Survey and Evaluation Results

Resource	Year Built or Created	Eligibility	Historical Resource Status Code
Carlton Oaks Golf Course and Country Club Potential Historic District	1960–1971	—	—
Clubhouse	1963–1971	Not CRHR eligible	6Z
Lodge	1965	Not CRHR eligible	6Z
Casitas (four buildings)	1971	Not CRHR eligible	6Z
Residence	1971	Not CRHR eligible	6Z
Maintenance Building	1961	Not CRHR eligible	6Z
Carlton Oaks Golf Course	1960–1962	Not CRHR eligible	6Z
9225 Inwood Drive	1961	Not CRHR eligible	6Z

Notes: 6Z = Found ineligible for the National Register of Historic Places, CRHR, or local designation through survey evaluation; CRHR = California Register of Historical Resources.

3.4.2.6 Driving Range

In 2023, as part of the existing golf course's continued operations, soil extracted from another project was transported to the project site to create a berm to aid in golf ball retention. Approximately 1,000 cubic yards were moved to the existing driving range during a year-long period. A small bulldozer was used to spread the soil on the site's natural surface contours to create a berm along the outer edge of the driving range, adjacent to Sycamore Canyon Creek. No subsurface disturbance occurred as a result of the soil deposition.

On August 19, 2024, the City of Santee issued a Notice of Violation to the landowner of the project site. The Notice of Violation identified the transportation of the dirt to the driving range without the required permit as a violation of the City of Santee's Municipal Code. The applicant was directed to remove the transported dirt from the driving

range and restore the area to preconstruction conditions to the satisfaction of the City of Santee Engineer. The appropriate regulatory agencies were also informed of the potential violation and requested that any restoration be completed prior to the raptor season of 2025.

By the end of 2024, the soil and berm were removed, and the soil was transported off site. The driving range at the project site was returned to its existing topographic contours prior to the soil deposition. The remediation work involved removing the soil and berm from the driving range to restore the site to its original condition. The 1,000 cubic yards of soil was transported off site to a residential construction site located just north of Robertson Street and west of Day Street in the unincorporated town of Ramona approximately 25 miles away.

Although the potential remedial measures are not components of the currently proposed project, the City of Santee has requested that the Environmental Impact Report include information regarding these remedial measures for informational purposes. No subsurface disturbance occurred as a result of the soil deposition or subsequent removal; therefore, it is not anticipated that any cultural impacts occurred during either deposition or subsequent removal of the soil.

3.4.3 Applicable Laws and Regulations

3.4.3.1 State

California Environmental Quality Act

CEQA requires public agencies to evaluate the implications of their project on the environment, and includes significant historical resources as part of the *environment*. According to CEQA, a project that causes a substantial adverse change in the significance of a historical resource or an archaeological resource, including unique archaeological resources, has a significant effect on the environment (State CEQA Guidelines 15064.5; California Public Resources Code [PRC] Section 21083.2).

CEQA defines a *substantial adverse change* as follows:

- Physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired; or
- Demolition or material alteration of the physical characteristics that convey the resource's historical significance and justify its designation as a *historical resource*.

Public agencies must treat any cultural resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant (California Code of Regulations [CCR] Title 14 Section 15064.5). A cultural resource is considered significant if it meets the definition of *historical resource* or *unique archaeological resource*.

The term *historical resource* includes any object, building, structure, site, area, place, record, or manuscript that is historically or archaeologically significant or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (PRC Section 5020.1[j]). Historical resources may be designated as such through three different processes:

1. Official designation or recognition by a local government pursuant to local ordinance, or resolution (PRC Section 5020.1[k])
2. A local survey conducted pursuant to PRC Section 5024.1(g)
3. The property is listed in or eligible for listing in the National Register of Historic Places or listed in the California Register of Historical Resources (PRC Section 5024.1[d][1])

Public Resources Code Section 5024.1 (California Register of Historic Resources)

The process for identifying historical resources is typically accomplished by applying the criteria for listing in the CRHR (14 CCR 4852), which states that a historical resource must be significant at the local, state, or national level under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. It is associated with the lives of persons important in our past.
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.
4. It has yielded, or may be likely to yield, information important in prehistory or history.

To be considered a *historical resource* for the purposes of CEQA, the resource must also have *integrity*, which is the authenticity of a resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance.

Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is eligible for listing in the CRHR (14 CCR 4852[c]).

Public Resources Code Section 5097

PRC Section 5097 addresses archaeological, paleontological, and historic sites on state land, as well as the cooperative efforts with the NAHC that are to be undertaken as part of a project being evaluated under CEQA. PRC Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on non-federal public lands. PRC Section 5097.5 considers it a misdemeanor to knowingly and willfully excavate on or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, or archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological, or historical feature situated on public lands, except with the express permission of the public agency having jurisdiction over the lands. The disposition of Native American burials falls within the jurisdiction of the NAHC, which prohibits willfully damaging any historic, archaeological, or vertebrate paleontological site or feature on public lands (PRC Section 5097.9). PRC Section 5097.98 stipulates that whenever the NAHC receives notification of a discovery of Native American human remains from the County

Coroner, it must immediately notify those people it believes to be the most likely descendants of the deceased Native American. The descendants may inspect the site of discovery and make recommendations on the removal or reburial of the remains.

Health and Safety Code Section 7050.5

Health and Safety Code Section 7050.5 addresses the protection of human remains discovered in any location other than a dedicated cemetery, and makes it a misdemeanor for any person to knowingly mutilate or disinter, wantonly disturb, or willfully remove any human remains in or from any location other than a dedicated cemetery without authority of law, except as provided in PRC Section 5097.99. It further states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there must be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to their authorized representative, in the manner provided in PRC Section 5097.98. If the County Coroner determines that the remains are not subject to their authority, and if the County Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, they must contact the NAHC by telephone within 24 hours of the discovery.

Assembly Bill 52 (Chapter 532, Statute of 2014)

Assembly Bill (AB) 52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California Native American tribes as part of CEQA, and establishes that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (PRC Section 21084.2). PRC Section 21074 defines *tribal cultural resources* as follows:

- Sites, features, places, sacred places, and objects with cultural value to descendant communities or cultural landscapes defined in size and scope that are:
 - Included in or eligible for listing in the CRHR; or,
 - Included in a local register of historical resources.
- 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 PRC Section 5024.1.

Sacred places can include Native American sanctified cemeteries, places of worship, religious or ceremonial sites, and sacred shrines. In addition, both unique and nonunique archaeological resources, as defined in PRC Section 21083.2, can be tribal cultural resources if they meet the criteria detailed above. The lead agency relies on substantial evidence to make the determination that a resource qualifies as a tribal cultural resource when it is not already listed in the CRHR or a local register.

Senate Bill 18

SB 18 (Chapter 905, Statutes of 2004) requires local (i.e., city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning. As identified in the state's Tribal Consultation Guidelines, the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage for the purpose of protecting,

or mitigating impacts to, cultural places. SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both General Plans (defined in Government Code Section 65300 et seq.) and Specific Plans (defined in Government Code Section 65450 et seq.). However, SB 18 does not apply to the current project because the project is not amending a General Plan or Specific Plan, nor designating land as open space.

California Government Code Sections 6254(r) and 6254.10

California Government Code Section 6254(r) and California Public Records Act Section 6254.10 were enacted to protect archaeological sites from unauthorized excavation, looting, and vandalism. California Government Code Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to “Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission.” California Public Records Act Section 6254.10 specifically exempts from disclosure requests for the following:

Records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency.

3.4.3.2 Local

City of Santee General Plan

The *City of Santee General Plan* addresses cultural resources under its *Conservation Element* (City of Santee 2003). The goal of the *Conservation Element* is to conserve open space and natural and cultural resources. Objective 8.0 of the *Conservation Element* is to preserve significant cultural resources through the implementation of the following policies:

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.

Policy 8.2. The City should require curation of any recovered artifacts as a condition of any cultural resources mitigation program.

Additionally, the City of Santee must use the environmental review process to identify, conserve, and enhance unique natural, biological, and cultural resources to ensure the preservation of significant natural resources and features; regulate and condition development within areas susceptible to natural hazards; and ensure the preservation of significant biological resources, historical resources, and archaeological sites.

City of San Diego General Plan

The *City of San Diego General Plan* addresses cultural resources under the *Historic Preservation Element* (City of San Diego 2008), which guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources as follows:

HP-A.4. Actively pursue a program to identify, document and evaluate the historical and cultural resources in the City of San Diego.

- a. Develop context statements specific to areas being surveyed.
- b. Complete and regularly update a comprehensive citywide inventory of historical and cultural resources in conformance with state standards and procedures. Include community, neighborhood, cultural, and historic preservation groups, property owners, land developers, and the building industry in planning and implementing historic surveys.
- c. Require that archaeological investigations be guided by appropriate research designs and analytical approaches to allow recovery of important prehistoric and historic information.
- d. Require the permanent curation of archaeological artifact collections and associated research materials, including collections held by the City. Support the permanent archiving of primary historical records and documents now in public institutions.
- e. Include Native American monitors during all phases of the investigation of archaeological resources including survey, testing, evaluation, data recovery, and construction monitoring.
- f. Treat with respect and dignity any human remains discovered during implementation of public and private projects within the City and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.

3.4.4 Project Impacts Analysis

3.4.4.1 Methodology

Impacts on historical and archaeological resources are determined based on the sensitivity or significance of identified resources and the direct and indirect impacts that would result from implementation of the project. If direct or indirect impacts on significant historical or archaeological resources were to occur, then mitigation measures would be required.

Criteria to determine the significance of historical resources are summarized in Section 3.4.3, Applicable Laws and Regulations. Physical effects on historical resources typically include direct disturbance and/or destruction of a resource and occur during construction. Aesthetic effects on historical resources typically consist of indirect impacts, such as changes to the visual or auditory landscape. The demolition or substantial alteration of a historical resource would constitute a significant impact.

For archaeological resources, potential impacts could occur for reasonably foreseeable future development projects that result in disturbance and/or destruction of previously recorded and/or undiscovered archaeological resources. The disturbance and/or destruction of archaeological resources would be a significant impact. Impacts on existing religious or sacred uses, including buried human remains, include direct disturbance and/or destruction of historical resources that have religious or sacred value, or indirect impacts on the visual or auditory landscape,

such as the construction of a building that blocks the view of an important landmark, or use of operational equipment that consistently produces noise. Any direct or indirect impact on religious or sacred uses or human remains would be a significant impact.

3.4.4.2 Thresholds of Significance

The following significance criteria are based on State CEQA Guidelines Appendix G and provide the basis for determining the significance of impacts associated with cultural resources. A *significant historic resource* is one that qualifies for CRHR listing or is listed in a local historic register or deemed significant in a historical resource survey, as provided under PRC Section 5024.1(g). A resource that is not listed in, nor determined to be eligible for listing in, the CRHR; not included in a local register of historic resources; or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA. Impacts associated with cultural and tribal resources would be significant if the proposed project would result in any of the following:

1. Cause a substantial adverse change in the significance of a historical or archaeological resource as defined in PRC Section 15064.5.
2. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
3. Disturb any human remains, including those interred outside of formal cemeteries.
4. Cause a substantial adverse change in the significance of a tribal cultural resource defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - a. Listed or eligible for listing in the CRHR, or in a local register of historic resources as defined in PRC Section 5020.1(k), or
 - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). In applying the criteria set forth in PRC Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.

According to CEQA, a project that causes a substantial adverse change in the significance of a historical resource or a unique archaeological resource has a significant effect on the environment (14 CCR 15064.5; PRC Section 21083.2). CEQA defines a *substantial adverse change* as follows (14 CCR 15064.5[b]):

- Physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired; or
- 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 CRHR; or
- 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 resource 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

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by the lead agency.

3.4.5 Project Impacts and Mitigation Measures

Threshold 1 (Historical Resources): Would the proposed project cause a substantial adverse change in the significance of a historical or archaeological resource, as defined in State CEQA Guidelines Section 15064.5?

Impact Discussion

Eight resources of historic age were identified within the built environment study area: (1) a potential Carlton Oaks Golf Course and Country Club historic district, (2) the Carlton Oaks Clubhouse, (3) the lodge, (4) four casitas (designed as one complex, and thus evaluated as one resource), (5) a single-family golf course manager's residence, (6) the golf course maintenance building, (7) the Carlton Oaks Golf Course itself, and (8) 9225 Inwood Drive. Professionally qualified architectural historians recorded and evaluated each of these resources for historic significance against CRHR significance criteria and determined that none of these resources are eligible for CRHR listing (Appendix F). Thus, none of the eight resources are considered historic resources for the purposes of CEQA.

In the off-site improvement areas, utility work would occur at two private properties. An existing wooden utility pole along Carlton Oaks Drive would be relocated from a narrow parkway strip within the right-of-way to the far southeastern corner of 8726 Carlton Oaks Drive, and communication lines would be refeed to the same location at the residence. The utility pole work would not alter the setting of this property because this residence faces numerous existing utility poles that are visible along Carlton Oaks Drive. Additionally, project-related changes to electricity transformers and poles would require replacement of the feed line at 8713 Carlton Oaks Drive. The replacement line would be refeed in the same location as the existing line at 8713 Carlton Oaks Drive and would not alter the appearance of the residences in any way. For this reason, the built environment survey did not include 8713 and 8726 Carlton Oaks Drive.

Impact Determination

Because the built resources evaluation determined that the project site does not contain any historical resources, alterations to the Carlton Oaks Golf Course and Country Club and 9225 Inwood Drive caused by the proposed project would not result in any impacts on historical resources.

Mitigation Measures

The proposed project would not result in any impacts on historical resources. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

No impacts would occur; no mitigation is required.

Threshold 2 (Archaeological Resources): Would the proposed project cause a substantial adverse change in the significance of an archaeological resource as defined in State CEQA Guidelines Section 15064.5?

Impact Discussion

The technical study for the proposed project identified two prehistoric archaeological resources within the study area: P-37-000204/CA-SDI-204 and ICF-COak-S-01. Prehistoric P-37-000204/CA-SDI-204 was previously recorded north of the study area, but was later confirmed through research to subsume P-37-030866/CA-SDI-19604, which was previously separately recorded within the study area. P-37-000204/CA-SDI-204 also appears to be associated with the larger SDM-W-200 site, which encompasses an unknown swath of land from Carlton Oaks Golf Course to the South Padre Mission Dam along the San Diego River. Professionally qualified archaeologists recorded and evaluated each of these resources for historic significance against CRHR significance criteria and determined that P-37-000204/CA-SDI-204 is eligible for CRHR listing under Criterion 4. Resource ICF-COak-S-01 was evaluated and considered not significant nor eligible for the CRHR and for the purposes of CEQA. The prehistoric shell scatter does not contain diagnostic artifacts. It appears to either be the result of older, mixed imported fill with potentially cultural shells or an opportunistic shell scatter, because no other artifacts were observed in the site boundary or surrounding area. As a sparse shell scatter with no observed subsurface components or other accompanying prehistoric artifacts, the resource does not have the potential to yield information important to an understanding of the prehistory or history of the local area, the state, or the nation. Current testing and recording of the site have exhausted any further research potential.

Although ground disturbance within CRHR-eligible P-37-000204/CA-SDI-204 has been avoided wherever possible, the proposed project would require ground disturbance for four stormwater diversion features, which could have a significant impact on a cultural resource.

The project could also affect previously unknown buried archaeological resources. Although the number of prehistoric archaeological resources recorded in this area and within 1 mile suggests prehistoric use, this area is covered with alluvial deposits from San Diego River that have accumulated over the course of known human occupation in the region. These alluvial deposits may have capped existing intact cultural lenses. Additionally, given the level of water and wind scouring in this area, as evidenced by historic aerials, there is a possibility that the deposition and movement of alluvium by water and wind has buried prehistoric archaeological sites that once existed on the surface. This is supported by the presence of artifacts from the Phase II testing at P-37-000204/CA-SDI-204. Even so, the project would have potentially significant impacts on historical resources (**Impact CUL-1**).

Impact Determination

Impact CUL-1: Potential to Impact Archaeological Resources.

Although no artifacts were observed on the surface of much of the study area, the possibility exists for buried archaeological deposits to be encountered during project-related excavation. In the event that unknown archaeological resources that qualify as historical resources or unique archaeological resources are discovered during project construction, significant impacts could occur.

Mitigation Measures

To avoid impacts, archaeological and Native American monitoring of the project site during ground-disturbing activities—including monitoring all ground-disturbing activities within 250 feet of P-37-000204/CA-SDI-204—would

be conducted. Preservation in place can be achieved by project design for avoidance, capping of the site, or full data recovery excavations restricted to the parts of the site that would be damaged or destroyed by the project. As such, creating a Monitoring and Discovery Plan would be necessary before construction occurs. Should any part of the intact portion of P-37-000204/CA-SDI-204 be affected by ground disturbance, then creation of a Data Recovery Plan also would be necessary before any construction occurs, including the proposed installation of storm drains within the boundaries of P-37-000204/CA-SDI-204. Therefore, an Archaeological Data Recovery Plan and implementation of data recovery efforts to mitigate the impacts of construction would be necessary before construction-related ground disturbance within the site boundaries can occur. The following mitigation measures (MMs) would be implemented for **Impact CUL-1**:

MM-CUL-1. Retention of Qualified Archaeologist. Prior to the start of any ground-disturbing activity, provide evidence to the City of Santee that a Qualified Archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology has been contracted by the Applicant to implement the Archaeological Monitoring program and carry out all mitigation measures related to archaeological resources.

Within 60 days after construction is complete, the qualified archaeologist will prepare and submit to the City of Santee for review a final monitoring report that will discuss the monitoring program, its results, and approval and provide interpretations about the recovered materials, noting, to the extent feasible, each item's class, material, function, and origin. Any new cultural sites or features encountered will be recorded with the SCIC at San Diego State University.

MM-CUL-2. Preconstruction Cultural Resources Sensitivity Training. Prior to the approval of grading permits, a qualified archaeologist will prepare cultural resources sensitive training materials for use during project-wide Worker Environmental Awareness Training (or equivalent). The cultural resources sensitivity training will be conducted by a qualified environmental trainer working under the supervision of a qualified archaeologist. The qualified archaeologist will determine and ensure the suitability of the qualified environmental trainer. The cultural resources sensitivity training will be conducted for all construction personnel. Construction personnel will be informed of the types of archaeological resources that may be encountered and the proper procedures to be implemented in the event of an inadvertent discovery of archaeological resources or human remains. The City of Santee will ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

MM-CUL-3. Installation of Exclusionary Signage. Prior to the approval of grading permits, exclusionary temporary environmentally sensitive area signage will be installed to ensure that Site P-37-000204/CA-SDI-204 is not inadvertently affected during project construction. The exclusionary signage will encompass the mapped site boundary and be spaced no more than 20 feet apart; in order to discourage unauthorized disturbance, vandalism, or collection of artifacts, signage will not identify the protected areas as demarcating archaeological resources. Work within the delineated area will be limited to no new ground disturbance within the mapped boundaries of Site P-37-000204/CA-SDI-204 outside of approved areas where data recovery will be performed.

MM-CUL-4. Capping Site P-37-000204/CA-SDI-204. Avoidance of impacts to archaeological site P-37-000204/CA-SDI-204 will be conducted through a combination of site-capping and avoidance, where feasible within the site boundaries. Prior to approval of grading permits, a site-capping plan will be prepared by a qualified archaeologist who meets or exceeds the Secretary of Interior's

Professional Qualifications Standards for archaeology. The plan will be reviewed and approved by the Project Director for the City of Santee with input from Native American tribal groups who have consulted on the project. The plan will include the following steps:

- To ensure that potential archaeological deposits remain intact, proposed work within the site boundary will require capping of the site that includes placing a geotextile fabric across the existing ground surface and covering that ground surface with a layer of clean fill where project components are proposed and/or placing ground-protecting mats in areas of ingress and egress within the site.
- The exception to this will be the new storm drains, which, by the nature of their design, cannot be installed aboveground; data recovery will be conducted within the ground disturbance footprint.
- Any proposed grading will only occur within new fill.
- This mitigation measure will not apply to non-project-related routine maintenance and operations activities that are regularly conducted for the golf course.

MM-CUL-5. Development and Implementation of Cultural Resources Monitoring Plan. Prior to the start of any project-related ground-disturbing activities or issuance of grading permits, a qualified archaeologist will prepare a Cultural Resources Monitoring Plan (CRMP) that will stipulate the location and timing of archaeological and Native American monitoring, including, but not limited to, the monitoring of all ground-disturbing activities within 250 feet of P-37-000204/CA-SDI-204.

The CRMP will include monitoring protocols to be carried out during project construction and stipulate that a Native American monitor associated with one or more of the Native American groups that have expressed interest in the project be retained to monitor all project-related ground disturbance stipulated in the CRMP. In preparing the CRMP, the Native American groups that have expressed interest in monitoring will be consulted regarding monitor scheduling, and a Native American-monitoring schedule will be incorporated into the CRMP. The CRMP will contain an allowance that a qualified archaeologist, based on observations of subsurface soil stratigraphy or other factors during initial grading, and in coordination with the Native American monitor(s) and the City of Santee, may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering archaeological deposits is low.

The plan will outline the appropriate measures to be followed in the event of an unanticipated discovery of cultural resources during project implementation, including that all ground disturbance within 100 feet of an unanticipated discovery will cease until a treatment plan is developed by a qualified archaeologist in coordination with the City of Santee and the Native American monitor(s) that will consider the resources archaeological and tribal value. The CRMP will identify avoidance as the preferred manner of mitigating impacts to cultural resources. The plan will establish the criteria utilized to evaluate the significance (per CEQA) of the discoveries, methods of avoidance consistent with CEQA Guidelines Section 15126.4(b)(3), as well as identify the appropriate treatment to mitigate the effect of the project if avoidance of a significant resources is determined to be infeasible. The CRMP will also include provisions for the treatment of archaeological sites that qualify as unique archaeological resources pursuant to PRC Section 21083.2, which places limits on the costs of mitigation for unique archaeological resources. The plan will also include reporting of monitoring results within a timely manner, curation of artifacts and data at an approved

facility, and dissemination of reports to local and state repositories. The CRMP will be submitted to the City of Santee for review and approval prior to approval of grading permits, as well as to the Native American groups that have expressed interest in the proposed project for review and comment.

MM-CUL-6. Development and Implementation of a Data Recovery Plan. Where avoidance and or site-capping is infeasible, or if any part of the intact portion of Site P-37-000204/CA-SDI-204 is affected by ground disturbance, or if the City of Santee, in coordination with the qualified archaeologist, determines that an unanticipated discovery is a historical resource, and data recovery is the only feasible mitigation, then an archaeological Data Recovery Plan (DRP) will be designed and implemented to record and remove scientifically important data that would otherwise be destroyed through construction-related ground disturbance, per CEQA Guidelines 15126.4(b)(3)(C). The DRP will include historic context, research design, expected feature types, data recovery thresholds, data recovery field and laboratory methods, the artifact-disposition policy, and reporting requirements.

The DRP and data recovery fieldwork will be completed prior to the start of or resumption of project construction. After the archaeological data recovery fieldwork is complete, the qualified archaeologist will prepare an archaeological Data Recovery Report that conforms with the California Office of Historic Preservation's recommended contents and format for cultural resources reports. The report will be submitted to the City of Santee for review; on the City of Santee's determination that the report is satisfactory, it will be repositied at the SCIC. Any artifacts collected during data recovery will be curated at the San Diego Archaeological Center, at the project proponent's expense. This report will be deemed acceptable by the City of Santee prior to any project-related ground-disturbing activities or issuance of grading permits. In cases of unanticipated cultural resource discoveries requiring data recovery, data recovery work and the report will be deemed acceptable by the City of Santee prior to the resumption of construction activities within the potentially impacted portion of the resource.

Level of Significance After Mitigation

With implementation of the proposed mitigation measures, potential impacts to cultural resources would be less than significant.

Threshold 3 (Human Remains): Would implementation of the proposed project disturb human remains, including those interred outside of formal cemeteries?

Impact Discussion

Because human remains were observed both on the ground surface and within the subsurface of P- 37-000204/CA-SDI-204, there exists the possibility for additional buried or surface human remains to be encountered during project-related excavation.

Although ground disturbance within P-37-000204/CA-SDI-204 would be avoided wherever possible, the proposed project would require ground disturbance for four stormwater diversion features that could have a significant impact on human remains. The project site is covered with alluvial deposits from the San Diego River that have accumulated over the course of known human occupation in the region. These alluvial deposits may have capped existing intact cultural lenses that contain human remains. Additionally, given the level of water and wind scouring in this area, as

evidenced by historic aeriels, there is a possibility that the deposition and movement of alluvium by water and wind has buried prehistoric remains that once existed on the surface. This is supported by the presence of artifacts and human remains from the Phase II testing at P-37-000204/CA-SDI-204. Therefore, the proposed project would have potentially significant impacts on human remains (**Impact CUL-2**).

Impact Determination

Impact CUL-2: Potential to Impact Unknown Human Remains.

In the event that unknown human remains are discovered during project construction, significant impacts could occur.

Mitigation Measures

To avoid impacts, archaeological and Native American monitoring of the project site will occur, including the monitoring of all ground-disturbing activities within 250 feet of P-37-000204/CA-SDI-204. As such, a Monitoring and Discovery Plan (**MM-CUL-5**) would be necessary before construction occurs. Should any part of the intact portion of P-37-000204/CA-SDI-204 be affected by ground disturbance, then creation of a Cultural Resources Monitoring Plan that includes methods and actions for the proper treatment of human remains would be necessary before any construction occurs, including the proposed installation of storm drains within the boundaries of P-37-000204/CA-SDI-204. Additionally, an Archaeological Data Recovery Plan (**MM-CUL-6**) and implementation of data recovery efforts to mitigate the impacts of construction on potential human remains would be necessary before construction-related ground disturbance within the site boundaries can occur. In addition to **MM-CUL-5** and **MM-CUL-6**, implementation of **MM-CUL-7** would be required.

MM-CUL-7. Contact Authorities if Human Remains Are Encountered. Human remains are known to be located in the proposed project area. Should additional human remains be found within the project beyond those already identified in this report, their location will be incorporated into P-37-000204/CA-SDI-204. California Health and Safety Code Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains and that no further disturbance occur until the County Coroner has made a determination of origin and disposition, pursuant to PRC Section 5097.98. If the remains are determined to be Native American, then the County Coroner must contact the NAHC, which will assign a Most Likely Descendant. Per PRC Section 5097.98(b), the landowner will confer with the Most Likely Descendant about all reasonable options regarding the disposition of the remains. In addition, according to California Health and Safety Code, six or more human burials at one location constitutes a cemetery (California Health and Safety Code § 8100), and disturbance of Native American cemeteries is a felony (California Health and Safety Code § 7052). Although there are known human remains in the project area, with the implementation of mitigation measures, the project will avoid potentially significant impacts on human remains. Public Resources Code Section 5097.98, CEQA Section 15064.5, and Health & Safety Code Section 7050.5 will be followed in the event that human remains are discovered.

Level of Significance After Mitigation

With implementation of the proposed mitigation measures, potential impacts to cultural resources would be less than significant.

Threshold 4 (Tribal Cultural Resources): *Would implementation of the proposed project cause a substantial adverse change in the significance of a tribal cultural resource defined in section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historic resources as defined in section 5020.1(k); or (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in section 5024.1(c)? In applying the criteria set forth in section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.*

Impact Discussion

Although, no tribal cultural resources have been identified to date by the NAHC or through outreach with contacted local tribes, the technical study for the proposed project (Appendix F) identified one prehistoric archaeological resource within the study area, P-37-000204/CA-SDI-204, that may be a potential tribal cultural resource. Prehistoric site P-37-000204/CA-SDI-204 was previously recorded north of the study area, but was later confirmed through research to subsume P-37-030866/CA-SDI-19604, which was previously separately recorded within the study area. P-37-000204/CA-SDI-204 also appears to be associated with the larger SDM-W-200 site, which encompasses an unknown swath of land from the Carlton Oaks Golf Course to the South Padre Mission Dam along the San Diego River and is believed to be the location of the Kumeyaay village site of *Senyaweché*. Professionally qualified archaeologists recorded and evaluated each of these resources for historical significance against CRHR significance criteria and determined that P-37-000204/CA-SDI-204 is CRHR eligible and could potentially be determined to be a tribal cultural resource.

Although ground disturbance within CRHR-eligible P-37-000204/CA-SDI-204 has been avoided wherever possible, the proposed project would require ground disturbance for four stormwater diversion features, which could have a significant impact on tribal cultural resources, should they be present.

The proposed project could also affect previously unknown buried archaeological resources. Although the number of prehistoric archaeological resources recorded in this area and within 1 mile suggests prehistoric use, this area is covered with alluvial deposits from the San Diego River that have accumulated over the course of known human occupation in the region. These alluvial deposits may have capped existing, intact cultural lenses. Additionally, given the level of water and wind scouring in this area, as evidenced by historic aerials, there exists the possibility that the deposition and movement of alluvium by water and wind has buried prehistoric archaeological sites that once existed on the surface and may be tribal cultural resources. This is supported by the presence of artifacts from the Phase II testing at P-37-000204/CA-SDI-204. Although no artifacts were observed on the surface of much of the study area, there is a possibility for buried tribal cultural resources to be encountered during project-related excavation. In the event that unknown archaeological resources that qualify as tribal cultural resources are discovered during project construction, significant impacts could occur (**Impact TCR-1**).

Impact Determination

Impact TRC-1: Potential to Impact Tribal Cultural Resources.

The proposed project would require ground disturbance for four stormwater diversion features in CRHR-eligible P-37-000204/CA-SDI-204, which could have a significant impact on tribal cultural resources, should they be present. Additionally, there is the potential for unknown archaeological resources that qualify as tribal cultural resources to be discovered during project construction, which could result in a significant impact.

Mitigation Measures

To avoid such impacts, archaeological and Native American monitoring of the project site would occur, including monitoring all ground-disturbing activities within 250 feet of P-37-000204/CA-SDI-204. Proposed **MM-CUL-1** through **MM-CUL-7**, listed above, would be implemented for **Impact TRC-1**. As such, creation of a Monitoring and Discovery Plan is necessary before construction occurs. Should any part of the intact portion of P-37-000204/CA-SDI-204 be affected by ground disturbance, then development of a Data Recovery Plan is also necessary before any construction occurs. This includes the proposed installation of storm drains within the boundaries of P-37-000204/CA-SDI-204. Therefore, an archaeological Data Recovery Plan and implementation of data recovery efforts to mitigate the impacts of construction would be necessary before construction-related ground disturbance within the site boundaries can occur.

Level of Significance After Mitigation

With implementation of **MM-CUL-1** through **MM-CUL-7**, potential impacts to tribal cultural resources (**Impact TRC-1**) would be less than significant.

3.4.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1 (Historical Resources): Would the proposed project cause a substantial adverse change in the significance of a historical or archaeological resource, as defined in State CEQA Guidelines Section 15064.5?

None of the built environment resources of historic age identified within the study area qualify as historical resources under CEQA. Therefore, the project would have no cumulative impacts on built environment historical resources.

Cumulative Threshold 2 (Archaeological Resources): Would the proposed project cause a substantial adverse change in the significance of an archaeological resource as defined in State CEQA Guidelines Section 15064.5?

One prehistoric archaeological resource that qualifies as a historical resource under CEQA was identified within the study area. The proposed project would have a potentially significant impact on this resource before mitigation. Additional projects unrelated to the current study and outside of the project site could have significant impacts on historical resources, and the proposed project's impacts could have a cumulative impact when combined with other projects. However, with the proposed mitigation measures, the impacts would be reduced to a less-than-significant level. The proposed project's incremental contribution to cumulative impacts on archaeological resources would not be cumulatively considerable, and impacts would be less than significant.

Cumulative Threshold 3 (Human Remains): Would implementation of the proposed project disturb human remains, including those interred outside of formal cemeteries?

Prehistoric human remains have been identified within the study area. Without mitigation, the project would have a potentially significant impact on these human remains. Additional projects unrelated to the current study and outside of the project site could have significant impacts on human remains, and the proposed project's impacts could have a cumulative impact when combined with other projects. However, with implementation of the proposed mitigation measures, the impacts would be reduced to a less-than-significant level. The proposed project's incremental contribution to cumulative impacts on human remains would not be cumulatively considerable and would be less than significant.

Cumulative Threshold 4 (Tribal Cultural Resources): *Would implementation of the proposed project cause a substantial adverse change in the significance of a tribal cultural resource defined in section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historic resources as defined in section 5020.1(k); or (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in section 5024.1(c)? In applying the criteria set forth in section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.*

To date, no tribal cultural resources have been identified by the NAHC or through outreach with contacted local tribes. However, one prehistoric archaeological resource that could be determined to be a tribal cultural resource under CEQA was identified in the study area. Without mitigation, the proposed project would have a potentially significant impact on this resource. Additional projects unrelated to the current study and outside of the project site also could have significant impacts on tribal cultural resources, and the proposed project's impacts could have a cumulative impact when combined with other projects. However, with implementation of the proposed mitigation measures, the impacts would be reduced to a less-than-significant level. The proposed project's incremental contribution to cumulative impacts on tribal cultural resources would not be cumulatively considerable and would be less than significant.

3.4.7 Summary of Significant Impacts

Table 3.4-3 provides a summary of the project's significant cultural resources impacts and any necessary mitigation measures.

Table 3.4-3. Summary of Significant Cultural Resources Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact CUL-1: Potential to Affect Archaeological Resources	<ul style="list-style-type: none">▪ MM-CUL-1. Retention of Qualified Archaeologist▪ MM-CUL-2. Preconstruction Cultural Resources Sensitivity Training▪ MM-CUL-3. Install Exclusionary Signage▪ MM-CUL-4. Capping Site P-37-000204/CA-SDI-204▪ MM-CUL-5. Development and Implementation of Cultural Resources Monitoring Plan▪ MM-CUL-6. Development and Implementation of a Data Recovery Plan	Less than significant	Implementation of the mitigation measures would ensure proper training and treatment of significant archaeological resources, including stopping work when archaeological resources are encountered, preparation of plans for unanticipated discoveries, and monitoring by archaeological and Native American monitors.

Table 3.4-3. Summary of Significant Cultural Resources Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact CUL-2: Potential to Affect Unknown Human Remains	<ul style="list-style-type: none"> ▪ MM-CUL-5 and MM-CUL-6 ▪ MM-CUL-7. Contact Authorities if Human Remains Are Encountered 	Less than significant	Implementation of the mitigation measures would stop work if remains were found and require calling the County Coroner when human remains are encountered, thus ensuring as little disturbance as possible.
Impact TCR-1: Potential to Impact Tribal Cultural Resources	MM-CUL-1 through MM-CUL-7	Less than significant	Implementation of the mitigation measures would ensure proper training and treatment of significant archaeological resources, including stopping work when archaeological resources are encountered, preparation of plans for unanticipated discoveries, and monitoring by archaeological and Native American monitors.

3.4.8 References

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3.5 Energy

3.5.1 Overview

This section describes the existing setting for energy and the applicable regulations that govern energy use, supply, distribution, and performance. This section also discusses the proposed Carlton Oaks Country Club and Resort Project's (project) potential to result in impacts associated with energy use. Information in this section is based on the following:

- **Carlton Oaks Country Club and Resort Greenhouse Gas Assessment** completed by Ldn Consulting, January 31, 2025 (Appendix C1)
- **Construction modeling in the Carlton Oaks Country Club and Resort Air Quality Assessment** completed by Ldn Consulting, January 31, 2025 (Appendix B1)
- **Carlton Oaks Country Club and Resort Energy Assessment** prepared by Ldn Consulting, January 31, 2025 (Appendix C2)
- **Carlton Oaks Country Club Driving Range Remediation Memorandum** prepared by Ldn Consulting Inc., October 21, 2024 (Appendix B2)

3.5.2 Environmental Setting

The existing development consists of a 145-acre 18-hole golf course, clubhouse, pool, restaurant, and golf amenities—such as a pro-shop and driving range—as well as multiple sheds and a maintenance building. In addition, the existing development has a 43-unit hotel and 9 single-story casitas that look like residential units. Combined, the hotel and casitas operate as a 52-unit hotel. The existing hardscape is approximately 106,000 square feet, making up the on-site parking and roadways. The existing golf course has roots dating back to the 1950s and was last renovated in 1989. San Diego Gas and Electric (SDG&E) currently provides electricity and natural gas at the project site.

3.5.2.1 Driving Range Remedial Work

In 2023 as part of the existing golf course's continued operations, soil extracted from another project was transported to the project site to create a berm to aid in golf ball retention. In total, approximately 1,000 cubic yards were moved to the existing driving range during a year-long period. A small bulldozer was used to spread the soil on the site's natural surface contours to create a berm along the outer edge of the driving range, adjacent to Sycamore Canyon Creek. No subsurface disturbance occurred as a result of the soil deposition.

On August 19, 2024, the City of Santee issued a Notice of Violation to the landowner of the project site. The Notice of Violation stated that the transportation of the dirt to the driving range without the required permit was a violation of the City of Santee's Municipal Code. The landowner was directed to remove the transported dirt from the driving range and restore the area to preconstruction conditions to the satisfaction of the City of Santee Engineer. The appropriate regulatory agencies were also informed of the potential violation, and it was requested that any restoration be completed prior to the raptor season of 2025.

By the end of 2024, the soil and berm were removed, and the soil was transported off site. The topographic contours at the driving range were returned to its conditions prior to the soil deposition. The remediation work involved removing the soil and berm from the driving range to restore the site to its original condition. The 1,000

cubic yards of soil was transported off site to a residential construction site located just north of Robertson Street and west of Day Street in the unincorporated town of Ramona, approximately 25 miles away. Equipment used for this effort involved a 966 loader, a D6 dozer, and a water equipment truck for dust control. This effort has been completed.

Although the potential remedial measures are not components of the currently proposed project, the City of Santee has requested that the Environmental Impact Report (EIR) include information regarding these remedial measures for informational purposes, which is more particularly described in the *Carlton Oaks Country Club Driving Range Remediation Memorandum* (Appendix B2). The previous water line tunnel boring project at the site included in its analysis the transportation of the dirt off site to another location, but the soil was not removed or hauled off site. (Appendix B2). Therefore, Appendix B2 only includes the trips needed to remove the dirt from the project site and move it to the area in Ramona. Conservatively, the daily air emissions from the remediation work were determined not to exceed the screening level significance thresholds, as described in detail in the *Carlton Oaks Country Club Driving Range Remediation Memorandum* (Appendix B2).

3.5.2.2 State Energy Resources and Use

California has a diverse portfolio of energy resources that produced 2,190.2 trillion British thermal units¹ (BTUs) in 2020 (U.S. Energy Information Administration 2022a).² The state ranked second in the nation for energy production from renewable resources in 2020, producing the equivalent of 1,013.9 trillion BTUs. Excluding offshore areas, the state ranked seventh in the nation in crude oil production in 2020, producing the equivalent of 814.5 trillion BTUs. Other energy sources in the state include natural gas (192.1 trillion BTUs) and nuclear (169.8 trillion BTUs) (U.S. Energy Information Administration 2022a).³

According to the U.S. Energy Information Administration, California consumed approximately 6,922.8 trillion BTUs of energy in 2020. Per-capita energy consumption (i.e., total energy consumption divided by the population) in California is among the lowest in the country, totaling 175.3 million BTU in 2020, which ranked 48th among all states. Petroleum accounted for the majority of energy consumption (2,144 trillion BTUs; 39%), followed by natural gas (2,144 trillion BTUs; 31%); renewable energy, including hydroelectric power, biomass, and other renewables (1,140.5 trillion BTUs; 16%); and interstate electricity (756.5 trillion BTUs; 11%), with the remaining coming from a variety of other sources (U.S. Energy Information Administration 2022b). The transportation sector consumed the most energy (34%), followed by the industrial (25%), residential (22%), and commercial (20%) sectors (U.S. Energy Information Administration 2022b).

Per-capita energy consumption, in general, is declining because of improvements in energy efficiency and design. However, despite this reduction in per-capita energy use, the state's total overall energy consumption (i.e., non-per-capita energy consumption) is expected to increase over the next several decades because of overall growth in population, jobs, and vehicle travel.

¹ One BTU is the amount of energy required to heat 1 pound of water by 1 °F at sea level. BTU is a standard unit of energy used in the United States, but on the English system of units (foot-pound-second system).

² Note that 2020 data are the most recent available data.

³ No coal production occurs in California; however, imported coal made up approximately 3% of California's energy mix as of 2021 (CEC 2023a). SDG&E, the energy provider for the San Diego region, did not have any coal in its energy mix as of 2021 (CEC 2023a).

3.5.2.3 Regional Energy Resources and Use

San Diego County is served by SDG&E, which provides energy services to more than 3.7 million customers (i.e., 1.4 million accounts) in San Diego County and portions of southern Orange County. The utility has a diverse power production portfolio composed of a variety of renewable and non-renewable sources. Energy production typically varies by season and by year. Regional electricity loads tend to be higher in the summer because higher summer temperatures drive increased demand for air conditioning. In contrast, natural gas loads are higher in the winter because the colder temperatures drive increased demand for natural gas heating (CEC 2023a, 2023b, 2023c).

In 2021, the most recent year with California Renewables Portfolio Standard (RPS) data available, more than 44% of the electricity SDG&E supplied was from renewable sources (CEC 2023a). Table 3.5-1 outlines the SDG&E power mix in 2021 compared to the power mix for the state (CEC 2023a). In 2021, SDG&E customers used 21,249 gigawatt hours of electricity and 4,493 million therms of natural gas (CEC 2023b, 2023c). Table 3.5-2 outlines the breakdown of electricity and natural gas usage by sector in the SDG&E service area. Residential and commercial uses account for 79% of electricity use and 46% of natural gas use.

Table 3.5-1. San Diego Gas and Electric and State of California Power Mix in 2021

Energy Resources	SDG&E Power Mix (Percent)	California-Wide Power Mix (Percent)
Eligible Renewables	44.5	33.6
Biomass and Waste	0.9	2.3
Geothermal	0	4.8
Eligible Hydroelectric	0	1.0
Solar	28.5	14.2
Wind	15.2	11.4
Coal	0	3.0
Large Hydroelectric	1.8	9.2
Natural Gas	29.6	37.9
Nuclear	0.2	9.3
Other	0	0.2
Unspecified Sources of Power ¹	23.9	6.8
Total	100	100

Source: CEC 2023a.

Note: SDG&E = San Diego Gas and Electric.

¹ Electricity from transactions that are not traceable to specific generation sources.

Table 3.5-2. Electricity and Natural Gas Consumption in the SDG&E Service Area in 2021

Sector	Electricity (GWh)	Natural Gas (Million Therms)
Agriculture and Water Pump	410	52
Commercial	8,429	899
Industry	1,952	1,431
Mining and Construction	415	224
Residential	8,325	1,187
Streetlight	76	0

Table 3.5-2. Electricity and Natural Gas Consumption in the SDG&E Service Area in 2021

Sector	Electricity (GWh)	Natural Gas (Million Therms)
Total	19,607	3,793

Sources: CEC 2023b, 2023c.

Notes: GWh = gigawatt hours; SDG&E = San Diego Gas and Electric.

3.5.3 Applicable Laws and Regulations

3.5.3.1 Federal

Energy Policy and Conservation Act of 1975 and Corporate Average Fuel Standards

The Energy Policy and Conservation Act of 1975 established the first fuel economy standards for on-road motor vehicles sold in the United States. The National Highway Traffic and Safety Administration is responsible for establishing vehicle standards and revising existing standards. Its Corporate Average Fuel Economy program was created to determine which vehicle manufacturers are in compliance with the fuel economy standards. The U.S. Environmental Protection Agency administers the testing program that generates fuel economy data.

Energy Policy Act of 2005

The Energy Policy Act of 2005, implemented by the U.S. Department of Energy, was intended to establish a comprehensive, long-term energy policy. The act addresses issues regarding energy production in the United States, including the production of oil, gas, coal, and alternative forms of energy, and also establishes programs that deal with energy efficiency and tax incentives. The programs provide credits for the construction of new energy-efficient homes, as well as the production or purchase of energy-efficient appliances. In addition, loan guarantees are provided for entities that develop or use innovative technologies that are greenhouse gas (GHG) free.

Energy Independence and Security Act of 2007

Signed into law in December 2007, the Energy Independence and Security Act was passed to increase the production of clean, renewable fuels; increase the efficiency of products, buildings, and vehicles; improve the energy performance of the federal government; increase U.S. energy security; develop renewable fuel production; and improve vehicle fuel economy. The act included the first increase in fuel economy standards for passenger cars since 1975 and a new energy grant program for use by local governments in implementing energy efficiency initiatives, along with a variety of other green building incentives and programs.

3.5.3.2 State

Assembly Bill 1493, Pavley Rules (2002, amended 2009)/Advanced Clean Cars (2011, amended 2022)/Advanced Clean Truck Regulation (2022)

Known as Pavley I, Assembly Bill 493 provided the nation's first GHG standards for automobiles. Assembly Bill 1493 required the California Air Resources Board to adopt vehicle standards that would lower GHG emissions from new light-duty autos to the maximum extent feasible, beginning in 2009. Additional strengthening of the Pavley standards (referred to previously as Pavley II, now referred to as the Advanced Clean Cars measure) was

adopted in 2012 for vehicle model years 2017–2025. Together, the two standards are expected to increase average fuel economy to roughly 54.5 miles per gallon by 2025. The increase in fuel economy would help lower the demand for fossil fuels.

In August 2022, the California Air Resources Board board members voted to approve the Advanced Clean Cars II proposal, which would dramatically reduce emissions from passenger cars in model years 2026 through 2035. This would require an increasing proportion of new vehicles to be zero-emission vehicles, with the goal being 100% zero-emission vehicles by 2035 (CARB 2022).

The California Air Resources Board also adopted the Advanced Clean Truck Regulation to accelerate a large-scale transition to zero-emission medium- and heavy-duty vehicles. The regulation requires the sale of zero-emission medium- and heavy-duty vehicles to make up an increasing percentage of total annual sales in California between 2024 and 2035. By 2035, zero-emission truck/chassis sales will need to be 55% of Class 2b–3 truck sales, 75% of Class 4–8 straight truck sales, and 40% of truck tractor sales. By 2045, every new medium- and heavy-duty truck sold in California will be a zero-emission vehicle. Large employers, including retailers, manufacturers, and brokers, are required to report information about shipments and shuttle services to ensure that available zero-emission trucks are purchased for their fleets.

Senate Bills 1078/107/X 1-2, Renewables Portfolio Standard and Renewable Energy Resources Act (2002, 2006, 2011)

Senate Bills (SB) 1078 and SB 107 obligated investor-owned utilities, energy service providers, and Community Choice Aggregations to procure an additional 1% of retail sales per year from eligible renewable sources until 20% was reached (in 2010). The California Public Utilities Commission and California Energy Commission (CEC) were jointly responsible for implementing the program. SB X 1-2, called the California Renewable Energy Resources Act, obligated all California electricity providers to obtain at least 33% of their energy from renewable resources by 2020. In 2021, the most recent year with available California RPS data, more than 44% of the electricity SDG&E supplied was from renewable sources (CEC 2023aAs noted above, SB 350 increased the RPS to 50% for 2030.

Senate Bill 350 (2015)

SB 350 (De León, also known as the Clean Energy and Pollution Reduction Act of 2015) was approved by the California Legislature in September 2015 and signed by Governor Brown in October 2015. Its key provisions require the following by 2030: an RPS of 50% and a doubling of energy efficiency in existing buildings.

Senate Bill 100 (2018)

SB 100 (De León, also known as the California Renewables Portfolio Standard Program and the 100 Percent Clean Energy Act of 2018) was approved by the California Legislature and signed by Governor Brown in September 2018. The bill establishes a new RPS target of 50% by 2026, increases the RPS target in 2030 from 50% to 60%, and establishes a goal of 100% zero-carbon energy sources by 2045.

Senate Bill 1020 (2022)

SB 1020 (Laird, also known as the Clean Energy, Jobs, and Affordability Act of 2022) was approved by the California Legislature and signed by Governor Newsom in September 2022. The bill revised state policy by requiring renewable

energy and zero-carbon resources to supply 90% of all retail sales of electricity to California customers by 2035, 95% by 2040, and 100% by 2045.

Building Energy Efficiency Standards, Title 24, Part 6 and Part 11 (2022)

The California Code of Regulations, Title 24, is referred to as the California Building Code. The California Building Code is a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, and accessibility. Of relevance to GHG emissions reductions are the California Building Code's energy efficiency and green building standards, as outlined below.

Part 6 – Energy Code

California Code of Regulations, Title 24, Part 6, is the California Energy Efficiency Standards for Residential and Nonresidential Buildings (California Energy Code). The CEC updates the California Energy Code every 3 years with more stringent design requirements to reduce energy consumption, resulting in lower GHG emissions. The 2022 California Energy Code, which took effect on January 1, 2023, requires builders to use more energy-efficient building technologies to comply with requirements regarding energy use. This includes the requirement that all single-family residential and multifamily buildings have a newly installed photovoltaic (PV) system or newly installed PV modules (CEC 2022).

New construction and major renovations must demonstrate compliance with the current California Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The compliance reports must demonstrate a building's energy performance through use of CEC-approved energy performance software that shows iterative increases in energy efficiency, given the selection of various heating, ventilation, and air conditioning; sealing; glazing; insulation; and other components related to the building envelope (CEC 2022).

Part 11 – California Green Building Standards Code

The California Green Building Standards Code (CALGreen) was first added to Title 24, Part 11, in 2009 as a voluntary code; it became mandatory on January 1, 2011. The most recent code, the 2022 version of CALGreen, effective January 1, 2023, institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. Local jurisdictions must enforce the minimum mandatory CALGreen standards, but may adopt additional amendments for stricter requirements.

The 2022 CALGreen mandatory standards call for the following:

- Outdoor water use requirements, as outlined in a local water efficient landscaping ordinance or the current Model Water-Efficient Landscape Ordinance, whichever is more stringent
- Water-conserving plumbing fixtures and fittings
- 65% construction/demolition waste to be diverted from landfills
- Electric vehicle (EV) charging stations
- Mandatory inspections of energy systems to ensure optimal working efficiency
- Low-pollutant-emitting exterior and interior finish materials (e.g., paints, carpets, vinyl flooring, particleboard)

In addition to the mandatory CALGreen standards, CALGreen provides voluntary tiers for increased environmental performance standards that can be adopted as mandatory measures by local jurisdictions. Similar to the reporting procedure for demonstrating California Energy Code compliance in new buildings and major renovations, compliance with CALGreen-mandatory requirements must be demonstrated through completion of compliance forms and worksheets. The City of Santee does not have any voluntary measures adopted for zone PA or PO, solar or otherwise.

California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to the energy supply, demand, conservation, public health and safety, and maintenance of a healthy economy. The State Energy Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the fewest environmental and energy costs. To further this policy, the State Energy Plan identifies a number of strategies, including providing assistance to public agencies and fleet operators.

California Environmental Quality Act Guidelines, Appendix F

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(b), which was added as part of the 2018 comprehensive update, provides the following guidance for energy impacts:

If analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use. This analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project. (Guidance on information that may be included in such an analysis is presented in Appendix F.) This analysis is subject to the rule of reason and shall focus on energy use that is caused by the project. This analysis may be included in related analyses of air quality, greenhouse gas emissions, transportation or utilities in the discretion of the lead agency.

Appendix F of the State CEQA Guidelines contains energy conservation measures that promote the efficient use of energy for projects. To ensure that energy impacts are considered in project decisions, CEQA requires EIRs to include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy.

The goal outlined in Appendix F of the State CEQA Guidelines is to conserve energy through the wise and efficient use of energy. The means for achieving this goal include the following:

- Decreasing overall per-capita energy consumption
- Decreasing reliance on natural gas and oil
- Increasing reliance on renewable energy sources

3.5.3.3 Local

San Diego Association of Governments

The San Diego Association of Governments (SANDAG) 2021 Regional Plan, which incorporates the 2050 Regional Transportation Plan/Sustainable Communities Strategy, provides a planned vision for the region's transportation system through 2050. The 2021 Regional Plan also incorporates a Sustainable Communities Strategy, as required by SB 375. This includes implementation of a Transportation Demand Management strategy to help local governments reduce energy consumption.

In July 2015, SANDAG launched Plug-in San Diego through a 2-year CEC grant. Plug-in San Diego implemented recommendations from SANDAG's EV Readiness Plan through a combination of strategies, such as resource development, training, technical assistance from an EV expert, and outreach. SANDAG has provided various reports and documents to help property owners acquire EV charging infrastructure and understand the technologies, incentives, and installation options available.

SANDAG Regional Energy Strategy

The Regional Energy Strategy (RES) serves as the energy policy blueprint for the region through 2050 (SANDAG 2014). The RES establishes long-term goals in 11 topic areas, including energy efficiency, renewable energy, distributed generation, transportation fuels, land use and transportation planning, border energy issues, and the green economy. Priority early actions of the RES include the following:

- Pursue a comprehensive building retrofit program to improve efficiency and install renewable energy systems.
- Create financing programs to pay for projects and improvements that save energy.
- Use the SANDAG-SDG&E Local Government Partnership to help local governments identify opportunities and implement energy savings, both at government facilities and throughout the communities.
- Support land use and transportation planning strategies that reduce energy use and GHG emissions.
- Support planning for electric charging and alternative fuel infrastructure.
- Support the use of existing unused reclaimed water to decrease the amount of energy needed to meet the water needs of the San Diego region.

In the RES, SANDAG acknowledges the state's "preferred loading order" for meeting the goals pertaining to California's growing electricity demand (SANDAG 2014). The preferred loading order is as follows:

1. Increase energy efficiency.
2. Increase demand response (e.g., through a temporary reduction or shift in energy use during peak hours).
3. Meet generation needs with renewable and distributed generation resources.
4. Meet new generation needs with clean fossil-fueled generation and infrastructure improvements.

The RES contains a suite of goals and measures for achieving the goals. For example, the RES includes an energy efficiency and conservation goal for reducing per-capita electricity consumption by 20% by 2030 to compensate for population growth. Other regional goals are associated with developing renewable energy, encouraging distributed generation, reducing water consumption, diversifying water sources, reducing peak demand, relying on smart

energy, replacing inefficient power plants, supporting alternative fuels for transportation, and ensuring appropriate land use planning, among others. To accomplish the goals, SANDAG recommends various measures that local jurisdictions can implement, including pursuing a comprehensive building retrofit program and identifying, securing, or developing funding mechanisms to pay for energy-related projects and programs. The RES is updated periodically to reflect progress toward the RES goals, account for changes in energy and climate change policy, and make recommendations for continued progress.

City of San Diego

Climate Action Plan

On August 2, 2022, the San Diego City Council adopted its 2022 *Climate Action Plan* (CAP), which sets an ambitious, community-wide goal of net-zero GHG emissions by 2035 (City of San Diego 2022). The 2022 CAP establishes baseline GHG emissions for 2019, sets goals for GHG reductions for the milestone years 2030 and 2035, and details the implementation actions and phasing for achieving the goals. To meet this goal, the City of San Diego would be required to reduce GHG emissions to approximately 4.2 million metric tons of carbon dioxide equivalent (MMTCO_{2e}) by 2030 and achieve net-zero emissions by 2035.

To achieve net-zero GHG emissions by 2035, the 2022 CAP calls for the City of San Diego to do the following:

- Phase out 90% of fossil fuel use in buildings by 2035 through electrification, appliance swaps and other emerging technologies, and improving efficiency and indoor air quality.
- Work with San Diego Community Power to offer 100% renewable electricity for all customers in San Diego by 2030.
- Plan for and invest in a mobility network that shifts 50% of all trips to walking, biking, or transit, and reduces the overall need for vehicle use by 2035.
- Support and accelerate the transition from combustion to electric vehicles to account for at least 25% of light-duty vehicle miles traveled (VMT) by 2035.
- Reduce waste production and divert 90% of waste away from landfills by 2035.
- Restore 700 acres of wetlands and related habitats to promote carbon storage and ecosystem health.
- Achieve 35% urban tree canopy coverage by 2035 by planting and maintaining tens of thousands of trees, focusing first on underserved communities that are vulnerable to extreme heat.

The energy usage related to the widening and restriping of West Hills Parkway, and other off-site improvements within the City of San Diego, have been incorporated into the overall construction of the project. Operational energy usage may be tied to golf carts and water demand and, as a result, the project's land uses in the City of San Diego would include very minimal energy usage (a portion of the redesigned golf course). The project's consistency with the energy goals from the 2022 CAP is discussed in Threshold 2 under Section 3.5.5.

General Plan

The City of San Diego's *General Plan – Conservation Element* includes policies that address energy conservation throughout the City of San Diego. These policies address sustainable development; sustainable building design; waste diversion; renewable energy use; and energy efficiency, generation, and conservation, among other topics (City of San Diego 2024). The following policies are applicable to the proposed project:

Policy CE-A.5: Employ sustainable or “green” building techniques for the construction and operation of buildings.

Policy CE-A.8: Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or by renovating or adding on to existing buildings, rather than constructing new buildings.

Policy CE-I.4: Maintain and promote water conservation and waste diversion programs to conserve energy.

Policy CE-I.5: Support the installation of photovoltaic panels, and other forms of renewable energy production.

Policy CE-I.9: Implement local and regional transportation policies that improve mobility and increase energy efficiency and conservation.

Policy CE-I.10: Use renewable energy sources to generate energy to the extent feasible.

City of Santee

Sustainable Santee Plan

The proposed project’s clubhouse, hotel, residential development, and part of the golf course would be within the City of Santee. The City of Santee adopted its *Sustainable Santee Plan* (SSP) on January 8, 2020, with the goal of reducing GHG emissions and improving energy efficiency within the City of Santee. Specifically, the SSP (City of Santee 2019) provides 10 GHG reduction and energy efficiency goals. These 10 GHG emissions reduction goals and strategies focus on reducing resource consumption, improving alternative modes of transportation, and reducing overall energy consumption in the City of Santee:

Goal 1: Increase Energy Efficiency in Existing Residential Units

Goal 2: Increase Energy Efficiency in New Residential Units

Goal 3: Increase Energy Efficiency in Existing Commercial Units

Goal 4: Increase Energy Efficiency in New Commercial Units

Goal 5: Decrease Energy Demand through Reducing Urban Heat Island Effect

Goal 6: Decrease Greenhouse Gas Emissions through Reducing VMT (Reduced Fuel Use)

Goal 7: Increase Use of Electric Vehicles (Fuel Switching to Cleaner Sources of Energy)

Goal 8: Improve Traffic Flow (Improves Fuel Efficacy of Roadway Traffic)

Goal 9: Decrease Greenhouse Gas Emissions through Reducing Solid Waste Generation

Goal 10: Decrease Greenhouse Gas Emissions through Increasing Clean Energy Use

The project’s consistency with the energy goals from the SSP are discussed in Threshold 2 under Section 3.5.5.

General Plan

The City of Santee's *General Plan Mobility Element* includes various goals, objectives, and policies related to energy conservation (City of Santee 2017). The following policies are applicable to the proposed project:

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 9.3: 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.

The project's consistency with the energy goals from the SSP are discussed in Threshold 2 under Section 3.5.5.

3.5.4 Project Impact Analysis

3.5.4.1 Methodology

Energy impacts would occur if the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Energy impacts would also occur if the proposed project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This energy analysis evaluates the sources of energy consumption associated with existing conditions and the proposed project.

Existing Energy Use

The existing site consists of a 145-acre 18-hole golf course, clubhouse, pool, restaurant, and golf amenities, such as a pro-shop and driving range, as well as multiple sheds and a maintenance building. In addition, the existing development has a 43-unit hotel and 9 single-story casitas that look like residential units. Combined, the hotel and casitas operate as a 52-unit hotel. The existing hardscape is approximately 106,000 square feet making up the on-site parking and roadways. The existing golf course has roots dating back to the 1950s and was last renovated in 1989. Table 3.5-3 highlights the project site's existing electricity, natural gas, and fossil fuel demand.

Table 3.5-3. Existing Uses - Energy Demand

Source ¹	Gallons	kWh per Year ²	kBTU per Year ²
Fuel (Diesel and Gasoline)	75,153	N/A	N/A
Electricity	N/A	1,227,265	N/A
Natural Gas	N/A	N/A	4,697,491

Source: Refer to Appendix C2 for the modeling inputs and results.

Notes: kWh = kilowatt hour; N/A = not applicable

- ¹ The electricity and natural gas demand were modeled using CalEEMod with the following land use types: Golf Course, Hotel, Racquet Club (best match for a club house within CalEEMod), and a quality restaurant.
- ² 1 kWh represents the energy used by a 1,000-watt device running for 1 hour; 1 kBTU equals 1,000 British Thermal Units, the energy required to heat 1 pound of water by 1°F.

Project Energy Use During Construction

Implementation of the proposed project would result in energy use from construction of the residential developments, golf course improvements, off-site improvements, trail segments, hotel, and clubhouse and resort. Energy use associated with construction activities would include use of equipment, employee vehicles and delivery/haul trucks, and temporary construction office trailers. In addition, energy would be required for operation of the heavy-duty, off-road construction equipment (e.g., cranes, forklifts, loaders) that would be used for a variety of activities, including demolition of structures, walkways, and asphalt; construction of buildings and infrastructure; and foundation work. It was assumed that all off-road equipment would be diesel powered. Energy would also be required for operation of on-road vehicles (e.g., pickup trucks, flatbed trucks, passenger cars), which would be used for material and equipment hauling, crew and material movement, employee commuting, and material disposal. As discussed in Section 3.2, Air Quality and Health Risks, construction was modeled to begin in 2025 and be completed by early 2029.⁴ A full summary of construction phasing and construction equipment is provided in Appendix B1.

Energy use during construction was estimated using a combination of methods and energy factors from published best available documentation. Energy usage associated with the fuel consumption of on-road vehicles was calculated by converting VMT to gallons of gasoline and diesel consumed based on fleet data and fuel consumption factors from the Emission FACTors (EMFAC) model. Energy usage associated with the fuel consumption of off-road construction equipment was calculated by converting anticipated construction equipment activity data to gallons of diesel consumed using applicable fuel consumption factors from the California Air Resources Board. Temporary electric power for potential as-necessary lighting and electronic equipment, such as computers inside temporary construction trailers, would be provided by SDG&E or other providers within San Diego County. The electricity used would result in a negligible contribution to the proposed project's overall energy consumption. A full list of assumptions and energy calculations for project construction can be found in Appendix C2.

Project Energy Use During Operation

Operation of the proposed project would also require electrical energy for the residential neighborhoods, golf course, clubhouse and resort, and retail uses. Natural gas would only be used at the restaurant.

Operational energy use was estimated using methods and energy factors similar to those described for short-term construction energy use. Fuel consumption during operation was calculated by converting operational VMT data to gallons of diesel and gasoline consumed using fleet data and fuel consumption factors from EMFAC. Estimates of energy use associated with area sources, such as natural gas consumption, water consumption, electricity, wastewater, and solid waste removal, were based on the methods, assumptions, and data sources within California Emissions Estimator Model (CalEEMod) for the proposed land uses. A full list of assumptions as well as energy calculations for project operations can be found in Appendix C2.

⁴ It is possible that project construction may occur later than this date. However, assuming an earlier construction year is conservative because construction equipment fleets are becoming more fuel efficient and cleaner in future years. Therefore, the current analysis assumes a worst-case scenario for fuel consumption.

Project Design Features

The project proponent would implement the following project design features (PDFs) to help reduce energy consumption (the full text of these PDFs can be found in Chapter 2, Project Description):

PDF-1:	California Energy Code
PDF-2:	CALGreen Code
PDF-3:	Electric-Only Uses
PDF-4:	Energy Star Appliances
PDF-5:	Low-Flow Water Appliances
PDF-6:	Recyclables and Yard Waste
PDF-7:	Residential Electric Vehicle Charging
PDF-8:	Non-Residential Electric Vehicle Charging
PDF-9:	Tree Planting
PDF-10:	On-Site Solar Energy Generation

3.5.4.2 Thresholds of Significance

The significance criteria that follow are based on Appendix F and Appendix G of the State CEQA Guidelines. The criteria provide the basis for determining the significance of impacts associated with the demand for energy resulting from implementation of the proposed project.

According to State CEQA Guidelines Appendix G, energy impacts would be considered significant if the project were to:

1. Result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.5.5 Project Impacts and Mitigation Measures

Threshold 1: *Would implementation of the proposed project result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?*

Impact Discussion

Construction

Project construction would require electricity for powering lights and electronics in mobile offices, gasoline and diesel fuel for transporting employees to and from the project site and operating haul trucks, and diesel fuel for operating off-road equipment. Table 3.5-4 outlines construction energy use by source. As shown, the majority of energy used during construction would be attributed to the use of diesel-powered construction equipment, followed by the use of diesel-powered trucks for material hauling. As stated previously, electricity consumed during construction would be a temporary use and would make a negligible contribution to the proposed project’s overall energy consumption. However, total gasoline and diesel consumed is combined as fuel and evaluated further herein.

Table 3.5-4. Project Construction - Annual Petroleum Consumption

Source	Fuel (gallons)
Off-Road Equipment	198,725
Worker, Vendor, and Haul Trucks	53,040
Total Fuel Consumption	251,765

Source: Appendix C2.

During the proposed project’s construction period, fuel would be used to power on-site construction equipment, off-site haul trucks, and workers’ automobiles. As shown in Table 3.5-4, construction of the proposed project would consume an estimated 251,765 gallons of fuel annually (see Appendix C2). In San Diego County, approximately 1,397,607,000 gallons of fuel were consumed in 2021 (CEC 2024a). The proposed project’s fuel consumption would represent 0.018014% of San Diego County use.

Construction activities and corresponding fuel consumption would be temporary and localized because the use of diesel fuel and heavy-duty equipment would not be a typical condition once the project is completed. In addition, there are no unusual project characteristics that would require the use of construction equipment that would be less energy efficient compared with equipment on similar construction sites in other parts of the state. Therefore, construction-related fuel consumption as a result of implementation of the proposed project would be minimal and would not be anticipated to result in the inefficient, wasteful, or unnecessary energy use compared with similar types of construction projects in the region.

Operation

Operation of the proposed project would require the use of energy resources for vehicle trips made by employees and visitors, and utility-related needs (e.g., electricity, natural gas, water, wastewater, solid waste). Fuel consumption associated with motor vehicles traveling to and from the project site during operation is a function of VMT and the vehicle fleet mix. Default settings were applied within CalEEMod for existing energy sources, except for mobile trip

estimates, which were provided by the project traffic engineer (Appendix O1). The proposed project is estimated to result in 25,710 VMT daily or 9,384,150 miles annually. The estimated fuel use from vehicles traveling to and from the project site during operation, as well as the existing uses, is shown in Table 3.5-5. Energy requirements for gasoline and diesel would lessen over time with stricter vehicle fuel economy standards.

Table 3.5-5. Project Operations - Annual Petroleum Consumption

Fuel	Gallons
Project Uses	
Fuel Consumption	191,513
Existing Uses	
Fuel Consumption	75,153
Net Change (Project – Existing)	
Gasoline Consumption	116,360

Sources: Appendices C1 and C2.

As shown in Table 3.5-5, the net project increase in fuel demand would be 116,360 gallons each year. In San Diego County, approximately 1,378,604,374 gallons of fuel (diesel and gasoline) are consumed annually, based on consumption rates in 2022 (CEC 2024a). The proposed project's fuel consumption would represent approximately 0.000084% of San Diego County's fuel use. Therefore, impacts related to operational petroleum use would be less than significant, and no mitigation is required. Given this, the project would have a less-than-significant impact on fuel consumption.

Project operation would require electricity for buildings, outdoor lighting, golf cart charging, water conveyance and demand, landscaping equipment, and other uses.⁵ The estimation of operational electricity demand for the project, as calculated by CalEEMod version 2022.1, could be as high as 6.1 gigawatt hours per year, as shown in Table 3.5-6. For comparison, total residential and non-residential electricity consumption for San Diego County in 2022 was 20,243 gigawatt hours (CEC 2024b). As shown in Table 3.5-6, the proposed project's net increase in electricity demand would be 2,394,644 kilowatt hours per year. For natural gas demand, the proposed project would result in a decrease of 4,284,400 thousand BTUs per year when comparing the existing conditions at the project site. The proposed project's operational electricity increase of 2,394,644 kilowatt hours per year would result in a minimal increase in electricity consumption compared to the total demand in San Diego County (i.e., 0.0118% increase). A comparison of operational electrical use to San Diego County's total electrical use can be found in Appendix B1. Therefore, impacts related to operational electricity use would be less than significant, and no mitigation is required.

As discussed in Section 3.7, Greenhouse Gas Emissions, the project would implement PDF-3, Electric-Only Uses, and only the proposed restaurant uses would include natural gas infrastructure and have natural gas demand. Operational natural gas demand for the project, as calculated by CalEEMod version 2022.1.1.24 29, would be reduced by 4,284,400 thousand BTUs⁶ per year with the removal of the existing uses; refer to Table 3.5-6. For comparison, total residential and non-residential natural gas consumption for San Diego County in 2022 was approximately 24,145,115 million BTUs (CEC 2024c). The proposed project's net operational natural gas reduction of 44,284,400 thousand BTUs per year would help reduce natural gas consumption in San Diego County, which is

⁵ The energy consumption modeling shown herein includes the incorporation of the project design features (see Section 3.5.4).

⁶ One BTU is the amount of energy required to heat 1 pound of water by 1 °F at sea level. BTU is a standard unit of energy used in the United States but on the English system of units (foot-pound-second system).

related to PDF-3, Electric-Only Uses. Therefore, impacts related to operational natural gas use would be less than significant, and no mitigation is required.

Table 3.5-6. Project Operations - Annual Energy Consumption

Energy	kWh per Year	kBTU per Year
Project Uses		
Electricity Demand	5,618,387	N/A
Natural Gas Demand	N/A	413,091
Existing Uses		
Electricity Demand	1,227,265	N/A
Natural Gas Demand	N/A	4,697,491
Net Change (Project - Existing)		
Electricity Demand	4,391,122	N/A
Natural Gas Demand	N/A	-4,284,400

Sources: Appendices C1 and C2.

Notes: kWh = kilowatt hour; N/A = not applicable

¹ kWh represents the energy used by a 1,000-watt device running for 1 hour; 1 kBTU equals 1,000 British Thermal Units, the energy required to heat 1 pound of water by 1°F.

Implementation of the proposed project would support the means for achieving energy conservation outlined in State CEQA Guidelines Appendix F (Table 3.5-7). In accordance with Appendix F of the State CEQA Guidelines, the proposed project would decrease reliance on fossil fuels such as coal, natural gas, and oil, and increase reliance on renewable energy sources. In accordance with the SSP, the proposed project would be required to adhere to the 2022 CALGreen Tier 2 voluntary measures, which include a number of sustainability features (e.g., low-flow fixtures, energy-efficient lighting, on-site renewable energy, energy-efficient design features) that would reduce the proposed project's energy demand. Furthermore, the proposed project would not be expected to increase overall per-capita energy consumption. Thus, the proposed project would support the goal that calls for energy conservation, as outlined in State CEQA Guidelines Appendix F, and would not result in a the wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, impacts would be less than significant.

Table 3.5-7. Proposed Project Comparison to State CEQA Guidelines Appendix F

Project Impact Considerations from Appendix F	Project Applicability and Analysis
Energy requirements and energy use efficiencies by amount and fuel type for each stage of the project	Applies. See Table 3.5-4 and Table 3.5-6 and related discussions, which break down construction and operational energy use. As indicated, the project would minimally increase the use of electricity and the need for fossil fuels, such as diesel fuel, gasoline, and natural gas.
Effects on local and regional energy supplies and the need for additional capacity	Applies. Construction and operation of the proposed project would not require upgrades to existing energy infrastructure to accommodate the increased energy demand of the proposed project. In addition, new buildings constructed under the proposed project would be designed in compliance with the building energy efficiency standards of CALGreen, which would reduce energy demand during project operation. As such, there would be no adverse effects on local or regional energy supplies as a result of the proposed project.

Table 3.5-7. Proposed Project Comparison to State CEQA Guidelines Appendix F

Project Impact Considerations from Appendix F	Project Applicability and Analysis
Effects of the project on peak- and base-period demands for electricity and other forms of energy	Applies. The energy load would vary over time, but the current energy supply and infrastructure would be able to accommodate the additional demand without interruption or issues for existing customers and without the need for new infrastructure. As discussed above, the project would not result in the inefficient or wasteful use of energy, and would not propose demand that would affect peak- and base-period demand.
Degree to which the project complies with existing energy standards	Applies. The proposed project would be fully compliant with all existing energy standards, including the Clean Energy and Pollution Reduction Act of 2015, Energy Building Regulations and Energy Conservation Standards, and CALGreen measures, which require energy-efficient lighting and building materials within the project site to exceed existing energy standards.
Effects of the project on energy resources	Applies. The proposed project would not result in an adverse impact on energy resources. There are adequate energy resources to accommodate the additional project energy demand, and, as discussed above, consistency with the CALGreen measure and installation of solar and removal of natural gas from a large component of the site would reduce impacts of the project on energy resources.
Projected transportation energy use requirements and overall use of efficient transportation alternatives	Applies. The proposed project would minimally increase the need for fossil fuels compared to baseline conditions. Construction of the residential developments, golf course improvements, clubhouse, and resort would result in new motor vehicle trips, which would result in the use of fuel (diesel and gasoline). However, the project would incorporate project design features for installation of electric vehicle (EV) chargers to support EV usage. Moreover, mitigation measure MM-TRA-1 requires implementation of Transportation Demand Management measures, such as ride-sharing, vanpooling, bike-sharing, and transit subsidies, to reduce vehicle trips during construction and operation. Overall, project design features and mitigation measures would reduce the energy demand of the proposed project.

Note: CALGreen = California Green Building Standards Code.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would implementation of the proposed project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Impact Discussion

State and local renewable energy and energy efficiency plans that are applicable to the proposed project are discussed in Section 3.5.3, Applicable Laws and Regulations. State plans, California Title 24 energy efficiency standards, SB 350, SB 100, and SB 1020 contain standards related to energy efficiency and renewable energy. The proposed project would be required to comply with the state and local plans and regulations, all of which are aimed at increasing energy efficiency and renewable energy development. Some plans and regulations are statewide and do not require local or project action to implement. Table 3.5-8 provides a consistency analysis regarding state and local energy plans and regulations.

Table 3.5-8. Project Consistency with State and Local Energy Plans and Regulations

Regulation, Plan, or Policy	Project Applicability and Consistency
Clean Energy and Pollution Reduction Act of 2015 (SB 350)	Consistent. The Clean Energy and Pollution Reduction Act of 2015 requires the following by 2030: (1) RPS of 50% and (2) a doubling of efficiency for existing buildings. The RPS is dependent on the utility provider. The project would not impede reaching a goal of 50%. In addition, the project would install solar photovoltaic systems to produce on-site renewable energy.
Title 24 Energy Efficiency Standards (Title 24, Part 6, Energy Code; Title 24, Part 11, California Green Building Standards Code)	Consistent. The proposed project would result in the construction of energy-efficient buildings that would comply with existing building codes. At a minimum, new construction occurring under the proposed project would be required to comply with the current Title 24 building standards, which include a broad set of requirements for energy conservation. In addition, the proposed project would comply with the CALGreen Tier 2 voluntary measures, and would implement sustainable design measures that would exceed the baseline CALGreen standards.
The 100 Percent Clean Energy Act of 2018 (SB 100)	Consistent. SB 100 increases the RPS target set in SB 350 to 60% by 2030. It also requires all retail sales of electricity to California end-users and electricity procured to serve state agencies to be provided by zero-carbon resources by 2045. Building energy efficiency is expected to increase as a result of compliance with Title 24 building codes, which are expected to move toward net-zero energy for newly constructed buildings. In addition, the project would be required to comply with the CALGreen Tier 2 voluntary measures, which would require installation of on-site solar photovoltaic systems. Thus, the project would not conflict with implementation of SB 100.
Clean Energy, Jobs, and Affordability Act of 2022 (SB 1020)	Consistent. SB 1020 revises state policy to require renewable energy resources and zero-carbon resources to supply 90% of all retail sales of electricity to California customers by 2035, 95% customers by 2040, and 100% by 2045. Because the proposed project would be required to comply with the CALGreen Tier 2 voluntary measures, which require installation of on-site solar photovoltaic systems, and with the Title 24, Part 6, energy efficiency measures, the proposed project would not conflict with implementation of SB 1020.
SB 375 and SANDAG's <i>San Diego Forward: The Regional Plan</i>	Consistent. SANDAG's 2021 Regional Plan established a long-range blueprint for the San Diego region's growth and development through 2050. <i>San Diego Forward</i> envisions a regional pattern of growth and development that reflects smart growth principles, which include transit-oriented development, preservation of natural resources and agricultural lands, and development of communities that are resilient to the consequences of climate change and other environmental changes. Strategic

Table 3.5-8. Project Consistency with State and Local Energy Plans and Regulations

Regulation, Plan, or Policy	Project Applicability and Consistency
	<p>decisions about how land is used are also called for to support surrounding communities where future housing and jobs are located (SANDAG 2021, Chapter 2).</p> <p>At the regional level, SANDAG's <i>San Diego Forward</i> was adopted for the purpose of reducing GHG emissions attributable to passenger vehicles in the San Diego region. Although <i>San Diego Forward</i> does not regulate land use or supersede the exercise of land use authority by SANDAG's member jurisdictions (i.e., the County of San Diego and cities therein), the regional plan is a relevant regional reference document for purposes of evaluating the intersection of land use and transportation patterns, and the corresponding GHG emissions. The purpose of <i>San Diego Forward</i> is to provide direction and guidance on future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout San Diego County as stipulated under SB 375. Although the proposed project would include residential land uses on the project site, it would be consistent with the growth anticipated within the City of San Diego and also includes a number of PDFs to reduce GHG emissions that support the goals of <i>San Diego Forward</i>. For example, the project includes a photovoltaic solar system, electric vehicle charging stations, low-flow water fixtures, and drought-tolerant landscaping.</p> <p>The City of San Diego's adopted <i>General Plan</i> also emphasizes sustainable community design principles within its goals and policies. By locating the proposed project near existing and planned infrastructure, services, and jobs in a compact pattern of development, as well as promoting sustainability among its residents, the proposed project meets a number of the objectives of <i>San Diego Forward</i>, Assembly Bill 32, and SB 375. Moreover, the project has been designed around the guiding principles of the <i>General Plan</i> and is developing the site with land uses that were anticipated in the <i>General Plan</i>.</p>
SANDAG Regional Energy Strategy	<p>Consistent. SANDAG's RES established long-term goals related to energy efficiency, renewable energy, distributed generation, and transportation fuel, among other items. The strategies and goals found in the RES were used as guidance for development of the energy components of the 2050 Regional Transportation Plan/Sustainable Communities Strategy. Because the proposed project would be required to comply with Title 24, Part 11, CALGreen Tier 2 voluntary measures and the Title 24, Part 6, energy efficiency measures, the project would support SANDAG RES goals related to energy efficiency and renewable energy. In addition, because the proposed project would be required to reduce project vehicle miles traveled, pursuant to the goals of the SSP, the project would support land use and transportation planning strategies to reduce energy use and GHG emissions, consistent with the RES.</p>
City of Santee General Plan – Mobility Element: Policy 9	<p>Consistent. As outlined in the project's <i>Transportation Impact Study</i> (Appendix O1) (see Transportation Demand Management [TDM] Measures 1A, 1D, 1E, 4E, and 4G), the proposed project would subsidize transit passes for its employees, provide a bicycle-share program for resort guests, implement and incentivize a vanpool program for employees, and implement a community-based travel plan for its residents. The proposed project would also participate in SANDAG's iCommute program to assist project residents and employees with ridesharing for their commute. In keeping with the <i>Safe Routes to School Plan</i> (SANDAG 2012), the nearest school to the proposed project, Santee Elementary, would be accessible from the proposed project by walking, biking, or public transit. The proposed project would also include an interconnected system of golf cart paths, a multiuse path, sidewalks to connect resort facilities and residential areas, and ingress/egress connections that would accommodate trail</p>

Table 3.5-8. Project Consistency with State and Local Energy Plans and Regulations

Regulation, Plan, or Policy	Project Applicability and Consistency
	linkages planned by SANDAG (i.e., the San Diego River Trail) and the City of Santee. These TDM measures, iCommute program, and safe routes would help reduce petroleum fuel use within the City of Santee. As such, the project would be consistent with the energy goals of the City of Santee's <i>General Plan Mobility Element</i> : Policy 9.
City of Santee <i>Sustainable Santee Plan</i>	Consistent. The City of Santee adopted the SSP in 2020 to reduce community and municipal GHG emissions. The goals of the SSP are to reduce the City of Santee's community-wide GHG emissions to 15% below 2005 emissions by 2020, 40% below 2005 emissions by 2030, and 49% below 2005 emissions by 2035. As discussed further in Section 3.7, Greenhouse Gas Emissions, the SSP Checklist was completed for the proposed project (Appendix D). As shown in Appendix D, the proposed project would be consistent with the SSP Checklist. The proposed project's GHG emissions would also not exceed the applicable service population threshold. Furthermore, the proposed project would be consistent with the incorporated PDFs to improve energy efficiency (PDF-1, California Energy Code; PDF-2, CALGreen Code; PDF-3, Electric-Only Uses; PDF-4, Energy Star Appliances; and PDF-10, On-Site Solar Energy Generation), increase the use of electric vehicles (PDF-7, Residential Electric Vehicle Charging, and PDF-8, Non-Residential Electric Vehicle Charging), reduce the urban heat island effect (PDF-9, Tree Planting), and reduce GHG emissions (PDF-5, Low-Flow Water Appliances, and PDF-6, Recyclables and Yard Waste). As such, the project would be consistent with all applicable energy reduction measures from the SSP.
City of San Diego <i>2022 Climate Action Plan</i>	Consistent. The 2022 CAP establishes baseline GHG emissions for 2019, sets goals that call for GHG reductions of 4.2 MMTCO _{2e} by 2030 and net-zero emissions by 2035, and details implementation actions and phasing for achieving the goals. As discussed in further detail under Threshold 2 in Section 3.7, Greenhouse Gas Emissions, the proposed project would be consistent with the 2022 CAP and its GHG reduction targets.

Notes: CALGreen = California Green Building Standards Code; CAP = Climate Action Plan; GHG = greenhouse gas; MMTCO_{2e} = million metric tons of carbon dioxide equivalent; PDF = project design feature; RES = Regional Energy Strategy; RPS = Renewables Portfolio Standard; SANDAG = San Diego Association of Governments; SB = Senate Bill; SSP = *Sustainable Santee Plan*.

As shown in Table 3.5-8, the proposed project would be consistent with statewide renewable energy or energy efficiency plans and regulations. Impacts would be less than significant.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.5.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would implementation of the proposed project result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The geographic scope of the cumulative analysis for natural gas, electricity, and petroleum is San Diego County. Several cumulative projects presented in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, include nearby projects that would have the potential to increase energy demand in the region. Regional energy demand would most likely increase as growth occurs. However, as discussed in Section 3.5.5, Project Impacts and Mitigation Measures, implementation of the proposed project would not result in an inefficient use of natural gas, electricity, or fuel. In addition, the proposed project would be required to be consistent with CALGreen (Title 24, Part 11) Tier 2 voluntary measures and the energy efficiency measures of the California Energy Code (Title 24, Part 6), which would minimize energy use through development of EV charging and renewable energy infrastructure to increase efficiency. Cumulative projects would be required to demonstrate that their energy use would not be wasteful, inefficient, or unnecessary, and would comply with applicable energy efficiency regulations, such as Title 24. Therefore, the proposed project and cumulative projects would not combine to result in a significant cumulative impact pertaining to the wasteful, inefficient, or unnecessary use of energy.

Cumulative Threshold 2: Would implementation of the proposed project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

The applicable state plans that address renewable energy and energy efficiency are CALGreen (Title 24, Part 11), the California Energy Code (Title 24, Part 6), and RPS (including SB 1020). The applicable local plan is the SSP. As discussed under Section 3.5.5, Project Impacts and Mitigation Measures, the proposed project would be required to meet the mandatory energy requirements of the 2022 CALGreen Tier 2 voluntary measures and the 2022 California Energy Code. Furthermore, the project would not conflict with SDG&E's implementation of the RPS and the zero-carbon energy supply goals of the state, pursuant to SB 1020. In addition, as detailed in Section 3.7, Greenhouse Gas Emissions, the proposed project would be consistent with the SSP. Cumulative projects would be required to demonstrate that there would be no conflict or obstruction of a state or local plan for renewable energy or energy efficiency. Therefore, the proposed project, in combination with the cumulative projects, would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

3.5.7 Summary of Significant Impacts

Implementation of the proposed project would not result in any potentially significant impacts. Impacts related to Threshold 1 and Threshold 2 (cumulative and non-cumulative) would be less than significant prior to mitigation, and no mitigation would be required.

3.5.8 References

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3.6 Geology and Soils

3.6.1 Overview

This section describes the existing conditions and applicable laws and regulations for geology and soils, followed by an analysis of the proposed Carlton Oaks Country Club and Resort Project (project).

Information in this section is based on the *Geotechnical Investigations* prepared by Geocon Incorporated (Geocon) in 2018 and 2019, and updated in 2022, for the proposed project's two residential neighborhoods and country club and resort site (Appendices G1 and G2, respectively). Where appropriate, the information in these reports was used to describe the geologic conditions of the project site.

Under the California Environmental Quality Act (CEQA), an Environmental Impact Report (EIR) is not required to include an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those existing conditions. Therefore, when discussing impacts from the environment on the project, such as how a fault rupture or soil condition may affect a project, the analysis will first determine if there is a potential for the project to exacerbate the issue. If evidence indicates it would not, then the analysis will conclude by stating such. If the proposed project would potentially exacerbate the issue, then analysis is provided to determine if the exacerbation would or would not be significant. However, it should be noted that as it relates to faults and soil conditions, the project must be built in accordance with the California Building Code (CBC), the City of San Diego's Municipal Code, and the City of Santee's Municipal Code, which include requirements to conduct geotechnical evaluations that identify geotechnical hazards and recommend measures that would minimize these hazards.

3.6.2 Environmental Setting

3.6.2.1 Geology and Subsurface Conditions

Regional Geology

The proposed project is in the Peninsular Ranges Geomorphic Province, which extends approximately 900 miles from the Transverse Ranges and the Los Angeles Basin south to the southern tip of Baja California. The province is characterized by rugged mountains in Mesozoic igneous and metamorphic rocks to the east, with a dissected coastal plain on Cenozoic sediments to the west. The Peninsular Ranges vary in width from approximately 30 miles to 100 miles, and are traversed fault zones trending roughly northwest-southeast. Based on a review of published geologic maps and observations during site reconnaissance and subsurface investigation, the site is underlain by two surficial soil units and two formational units. The surficial units consist of previously placed artificial fill and Holocene-age young alluvial deposits. The two formational units consist of Pleistocene/Holocene-age older alluvial deposits (specific to West Residential area and North Residential area) and Eocene-age Friars Formation (Appendix G1 and G2).

Local Geologic Setting

Information obtained during a review of Appendices G1 and G2 indicates that the project site and nearby area are underlain by surficial soil units and two formational units. The surficial units consist of previously placed artificial fill and Holocene-age young alluvial deposits. The formational units consist of Pleistocene/Holocene-age older alluvial deposits and of Eocene-age Friars Formation.

Artificial Fill

The project site is underlain by previously placed artificial fill material consisting of golf course embankments. The fill extends to a depth of approximately 7 feet below ground surface within the eastern portion of the project site and to a depth of 14 feet in the northern and western portions of the project site (Appendices G1 and G2). The fill material consists of loose to medium-dense silty sand in the eastern portion of the site, and the fill material in the northern and western portions of the project site consist of loose to medium-dense silty/clayey sands and soft to firm sandy clays. The fill is not considered to be engineered structural fill and would require remedial grading in the form of complete removal and re-compaction where structural improvements are proposed.

Young Alluvium

Young alluvial soils (Holocene-age) exist below the fill materials in the West Residential area and a portion of the North Residential area. The depth of this material is unknown in the West Residential and North Residential area, and it ranges between approximately 12 feet to 27 feet below ground surface at the resort site (Appendices G1 and G2). Young alluvial soils consist of loose to medium-dense silty, fine to coarse sands. The alluvial soils are slightly compressible when subjected to additional fill or structural loading and are potentially liquefiable.

Older Alluvium

Older alluvial soils (Pleistocene/Holocene-age) exist below the artificial fill and are exposed at the surface in the Residential North. The thickness of this unit ranges from approximately 5 feet to greater than 16 feet thick, and these deposits consist primarily of dense to very dense clayey/silty sands, gravels, and cobbles. Older alluvium is not present within Residential West or the Resort Facility.

Friars Formation

The Middle Eocene-age Friars Formation exists beneath the alluvium and varies from 5 feet to 19 feet below the existing ground surface on the residential sites but 15 feet to 30 feet below the surface at the resort site. This formation, where encountered, consists of very stiff to hard, pale green, sandy siltstone, and dense, silty fine sandstone. It is not anticipated this unit would be encountered during grading of the site.

Groundwater

Groundwater associated with the San Diego River and its tributaries was encountered at depths of approximately to 10 feet below the existing ground surface in the area where the Resort Facility is proposed and at depths of approximately 5 feet to 19 feet below the existing ground surface where Residential North and Residential West are proposed. In addition, water is present at the surface in several ponds/lakes on the golf course. The groundwater is an important factor in determining the depth of remedial grading of surficial deposits. It is not uncommon for groundwater or seepage conditions to develop where none previously existed. Groundwater elevations are dependent on seasonal precipitation, irrigation, and land use, among other factors, and vary as a result. Wet alluvial removals would be encountered during grading operations, which could result in difficult excavation and compaction conditions. Typically construction cannot occur if groundwater is present within 10 feet of the foundation unless remedial grading is performed under the supervision of an engineer.

3.6.2.2 Faults and Seismicity

An earthquake occurs when two blocks of the earth suddenly slip past one another. The surface where they slip is called the *fault* or *fault plane*. A *fault* is defined as a fracture, or a zone of closely associated fractures, along which rocks on one side have been displaced with respect to those on the other side. Most faults are the result of repeated displacement that may have taken place suddenly and/or by slow creep. As required by the Alquist–Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act), California and local governments have produced geologic studies and maps that identify the location and characteristics of faults and fault zones within the state. Some of these include the California Geological Survey (CGS) Earthquake Fault Zone Maps and Fault Evaluation Reports, the City of San Diego Seismic Safety Study, Geologic Hazards and Faults (2008), and the City of Santee Geotechnical/Seismic Hazard Map (2002).

Regional

The project site is not located on any known “active,” “potentially active,” or “inactive” fault traces, as defined by CGS (Appendices G1 and G2; City of San Diego 2008). Six known active faults are within 50 miles of the project site. The nearest known active faults are the Newport Inglewood and Rose Canyon Fault Zones, approximately 11 miles west of the project site; these are the dominant sources of potential ground motion. Earthquakes that might occur on the Newport Inglewood or Rose Canyon Fault Zones or other faults within the Southern California and northern Baja California area are potential generators of significant ground motion at the site.

On-Site Faulting and Ground-Surface Rupture

As discussed in the preceding paragraph, there are no known “active,” “potentially active,” or “inactive” fault traces, as defined by CGS in the regional area. As such, the project site is concluded to be not underlain by active or potentially active fault strands or fault zones (Appendices G1 and G2; City of San Diego 2008).

Liquefaction, Lateral Spreading, Seismically Induced Settlement, and Landslides

Seismically induced soil liquefaction can be described as a significant loss of strength and stiffness due to cyclic pore-water pressure generation from seismic shaking or other large cyclic loading. Liquefaction typically occurs when (1) a site is located in a zone with seismic activity; (2) on-site soils are cohesionless; (3) groundwater is encountered within 50 feet of the surface; and (4) soils’ relative densities are less than about 70%. If these four criteria are met, then a seismic event could result in a rapid pore-water pressure increase from the earthquake-generated ground accelerations. The material is a free-flowing material that does not allow for increased pore-water pressure. Adverse impacts associated with liquefaction include lateral spreading, ground rupture and/or sand boils, and settlement of the liquefiable layers. Lateral spreading occurs when there is liquefiable soil in the immediate vicinity of a free face, such as a slope. Factors controlling lateral displacement include earthquake magnitude, distance from the earthquake epicenter, thickness of liquefiable soil layer, grain size characteristics, fine contents of the soil, and the density of granular deposits, such as sands and gravel. Seismically induced settlement is settlement that may occur whether or not the potential for liquefaction exists.

The project site is not located within a state-designated liquefaction hazard zone; however, the *County of San Diego Hazard Mitigation Plan* maps the site within a zone with liquefiable layers (County of San Diego 2017). The City of Santee’s *Geotechnical/Seismic Hazard Study* for the Safety Element of the *Santee General Plan* (Figure 8-3 in City of Santee 2002) maps the project site as having a “moderate to high” liquefaction hazard potential.

During preparation of the geotechnical investigation (Appendix G1), exploratory borings excavated within the younger alluvium in the Residential North area revealed that this deposit is up to approximately 20 feet thick, and

is underlain by the Friars Formation. The water table is approximately 6 feet to 15 feet below the surface. The grading plan indicates that approximately 15 feet of fill is planned along the southern portion of Residential North, where the younger alluvium will be left in place. Based on these factors, and considering the conditions required for liquefaction to occur, the potential for liquefaction and seismically induced settlement occurring within Residential North soils is also considered to be “low.”

Residential West is underlain by artificial fill and younger alluvium to the maximum depth explored of 20 feet below the ground surface, and approximately 20 feet of fill is planned along the southern portion of Residential West, where the younger alluvium would be left in place. The water table is approximately 5 feet to 19 feet below the ground surface. Based on these factors, and considering the conditions required for liquefaction to occur, the potential for liquefaction and seismically induced settlement occurring within Residential West is considered to be “low.”

In the resort area, the water table was found to be approximately 3 feet to 6 feet below the ground surface. The borings indicate that the alluvium consists of loose to very dense, silty, fine-to-coarse sand. Laboratory testing indicates that this deposit has a relatively low compression potential. The grading plan indicates approximately 10 feet to 15 feet of fill is planned in the Resort, where the younger alluvium will be left in place below the groundwater. Based on these factors, and considering the conditions required for liquefaction to occur, it is anticipated that the potential for liquefaction and seismically induced settlement or lateral spreading occurring within the Resort area is considered to be “moderate” to “high.”

Landslides

A landslide results from the downgradient movement of earthen material along a slope or hillside. Landslides occur on slopes when soil and base material lose strength, typically from an increase in pore-water pressures and the forces of gravity, and cause the soil and base material to move down-gradient. Landslides can result from a variety or combination of root causes, such as steepness of slope, type of material, water content of slope soils, amount and type of vegetation, and major natural hazards, such as earthquakes, volcanic eruptions, wildfires, and floods. Steeper slopes and weaker rocks are the most vulnerable to mass wasting events. Landslides can occur as slow but progressive movements of soil over time or from the rapid deterioration of soil on a slope.

The project site is relatively flat to gently sloping and significant slopes do not exist adjacent to the project site. No evidence of landslide deposits was encountered at the project site during the geotechnical investigation (Appendices G1 and G2).

3.6.2.3 Paleontological Setting

The project site consists of previously placed artificial fill Pleistocene/Holocene-age older alluvial deposits and Eocene-age Friars Formation (Appendices G1 and G2). Figure 3.6-1 through

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Figure 3.6-3 show the geologic formations for Residential West, Residential North, and the Resort, respectively. By providing the underlying geologic formations, these figures illustrate the paleontological sensitivity levels within the project site. The sediments at the bottom of stream beds of the later Quaternary alluvium are generally younger than 10,000 years old. Because of their young age, they are assigned low paleontological resource sensitivity. The Friars Formation consists mainly of sandstones, siltstone, mudstones, and cobble conglomerate. It is rich in vertebrate fossils, especially terrestrial mammals such as primates, rodents, artiodactyls, and perissodactyls. Well-preserved remains of marine microfossils and macroinvertebrates, and remains of fossil leaves have been recovered from the Friars Formation. The formation crops out from Mission Valley north to Rancho Bernardo in the east and Rancho Santa Fe in the west. In the south, the formation extends from Tecolote Canyon east to Santee and Lakeside. The Friars Formation is assigned high paleontological resource sensitivity by the City of San Diego (City of San Diego 2022).

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Source: Geocon Incorporated, 7/20/2018.

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Figure 3.6-1
Geologic Formations - Residential West

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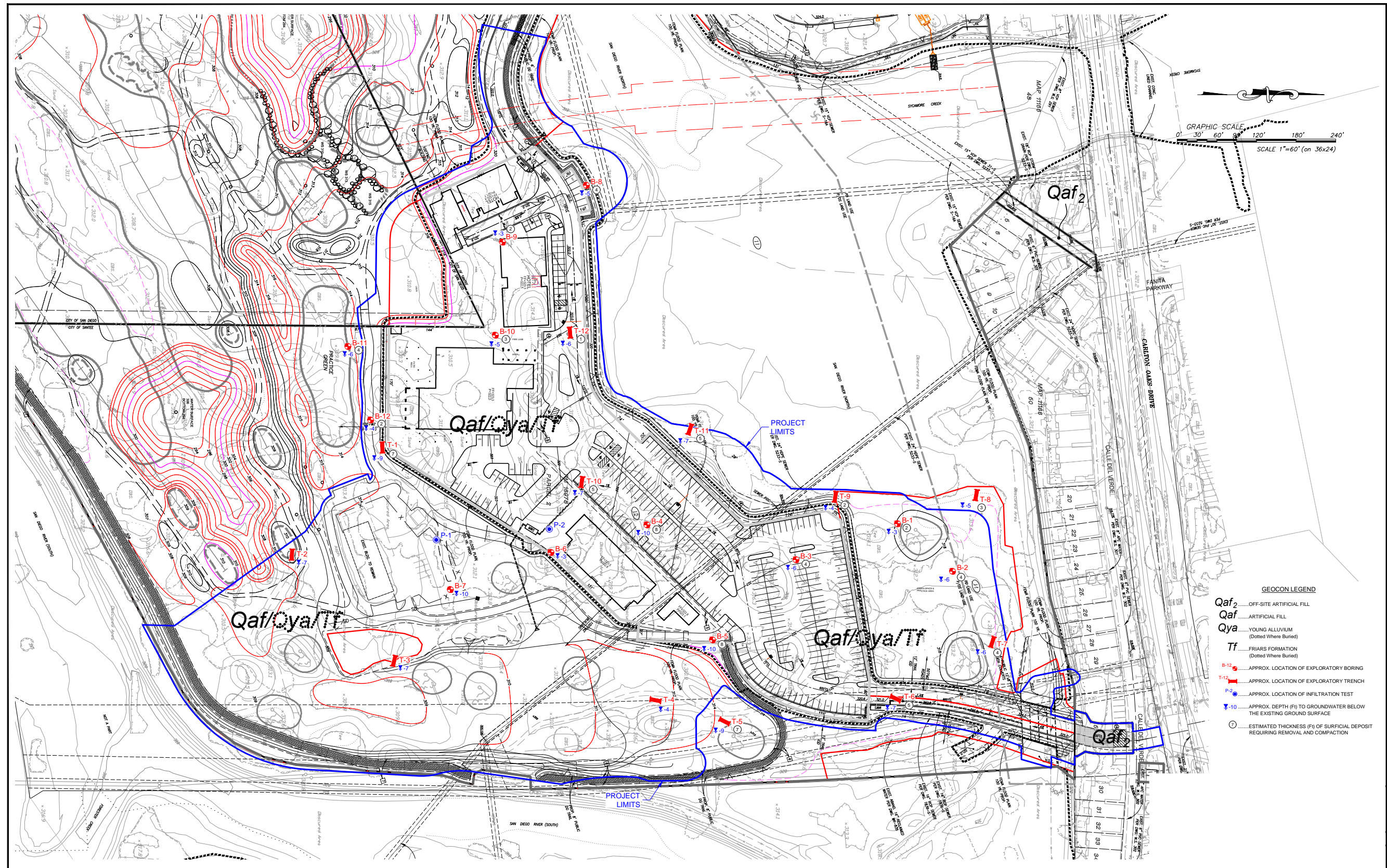


Source: Geocon Incorporated, 7/20/2018.

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Figure 3.6-2
Geologic Formations - Residential North

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Source: Geocon Incorporated, 1/30/2025.

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Figure 3.6-3
Geologic Formations - Resort Area

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3.6.3 Applicable Laws and Regulations

3.6.3.1 Federal

International Building Codes

Development and building design standards, implemented through the California Building Code (CBC), require the proposed project to comply with appropriate seismic design criteria in the International Building Code, adequate drainage facility design, and preconstruction soils and grading studies. Seismic design standards have been established to reduce many of the structural problems occurring because of major earthquakes. In 1998, the code was revised as follows:

- Upgrade the level of ground motion used in the seismic design of buildings.
- Add site amplification factors based on local soils conditions.
- Improve the way ground motion is applied in detailed design.

Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act establishes the framework for safe and healthful working conditions for working people by authorizing enforcement of the standards developed under the act. The act assigns the Occupational Safety and Health Administration (OSHA) two regulatory functions to ensure that employers are providing safe and healthful workplaces: (1) setting standards; and (2) conducting inspections. OSHA standards may require that employers adopt certain practices, means, methods, or processes reasonably necessary and appropriate to protect workers on the job. Employers must become familiar with the standards applicable to their establishments and eliminate hazards. OSHA's Excavation and Trenching standard, Code of Federal Regulations (CFR) Title 29, Part 1926.650, covers requirements for excavation and trenching operations. OSHA requires that all excavations in which employees could potentially be exposed to cave-ins be protected by sloping or benching the sides of the excavation, supporting the sides of the excavation, or placing a shield between the side of the excavation and the work area.

3.6.3.2 State

Alquist–Priolo Earthquake Fault Zoning Act

The primary purpose of the Alquist–Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The act addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards. The law requires the State Geologist to establish regulatory zones (known as *Earthquake Fault Zones* or *Alquist-Priolo Zones*) around the surface traces of active faults and issue locational maps to all affected cities, counties, and state agencies for their use in safe construction. Before a project may be permitted, a geologic investigation is required to demonstrate that proposed buildings would not be constructed across active faults. A licensed geologist must prepare an evaluation and written report of a specific site. If an active fault is found, then a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet) (CGS and USGS 2013).

California Building Code

Development and building design standards require the proposed project to comply with appropriate seismic design criteria in the International Building Code, adequate drainage facility design, and preconstruction soils and grading studies. Seismic design standards have been established to reduce many of the structural problems occurring because of major earthquakes. In 1998, the International Building Code was revised as follows:

- Upgrade the level of ground motion used in the seismic design of buildings.
- Add site amplification factors based on local soils conditions.
- Improve the way ground motion is applied in detailed design.

California Code of Regulations Title 24 (California Building Code), which is based on the International Building Code, applies to all applications for building permits. The CBC (also called the California Building Standards Code) has incorporated the International Building Code, which was first enacted by the International Conference of Building Officials in 1927 and has been updated approximately every 3 years since that time.

The current version of the CBC (2022) became effective on January 1, 2023. Building codes provide minimum standards regulating a number of aspects of construction that are relevant to geology and geologic hazards. These include excavation, grading, and fill placement; foundations; mitigation of soil conditions such as expansive soils; and seismic design standards for various types of structures.

Local agencies must ensure that development in their jurisdictions complies with guidelines contained in the CBC. Cities and counties can, however, adopt building standards beyond those provided in the code.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (PRC 2690–2699.6) is intended to reduce damage resulting from earthquakes. While the Alquist-Priolo Act addresses surface fault rupture, the Seismic Hazards Mapping Act addresses other earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. Its provisions are similar in concept to those of the Alquist-Priolo Act: the state is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards, and cities and counties are required to regulate development within mapped seismic hazard zones.

Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Under PRC 2697, cities and counties require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. Each city or county submits one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval.

State Water Resources Control Board Construction Storm Water Program

Construction activities that disturb 1 acre or more of land must obtain coverage under the State Water Resources Control Board (SWRCB) Construction General Permit (Order 2009-0009-DWQ, as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ). Under the terms of the permit, applicants must file complete and accurate Notice of Intent and Permit Registration Documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction best management practices (BMPs) and prepare a construction Storm Water Pollution Prevention Plan (SWPPP) containing a site map that shows the construction site perimeter, existing and proposed

buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site.

The proposed project would be required to comply with the Construction General Permit because it would disturb more than 1 acre during construction.

3.6.3.3 Local

City of Santee

General Plan

Divided into nine elements, the City of Santee's *General Plan* (City of Santee 1984) is a statement of intent by the City of Santee about the future development of the community. This is accomplished through objectives and policies that serve as long-term policy guides for physical, economic, and environmental growth. In its *Safety Element*, the City of Santee's *General Plan* consists of a series of objectives, standards, and plan policies related to geology and geologic hazards, as well as specific procedures and regulations for types of geotechnical studies, including seismic hazard studies, that are required for proposed projects in the City of Santee (City of Santee 2003). The *Safety Element* contains the following objective and policies that relate to the proposed project:

Objective 2.0: Minimize the loss of life and destruction of property in Santee caused by seismic and geologic hazards.

Policy 2.1: The City should utilize existing and evolving geologic, geophysical and engineering knowledge to distinguish and delineate those areas that are particularly susceptible to damage from seismic and other geologic conditions.

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.

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.

Municipal Code

Chapter 11.40, Excavation and Grading

Section 11.40.140, Erosion Control Plans: When required by Chapter 9.06 or when the City Engineer determines that an erosion control system is required on a site, an applicant for a grading permit must develop plans for an erosion-control system in accordance with the City's design and development standards and submit them for the review and approval by the City Engineer. The approved erosion control-plans become part of the grading plans and a condition of issuance of the grading permit (Ordinance 564 § 3, 2019).

Section 11.40.130: Preliminary Soil Engineering and Geology Reports

1. Three copies of a preliminary soils engineering report will be submitted with the application for a grading permit. Each report will be prepared by a soil engineer and contain all information applicable to the project in accordance with generally accepted geotechnical engineering practice. The preliminary soil engineering report will include, but not be limited to, the following:
 - a. Information and data regarding the nature, distribution, and the physical and chemical properties of existing soils
 - b. Location of faults as defined by a registered geologist or certified engineering geologist
 - c. Conclusions as to the adequacy of the site for the proposed grading
 - d. Recommendations for general and corrective grading procedures
 - e. Foundation design criteria
 - f. Slope gradient, height and benching, or terracing recommendations
 - g. The potential for groundwater and seepage conditions and procedures for mitigation of the groundwater-related problems
 - h. Other recommendations, as necessary, commensurate with the project grading and development
2. The soil engineer and engineering geologist should refer to the *Geotechnical/Seismic Study for the Santee General Plan* in preparing the reports required by this section.
3. Slope stability analyses will accompany soil engineering reports for all slopes in the Friars Formation, regardless of the slope ratio. The soil engineer will provide a written statement indicating acceptable slope stability.
4. Recommendations contained in the approved reports will be incorporated into the grading plans and specifications and will become conditions of the grading permit.
5. Preliminary geological investigations and reports will be required for all land development projects designated as Group I or Group II, except those Group II projects located in Zone "A," as shown on Figure 20, Seismic Hazards and Study Areas Map (for which a geological reconnaissance would be required), as outlined in Table 21 of the City's General Plan. This requirement may be extended to adjacent properties where known or reasonably inferred instability may adversely affect the property. The preliminary geological investigation report will include, but not be limited to, the following:
 - a. A comprehensive description of the site topography and geology including, where necessary, a geology map
 - b. A statement as to the adequacy of the proposed development from an engineering geologic standpoint
 - c. A statement as to the extent that known or reasonably inferred stability on adjacent properties may adversely affect the project
 - d. A description of the field investigation and findings
 - e. Conclusions regarding the effects geologic conditions would have on the proposed development
 - f. Specific recommendations for plan modification, corrective grading and/or special techniques and systems to facilitate a safe and stable development
 - g. Other recommendations, as necessary, commensurate with the project grading and development
6. The preliminary geological investigation report may be combined with the preliminary soils engineering report.

7. A seismicity study and report is required for all land development projects designated as Group I and for those designated as Group II and located in Zone “C,” shown on Figure 20, Seismic Hazards and Study Areas Map, of the City's General Plan. The report will be prepared by an engineering geologist or a soil engineer with expertise in earthquake technology and its application to buildings and other civil engineering works. The seismic report may be combined with the soil and geologic investigation reports (Ordinance 234 § 1, 1989).

City of San Diego

General Plan

The goals of the *Seismic Safety* section of the *Public Facilities, Services, and Safety Element* of the City of San Diego's *General Plan* are the protection of public health and safety through abated structural hazards and mitigated risks posed by seismic hazards and developments that avoid inappropriate land uses in identified seismic-risk areas. The policies in the *Seismic Safety* section are intended to protect public health and safety through the application of effective seismic, geologic, and structural considerations (City of San Diego 2006). The *Public Facilities, Services and Safety Element* of the General Plan identifies the following policy that is applicable to the proposed project:

Policy PF-Q.1: Protect public health and safety through the application of effective seismic, geologic, and structural considerations.

- a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the CEQA document accompanying a discretionary action.
- b. Maintain updated citywide maps showing faults, geologic hazards, and land use capabilities, and related studies used to determine suitable land uses.
- c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected.
- d. Utilize the findings of a beach and bluff erosion survey to determine the appropriate rate and amount of coastline modification permissible in the City.
- e. Coordinate with other jurisdictions to establish and maintain a geologic “data bank” for the San Diego area.
- f. Regularly review local lifeline utility systems to ascertain their vulnerability to disruption caused by seismic or geologic hazards and implement measures to reduce any vulnerability.
- g. Adhere to state laws pertaining to seismic and geologic hazards.

Municipal Code

Chapter 14, Article 2, Division 1: Grading Regulations

Earthwork activities, including grading, are regulated by the City of San Diego's Municipal Code, Chapter 14, Article 2, Division 1. This Division provides standards for slope stability, protection of property, erosion control, water

quality, landform preservation, and protection of the public health, safety, and welfare of persons, property, and the environment. The following sections are related to geology and soils and apply to the proposed project:

Section 142.0130, Development Standards for Grading: All grading will be designed and performed in conformance with applicable City Council policies and the standards established in the Land Development Manual.

Section 142.0131, Geotechnical Report Requirements: All grading will be designed to incorporate the recommendations of any required geotechnical reports. All geotechnical reports will be prepared in accordance with the standards established in the *Lands Development Manual* and the City of San Diego's *Technical Guidelines for Geotechnical Reports*.

Section 142.0135, Grading Within the Special Flood Hazard Area: Grading within the Special Flood Hazard Area will comply with Chapter 14, Article 2, Division 2, *Drainage Regulations*, and Chapter 14, Article 3, Division 1, *Environmentally Sensitive Lands Regulations*.

Section 142.0146, Erosion, Sedimentation, and Water Pollution Control: All grading work will incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4, *Landscape Regulations*, and the standards established in the Land Development Manual. All development will be conducted to prevent erosion and stop sediment and pollutants from leaving the work site. The property owner is responsible to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures to the satisfaction of the City Manager, whether or not such measures are a part of approved plans. The property owner will install, monitor, maintain, and revise these measures, as appropriate, to ensure their effectiveness. Controls will include measures outlined in Chapter 14, Article 2, Division 2, *Storm Water Runoff Control and Drainage Regulations*, that address the development's potential erosion and sedimentation impacts.

Section 142.0148, Protection of Adjacent Properties and Public Rights-of-Way: During grading, the property owner will take all necessary measures to protect adjacent property and public ROWs from damage that may result from the work. The property owner will provide fences or barricades needed to eliminate any hazard to the public in their normal use of the property or public ROW as follows:

- Where a temporary excavation is adjacent to an existing developed public ROW or other public property and the slope gradient is 50 percent (i.e., 2 horizontal feet to 1 vertical foot) or steeper, or the height of the excavation is more than 6 feet, temporary fences or barricades will be provided adjacent to the excavation satisfactory to the City Engineer. The fences or barricades will be constructed and maintained as long as the hazard resulting from the excavation exists.
- Where a permanent excavation is adjacent to an existing developed public ROW or other public property and the slope gradient is 50 percent (2 horizontal feet to 1 vertical foot) or steeper, the height of the excavation is more than 6 feet, and the top of the slope is within 10 feet of the public ROW, the property owner will construct a permanent, 4-foot-high fence adjacent to the public ROW, satisfactory to the City Engineer. The City Engineer may modify the requirements of this section where it is evident that the grading work would present no hazard to the adjacent property or public ROWs.

Chapter 12, Article 9, Division 2: Building Permit Procedures

Section 129.0201, Purpose of Building Permit Procedures: The purpose of these procedures is to establish the process for review of Building Permit applications for compliance with the minimum standards necessary to safeguard life or limb, public health, property, and welfare. The intent of these procedures is to review the proposed design, construction methods, and type and quality of materials used for new construction or for construction involving existing structures.

Section 129.0202(a), When a Building Permit Is Required: No structure regulated by the Land Development Code will be erected, constructed, enlarged, altered, repaired, improved, converted, permanently relocated, or partially demolished unless a building permit has first been obtained from the Building Official, except as exempted in Sections 129.0202(b) and 129.0203.

Section 129.0206, Who May Prepare Plans for Building Permits: If plans or other material submitted are not prepared by an architect or engineer licensed by the State of California, then the Building Official may require the applicant to demonstrate that state law does not require the material to be prepared by a licensed architect or engineer. The Building Official may require plans, computations, and specifications to be prepared by an architect or engineer licensed by the State of California, in circumstances where preparation by a licensed professional is not required by state law.

Section 129.0210, Plan Review Procedures: The application, plans, specifications, and other data filed by an applicant for a Building Permit will be reviewed by the Building Official. The plans may be reviewed by other departments of the City to verify compliance with any other applicable provisions of the Municipal Code.

3.6.4 Project Impact Analysis

3.6.4.1 Methodology

This section of this EIR considers the development of the proposed project and acknowledges the physical changes that would occur to the existing setting from implementation of the proposed project. The methods for the proposed project's geotechnical investigations consisted of geological reconnaissance, including the observation of geologic conditions and the evaluation of possible geologic hazards, and a subsurface exploration, including drilling, logging, and sampling of exploratory soil borings to evaluate subsurface conditions. The methods for analyzing paleontological resources included determining whether the project's proposed grading would affect underlying geologic formations of high or medium paleontological sensitivity. Additionally, as discussed in Section 3.6.4.2, Thresholds of Significance, the portion of the project lying within the City of San Diego's jurisdiction was analyzed using the City of San Diego's supplemental thresholds for paleontological resources (City of San Diego 2022).

3.6.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the CEQA Guidelines and provide the basis for determining significance of impacts from geotechnical hazards and soil conditions associated with the implementation of the proposed project.

Impacts are considered significant if the project would result in any of the following:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)
 - b. Strong seismic ground shaking
 - c. Seismic-related ground failure, including liquefaction
 - d. Landslides
2. Result in substantial soil erosion or the loss of topsoil.
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site lateral spreading, subsidence, or collapse.
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
5. Have soils that would be incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Supplemental Threshold for Paleontological Resources Located within the City of San Diego

To determine the level of significance related to the proposed project's impacts on paleontological resources within the City of San Diego, the City of San Diego's CEQA Significance Determination Thresholds methodology is utilized for determining significance. An answer in the affirmative to either of the following questions would indicate that a significant paleontological impact would occur, and mitigation would be required. It should be noted that the following thresholds for paleontological sensitivity would apply only to the construction areas within the City of San Diego (e.g., a portion of the golf course and certain off-site improvements):

1. Would the project require more than 1,000 cubic yards of excavation and more than 10 feet deep in an area considered to have high paleontological sensitivity?
2. Would the project require more than 2,000 cubic yards of excavation and more than 10 feet deep in an area considered to have moderate paleontological sensitivity?

No monitoring is required in areas with no or low paleontological sensitivity.

3.6.5 Project Impacts and Mitigation Measures

Threshold 1: Would the proposed project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?

Impact Discussion

As described in Section 3.6.2.2, Faults and Seismicity, the project site is not underlain by known active or potentially active faults or fault zones; however, Newport Inglewood and Rose Canyon Fault Zones are located approximately

12 miles west of the project. Furthermore, the proposed project site is not within an active Alquist-Priolo Earthquake Fault Zone. Because there are no faults within the project site, and ground-disturbing activities associated with the proposed project, including building foundations, would not influence seismic phenomena, construction and operation of the proposed project would not exacerbate the existing conditions that could cause an earthquake fault to rupture.

The project site is within an area that is susceptible to seismic ground shaking and seismic-related ground failure, including liquefaction. As such, the proposed project could be subject to future seismic shaking and strong ground motion resulting from seismic activity. However, the proposed project would not exacerbate the potential for strong seismic ground shaking to occur or the intensity of the ground shaking. Southern California is a seismically active region and all structures in the region will likely experience strong ground shaking at some point. Ground disturbance activities associated with the proposed project would not influence seismic phenomena.

The proposed project is within a zone with liquefiable layers that is classified as having a moderate-to-high liquefaction potential for the Resort area (Appendix G2); however, the areas proposed for Residential West and Residential North were found to have a “low” potential for liquefaction (Appendix G1). Liquefaction typically occurs when certain geologic criteria are met, such as a seismically active area, cohesionless soils, shallow groundwater, and soils with relative densities less than 70%.

As discussed in Liquefaction, Lateral Spreading, Seismically Induced Settlement, and Landslides under Section 3.6.2.2, Faults and Seismicity, the project site is relatively flat to gently sloping, and significant slopes do not exist adjacent to the site. Furthermore, the proposed project site is not in an area of landslide susceptibility. Therefore, potential impacts related to landslides would not occur.

The proposed project would be required to follow OSHA regulations related to worker safety, pursuant to the Occupational Safety and Health Act of 1970 contained in CFR Title 29. Furthermore, as with any new development within the state, building design and construction for the proposed project would be required to comply with the current seismic design and soil hazard provisions of the CBC. The 2022 CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. The CBC also requires that geotechnical reports be prepared to identify geological hazards, including liquefaction, and provide recommendations for foundation type and design criteria. Additionally, construction of the proposed project would be required to adhere to the seismic safety requirements and geological hazard requirements contained in the San Diego Municipal Code and City of Santee Municipal Code, which incorporates the CBC, with additional city-specific requirements.

Thus, construction and operation of the proposed project would not have the potential to exacerbate rupture of an active fault or conditions that would promote strong seismic ground shaking or landslides. However, the proposed project would include excavation of soil and construction of structures within this area of high liquefaction. These activities could loosen soil compaction and otherwise disturb the existing geologic conditions, thus exacerbating the potential for liquefaction to occur, if compliance with regulations does not occur (**Impact GEO-1**).

Impact Determination

Implementation of the proposed project would not exacerbate the potential of a rupture of a known earthquake fault, strong seismic ground shaking, or landslides. However, the proposed project would exacerbate the potential for liquefaction. Potentially significant impact(s) include the following.

City of Santee

Impact GEO-1: Potential to Exacerbate Conditions That Would Result in Liquefaction.

Within the Resort area, there is the potential that grading activities could loosen soil compaction and change the existing geologic conditions in a way that would increase the potential for liquefaction to occur.

City of San Diego

Within the golf course (San Diego portion) and off-site improvement areas, the potential for liquefaction to occur is low.

Mitigation Measures

The following mitigation measures would be implemented for **Impact GEO-1**:

MM-GEO-1. Geotechnical Recommendations. Prior to the issuance of a grading permit, the applicant will demonstrate that the recommendations and specifications contained in the geotechnical investigations conducted for the project site and off-site areas have been incorporated into the final project design and construction documents as minimum project requirements to the satisfaction of the City of Santee Director of Engineering. The recommendations are discussed in detail in the reports prepared by Geocon and updated in 2024 (Appendices G1 and G2). The geotechnical recommendations include, but are not limited to, general geotechnical recommendations, soil and excavation characteristics, soluble sulfate exposure, grading, seismic design criteria, slope stability, corrosive potential, foundation and concrete slab on-grade, post-tensioned foundation system parameters, pavement recommendations, retaining walls and lateral loads, slope maintenance, grading and foundation review, site drainage and moisture protection, grading plan review, and recommended grading specifications. Recommendations also include remedial grading for the areas containing artificial fill or young alluvium saturated by groundwater, as well as recommendations for the bridge pier foundations for the bridge proposed from Residential North to the Resort site. Lastly, the human-made lakes present at both Residential North and Residential West would need to be dewatered and evaluated by an engineer with respect to remedial grading.

Level of Significance After Mitigation

With implementation of **MM-GEO-1**, potential impacts (**Impact GEO-1**) would be less than significant because compliance with regulations would be demonstrated in the geotechnical investigation that would include recommendations for design and construction practices.

Threshold 2: Would the proposed project result in substantial soil erosion or the loss of topsoil?

Impact Discussion

Soil-disturbing activities, such as grading and excavation, could result in soil erosion. Ground-disturbing activities associated with construction of the proposed project would expose soils to the erosional forces of wind and water during storm events, potentially resulting in erosion and sedimentation on and off the project site.

As further detailed in Section 3.9, Hydrology and Water Quality, the proposed project would comply with the Construction General Permit that requires implementation of a SWPPP to address erosion and sedimentation at the project site during construction activities. Temporary BMPs, such as silt fences, straw wattles, sediment traps, gravel sandbag barriers, or other effective BMPs, would be implemented to control runoff and erosion during construction activities. Implementation of erosion and sediment-control BMPs would prevent substantial soil erosion and sedimentation from exposed soils. Post-construction measures, such as surface drainage design provisions that would recapture and filter runoff prior to irrigation reuse, along with proper maintenance practices, would reduce potential soil erosion during operation of the proposed project. Furthermore, the proposed project would be subject to San Diego Municipal Code Section 142.0146 (Erosion, Sedimentation, and Water Pollution Control), described in detail in Section 3.6.5, Project Impacts and Mitigation Measures, which states that all development shall implement and maintain both temporary and permanent erosion, sedimentation, and water pollution control measures, as well as the stormwater basins and drainage systems that are proposed as part of the project design. The project would also be subject to the City of Santee Municipal Code Section 11.40.140, (Erosion Control Plans), which states that an applicant for a grading permit must submit plans for an erosion-control system in accordance with the City of Santee's design and development standards and submitted for the review and approval of the City Engineer. Therefore, potential impacts related to soil erosion or loss of topsoil would be less than significant.

Impact Determination

Implementation of the proposed project would not result in substantial soil erosion nor the loss of topsoil. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: Would the proposed project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site lateral spreading, subsidence, or collapse?

Impact Discussion

Alluvial and fill layers underlying the project site are considered unstable due to their liquefaction potential. Because liquefaction potential exists in the project site, there could also be a potential for lateral spreading (liquefaction is discussed in detail under Threshold 1). Lateral spreading is a secondary seismic effect of liquefaction and occurs when there is liquefiable soil in the immediate vicinity of a free face, such as a slope. Factors controlling lateral displacement include earthquake magnitude, distance from the earthquake epicenter, thickness of liquefiable soil layer, grain size characteristics, fine contents of the soil, and density of granular deposits, such as sands and gravel. As discussed under Threshold 1, implementation of the proposed project has the potential to exacerbate the potential for liquefaction if compliance with regulations were to not occur. Consequently, the proposed project could also exacerbate conditions that would promote lateral spreading.

Ground subsidence results from fluid (i.e., water) extraction from underlying formations, which causes the collapse of pore spaces previously occupied by the removed fluid. The collapse of these pore spaces compacts these

underlying formations, leading to a gradual drop in ground-surface elevation. Ground subsidence is most often found in areas where large volumetric withdrawals of fluids from underground reservoirs has occurred or is ongoing. Ground shaking from tectonic activity can exacerbate the vertical sinking of land in an area over the withdrawal site. Underlying geologic formations within San Diego County have a low potential of subsidence, and there are no historical records of subsidence events in San Diego County (County of San Diego 2017; USGS 2023). Although the proposed project would require dewatering during construction as a consequence of the proposed soil engineering, dewatering would be temporary and would not result in the substantial drawdown of groundwater (see Section 3.9, Hydrology and Water Quality). As such, temporary dewatering would not permanently affect groundwater levels, and the proposed project would not exacerbate conditions related to subsidence.

Collapsible soils are subject to changes in volume and settlement from the introduction of water, which can break down soil-grain bonds in dry, low-density, unconsolidated soils, resulting in collapse of the soil. Other mechanisms for soil collapse include the sudden closure of voids in a soil, whereby the sudden decrease in volume results in loss of the soil's internal structure, causing the soil to collapse. The fill material and young alluvial soils that underlie the project site are compressible and not considered suitable to support structures (Appendices G1 and G2). However, the proposed project would not exacerbate those existing conditions because it would not introduce large amounts of water to the soil. Moreover, the proposed project would be required to be constructed in compliance with mandatory CBC regulations related to unstable soils, which include requirements for specific materials to be used for fill, compaction specifications, dewatering requirements, removal of unsuitable material prior to placing fill, and other soil enhancements for surficial stability. However, the proposed project has the potential to exacerbate conditions that would enhance collapsible soils if compliance with regulations does not occur.

Therefore, construction and operation of the proposed project would not have the potential to exacerbate conditions that would potentially result in on- or off-site subsidence. However, construction of the Resort would include excavation of soil and construction of structures in an area with unstable soils, a condition related to liquefaction (discussed in Threshold 1). These activities could loosen soil compaction and otherwise disturb the existing geologic conditions, thus exacerbating the potential for lateral spreading or soil collapse to occur, which would be a significant impact if the proposed project did not comply with regulations, such as the CBC, the City of San Diego's Municipal Code, the City of Santee's Municipal Code and recommendations in the site specific geotechnical reports (**Impact GEO-2**).

Impact Determination

The proposed project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site lateral spreading, subsidence, or collapse. Potentially significant impact(s) include those discussed below.

City of Santee

Impact GEO-2: Potential to Exacerbate Conditions That Would Result in Lateral Spreading or Soil Collapse.

The potential exists that construction activities could loosen soil compaction and change the existing geologic conditions in a way that would increase the potential for lateral spreading or soil collapse to occur.

City of San Diego

Within the project site lying inside the City of San Diego's jurisdiction, the potential for liquefaction is considered low; therefore the potential for lateral spreading or soil collapse is correspondingly low.

Mitigation Measures

To mitigate for **Impact GEO-2**, implementation of **MM-GEO-1** within the resort area would be required.

Level of Significance After Mitigation

With implementation of **MM-GEO-1** and compliance with regulations, potential impacts would be less than significant because compliance with regulations, such as CBC, the City of San Diego's Municipal Code, and the City of Santee's Municipal Code, would be demonstrated in the geotechnical investigation that would include recommendations for design and construction practices. Impacts would be less than significant with mitigation incorporated.

Threshold 4: Would the proposed project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact Discussion

Expansive soils are fine-grained soils (generally high-plasticity clays) that can undergo a significant increase in volume with an increase in water content, as well as a significant decrease in volume with a decrease in water content. Changes in the water content of highly expansive soils can result in severe distress for structures constructed on or against the soils. Table 18-1-B of the Uniform Building Code illustrates a classification for expansive soils utilizing an expansion index and the associated potential for expansion. For example, an expansion index of 0–20 has a very low potential for expansion, whereas an expansion index of 91–130 has a high potential for expansion.

As discussed, soils in the project site consist of fill material up to approximately 14 feet below ground surface. This fill material consists of silty sand in the eastern portion of the site and loose to medium-dense silty/clayey sands and soft to firm sandy clays in the northern and western portions of the project site with an expansion index within the 0–20 range (Appendices G1 and G2). Therefore, the expansion potential is very low, according to the Table 18-1-B classification. Furthermore, expansive soils are considered to be a minor threat to limited parts of the County (County of San Diego 2017).

None of the proposed project features would cause any of the geologic conditions associated with expansive soils because the project would not import expansive soils into the project site or affect groundwater depth. Therefore, construction and operation of the proposed project would not have the potential to exacerbate conditions that would result in expansive soil impacts. Impacts would be less than significant.

Impact Determination

Implementation of the proposed project would not exacerbate the potential for impacts associated with expansive soils. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 5: Would the proposed project involve soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Impact Discussion

No septic tanks or alternative wastewater disposal systems are proposed as part of the proposed project. As such, there would be no potential for the proposed project to result in impacts associated with septic tanks or alternative wastewater disposal systems.

Impact Determination

The proposed project does not feature the use of septic tanks, nor alternative wastewater disposal systems. No impact would occur.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

No impact would occur.

Threshold 6: Would the project require more than 1,000 cubic yards of excavation and more than 10 feet deep in an area considered to have high paleontological sensitivity OR would the project require more than 2,000 cubic yards of excavation and more than 10 feet deep in an area considered to have moderate paleontological sensitivity?

Impact Discussion

As discussed in Section 3.6.2.3, Paleontological Setting, the Friars Formation is present underneath the entire project site and is designated as having a high sensitivity for paleontological resources. The formation is rich in vertebrate fossils, especially terrestrial mammals, such as primates, rodents, artiodactyls, and perissodactyls, well-preserved remains of marine microfossils and macroinvertebrates; remains of fossil leaves have also been recovered from the Friars Formation.

Implementation of the proposed project would include ground-disturbing activities, such as grading, which would extend deeper than 10 feet and result in more than 1,000 cubic yards of earthwork and excavation. Grading is expected to consist of cuts and fills on the order of 10 feet and 20 feet to create building pads, install streets, and raise the southern portion of the project site (near the San Diego River) approximately 10 feet to 20 feet. Grading would require 214,043 cubic yards (CY) of raw cut, and 532,531 CY of raw fill for a net import of approximately 318,488 CY. Although it is unknown whether the grading would be deep enough to encounter the Friars Formation,

the potential exists; due to the fact that the Friars Formation is associated with a high sensitivity, the proposed project would have the potential to significantly affect paleontological resources (**Impact GEO-3**), pursuant to “Supplemental Threshold for Paleontological Resources Located within the City of San Diego” (Section 3.6.2.3, Paleontological Setting).

Impact Determination

Implementation of the proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature should grading be deep enough to encounter the Friars Formation. This would be a potentially significant impact.

Mitigation Measures

City of Santee and City of San Diego

To mitigate for **Impact GEO-3**, implement **MM-GEO-2**.

MM-GEO-2. Paleontological Monitoring in Areas of Sensitivity. To address potentially significant impacts to paleontological resources, a monitoring program will be implemented.

To reduce potential impacts on paleontological resources, all proposed grading and excavating to depths greater than 10 feet will be monitored by a qualified paleontologist(s) and approved by the City of Santee, notification would be provided to the City of San Diego, and monitoring would be paid for by the project proponents. Specifically, the project proponent and/or its construction supervisor will ensure that the following measures are implemented:

- **Preconstruction Personnel and Repository:** Prior to approval of grading permits, a qualified project paleontologist will be retained to oversee the mitigation program. A *qualified project paleontologist* is a person with a doctorate or master’s degree in paleontology, or a related field, and who has knowledge of the County of San Diego paleontology and documented experience in professional paleontological procedures and techniques. In addition, a regional fossil repository, such as the San Diego Natural History Museum, will be designated by the City of Santee or the City of San Diego depending upon where the resource is found, to receive any discovered fossils.
- **Preconstruction Meeting:** The project paleontologist will attend the preconstruction meeting to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues.
- **Preconstruction Training:** The project paleontologist will conduct a paleontological resource training workshop to be attended by earth-excitation personnel.
- **During-Construction Monitoring:** A project paleontologist or paleontological monitor will be present during all earthwork in formations with moderate to high paleontological sensitivity. A paleontological monitor (working under the direction of the project paleontologist) will be on site on a full-time basis during all original cutting of previously undisturbed deposits of Pleistocene terrace deposits (moderate paleontological potential), ancient landslide deposits (moderate paleontological potential), Stadium Conglomerate (high paleontological potential), and Friars Formation (high paleontological potential) to inspect exposures for unearthed

fossils. Areas to be monitored will include, but would not be limited to, the majority of the proposed project.

- **During-Construction Fossil Recovery:** If fossils are discovered, then the project paleontologist (or paleontological monitor) will recover them. In most cases, fossil salvage can be completed in a short period of time. However, some fossil specimens (e.g., a bone bed or a complete large mammal skeleton) may require an extended salvage period. In these instances, the project paleontologist (or paleontological monitor) has the authority to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. A regional fossil repository, such as the San Diego Natural History Museum, will be designated by the City of Santee or the City of San Diego depending upon where the resource is found, to receive any discovered fossils.
- **Post-Construction Treatment:** Fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, and cataloged.
- **Post-Construction Curation:** Prepared fossils, along with copies of all pertinent field notes, photos, and maps, will be deposited in the designated fossil repository.
- **Post-Construction Final Report:** A final summary paleontological mitigation report that outlines the results of the mitigation program will be completed and submitted to the City of Santee within 2 weeks of the completion of each construction phase of the proposed project. This report will include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, inventory lists of cataloged fossils, and significance of recovered fossils.

Level of Significance After Mitigation

After implementation of **MM-GEO-2**, **Impact GEO-3** would be reduced to less-than-significant levels because the recommended monitoring of any ground-disturbing activities that occur 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site or unique geological feature. Impacts would be less than significant with mitigation incorporated.

3.6.6 Cumulative Impacts and Mitigation Measures

The geographic context for the analysis of impacts resulting from seismic ground shaking is generally site-specific, rather than cumulative in nature, because each cumulative project site has unique geologic considerations that would be subject to uniform site development and construction standards. Potential cumulative impacts resulting from geological, seismic, and soil conditions would be minimized on a site-by-site basis to the extent that modern construction methods and code requirements provide. Nevertheless, even though adequate study, design, and construction measures can be taken to reduce potential impacts, cumulative development in the region would contribute to the cumulative increase in the number of persons exposed to these hazards (e.g., the general seismic risk that exists throughout Southern California).

The only issue where the geographic context for the analysis of impacts must be taken into account is Threshold 2, which analyzes soil erosion and topsoil loss. This issue would be limited to each cumulative project site and the immediately surrounding area. Proposed cumulative projects listed in Table 3.6-1 provides a summary of the project's mitigation measures for significant geology and soils impacts.

that are within close proximity and within the same localized watershed include the Ukrainian Catholic Church located upstream at 9308 Carlton Oaks Drive, and the Shell Gas Station located downstream at 7757 Mission

Gorge Road. Erosion, including loss of topsoil, could occur as a result of site-preparation activities associated with development of these projects.

Cumulative Threshold 1: Would implementation of the proposed project contribute to significant cumulative impacts related to seismic ground shaking?

As discussed above, the project site is not within an Earthquake Fault Zone, as defined by the Alquist-Priolo Act, nor is it susceptible to landslides. However, the proposed resort is within a zone with liquefiable layers that is classified as having a moderate to high liquefaction potential (Appendices G1 and G2). Residential West and Residential North have a low potential. Development on the project site would comply with the CBC, which sets stringent seismic safety standards, and would follow the recommendations set forth in the geotechnical investigations (Appendices G1 and G2), as required by **MM-GEO-1**. Therefore, the contribution of the proposed project to impacts associated with exposing people and property to ground-shaking effects (specifically liquefaction) would not be cumulatively considerable.

Cumulative Threshold 2: Would implementation of the proposed project contribute to significant cumulative impact related to soil erosion or the loss of topsoil?

As discussed above, the only issue where the geographic context for the analysis of impacts must be taken into account is for soil erosion and topsoil loss. This issue would be limited to each cumulative project site and the immediately surrounding area. Proposed cumulative projects listed in Table 3.6-1 provides a summary of the project's mitigation measures for significant geology and soils impacts.

that are within close proximity and within the same localized watershed include the Ukrainian Catholic Church, located upstream at 9308 Carlton Oaks Drive, and the Shell Gas Station , located downstream at 7757 Mission Gorge Road. Erosion, including loss of topsoil, could occur as a result of site preparation activities associated with development of these projects.

The two cumulative projects listed, the Ukrainian Catholic Church and the Shell Gas Station, are subject to state and local runoff- and erosion-prevention requirements, including the General Construction Permit, applicable BMPs, and NPDES requirements, as well as implementation of fugitive dust-control measures of the San Diego Air Pollution Control District. Construction activities under the proposed project would comply with the aforementioned requirements, as well as with the City of Santee's Excavation and Grading Ordinance and the CBC, specifically Chapter 18 (Soils and Foundations), which regulates excavation activities, grading activities, and the construction of foundations and retaining walls. These measures will be implemented as conditions of approval for all development projects and are subject to continuing enforcement.

The proposed project would follow the recommendations set forth in the site-specific geotechnical investigations (Appendices G1 and G2). Similar to the proposed project, cumulative projects would also be expected to follow recommendations of their site-specific geotechnical studies, the City of Santee or the City of San Diego's Excavation and Grading Ordinance, and the CBC. Therefore, the proposed project would not contribute to a significant cumulative impact associated with soil erosion and loss of topsoil. The proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 3: Would implementation of the proposed project contribute to significant cumulative impact related to geologic stability?

As discussed previously, potential geology and soils effects are inherently restricted to the areas proposed for development and would not contribute to cumulative impacts associated with other planned or proposed development. Nevertheless, when considering the impacts in a larger geographic context, the project site and surrounding projects are required to undergo analysis of geological and soil conditions applicable to the development site in question. The proposed project would be required to comply with the recommendations set forth in the site-specific geotechnical investigations (Appendices G2 and G2), as required by **MM-GEO-1**, because the site is located on an unstable geologic unit, where construction activities could loosen soil compaction in such a way that there could be an increase in the potential for lateral spreading or soil collapse. Because restrictions on development would be applied in the event that geological or soil conditions were to pose a risk to safety, cumulative impacts from development of other projects on soils that are subject to soil instability would be less than significant, and the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 4: Would implementation of the proposed project contribute to significant cumulative impact related to expansive soils?

The site-specific geotechnical investigations found that the project site is underlain by soils with an expansion potential of very low. No mitigation or remediation measures are required. Therefore, potential geological impacts associated with expansive soils would not be cumulatively significant. The proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 5: Would implementation of the proposed project contribute to significant cumulative impact related to septic tanks?

The proposed project and cumulative projects would not propose the use of septic tanks or alternative wastewater systems because they would be served by either the City of Santee or the City of San Diego's sewer system, as described under Threshold 5. Therefore, no significant cumulative impact related to wastewater disposal systems would occur, and the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 6: Would implementation of the proposed project contribute to significant cumulative impact related to paleontological resources?

Cumulative projects throughout the City of Santee and the City of San Diego have the potential to disturb geologic formations and the fossils that they contain. However, monitoring for paleontological resources is now typically required for projects that involve significant earthwork in geologic units with moderate to high paleontological sensitivities. Because the proposed project would require implementation of a paleontological monitoring program for areas with the highest potential for buried fossil resources (i.e., **MM-GEO-2**), additional discoveries may be added to the region's natural history record as a result of project development. Mitigation would prevent the harm or destruction of potentially highly valuable paleontological resources and allow these resources to be properly documented and preserved. Therefore, the proposed project's contribution would not be cumulatively considerable.

3.6.7 Summary of Significant Impacts

Table 3.6-1 provides a summary of the project's mitigation measures for significant geology and soils impacts.

Table 3.6-1. Summary of Significant Geology and Soils Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact GEO-1: Potential to Exacerbate Conditions That Would Result in Liquefaction (Santee)	MM-GEO-1: Geotechnical Recommendations.	Less than significant	The proposed project is within a zone with liquefiable layers that is classified as having a moderate to high liquefaction potential, with the exception of Residential West and Residential North, which have a low potential. Implementation of MM-GEO-1 would require the developer to implement the geotechnical recommendations to remediate the liquefiable soils condition to below the threshold.
Impact GEO-2: Potential to Exacerbate Conditions That Would Result in Lateral Spreading or Soil Collapse (Santee)	MM-GEO-1: Geotechnical Recommendations.	Less than significant	With implementation of MM-GEO-1 and compliance with regulations, potential impacts would be less than significant because compliance with regulations such as the California Building Code, the City of San Diego's Municipal Code, and the City of Santee's Municipal Code would be demonstrated in the geotechnical investigation that would include recommendations for design and construction practices.
Impact GEO-3: Potential to Disturb Buried Paleontological Resources	MM-GEO-2: Paleontological Monitoring in Areas of Sensitivity.	Less than significant	Impacts would be reduced to a less-than-significant level because the recommended monitoring of any ground-disturbing activities that occur 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site or unique geological feature.

3.6.8 References

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3.7 Greenhouse Gas Emissions

3.7.1 Overview

This section describes the environmental and regulatory setting for greenhouse gas (GHG) emissions, including a discussion of the current state of climate change science, GHG emission sources in California, and applicable regulations. It also quantifies GHG emissions that would result from implementation of the proposed Carlton Oaks Country Club and Resort Project (project), discusses the potential contribution of project-generated GHG emissions to global climate change, evaluates the proposed project's consistency with plans to reduce GHG emissions, and identifies mitigation for significant impacts where feasible and appropriate. Information in this section is informed by the *Carlton Oaks Country Club and Resort Greenhouse Gas Assessment* completed by Ldn Consulting Inc., dated January 31, 2025 (Appendix C1) and the *Carlton Oaks Country Club Driving Range Remediation Memo* (Appendix B2).

Pursuant to California Public Resources Code (PRC) Section 21061 and California Environmental Quality Act (CEQA) Guidelines Section 15150, this analysis incorporates by reference information in the *Santee General Plan Update Environmental Impact Report* City of Santee 2003). Where information is incorporated by reference, that information is briefly described or summarized (State CEQA Guidelines Section 15150[c]).

3.7.1.1 Existing Conditions

The project site is relatively flat to gently sloping terrain and currently consists of a 145-acre, 18 hole golf course and country club structures, including a 52-room motel-type hotel. The existing buildings comprise several structures in the northeastern area of the site (PA-2) that are clustered around a surface parking lot. The hardscape is approximately 106,000 square feet making up the on-site parking and roadways. The existing two-story hotel is positioned along the southern side of the parking lot. The single-story clubhouse is to the west of the hotel, with a pool patio at the front, parking lot side of the building, and a second patio along the back, golf course side of the building. In addition, four 2-unit casitas (i.e., cabins) and one 1-unit casita provide additional lodging space on the northern edge of the project site (backing up to Carlton Oaks Drive). The casitas are all single-story wooden structures, resembling houses. The existing golf course has roots dating back to the 1950s and was last renovated in 1989.

3.7.1.2 Driving Range Remedial Work

In 2023, as part of the existing golf course's continued operations, soil extracted from another project was transported to the project site to create a berm to aid in golf ball retention. In total, approximately 1,000 cubic yards were moved to the existing driving range during a year-long period. A small bulldozer was used to spread the soil on the site's natural surface contours to create a berm along the outer edge of the driving range, adjacent to Sycamore Canyon Creek. No subsurface disturbance occurred as a result of the soil deposition.

On August 19, 2024, the City of Santee issued a Notice of Violation to the landowner of the project site. The Notice of Violation identified the transportation of the dirt to the driving range without the required permit as a violation of the City of Santee's Municipal Code. The applicant was directed to remove the transported dirt from the driving range and restore the area to preconstruction conditions to the satisfaction of the City of Santee Engineer. The appropriate regulatory agencies were also informed of the potential violation and requested that any restoration be completed prior to the raptor season of 2025.

By the end of 2024, the soil and berm were removed, and the soil was transported off site. The driving range at the project site was returned to its existing topographic contours prior to the soil deposition. The remediation work involved removing the soil and berm from the driving range to restore the site to its original condition. The 1,000 cubic yard of soil was transported off site to a residential construction site located just north of Robertson Street and west of Day Street in the unincorporated town of Ramona approximately 25 miles away. Equipment used for this effort involved a 966 loader, a D6 dozer, and a water equipment truck for dust control.

Although the potential remedial measures are not components of the currently proposed project, the City of Santee has requested that the Environmental Impact Report (EIR) include information regarding these remedial measures for informational purposes, which is more particularly described in the *Carlton Oaks Country Club Driving Range Remediation Memo* (Appendix B2). The project that the soil originated from, included in its CEQA analysis the transportation of the dirt off site to another location, but instead, the soil was moved a shorter distance to the project site. Therefore, Appendix B2 only includes the trips needed to remove the dirt from the project site and move it to the area in Ramona. Conservatively, the daily air emissions from the remediation work was determined not to exceed the screening level significance thresholds as more particularly described in the *Carlton Oaks Country Club Driving Range Air Quality and Greenhouse Gas Letter* (Appendix B2).

3.7.2 Environmental Setting

3.7.2.1 Physical Scientific Basis of Greenhouse Gas and Climate Change

Certain gases in the Earth's atmosphere, classified as GHGs, play a critical role in determining the Earth's surface temperature. Solar radiation enters the atmosphere from space. A portion of the radiation is absorbed by the Earth's surface, and a smaller portion of this radiation is reflected toward space. The absorbed radiation is then emitted from the Earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. The Earth has a much lower temperature than the sun; therefore, the Earth emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on Earth.

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These six gases are also identified as GHGs in Section 15364.5 of the State CEQA Guidelines. Human-caused emissions of these GHGs in excess of natural ambient concentrations are found to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as *global climate change* or *global warming*. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forcing (IPCC 2014).

Since the Industrial Revolution (1760–1840), increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere. Rising atmospheric concentrations of GHGs in excess of natural levels enhance the greenhouse effect, which contributes to global warming of the Earth's lower atmosphere. This warming induces large-scale changes in ocean-circulation patterns, precipitation patterns, global ice cover, biological distributions, and other changes to the Earth's system that are collectively referred to as *climate change*.

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas most pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any GHG molecule depends on multiple variables and cannot be determined with any certainty, it is understood that more CO₂ is emitted into the atmosphere than is removed from the atmosphere (i.e., *sequestered*) by ocean uptake, vegetation, and other forms of sequestration. Of total annual human-caused CO₂ emissions, approximately 55% are estimated to be sequestered through ocean and land uptake every year, averaged over the last 50 years, whereas the remaining 45% of human-caused CO₂ emissions remain stored in the atmosphere (IPCC 2013).

No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

3.7.2.2 Principal Greenhouse Gases

The GHGs listed by the IPCC (2014)—CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆—are discussed in this section in order of abundance in the atmosphere, and the principal characteristics surrounding these pollutants are discussed below. California law and the State CEQA Guidelines contain a similar definition of GHGs (Health and Safety Code Section 38505[g]; 14 CCR 15364.5). Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic sources. Consequently, the primary GHGs of concern associated with the proposed project are CO₂, CH₄, N₂O, and HFCs. Note that PFCs and SF₆ are not discussed because emissions of those gases would be insignificant or generated primarily by processes that would not be anticipated to be part of the proposed project.

- **CO₂** enters the atmosphere from the burning of fossil fuels (e.g., oil, natural gas, coal); it also comes from solid waste, trees and wood products, respiration, and chemical reactions (e.g., those associated with cement manufacturing). CO₂ is also sequestered when it is absorbed by plants as part of the biological carbon cycle.
- **CH₄** is emitted during the production and transport of coal, natural gas, and oil. It also results from livestock emanations, agricultural practices, and the decay of organic waste in municipal solid waste landfills.
- **N₂O** is emitted during agricultural and industrial activities as well as the combustion of fossil fuels and solid waste.
- **HFCs** are used mainly as refrigerants in air conditioning systems; HFCs can be emitted from vehicles that have been equipped with air conditioning.

Methods have been set forth to describe emissions of GHGs in terms of a single gas to simplify reporting and analysis. The most commonly accepted method for comparing GHG emissions is the global warming potential (GWP) methodology, as defined by the IPCC (IPCC 2007). IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalent (CO₂e), which compares the gas in question to that of the same mass of CO₂ (which has a GWP of 1, by definition). The GWP values used are based on reporting guidelines from the IPCC's Fourth Assessment Report (2007) and United Nations Framework Convention on Climate Change (see Table 3.7-1). The Fourth Assessment Report GWP values are consistent with those used in the California Air Resources Board's (CARB's) 2020 California GHG inventory (CARB 2022a).

Table 3.7-1. Lifetime, GWP, and Atmospheric Abundance of Select Greenhouse Gases

Gas	GWP (100 years)	Lifetime (years) ¹	Atmospheric Abundance
CO ₂	1	-2	400 ppm
CH ₄	25	12	1,834 ppb
N ₂ O	298	114	328 ppb
HFC-134a	1,430	14	35 ppt
HFC-410A	2,088	-2	-2
HFC-404A	3,922	-2	-2

Sources: IPCC 2007; CARB 2022a.

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; HFC = hydrofluorocarbon; GWP = global warming potential; ppb = parts per billion; ppm = parts per million; ppt = parts per trillion.

¹ Defined as the half-life of the gas.

² Data not provided by CARB or IPCC.

3.7.2.3 Greenhouse Gas Inventory

A *GHG inventory* is a quantification of all GHG emissions within a selected physical and/or economic boundary. GHG inventories can be performed on a large scale (e.g., for global and national entities) or on a small scale (e.g., for a particular building or person). Although many emissions processes are difficult to evaluate, several agencies have developed tools to quantify emissions from certain sources.

As discussed previously, GHG emissions are attributable in large part to human activities. The total GHG inventory for California in 2020 was 369.2 million metric tons of carbon dioxide equivalents (MMTCO_{2e}) (CARB 2022a). This is nearly 62 MMTCO_{2e} less than the 2020 target of 431 MMTCO_{2e} as set forth by Assembly Bill (AB32, which is discussed further below. Table 3.7-2 summarizes a breakdown of the statewide GHG inventory for California.

Table 3.7-2. Statewide Greenhouse Gas Emissions by Economic Sector for 2020¹

Sector	Percentage
Transportation	38
Industrial	23
Electricity Generation (In-state)	11
Electricity Generation (Import)	5
Agriculture	9
Residential	8
Commercial	6
Total	100

Source: CARB 2022a.

¹ The total emissions inventory for California in 2020 was 369.2 million metric tons of carbon dioxide equivalent.

On a local scale, the GHG emissions that would be generated by the proposed project are relevant in the context of the City of Santee's GHG emissions because most project components that are anticipated to generate GHGs would be in the City of Santee. The *Sustainable Santee Plan* (SSP) includes baseline GHG inventories for 2005 and 2013 that identify the sources and levels of GHG emissions produced by residents and businesses within the community in addition to municipal operations (City of Santee 2019). The 2005 and 2013 inventories address the following emission sectors: on-road transportation, residential energy, commercial energy, solid waste, water and

wastewater, and off-road sources. Community-wide GHG emissions were also projected for 2020, 2030, and 2035 under a business-as-usual (BAU) scenario and an adjusted BAU scenario. The BAU scenario assumes that historical data/trends are representative of future-year consumption rates for energy, water, and waste. However, the BAU scenario does not consider federal and state policies that will reduce emissions in the future. Table 3.7-3 provides a summary of the City of Santee's baseline emissions and forecast BAU emissions.

Table 3.7-3. Santee Baseline and Forecast (Business-as-Usual) Greenhouse Gas Emissions and Percent Contributions¹

Sector	Percentage	Community-Wide Baseline and Forecast GHG Emissions by Sector (MTCO ₂ e) (percent of total emissions)				
		2005	2013	2020	2030	2035
On-Road Transportation	53–62	181,812	242,499	264,162	398,992	318,334
Residential Energy	19	63,544	78,651	83,753	91,986	96,401
Commercial Energy	11–12	37,697	48,025	49,467	56,486	60,362
Solid Waste	2.5–4.8	16,376	11,151	11,861	12,651	13,066
Water and Wastewater	1.7–3.6	12,313	7,549	8,029	8,565	8,845
Off-Road Sources	3.6–8.3	28,320	14,699	15,710	17,490	18,454
Total		339,972	402,574	432,982	486,170	515,462

Sources: City of Santee 2019.

Notes: GHG = greenhouse gas; MTCO₂e = metric tons of carbon dioxide equivalent.

¹ Totals may not add up because of rounding.

On-road transportation emissions make up the largest portion of GHG emissions in the City of Santee. Increases in GHG emissions from baseline years 2005 and 2013 to forecast years 2020, 2030, and 2035 are due primarily to anticipated future population growth and the related consumption of energy, fuel, and water in the City of Santee. Assuming BAU, community-wide GHG emissions are anticipated to increase by 7.6% in 2020 compared with 2013 levels, by 20.8% in 2030 compared with 2013 levels, and by 28% in 2035 compared with 2013 levels. However, as mentioned previously, the forecast BAU emissions do not include anticipated GHG emissions reductions due to programs and regulations, applied at the federal and state levels, such as vehicle fuel efficiency standards, low-carbon fuel standards, and renewable energy portfolio requirements.

Table 3.7-4 further outlines the most recent global, national, statewide, and local GHG inventories to help contextualize the magnitude of potential project-related emissions.

Table 3.7-4. Global, National, State, and Local Greenhouse Gas Emissions Inventories

Emissions Inventory	CO ₂ e (metric tons)
2017 IPCC Global GHG Emissions Inventory	53,500,000,000
2020 USEPA National GHG Emissions Inventory	5,981,400,000
2020 CARB State GHG Emissions Inventory	369,200,000
2019 City of San Diego GHG Emissions Inventory	10,532,000
2013 City of Santee GHG Emissions Inventory	402,574

Sources: CARB 2022a; City of San Diego 2022a; City of Santee 2019; IPCC 2018a; USEPA 2022a.

Notes: GHG = greenhouse gas; CO₂e = carbon dioxide equivalent.

3.7.2.4 Potential Climate Change Effects

Climate change is a complex process that has the potential to alter local climatic patterns and meteorology. Although modeling indicates that climate change will result in sea-level rise, both globally and in San Diego Bay, as well as changes in climate and rainfall, among other effects, there remains uncertainty about characterizing precise local climate characteristics and predicting how various ecological and social systems will react to climate changes at the local level. Regardless of this uncertainty, it is widely understood that substantial climate change has occurred and will continue to occur in the future, although the precise extent will take further research to define. Specifically, the effects of global climate change in California and worldwide include the following:

- Declining sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates, with a corresponding increase in atmospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures (CNRA 2018).
- Rising average global sea levels, due primarily to thermal expansion in the oceans and the melting of glaciers, ice caps, and the Greenland and Antarctic ice sheets (IPCC 2018b).
- Changing weather patterns, including changes in precipitation and wind patterns, and more energetic episodes of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and intense tropical cyclones (IPCC 2018b).
- Declining Sierra Nevada snowpack levels, which account for approximately half of the surface water storage in California. Snow levels could decline by 70% to as much as 90% over the next 100 years (CNRA 2018).
- Increases in the number of days that could be conducive to ground-level ozone formation (e.g., clear days with intense sunlight) by the end of the 21st century in areas with high levels of ozone. The number of days could increase by 25% to 85%, depending on the future temperature scenario (CNRA 2018).
- Increases in the potential for erosion of California's coastlines as well as seawater intrusion into the Sacramento Delta and associated levee systems due to the rise in sea level (CNRA 2018).
- The severity of drought conditions in California could be exacerbated (e.g., durations and intensities could be amplified, ultimately increasing the risk of wildfires and consequential damage) (CNRA 2018).
- Under changing climate conditions, agricultural operations are forecast to experience lower crop yields due to extreme heat waves, heat stress, increased water needs of crops and livestock (particularly during dry and warm years), and new and changing pest and disease threats (CNRA 2018).

The impacts of climate change, such as increases in the number of heat-related events, droughts, and wildfires, pose direct and indirect risks to public health, with people experiencing worsening episodes of illness and an earlier death. Indirect impacts on public health include increases in incidents of vector-borne diseases, stress, and mental trauma due to extreme events and disasters, economic disruptions, and residential displacement (CNRA 2018).

3.7.3 Applicable Laws and Regulations

3.7.3.1 Federal

Several federal Executive Orders (EOs) related to GHG emissions and climate resiliency were signed by President Joe Biden. EO 13990, signed in January 2021, set a national goal that calls for achieving a 50% to 52% reduction, from 2005 levels, in economy-wide net GHG emissions by 2030. EO 14057, signed in December 2021, requires federal agencies to develop strategic processes for achieving, among other things, carbon-free electricity by 2030 and 100% zero-emission vehicle acquisitions by 2035. President Joe Biden has also signed two bills—the

Infrastructure Investment and Jobs Act (2021) and Inflation Reduction Act (2022)—that provide funding for infrastructure improvements, which will reduce GHG emissions and bolster resilience to climate change. Despite these actions, there is currently no federal law or legislatively mandated national GHG reduction target.

Corporate Average Fuel Economy Standards

The National Highway Traffic Safety Administration's (NHTSA's) Corporate Average Fuel Economy (CAFE) standards require substantial improvements in fuel economy and reductions in GHG emissions generated by passenger cars and light-duty trucks sold in the United States. On August 2, 2018, the U.S. Environmental Protection Agency (USEPA) and NHTSA proposed amendments to the current fuel efficiency standards for passenger cars and light-duty trucks as well as new standards for model years 2021 through 2026. Under the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, current 2020 standards would be maintained through 2026. On September 19, 2019, USEPA and NHTSA issued a final action on the One National Program Rule, which is considered Part One of the SAFE Vehicles Rule and a precursor to the proposed fuel efficiency standards. The One National Program Rule enables USEPA and NHTSA to provide nationwide, uniform fuel economy and GHG vehicle standards by: (1) clarifying that federal law preempts state and local tailpipe GHG standards; (2) affirming NHTSA's statutory authority to set nationally applicable fuel economy standards; and (3) withdrawing California's Clean Air Act (CAA) preemption waiver to set state-specific standards.

USEPA and NHTSA published their decision to withdraw California's waiver and finalize regulatory text related to the preemption on September 27, 2019 (84 *Federal Register* [FR] 51310). California, 22 other states, the District of Columbia, and two cities filed suit against Part One of the SAFE Vehicles Rule on September 20, 2019 (*California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia). On October 28, 2019, the Union of Concerned Scientists, Environmental Defense Fund, and other groups filed a protective petition for review after the federal government sought to transfer the suit to the D.C. Circuit (*Union of Concerned Scientists v. National Highway Traffic Safety Administration*). The lawsuit filed by California and others was stayed pending resolution of the petition.

USEPA and NHTSA published final rules to amend and establish national CO₂ and fuel economy standards on April 30, 2020 (Part Two of the SAFE Vehicles Rule) (85 FR 24174). The revised rule changes the national fuel economy standards for light-duty vehicles from 46.7 to 40.4 miles per gallon in future years. California, 22 other states, the District of Columbia filed a petition for review of the final rule on May 27, 2020.¹

On April 22, 2021, NHTSA announced that it proposes to repeal the SAFE Vehicles Rule, Part One, allowing California the right to set its own standards (NHTSA 2021). On December 12, 2021, NHTSA repealed the SAFE Vehicles Rule, Part One. On December 19, 2021, NHTSA finalized its vehicle efficiency standards rule to reach a projected industry-wide target of 40 miles per gallon by 2026, an approximately 25% increase compare with the prior SAFE rule. Lastly, on March 9, 2022, USEPA reinstated California's authority under the CAA to implement its own GHG emission standards as well as a zero-emission vehicle (ZEV) sales mandate. This action concludes USEPA reconsideration of 2019's SAFE Vehicles Rule, Part One, by finding that the actions taken under the previous administration as a part of the SAFE Vehicles Rule, Part One, were decided in error and are now entirely rescinded (USEPA 2022b).

The current CAFE standards require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026. This will be accomplished by increasing fuel efficiency by 8% annually for model years 2024 and 2025 and 10% annually for model year 2026. Phase 2 of the Greenhouse Gas

¹ *California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia.

Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles applies to medium- and heavy-duty vehicles from model years 2019 through 2027.

On April 12, 2023, USEPA proposed two new federal vehicle standards that build on the existing CAFE and Phase 2 standards. The Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles proposes more stringent emission standards for light-duty and medium-duty vehicles from model years 2027 through 2032 and accelerates the deployment of electric and clean vehicles. The Greenhouse Gas Standards for Heavy-Duty Vehicles, Phase 3, establishes fleet mix performance standards for vocational vehicles (e.g., delivery trucks) as well as trucks that are typically used to haul freight.

3.7.3.2 State

Statewide GHG Emissions Targets and the Climate Change Scoping Plan

California has adopted statewide legislation to address various aspects of climate change and GHG emissions mitigation. Much of this legislation establishes a broad framework for the state's long-term GHG reduction and climate change adaptation program. Senate Bill (SB) 32 requires the state to reduce emissions to 40% below the 1990 level by 2030. AB 1279 requires California to achieve net-zero GHG emissions (i.e., reach a balance between the GHGs emitted and removed from the atmosphere) no later than 2045 and maintain net-negative GHG emissions from then on. It also mandates an 85% reduction in statewide anthropogenic GHG emissions (from 1990 levels) by 2045. SB 1203 requires state agencies aim to achieve net-zero GHG emissions from their operations no later than 2035, or as soon as feasible thereafter.

The state has passed legislation to address GHG emissions associated with transportation, electricity generation, and energy consumption, as summarized below.

Vehicle Efficiency and Zero-Emissions Standards

AB 1493 (Pavley I) required CARB to develop and implement regulations to reduce automobile and light-truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with the 2009 model year. Additional strengthening of the Pavley standards (referred to previously as Pavley II, now referred to as the Advanced Clean Cars measure) was adopted for vehicle model years 2017–2025 in 2012. Together, the two standards are expected to increase average fuel economy to roughly 54.5 miles per gallon in 2025.

In August 2022, CARB board members voted to approve the Advanced Clean Cars II proposal, which would dramatically reduce passenger car emissions from model years 2026 through 2035. This will require an increasing proportion of new vehicles to be zero-emission vehicles, with the goal being 100% zero-emission vehicles by 2035 (CARB 2022b).

CARB also adopted the Advanced Clean Truck Regulation to accelerate a large-scale transition to zero-emission medium- and heavy-duty vehicles. The regulation requires zero-emission medium- and heavy-duty vehicles to make up an increasing percentage of total annual sales in California between 2024 and 2035. By 2035, zero-emission truck/chassis sales will need to be 55% of Class 2b – three truck sales, 75% of Class 4 – eight straight truck sales, and 40% of truck tractor sales. By 2045, every new medium- and heavy-duty truck sold in California will be a zero-emission vehicle. Large employers, including retailers, manufacturers, and brokers, are required to report

information about shipments and shuttle services to ensure that available zero-emission trucks are purchased for their fleets.

Low-Carbon Fuel Standard

In 2007, with EO S-01-07, Governor Schwarzenegger set forth the low-carbon fuel standard for California. Under this EO, the carbon intensity of California's transportation fuels is to be reduced by at least 20% by 2030.

Legislation Associated with Electricity Generation

The state passed legislation that requires increasing use of renewables to produce electricity for consumers. Specifically, California utilities will be required to generate 52% of their electricity from renewables by 2027 (SB 100), 60% by 2030 (SB 100), 95% by 2035 (SB 1020), 95% by 2040 (SB 1020), and 100% by 2045 (SB 100/SB 1020). SB 1020 also requires state agencies to rely on 100% renewable energy and zero-carbon resources in their own facilities by 2030.

Building Energy Efficiency Standards

CCR Title 24 is referred to as the California Building Code (CBC). The CBC consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility. Of relevance to GHG emissions reductions are the CBC's energy efficiency and green building standards, as outlined below.

Part 6 – Energy Code

CCR Title 24, Part 6, is the California Energy Efficiency Standards for Residential and Nonresidential Buildings (California Energy Code). The California Energy Commission (CEC) updates the California Energy Code every 3 years with more stringent design requirements to reduce energy consumption, resulting in lower GHG emissions. The 2022 California Energy Code, which took effect on January 1, 2023, requires builders to use more energy-efficient building technologies to comply with requirements regarding energy use.

New construction and major renovations must demonstrate compliance with the current California Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The compliance reports must demonstrate a building's energy performance through use of CEC-approved energy performance software that shows iterative increases in energy efficiency, given the selection of various heating, ventilation, and air conditioning; sealing; glazing; insulation; and other components related to the building envelope.

Part 11 – California Green Building Standards Code

The California Green Building Standards Code (CALGreen) was first added to Title 24, Part 11, in 2009 as a voluntary code; it became mandatory on January 1, 2011. The most recent code, the 2022 version of CALGreen, effective January 1, 2023, institutes mandatory minimum environmental performance standards for all ground-up new construction of nonresidential and residential structures. Local jurisdictions must enforce the minimum mandatory CALGreen standards, but may adopt additional amendments for stricter requirements.

The 2022 CALGreen mandatory standards call for the following:

- Outdoor water use requirements, as outlined in a local water-efficient landscaping ordinance or the current Model Water-Efficient Landscape Ordinance, whichever is more stringent
- Water-conserving plumbing fixtures and fittings
- Sixty-five percent of construction/demolition waste to be diverted from landfills
- Electric vehicle charging stations (EVCS)
- Mandatory inspections of energy systems to ensure optimal working efficiency
- Low-pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particleboard

In addition to the mandatory CALGreen standards, the CALGreen code provides voluntary tiers for increased environmental performance standards, which can be adopted as mandatory measures by local jurisdictions. Similar to the reporting procedure for demonstrating California Energy Code compliance in new buildings and major renovations, compliance with CALGreen mandatory requirements must be demonstrated through completion of compliance forms and worksheets.

Clean Energy and Pollution Reduction Act of 2015

SB 350 was approved by the California Legislature in September 2015 and signed by Governor Brown in October 2015. Its key provisions require the following by 2030: (1) RPS of 50%, which has since been increased by subsequent legislation, as noted above, and (2) a doubling of energy efficiency by 2030, including improvements to the efficiency of existing buildings. These provisions will be implemented by future actions of the California Public Utilities Commission (CPUC) and CEC.

Solid Waste Diversion Regulations

To minimize the amount of solid waste that must be disposed of in landfills, the State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. According to AB 939, all cities and counties were required to divert 25% of all solid waste from landfill facilities by January 1, 1995, and 50% by January 1, 2000. Through other statutes and regulations, this 50% diversion rate also applies to state agencies. In order of priority, waste reduction efforts must promote source reduction, recycling and composting, and environmentally safe transformation and land disposal.

In 2011, AB 341 modified the California Integrated Waste Management Act and directed the California Department of Resources Recycling and Recovery (CalRecycle) to develop and adopt regulations for mandatory commercial recycling. As of July 1, 2012, the resulting mandatory commercial recycling required certain businesses that generate 4 cubic yards or more of commercial solid waste per week to arrange recycling services. To comply with this requirement, businesses could either separate recyclables and self-haul them or subscribe to a recycling service with mixed-waste processing. AB 341 also established a statewide recycling goal of 75%; under AB 939, the 50% disposal reduction mandate still applied to cities and counties.

Tractor-Trailer Greenhouse Gas Regulation

In 2013 CARB approved the Tractor-Trailer Greenhouse Gas Regulation to reduce GHG emissions by requiring the use of aerodynamic tractors and trailers with low-rolling-resistance tires. The regulation applies to certain Class 8

tractors manufactured for use in California and is paralleled with USEPA and NHTSA heavy-duty truck standards. This regulation was expected to reduce fuel consumption and GHG emissions from new heavy-duty trucks between 4% and 5% per year between 2014 and 2018 (USEPA 2015).

Water Conservation Act of 2009

The overall goal of SB X7-7, the Water Conservation Act of 2009, was to reduce per capita urban water use by 20% as of December 31, 2020. The state was required to make incremental progress toward this goal by reducing per capita water use by at least 10% by December 31, 2015. This act is an implementing measure of the 2017 Scoping Plan, which continued to be implemented beyond 2020. Reductions in water consumption reduce the amount of energy, as well as the emissions, associated with conveying, treating, and distributing the water; emissions from wastewater treatment are also reduced.

Cap-and-Trade Program

CARB administers the state's cap-and-trade program, which covers GHG sources that emit more than 25,000 MTCO_{2e} per year, such as refineries, power plants, and industrial facilities. This market-based approach to reducing GHG emissions provides economic incentives for achieving GHG emission reductions.

Short-Lived Climate Pollutant Reduction Strategy

In 2014, SB 605 directed CARB, in coordination with other state agencies and local air districts, to develop a comprehensive Short-Lived Climate Pollutant (SLCP) Reduction Strategy. In 2016, SB 1383 directed CARB to approve and implement the SLCP Reduction Strategy to achieve the following reductions in SLCPs:

- 40% reduction in CH₄ relative to 2013 levels by 2030
- 40% reduction in HFC gases relative to 2013 levels by 2030
- 50% reduction in anthropogenic black carbon relative to 2013 levels by 2030

SB 1383 also establishes the following targets for reducing organic waste in landfills as well as CH₄ emissions from dairy and livestock operations, as follows:

- 50% reduction in organic waste disposal relative to 2014 levels by 2020
- 75% reduction in organic waste disposal relative to 2014 levels by 2025
- 40% reduction in CH₄ emissions from livestock and dairy manure management operations relative to the livestock and dairy sectors' 2013 levels by 2030

CARB and CalRecycle have developed regulations to achieve the organic waste reduction goals under SB 1383. In January 2019 and June 2019, CalRecycle proposed new and amended regulations to CCR Title 14 and Title 27. Among other things, the regulations set forth minimum standards for organic waste collection, hauling, and composting. The final regulations took effect on January 1, 2022.

CARB adopted the SLCP Reduction Strategy in March 2017 as a framework for achieving the CH₄, HFC, and anthropogenic black carbon reduction targets set by SB 1383. The SLCP Reduction Strategy includes 10 measures to reduce SLCPs, which fit within a wide range of ongoing planning efforts throughout the state, including CARB's and CalRecycle's proposed rulemaking on organic waste diversion (discussed above).

Senate Bill 743

SB 743, passed in 2013, required revisions to the State CEQA Guidelines to establish new impact analysis criteria for the assessment of a project's transportation impacts. The intent behind SB 743, as well as the revisions to the State CEQA Guidelines, was to integrate and better-balance congestion management, infill development, active transportation, and GHG emissions reductions. The California Governor's Office of Planning and Research (OPR) recommended vehicle miles traveled (VMT) as the primary analysis metric, replacing the existing criteria of delay and level of service. In 2018, OPR released a technical advisory that outlined potential VMT significance thresholds for different project types (OPR 2018). For example, it would be reasonable to conclude that residential and office projects that demonstrate a VMT level that is 15% less than the existing condition (2015–2018 average) would be consistent with statewide GHG reduction targets. With respect to retail land uses, any net increase in VMT may indicate a significant transportation impact.

Executive Order B-16-2012

EO B-16-2012, passed in 2012, establishes benchmarks for reducing transportation-related GHG emissions. It requires agencies to implement the Plug-in Electric Vehicle Collaborative and California Fuel Cell Partnership by 2015 and sets forth targets specific to the transportation section, including the goal of reducing transportation-related GHG emissions to 80% below 1990 levels.

Senate Bill 375 – Sustainable Communities Strategy

SB 375, passed in 2008, provides a new planning process that coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction goals established in AB 32. SB 375 requires regional transportation plans, as developed by metropolitan planning organizations, to incorporate a Sustainable Communities Strategy (SCS). The goal of the SCS is to reduce regional VMT through land use planning and consequent transportation patterns. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development.

The initial reduction targets from CARB required the San Diego Association of Governments (SANDAG) to identify strategies to reduce per capita GHG emissions from passenger vehicles by approximately 7% by 2020 and 13% by 2035 compared with the base year of 2005. However, CARB is required to update the regional targets every 8 years, with an option of revising them every 4 years. As such, beginning October 1, 2018, SANDAG's reduction targets were updated to reduce per capita GHG emissions from passenger vehicles by approximately 15% by 2020 and 19% by 2035 compared with 2005 levels (CARB 2018).

Assembly Bill 1279

AB 1279 (Health and Safety Code Section 38562.2) requires California to achieve net-zero GHG emissions (i.e., reach a balance between the GHGs emitted and removed from the atmosphere) no later than 2045 and maintain net-negative GHG emissions from then on. It also mandates an 85% reduction in statewide anthropogenic GHG emissions (from 1990 levels) by 2045. AB 1279 recognizes that meeting the targets requires direct GHG emission reductions and removal of carbon dioxide from the atmosphere, along with a nearly complete transition from fossil fuels. As such, the bill directs CARB to work with relevant state agencies to ensure that Scoping Plan updates include measures that put California on a trajectory to achieve the targets. It also tasks CARB with implementing strategies that facilitate CO₂ removal solutions and carbon capture, utilization, and storage technologies. To evaluate the state's progress, AB 1279 requires that CARB report progress toward the targets to the legislature annually. By

2035, the bill directs CARB to assess the feasibility of, as well as the trade-offs associated with, reducing statewide anthropogenic GHG emissions to 85% below 1990 levels by 2045 and report its findings to the legislature.

California Air Resources Board: Scoping Plan

Under AB 32, the CARB is responsible for and is recognized as having the expertise to carry out and develop the programs and regulations necessary to achieve the GHG emissions reduction mandate of AB 32. Therefore, in furtherance of AB 32, CARB adopted regulations requiring the reporting and verification of GHG emissions from specified sources, such as industrial facilities, fuel suppliers and electricity importers (see Health and Safety Code Section 35830; Cal. Code Regs., Title 17, Sections 95100 et seq.). CARB is also required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 authorized CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a limit on the statewide GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMTCO₂e). CARB's adoption of this limit is in accordance with Health and Safety Code Section 38550. Furthermore, CARB adopted the *Climate Change Scoping Plan: A Framework for Change* (Scoping Plan) (CARB 2008) in accordance with Health and Safety Code Section 38561. The Scoping Plan established an overall framework for the measures that will be implemented to reduce California's GHG emissions for various emission sources/sectors to 1990 levels by 2020. Measures applicable to development projects included those related to energy efficiency building and appliance standards, the use of renewable sources for electricity generation, regional transportation targets, and green building strategy. In November 2017, CARB released California's *2017 Climate Change Scoping Plan* (Second Update) for public review and comment (CARB 2017). This update proposed CARB's strategy for achieving the state's 2030 GHG target as established in SB 32.

In 2022, California released the latest Scoping Plan update, which lays out the sector-by-sector roadmap for California to achieve carbon neutrality by 2045. This plan, addressing recent legislation and direction from Governor Newsom, extends and expands on these earlier plans with a target of reducing anthropogenic emissions to 85% below 1990 levels by 2045 (CARB 2022a). The plan suggests that bold steps are required by the state and calls for the need for vast research and development with respect to methods of capturing CO₂. The plan calls for unprecedented and aggressive reductions in the need for fossil fuels by moving to zero-emission transportation and electrifying cars, buses, trucks, and trains. The plan relies on external controls and requires partnership and collaboration with the federal government, other U.S. states, and other jurisdictions around the world for California to succeed in achieving its climate targets.

State CEQA Guidelines

The State CEQA Guidelines require lead agencies to describe, calculate, or estimate the amount of GHG emissions that would result from a project. Moreover, the State CEQA Guidelines emphasize the necessity to determine the potential climate change effects of a project and propose mitigation as necessary. They do not prescribe or recommend a specific analysis methodology or provide quantitative criteria for determining the significance of GHG emissions. Although the State CEQA Guidelines confirm the discretion of lead agencies in determining appropriate significance thresholds, they require preparation of an EIR if "there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with adopted regulations or requirements" (Section 15064.4).

State CEQA Guidelines Section 15126.4 includes considerations for lead agencies related to feasible mitigation measures for reducing GHG emissions, which may include measures in an existing plan or mitigation program required as part of a lead agency's decision; implementation of project features, designs, or measures that have been incorporated into a project to substantially reduce energy consumption or GHG emissions; off-site measures, including offsets that would not otherwise be required, to mitigate a project's emissions; and measures to sequester carbon or carbon-equivalent emissions.

State CEQA Guideline Section 15183.5(a) provides that a lead agency may analyze and mitigate significant effects of GHG emissions at a programmatic level, such as in a plan targeted to reduce GHG emissions. In addition, the section allows tiering off and incorporating by reference the environmental analysis done for such plans.² Subdivision (b) of Section 15183.5 also states that a plan to reduce GHG emissions may be used to find that a project's incremental contribution to the cumulative effect of GHG emissions is not cumulatively considerable if the project complies with the adopted plan and mitigation program. Subdivision (b) of Section 15183.5 provides that such a plan should: (1) quantify GHG emissions over a specific time period resulting from activities within a defined geographic area; (2) establish a level below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable; (3) identify and analyze GHG emissions resulting from specific actions or categories of actions within the defined geographic area; (4) specify measures or a group of measures, including performance standards, that, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; (5) establish a mechanism to monitor the plan's progress; and (6) be adopted in a public process following environmental review. Such plans may be used in the cumulative impact analysis of later projects, but such later project analyses must identify those requirements specified in the plan that apply to the project and, if those requirements are not otherwise binding and enforceable, incorporate them as mitigation measures.

3.7.3.3 Local

SANDAG Regional Plan

Every 4 years, SANDAG prepares and updates San Diego Forward: The Regional Plan, which provides a long-term blueprint for sustainable growth in the region. The most recent version is the 2021 Regional Plan, which was adopted by the SANDAG Board of Directors on December 10, 2021 (SANDAG 2021). The 2021 Regional Plan seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, health care, and community resources.

In accordance with SB 375, the 2021 Regional Plan includes an SCS that coordinates transportation and land use planning and exceeds the state's target for reducing per capita GHG emissions, as set by CARB. As stated previously, CARB's GHG reduction targets for SANDAG include reducing per capita GHG emissions from passenger vehicles by approximately 15% by 2020 and 19% by 2035 compared to 2005 levels (CARB 2018). The 2021 Regional Plan would achieve a 20% reduction by 2035. It also puts forth a forecast development pattern that is driven by regional goals for sustainability, mobility, housing affordability, and economic prosperity. SB 375 requires the SCS to include a pattern for forecast growth and development that accomplishes the following:

- When combined with the transportation network, the SCS will achieve the regional GHG emission reduction targets.
- The SCS will accommodate the Regional Housing Needs Assessment (RHNA) determination.

² Note that this analysis does not tier off or rely on any previous CEQA analysis conducted for a GHG plan.

- The SCS will use the most recent planning assumptions.

City of Santee

Sustainable Santee Plan

In January 2020, the City of Santee adopted the SSP, a qualified GHG-emissions reduction plan developed in accordance with State CEQA Guidelines Section 15183.5 (City of Santee 2019). The SSP provides GHG reduction goals and strategies that focus on reducing resource consumption, improving alternative modes of transportation, and reducing overall emissions throughout the City of Santee. The plan also provides policy direction and identifies actions the City of Santee and community can take to significantly reduce GHGs emissions, consistent with AB 32 and EO S-3-05.

The purpose of the SSP is to guide the development, enhancement, and ultimately implementation of actions and strategies to reduce GHG emissions in the City of Santee. In accordance with state regulations, the SSP will reduce the City of Santee's community-wide GHG emissions to 15% below 2005 levels by 2020, 40% below 2005 levels by 2030, and 49% below 2005 levels by 2035. The 2030 and 2035 interim goals would put the City of Santee on a path toward the state goal, which calls for achieving net carbon neutrality statewide by 2045, pursuant to AB 1279. In addition, in compliance with the CARB 2017 Scoping Plan update, the City of Santee is aiming to reduce community-wide emissions to a level below 3.8 MTCO_{2e} per capita by 2030 and by 3.16 MTCO_{2e} per capita by 2035.

The SSP presents community-wide GHG inventories for 2005, 2008, 2012, and 2013 as well as municipal GHG inventories for 2005 and 2013. The BAU and adjusted BAU (ABAU) forecasts are also presented for 2020, 2030, and 2035. The BAU scenario is based on projected growth in population and employment; it does not consider state and federal actions to reduce emissions in the future. The adjusted BAU scenario is based on projected growth, but also considers state and federal policies to achieve GHG reductions in the future. The GHG inventories address the following emission sectors: on-road transportation, residential energy, commercial energy, solid waste, water and wastewater, and off-road sources. Municipal GHG emissions, including emissions from energy use associated with government buildings and facilities, vehicle fleets and equipment, solid waste, streetlights, employee commutes, and water pumping, are a subset of the community-wide emissions inventory. The economic sectors considered in the community-wide GHG inventories are summarized above in Table 3.7-2.

Based on the ABAU scenario, the SSP indicated that in 2035, the service population (SP) would be 84,200, which accounts for a 17.4% population growth from 2013 to 2035. Based on the SP of 84,200 in 2035 and the emission goal of 173,386 MTCO_{2e}, the GHG reduction target would be 3.16 MTCO_{2e}/SP to meet the state Aligned Efficiency Target for 2035 (City of Santee 2019).

The SSP indicates that GHG inventories were developed using a number of planning tools, such as the SANDAG Series 12 and other models including EMFAC 2014. The BAU inventory for 2035 includes buffer forecasts to accommodate an additional 2,000 homes which were necessary for growth. Both the BAU and ABAU inventories included the residential land use buffer when forecasting GHG emissions associated with energy (electricity and natural gas consumption), water, and solid waste. The SANDAG Series 12 Transportation Model included aggressive growth rates according to the SSP, which resulted in higher levels of transportation-related travel in 2020, 2030, and 2035. The overall projections are presented in Table 3.7-5.

Table 3.7-5. State-Aligned Greenhouse Gas Reduction Targets

Sector	2005	2013	2020	2030	2035
BAU Emissions	339,972	402,574	432,982	486,170	515,462
Adjusted BAU Emissions	339,972	402,574	352,106	339,514	336,543
Service Population (Population + Jobs)	70,152	71,663	76,437	81,499	84,200
Adjusted BAU Per Capita Emissions	—	—	—	2.55	2.51
State-Aligned Performance Target (percent change from 2005)	—	—	—	-40%	-41%
State-Aligned Performance Target (MTCO _{2e})	—	—	—	203,983	173,386
Reductions from ABAU need to meet the performance target (MTCO _{2e})	—	—	—	135,531	163,157
State-Aligned Efficiency Target (MTCO _{2e} /SP)	—	—	—	3.80	3.16
Reductions from Adjusted BAU needed to meet the Efficiency Target (MTCO _{2e})	—	—	—	Target Met	Target Met

Source: City of Santee 2019.

Notes: BAU = business-as-usual; MTCO_{2e} = metric tons of carbon dioxide equivalent.

According to the data in the SSP, the BAU emission of 515,462 MTCO_{2e} in 2035 needs to be reduced to 173,386 MTCO_{2e}. The SSP indicates that through the incorporation of all SSP measures, the City of Santee would reduce emissions by 164,655 MTCO_{2e} and would generate 171,888 MTCO_{2e} in 2035 meeting the goal by 1,498 MTCO_{2e}. These numbers are presented in Table 3.7-6.

Table 3.7-6. Sustainable Santee Plan Emissions Inventory in 2035

GHG Emission Sector	GHG Emissions (MTCO _{2e})
2035 Project BAU Emissions	515,462
State and Federal Reductions	-178,919
Local Measure Reductions from all SSP Measures including CCA	-164,655
2035 Project GHG Emissions	171,888
State-Aligned Performance Target	173,386
Exceeds Reduction Target by	-1,498

Source: City of Santee 2019.

Notes: GHG = greenhouse gas; BAU = business-as-usual; MTCO_{2e} = metric tons of carbon dioxide equivalent.

To achieve these goals, the SSP identifies GHG strategies or design features that new development would need to incorporate for the City of Santee's GHG emission reductions to be achieved. The strategies are provided in Appendix D of the SSP and labeled as the SSP Consistency Checklist. This checklist provides a streamlined process for new development under CEQA (City of Santee 2019).

The City of Santee's SSP meets the requirements under Section 15183.5 of the CEQA Guidelines as a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to development projects. The Checklist provides a streamlined review process for the GHG emissions analysis of proposed new development projects that are consistent with the General Plan. In most cases, when assuming a Project is consistent with the

General Plan, it would have less than significant GHG impacts under CEQA by incorporating all applicable GHG reduction strategies.

The SSP also states that projects that do not meet the requirements of the checklist will be deemed to be inconsistent with the SSP and must prepare a project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures of the checklist to the extent feasible.

General Plan

The City of Santee's *General Plan* includes various goals, objectives, and policies related to GHG emissions (City of Santee 2017). The following goals and policies are relevant to the proposed project:

Conservation Element

Goal: The goal of the Conservation Element is to conserve open space as well as natural and cultural resources.

Policy 3.2: The City of Santee 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 4.3: The City of Santee should locate new neighborhood commercial uses along major roadways in consolidated centers that utilize common access and parking for commercial uses, discourage the introduction of strip commercial uses, and require adequate pedestrian links to residential areas.

Land Use Element

Objective 3.0: Provide and maintain the highest level of service possible for all community public services and facilities.

Policy 3.2: The City of Santee 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 4.3: The City of Santee should locate new neighborhood commercial uses along major roadways in consolidated centers that utilize common access and parking for commercial uses, discourage the introduction of strip commercial uses, and require adequate pedestrian links to residential areas.

Mobility Element

The City of Santee's *General Plan – Mobility Element* includes policies that enhance smart growth, improve traffic flow, increase the use of public transit, encourage bicycling and walking, and increase the use of alternative modes of travel, which help to reduce GHG emissions from on-road transportation.

City of San Diego

Climate Action Plan

In December 2015, the City of San Diego adopted its Climate Action Plan (CAP), which is a qualified GHG reduction plan developed in accordance with State CEQA Guidelines Section 15183.5 (City of San Diego 2015). The 2015 CAP establishes a baseline GHG emissions inventory for 2010, sets goals for GHG reductions for the milestone

years 2020 and 2035, and details implementation actions and phasing for achieving the goals. The 2015 CAP sets forth GHG emissions goals for 2020 and 2035 of 10.6 MMTCO₂e and 6.4 MMTCO₂e, respectively, to meet the state's goals of reducing emissions to 15% below 2010 levels by 2020 and 49% below 2010 levels by 2035.

In addition, the City of San Diego adopted its CAP Consistency Checklist as part of the 2015 CAP to provide a streamlined review process for proposed new development projects that are subject to discretionary review and expected to trigger environmental review pursuant to CEQA (City of San Diego 2016). Approved by the San Diego City Council in July 2016, the 2015 CAP Consistency Checklist contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the 2015 CAP are achieved. Implementation of the measures would ensure that new development would be consistent with the 2015 CAP's assumptions regarding relevant CAP strategies for achieving identified GHG reduction targets.

On August 2, 2022, the San Diego City Council approved an update to its 2015 CAP. The 2022 CAP sets an ambitious community-wide goal that calls for net-zero GHG emissions by 2035 (City of San Diego 2022a). The 2022 CAP is a qualified GHG reduction plan developed pursuant to State CEQA Guidelines Section 15183.5. The 2022 CAP establishes baseline GHG emissions for 2019, sets targets for GHG reductions for the milestone years 2030 and 2035, and details the implementation actions and phasing for achieving the goals. To meet the goal, the City of San Diego would be required to reduce GHG emissions to approximately 4.2 MMTCO₂e by 2030, with net-zero emissions by 2035. In order to achieve net-zero GHG emissions by 2035, the 2022 CAP calls for the City of San Diego to do the following:

- Phase out 90% of fossil fuel use in buildings by 2035 through electrification, appliance swaps, and other emerging technologies, thereby improving efficiency and indoor air quality.
- Work with San Diego Community Power to offer 100% renewable electricity for all customers in San Diego by 2030.
- Plan for and invest in a mobility network that shifts 50% of all trips to walking, biking, or transit and reduces the overall need for vehicle use by 2035.
- Support and accelerate the transition from combustion to electric vehicles (EVs) to account for at least 25% of light-duty VMT by 2035.
- Reduce waste production and divert 90% of waste away from the landfill by 2035.
- Restore 700 acres of wetlands and related habitats to promote carbon storage and ecosystem health.
- Achieve 35% urban tree canopy coverage by 2035 by planting and maintaining tens of thousands of trees, focusing first on underserved communities that are vulnerable to extreme heat.

The City of San Diego replaced the *2015 CAP Consistency Checklist* with the *2022 CAP Consistency Regulations*, which are codified in San Diego Municipal Code Chapter 14, Article 3, Division 14, effective October 13, 2022 (City of San Diego 2022b). The CAP Consistency Regulations replaced the 2015 CAP Consistency Checklist, providing a list of measures that can be implemented on a project-by-project basis to collectively achieve a specified emissions level, as specified by State CEQA Guidelines Section 15183.5b(1)(d). Pursuant to State CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined to not be cumulatively considerable if the project is in compliance with the requirements of the applicable CAP. However, the City of San Diego's CEQA significance determination thresholds from the *Land Development Manual* state that a land development project must also be consistent with existing *General Plan* and community plan land use and zoning designations to determine whether the project's incremental contribution to a cumulative GHG emissions effect may be determined to not be cumulatively considerable. Projects that do not

comply with the CAP Consistency Regulations must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Regulations to the extent feasible. Thus, the CAP Consistency Regulations provide applicable regulations to reduce GHG emissions from development that would be subject to CEQA review, along with applicable measures for a proposed project to demonstrate consistency with the 2022 CAP in the City of San Diego.

General Plan

The City of San Diego's *General Plan* includes various goals and policies designed to reduce GHG emissions. As discussed in the *General Plan*, climate change and GHG reduction policies are addressed in multiple chapters of the *General Plan*. The goal and policies related to GHG emissions relevant to the proposed project are included in the Conservation Element and outlined below (City of San Diego 2008). The project's consistency with the goal and associated policies is addressed in Section 3.10, Land Use and Planning.

Goal: To reduce the City of San Diego's overall carbon dioxide footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally sound waste management.

Policy CE-A.11: Implement sustainable landscape design and maintenance.

- a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers.
- b. Encourage composting efforts through education, incentives, and other activities.
- c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas, and amenities are proposed to serve as recreational opportunities.
- d. Strategically plant deciduous shade trees, evergreen trees, and drought-tolerant native vegetation, as appropriate, to contribute to sustainable development goals.
- e. Reduce use of lawn types that require high levels of irrigation.
- f. Strive to incorporate existing mature trees and native vegetation into site designs.
- g. Minimize the use of landscape equipment powered by fossil fuels.
- h. Implement water conservation measures in site/building design and landscaping.
- i. Encourage the use of high-efficiency irrigation technology and recycled water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible.

Municipal Code

To facilitate implementation of the CAP, the City of San Diego adopted the CAP Consistency Regulations in Chapter 14, Article 3, Division 14 of the Municipal Code. The CAP Consistency Regulations apply to specific ministerial and discretionary projects to ensure compliance with the goals and objectives of the updated CAP (City of San Diego 2022b).

The CAP Consistency Regulations apply to the following projects:

- Development that results in three or more total dwelling units on all premises in the development

- Nonresidential development that adds more than 1,000 square feet and results in 5,000 square feet or more of total gross floor area, excluding unoccupied spaces such as mechanical equipment and storage areas
- Parking facilities as a primary use

The CAP Consistency Regulations require the following:

1. Pedestrian enhancements to reduce heat island effect
 - a. Where the premises contains a street yard or abuts the public right of way, shading of at least 50% of the Thoroughway Zone is required.
 - b. Where development does not contain a street yard or abut a public right of way with a Furnishings Zone, a specified number of trees will be planted on site or at an off-site location within 1 mile of the development. If trees cannot be planted, then an Urban Tree Canopy Fee will be paid.
2. Development on a premises with 250 linear feet or more of street frontage will provide and privately maintain at least one of the following publicly accessible pedestrian amenities for every 250 linear feet of street frontage to the satisfaction of the Development Services Department:
 - a. One trash receptacle and one recycling container
 - b. Seating composed of movable seats, fixed individual seats, benches with or without backs, or design feature seating, such as seat walls, ledges, or seating steps
 - c. Pedestrian-scale lighting that illuminates the adjacent sidewalk
 - d. Public artwork
 - e. Community wayfinding signs
 - f. Enhancement of a bus stop or public transit waiting station within 1,000 feet of the premises
3. At least 50% of all residential and nonresidential bicycle parking spaces required in accordance with Chapter 14, Article 2, Division 5 will be supplied with individual outlets for electric charging at each bicycle parking space.

3.7.4 Project Impact Analysis

3.7.4.1 Thresholds of Significance

The State CEQA Guidelines, Appendix G (14 CCR 15000 et seq.), identify the significance criteria to be considered for determining whether a project could have significant impacts on existing GHG emissions and climate change. According to the guidelines, a project impact would be considered significant if construction or operation of the proposed project would cause either of the following:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The State CEQA Guidelines do not indicate what amount of GHG would constitute a significant impact on the environment. Instead, they authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to

adopt such thresholds is supported by substantial evidence (State CEQA Guidelines Sections 15064.4[a], 15064.7[c]). CEQA offers two paths for evaluating GHG emissions impacts in CEQA documents:

1. Projects can tier off of a “qualified” GHG reduction plan (State CEQA Guidelines Section 15183.5), or
2. Projects can determine significance by using a model to calculate GHG emissions and assess their significance (State CEQA Guidelines Section 15064.4).

Several agencies throughout the state, including multiple air districts, have drafted and/or adopted varying threshold approaches and guidelines for assessing the significance of GHG emissions in CEQA documents. However, none of these are binding; they are only recommendations for consideration by CEQA lead agencies.

Regardless of the threshold chosen, the lead agency must provide substantial evidence to support determinations. The term *substantial evidence* is defined in the CEQA statute to mean “fact, a reasonable assumption predicated on fact, or expert opinion supported by fact. Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment” (Section 21080 [d]).

Project Threshold Approach

Table 10 and Table 22 of the SSP outlines how emission reductions from SSP measures will be achieved, detailing reductions from each goal, with some coming from existing developments, some from new developments, and in some cases, both (City of Santee 2019). For goals where reductions come from both existing and new developments, reasonable assumptions were made about the distribution (refer to each goal within the SSP for more information on the anticipated reductions). For example, it is assumed that 65% of reductions in waste to landfills would come from new developments, whereas 80% of Community Choice Aggregation reductions would come from existing developments. Table 3.7-7 provides the GHG reductions from Tables 10 and 22 in the SSP.

After all the SSP reductions, the 2035 BAU Emissions from Population would be 171,888 MTCO_{2e}, as shown in Table 3.7-6 and in Table 3.7-8.

Table 3.7-8 also includes the population data for Santee to determine the SSP efficiency threshold. The emission cap of 171,888 MTCO_{2e} aligns with the overall growth projections in Santee, including new housing units, which may require a General Plan amendment and other projected growth estimates derived from tools like the SANDAG Series 12 and EMFAC 2014 (refer to Table 3.7-6). The SSP sets a 2035 projected emission cap of 171,888 MTCO_{2e} in order for the City of Santee to meet its state-aligned GHG emissions target. This means that in 2035, the City of Santee’s emissions are anticipated to not exceed 171,888 MTCO_{2e} for the estimated SP of 84,200. Breaking this down further on a per capita emission rate, the City of Santee would require that each person generate no more than 2.04 MTCO_{2e} SP (171,888 MTCO_{2e}/84,200 people). This per capita threshold would be achievable for all growth projections in Santee and includes the 2,000 units within the SSP as part of the future growth, as well as projected growth estimates, using planning tools such as the SANDAG Series 12 and EMFAC 2014 when the SSP was developed.

Given this, the 2.04 MTCO_{2e} per SP would be conservative as a project-level threshold. These planning tools consider the growth of undeveloped land uses consistent with the City of Santee’s *General Plan*, ensuring that the per capita emission rate remains realistic and achievable. Continuous monitoring and adjustments per the SSP will be required in the future, but this threshold remains feasible as growth patterns and technological advancements

evolve, allowing the City of Santee to meet its 2035 emission cap while maintaining flexibility and responsiveness to real-world data and changing conditions.

Table 3.7-7. Sustainable Santee Plan Emissions Inventory in 2035

Sustainable Santee Plan Goals	Reductions (MTCO ₂ e)
Goal 1-1.1: Energy Audits in the Existing Residential Sector – Permits for Minor Modifications (Existing Development)	45
Goal 1-1.1: Energy Audits in the Existing Residential Sector – Permits for Major Modifications (Existing Development)	7,811
Goal 2-2.1: Exceed Energy Efficiency (New Development)	17,750
Goal 3-3.1: Energy Audits in the Existing Commercial Sector – Permits for Minor Modifications (Existing Development)	660
Goal 3-3.1: Energy Audits in the Existing Commercial Sector – Permits for Major Modifications (New Development)	8,010
Goal 4-4.1: Exceed Energy Efficiency Standards	12,337
Goal 5-5.1: Tree Planting for Shading and Energy Efficiency	22
Goal 5-5.2: Light Reflecting Surfaces on Existing Buildings	1
Goal 6-6.1: Non-motorized Transportation	263
Goal 6-6.2: Implement Bicycle Master Plan	259
Goal 7-7.1: Electric Vehicle Chargers Program	47,414
Goal 8-8.1: Traffic Flow Improvement Program	2,130
Goal 9-9.1: Reduce Waste to Landfills	8,238
Goal 10-10.1: Distributed Renewable Energy Generation	2,783
Goal 11-10.2: Community Choice Aggregation Program	56,532
Total Reductions	164,655

Source: Appendix C1.

Table 3.7-8. Sustainable Santee Plan - Project-Level Service Population Efficiency Threshold

Population	2035
2035 Project Emissions from Population	171,888 MTCO ₂ e
Total Population 2035	SP = 84,200
MTCO ₂ e per SP for 2035	2.04 MTCO ₂ e/SP

Source: Appendix C1.

Notes: MTCO₂e = metric tons of carbon dioxide equivalent; SP = service population.

Thus, the project is adopting the SSP efficiency threshold of 2.04 MTCO₂e/SP, as well as consistency with the SSP CAP Checklist for the significance determination analysis. This efficiency threshold is based on the necessary reductions for the SSP to meet its 2035 state-aligned emission target; refer to Table 3.7-6 through Table 3.7-8.

3.7.4.2 Methodology

GHG and climate change impacts associated with construction and operation of the project were assessed and quantified using standard and accepted software tools, techniques, and emissions factors. A summary of the methodology is provided below. Refer to Appendix C1 for all modeling files.

Construction

Construction activities would generate emissions of CO₂, CH₄, and N₂O from mobile and stationary construction equipment, on-site water and electricity use, and employees' vehicles/haul trucks. It is expected that construction would require as many as eight phases of work to complete all tasks for Residential North, Residential West, and the hotel/golf course.³ It is anticipated that construction phases would overlap and were modeled as such.

GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2022.1.1.29. The construction emissions analysis was based on a combination of project-specific information provided by the applicant, and default assumptions generated by CalEEMod, construction modeling outputs, and detailed assumptions.

Operation

The existing development within the project site was built between the 1950s and 1989. At that time, the facilities constructed lacked advanced energy-saving technologies and would now be considered inefficient by modern standards. However, these facilities are still operational using these outdated technologies.

The existing facility emits GHGs through its daily operations, including energy consumption from electricity and natural gas, vehicle emissions from on-site traffic, waste management, water usage, and emissions from on-site landscaping activities. These emissions are quantified using CalEEMod 2022.1.1.29. Emissions from the existing project site operations were calculated based on a 2021 existing year scenario because CalEEMod does not allow for inputs prior to 2010, and 2021 would be conservative or less-energy-intense than could likely be expected within the existing development. Default settings were applied within CalEEMod for existing GHG sources, except for mobile trip estimates, which were provided by the Project Traffic Engineer at 1,588 daily trips covering 10,092 VMT (Appendix O1); refer to Appendix C1 for the existing scenario modeling files.

Additionally, a separate model was developed for project operations, incorporating all project design features (PDFs) (see Chapter 2, Project Description). Assuming the 2029 operational year, traffic for the proposed project was estimated at 3,536 trips per day and 25,710 VMT as indicated in the total vehicle miles traveled analysis memo (Appendix O1). It should be noted that the 3,536 trips and VMT estimates include existing operations. CalEEMod 2022.1.1.29 uses the 2019 Title 24 building standards as defaults, although the project would need to comply with the latest Title 24 standards in effect at the time building permits are issued. Because the 2022 Title 24 building standards are currently in effect and offer increased efficiencies, this analysis is a conservative approach.

³ Construction equipment fleets become cleaner in future years as Tier 4 Final equipment replace older construction equipment in the default construction fleet mix. Thus, modeling an earlier construction year is deemed conservative and is likely overestimating construction emissions versus later years.

Project Design Features

The proposed project would incorporate PDFs to reduce GHG emissions. PDF-1 through PDF-10 encompass a range of strategies aimed at enhancing energy efficiency, promoting sustainable transportation, and implementing environmentally conscious practices across the development (see Chapter 2, Project Description, for the full text of the PDFs). Following each PDF title below, an overview of the methodology used to assess the anticipated GHG emissions reductions associated with its implementation is provided in italic text.

PDF-1: California Energy Code.

GHG-emissions reductions for PDF-1 were calculated within CalEEMod 2022.1.1.29 for the (2019) Title 24 standards. The project will implement the latest Title 24 building standards when building permits are requested. Because Title 24 (2019) is used in CalEEMod, this PDF would actually generate more GHG reductions when implementing the latest Title 24 standards for buildings constructed by the Carlton Oaks Country and Club Resort Project.

PDF-2: CALGreen Code.

GHG-emissions reductions for PDF-2 were calculated within CalEEMod 2022.1.1.29 for the (2019) CALGreen standards. The project will implement the latest CALGreen standards when building permits are requested. Because 2019 CALGreen standards are used in CalEEMod, this PDF would actually generate more GHG reductions when implementing the latest CALGreen standards for buildings constructed by the Carlton Oaks Country and Club Resort Project.

PDF-3: Electric-Only Uses.

To establish GHG-emissions reductions for PDF-3, the natural gas–energy usage estimated by CalEEMod was converted for each land use (excluding the restaurant) from thousands of British thermal units (kBtu)/year to electrical energy usage (in kWh/year), using a standard conversion rate of 3.412 kBtu/kWh. CalEEMod was manually updated to reflect the increased kWh per year. This approach is conservative because electrical appliances tend to convert a higher proportion of energy into usable heat as compared to gas appliances. Gas appliances typically generate waste heat. For example, a gas water heater is typically attached to exhaust pipes to expel waste heat or heat not transferred to the water. An electric water heater would not require an exhaust pipe. For simplicity, we assumed that all waste heat would be included in the converted electrical demand.

PDF-4: Energy Star Appliances.

GHG-emissions reductions for PDF-4 were calculated within CalEEMod, based on the expected energy savings resulting from the use of ENERGY STAR-rated appliances, as compared to conventional appliances. Specifically, this reduction measure was applied to the residential uses, hotel, and restaurant.

PDF-5: Low-Flow Water Appliances.

GHG-emissions reductions for PDF-5 were estimated by including low-flow fixtures for all toilets, urinals, showerheads, bathroom faucets, kitchen faucets, and dishwashers. These reductions

were calculated within CalEEMod, and the results provide a reduction in water usage and reduction in the energy required for water heating, conveyance, and treatment.

PDF-6: [Recyclables and Yard Waste.](#)

Under AB 341 and the City of Santee's SSP to reduce waste, adopted in April 2017, the County would ultimately be required to increase diversion of waste from landfills for commercial waste. The project would provide separate waste containers for all uses to allow for simpler material separations or would direct the project residents to pay for a waste-collection service that recycles materials off site. Additionally, the project would provide for green-waste collection so that green waste is diverted from landfills and recycled as mulch. A City of Santee action goal would divert 70% of total waste from the landfill by 2030. This PDF ensures that the project is consistent with this goal. To be conservative, however, CalEEMod was updated to include only a 25% waste-diversion goal, which would reduce waste GHG emissions by 25%. The calculations are provided within CalEEMod.

PDF-7: [Residential Electric Vehicle Charging.](#)

The reduction in GHG emissions was evaluated by examining the emissions decrease linked to promoting EV adoption through the installation of EV-charging infrastructure.

The proposed project involves installing Level 2 EVCS (i.e., 220-volt chargers) in the garages of each of the 242 residential units. It is anticipated that residents will use these convenient chargers, and this, along with current trends, is likely to encourage EV purchases, although it is not guaranteed. Consequently, we adopted a conservative approach to estimate GHG reductions from EV chargers in residential garages, basing our assumptions on the EV purchase targets outlined in EO B-48-18.

In January 2018, EO B-48-18 was signed to “boost the supply of zero-emission vehicles and charging and refueling stations in California.” This EO sets milestones aiming for 1.5 million ZEVs on California's roads by 2025 and 5 million by 2030 (Office of Governor Edmund G. Brown Jr. 2018). These numbers are expected to be significantly higher by 2035 and beyond, due to EO N-79-20 and Advanced Clean Cars II regulations.

Based on the EMFAC2021 projections for the year 2029, California would have 29.6 million vehicles on the road; EMFAC2021 for the 2029 scenario assumes that 2.02 million of those vehicles would be electric. The 4.3 million EVs in 2029 would increase EVs to 14.53% of the market share. This would be an increase of 7.70% over CalEEMod to achieve the 14.53% total. The EMFAC output model and calculations are provided in Appendix C1.

The CalEEMod 2022.1.1.29 output file for the proposed project is provided in Appendix C1. From this project output, it was determined that mobile emissions from residential uses—which include the 6.83% EV reductions—are 1,972.9 MT CO₂e. Since the total reductions expected from this PDF would be 14.53%, a reduction of an additional 151.27 MT CO₂e would be expected or (1,973 MT CO₂e times 7.70%).

The increased EV would also require electricity to charge these EVs and requires some general assumptions related to EV efficiency. According to EV-Database.org, the average Energy Consumption for consumer EVs is 188 Wh/km (0.302 kWh/mile). Based on yearly VMT estimates in CalEEMod, the residential component of the project would generate 5,700,536 miles annually; 7.70% of these miles would be from EV, or 438,941.3 miles annually. Therefore, charging the additional EV would consume 132,560 kWh annually.

This electrical energy is not included in CalEEMod but can be calculated by taking the total estimated GHG emissions from electricity in CalEEMod (120 MT CO₂e) and dividing that number by the total proposed COCCR electrical consumption also in CalEEMod outputs (5,618,387 kWh) to establish a GHG emission rate per kWh consumed on site, which is 2.138×10^{-5} MT CO₂e per kWh. At this rate, the EV Charging from this PDF would generate about 2.83 MT CO₂e or $(132,560 \text{ kWh} \times 2.138 \times 10^{-5} \text{ MTCO}_2\text{e per kWh})$.

PDF-8: Non-Residential Electric Vehicle Charging.

GHG-emissions reductions for PDF-8 were evaluated based on the anticipated increase in EV adoption resulting from the provision of EV-capable parking spaces and the installation of EVCS.

The SSP estimates that by 2030, 3,000 EV chargers will be installed and would account for a reduction of 21,723 MTCO₂e, and by 2035 as many as 4,500 EV chargers will be installed, which would reduce GHG emissions by 47,414 MTCO₂e. Given this, each EV charger is shown to reduce GHG emissions by at least 7.24 MTCO₂e each. The project will install 44 EV chargers within the common area parking, which would account for a GHG avoidance of 318.6 MTCO₂e.

PDF-9: Tree Planting.

GHG-emissions reductions for PDF-9 are expected; however, credit was not taken into account in this analysis.

PDF-10: On-Site Solar Energy Generation.

To be conservative, GHG-emissions reductions for PDF-10 are expected, however credit was not taken into account in this analysis. Under the SSP the project would be required to install 1 kW per unit for each multi-family unit, 2 kW per unit for each single-family unit and 1.5 kW per square foot for commercial buildings. Under the SSP, 236 kW would be required for the multi-family development, 12 kW would be required for the single-family housing units and roughly 78 kW for the commercial development 51,926 SF of commercial facilities. Given this, the SSP would call for at least 326 kW in total.

3.7.5 Project Impacts and Mitigation Measures

Threshold 1: *Would implementation of the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Impact Discussion

Existing Conditions

CalEEMod 2022.1.1.29 was used for the existing operations scenario emission calculations and reflects manual input updates to reflect the estimated traffic emissions and expected daily VMT estimated by the project's traffic (Appendix O1 for the existing use). The GHG outputs are shown in Table 3.7-9. The GHG emissions estimates from CalEEMod are provided Appendix C1. Based on these findings, the existing project site land uses would generate 2,387.76 MTCO₂e annually.

Table 3.7-9. Existing Operational Greenhouse Gas Emissions (metric tons per year)

Emissions Category	Estimated Total Emissions (metric tons)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Mobile Sources	1,494.00	0.10	0.07	1,523.00
Area Sources	9.22	<0.005	<0.005	9.26
Energy Sources	550.00	0.04	<0.005	552.00
Water Use	205.00	0.14	<0.005	210.00
Waste	26.70	2.67	—	93.50
Total Project Emissions	—	—	—	2,387.76

Source: Appendix C1.

Notes: CH₄ = methane; CO₂ = carbon dioxide; CO₂e = carbon dioxide equivalent; N₂O = nitrous oxide.

Construction

Construction is expected to span approximately 5 years, beginning in 2025, ending in early 2029. Emissions generated during construction of the proposed project were estimated using a spreadsheet approach, which incorporated methodologies and data consistent with CalEEMod, version 2022.1.1.29. For mobile emissions from construction, the modeling used emission factors from EMFAC2021, version 1.0.2. The GHG emissions associated with construction of the proposed project are summarized below in Table 3.7-10. There are currently no GHG emissions threshold for construction. Although quantified emissions are not used to demonstrate compliance with an applicable standard, emissions are provided herein to provide contextual information of the project's estimated GHG emissions.

Table 3.7-10. Estimated Greenhouse Gas Emissions from Project Construction

Phase Name	Total Estimated Emissions (Metric Tons)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Total	2,608.53	0.11	0.12	2,645.70
<i>30-Year Amortization</i>	—	—	—	88.19

Source: Modeling output provided in Appendix C1.

Notes: CH₄ = methane; CO₂ = carbon dioxide; CO₂e = carbon dioxide equivalent, which includes the relative warming capacity (i.e., Global Warming Potential) of each greenhouse gas; N₂O = nitrous oxide.

As shown in Table 3.7-10, it is estimated that construction of the proposed project would generate approximately 2,645.70 MTCO₂e. The construction emissions are also amortized over 30 years, consistent with industry standards (SCAQMD 2008).⁴ The emissions generated during construction of the project would be primarily the result of diesel-powered construction equipment (e.g., excavators). Construction emissions would cease once construction of the project is complete. Therefore, these emissions are considered short term.

Operation

Operational GHG emissions associated with the proposed project are primarily due to mobile-source emissions from vehicle trips associated with implementation of the project. As discussed above, implementation of the project is estimated to generate 3,536 average daily trips (Appendix O1 and a daily VMT of 25,710. Emissions associated with such vehicle trips, and other operational sources, were calculated using CalEEMod, version 2022.1.1.29, for an operational year of 2029.⁵ Additionally, it was assumed that up to 686 people would live within the project site. This is a conservative estimate as it does not include workers and individuals who would use the golf course and restaurant. Table 3.7-11, below, summarizes the operational GHG emissions associated with the proposed project.

As shown in Table 3.7-11, the project's total annual operational GHG emissions would be 3,544.46 MTCO₂e. With the removal of the existing uses and the inclusion of the amortized construction emissions, the project's total annual operational GHG emissions would be reduced to 1,244.89 MTCO₂e. PDF-7, Residential Electric Vehicle Charging, and PDF-8, Non-Residential Electric Vehicle Charging, would then lower the total annual operational GHG emissions to 777.21 MTCO₂e. The total SP for the project site was calculated to be 686 new residents and does not include a potential increase in workers at the Resort or the future restaurant. This is conservative because the per capita threshold is based on the amount of emissions divided by the SP. In total, the project's emission would be 1.15 MTCO₂e per SP.

Table 3.7-11. Project Greenhouse Gas Emissions from Project Operation (metric tons per year)

Emissions Category	Estimated Total Emissions (metric tons)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Mobile Sources	3,209.00	0.16	0.14	3,257.00
Area Sources	9.22	<0.005	<0.005	9.26
Energy Sources	137.00	0.09	0.01	142.00
Water Use	21.50	0.35	0.01	33.20
Waste	29.40	2.94	0.0	103.00
Total Operational Emissions				3,544.46
<i>Amortized Construction Emissions</i>				<i>88.19</i>
Total Project Emissions				3,632.65
<i>Existing On-Site Emissions</i>				<i>2,387.76</i>
<i>Difference (Project minus Existing)</i>				<i>1,244.89</i>

⁴ It is likely that the development will be operational for more than 30 years, thus the 30-year amortization assumption is conservative as it increases the project's total yearly emissions.

⁵ A later project opening year would result in lower mobile-source emissions as more fuel-efficient automobiles penetrate the vehicle fleet mix.

Table 3.7-11. Project Greenhouse Gas Emissions from Project Operation (metric tons per year)

Emissions Category	Estimated Total Emissions (metric tons)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
PDF-7: Installation of 242 Garage Electric Vehicle Chargers				-151.91
PDF-7: Increased Electrical Energy from Electric Vehicle Chargers				2.83
PDF-8: Installation of 44 On-Site Electric Vehicle Chargers				-318.60
Proposed Project Emissions after Project Design Features				777.21
Service Population (242 × 2.83 people per home)				686
Project's MTCO ₂ e per Service Population				1.13
Sustainable Santee Plan Threshold				2.04
Exceed Threshold?				No

Source: Appendix C1.

Notes: CH₄ = methane; CO₂ = carbon dioxide; CO₂e = carbon dioxide equivalent; MTCO₂e = metric tons of carbon dioxide equivalent; N₂O = nitrous oxide.

Impact Determination

The City of Santee is committed to reducing its GHG emissions consistent with SB 32 and other state goals. As shown in Table 3.7-11, the project's efficiency metric would be 1.13 MTCO₂e per SP, which is below the 2.04 MTCO₂e per SP threshold of the SSP. Thus, the proposed project would not generate emissions that would either directly or indirectly have a significant impact on the environment, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would implementation of the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

Impact Discussion

AB 32, SB 32, and AB 1279 are the state's plans for reducing GHG emissions. At the local level, the City of Santee's SSP and the City of San Diego's 2022 CAP are qualified GHG reduction plans, pursuant to State CEQA Guidelines Section 15183.5. The proposed project's consistency with AB 32, SB 32, and AB 1279, including the City of Santee's SSP and the City of San Diego's 2022 CAP, has been assessed to determine the significance of this impact.

Assembly Bill 32 and Senate Bill 32

AB 32 codifies the state's GHG emissions reduction targets for 2020. CARB adopted the 2008 Scoping Plan and 2014 First Update as a framework for achieving AB 32. The 2008 Scoping Plan and 2014 First Update outlined a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions. CARB adopted

the 2017 Climate Change Scoping Plan in November 2017 as a framework for achieving the 2030 GHG emissions reduction goal described in SB 32.

The 2008 and 2014 Scoping Plans indicate that some reductions would need to come in the form of changes pertaining to vehicle emissions and mileage standards. Some would come from changes pertaining to sources of electricity and increased energy efficiency at existing facilities. The remainder would need to come from state and local plans, policies, or regulations to lower carbon emissions, relative to BAU conditions. The 2017 Scoping Plan carries forward GHG emissions reduction measures from the 2014 First Update as well as new measures to help achieve the state's 2030 target across all sectors of the California economy, including transportation, energy, and industry. Local governments will continue to play a vital role in reducing GHG emissions at the local level. As of 2019, 53% of California cities and counties had a CAP, either complete, drafted, or in progress (CARB 2019).

Applicable transportation-related GHG emissions reduction strategies and policies outlined in the 2008, 2014, and 2017 Scoping Plans include the mobile-source strategy, which encourages a reduction in VMT through implementation of SB 375 and regional SCS, as well as other VMT-reduction strategies. Energy-efficiency measures, including implementation of green building standards, the use of solar power, and the installation of electric vehicle charging stations (EVCS), are outlined in the Scoping Plans. The Scoping Plans also discuss existing and proposed water conservation measures, including installation of drought-resistant landscaping. GHG emissions reduction strategies related to trees and vegetation are also described in the Scoping Plans.

As described in Chapter 2, Project Description, the residential areas would be connected to the recreational and commercial uses at the project site by an interconnected system of golf cart paths, a multiuse path, and sidewalks that encourage pedestrian and bicycle access to these facilities. In addition, hotel guests would be able to check out communal bikes from the hotel lobby. The project would be built to exceed 2022 CALGreen Title 24, Part 11, Tier 2 voluntary measures for residential and commercial development at the site, which would incorporate energy and transportation efficiency measures, including solar power systems and EVCS.

The proposed project would reduce the amount of irrigated turf used at the golf course by 50%, from 132 to 66 acres, and increase irrigation efficiency from approximately 3.5 to 4 acre-feet per acre per year to approximately 2.5 to 3 acre-feet per acre per year. In addition, the project would include landscaping with shade trees, flowering accent trees, shrubs, and other plants that would be suitable for the local climate, along with biofiltration basins. The residential and commercial buildings would also be subject to the water-efficiency requirements of the 2022 CALGreen Title 24, Part 11, Tier 2 voluntary measures, which would reduce water usage substantially.

As shown in Table 3.7-11, the proposed project's GHG emission would be below the Sustainable Santee Plan efficiency threshold and would not generate a significant amount of GHG emissions. Furthermore, as discussed below, the project would be consistent with the City of Santee's Sustainable Santee Plan and the City of San Diego's 2022 CAP, which are based on overall SB 32 reduction targets and qualified GHG reduction plans pursuant to State CEQA Guidelines Section 15183.5. Accordingly, the project would be consistent with the SSP and the 2022 CAP, and would not hinder the state's SB 32 progress, and impacts would be less than significant.

ARB's Climate Change Scoping Plan Update 2022

The 2022 Scoping Plan includes key actions to support success in the necessary transition away from fossil fuel combustion. Among the actions listed is decarbonizing the electricity sector; which depends on both using energy more efficiently and replacing fossil-fueled generation with renewable and zero-carbon resources, including solar, wind, energy storage, 353 geothermal, biomass, and hydroelectric power. The project implements these actions by

installing EVC stations in each unit and requiring solar panels equal at least 1,168 kW of solar on site (1,089 kW on the residential units and 79 kW on the new resort).

City of Santee Sustainable Santee Plan

As discussed above, the City of Santee adopted the SSP in 2020 to reduce community and municipal GHG emissions (City of Santee 2019). The goals of the SSP are to reduce the City of Santee’s community-wide GHG emissions to 15% below 2005 emissions by 2020, 40% below 2005 emissions by 2030, and 49% below 2005 emissions by 2035. In addition to the SSP, the City of Santee adopted the SSP Checklist, which has been developed as part of the SSP implementation and monitoring process to support the achievement of individual GHG reduction measures as well as the City of Santee’s overall GHG reduction goals. The SSP Checklist provides mandatory measures that must be achieved to demonstrate consistency with the SSP. Projects that meet the requirements of the SSP Checklist will be deemed to be consistent with the SSP and found to make a less-than-significant contribution to cumulative GHG, pursuant to State CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b).

Step one in demonstrating consistency with the SSP Checklist is to demonstrate consistency with the *General Plan* land use and zoning designations at the project site. The project site is currently designated as Park/Open Space (P/OS) and Planned Development (PD) in the City of Santee’s *General Plan*. The area designated as PD is in the northern portion of the project site, bordering the existing residential land uses, which are designated Low-Medium Density Residential (R2) and Medium-High Density Residential (R14). The proposed residential development would be clustered into two areas: Residential West (i.e., multifamily detached homes), and Residential North (i.e., multifamily detached homes and lots for six single-family, single-story homes). All residential development would be accessible through privately maintained internal streets, collectively referred to as *residential development*. Residential development would be located in the designated PD areas identified in the City of Santee’s *General Plan* and consistent with the underlying zoning code (also PD). Density ranges in the PD areas would be equivalent to the City’s existing R7-R14 zones. Similarly, commercial and recreational development would be located in the designated P/OS areas identified in the City of Santee’s *General Plan* and consistent with the underlying zoning code (also P/OS). Therefore, the proposed project components within the City of Santee would be consistent with the *General Plan* land use and zoning designations at the site.

The second step of demonstrating consistency with the SSP Checklist is to demonstrate consistency with the SSP CEQA Project Consistency Checklist, which is provided in Appendix D and below in Table 3.7-12.

Table 3.7-12. Consistency of the Project with Sustainable Santee Plan Checklist Measures

Sustainable Santee Plan Goals and Implementing Measures	Project Consistency
<p>Goal 1: Increase Energy Efficiency in Existing Residential Units</p> <p>Measure 1.2. For existing Residential Unit Permit for Major Modifications (more than 30 percent of dwelling unit size, including bathroom and kitchen) that is considered a project under CEQA must implement energy efficiency retrofits recommended from City Energy Audit and explain the energy efficiency retrofits implemented.</p>	<p>Not applicable. Future development implemented under the proposed project would not include modifications to existing residential units.</p>

Table 3.7-12. Consistency of the Project with Sustainable Santee Plan Checklist Measures

Sustainable Santee Plan Goals and Implementing Measures	Project Consistency
<p>Goal 2: Increase Energy Efficiency in New Residential Units</p> <p>Measure 2.1. New residential construction meet or exceed California Green Building Standards Tier 2 Voluntary Measures, such as obtaining green building ratings including LEED, Build it Green, or ENERGY STAR Certified building certifications in scoring development and explain the measures implemented.</p>	<p>Applicable. The proposed project would be consistent with the 2022 CALGreen Tier 2 residential voluntary measures. The proposed project would demonstrate compliance with the Tier 2 voluntary measures using the Section A4.602 Residential Occupancies Application Checklist. The proposed project would be consistent with the Tier 2 EV charging requirement in Section A4.106.8 and the Tier 2 energy efficiency requirements in Sections A4.203.1, A4.203.1.1, Table A4.203.1.1, A4.203.1.2 and A4.203.1.3. Consistent with the Tier 2 energy efficiency requirements in Section A4.203.1.2, the proposed project would include heat-pump water-heater demand management, as well as heat-pump space and water heating. The proposed project would therefore be consistent with Goal 2.</p>
<p>Goal 3: Increase Energy Efficiency in Existing Commercial Units</p> <p>Measure 3.2. For existing commercial units of 10,000 square feet or more seeking building permits for modifications representing 30 percent or more square feet and considered a project under CEQA must implement energy efficiency retrofits recommended by the City to meet California Green Building Standards Tier 1 Voluntary Measures and explain the retrofits implemented.</p>	<p>Not applicable. Future development implemented under the proposed project would not include modifications to existing commercial units.</p>
<p>Goal 4: Increase Energy Efficiency in New Commercial Units</p> <p>Measure 4.1. New commercial units meet or exceed California Green Building Standards Tier 2 Voluntary Measures such as obtain green building ratings including: LEED, Build it Green, or ENERGY STAR Certified buildings certifications in scoring development and explain the measures implemented.</p>	<p>Applicable. The proposed project would be consistent with the 2022 CALGreen Tier 2 nonresidential voluntary measures. The proposed project would demonstrate compliance with the Tier 2 voluntary measures using the Section A5.602.2 CALGreen verification guidelines. The proposed project would implement the following Tier 2 voluntary nonresidential requirements: Section A5.203.1 (Energy Efficiency) and Section A5.211.1 (Onsite Renewable Energy). Consistently with Section A5.203.1 requirements, the proposed project would include outdoor lighting and service-water heating in restaurants. The proposed project would therefore be consistent with Goal 4.</p>
<p>Goal 5: Decrease Energy Demand through Reducing Urban Heat Island Effect</p> <p>Measure 5.1. Project utilizes tree planting for shade and energy efficiency such as tree planting in parking lots and streetscapes.</p> <p>Measure 5.2. Project uses light-reflecting surfaces such as enhanced cool roofs on commercial buildings.</p>	<p>Applicable. Consistent with Measure 5.1, the proposed project would plant trees throughout the project site. The project will plant approximately 645 new trees within the development or 414 new trees in the residential development, 60 new trees on the golf course, and 171 new trees at the hotel site and access road. Consistent with Measure 5.2, the proposed project would use integrated solar-</p>

Table 3.7-12. Consistency of the Project with Sustainable Santee Plan Checklist Measures

Sustainable Santee Plan Goals and Implementing Measures	Project Consistency
	photovoltaic and solar-thermal panels on the roofs of commercial buildings. The proposed project would therefore be consistent with Goal 5.
<p>Goal 6: Decrease Greenhouse Gas emissions through Reducing Vehicle Miles Traveled</p> <p>Measure 6.1. Proposed project streets include sidewalks, crosswalks, and other infrastructure that promotes non-motorized transportation options.</p> <p>Measure 6.2. Proposed project installs bike paths to improve bike transit.</p>	<p>Applicable. The proposed project's residential areas would be connected to recreational and commercial uses at Carlton Oaks Country Club and Golf Course by an interconnected system of golf cart paths, a multiuse path, and sidewalks that would encourage pedestrian and bicycle access to the facilities. In addition, hotel guests would be able to check out communal bikes from the hotel lobby. The proposed project would therefore be consistent with Goal 6.</p>
<p>Goal 7: Increase Use of Electric Vehicles</p> <p>Measure 7.1. Install electric vehicle chargers in all new residential and commercial developments,</p> <ol style="list-style-type: none"> For new Single-Family Residential, install complete 40 amp electrical service and one e-charger. For new Multifamily Residential, install e-chargers for 13 percent of total parking. For new Office Space, Regional Shopping Centers, and Movie Theaters, install e-chargers for 5 percent of total parking spaces. For new Industrial and other Land Uses employing 200 or more employees, install e-chargers for 5 percent of total parking spaces. 	<p>Applicable. The project will install 242 Level 2 Electric Vehicle Supply Equipment (EVSE) and 44 EVSE will be installed in common area parking locations.</p> <p>Consistent with Measure 7.1(a), the proposed project would provide 40-amp electrical service and one EVCS at each residential unit, consistent with the requirements of 2022 CALGreen Section A4.106.8.1. As detailed in Appendix D, Measure 7.1(b), the project will be consistent by installing EVCS at each multifamily residential unit. Measure 7.1(c) would not be applicable because the proposed project would not include the listed land uses. However, consistent with Measure 7.1(d), more than 5% of the nonresidential parking spaces would have an EVCS. Section A5.106.5.3.2 of the 2022 CALGreen Tier 2 voluntary measures requires 45% of the nonresidential parking spaces to be capable of supporting the installation of EVCS and 33% of the EV-capable parking spaces to have EVCS installed. Thus, the proposed project would be consistent with the Tier 2 voluntary measures, as required by Goal 4. The proposed project would therefore be consistent with Goal 7.</p>
<p>Goal 8: Improve Traffic Flow</p> <p>Measure 8.1. Implement traffic flow improvement program.</p> <ol style="list-style-type: none"> Install smart traffic signals at intersections warranting a traffic signal, or Install roundabout. 	<p>Applicable. The proposed project would install an internal roundabout within the residential development south of the resort entrance. The proposed project would construct new internal private roadways; however, these roadways would be intended for project access and would not be intended to serve traffic flow on external public streets. New or replacement traffic signals are not proposed. The proposed project would therefore be consistent with Goal 8.</p>
<p>Goal 9: Decrease Greenhouse Gas Emissions through Reducing Solid Waste Generation</p> <p>Measure 9.1. Reduce waste at landfills.</p>	<p>Applicable. The proposed project would be consistent with Section 4.408.1 of CALGreen (2022), which requires a minimum of 65% of the nonhazardous</p>

Table 3.7-12. Consistency of the Project with Sustainable Santee Plan Checklist Measures

Sustainable Santee Plan Goals and Implementing Measures	Project Consistency
	construction and demolition waste to be recycled and/or salvaged in accordance with either Section 4.408.2, 4.408.3, or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance. The proposed project would therefore be consistent with Goal 9.
<p>Goal 10: Decrease Greenhouse Gas Emissions through Increasing Clean Energy Use</p> <p>Measure 10.1. Increase distributed energy generation within city of Santee by implementing the following applicable photovoltaic solar systems,</p> <ol style="list-style-type: none"> Single-family residential to install at least 2 kW per unit of PV solar systems, unless the installation is infeasible due to poor solar resources established in a solar feasibility study prepared by a qualified solar consultant submitted with an application. Multifamily residential to install at least 1 kW per unit of PV solar systems, unless the installation is infeasible due to poor solar resources established in a solar feasibility study prepared by a qualified solar consultant submitted with an applicant's formal project submittal to City of Santee. On commercial buildings, install at least 2 kW per square foot of building area (e.g., 2,000 square feet = 3 kW) unless the installation is infeasible due to poor solar resources. 	<p>Applicable. The project would install at least 1,168 kW of solar on site (1,089 kW on the residential units and 79 kW on the new resort).</p> <p>It should be noted that under the SSP the Project would be required to install 1 kW per unit for each multifamily unit, 2 kW per unit for each single-family unit and 1.5 W per square foot for commercial buildings. Under the SSP, 236 kW would be required for the multifamily development, 12 kW would be required for the single-family housing units and roughly 78 kW for the commercial development 51,926 SF of commercial facilities. Given this, the SSP would call for at least 326 kW in total.</p> <p>Consistent with Measure 10.1(a), the proposed project would be consistent with City of Santee CAP requirements (i.e., single-family residential units to install photovoltaic solar systems providing at least 2 kilowatts per unit [1,089 kW in total]). As detailed in Appendix D, Measure 10.1(b) Residential units to install a total of 1,089 kW. Measure 10.1 (c), requires commercial buildings to provide at least 79 kilowatts of photovoltaic solar power.</p>

Source: City of Santee 2019.

As shown in Table 3.7-12 and related discussions, the proposed project would be consistent with all applicable goals in the SSP Checklist. Two of the goals are not applicable to the project; therefore, consistency with these goals does not apply. Because the project would be consistent with all applicable goals of the SSP Checklist, it would not conflict with the City of Santee's SSP and would allow the City of Santee to meet its state-aligned GHG emission targets.

Furthermore, the proposed project was found to emit 777.21 MTCO_{2e} per year after implementation of the PDFs. This works out to roughly 1.13 MTCO_{2e} per SP for the project, which would be considerably less than the 2.04 MTCO_{2e} per SP threshold necessary for the City of Santee to maintain its state-aligned 2035 emission target, as well as future targets. Therefore, the project would not conflict with the City of Santee's plans, policies, or regulations adopted for the purpose of reducing GHGs.

City of San Diego 2022 Climate Action Plan

The City of San Diego adopted the City of San Diego 2022 CAP in September 2022. The 2022 CAP establishes baseline GHG emissions for 2019, sets goals for GHG reductions of 4.2 MMTCO₂e by 2030 and net-zero emissions by 2035, and details the implementation actions and phasing for achieving the goals. Because the 2022 CAP is a qualified GHG reduction plan pursuant to State CEQA Guidelines Section 15183.5, projects that meet the requirements of the 2022 CAP will be deemed to be consistent with the CAP and found to make a less-than-significant contribution to cumulative GHG, pursuant to State CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b). To demonstrate such consistency, projects must meet the requirements of the 2022 CAP Consistency Regulations, defined in San Diego Municipal Code Chapter 14, Article 3, Division 14. In addition, pursuant to the City of San Diego CEQA significance determination thresholds of the *Land Use Manual*, projects must also be consistent with the existing *General Plan* and community plan land use and zoning designations to determine whether a project's incremental contribution to a cumulative GHG emissions effect may be determined to be not cumulatively considerable.

In the City of San Diego General Plan, the southern part of the project site is designated as Open Space. The surrounding land uses are primarily residential, municipal, commercial, and recreational uses. Surrounding land use designations consist primarily of R2, R14, PD, P/OS, Public, Neighborhood Commercial (NC), Medium-Density Residential (R7), High-Density Residential (R22), and General Commercial (GC). Proposed project components within the City of San Diego would not change the existing land use at the project site because the portion of the project site within City of San Diego jurisdiction currently exists as a golf course and will remain a golf course following implementation of the proposed project. According to the City of San Diego's Community Plan, the proposed project is designated as Open Space (City of San Diego 2021). Thus, because the proposed project would not change the existing land use at the project site, and the existing uses identify as Open Space, the proposed project would be consistent with the community plan land use designation. In addition, the City of San Diego zoning designation at the project site is RS-1-8 (City of San Diego 2013), defined as Planned Urbanized Communities or Proposition A Lands that require, at a minimum, 40,000-square-foot lots (City of San Diego 2022c). Thus, because the project site within City of San Diego jurisdiction exceeds 40,000 square feet and exists as a single lot, the proposed project would be consistent with the zoning designation. Therefore, the proposed project would be consistent with the existing *General Plan* and community plan land use and zoning designations, as required by the City of San Diego CEQA significance determination thresholds of the *Land Use Manual*.

The proposed project must demonstrate consistency with the City of San Diego 2022 CAP Consistency Regulations, defined in San Diego Municipal Code Chapter 14, Article 3, Division 14. As shown in Section 143.1403, Application of the Climate Action Plan Consistency Regulations, the CAP Consistency Regulations apply to the following:

1. Development that results in three or more total dwelling units on all premises in the development
2. Nonresidential development that adds more than 1,000 square feet and results in 5,000 square feet or more of total gross floor area, excluding unoccupied spaces such as mechanical equipment and storage areas
3. Parking facilities as a primary use

Because project components within the City of San Diego would not result in three or more dwelling units on all premises in the development; would not include nonresidential development that would add more than 1,000 square feet and result in 5,000 square feet or more of total gross floor area, excluding unoccupied spaces such as mechanical equipment and storage areas; and would not include parking facilities as a primary use, the CAP

Consistency Regulations do not apply to project components within the City of San Diego. As stated previously, the proposed project would not change the existing land use at the project site within the City of San Diego because the portion of the project site within City of San Diego jurisdiction currently exists as a golf course and will remain as golf course following implementation of the proposed project. Therefore, the project components within the City of San Diego would be consistent with the City of San Diego's 2022 CAP and have a less-than-significant GHG impact.

Impact Determination

The proposed project would be consistent with the City of Santee's SSP and the City of San Diego's 2022 CAP. As shown in Table 3.7-12, the project would meet all requirements on the City of Santee's SSP Checklist. The project would also meet the City of San Diego's CEQA significance determination thresholds of the *Land Development Manual*, and the City of San Diego's 2022 CAP Consistency Regulations. Furthermore, the proposed project would emit 777.21 MTCO₂e per year after implementation of the PDFs, which works out to roughly 1.13 MTCO₂e per SP for the project, which would be considerably less than the 2.04 MTCO₂e per SP threshold necessary for the City of Santee to achieve its 2035 state-aligned emission target and future emission targets. Therefore, the project would not conflict with the City of Santee's plans, policies, or regulations adopted for the purpose of reducing GHGs.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.7.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would implementation of the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The geographic scope for consideration of GHG emissions is on a global scale because such emissions contribute, on a cumulative basis, to global climate change. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires lead agencies to evaluate the cumulative impacts of GHGs, even relatively small additions, on a global basis. By nature, GHG evaluations are a cumulative study. As described in Section 3.7.5, Project Impacts and Mitigation Measures, implementation of the proposed project would not result in potentially significant GHG emissions because it would be below the SSP efficiency threshold for 2035 and result in a less-than-significant impact. Thus, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and the proposed project would not result in a cumulatively considerable impact. Impacts would be less than significant.

Cumulative Threshold 2: Would implementation of the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The plans and policies applicable to the proposed project and cumulative projects for reducing GHG emissions include the City of Santee's SSP and the City of San Diego's 2022 CAP. The SSP and 2022 CAP consider local projects that may contribute to GHG emissions impacts and establish targets for meeting statewide emissions-

reduction targets under SB 32. The SSP and 2022 CAP are designed to cumulatively consider GHG emissions in the City of Santee and the City of San Diego, respectively, and ensure that each respective city is consistent with statewide emission reduction targets. As such, the analysis in Section 3.7.5 considers the potential cumulative impacts of the proposed project by evaluating its consistency with the City of Santee's SSP and the City of San Diego's 2022 CAP.

As described therein, the proposed project would not result in a cumulatively considerable impact related to consistency with the City of Santee's SSP and the City of San Diego's 2022 CAP, because the project would implement all applicable GHG reduction strategies required by the SSP and would be consistent with San Diego Municipal Code Chapter 14, Article 3, Division 14. Thus, implementation of the proposed project would not result in a cumulatively considerable impact. Impacts would be less than significant, and no mitigation would be required.

3.7.7 Summary of Significant Impacts

The project would not result in any significant GHG impacts.

3.7.8 References

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3.8 Hazards and Hazardous Materials

3.8.1 Overview

This section describes the existing conditions and applicable laws and regulations for hazards and hazardous materials, followed by an analysis of the proposed Carlton Oaks Country Club and Resort Project (project).

The analysis and conclusions regarding air pollutants are discussed in Section 3.2, Air Quality and Health Risk, and water pollutants are discussed in Section 3.9, Hydrology and Water Quality, and not in this section. The analysis and conclusions regarding exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, are discussed in Section 3.18, Wildfire. Information in this section is summarized from the following reports:

- *Phase I Environmental Site Assessment, Carlton Oaks Country Club, Santee, California, July 30, 2018*, prepared by Geocon Incorporated (Geocon) (Appendix H1)
- *Phase II Environmental Site Assessment, Carlton Oaks Country Club, Santee, California, July 18, 2018*, prepared by Geocon (Appendix H2)

3.8.2 Environmental Setting

Until the 1950s, the project site was undeveloped vegetated land, with the San Diego River meandering through the center of the site in an east-west orientation. During the late 1950s, a golf course and country club were developed. The golf course was generally flat, with two constructed water features present along the northeastern portion of the golf course, consistent with the current location of the northernmost water feature on the golf course. Buildings consistent with the existing club house, hotel, and maintenance building were present on site since the early 1960s, and the villas along Carlton Oaks Boulevard were constructed throughout the 1960s and early 1970s. The southern water feature was developed in the 1980s. In approximately 1995, the golf course was redeveloped to the layout that currently exists on the project site. The project site currently consists of a 145-acre, 18-hole golf course and country club structures, including a 52-room motel-type hotel. Structures within the country club facility include administrative offices, a pro shop, a restaurant and bar, a swimming pool, a golf cart barn, maintenance facilities, and an asphalt-paved parking lot.

The land surrounding the project site was either graded or left as undeveloped land until the early 1960s, when residential development was constructed adjacent to the northeastern boundary of the project site and southeast of the project site. The existing residential neighborhoods north of the central and western portions of the project site were constructed in the 1970s. In the mid-to-late 1990s, Interstate (I) 52, located south of the project site, was developed into what it resembles today.

3.8.2.1 Hazardous Materials

Geocon prepared the *Phase I Environmental Site Assessment, Carlton Oaks Country Club, Santee, California* (Appendix H1) for the project site. Based on the site reconnaissance Geocon performed for the Phase I Environmental Site Assessment (ESA), a 1,000-gallon aboveground storage tank, located south of the maintenance shed, is used for gasoline and diesel fuel storage. No spills or leaks were observed. Other hazardous chemicals are also stored on site, including swimming pool chemicals in the pool-equipment enclosure and lawn fertilizers and

pesticides in the maintenance building. The maintenance shed, located in the southeastern portion of the project site, contained soil surfactant, herbicides, fertilizers, fungicides, and a small amount of paints, oils, and other maintenance chemicals. No spills or unsafe conditions were identified during the site reconnaissance, nor did Geocon identify any environmental concerns associated with these site conditions.

Geocon also prepared the Phase II ESA (Appendix H2). Because the project site has been operating as a golf course since the 1950s, the Phase II ESA was intended to investigate the potential presence of organochlorine pesticides (OCPs) and arsenic, both commonly used pesticides that may have been applied to the project site. The Phase II ESA consisted of collecting and analyzing 108 soil samples in the portion of the project site within the City of Santee. OCPs were not detected in any of composite soil samples at concentrations exceeding applicable residential screening levels, and arsenic concentrations detected in the soil samples were within the range of naturally occurring background levels. The Phase II ESA concluded that future workers and residents of the project site would not be exposed to OCPs nor arsenic concentrations that would be harmful to human health, and no further investigation was warranted.

Hazardous Materials Database Results

Geocon retained Environmental Data Resources LLC (EDR), to perform a standard environmental record search for the Phase I ESA. EDR searched federal, state, and local databases. On August 29, 2019, the applicant conducted a review of applicable regulatory agency hazardous materials databases for sites, properties, or facilities currently under investigation for potential environmental violations, and sites storing or using hazardous materials. The databases searched include the sources that comprise what is known as the *Cortese List*. A description of database listings found on the project site and within 0.25 miles of the project site are discussed below.

On Site

The EDR records search identified several listings for the project site that are associated with an unauthorized release from a gasoline underground storage tank in 1992:

- Leaking Underground Storage Tanks (LUST)
- San Diego County Site Assessment and Mitigation Program (SAMP)
- Statewide Environmental Evaluation and Planning System (SWEEPS) – Underground Storage Tanks (UST)
- San Diego County Local Oversight Program (LOP)
- Facility Index System (FINDS)
- Recovered Government Archive (RGA) LUST
- Historical Cortese

In 1992, a LUST case on the project site was opened with San Diego County Department of Health (DEH) case number DEH H20821-001 (Appendix H1, Phase I Environmental Site Assessment). An unauthorized release of gasoline to the soil occurred because of a leak in a UST system located adjacently west of the maintenance building, in the center of the eastern portion of the golf course. Contaminated soil was excavated, and 50 cubic yards of stockpiled soil was disposed of on site. The stockpiled soil did not contain detectable contamination levels of total petroleum hydrocarbon. The remaining soils had levels of contaminants below the established cleanup level of 100 parts per milligram (ppm). One groundwater sample was taken, the results of which were “non-detect” for gasoline contaminants. DEH determined no further action was required, and the case was closed in November 1993. The closure letter states: “Additionally, be advised that changes in the present or proposed use of the site may require

further site characterization and mitigation activities. It is the property owner's responsibility to notify this agency of any changes in report content, future contamination findings, or site usage" (Appendix H1, Phase I Environmental Site Assessment). Regulatory closure was granted contingent on continued use of the project site as a golf course, which constitutes an administrative control, and the Client does not plan to redevelop the portion of the site that contained the leaking UST. Therefore, Geocon determined that case H20821-001 was not a potential environmental concern for the project site.

The same 1,000-gallon UST site was also listed on the San Diego County Hazardous Materials Division (HMD) and Historical UST Registered Database (HIST UST) databases. According to records, the UST was removed from the site in April 1992. The permit number continued to be updated after the UST removal to track the storage and use of fertilizers, diesel fuel, gasoline, oils, solvents, and other potential contaminants on the site. The listing indicates the permit status as "open," but also states that the permit expired in August 2013. Violations were listed related to this permit; however, they were administrative in nature and unrelated to the release of hazardous materials. The Phase I ESA did not identify any potential environmental concerns related to these listings.

Three HAZNET listings are noted for the project site by the Phase I ESA associated with "other organic solids" in 1998 and 1999, and halogenated solvents, covering 2009 through 2011. No releases or violations were noted associated with these listings. The Phase I ESA did not consider this listing as a potential environmental concern.

Off Site

EDR searched the applicable regulatory agency databases for listed properties in the vicinity of the project site. Listed properties within 0.125 miles (or 0.25 miles for LUST cases) of the project site are summarized in Table 3.8-1. Geocon did not identify any of these listed sites as potential environmental concerns for the project site (Appendix H1, Phase I Environmental Site Assessment).

Table 3.8-1. Off-Site Environmental Database Listings

Name and Location	Distance from Project Site	Database Listing	Phase I ESA Determination
Padre Dam Municipal Water District (PDMWD) 9120 Carlton Oaks Drive, City of Santee	203 feet east-northeast	LUST, CPS-SLIC, CHMIRS, Historical Cortese, SWEEPS UST, Historical UST, San Diego Co. SAM, San Diego Co. HMMD, San Diego Co. LOP, UST	The Phase I ESA indicated the closed regulatory status of the LUST case and nature of the SLIC and CHMIRS cases with lack of groundwater impacts indicate that this facility is unlikely to have caused a Recognized Environmental Concern (REC) at the project site.
Texaco/Equilon Enterprises, LLC 8111 Mission Gorge Road, City of Santee	496 feet west-southwest	LUST, San Diego Co. SAM, CPS-SLIC, San Diego Co. HMMD, SWEEPS UST, Historical UST, Historical Cortese, EDR Historic Auto	The Phase I ESA indicated the closed regulatory statuses of the LUST cases, downgradient location and the distance from the Site indicate that this facility is unlikely to have caused an REC at the project site.
Bill C. Buckel/John & Zona Ainsworth 9025	600 feet east-southeast	EDR Hist Auto, San Diego Co. HMMD, SWEEPS UST	The distance from the project site and lack of inclusion on

Table 3.8-1. Off-Site Environmental Database Listings

Name and Location	Distance from Project Site	Database Listing	Phase I ESA Determination
City of Santee			any release-related databases indicate that this facility is unlikely to have caused an REC at the project site.
Qwik Mart/Rons Self Serve/Pacific Diamond/COD Gas & Oil 9035 Mission Gorge Road, City of Santee	901 feet east-southeast	LUST, San Diego Co. SAM, CPS-SLIC, San Diego CO. HMMD, HIST Cortese, San Diego Co. LOP, Hist UST, SWEEPS UST, UST	The regulatory statuses of the LUST cases and distance from the project site indicate that this facility is unlikely to have caused an REC at the project site.
7-Eleven Food Store #19006 9111 Mission Gorge Road, City of Santee	1065 feet east-southeast	LUST, San Diego Co. HMMD, UST, Historical UST, EMI, Historical Cortese, Notify 65, San Diego Co. LOP, CIWQS, SWEEPS UST, HAZNET	The regulatory status of the LUST case and distance from the project site indicate that this facility is unlikely to have caused an REC at the project site.

3.8.2.2 Proximity to Schools

There are eight public schools within 2 miles of the project site. One public school is within 0.25 miles of the project site; Carlton Oaks Elementary School (9353 Wethersfield Road) is approximately 0.15 miles to the north. Other nearby schools include Chet F Harritt Elementary School (8120 Arlette Street), approximately 0.28 miles to the south, Carlton Hills Elementary School (9353 Pike Road), approximately 0.42 miles to the northeast, and West Hills High School (8756 Mast Boulevard), approximately 0.41 miles to the north. For more information regarding public schools, see Section 3.14, Public Services.

3.8.2.3 Proximity to Airports and Airstrips

Gillespie Field (1960 Joe Crosson Drive, City of El Cajon) is approximately 1.45 miles southeast of the project site. Gillespie Field is owned and operated by the County of San Diego. The project site is not located within the noise contours or safety zones for Gillespie Field; however, the project site is located within the Airport Influence Area (AIA) Review Area 2 for Gillespie Field, established by the San Diego County Regional Airport Authority (2023). Airport Land Use Commission (ALUC) review is required for land use plans and regulations within Airport Influence Review Area 2 proposing increases in height limits and for land use projects that: (1) have received from the Federal Aviation Administration (FAA) a Notice of Presumed Hazard, a Determination of Hazard, or a Determination of No Hazard subject to conditions, limitations, or marking and lighting requirements; and/or (2) would create any of the following hazards (San Diego County Regional Airport Authority 2014):

- Bird attractants
- Dust, water vapor, and smoke
- Electromagnetic interference
- Glare

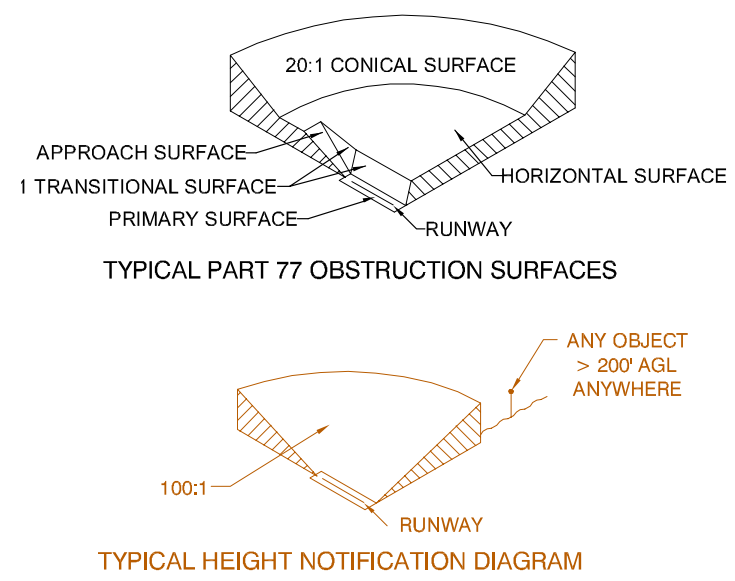
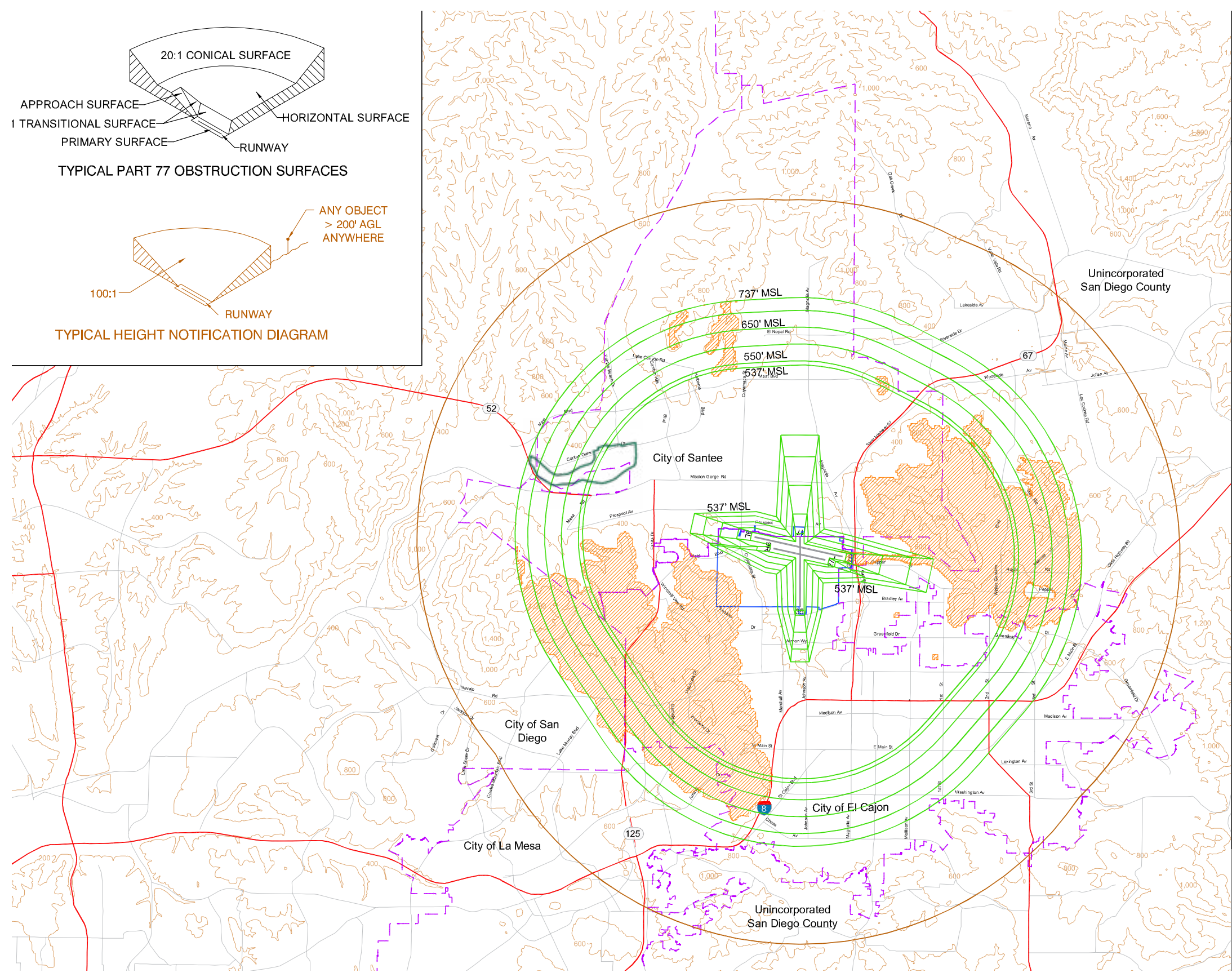
- Lighting
- Thermal plumes

The project site does fall within the Airspace Protection Area for Gillespie Field, which is the area beneath the imaginary surfaces surrounding the airport, as defined by the criteria set forth in Part 77 and the U.S. Standard for Terminal Instrument Procedures to establish the maximum safe height that objects on the ground can reach without potentially creating constraints or hazards to the use of airspace by aircraft (see Figure 3.8-1, Gillespie Field Compatibility Policy Map: Part 77 Airspace Protection). The project site lies within the Overflight Notification Area surrounding Gillespie Field (Figure 3.8-2, Gillespie Field Avigation Easement and Overflight Notification Areas), but it is not within an area requiring an avigation easement. The Overflight Notification Area is a buyer awareness tool used to inform prospective buyers of the airport's potential impact on a property. An overflight notification is recorded on the property's chain of title and indicates the property might be subject to noise, vibrations, overflights, or odors due to its proximity to an airport, but does not limit height (ALUC 2010). As shown in Figure 3.8-3, Gillespie Field Compatibility Policy Map: Airport Influence Area, the project site is also within Review Area 2 of the AIA. Review Area 2 only requires ALUC review for certain land use actions, such as constructing an object that will constitute a hazard or obstruction to air navigation; has a height greater than 35 feet above ground level; could create electrical, lighting, or glare hazards to pilots; or has the potential to attract birds.

The project site is approximately 6.15 miles southeast of the Marine Corps Air Station (MCAS) Miramar. The project site is not located within the Compatibility Policy Maps for Noise, Safety, or Airspace Protection. However, a small area in the northeastern portion of the project site is within AIA Review Area 2 and the Overflight Notification Area for MCAS Miramar (San Diego County Regional Airport Authority 2023) (Figure 3.8-4, MCAS Miramar Compatibility Policy Map: Airport Influence Area).

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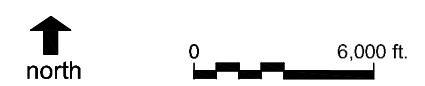


LEGEND

- Roads
- Highways
- Municipal Boundary
- Airport Boundary
- Topographic Contours (200-foot interval)
- Terrain Penetrations to Airspace Surfaces

Airspace Protection Surfaces

- FAA Height Notification Boundary
- Part 77 Airspace Surfaces
- Project Boundary



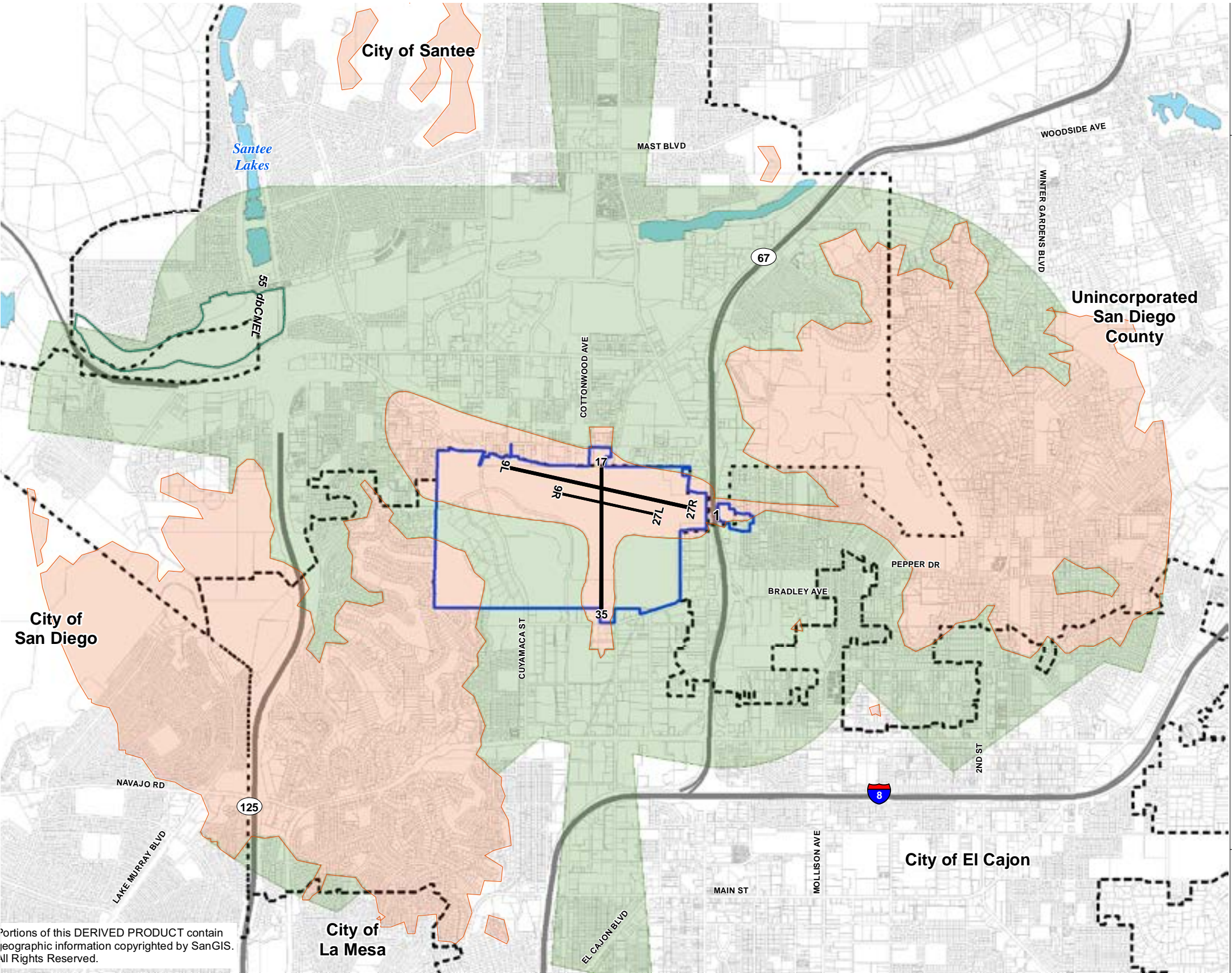
- Notes:
1. Part 77 = Federal Aviation Regulations (Title 14 Code of Federal Regulations) Part 77.
 2. Airport elevation is 387 feet above mean sea level (MSL).
 3. FAA Height Notification Boundary: The boundary extends 20,000 feet from the nearest point of any runway. Within the boundary, Part 77, Subpart B requires that the FAA 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. Outside the boundary, the FAA must be notified of any proposed construction or alteration having a height greater than 200 feet above ground level (AGL).
 4. Part 77 surfaces are drawn based on approach types listed in the Runway End Data table.

Sources: Roads - San Diego Association of Governments (SANDAG), 2006; Topographic Contours - SANDAG, 2006; Part 77 Surfaces - Ricondo & Associates, Inc. 2009; Federal Aviation Regulations (Title 14 Code of Federal Regulations) Part 77, Objects Affecting Navigable Airspace.

Prepared by: Ricondo & Associates, Inc., October 2009.

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AIRPORT LAND USE COMMISSION
SAN DIEGO COUNTY

LEGEND

- Airport Property Boundary
- - - Municipal Boundary
- Highways
- Water
- Avigation Easement Areas
- Airport Overflight Notification Area
(only applies to new residential development)
- Project Boundary



0 3,000 ft.

Note: As a condition of the approval of applicable development projects, property owners shall dedicate an avigation easement to the airport operator, see Policy 2.11.5. Applicable projects include: (1) all projects within the runway protection zone, Safety Zone 1; (2) conditional uses within the 65 dB CNEL contour and higher; (3) uses proposed on sites where the ground penetrates a Part 77 airspace surface; and (4) projects where proposed structures, trees, or other objects would be obstructions, according to the FAA. Areas where the first two conditions would apply are shown in this exhibit. Areas where the third condition would apply will vary depending on the specific project proposal and the findings of the FAA's Form 7460-1 aeronautical study process.

Sources: Parcels - San Diego Geographic Information Source (SanGIS), 2008; Roads and Highways - SANDAG, 2008.

Prepared by: Ricondo & Associates, Inc., January 2010.

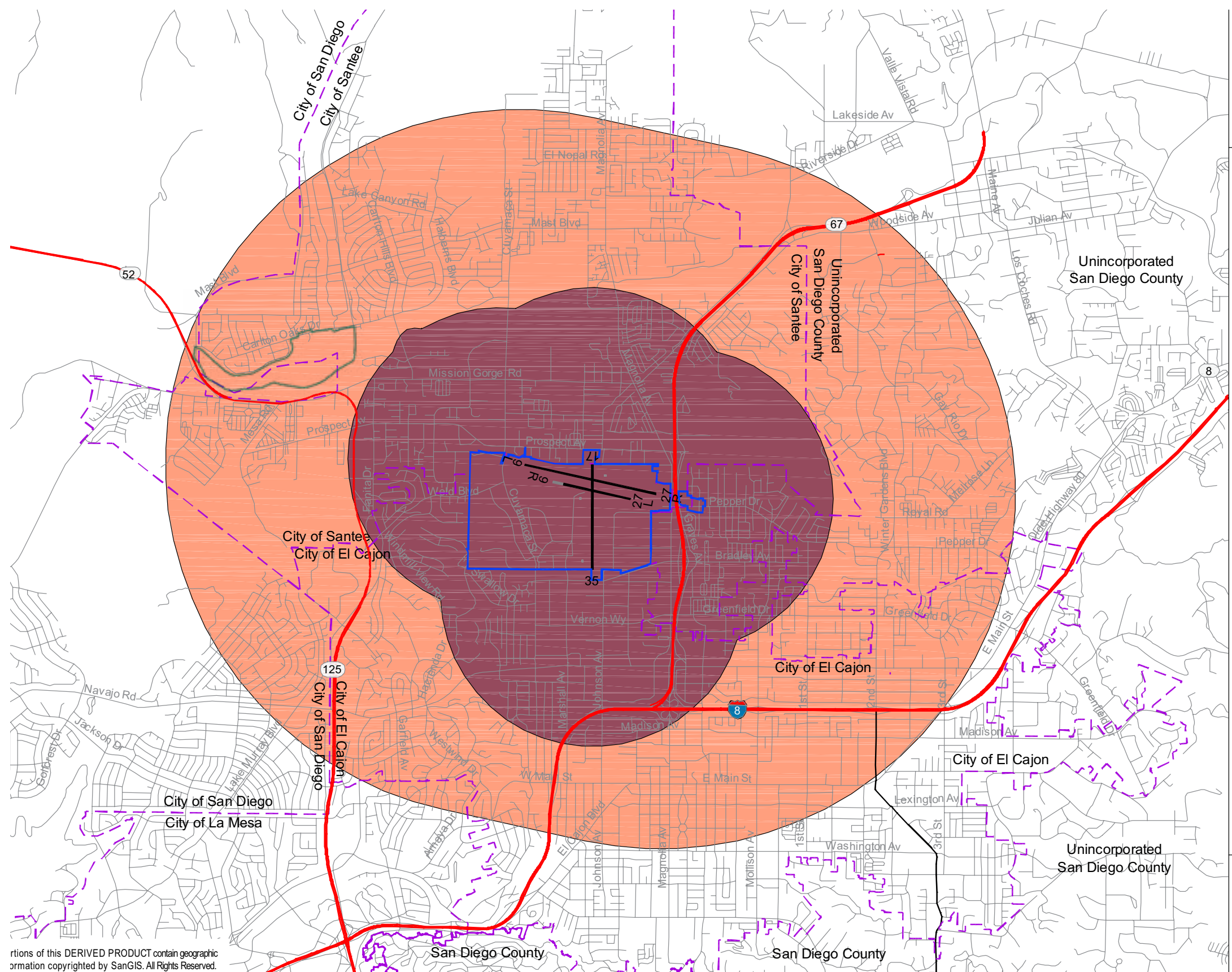
Source: Gillespie Field Airport Land Use Compatibility Plan 1/2010

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Figure 3.8-2
Gillespie Field Avigation Easement and Overflight Notification Areas

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AIRPORT LAND USE COMMISSION
SAN DIEGO COUNTY

LEGEND

- Airport Property Boundary
- Roads
- Highways
- Municipal Boundary
- Future Runway 9R/27L extension
- Airport Influence Area
 - Review Area 1
 - Review Area 2
 - Project Boundary



0 4,000 ft.

Note: Real estate disclosure required in the entire Airport Influence Area (see Policy 3.6.2)

Sources: Roads - San Diego Association of Governments (SANDAG), 2006; Airport Influence Area - Mead & Hunt, Inc., 2008.

Prepared by: Ricondo & Associates, Inc., October 2009.

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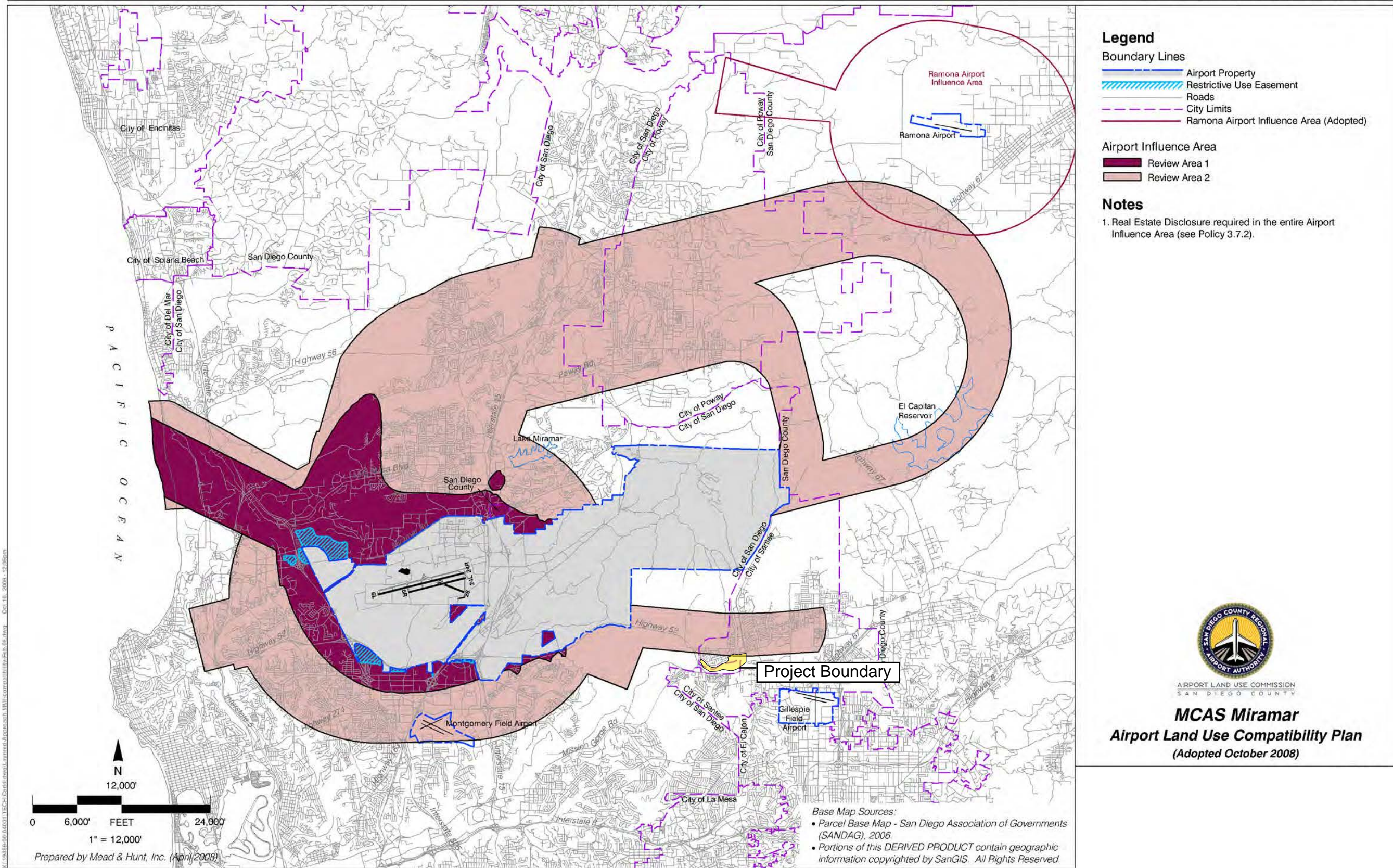
Source: Gillespie Field Airport Land Use Compatibility Plan 1/2010

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Figure 3.8-3
Gillespie Field Compatibility Policy Map: Airport Influence Area

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Source: MCAS Miramar Airport Land Use Compatibility Plan, 10/2008.

Figure 3.8-4
MCAS Miramar Compatibility Policy Map: Airport Influence Area

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3.8.3 Applicable Laws and Regulations

3.8.3.1 Federal

Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program, which is administered by the U.S. Environmental Protection Agency (USEPA), to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. Under RCRA regulations, hazardous waste must be tracked from the time of generation to the point of disposal. The RCRA program also establishes standards for hazardous waste treatment, storage, and disposal units, which are intended to have hazardous waste managed in a manner that minimizes present and future threats to the environment and human health. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed of at a facility, any treatment, storage, or disposal unit must be permitted under the RCRA. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the “cradle to grave” system of regulating hazardous materials.

Department of Transportation Hazardous Materials Regulations (49 CFR 100–185)

U.S. Department of Transportation (DOT) Hazardous Materials Regulations (CFR Title 49, Parts 100–185) cover all aspects of hazardous materials packaging, handling, and transportation. Parts 107 (Hazard Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response), 173 (Packaging Requirements), 177 (Highway Transportation), 178 (Packaging Specifications), and 180 (Packaging Maintenance) would all apply to goods movement to and from the proposed project and/or surrounding uses.

Enforcement of these aforementioned DOT regulations is shared by each of the following administrations under delegations from the Secretary of the DOT:

- **Research and Special Programs Administration** is responsible for container manufacturers, reconditioners, and re-testers and shares authority over shippers of hazardous materials.
- **Federal Highway Administration** enforces all regulations pertaining to motor carriers.
- **Federal Railroad Administration** enforces all regulations pertaining to rail carriers.
- **FAA** enforces all regulations pertaining to air carriers.
- **U.S. Coast Guard (USCG)** enforces all regulations pertaining to shipments by water.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted in 1980 to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established prohibitions and 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. The corresponding regulation in 42 CFR 103 provides the general framework for response actions and managing hazardous waste.

Emergency Planning and Community Right-To-Know Act (42 USC 11001 et seq.)

The Emergency Planning and Community Right-to-Know Act was enacted by Congress as the national legislation on community safety in 1986, as Title III of the Superfund Amendments and Reauthorization Act. This law was designated to help local communities protect public health, safety, and the environment from chemical hazards. To implement this act, Congress required each state to appoint a State Emergency Response Commission. The State Emergency Response Commissions are required to divide their states into Emergency Planning Districts and to name a Local Emergency Planning Committee for each district. The act provides requirements for emergency release notification, chemical inventory reporting, and toxic release inventories for facilities that handle chemicals.

Federal Aviation Administration Height Notification Boundary

The *Gillespie Field Land Use Compatibility Plan* (ALUC 2010) identifies the FAA Height Notification Boundary and Federal Aviation Regulation (FAR) Part 77, which establishes requirements for notifying the FAA of certain construction activities and alterations to existing structures to ensure that there are no obstructions to navigable airspace. The boundary extends 20,000 feet from the runway. Within the boundary, FAR Part 77 requires that the FAA be notified of any proposed construction or alteration having a height greater than an imaginary surface extending 100 feet outward and 1 foot upward (i.e., slope of 100:1) from the runway. Outside the boundary, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA.

Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act establishes the framework for safe and healthful working conditions for workers by authorizing enforcement of the standards developed under the act. The act also provides for training, outreach, education, and assistance related to establishing a safe working environment. Regulations defining safe standards have been developed for general industry, construction, maritime, recordkeeping, and agriculture. A major component of the act is the requirement that employers implement the Occupational Safety and Health Act Hazard Communication Standard to provide information to employees about the existence and potential risks of exposures to hazardous substances in the workplace. As part of the Hazard Communication Standard, employers must do the following:

- Obtain material safety data sheets from chemical manufacturers that identify the types and handling requirements of hazardous materials used in given areas;
- Make the material safety data sheets available to their employees;
- Label chemical containers in the workplace;
- Develop and maintain a written hazard communication program; and
- Develop and implement programs to train employees about hazardous materials.

Occupational Safety and Health Administration (OSHA) standards specific to hazardous materials are listed in 29 CFR 1910 Subpart H. Safety and health regulations pertaining to construction are listed in 29 CFR 1926 Subpart H.

3.8.3.2 State

Cortese List

California Government Code 65962.5 (commonly referred to as the *Cortese List*) includes hazardous waste facilities and sites listed by the Department of Toxic Substances Control (DTSC), Department of Health Services lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board (SWRCB) as having underground storage tank leaks or a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites with a known migration of hazardous waste/material.

California Health and Safety Code (Hazardous Waste Control Act)

DTSC, a department of the California Environmental Protection Agency (Cal/EPA), is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Division 20, Chapter 6.5, of the California Health and Safety Code identifies hazardous waste control regulations pertaining to transportation, treatment, recycling, disposal, enforcement, and the permitting of hazardous waste. Division 20, Chapter 6.10, identifies regulations applicable to the cleanup of hazardous materials releases. Title 22, Division 4.5, contains environmental health standards for the management of hazardous waste, as well as standards for the identification of hazardous waste (Chapter 11), and standards that are applicable to transporters of hazardous waste (Chapter 13).

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (California Health and Safety Code, Chapter 6.11 Sections 25404–25404.9)

This program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of the environmental and emergency response programs and provides authority to the Certified Unified Program Agency (CUPA). The CUPA for San Diego County is the San Diego County Department of Environmental Health's HMD, which has the responsibility and authority for implementing and enforcing the requirements listed in Chapter 6.5 (commencing with Section 25100), Chapter 6.67 (commencing with Section 25270), Chapter 6.7 (commencing with Section 25280), Chapter 6.95 (commencing with Section 25500), and Sections 25404.1 and 25404.2, including the following:

- **Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control, and Countermeasure (SPCC) Plans.** Facilities with a single tank or cumulative aboveground storage capacities of 1,320 gallons or greater of petroleum-based liquid product (e.g., gasoline, diesel, lubricants) must develop an SPCC plan. An SPCC plan must be prepared in accordance with the oil pollution prevention guidelines in 40 CFR 112. This plan must describe the procedures, methods, and equipment needed at the facility to prevent discharges of petroleum from reaching navigable waters. A registered professional engineer must certify the SPCC plan, and a complete copy of the plan must be maintained on site.
- **California Accidental Release Prevention Program.** This program requires any business that handles more than threshold quantities of an extremely hazardous substance to develop a Risk Management Plan. The Risk Management Plan is implemented by the business to prevent or mitigate releases of regulated substances that could have off-site consequences through hazard identification, planning, source reduction, maintenance, training, and engineering controls.

- **Hazardous Materials Business Plan/Hazardous Materials Inventory Statements.** Hazardous Materials Business Plans contain basic information regarding the location, type, quantity, and health risks of hazardous materials and/or waste. Each business must prepare a Hazardous Material Business Plan if that business uses, handles, or stores a hazardous material and/or waste or an extremely hazardous material in quantities greater than or equal to the following:
 - 55 gallons for a liquid
 - 500 pounds for a solid
 - 200 cubic feet for any compressed gas
 - Threshold planning quantities of an extremely hazardous substance
- **Hazardous Waste Generator Program.** This program regulates businesses that generate any amount of a hazardous waste. Proper handling, recycling, treating, storing, and disposing of hazardous waste are key elements to this program.
- **Tiered Permitting Program.** This program regulates the onsite treatment of hazardous waste.
- **Underground Storage Tank Program.** This program regulates the construction, operation, repair, and removal of underground storage tanks that store hazardous materials and/or waste.

Hazardous Waste Control Act (Health and Safety Code Section 25100 et seq.)

DTSC is responsible for the enforcement of the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which creates the framework under which hazardous wastes are managed in California. The Hazardous Waste Control Act requires a hazardous waste generator that stores or accumulates hazardous waste for periods greater than 90 days at an on-site facility or for periods greater than 144 hours at an off-site or transfer facility, which treats or transports hazardous waste, to obtain a permit to conduct such activities. The law provides for the development of a state hazardous waste program that administers and implements the provisions of the federal RCRA for a cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous waste and development of standards that are equal to or, in some cases, more stringent than federal requirements, such as mandating source reduction planning and regulating the number of types of waste and waste management activities that are not covered by federal law with the RCRA.

Environmental Health Standards for the Management of Hazardous Waste

These standards (CCR, Title 22 [CA Title 22], Division 4.5 Section 66001 et seq.) establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the state Hazardous Waste Control Act and federal RCRA.

California Code of Regulations, Title 8 – Industrial Relations

Title 8 of the California Code of Regulations, Section 1532.1 is a rule developed by the federal OSHA in 1993 and adopted by the State of California. This rule is comparable to the federal standards described above. Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The federal OSHA and the California Division of Occupational Safety and Health (Cal/OSHA) are responsible for ensuring worker safety in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. These standards would be applicable to both construction and operation of the proposed project. Title 8 includes regulations pertaining to

hazard control (including administrative and engineering controls), hazardous chemical labeling and training requirements, hazardous exposure prevention, hazardous material management, and hazardous waste operations.

Title 8 also specifies requirements for the removal and disposal of asbestos-containing materials (ACMs). In addition to providing information regarding how to remove ACMs, specific regulations limit the time of exposure, regulate access to work areas, require demarcation of work areas, prohibit certain activities in the presence of ACM removal activities, require the use of respirators, require monitoring of work conditions, require appropriate ventilation, and require qualified persons for ACM removal.

Title 8 also covers the removal of lead-based paint (LBP). Specific regulations cover the demolition of structures that contain LBP, the process associated with its removal or encapsulation, remediation of lead contamination, the transportation/disposal/storage/containment of lead or materials containing lead, and maintenance operations associated with construction activities involving lead, such as LBP. Similar to ACM removal, LBP removal requires proper ventilation, respiratory protection, and qualified personnel.

California Labor Code (Division 5, Parts 1 and 7)

California Labor Code regulations ensure appropriate training regarding the use and handling of hazardous materials and the operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who handle hazardous materials are appropriately trained and informed about the materials. Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

State Water Resources Control Board Construction General Permit (2009-0009-DWQ)

Construction activities that disturb 1 acre or more of land must obtain coverage under the SWRCB Construction General Permit (Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ, and Order 2012-006-DWQ). Under the terms of the permit, applicants must file a complete and accurate Notice of Intent and Permit Registration Documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction best management practices (BMPs) and prepare a construction Storm Water Pollution Prevention Plan containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site.

3.8.3.3 Regional

Gillespie Field Airport Land Use Compatibility Plan

Public Utilities Code Section 21675 requires each airport land use commission to formulate an Airport Land Use Compatibility Plan (ALUCP). The basic function of ALUCPs is to promote compatibility between airports and the land uses that surround them “to the extent that these areas are not already devoted to incompatible uses” (Public Utilities Code Section 21674[a]). With limited exception, California law requires preparation of ALUCPs for each public use and military airport in the state. California Government Code Section 65302.3 further requires that general plans and any applicable specific plan be consistent with ALUCPs. In addition, General Plans and applicable Specific Plans must be amended to reflect amendments to the ALUCP. Most counties have established an ALUC, as provided for by law, to prepare ALUCPs for the airports in that county and review land use plans, development proposals, and certain airport development plans for consistency with the compatibility plans. In the County of San

Diego, the ALUC function rests with the Board of the San Diego County Regional Airport Authority, in accordance with California Public Utilities Code Section 21670.3.

In accordance with California Public Utilities Code Section 21675, the Gillespie Field ALUCP was published in January 2010 and approved in December 2010 (ALUC 2010). The Gillespie Field ALUCP is intended to (1) provide for the orderly growth of the Gillespie Field Airport and the area surrounding the airport, and (2) safeguard the general welfare of the inhabitants within the vicinity of the airport.

Marine Corps Air Station Miramar Airport Land Use Compatibility Plan

The MCAS Miramar ALUCP was approved by the Board of the San Diego County Regional Airport Authority in October 2008. The Miramar ALUCP promotes compatibility between MCAS Miramar and the surrounding land uses by regulating future development of new residential dwellings, commercial and industrial structures, and other noise- or risk-sensitive land uses within the AIA.

San Diego County Code, Title 6, Division 8

San Diego County Code of Regulatory Ordinances under Title 6, Division 8, Chapters 8 through 11 establish the HMD as the local CUPA. The HMD is responsible for the protection of public health, safety, and the environment and inspects businesses or facilities that handle or store hazardous materials, generate hazardous waste, generate medical waste, and own or operate USTs. HMD also administers the California Accidental Release Prevention Program and the Aboveground Petroleum Storage Act Program, and provides specialized instruction to small businesses through its Pollution Prevention Specialist. HMD has the authority under state law to inspect facilities with hazardous materials or hazardous waste and, in cases where a facility is in non-compliance with the applicable state law or regulations, take enforcement action.

Projects are required to notify HMD regarding the use, handling, release (spills), storage, and/or disposal of hazardous materials and hazardous waste in accordance with existing state law and County ordinance. The notification is the initial step in the HMD permitting process, which requires businesses that handle or store hazardous materials, are part of the California Accidental Release Prevention Program, generate or treat hazardous wastes, generate or treat medical waste, store at least 1,320 gallons of aboveground petroleum, or own and/or operate USTs to obtain and maintain a Unified Program Facility Permit. The online notification must be done using the State of California Environmental Reporting System by the applicant/permittee requesting a permit and submitted within 30 days.

If a building permit is required, Section 65850.2 of the California Government Code prohibits building departments from issuing a final Certificate of Occupancy unless a business or facility that handles hazardous materials has submitted and met the requirements of a Hazardous Materials Business Plan. The Hazardous Materials Business Plan contains detailed information on the storage of hazardous materials at regulated facilities and serves to prevent or minimize damage to public health, safety, and the environment from a release or threatened release of a hazardous material. The Hazardous Materials Business Plan also provides emergency response personnel with adequate information to help them better prepare and respond to chemical-related incidents at regulated facilities.

Operational Area Emergency Plan

The San Diego County Operational Area was formed to help the County of San Diego and its cities develop emergency plans, implement such plans, develop mutual aid capabilities between jurisdictions, and improve

communications between jurisdictions and agencies. The San Diego County Operational Area consists of the County and all jurisdictions within the County. The Operational Area Emergency Plan is for use by the County and all of the cities within the County to respond to major emergencies and disasters. It defines roles and responsibilities of all County departments and many city departments.

Cities within San Diego County are encouraged to adopt the Operational Area Emergency Plan, with modifications that would be applicable to each city. The plan is updated once every 4 years by the Office of Emergency Services and the Unified Disaster Council of the Unified San Diego County Emergency Services Organization.

3.8.3.4 Local

General Plan

The City of Santee's *General Plan – Land Use Element* and *Safety Element* contain policies related to hazards and hazardous materials that apply to the proposed project (City of Santee 2003a, 2003b).

Land Use Element

The City of Santee's *General Plan – Land Use Element* (City of Santee 2003a) guides the ultimate pattern of development in the City of Santee. It specifies the location, type, and amount of housing, commercial services, industrial uses, parks, public facilities, and open space that will compose the City of Santee at buildout. The policies in this element pertinent to the proposed project is listed below:

Policy 6.2. The City should promote the use of innovative site planning to avoid on-site hazards and minimize risk levels.

Safety Element

The City of Santee's *General Plan – Safety Element* (City of Santee 2003b) intends 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. It identifies areas where private and public decisions on land use need to be responsive to potentially hazardous conditions. It also serves to inform individuals, firms, and public agencies of Santee's policies regarding appropriate levels of public services, such as sheriff's and fire protection. Policies of this element pertinent to the proposed project are listed below:

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 1.7. Critical Emergency uses (hospitals, fire stations, police stations, the Emergency Operations Center, public administration buildings and schools) shall not be located in flood hazard areas or in areas that would affect their ability to function in the event of a disaster.

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.

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.

Policy 3.1. The City shall continue to implement the County's Hazardous Waste Management Plan.

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 3.7. Encourage safe and proper disposal of household hazardous waste.

Policy 3.8. Promote safe, environmentally sound means of solid waste disposal for the community.

Policy 3.9. Investigate ways to encourage businesses to recycle their waste.

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 4.7. The City shall ensure that the distribution of fire hydrants and capacity of water lines is adequate through periodic review.

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 4.11. 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 6.2. The City shall promote the utilization of traffic control devices such as signals, medians and other street design measures along busy roadways to regulate, warn, and guide traffic, thereby diminishing traffic 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.

City of Santee Municipal Code

The City of Santee Municipal Code, Title 5, Chapter 5.16, Section 5.16.010 Deposit of Hazardous Materials – Cleanup or Abatement – Liability for Costs, establishes the City’s authority to recover costs of clean up or abatement activities related to hazardous materials from the person or persons who caused such a deposit or own the property on which the hazardous material is discovered.

City of San Diego

General Plan

Multiple elements of City of San Diego’s General Plan (City of San Diego 2008) address hazards and hazardous materials. The General Plan provides policies for protecting communities from unreasonable risk of hazards, and the Public Facilities, Services, and Safety Element (City of San Diego 2022) includes policies related to hazardous materials, disaster preparedness, and maintenance of emergency and evacuation plans. Policies relevant to the project are listed below:

PF-D.12. Protect communities from unreasonable risk of wildfire within very high fire hazard severity zones.

PF-D.13. Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.

PF-D.15. Maintain access for fire apparatus vehicles along public streets in very high fire hazard severity zones for emergency equipment and evacuation.

PF-D.21. Identify existing areas that have inadequate access for fire apparatus vehicles and evacuation routes.

PF-D.23. Review development applications for compliance with all applicable state and local requirements for fire safety including but not limited to fire apparatus road access, water supply, defensible space, and brush management.

PF-I.2. Maximize waste reduction and diversion (see also Conservation Element, Policy CE.A.9).

PF-I.3. Provide environmentally sound waste disposal facilities and alternatives.

PF I.5. Plan for sufficient waste handling and disposal capacity to meet existing and future needs. Evaluate existing waste disposal facilities for potential expansion of sites for new disposal facilities.

PF-P.11. Ensure that disaster recovery efforts involving the disposal of materials adhere to the policies in Section I of this element.

PF-P.12. Develop, implement, and sustain a robust disaster preparedness community outreach and education program.

PF-Q.1. Protect public health and safety through the application of effective seismic, geologic and structural considerations.

PF-Q.2. Maintain or improve integrity of structures to protect community members and preserve communities.

Solid Waste Local Enforcement Agency

The City of San Diego's Solid Waste Local Enforcement Agency is responsible for enforcing federal and state laws and regulations for the safe and proper handling of solid waste. State law (i.e., PRC) requires that every local jurisdiction designate a solid waste Local Enforcement Agency that is certified by the Department of Resources Recycling and Recovery to enforce federal and state laws and regulations for the safe and proper handling of solid waste.

Any development plan proposing to handle, process, transport, store, or dispose of solid wastes including household trash and garbage, construction debris, commercial refuse, sludge, ash, discarded appliances and vehicles, manure, landscape clippings, and other discarded wastes shall contact the Local Enforcement Agency for determination of the need for a solid waste facility permit.

RWQCB Municipal Permit (Order No. R9-2013-0001)

The Municipal Stormwater Permit (Order No. R9-2013-0001 as amended by Order Nos. R9-2015-001 and R9-2015-0100) is a National Pollutant Discharge Elimination System (NPDES) permit that requires the owners and operators of Municipal Separate Storm Sewer Systems (MS4s) within the San Diego region to implement management programs to limit discharges of pollutants and non-stormwater discharges to and from their MS4 from all phases of development. The Municipal Stormwater Permit requires "copermittees" to develop watershed-based Water Quality Improvement Plans. The Municipal Stormwater Permit emphasizes watershed program planning and program outcomes. The intent of the permit is to enable each jurisdiction to focus its resources and efforts to do the following:

- Reduce pollutants in stormwater discharges from its MS4
- Effectively prohibit non-stormwater discharges to its MS4
- Achieve the interim and final [Water Quality Improvement Plan] numeric goals

The proposed project would be required to comply with the NPDES permit requirements.

3.8.4 Project Impact Analysis

3.8.4.1 Methodology

The following impact analysis evaluates the effects from hazards and hazardous materials that may result with the implementation of the proposed project. The methodology used to evaluate potential impacts relative to hazards

and hazardous materials are based on the existing conditions on the project site and on surrounding properties as described above. The impact analysis assesses the potential of the proposed project to exacerbate existing hazards or hazardous materials, or introduce new hazards or hazardous materials, in such a way that would trigger a threshold listed below.

3.8.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the CEQA Guidelines and provide the basis for determining significance of impacts associated with hazards and hazardous materials resulting from the implementation of the proposed project. Impacts are considered significant if the proposed project would result in any of the following:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. 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.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport, public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. See discussion and analysis in Section 3.18, Wildfire.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, including in areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. See discussion and analysis in Section 3.18, Wildfire.

3.8.5 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the proposed project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact Discussion

Construction

Proposed project construction would involve the routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, and grease. Such transport, use, and disposal must be compliant with applicable regulations such as the RCRA, DOT Hazardous Materials Regulations, and the local CUPA regulations (as well as other regulations described under Section 3.8.3, Applicable Laws and Regulations).

Construction activities would include the use of machinery and other equipment that may require fueling or maintenance/servicing with other petroleum-based products (e.g., grease, oil). These materials are considered hazardous and could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination may occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. All construction activities would be subject to the Statewide NPDES Construction General Permit (CGP), which regulates stormwater discharges from construction sites that result in soil disturbance of 1 acre or more of total land area and/or are smaller sites that are part of a larger plan of development. The CGP requires preparation of a construction Stormwater Pollution Prevention Plan, which would identify the BMPs that would be in place prior to the start of construction activities and during construction, including materials-management BMPs.

During construction of the proposed project, paints, solvents, and other materials (e.g., wood and cement sealers) may also be used. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the USEPA, DTSC, and the City of Santee and City of San Diego Fire Departments. Because of the limited quantities of these materials that would be used by the proposed project, the materials are not considered hazardous to the public at large. The transport, use, and storage of hazardous materials during construction would be conducted pursuant to all applicable local, state, and federal laws, including the RCRA, CERCLA, SARA, Hazardous Materials Transportation Act, and CCRs Title 22 and Title 27. Compliance with all applicable local, state, and federal laws related to the transportation, use, and storage of hazardous materials would reduce the likelihood and severity of accidents during transit, use, and storage.

In addition, the construction phase of the proposed project does not meet the criteria that require preparation of an SPCC plan. In order for the proposed project to trigger the preparation of an SPCC plan, it would need to meet all three criteria identified in Section 3.8.3, Applicable Laws and Regulations. The construction phase of the proposed project meets two of the three criteria: construction would involve storing, using, transferring, or otherwise handling oil, and it is located adjacent to the San Diego River; however, the portion of the San Diego River east of I-5 is not considered navigable. Further, the construction phase of the proposed project would not result in an aggregate aboveground storage capacity greater than 1,320 gallons or an underground storage capacity greater than 42,000 gallons. Therefore, an SPCC plan is not required. Impacts would be less than significant.

Operation

The proposed project involves the redevelopment of the golf course, development of two residential neighborhoods, Residential West and Residential North, and the resort facility. The operation of the resort facility is anticipated to use hazardous materials typically used in commercial and hotel establishments, and golf course operations. These hazardous materials typically include cleaning agents, paints, pesticides, fuels, propane, oil, batteries, and pool chemicals. These hazardous material products are generally used in small, localized amounts, and any spills that may occur are required to be cleaned up as soon as they occur. The transport, use, and disposal of hazardous material products must be compliant with applicable regulations, such as the RCRA, DOT Hazardous Materials Regulations, and the local CUPA regulations (as well as other regulations described under Section 3.8.3, Applicable Laws and Regulations). Operations of the golf course resort would continue similarly to the existing golf course facility. Therefore, project operations would result in a less-than-significant impact on the public or the environment through the routine transport, use, storage, or disposal of hazardous materials.

Impact Determination

City of Santee

Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

City of San Diego

Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

Mitigation Measures

City of Santee

No mitigation is required.

City of San Diego

No mitigation is required.

Level of Significance After Mitigation

City of Santee

Impacts would be less than significant.

City of San Diego

Impacts would be less than significant.

Threshold 2: Would implementation of the proposed 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?

Impact Discussion

Construction

Construction of the proposed project would involve demolition of existing structures at the Carlton Oaks Country Club, and construction of a new country club and resort and residential development. Grading would require 258,244 cubic yards of raw cut and 512,445 cubic yards of raw fill, with a net import of approximately 279,020 cubic yards of imported material to balance the site. Construction waste generated from demolition and excavation would be transported from the site and disposed of at the closest approved landfill. Ground disturbing construction activities such as excavation or grading have the potential to disrupt buried hazardous materials that may have impacted soil or groundwater due to a past unauthorized release, spill, or other accidental condition. As described in Section 3.8.2.1, Hazardous Materials, a LUST case was opened for the project site related to an unauthorized release of gasoline from a UST that was identified during closure and removal of the UST. The UST was located west

of the maintenance building, located in the center of the eastern portion of the golf course. The site was excavated in 1992 and was granted closure in November 1993. No further action was required by the County of San Diego HMMMD, dependent on the continued use of the site as a golf course. The location of this former UST excavation area is south of the proposed resort facility. Should soil disturbance become necessary in this location, there could be impacts related to the release of hazardous soil into the environment, and the contaminated soil would need to be handled in a safe manner. However, the current project design shows that the proposed project does not plan to redevelop this area; as such, the previous County of San Diego stipulation that the site of DEH case H20821-001 remain under golf course uses would still apply. Impacts would be less than significant.

Due to the historic use of the project site as a golf course from the late 1950s, the Phase II ESA was prepared to determine the presence and extent of OCPs and arsenic, typically used in pesticides to maintain the golf course landscaping. The results of the Phase II ESA indicated OCPs were not detected on the site at concentrations exceeding applicable residential screening levels, and arsenic was not detected at levels above the background ranges typically found in California soils. Therefore, ground disturbing activities would not encounter or disturb excessive concentrations of OCPs or arsenic and would not create a hazard to the public or the environment. The impact would be less than significant.

Based on the age of the buildings and structures present on the project site, there is a high likelihood that LBP and/or ACM are present on site. Specifically, the Carlton Oaks Lodge and hotel, villas, and maintenance building have been present on the project site prior to 1980. Any demolition or grading activities would be required to comply with Title 8, Industrial Relations, of the CCR, which provides specific guidance on removal and disposal of ACM and LBP. As such, compliance with these regulations would ensure that removal of any ACM and/or LBP would be conducted in a safe manner, including proper disposal in an approved facility. Therefore, impacts associated with the removal and disposal of ACM and LBP would be less than significant.

Operation

Operation of the proposed project would result in the use of small amounts of typical hazardous materials often used for the operation and maintenance of the golf course, hotel, and residences. These hazardous material products are generally used in small amounts, and any releases that occur would be limited in scope and spill area and would be cleaned up soon after they occur, as required by regulations, including the RCRA, NPDES permit, and CUPA requirements. Proposed golf course operations would be similar to existing golf course operations and would comply with the applicable laws and requirements for the handling and proper storage of materials used for operation and maintenance, such as pesticides, fertilizers, cleaning products, chlorine and other pool chemicals, batteries, oil, or lubricants. Therefore, operation of the proposed project would result in less-than-significant impact related to hazards to the public or to the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

Impact Determination

City of Santee

As discussed above, should soil disturbance become necessary in the location of the LUST closure (DEH case H20821-001), there could be impacts related to the release of hazardous soil into the environment and the contaminated soil would need to be handled in a safe manner. However, pursuant to Appendix H1, Phase I Environmental Site Assessment, the preparers of the Phase I ESA have provided documentation that the current project design would avoid this area. As such, the preparers of the Phase I ESA have stated that because the area

is not changing use, there is no need to enroll in the Voluntary Assistance Program. As discussed above, compliance with regulations regarding ACMs and/or LBP would ensure that removal would be conducted in a safe manner, including proper disposal in an approved facility. Impacts would be less than significant.

City of San Diego

As discussed above, should soil disturbance become necessary in the location of the LUST closure (DEH case H20821-001), there could be impacts related to the release of hazardous soil into the environment and the contaminated soil would need to be handled in a safe manner. However, pursuant to Appendix H1, Phase I Environmental Site Assessment, the preparers of the Phase I ESA have provided documentation that the current project design would avoid this area. As such, the preparers of the Phase I ESA have stated that because the area is not changing use, there is no need to enroll in the Voluntary Assistance Program. As discussed above, compliance with regulations regarding ACMs and/or LBP would ensure that removal would be conducted in a safe manner, including proper disposal in an approved facility. Impacts would be less than significant.

Mitigation Measures

City of Santee

No mitigation is required.

City of San Diego

No mitigation is required.

Level of Significance After Mitigation

City of Santee

Impacts would be less than significant.

City of San Diego

Impacts would be less than significant.

Threshold 3: Would implementation of the proposed project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Discussion

The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25 miles of a school. As discussed in Section 3.8.2.2, Proximity to Schools, one school, Carlton Oaks Elementary School, is located within 0.25 miles of the project site. Construction of the golf course, residential development, country club and resort would require the use of typical construction-related hazardous materials, such as fuel, oil, lubricants, solvent, paint, and grease. Any hazardous materials used during project construction would be used temporarily and would be transported, used, and stored in accordance with state and federal regulations regarding hazardous materials.

Operation of the proposed project would be consistent with the typical operation of a golf course, hotel, and residential uses, which do not result in emissions of hazardous materials or the use of large quantities of hazardous or acutely hazardous materials. The types of hazardous materials that could be used during operation include pesticides, fertilizers, oils, fuels, pool chemicals and typical cleaners. These hazardous material products are generally used in small, localized amounts, and any spills that may occur are required to be cleaned up as soon as they occur. Therefore, the proposed project would not emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of a school, and the impact would be less than significant.

Impact Determination

City of Santee

Implementation of the proposed project would not emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of a school. Impacts would be less than significant.

City of San Diego

Implementation of the proposed project would not emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of a school. Impacts would be less than significant.

Mitigation Measures

City of Santee

No mitigation is required.

City of San Diego

No mitigation is required.

Level of Significance After Mitigation

City of Santee

Impacts would be less than significant.

City of San Diego

Impacts would be less than significant.

Threshold 4: Would the proposed 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, create a significant hazard to the public or the environment?

Impact Discussion

As discussed in Section 3.8.2.1, Hazardous Materials, the project site is listed on several environmental databases pursuant to Government Code Section 65962.5 (or the Cortese List), as well as other relevant environmental

databases reviewed as part of the Phase I ESA prepared for the proposed project. The listing for LUST case DEH H20821-001, associated with an unauthorized release of gasoline to the soil during removal of a former UST, is located in the eastern portion of the project site in the vicinity of the proposed hotel. As discussed in Threshold 2, the site was excavated and closed, and the DEH issued a closure letter contingent on the continued use of the site as a golf course. The location of this former UST excavation area is south of the proposed resort facility. However, the current project design shows that the proposed project does not plan to redevelop this area; as such, the previous County of San Diego stipulation that the site of DEH case H20821-001 remain under golf course uses would still apply.

Should soil disturbance become necessary in this location, there could be impacts related to the release of hazardous soil into the environment. However, in accordance with the local, state, and federal regulations for hazardous waste discussed in Threshold 2, contaminated soil and groundwater generated at the project site must be identified, characterized (i.e., as RCRA hazardous, California hazardous, or nonhazardous), and disposed of accordingly. As appropriate, based on the results of waste characterization, excavated soil would be disposed of at an appropriate disposal facility. Similarly, if contaminated groundwater were encountered and must be removed in order for project development to continue, then it would be extracted, containerized, characterized, and disposed of according to the characterization results. Therefore, impacts would be less than significant.

Impact Determination

City of Santee

Implementation of the proposed project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment if the soil in this area is disturbed. However, pursuant to Appendix H1, Phase I Environmental Site Assessment, the current project design would avoid this area. Impacts would be less than significant.

City of San Diego

Implementation of the proposed project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment if the soil in this area is disturbed. However, pursuant to Appendix H1, Phase I Environmental Site Assessment, the current project design would avoid this area. Impacts would be less than significant.

Mitigation Measures

City of Santee

No mitigation is required.

City of San Diego

No mitigation is required.

Level of Significance After Mitigation

City of Santee

Impacts would be less than significant.

City of San Diego

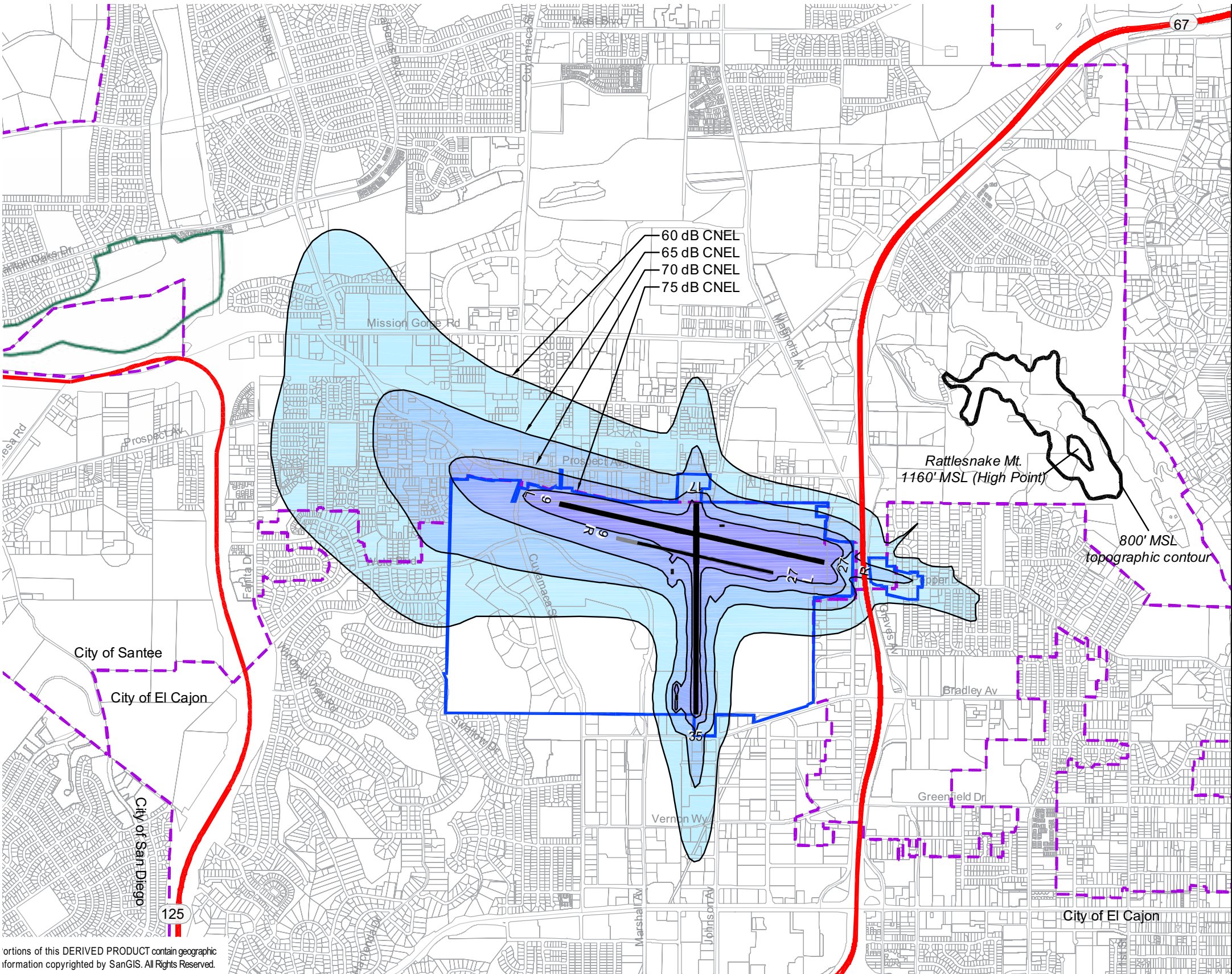
Impacts would be less than significant.

Threshold 5: Would the proposed project be located within an airport land use plan or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and, as a result, exacerbate an existing safety hazard or excessive noise for people residing or working within the vicinity of the project area?

Impact Discussion

As described in Section 3.8.2.3, Proximity to Airports and Airstrips, the project site is within 1.45 miles of Gillespie Field and is within the boundaries of the AIA Review Area 2 and the Overflight Notification Area as determined by the ALUC. A portion of the project site in the northeastern area is within the AIA Review Area 2, and Overflight Notification Area for MCAS Miramar. The highest building proposed as part of the project would be the hotel building, which would be two stories and approximately 38 feet high. Construction activities may require a crane that could be up to 60 feet tall. Additionally, the project would require the installation of four new utility poles, which would be up to approximately 45 feet to 55 feet in height. The project does not fulfil any of the triggers (200 feet or within the imaginary glide path) for an aeronautical study, or otherwise need an approval from the FAA pursuant to FAA Part 77. However, because the project site is located within the AIA for two airports, and the proposed project would include construction cranes, installation of new utility poles, and the operation of a two-story building, the project proponent was required to obtain FAA approvals (attached as Appendices Ia and Ib). Appendix Ia indicates that the aeronautical study revealed that the structures do not exceed obstruction standards and would not be a hazard to air navigation provided the following condition is met: It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or within 5 days after the construction reaches its greatest height (7460, Part 2). The proposed project will also need ALUC review and determination for any construction equipment and operational structures proposed to be over 35 feet in height. As shown on Figure 3.8-5, Gillespie Field Compatibility Policy Map: Noise, which illustrates the ALUCP's Compatibility Policy Map: Noise, the project site does not fall within the noise exposure area for Gillespie Field. As such, the project would not result in or exacerbate excessive noise related to a public airport. Additionally, a small area in the northeastern portion of the project site is within the AIA Review Area 2, and Overflight Notification Area for MCAS Miramar (San Diego County Regional Airport Authority 2023) (Figure 3.8-4). With compliance with regulatory requirements, impacts related to safety hazards for people residing or working within the vicinity of the project site would be less than significant.

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AIRPORT LAND USE COMMISSION
SAN DIEGO COUNTY

LEGEND

- Airport Property Boundary
- Parcel Line
- Highways
- Municipal Boundary
- Future Runway 9R/27L extension

Noise Exposure Range

- 60 - 65 dB CNEL
- 65 - 70 dB CNEL
- 70 - 75 dB CNEL
- 75 + dB CNEL
- Project Boundary

Existing and Future Average
Annual Day (776 and 973
operations respectively)



north

0 2,000 ft.

- Notes:
1. See Table III-1 for criteria applicable within each noise exposure range.
 2. Airport elevation is 387 feet above mean sea level (MSL).
 3. The depicted contours are a combination of existing and future contours and represent the highest noise level of either scenario.
 4. CNEL = Community Noise Equivalent Level.
 5. MSL = Mean Sea Level.

Sources: Parcels - San Diego Geographic Information System (SanGIS), 2008;
Noise Contours - Harris, Miller, Miller & Hanson, April 2007.

Prepared by: Ricondo & Associates, Inc., October 2009.

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Impact Determination

City of Santee

Implementation of the proposed project could potentially exacerbate an existing safety hazard for people residing or working within the vicinity of the project site because of the site's location within an airport land use plan. As such, the project proponent was required to obtain FAA approvals (Appendix I) and will need ALUC reviews and determinations for both Gillespie Field and MCAS Miramar for any construction equipment and operational structures proposed to be over 35 feet in height. No mitigation is required.

City of San Diego

Although the San Diego portion of the project lies within the ALUC Review Area 2, there are no structures proposed that would exceed 35 feet. Therefore, impacts would be less than significant.

Mitigation Measures

City of Santee

No mitigation is required.

City of San Diego

No mitigation is required.

Level of Significance after Mitigation

City of Santee

Impacts would be less than significant.

City of San Diego

Impacts would be less than significant.

Threshold 6: Would the proposed project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Discussion

Construction

Please refer to Section 3.18, Wildfire. The information relevant to this discussion (i.e., Threshold 6) is discussed in Threshold 1 of Section 3.18, Wildfire.

Threshold 7: Would the proposed project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, including in areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Impact Discussion

Please refer to Section 3.18, Wildfire. The information relevant to this discussion (i.e., Threshold 7) is discussed in Thresholds 2, 4, and 5 of Section 3.18, Wildfire.

3.8.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would implementation of the proposed project contribute to a significant cumulative impact to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The geographic context for the analysis of cumulative impacts relative to hazardous materials encompasses nearby facilities that regularly require the use of disposal of hazardous materials and the roadways and freeways used by vehicles transporting hazardous materials to and from the project site. Cumulative projects identified in the City of Santee (see Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis) include the construction of residential properties, commercial, and civic uses that would involve transport, use, and disposal of potentially hazardous materials typical of those uses.

However, the cumulative projects would be required to comply with regulations applicable to the transportation, use, and disposal of hazardous materials, including the RCRA, CERCLA, SARA, Hazardous Materials Transportation Act, and CCRs Title 22 and Title 27, which would ensure they do not result in a significant cumulative impact. As discussed above, operation of the proposed project is anticipated to use hazardous materials typically used in commercial and hotel establishments, and golf course operations. These hazardous materials typically include cleaning agents, paints, pesticides, fuels, propane, oil, batteries, and pool chemicals. These hazardous material products are generally used in small, localized amounts, and any spills that may occur are cleaned up as soon as they occur. Similar to the cumulative projects, the proposed project would also comply with federal, state, and local regulations to minimize the potential for adverse health effects related to the transport, use and disposal of hazardous materials. Consequently, the proposed project's contribution to a significant cumulative impact would not be cumulatively considerable.

Cumulative Threshold 2: Would implementation of the proposed project contribute to a significant cumulative impact to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The geographic context for the analysis of cumulative impacts relative to the accidental release of hazardous materials encompasses nearby facilities that regularly require the use or disposal of hazardous materials and the roadways and freeways used by vehicles transporting hazardous materials to and from the project site. Cumulative projects identified in Table 3-2 in Chapter 3 include the construction of residential properties, commercial, and civic uses that would involve an unquantifiable use of potentially hazardous materials at risk of accidental release. However, cumulative projects with the potential to accidentally release hazardous materials would be required to be in compliance with threshold quantities of hazardous substances listed in Chapters 6.95, 6.5, and 6.7 of the California Health and Safety Code. Compliance with these federal and state regulations would ensure that cumulative impacts do not result in a significant cumulative impact.

Operation of the proposed project would result in the use of small amounts of typical hazardous materials often used for the operation and maintenance of the golf course, hotel, and residences. These hazardous material products are generally used in small amounts, and any releases that occur are limited in scope and spill area and would be cleaned up soon after they occur. Consequently, the proposed project's contribution to a significant cumulative impact would not be cumulatively considerable.

Cumulative Threshold 3: Would implementation of the proposed project contribute to a significant cumulative impact related to emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The geographic context for the analysis of cumulative impacts to hazards to nearby schools is the City of Santee. Future development in the City of Santee may involve hazardous emissions or the handling of acutely hazardous materials, substances, or wastes within 0.25 miles of an existing or proposed primary or secondary school. Cumulative projects would be required to comply with regulations applicable to the use, disposal, and transportation of hazardous materials. Any potentially significant impacts would be reduced to a less than significant level through compliance with applicable regulations. Therefore, a significant cumulative impact would not occur with implementation of the proposed project.

As discussed above, operation of the proposed project would be consistent with the typical operation of a golf course, hotel, and residential uses, which do not result in emissions of hazardous materials or the use of large quantities of hazardous or acutely hazardous materials. Any hazardous materials (i.e., fertilizer, oils, fuels, pool chemicals, and cleaners) are generally used in small, localized amounts, and any spills that may occur are cleaned up as soon as they occur. The proposed project would comply with applicable hazardous materials and disclosure requirements for the handling, use, storage, and disposal of hazardous materials. Therefore, proposed project's contribution to cumulative impacts associated with hazardous emissions or handling of hazardous materials within 0.25 miles of an existing or proposed primary or secondary school would not be cumulatively considerable.

Cumulative Threshold 4: Would implementation of the proposed project contribute to a significant cumulative impact related to hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?

Implementation of the proposed project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment if the soil in this area is disturbed. However, pursuant to Appendix H1, Phase I Environmental Site Assessment, the preparers of the Phase I ESA have provided documentation that the current project design would avoid this area and that impacts would be less than significant. The geographic context for the analysis of cumulative impacts in regard to hazardous materials sites is the City of Santee, and one location in the City of San Diego, the Sycamore Landfill. Cumulative projects in the area (see Table 3-2) would have the potential to be located on or adjacent to existing contaminated sites. However, similar to the proposed project, discretionary projects would be reviewed for potential site contamination and appropriate measures to address risks to the public and environment would be required. For projects that do not require discretionary review, federal, state, and local regulations would require that any contamination that is encountered is reported to appropriate agencies and that appropriate precautions are taken to address risks to workers and the public. A significant cumulative impact would not occur with implementation of the proposed project. Therefore, the proposed project's contribution to hazardous materials sites would not be cumulatively considerable.

Cumulative Threshold 5: Would implementation of the proposed project contribute to a significant cumulative impact related to airport safety hazards or excessive noise for people residing or working in the project area?

The geographic context for the analysis of cumulative impacts in regard to airport safety hazards are the ALUCP boundaries for nearby airports. The majority of the cumulative projects are located in the general vicinity (less than 2 miles) of Gillespie Field and/or are within the Overflight Notification Area for MCAS Miramar. Potential risks associated with development in the vicinity of MCAS and Gillespie Field would be a factor in any decision to approve or deny future development proposals. Land uses that may be impacted by the airport are reviewed and regulated through the ALUCP, the City of San Diego, and the San Diego Regional Airport Authority. Cumulative projects would be required to obtain an ALUC Consistency Determination (where applicable) similar to the project. As a result, cumulative project risks of future development located in proximity to MCAS Miramar and Gillespie Field would not result in a significant impact. As discussed above, the project site does not fall within the noise exposure area for Gillespie Field. As such, the project is not expected to result in or exacerbate excessive noise related to a public airport. Therefore, the proposed project's contribution to safety hazards or to excessive noise related to airports would not be cumulatively considerable.

Cumulative Threshold 6: Would implementation of the proposed project contribute to a significant cumulative impact related to emergency response plans or emergency evacuation plans?

Please refer to Section 3.18, Wildfire. The information relevant to this discussion (i.e., Cumulative Threshold 6) is discussed in Threshold 1 of Section 3.18, Wildfire.

Cumulative Threshold 7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, including in areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Please refer to Section 3.18, Wildfire. The information in this discussion (i.e., Cumulative Threshold 7) is discussed in Thresholds 2, 4, and 5 of Section 3.18, Wildfire.

3.8.7 Summary of Significant Impacts

There would be no significant impacts associated with hazards and hazardous materials.

3.8.8 References

ALUC (Airport Land Use Commission). 2010. *Gillespie Field Airport Land Use Compatibility Plan*. December 20. Available: https://www.san.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?EntryId=16146&Command=Core_Download&language=en-US&PortalId=0&TabId=807. Accessed: February 15, 2023.

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3.9 Hydrology and Water Quality

3.9.1 Overview

This section describes the existing conditions and applicable laws and regulations for hydrology and water quality, followed by an analysis of the proposed Carlton Oaks Country Club and Resort Project (project). Information in this section was informed by the following reports:

- Drainage Report for Carlton Oaks Country Club & Resort TM 2019-1/DR 2019-5; prepared by Hunsaker & Associates San Diego Inc., March 21, 2025 (Appendix J1)
- Carlton Oaks Country Club and Resort Driving Range Berm Drainage and Flood Assessment; prepared by Hunsaker & Associates, October 30, 2024 (Appendix J2)
- Storm Water Quality Management Plan (SWQMP) for Carlton Oaks Country Club & Resort PA-1, PA-2, & PA-3 TM 2019-1/DR 2019-5; prepared by Hunsaker & Associates, March 21, 2025 (Appendix K)
- Flood Study Conditional Letter of Map Revision (CLOMR) for Carlton Oaks Country Club & Resort TM 2019-1/DR 2019-5; prepared by Hunsaker & Associates, March 21, 2025 (Appendix L)

3.9.2 Environmental Setting

This section describes the hydrology and water quality settings of the project site.

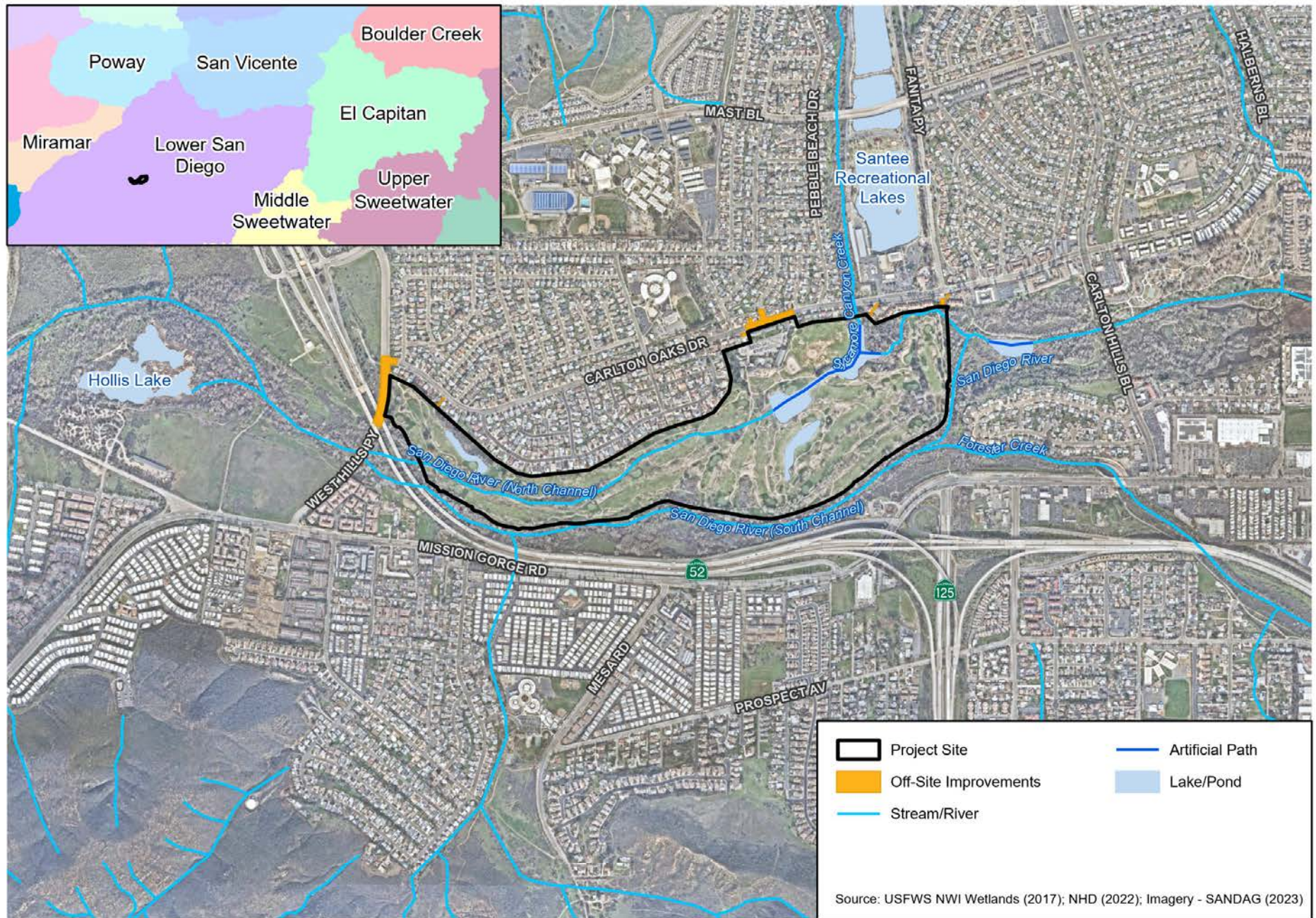
3.9.2.1 Existing Surface Water Hydrology and Water Quality Conditions

Surface Water Hydrology

The project site is located within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB). The San Diego region is divided into 11 hydrologic units (HUs) for administrative purposes. Each of the HUs flow from elevated regions in the east to lagoons, estuaries, or bays in the west and feature similar water quality characteristics and issues. The proposed project is within the Lower San Diego Hydraulic Area (HA), which is within the San Diego River Watershed, as shown in Figure 3.9-1, Hydrologic Features in the Project Area. The San Diego Watershed Management Area (WMA) is the most populous WMA in San Diego County, and the vast majority of the population is concentrated in the more developed urban and suburban regions of the lower watershed.

The San Diego River WMA contains four hydrologic areas: Lower San Diego (907.1), San Vicente (907.2), El Capitan (907.3), and Boulder Creek (907.4). Major water features within the San Diego River WMA include San Diego River, El Capitan Reservoir, Lake Murray, Boulder Creek, and Santee Recreational Lakes (Project Clean Water 2023). The watershed is drained by San Diego River, which discharges into the Pacific Ocean between Mission Beach and Ocean Beach in the City of San Diego. Average annual precipitation ranges from 10.5 inches near the coast to nearly 35 inches in the eastern portion of the watershed.

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The project site is located in the Lower San Diego HA, which is the most urbanized HA and covers approximately 172 square miles. The Lower San Diego HA consists of undeveloped and open lands that account for approximately 43% of the land area and residential uses that account for 30% (Project Clean Water 2023). San Diego River (including the North and South Channels), Forester Creek, and wetlands are adjacent to the golf course.

Due to its geographic extent, oversight of the storm drain systems within the Lower San Diego HA falls to a number of co-permittees: namely, the County of San Diego in combination with the Cities of Santee, El Cajon, La Mesa, and San Diego.

Surface Water Quality

Major impacts on the San Diego River WMA include surface water quality degradation, habitat degradation and loss, sediment, invasive species, eutrophication, and flooding. Table 3.9-1 lists the water bodies in the project area that are on the Clean Water Act (CWA) 303(d) list. Constituents resulting in water bodies being placed on the CWA 303(d) list include bacterial indicators, benthic community effects, cadmium, total dissolved solids (TDS), phosphorus, dissolved oxygen, and nitrogen (RWQCB 2021). Factors that may impair water quality in the WMA include urban runoff, agricultural runoff, sewage spills, and other natural sources.

Table 3.9-1. Water Bodies Within the Project Area

Water Body	303(d) Impairments	Source	TMDL Completion Date
Sycamore Canyon	Dissolved Oxygen	Unknown	2025
Forester Creek	Benthic Community Effects	Unknown	2025
	Indicator Bacteria	Unknown	Adopted 2011
	Nitrogen	Unknown	2029
	Phosphorus	Unknown	2019
	Selenium	Unknown	2019
	Chloride	Unknown	2033
	Oxygen, Dissolved	Unknown	2033
	Turbidity	Unknown	2033
	Total Dissolved Solids	Unknown	2019
Lower San Diego River	Benthic Community Effects	Unknown	2025
	Oxygen, Dissolved	Unknown	2033
	Phosphorus	Unknown	2019
	Indicator Bacteria	Unknown	Adopted 2011
	Bifenthrin	Unknown	2033
	Chlordane	Unknown	2033
	Nitrogen	Unknown	2029
	Total Dissolved Solids	Unknown	2019
	Toxicity	Unknown	2025
	Chloride	Unknown	2033
	Color	Unknown	2033
	Cyfluthrin	Unknown	2033
	Cypermethrin	Unknown	2033
	Permethrin	Unknown	2033
	Pyrethroids	Unknown	2033

Table 3.9-1. Water Bodies Within the Project Area

Water Body	303(d) Impairments	Source	TMDL Completion Date
	Turbidity	Unknown	2033

Source: SWRCB 2022.

TMDL = total maximum daily load.

The *San Diego Region – The Basin Plan* (Basin Plan) lists the San Diego River Watershed’s beneficial surface uses as municipal and domestic supply, agricultural supply, industrial-process supply, industrial-service supply, contact water recreation, non-contact water recreation, warm freshwater habitat, cold freshwater habitat, wildlife habitat, and spawning, reproduction, and/or early development (RWQCB 2021).

The Lower San Diego system consists of a number of water bodies listed as impaired under CWA Section 303(d). Water bodies listed as impaired within the vicinity of the project site include Forester Creek, Lower San Diego River, and San Diego River (North Channel). These water bodies have been affected by pollutants such as fecal coliform, nitrogen, phosphorus, TDS, and low dissolved oxygen.

3.9.2.2 Existing Drainage Conditions

The City of Santee’s stormwater-conveyance system, which includes streets, sidewalks, and gutters, conveys surface water runoff from rain, irrigation, and outdoor waterways without treatment. The stormwater-conveyance system was designed to prevent flooding by transporting water away from developed areas. A significant portion of the City of Santee drains directly to San Diego River, although portions of Santee drain first to other receiving water bodies, such as Forester Creek and San Diego River (North Channel), which are ultimately discharged into San Diego River. Refer to Figure 3.9-2.

The project site receives runoff from San Diego River, Sycamore Canyon Creek, and storm drain outfalls from the existing neighborhoods along the Carlton Oaks Drive and Mast Boulevard corridors. San Diego River (North Channel) conveys flows to the San Diego River and enters the site near the northeastern end of the golf course under the existing Carlton Oaks Bridge. Carlton Oaks Drive crosses over Sycamore Canyon Creek northeast of proposed Residential North, and runoff from Forester Creek joins the San Diego River (South Channel). The project site includes two existing public storm drain extensions. Existing drainage pipes discharge into the golf course in four locations along the northern subdivision boundary: (1) through a 42-inch-diameter storm drain; (2) a 27-inch-diameter storm drain; and (3) an 18-inch-diameter storm drain; and (4) a 47-inch by 71-inch storm drain which is also located within a public easement. Storm drain facilities located off site include an existing 72-inch-diameter storm drain pipe that discharges at the northern property line of Residential West. The existing headwall includes a large, concrete energy dissipator and concrete channel (Appendix J1).

The property includes an earthen berm, the South Channel, along the southern and eastern limits, which directs low flows from the San Diego River (South Channel) and Forester Creek along the southerly golf course limits. The berm consists of loosely placed soil that was graded and is relatively small compared to the overall river width. The North Channel conveys runoff from Sycamore Canyon Creek, which enters the site near the northeastern end of the golf course. Flows are directed southward and westward through the northern limits of the golf course through a variety of golf course water features, including streams, water hazards, and manufactured ponds. The North Channel provides drainage relief for overland flows from the majority of the golf course and the neighborhoods north of the property. Flows from the South and North Channels join at the western end of the earthen berm. Vegetation along the sides has naturally reinforced the berm, allowing it to stand up to large flooding events

(Appendix L). Downstream of the Carlton Oaks Bridge, the presence of dense riparian vegetation reduces and restricts the flow of water at the confluence of Sycamore Canyon Creek and San Diego River.

Driving Range Remedial Work

In 2023, as part of the existing golf course's continued operations, soil extracted from another project was transported to the project site to create a berm to aid in golf ball retention. In total, approximately 1,000 cubic yards were moved to the existing driving range during a year-long period. The soil was spread on the site's natural surface contours to create a berm along the outer edge of the driving range, adjacent to Sycamore Canyon Creek. No subsurface disturbance occurred as a result of the soil deposition.

On August 19, 2024, the City of Santee issued a Notice of Violation to the landowner of the project site. The Notice of Violation identified the transportation of the dirt to the driving range without the required permit as a violation of the City of Santee Municipal Code. The applicant was directed to remove the transported dirt from the driving range and restore the area to preconstruction conditions to the satisfaction of the City of Santee Engineer.

By the end of 2024, the soil and berm were removed, and the soil was transported off site. The driving range at the project site was returned to its existing topographic contours prior to the soil deposition. The remediation work involved removing the soil and berm from the driving range to restore the site to its original condition. The 1,000 cubic yards of soil was transported off site to a residential construction site located just north of Robertson Street and west of Day Street in the unincorporated town of Ramona, approximately 25 miles away.

Although the potential remedial measures are not components of the currently proposed project, the City of Santee has requested that the Environmental Impact Report (EIR) include information regarding these remedial measures for informational purposes, which is more particularly described in the Carlton Oaks Country Club Driving Range Hydrology Letter (Appendix J2). The removal of the berm would not affect the drainage or flood analysis of the project.

3.9.2.3 Existing Groundwater Conditions

The project site is located within San Diego River Valley Groundwater Basin Number 9-15 (the Basin). The total surface area of the Basin is approximately 9,890 acres (i.e., 15.4 square miles). Consisting of alluvium deposited by San Diego River and its tributaries, the Basin is surrounded by contacts with semipermeable rocks of the Eocene Poway Group, impermeable Cretaceous crystalline rock, and impermeable Jurassic to Cretaceous Santiago Peak volcanic rocks. Average annual precipitation ranges from 11 to 15 inches (DWR 2004). Because the Basin is a very low-priority basin, no groundwater sustainability plan is required.

Onsite Wells

There are four existing irrigation wells within the golf course area. The depths of the wells are approximately 840 to 960 feet below land surface (ft bl.) and yield approximately 200 to 250 gallons per minute (gpm). The water from these wells is currently used to fill the irrigation pond south of the country club building. Water is then pumped back out of the pond as needed to irrigate the golf course. Under existing conditions, there are approximately 132 acres of golf course turf that is irrigated with water from these wells. These four wells are a necessary part of the golf course operations and maintenance, and all four would be retained during and after construction. None of the four wells are proposed to be abandoned or capped.

All four of the wells have an assigned County of San Diego Department of Environmental Health (DEH) Permit No./Well Completion Report No.; however, detailed information on well No. 1, which is the oldest well onsite, is limited.

- Well No. 1 (W03239) – Drilled April 1991 to unknown depth
- Well No. 2 (W05416/449152) – Drilled September 1996 to 840 ft bls
- Well No. 3 (LWEL 21156) – Drilled May 2012 to 960 ft. bls.
- Well No. 4 (LWEL 000201/L WEL 21049) – Drilled August 2013 to 930 ft. bls., and again in September 2015 to 940 ft. bls.

Well No. 2, 3, and 4 were drilled into fractured granitic rock. The wells were completed with a steel conductor casing set in cement to seal off the upper sand, gravel, and decomposed granite and isolate groundwater production from the fractured granite aquifer below. The wells encountered major water-bearing fractures beginning at 840 to 960 feet ft bls. Yields at these depths ranged from 120 to 150 gpm with fractures as deep as 1,200 ft bls that increased the total well yield to 200 gpm.

Well No. 4 was originally drilled to 930 ft bls in August 2013. The borehole diameter was 6 inches. The well yielded approximately 120 gpm. In September 2015, the well was reamed to a larger diameter of 10 inches and the depth extended down to 940 ft bls (an extra 10 feet). The well yielded approximately 200 gpm after the ream (Stehly Brothers Drilling, 2015).

Groundwater Level

Groundwater storage capacity of the Basin is estimated to be approximately 24,000 acre-feet in Quaternary alluvium. Historically, the primary recharge sources were stream runoff from San Diego River and San Vicente Creek. The El Capitan and San Vicente dams were completed in 1935 and 1943, respectively, and have altered recharge patterns. Currently, recharge occurs from dam releases and underflow past the dams. Other sources of recharge are stream flow from Forester Creek and other smaller creeks, precipitation falling on the valley floor, and discharges from municipal wastewater-treatment plants (DWR 2004).

Groundwater levels in the Basin, on average, were mostly within a few feet of land surface prior to 1945. After inception of groundwater development, water levels began to decline, but rose in the 1980s due to a series of wet years (DWR 2004).

Groundwater Quality

Groundwater quality in the eastern portion of the Basin contains water of a bicarbonate character, whereas the western portion contains water of a chloride character. TDS concentration ranges from 260 to 2,870 milligrams per liter (mg/L), with higher values to the west and lower values to the east. Department of Health Services data for two wells show the TDS concentration ranging from 591 to 870 mg/L (DWR 2004). In general, TDS, chloride, and sodium content of the groundwater exceed the recommended limits for drinking water (DWR 2004).

Based on information found on the California Water Boards Groundwater Ambient Monitoring and Assessment (GAMA) Groundwater Information System for wells in the vicinity of the Carlton Oaks Golf Course, there are no active sites, open remediation cases or contaminant sources within 0.5 mile of the Golf Course that could negatively impact water quality in the four on-site irrigation wells.

3.9.2.4 Water-Related Hazards

Flooding

Flooding is a general or temporary condition of partial or complete inundation of normally dry land areas. Flooding is commonly associated with the overflow of natural rivers or streams, but can also occur near stormwater facilities, dams, or in low-lying areas not designed to carry water. Flooding can be induced by precipitation or can result from increased rates and amounts of runoff and altered drainage patterns. Within the City of Santee, a total of 1,020 acres are within the floodplain of the San Diego River, approximately 596 acres within the floodway and 424 acres within the floodplain fringe. The Forester Creek floodplain is estimated to cover an area of approximately 100 acres, and Sycamore Canyon Creek is estimated to cover approximately 42 acres. Historical records indicate extensive flood damage to surrounding areas along San Diego River and, to a lesser extent, Forester Creek. Urban development and associated runoff to major waterways may result in localized flooding problems (Appendix L). Sycamore Canyon Creek flows adjacent to Santee Recreational Lakes, residential homes, and the Padre Dam Waste Treatment Plant. Sycamore Canyon Creek does not have the capacity to contain the 100-year storm event within the channel banks. As a result, portions of the surrounding properties have historically been inundated (Rick Engineering 2007). Most of the project site is within a mapped Federal Emergency Management Agency (FEMA) flood zone and within the regulatory limits of the San Diego River floodway (see Figure 3.9-2, FEMA Flood Zones and County Dam Inundation Zone). The majority of the proposed Residential West is within the existing floodplain, a small portion of the southwestern corner of the proposed Residential North is also in the existing floodplain, and the proposed resort area is located within the existing floodplain and floodway (Appendix L).

Dam Failure, Tsunamis, and Seiches

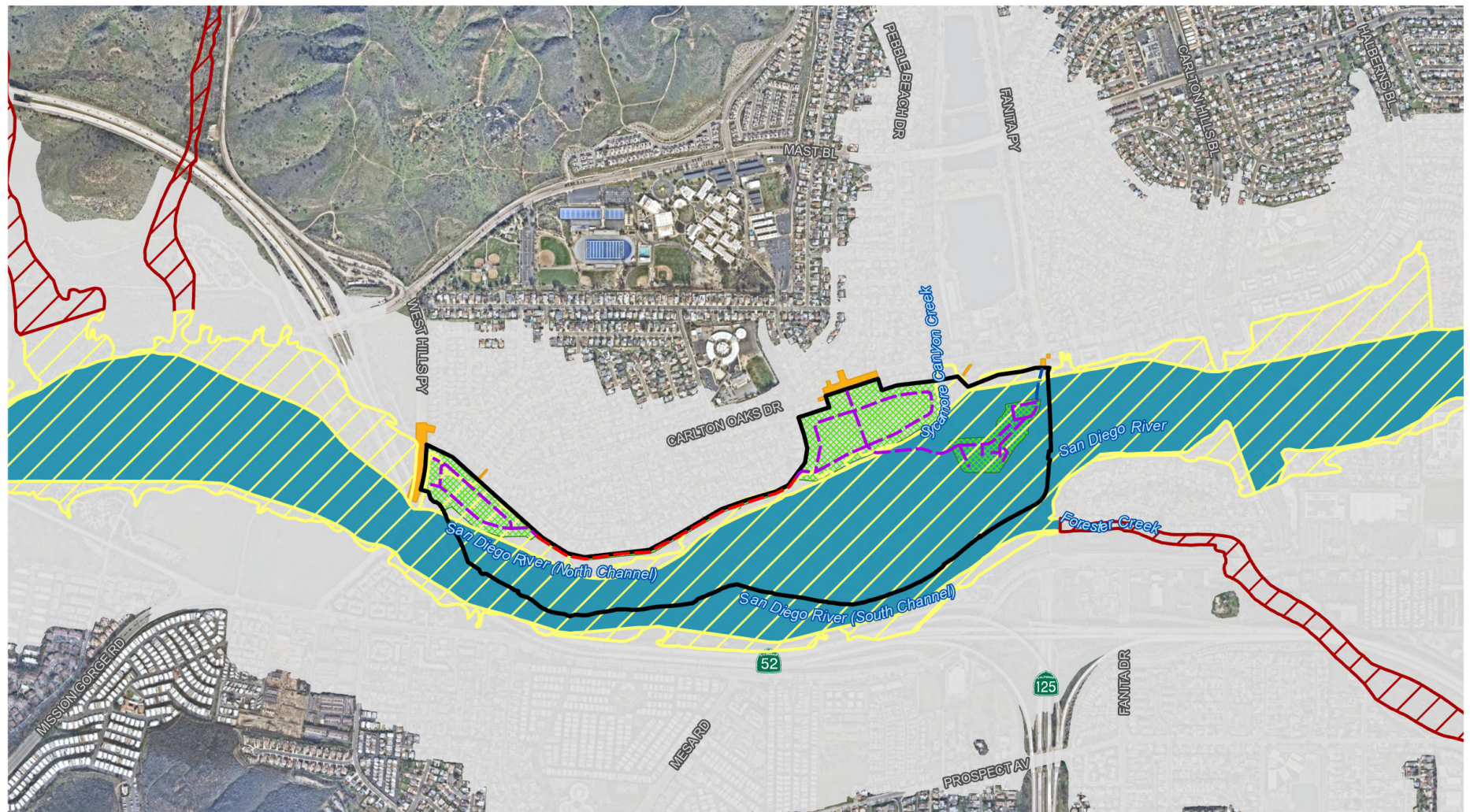
Flooding could also result from dam failure, tsunamis, or seiches. *Dam inundation* is flooding caused by the release of impounded water from structural failure or overtopping of a dam. Seiches or tsunamis can result from abrupt movements of large volumes of water due to earthquakes, landslides, volcanic eruptions, meteoric impacts, or onshore slope failure. The project site is located within a County Dam Inundation Zone, as shown in Figure 3.9-2. The project site is subject to inundation associated with the Padre, El Capitan, San Vicente, and Chet Harritt dams.

A *seiche* is a standing wave in a completely or partially enclosed body of water. Areas located along the shoreline of a lake or reservoir are susceptible to inundation by a seiche. High winds, seismic activity, or changes in atmospheric pressure are typical causes of seiches. The size of a seiche and the affected inundation area is dependent on different factors, including size and depth of the water body; elevation; source; and, if artificial, the structural condition of the body of water in which the seiche occurs.

Most enclosed water bodies are reservoirs built by local municipalities and water districts to provide water service to local residents and businesses. Typically, all lands around the reservoirs' shorelines are in public holdings, such as the City of San Diego, which restrict private land development and minimize risk of inundation from seiches. Enclosed bodies of water within the project site vicinity include Santee Recreational Lakes, north of the project site, and Lake Murray, south of the project site.

Considering the project location in relation to the ocean and proposed grade elevation (305 to 325 feet above mean sea level), the site is not located within a tsunami inundation zone. *Seiche-related phenomena* are defined as being proximal to a lake, reservoir, or bay. The project site is not near a large body of water such as those; however, is in proximity to the San Diego River, as discussed above (see Appendix G1, Geotechnical Investigation).

The *Geotechnical/Seismic Hazard Study for the Safety Element of the Santee General Plan* (City of Santee 2021a) identifies the site as being within the zone of inundation in the San Diego River Valley, downstream of three major dams in the County of San Diego. These include the San Vicente, El Capitan, and Chet Harrit (Lake Jennings) dams. According to the Geocon report, maps prepared in the 1970s indicate that the project site is located within the inundation limits, when considering complete failure of any one of the three dams. Information concerning the safety of these dams, which is reviewed annually by the California Department of Water Resources, Division of Dam Safety, may be obtained from that department.



- | | | | |
|-----------------------|--|-------------------------------|---------------------|
| Project Site | Emergency Vehicle Access Only | County Dam Inundation Zone | 100-Year Floodplain |
| Development Boundary | Residential / Resort Circulation Roadway | FEMA Flood Zones | Regulatory Floodway |
| Off-Site Improvements | Private Utility Maintenance Road | 1% Annual Chance Flood Hazard | |

Source: FEMA Floodplains (2014); DWR - Dam Inundation (2022); Imagery - SANDAG (2023)

DUDEK



0 750 1,500
Feet
Scale: 1:18,000

Figure 3.9-2
FEMA Flood Zones and County Dam Inundation Zone

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3.9.3 Applicable Laws and Regulations

3.9.3.1 Federal

Clean Water Act

The primary goals of the CWA are to restore and maintain the chemical, physical, and biological integrity of the nation's waters and make all surface waters fishable and swimmable. The U.S. Environmental Protection Agency (USEPA) is the lead federal agency responsible for water quality management. The CWA of 1972 (33 United States Code [USC] Sections 1251–1387) is the primary federal law that governs and authorizes water quality control activities by USEPA, as well as the states. The federal CWA of 1977 (33 USC 1251 et seq.), which amended the federal Water Pollution Control Act of 1972, established the basic structure for regulating discharges of pollutants into the waters of the United States (not including groundwater). Under the CWA, it is unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a National Pollutant Discharge Elimination System (NPDES) permit is obtained and implemented within compliance. In addition, the CWA requires the states to adopt water quality standards for receiving water bodies and have those standards approved by USEPA. *Water quality standards* consist of designated beneficial uses for a particular receiving water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses.

Section 303: Impaired Water Bodies (303[d] List) and Total Maximum Daily Loads

Under Section 303(d) of the CWA, the State Water Resources Control Board (SWRCB) is required to develop a list of impaired water bodies that do not meet water quality standards (promulgated under the National Toxics Rule or the California Toxics Rule) after the minimum technology-based effluent limitations have been implemented for point sources. Lists are to be priority ranked for development of total maximum daily loads (TMDLs), calculations of the total maximum amount of a pollutant that a water body can receive on a daily basis and still safely meet water quality standards. The California RWQCBs and USEPA are responsible for establishing TMDL waste-load allocations and incorporating improved load allocations into water quality control plans, NPDES permits, and waste discharge requirements. CWA Section 305(b) requires that states assess the status of water quality conditions within the state in a report to be submitted every 2 years to USEPA.

Both CWA requirements are being addressed through the development of a CWA 303(d)/305(b) Integrated Report, which would address both an update to the CWA 303(d) list and a CWA 305(b) assessment of statewide water quality. The SWRCB developed a statewide 2014 and 2016 California Integrated Report based on the Integrated Reports from each of the nine RWQCBs. The 2020–2022 California Integrated Report was approved by the SWRCB at a public hearing on January 19, 2022, and USEPA issued its final decision and approval on May 11, 2022 (SWRCB 2022).

All of the CWA 303(d)-listed impaired waters with potential to be affected by the proposed project would be evaluated as part of the project, and minimization measures would be implemented to protect waters from further water quality impairment.

Section 402: National Pollutant Discharge Elimination System Permits

CWA Section 402(p) was amended in 1987 to require USEPA to establish regulations for permitting of municipal and industrial (including active construction sites) stormwater discharges under the NPDES permit program. USEPA published final regulations for industrial and municipal stormwater discharges on November 16, 1990. The NPDES

program requires all industrial facilities and municipalities of a certain size that discharge pollutants into waters of the United States to obtain a permit. Stormwater discharges in California are commonly regulated through general and individual NPDES permits, which are adopted by the SWRCB or RWQCBs and administered by the RWQCBs. USEPA requires NPDES permits to be revised to incorporate waste-load allocations for TMDLs when the TMDLs are approved (40 Code of Federal Regulations [CFR] 122).

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, or other activities.

The proposed project would be required to comply with the local NPDES permit, described below under Section 3.9.3.4, Local.

Federal Emergency Management Agency

FEMA administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA also issues Flood Insurance Rate Maps that identify which land areas are subject to flooding, provide flood information, and identify flood hazard zones in the community. FEMA established the design standard for flood protection; their minimum level of flood protection for new development is the *100-year flood event*, also described as a flood that has a 1-in-100 chance of occurring in any given year.

Levee systems are evaluated for their ability to provide protection from 100-year flood events, and the results of this evaluation are documented in the FEMA Levee Inventory System. Levee systems must meet minimum freeboard standards and be maintained according to an officially adopted maintenance plan. Other FEMA levee-system evaluation criteria include structural design and interior drainage. A CLOMR and Letter of Map Revision (LOMR) would be processed through FEMA to revise the flood mapping at the project site.

National Flood Insurance Program

FEMA established the National Flood Insurance Program (NFIP) in order to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps that identify Special Flood Hazard Areas (SFHA). An SFHA is an area that would be inundated by the 1% annual chance flood, which is also referred to as the base flood or 100-year flood.

3.9.3.2 State

The Porter–Cologne Water Quality Control Act

The Porter–Cologne Water Quality Control Act (embodied in the California Water Code) of 1969 (Porter-Cologne Act) is California’s statutory authority for the protection of water quality. Under the Porter-Cologne Act, the state must adopt water quality policies, plans, and objectives that protect its waters for the use and enjoyment of the people. Under the California Water Code, the State of California is divided into nine regions governed by RWQCBs that, under the guidance and review of the SWRCB, implement and enforce provisions of the California Water Code and the CWA. The project site is located in Region 9, the San Diego region, and governed by the San Diego RWQCB.

The Porter-Cologne Act also requires waste dischargers to notify the RWQCBs of their activities through the filing of Reports of Waste Discharge and authorizes the SWRCB and RWQCBs to issue and enforce waste discharge requirements, NPDES permits, CWA Section 401 water quality certifications, or other approvals.

California Water Code Section 13050 defines what is considered pollution, contamination, or nuisance. Briefly defined, *pollution* means an alteration of water quality such that it unreasonably affects the beneficial uses of water, *contamination* means an impairment of water quality to the degree that it creates a hazard to public health, and *nuisance* is defined as anything that is injurious to health, offensive to the senses, or an obstruction to property use and that affects a considerable number of people.

Construction Storm Water Permit and Storm Water Pollution Prevention Plan

Construction activities that disturb 1 acre or more of land must obtain coverage under the SWRCB Construction General Permit (Order 2022-0057-DWQ). Under the terms of the permit, applicants must file complete and accurate Notice of Intent and permit registration documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction best management practices (BMPs) and prepare a construction Storm Water Pollution Prevention Plan (SWPPP) that contains a site map showing the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater-collection and -discharge points, general topography both before and after construction, and drainage patterns across the project site.

The proposed project would be required to comply with the 2022 Construction General Permit because it would disturb more than 1 acre during construction.

Sustainable Groundwater Management Act

California enacted the Sustainable Groundwater Management Act in 2014. The Act requires the formation of local groundwater sustainability agencies to address conditions in their local water basins and adopt locally based management plans. The requirements of the Act include the following:

1. Developing regulations to revise groundwater basin boundaries
2. Adopting regulations for evaluating and implementing groundwater sustainability plans and coordination agreements
3. Identifying basins subject to critical conditions of overdraft
4. Identifying water available for groundwater replenishment
5. Publishing BMPs for the sustainable management of groundwater

The Act requires that groundwater basins reach sustainable yield and sets a 20-year timeline for implementation. Critically overdrafted basins must achieve groundwater sustainability by 2040 or 2042, and critically overdrafted high- and medium-priority basins must be managed under a groundwater sustainability plan by January 31, 2020. Other high- and medium-priority basins must be managed under groundwater sustainability plans by January 31, 2022. The Act recognizes that groundwater is managed at the local or regional level and that geographic, geologic, and hydrologic differences account for groundwater supply.

The goal of the legislation is reliable groundwater management, which is defined as “the management and use of groundwater in a manner that can be maintained during the planning implementation horizon without causing

undesirable results” (California Water Code Section 10721). Undesirable results are defined as any of the following effects:

- Chronic lowering of groundwater levels (not including overdraft during a drought if a basin is otherwise managed)
- Significant and unreasonable reduction of groundwater storage
- Significant and unreasonable seawater intrusion
- Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies
- Significant and unreasonable land subsidence that substantially interferes with surface land uses
- Depletions of interconnected surface water that have significant and unreasonable adverse effects on beneficial uses of surface water

The state has designated the Basin, where the project site is located, as a medium-priority basin. Therefore, the proposed project would be subject to the Sustainable Groundwater Management Act.

3.9.3.3 Regional

Water Quality Control Plan (Basin Plan)

The preparation and adoption of water quality control plans (i.e., Basin Plans) is required by the California Water Code Section 13240, as prescribed by the CWA. CWA Section 303 requires states to adopt water quality standards that “consist of the designated uses of the navigable waters involved and the water quality criteria for such waters based on such uses.” According to California Water Code Section 13050, Basin Plans consist of a designation or establishment of beneficial uses to be protected, water quality objectives to protect those uses, and a program of implementation needed for achieving the objectives for the waters within a specified area. Because beneficial uses, together with their corresponding water quality objectives, can be defined per federal regulations as water quality standards, Basin Plans are regulatory references for meeting the federal and state requirements for water quality control.

Beneficial Uses

The San Diego RWQCB has designated beneficial uses and water quality objectives for water bodies under its jurisdiction (RWQCB 2021), defined as the uses of water necessary for the survival or well-being of humans, plants, and wildlife. These uses of water serve to promote the tangible and intangible economic, social, and environmental goals of humankind. Examples include drinking, swimming, industrial, and agricultural water supply and the support of fresh and saline aquatic habitats (RWQCB 2021).

Due to the project site’s location, receiving waters include San Diego River, Forester Creek, and San Diego River (North Channel), the designated beneficial uses of which include the following:

- **Industrial Service Supply (IND)** includes use of water for industrial activities that do not depend primarily on water quality, including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well repressurization.
- **Contact Water Recreation (REC1)** includes uses of water for recreational activities that involve body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to,

swimming, wading, water-skiing, snorkeling, SCUBA diving, surfing, white-water activities, fishing, or the use of natural hot springs.

- **Non-Contact Water Recreation (REC2)** includes the uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
- **Cold Freshwater Habitat (COLD)** includes uses of water that support cold-water ecosystems, including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
- **Warm Freshwater Habitat (WARM)** includes uses of water that support warm-water ecosystems, including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
- **Wildlife Habitat (WILD)** includes uses of water that support terrestrial ecosystems, including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife, or wildlife water and food sources.
- **Rare, Threatened, or Endangered Species (RARE)** includes uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under federal or state law as rare, threatened, or endangered.
- **Municipal and Domestic Supply (MUN)** includes uses of water for community, military, or individual water-supply systems, including, but not limited to, drinking-water supply.
- **Agricultural Supply (AGR)** includes uses of water for farming, horticulture, or ranching, including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.

Water Quality Objectives

The Basin Plan sets narrative and numerical water quality objectives that must be attained or maintained to protect beneficial uses and conform to the state's degradation policy. Water quality objectives are the levels of water quality constituents that must be met to protect the beneficial uses (RWQCB 2021). Table 3.9-2 includes a summarized list of these water quality constituents that received narrative or numerical concentration objectives. Surface water quality objectives for the Lower San Diego River HA are shown in Table 3.9-3. A complete and detailed list of water quality objectives can be found in the Basin Plan. Each water quality constituent may result in varied objectives conditional on the beneficial use of the waters.

Table 3.9-2. Water Quality Constituents

Constituent	Notes
Bacteria	Total coliform, fecal coliform, <i>E. coli</i> , and <i>enterococci</i> .
Biostimulatory Substances	Substances that stimulate the body's cells to function optimally, thus regenerating tissues.
Boron	Boron is not considered harmful in drinking waters in concentrations up to 30 mg/L. Boron occurs as sodium borate (borax) or as calcium borate (colemanite) in mineral deposits and natural waters of southern California.
Chlorides	Most waters contain chlorides because they are present in many rock types and are very soluble in water. Chlorides may be of natural mineral origin or derived from (a) seawater

Table 3.9-2. Water Quality Constituents

Constituent	Notes
	intrusion of groundwater supplies, (b) salts spread on fields for agricultural purposes, (c) human or animal sewage or (d) industrial wastes.
Color	Color in water may arise naturally, such as from minerals, plant matter, or algae, or may be caused by industrial pollutants.
Dissolved Oxygen	Dissolved oxygen content in water is a function of water temperature and salinity.
Floating Material	Floating material is an aesthetic nuisance as well as a substrate for algae and insect vectors.
Fluoride	Fluoride does not naturally occur in high concentrations in surface waters, but may occur in detrimental concentrations in groundwaters. Fluoride, in sufficient quantities, can adversely affect waters used as industrial process or supply in food, beverages, and pharmaceutical industries.
Inorganic Chemicals ¹	Waters designated for use as domestic or municipal supply cannot contain concentrations of inorganic chemicals in excess of the maximum contaminant levels set forth in California Code of Regulations Title 22, Section 64431, Table 64431-A (Inorganic Chemicals), which is incorporated by reference into the Basin Plan. Inorganic chemicals include aluminum, antimony, arsenic, asbestos, barium, beryllium, cadmium, chromium, cyanide, fluoride, mercury, nickel, nitrate, nitrate+nitrite, nitrite, selenium, and thallium.
Iron	Iron may be present in water due to natural origin, corrosion of metallic iron and its alloys by water in the presence of oxygen, and industrial waste discharges containing iron.
Manganese	Manganese is undesirable in domestic water supplies because it causes unpleasant tastes, deposits on food during cooking, stains and discolors laundry and plumbing fixtures, and fosters the growth of some microorganisms in reservoirs, filters, and distribution systems.
Methylene Blue–Activated Substances	The methylene blue activated substances (MBAS) test measures the presence of anionic surfactant (commercial detergent) in water. Positive test results can be used to indicate the presence of domestic wastewater.
Nitrate	High nitrate (NO ₃) concentrations in domestic water supplies can be toxic to human life.
Oil and Grease	Oil and grease can be present in water as a result of the discharge of treated wastes and the accidental or intentional dumping of wastes into sinks and storm drains. Oils and related materials form a film on the water's surface which can result in nuisance conditions because of offensive odors and visual impacts.
Organic Chemicals	Organic chemicals include volatile organic chemicals (VOCs) such as benzene and carbon tetrachloride as well as non-volatile synthetic organic chemicals (SOCs) such as chlordane and endrin.
Pesticides	Pesticides can enter surface and groundwaters directly through industrial process discharges, agricultural discharge, spillage, and illegal dumping. Although many pesticides are designed to deteriorate rapidly when exposed to sunlight and air, they may persist for months or years in water.
pH	The acidity or alkalinity of water is measured by the pH factor.
Phenolic Compounds	Phenolic compounds are in widespread use as industrial and agricultural chemical intermediates for the preparation of other chemicals. These organic compounds are byproducts of petroleum refining, tanning, and textile, dye, and resin manufacturing. Low concentrations cause taste and odor problems in water, higher concentrations can kill aquatic life and humans. Phenol is occasionally referred to as "carbolic acid."
Radioactivity	Radionuclides shall not be present in concentrations that are deleterious to human, plant, animal, or aquatic life nor that result in the accumulation of radionuclides in the food web to an extent that presents a hazard to human, plant, animal, or aquatic life.

Table 3.9-2. Water Quality Constituents

Constituent	Notes
Secondary Drinking Water Standards ²	Water designated for use as domestic or municipal cannot contain concentrations of chemical constituents in excess of the maximum contaminant levels specified in California Code of Regulations Title 22, Section 64449, Table 64449-A (Secondary Maximum Contaminant Levels, Consumer Acceptance Limits), which is incorporated by reference into the Basin Plan. Includes aluminum, color, copper, corrosivity, foaming agents, iron, manganese, methyl tert-butyl ether, odor threshold, silver, thiobencarb, turbidity, and zinc.
Sediment	Suspended sediment in surface waters can cause harm to aquatic organisms by abrasion of surface membranes, interference with respiration, and sensory perception in aquatic fauna. Suspended sediment can reduce photosynthesis in and survival of aquatic flora by limiting the transmittance of light.
Sodium	Excess concentrations of sodium in irrigation water reduces soil permeability to water and air. The deterioration of sodium in irrigation water is cumulative and is accelerated by poor drainage.
Sulfate	The most important sources of sulfate in native waters of the San Diego region are the gypsiferous deposits and sulfide minerals associated with crystalline rocks.
Suspended and Settleable Solids	Suspended and settleable solids are deleterious to benthic organisms and may cause the formation of anaerobic conditions. They also screen out light, hindering photosynthesis and normal aquatic plant growth and development.
Tastes and Odors	Undesirable tastes and odors in water may be a nuisance and may indicate the presence of pollutants.
Temperature	Waste discharges can cause temperature changes in the receiving waters which adversely affect the aquatic biota. Discharges most likely to cause these temperature effects are cooling water discharges from power plants.
Total Dissolved Solids	Dissolved solids in natural waters may consist of carbonates, bicarbonates, chlorides, sulfates, phosphates, nitrates, magnesium, sodium, iron, manganese, and other substances.
Toxicity	Toxicity is the adverse response of organisms to chemicals or physical agents.
Toxic Pollutants ³	On May 18, 2000, the U.S. Environmental Protection Agency promulgated a final rule prescribing water quality criteria for toxic pollutants in inland surface waters, enclosed bays, and estuaries in California (the California Toxics Rule [40 Code of Federal Regulations 131.38]). California Toxics Rule criteria constitute applicable water quality criteria in California. In addition to the California Toxics Rule, certain criteria for toxic pollutants in the National Toxics Rule [40 Code of Federal Regulations 131.36] constitute applicable water quality criteria in California, as well. The Shelter Island Yacht Basin portion of San Diego Bay is designated as an impaired water body for dissolved copper pursuant to Clean Water Act Section 303(d). A Total Maximum Daily Load has been adopted to address this impairment.
Trihalomethanes	Chlorine is the dominant chemical agent used to disinfect treated water and wastewater. Trihalomethanes are formed when chlorine reacts with aquatic organic material found in water and wastewater.
Turbidity	The turbidity of water is attributable to suspended and colloidal matter, the effect of which is to disturb clearness and diminish the penetration of light. By interfering with the penetration of light, turbidity can adversely affect photosynthesis which aquatic organisms depend upon for survival.

Source: RWQCB 2021.

Table 3.9-3. Surface Water Quality Objectives

Area	Constituent (mg/L or as noted)												
	TDS	Cl	SO ₄	% N	N&P	Fe	Mn	MBAS	B	Odor	Turb NTU	Color Units	F
Surface Water Quality Objectives													
Lower San Diego	1,000	400	500	60	¹	0.3	0.05	0.5	1.0	–	20	20	–
Lower San Diego (Santee)	1,000	400	500	60	¹	1.0	1.00	0.5	1.0	–	20	20	–

Source: RWQCB 2021.

Notes: B = boron; Cl = chlorine; F = fluoride; Fe = iron; HA = hydrologic area; MBAS = methylene blue activated substances; mg/L = milligrams per liter; Mn = manganese; N = nitrogen; N&P = nitrogen and phosphorus; SO₄ = sulfate; Turb NTU = turbidity (reported in nephelometric turbidity units).

¹ Concentrations of nitrogen and phosphorus, by themselves or in combination with other nutrients, shall be maintained at levels below those which stimulate algae and emergent plant growth. Threshold total phosphorus (P) concentrations shall not exceed 0.05 mg/l in any stream at the point where it enters any standing body of water, nor 0.025 mg/l in any standing body of water. A desired goal in order to prevent plant nuisances in streams and other flowing waters appears to be 0.1 mg/l total P. These values are not to be exceeded more than 10% of the time unless studies of the specific body in question clearly show that water quality objective changes are permissible and changes are approved by the Regional Board. Analogous threshold values have not been set for nitrogen compounds; however, natural ratios of nitrogen to phosphorus are to be determined by surveillance and monitoring and upheld.

Regional Water Quality Control Board Municipal Permit (Order R9-2013-0001, as Amended by Orders R9-2015-001 and R9-2015-0100)

The Municipal Stormwater Permit (Order No. R9-2013-0001), as amended by Order Nos. R9-2015-001 and R9-2015-0100, is an NPDES permit issued that requires the owners and operators of Municipal Separate Storm Sewer Systems (MS4s) within the San Diego region to implement management programs to limit discharges of pollutants and non-stormwater discharges to and from their MS4 from all phases of development. The Municipal Stormwater Permit requires the City of San Diego, the City of Santee, and other co-permittees to develop watershed-based Water Quality Improvement Plans (WQIPs). The Municipal Stormwater Permit emphasizes watershed program planning and program outcomes.

The intent of the Municipal Stormwater Permit is to enable each jurisdiction to focus its resources and efforts to accomplish the following:

- Reduce pollutants in stormwater discharges from its MS4.
- Effectively prohibit non-stormwater discharges to its MS4.
- Achieve the interim and final WQIP numeric goals.
- The proposed project would be required to comply with the Municipal Stormwater Permit requirements, as well as any specific WQIP requirements and BMPs identified by the RWQCB, City of Santee, and the City of San Diego to be implemented in compliance with the Municipal Stormwater Permit.

3.9.3.4 Local

City of Santee

General Plan

The City of Santee's *General Plan* includes various goals, objectives, and policies related to water quality and drainage and protections against flooding hazards. The *Conservation Element* (City of Santee 2003a) and *Safety Element* (City of Santee 2003b) contain the following objectives and policies that are relevant to the proposed project:

Conservation Element

The City of Santee's *General Plan– Conservation Element* articulates the City of Santee's objectives to preserve and enhance water quality and protect designated beneficial uses of all local waters, while accomplishing economic growth and land use objectives:

Objective 9.0: Reduce pollutants in urban runoff and stormwater discharges.

Policy 9.1: The City shall use careful planning and review to identify and eliminate urban runoff problems before development is approved.

Policy 9.2: The City shall enforce the implementation of appropriate best management practices (BMPs) during construction projects.

Policy 9.3: Reduce the discharge of pollutants into the storm drain system from existing municipal, industrial, and commercial facilities and residential areas to the maximum extent practicable.

Safety Element

The City of Santee's *General Plan– Safety Element* includes various goals, objectives, and policies related to public safety:

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 1.3: All proposed projects which would modify the configuration of any of the three main waterways in Santee (San Diego River and Sycamore and Forester Creeks) shall be required to submit a report prepared by a registered hydrologist that analyzes potential effects of the project downstream as well as in the local vicinity.

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.

Municipal Code

The City of Santee's primary legal authority for requiring construction projects to implement water quality control measures are set forth in Chapters 9.06, 11.40, and 12.30 of the City of Santee's Municipal Code.

Chapter 9.06, Stormwater Management and Discharge Control

The City of Santee's *Guidelines for Surface Water Pollution Prevention* supports the City of Santee's Storm Water Management and Discharge Control Ordinance (Storm Water Ordinance), codified in Chapter 9.06 of the City of Santee's Municipal Code. The *Guidelines for Surface Water Pollution Prevention* establish minimum stormwater management requirements and controls to address the highest-priority water quality condition in the WQIP for the San Diego River WMA (City of Santee 2015). The purposes of Chapter 9.06, Storm Water Ordinance, are as follows:

1. Effectively prohibiting non-stormwater discharges to the storm water conveyance system.
2. Eliminating illicit discharges and illicit connections to the storm water conveyance system.
3. Reducing the discharge of pollutants from the storm water conveyance system, to the maximum extent practicable in order to achieve applicable water quality objectives for surface waters in San Diego County.
4. Achieving compliance with Total Maximum Daily Load regulations.

The proposed project is a Priority Development Project (PDP), and therefore would be required to comply with minimum stormwater management requirements and controls identified in the City of Santee's *Guidelines for Surface Water Pollution Prevention* (City of Santee 2015).

Chapter 11.36, Flood Damage Prevention

Chapter 11.36, et seq. establishes regulatory standards to minimize the public and private losses due to flood conditions. The standards apply to all areas of special flood hazards as designated in Municipal Code Section 11.36.070. Specifically, Section 11.36.150 provides detailed standards of construction applicable to all areas of special flood hazard including types of construction materials, elevation requirements, and flood proofing design measures.

Chapter 11.40, Excavation and Grading

This chapter establishes minimum requirements for grading, excavating, and filling of land and provides water quality protection provisions. It also provides for the issuance of permits and provides for the enforcement of the chapter provisions.

Chapter 12.30, Development Impact Fees

There are several development impact fees in the City of Santee's Municipal Code. These fees impose on new development the costs of constructing public facilities, which are reasonably related to the impacts of the new development. The drainage fee, in particular, provides funds for the installation of needed drainage improvements identified in the City of Santee Citywide Drainage Study. Section 12.30.160 of the City of Santee's Municipal Code includes how fees are calculated depending on land use types. The proposed project would be required to pay the appropriate land development impact fees determined by the City of Santee during the entitlement review process and prior to any issuance of building permits.

Jurisdictional Runoff Management Program

The Jurisdictional Runoff Management Program (JRMP) is the City of Santee's approach to improving water quality in rivers, bays, lakes, and the Pacific Ocean through reducing discharges of pollutants to the stormwater-conveyance system (City of Santee 2021b), which conveys runoff from rain, irrigation runoff, natural groundwater seepage, and other sources of water directly to water bodies without treatment. As the operator of a storm drain system, the City of Santee is subject to a RWQCB-issued NPDES MS4 Permit, which requires the City of Santee to reduce pollutants in discharges from its storm drain system to water bodies. Enforcement of the JRMP helps prevent stormwater pollutants from entering into local storm drains and, ultimately, San Diego River.

To reduce pollutants in these discharges to water bodies, the City of Santee implements, or requires its residents, businesses, municipal facilities, and land owners to implement, a variety of BMPs. Some examples of BMPs include covering potential pollutant sources to prevent contact with rain, employing erosion-reduction techniques at construction sites, adjusting sprinklers to eliminate over-irrigation, sweeping streets and parking lots, and building green infrastructure-treatment controls, such as bioretention planters along streets. Table 3.9-4 provides a list of the minimum BMPs for construction sites.

Table 3.9-4. Minimum Best Management Practices for Construction Sites

BMP Category	BMP
Project Planning	<ul style="list-style-type: none"> ▪ Scheduling (EC-1)
Good Housekeeping/ Waste Management & Non-Stormwater Management	<ul style="list-style-type: none"> ▪ Water Conservation Practices (NS-1) ▪ Dewatering Operations (NS-2) ▪ Paving and Grinding Operations (NS-3) ▪ Temporary Stream Crossing (NS-4) ▪ Clear Water Diversion (NS-5) ▪ Illicit Connection/Discharge (NS-6) ▪ Potable Water/Irrigation (NS-7) ▪ Vehicle and Equipment Cleaning (NS-8) ▪ Vehicle and Equipment Fueling (NS-9) ▪ Vehicle and Equipment Maintenance (NS-10) ▪ Pile Driving Operations (NS-11) ▪ Concrete Curing (NS-12) ▪ Concrete Finishing (NS-13) ▪ Material Over Water (NS-14) ▪ Demolition Adjacent to Water (NS-15) ▪ Temporary Batch Plants (NS-16) ▪ Material delivery and storage (WM-1)

Table 3.9-4. Minimum Best Management Practices for Construction Sites

BMP Category	BMP
	<ul style="list-style-type: none"> ▪ Material Use (WM-2) ▪ Stockpile Management (WM-3) ▪ Spill Prevention and Control (WM-4) ▪ Solid Waste Management (WM-5) ▪ Hazardous Waste Management (WM-6) ▪ Contaminated Soil Management (WM-7) ▪ Concrete Waste Management (WM-8) ▪ Sanitary/Septic Waste Management (WM-9) ▪ Liquid Waste Management (WM-10)
Erosion Control	<ul style="list-style-type: none"> ▪ Scheduling (EC-1) ▪ Preservation of Existing Vegetation (EC-2) ▪ Hydraulic Mulch (EC-3) ▪ Hydroseeding (EC-4) ▪ Soil Binders (EC-5) ▪ Straw Mulches (EC-6) ▪ Geotextiles and Mats (EC-7) ▪ Wood Mulching (EC-8) ▪ Velocity Dissipation Devices (EC-10) ▪ Slope Drains (EC-11) ▪ Stream Bank Stabilization (EC-12) ▪ Compost Blankets (EC-14) ▪ Soil Preparation/Roughening (EC-15) ▪ Non-Vegetative Stabilization (EC-16)
Sediment Control	<ul style="list-style-type: none"> ▪ Wind Erosion Control (WE-1) ▪ Silt Fence (SE-1) ▪ Sediment Basin (SE-2) ▪ Sediment Trap (SE-3) ▪ Check Dams (SE-4) ▪ Fiber Rolls (SE-5) ▪ Gravel Bag Berms (SE-6) ▪ Street Sweeping and Vacuuming (SE-7) ▪ Storm Drain Inlet Protection (SE-10) ▪ Active Treatment Systems (SE-11) ▪ Manufactured Linear Sediment Controls (SE-12) ▪ Compost Socks and Berms (SE-13) ▪ Stabilized Construction Entrances (TC-1) ▪ Construction Road Stabilization (TC-2) ▪ Entrance/Outlet Tire Wash (TC-3)

Source: City of Santee 2015.

BMP = best management practice; EC = Erosion Control; NS = Non-stormwater; WM = Waste Management; WE = Wind Erosion; SE = Sediment; TC= Tracking Control

Best Management Practices Design Manual

The City of Santee adopted its BMP Design Manual (City of Santee 2016) to be used in conjunction with the City of Santee's JRMP (City of Santee 2015). The BMP Design Manual provides the City of Santee the legal authority necessary to comply with the requirements of the San Diego RWQCB's Order No. R9-2013-0001, as amended by

Order No. R9-2015-0001 (MS4 Permit). The City of Santee's BMP Design Manual identifies BMP requirements for on-site post-construction stormwater requirements for Standard Development Projects (SDPs) and PDPs, and provides updated procedures for planning, preliminary design, selection, and design of permanent stormwater BMPs based on the performance standards presented in the MS4 Permit.

The MS4 Permit requires all development projects to implement source-control and site design practices that minimize the generation of pollutants. Although all development projects are required to implement source-control and site design/low-impact-development (LID) practices, the MS4 Permit has additional requirements for development projects that exceed size thresholds and/or fit under specific use categories. These projects, referred to as PDPs, are also required to incorporate structural BMPs into the project plan to reduce the discharge of pollutants and to address potential hydromodification impacts from changes in flow and sediment supply.

The proposed project is a PDP; therefore, a SWQMP and structural treatment-control BMPs are required in conjunction with source control and site design BMPs. Although PDP projects are subject to hydromodification management requirements, this project's discharge points flow directly into the San Diego River, a section exempt from hydromodification management according to the *San Diego County Regional Watershed Management Area Analysis* (Geosyntec Consultants 2015) for the San Diego River Watershed Management Area HU 907.00, 436 square miles (San Diego River Exempt FID 13084). Therefore, this project is Hydromodification Management Plan exempt.

Flood Damage Prevention Ordinance

The City of Santee's Flood Damage Prevention Ordinance (City of Santee Municipal Code 11.36) defines special flood hazard areas within Santee and regulates work taking place within these special flood hazard areas. The intent of the Ordinance is to reduce the risks to residents and public and private improvements from flooding. The Ordinance precludes development in flood-prone floodway areas and requires all new development to be designed to be above the height of the 100-year flood (associated with the river flow rates as provided in Table 11.36.070 of the City of Santee's Flood Damage Prevention Ordinance; these flow rates are higher than FEMA flow rates). In addition, the Ordinance controls dredging, filling, or other activities that could modify the natural floodplain and prevents construction of barriers or structures that could divert flood flows and cause upstream or downstream impacts.

City of San Diego

General Plan

The City of San Diego's *General Plan* provides a number of goals and policies related to hydrology and water quality concerns in the *Public Facilities, Services, and Safety Element* (City of San Diego 2024a) and the *Conservation Element* (City of San Diego 2024b). The following summaries of each element are relevant to the proposed project:

Public Facilities, Services, and Safety Element

The City of San Diego's *General Plan – Public Facilities, Services, and Safety Element* (2024a) includes a number of goals and policies related to the provision of adequate public facilities and services for existing and proposed development. For stormwater, these involve efforts to provide appropriately designed and sized infrastructure and ensure adequate conveyance capacity, protect water quality, and provide conformance with applicable regulatory standards (such as the NPDES).

Conservation Element

The City of San Diego's *General Plan – Conservation Element* (2024b) provides a number of goals and policies related to the preservation and protection of watersheds and natural drainage features, minimizing runoff and related pollutant generation during and after construction activities, and protecting drinking water resources.

City of San Diego Municipal Code

Section 43.03

The City of San Diego is required to amend its Storm Water Management and Discharge Control Ordinance per San Diego Municipal Code Section 43.03 to conform to the requirements of the 2013 MS4 Permit Order R9-2013-0001 issued by the San Diego RWQCB. The amendments include updates to the list of non-stormwater discharges (including conditions for the discharges) allowed into the City of San Diego's storm drain system. The amended list is consistent with the list from the 2013 MS4 Permit.

The purpose of San Diego Municipal Code Section 43.03 is to restore and maintain the water quality of receiving waters and further ensure the health, safety, and general welfare of the citizens of the City of San Diego by effectively prohibiting non-stormwater discharges, including spills, dumping, and disposal of materials other than stormwater to the MS4, and by reducing pollutants in discharges from the MS4 to receiving waters to the maximum extent practicable, in a manner pursuant to and consistent with the federal Water Pollution Control Act (33 USC 1251 et seq.) and the MS4 Permit.

Section 145.3602

The purpose of San Diego Municipal Code Section 145.3602 is to reduce risk associated with flood hazard areas. Unless the applicant has submitted an engineering analysis, prepared in accordance with standard engineering practice by a civil engineer, that demonstrates that the proposed work would not result in any increase to the level of the base flood elevation of the floodway, grading, excavation, and earthwork construction, including fills and embankments, the proposed work would not be permitted in special flood hazard areas established in Section 145.1612 or Section 149.0322 of the San Diego Municipal Code, nor in special flood hazard areas where base flood elevations are specified, but floodways have not been designated.

San Diego River Watershed Management Area Water Quality Improvement Plan

The MS4 Permit requires development of WQIPs that guide the co-permittees' JRMPs toward achieving improved water quality in MS4 discharges and receiving waters. Caltrans, the County of San Diego, and the Cities of El Cajon, La Mesa, San Diego, and Santee developed a San Diego River WQIP, which is a requirement of updated stormwater regulations that the RWQCB adopted, according to Order No. R9-2013-0001, as amended by Order Nos. R9 2015-0001 and R9-2015-0100. The ultimate goal of the WQIP is to protect, preserve, enhance, and restore water quality of receiving water bodies (Project Clean Water 2023). The WQIP assesses the impacts of storm drain discharges on receiving water quality and identifies a list of priority water quality conditions for the watershed. The highest-priority water quality condition identified for the San Diego River Watershed is bacteria, in both dry- and wet-weather conditions. Other priority water quality conditions include nitrogen, phosphorus, TDS, eutrophic conditions, and an index of biological integrity in dry-weather conditions. Implementation of the WQIP furthers the CWA's objectives to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The

requirement sets forth a collaborative and adaptive planning and management process that identifies high-priority water quality conditions within a WMA and implements strategies through the JRMPs of the respective jurisdictions.

General Waste Discharge Requirements For Groundwater Extractions Discharges (Order No. R9-2015-0013)

Order No. R9-2015-0013 is intended to cover temporary discharges of groundwater extraction wastes from groundwater extracted for construction and other groundwater extraction activities. Dischargers must meet the applicable criteria listed in the permit to be subject to waste discharge requirements under this permit. Receiving-water limitations are based on water quality objectives contained in the Basin Plan and are a required part of the permit. The discharge of groundwater extraction waste from any site must not, separately or jointly with any other discharge, cause violations of certain water quality objectives identified in the Basin Plan.

The proposed project would be required to comply with Order No. R9-2015-0013 requirements if dewatering were required during construction.

City of San Diego Jurisdictional Runoff Management Program

Under the Municipal Stormwater Permit, each jurisdiction is to prepare a JRMP, which includes a component that addresses issues related to construction activities and a component that addresses issues related to existing development. Additionally, each co-permittee prepares and submits an annual report that describes the implementation of programs and strategies to reduce the discharge of pollutants of concern to the MS4 and receiving waters to the maximum extent practicable.

The JRMP is the City of San Diego's approach to improving water quality in its rivers, bays, lakes, and ocean through reducing discharges of pollutants to the MS4 (City of San Diego 2025). As the operator of an MS4, the City of San Diego is subject to an NPDES Municipal Permit issued by the San Diego RWQCB. The permit requires the City of San Diego to reduce pollutants in discharges from its storm drain system to water bodies. The City of San Diego's MS4 conveys most runoff from rain, irrigation runoff, natural groundwater seepage, and other sources of water to water bodies without first being directed to a treatment plant. To reduce pollutants in these storm drain system discharges to water bodies, the City of San Diego implements or requires its residents and land owners to implement BMPs for residential, industrial, commercial, and municipal sites/sources. Some examples of BMPs include covering potential pollutant sources to prevent contact with rain, employing erosion-reduction techniques at construction sites, adjusting sprinklers to eliminate irrigation runoff, sweeping streets and parking lots, and building green-infrastructure techniques, such as planters that capture and treat runoff along streets.

The golf course modification component of the proposed project that falls within the City of San Diego's jurisdiction is considered an SDP; therefore, the proposed project would not be required to follow all specific actions or BMPs set forth in the JRMP.

City of San Diego Storm Water Runoff Control and Drainage Regulations

The City of San Diego's Storm Water Runoff Control and Drainage Regulations are enforced through issuance of permits for projects under its jurisdictional control. The City of San Diego's *Stormwater Standards Manual* (City of San Diego 2021) is intended to help a project applicant, in coordination with City of San Diego stormwater program staff, develop a Stormwater Management Plan for a development project (public or private) that complies with local and MS4 Permit requirements.

3.9.4 Project Impact Analysis

3.9.4.1 Methodology

The project site is located on approximately 165 acres, and the project would include the following components: (1) the demolition of the existing Carlton Oaks Golf Course; (2) redesign of the golf course; (3) reconstruction of the clubhouse with a new pro shop, practice area, and learning center structure; (4) a hotel and associated cottages; (5) residential accessory uses consisting of two residential neighborhoods with open space areas; and (6) related on-site infrastructure. Approximately 100.6 acres of the project site is within the City of Santee, and approximately 64.2 acres is within the City of San Diego, for a total site of approximately 165 acres. Additionally, approximately 3.4 acres consist of areas outside of the project site that would be developed with improvements associated with the project and are located either in the City of San Diego or City of Santee (off-site improvement areas). The off-site improvement areas and the project site make up the CEQA Study Area, which is approximately 169 acres. The golf course, the proposed hotel, country club amenities, and residential development are proposed to be located within the City of Santee. In the City of San Diego, land uses would include a 64-acre portion of the redesigned golf course; access to the proposed Residential West subdivision from West Hills Parkway, including relinquished abutters access rights and revestment of access rights; and the widening and restriping of West Hills Parkway.

The following section evaluates the effects on existing hydrology and water quality conditions (as described above) should the proposed project be implemented. Based on the existing conditions, the analysis assesses the direct and indirect impacts related to hydrology and water quality using the thresholds presented below.

Impacts were analyzed qualitatively based on professional judgment in light of the project design and based on information from the Drainage Reports, the SWQMP, and the Preliminary Flood Study (i.e., the CLOMR) prepared for the proposed project. These technical reports are included as Appendices J1, J2, K, and L of this Draft EIR. The Preliminary Flood Study proposed revisions to FEMA floodplain, a portion of the floodway delineation, and base flood elevations. Changes and revisions comply with FEMA regulations and ordinances. Approval of the CLOMR would result in remapping of the affected floodplain. Flood model scenarios and parameters are detailed in Appendix L.

The analysis focused on issues related to surface and groundwater quality, erosion or siltation, runoff, and flood hazards. The key construction-related impacts were identified and evaluated qualitatively based on the physical characteristics of the project site and the magnitude, intensity, location, and duration of anticipated construction activities. The surface water-hydrology impact analysis considers changes in stormwater volumes and capacity, creation of new impervious surfaces, flood hazards, implementation of MS4 Permit stormwater pollutant-control requirements, and potential impacts on water quality. Impacts of the proposed project on surface water quality were analyzed using available information on potential existing sources of pollution and current water quality conditions in the project area. These conditions were then compared to potential project-related sources of pollution during construction (e.g., sediments and other construction materials) and operation (e.g., operations and maintenance [O&M] activities, trash, other pollutants generated from the project components). The proposed project was analyzed for potential impacts on beneficial uses and water quality objectives (i.e., pollutants of concern) of San Diego River and receiving waters. Receiving and nearby waters with CWA Section 303(d)-impaired water quality were identified, along with the impairment (i.e., pollutant/stressor) and an evaluation of whether the impairment has the potential to be further affected by the proposed project.

Project Design Features

The project proponent would implement the following project design features (PDFs) to reduce hydrology and water quality impacts (the full text of these PDFs can be found in Chapter 2, Project Description):

PDF-13: Stormwater Pollution Prevention Plan (SWPPP)

PDF-14: Stormwater Quality Management Plan (SWQMP)

PDF-15: Scour and Erosion Prevention Measures

3.9.4.2 Thresholds of Significance

The following significance criteria are based on State CEQA Guidelines Appendix G and provide the basis for determining the significance of impacts associated with hydrology and water quality resulting from implementation of the proposed project.

Impacts would be considered significant if the proposed project were to result in any of the following:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3. 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 cause the following:
 - a. Result in substantial erosion or siltation on or off site.
 - b. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site.
 - c. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
 - d. Impede or redirect flood flows.
4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.9.5 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the proposed project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Impact Discussion

Surface Water

Construction

Construction activities associated with the proposed project, such as demolition, grading, excavation, filling, compaction, and construction of aboveground facilities and buildings, could temporarily degrade water quality by increasing polluted stormwater runoff. In the event of heavy rain or wind conditions during excavation or other ground-disturbing activities, erosion and sediment transport from the project site could increase. The total graded area would be 116.3 acres and would require approximately 279,020 cubic yards (CY) of import, 258,244 CY of raw cut, and 512,445 CY of raw fill. Stormwater runoff (or wind) could carry the exposed or eroded sediments to the storm drain system or directly into San Diego River. Erosion and sedimentation affect water quality through interference 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 to San Diego River, which could contribute to water quality degradation. As such, construction activities could temporarily violate water quality standards or waste discharge, and impacts would be potentially significant.

In addition to potential pollutant contributions from disturbed soil areas, the delivery, handling, and storage of construction materials and wastes, as well as the use of construction equipment, could introduce a risk for stormwater contamination that could affect water quality. Spills or leaks from heavy equipment and machinery can result in oil and grease contamination. Some hydrocarbon-compound pollution associated with oil and grease can be toxic to aquatic organisms at low concentrations. On-site staging areas or building sites can also be the source of pollution from the use of paints, solvents, cleaning agents, and metals during construction. Materials from soil excavation could contain hazardous materials that may be exposed to stormwater. Larger pollutants, such as trash, debris, and organic matter, are also associated with construction activities. Furthermore, concrete used for structures, footings, and other paving materials could be potential sources of water quality pollution if any of these materials were spilled or deposited on unprotected surfaces. Other potential effects include health hazards and aquatic-ecosystem damage associated with introduction of bacteria, viruses, and vectors if waste management were not adequately implemented. As such, construction activities could violate water quality standards or waste discharge requirements, and impacts would be potentially significant.

The proposed project would disturb 142.74 acres of land (Appendix K). Therefore, compliance with the Construction General Permit would require development and implementation of an SWPPP that identifies construction BMPs to protect stormwater runoff and includes a monitoring plan for measuring BMP effectiveness. Each co-permittee must require and confirm that prior to occupancy and/or intended use of any portion of a PDP, each structural BMP is inspected to verify that it has been constructed and is operating in compliance with all of its specifications, plans, permits, and ordinances and the requirements of the MS4 Permit. Preparation of a SWPPP is also a project design feature (PDF) (refer to PDF-13, SWPPP, in Section 2.4.6, Project Design Features, in Chapter 2, Project Description).

As required, a variety of construction BMPs would be implemented throughout the various construction phases in order to protect water quality (Table 3.9-4). At a minimum, BMPs would include practices to minimize the

contact of construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) with stormwater. The construction SWPPP would specify properly designed, centralized storage areas that keep these materials out of the rain. When grading would be conducted during the rainy season, the primary BMPs selected would focus on erosion control (i.e., keeping sediment in place) and then on sediment control (i.e., keeping sediment on site). Measures would include a range of stormwater control BMPs, such as installing erosion control (e.g., silt fences, staked fiber rolls, geofabric) to prevent silt runoff to storm drains or waterways. Topsoil and backfill would be stockpiled, protected, and replaced at the conclusion of construction activities. Disturbed soil would be revegetated as soon as possible with the appropriate selection and schedule for turf, plants, and other landscaping vegetation.

In addition to the SWPPP, the project proponent would be required to implement the construction BMPs identified in the City of Santee's JRMP and the City of San Diego's JRMP. The SWPPP would specify construction BMPs to ensure that water quality standards or waste discharge requirements were not violated. BMPs selected would be designed to comply with the requirements of the JRMPs and the Construction General Permit and would be subject to review and approval by the Cities of Santee and San Diego. Construction-related measures would include BMPs from the following categories, as listed in Table 3.9-4:

- Project Planning
- Good Housekeeping/Waste Management
- Non-Stormwater Management
- Erosion Control
- Sediment Control
- Wind Erosion Control

Aside from the above categories of BMPs, per City of Santee Municipal Code Section 11.40.515, grading and paving are not permitted during the rainy season (i.e., October 1–April 1) on any site when the City of Santee Engineer determines that erosion, mudflow, or sediment discharge from grading may adversely affect downstream properties, drainage courses, storm drains, streets, easements, or public or private facilities or improvements. Such measures are routinely developed for construction sites and are proven to be effective in reducing pollutant discharges from construction activities.

Implementation of the SWPPP during construction would minimize the potential for water quality objectives, standards, and wastewater-discharge thresholds to be violated. The SWPPP would be prepared and approved by the Cities of Santee and San Diego prior to commencement of construction activities. With implementation of the SWPPP (refer to PDF-13, SWPPP, in Chapter 2), the applicable City of Santee stormwater requirements, local grading ordinances, and other related regulatory requirements, temporary impacts from construction and project-related waste on water quality would be less than significant. With implementation of construction BMPs, as required by the Construction General Permit, the City of Santee's JRMP, and the City of San Diego's JRMP, the proposed project's potential to affect water quality would be reduced. Compliance with existing regulatory requirements, such as implementation of erosion and sediment control, non-stormwater management, and waste management construction BMPs, as required by the Construction General Permit, would reduce impacts of the proposed project in regard to violation of a water quality standard, waste discharge requirement, or otherwise substantially degrade water quality to less-than-significant levels.

Operation

The proposed project's impervious area would total 30.71 acres, and the pervious areas would total 112.03 acres (Appendix K). Figure 2-3, Proposed Site Plan, in Chapter 2, Project Description, identifies which portions of the proposed project fall within the City of Santee's jurisdiction and which fall within the City of San Diego's jurisdiction. The proposed project would develop residential uses within undeveloped parcels, which would increase the impervious surfaces on the project site. Commercial uses, such as the proposed Carlton Oaks Clubhouse and Resort Hotel, would generate pollutants that could impair water quality if not treated prior to discharge. Typical pollutants associated with commercial land uses include, but are not limited to, suspended solids, pathogens, nutrients, pesticides, organic compounds, metals, trash/debris, oxygen-demanding substances, and oil and grease. Typical pollutants associated with parking include heavy metals; however, the existing project site currently includes a parking lot, as well as a country club facility and hotel.

Under the proposed project, the hotel, restaurant, retail, and visitor-serving recreational uses would be developed. The redeveloped commercial uses could increase the amount of pollutants generated on site that could run off during a storm event. Bacteria have been identified as the highest-priority water quality condition within the San Diego River WMA, and the proposed project would potentially exacerbate existing conditions. The addition of residential uses would also generate pollutants that could impair water quality if not treated prior to discharge.

Pursuant to the City of Santee's JRMP, post-construction BMPs are required for all PDP projects falling under the state's Construction General Permit. Post-construction BMPs are a subset of BMPs that include structural and nonstructural controls that detain, retain, filter, or educate to prevent the release of pollutants to surface waters during the functional life of developments. The proposed project would be considered a PDP and required to implement pollutant-control BMPs, as described in the City of Santee's *BMP Design Manual* (City of Santee 2016). Stormwater pollutant-control BMPs are engineered facilities that are designed to retain, biofilter, and/or provide flow-through treatment of stormwater runoff generated on the project site. Minimum BMPs consistent with the City of Santee's *BMP Design Manual* require the use of site-design BMPs and source- and pollutant-control BMPs. The JRMP requires commercial and industrial businesses to implement and maintain BMPs to prevent pollutants from entering the stormwater-conveyance system. The minimum required BMPs prohibit irrigation runoff, which can transport bacteria, and require sediment and erosion control to reduce potential for mobilization of soil particles and bacteria associated with sediment. The proposed project would be required to implement BMPs identified in the City of Santee's JRMP, following the City of Santee's *BMP Design Manual*. Additionally, a post-construction SWQMP must be prepared for all PDPs to identify the project-specific design BMPs and source- and pollutant-control BMPs. These requirements are discussed under Section 3.9.3, Applicable Laws and Regulations, and primarily under Section 3.9.3.4, Local. Implementation of pollutant-control BMPs and a SWQMP are project design features (PDF-13, SWPPP, and PDF-14, SWQMP; refer to Chapter 2), which would reduce pollutant and stormwater discharges and associated impacts.

The project components that fall within the City of San Diego's jurisdiction would be required to implement site design-performance standards and BMPs identified in the City of San Diego's JRMP, following the City of San Diego's *Stormwater Standards Manual* (City of San Diego 2021). The proposed project is an SDP; therefore, the Public Utilities Department is responsible for verifying that adequate site-design and source-control BMPs are included in the construction documentation in accordance with the *Storm Water Standards Manual*. Site design performance standards define minimum requirements for how a site must incorporate LID BMPs, including the location of BMPs and the use of integrated site design practices, as applicable. Every private project is required to fill out the City of San Diego's Stormwater Requirements Applicability Checklist (Form DS-560) to determine if the project is a PDP, SDP, or Exempt and which requirements apply. In the case of an SDP, the assigned reviewer checks

the submitted construction documents to ensure that the project meets the minimum site design and source control BMP requirements set forth for all development projects in the *Storm Water Standards Manual*.

A project-specific SWQMP has been prepared for approval by the City of Santee that identifies site-design and source- and pollutant-control BMPs to reduce the discharge of pollutants to the maximum extent practicable (PDF-14, SWQMP; refer to Chapter 2). As identified in the project-specific SWQMP (Appendix K), the proposed project would be required to implement source-control BMPs, where applicable and feasible. These source-control (SC) measures include the following:

- Prevent illicit discharges into the MS4 (SC-1).
- Install storm drain stenciling or signage (SC-2).
- Protect outdoor materials-storage areas from rainfall, run-on, runoff, and wind dispersal (SC-3).
- Protect materials stored in outdoor work areas from rainfall, run-on, runoff, and wind dispersal (SC-4).
- Protect trash storage areas from rainfall, run-on, runoff, and wind dispersal (SC-5).
- Additional BMPs (SC-6) based on potential sources of runoff pollutants, including on-site storm drain inlets, interior floor drains and elevator-shaft sump pumps, landscape/outdoor pesticide use, pools, spas, ponds, decorative fountains and other water features, food service, refuse areas, outdoor storage of equipment or materials, vehicle and equipment cleaning, vehicle/equipment repair and maintenance, fuel-dispensing areas, fire sprinkler-test water, miscellaneous drain or wash water, and plazas, sidewalks, and parking lots.

In addition, as identified in the project-specific SWQMP, the proposed project would implement site-design (SD) BMPs, where applicable and feasible. These site-design BMPs include the following:

- Maintain natural drainage pathways and hydrologic features (SD-1)
- Conserve natural areas, soils, and vegetation (SD-2)
- Minimize impervious area (SD-3)
- Minimize soil compaction (SD-4)
- Impervious area dispersion (SD-5)
- Landscape with native or drought-tolerant species (SD-7)

In addition, the proposed trail segments through the project site would include a mix of surface treatments consisting of decomposed granite and enhanced paving, which would allow natural infiltration of stormwater. To provide source control of stormwater, limit stormwater transport and pollutant conveyance to the collection system, and restore predevelopment hydrology to the extent possible, trees are proposed for both sides of West Hills Parkway as documented in the Green Street PDP Exempt SWQMP for the project's public improvements in the City of San Diego.

The proposed project would also be required to implement structural BMPs for stormwater pollutant control. The project site was divided into eight drainage-management areas (DMAs). To treat stormwater, runoff from the site development would be directed to modular wetland systems (proprietary biofiltration BMPs) or street trees. All discharge locations discharge directly to the San Diego River (North and South Channels), which is exempt from hydromodification management requirements. Each biofiltration system would be sized to provide treatment for its respective DMA. Infiltration devices and biofiltration systems typically treat total suspended solids, nutrients, pesticides, particulate matter, particulate metals, dissolved metals, pathogens, bacteria, litter/trash, biochemical

oxygen demand, turbidity, and temperature (Caltrans 2019). Site-design BMPs (impervious area dispersion) would be implemented to meet the minimum volume retention requirement for each DMA.

Applicable site-design BMPs and source- and pollutant-control BMPs would be implemented in accordance with the City of Santee's JRMP, the City of San Diego's JRMP, and as identified in the project-specific SWQMP, which documents and identifies the following:

- All permanent source-control and site-design BMPs have been considered for the project and implemented where feasible.
- The planning process and the decisions that led to the selection of structural BMPs.
- The calculations for the design of structural BMPs to demonstrate that applicable performance standards are met by the structural BMP design.
- O&M requirements of the selected structural BMPs.
- The maintenance mechanism for long-term O&M of structural BMPs.

Project-specific SWQMPs must be provided, depending on the project component's jurisdiction, with the first submittal of project drawings for review and approval by the City of Santee or the City of San Diego. Although undeveloped parcels would be developed under the proposed project, resulting in an increase of impervious surface area, the increase would be offset by redevelopment requirements. Implementation of BMPs would improve retention on site, compared to existing conditions. Compliance with additional treatment BMPs would reduce pollutant impacts. Therefore, with implementation of these requirements, the proposed project would not violate any water quality standards or waste discharge requirements, and, as such, impacts would be less than significant. With the various project design features identified above, no mitigation measures are required.

Groundwater

Construction

During on-site grading and building construction of on-site and off-site improvements, hazardous materials (e.g., fuels, paints, solvents, concrete additives) could be used and would require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for the release of hazardous materials into the groundwater. However, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would effectively reduce the potential for the construction of the proposed project to release contaminants into groundwater that could result in groundwater contamination or cause the violation of regulatory water quality standards. Therefore, proposed project construction would not result in any substantial increase in groundwater contamination through hazardous materials releases, and impacts would be less than significant.

In the event that groundwater dewatering is required, the proposed project would comply with dewatering requirements imposed by the San Diego RWQCB's general waste discharge requirements for discharges from temporary groundwater extraction and similar waste discharges to San Diego River (Order No. R9-2015-0013). To obtain coverage under this order, a discharger must submit a complete Notice of Intent application package to the San Diego RWQCB office at least 60 days before proposed commencement of the discharge. The project proponents would be required to maintain compliance with the effluent limitations applicable to the receiving water, as specified in Order No. R9-2015-0013 (refer to Table 5 of the Order). For example, the permit has effluent limitations for settleable solids, total suspended solids, turbidity, pH, and a number of additional

parameters. In addition, Order No. R9-2015-0013 identifies the monitoring and reporting program requirements. The purpose of the monitoring and reporting program is to determine and ensure compliance with effluent limitations and other requirements established in the Order, assess treatment efficiency, characterize effluents, and characterize the receiving water and the effects of the discharge on the receiving water. The San Diego RWQCB may specify increased monitoring requirements as necessary to ensure that applicable water quality objectives are maintained in the receiving water. Any dewatering or construction-related non-stormwater discharges would be controlled in compliance with the San Diego RWQCB permit for dewatering. The permit requires permittees to conduct monitoring of dewatering discharges and adhere to effluent and receiving-water limitations contained within the permit so that water quality of surface waters is protected. Compliance with the applicable dewatering permit would further ensure that any impacts resulting from these discharges during construction of on-site and off-site improvements would be less than significant.

Operation

Groundwater would not be extracted from the project site to support operations, nor are on-site activities anticipated to result in the infiltration of pollutants that could impair the groundwater basin. As detailed above, the Cities of San Diego and Santee's JRMPs include specific requirements for all development and redevelopment activities. Applicable site-design BMPs and source- and pollutant-control BMPs would be implemented in accordance with the City of Santee's JRMP and the City of San Diego's JRMP, and identified in the project-specific SWQMP, to reduce the discharge of pollutants to the maximum extent practicable. Therefore, the proposed project including the off-site improvements are not anticipated to result in groundwater quality impacts during operation.

Impact Determination

The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would implementation of the proposed project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact Discussion

Once the golf course is redesigned and back in operation, turf irrigation would continue to be provided via the four existing wells on site. The golf course redesign includes reshaping of irrigation ponds which are filled with water from the wells. Water is then pumped from the ponds as needed to irrigate the golf course, similar to existing conditions. The redesigned golf course would reduce the areas to be irrigated and would utilize a new, modern, efficient irrigation system. Approximately 66 acres of turf would need to be irrigated, compared to 132 acres of turf that are currently irrigated. This reduction results in a 50% decrease of irrigated areas and a 61% decrease in irrigation water needed for the golf course.

The wells are located adjacent to the San Diego River and shallow groundwater is present at approximately 3 to 10 feet below the ground surface. Static water levels were measured at the time of construction in Well 2 at a depth of 60 ft bls in 1996 and Well 3 at a depth of 72 ft bls in 2012. No static water level was reported at Well 4, and no static water level data was found for Well 1. Static water level is a representative measurement of water levels during undisturbed/non-pumping conditions. The static water levels for the four golf course irrigation wells most likely represent the hydraulic head of the deeper fractured bedrock under confined conditions. Pumping of the wells will not likely influence the shallow water table due to the 110 to 116 feet of cement surface seal installed at each of these wells to seal off hydraulic connection to the alluvium and isolate the water level response from pumping to the deep fractured rock aquifer. There is little to no influence of pumping from these wells on shallow groundwater and/or surface water in the San Diego River.

Primary recharge of the San Diego River Valley Groundwater Basin (DWR No. 9-015), where the project is located, is derived from dam releases and underflow past the dams. Other sources of recharge include stream runoff from the San Diego River and San Vicente Creek, stream-flow from Forester Creek and other smaller creeks, precipitation falling on the valley floor, and discharges from municipal wastewater-treatment plants.

Although the proposed project would increase the amount of existing impervious surface that would potentially affect groundwater recharge, it would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The proposed project would include implementation of infiltration devices and biofiltration systems, which would result in some recharge during operations. Project BMPs would infiltrate and capture runoff such that an increase in impervious surfaces would not substantially change existing conditions. In addition, groundwater pumping from the existing on-site wells for turf irrigation would be reduced by 61% compared to existing conditions after the golf course is redeveloped. Thus, groundwater supplies should increase under proposed conditions.

Furthermore, the golf course would retain more than 15 acres of existing natural areas on the site, which would remain untouched throughout construction. Areas around the golf course would be planted with native grasses and smaller shrubs, allowing for groundwater to infiltrate the soil. As such, groundwater recharge would not be reduced by the proposed project. Impacts related to substantial decreases of groundwater supplies and recharge would be less than significant. Therefore, the proposed project would not interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Impact Determination

Implementation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: Would implementation of the proposed 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 that 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 that 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?

Impact Discussion

(i) Result in substantial erosion or siltation on or off site?

The proposed project would involve construction of a mixed-use resort that includes the redevelopment of the golf course and country club facility and the construction of a new resort facility with accessory residential uses. As a result, the amount of impervious surfaces would increase. However, the proposed project would not substantially alter the existing drainage patterns. Modifications to the floodplain and floodway as part of redevelopment efforts would be conducted in compliance with requirements from both cities and FEMA. Discharge points would be controlled and equipped using energy dissipation devices to manage flows and reduce velocity to non-erosive level. As a result, these changes are not expected to cause substantial erosion or sediment deposition, either on site or off site.

Landscape design would include LID drainage features, such as dispersion areas within the residential development areas, decomposed granite (DG) trails within the golf course area, and street trees on both sides of West Hills Parkway, as well as landscaped areas, such as slopes along street frontage, the golf course, and manufactured slopes. In addition, the project would implement proprietary biofiltration BMPs (Structural BMPs) to treat stormwater by removing pollutants as close as possible to its source which improves water quality and reduce runoff volume. The redesigned golf course would reduce the areas to be irrigated and would utilize a new, modern, efficient irrigation system. Approximately 66 acres of turf would need to be irrigated, compared to 132 acres of turf that are currently irrigated. This reduction results in a 50% decrease of irrigated areas and a 61% decrease in irrigation water needed for the golf course. As such, erosion associated with irrigation would be reduced.

The proposed golf course would reshape the manufactured ponds on the existing golf course. The existing drainage patterns and facilities would be updated within the golf course to improve the flow of drainage, which would reduce the amount of ponding that occurs on the site during rain events (Appendix J1).

The proposed project includes two public storm drain extensions, specifically the off-site existing 72-inch and 42-inch storm drainpipes designed to bypass the proposed residential development, along with three additional extensions that would discharge through the golf course. The existing 72-inch-diameter storm drainpipe discharges onto the site from a headwall located just off site at the northern property boundary of Residential West. This headwall would be equipped with a large concrete energy dissipator, and is positioned within an existing public easement, under the jurisdiction of the City of Santee. Under the proposed conditions, off-site flows will be conveyed on site by a proposed bypass storm drain system. This system runs parallel to the on-site storm drain, and discharges directly into the San Diego River. Discharge into the river would be managed through an adequate rock energy dissipator situated within a proposed artificial pond as part of the golf course. These features would reduce stormwater runoff to a non-erosive velocity, thereby preventing erosion and siltation.

Furthermore, the existing 42-inch storm drain discharges onto the site from a headwall situated approximately 15 feet off site, within a public easement managed by the City of Santee. The off-site flows will be captured on site by

proposed storm drain improvements. These improvements, running along the western boundary of Residential North, would extend to facilitate direct discharge into the San Diego River (North Channel). The existing storm drains that discharge into the golf course include an 18-inch public storm drain and a 47-inch by 71-inch storm drain. These drains discharge onto the site from an off-site headwall. The project proposes on-site storm drain improvements to capture the off-site flows and directly discharge them into the San Diego River. Additionally, an existing 27-inch storm drain extends onto the project site. This pipe would be extended under the proposed access road to a new headwall, where it would discharge onto the golf course. Rock riprap energy dissipators would be installed as a part of all storm drain outlets to reduce the rate of storm runoff velocity to a non-erosive level and prevent erosion and siltation (PDF-15, Scour and Erosion Prevention Measures; refer to Chapter 2). The discharge locations may be minimally constrained by backwater effects associated with San Diego River (Appendix J1).

The proposed project would also implement measures (PDF-15, Scour and Erosion Prevention Measures; refer to Chapter 2) to prevent potential scour and erosion to the proposed slopes adjacent to the floodway and the floodplain by utilizing the latest proprietary technology in slope surface stabilization and slope reinforcement such as a geotextile turf reinforcement mats that bind to the soil. Geotechnical soil reinforcement would also be used to ensure that high-flow velocities would not erode or damage the proposed development embankment (Appendix L).

The proposed project would connect to existing drainage pipes and convey drainage through the project site. The improvements with the design features described above would maintain existing flow and drainage patterns. Therefore, the proposed project does not include changes to the existing storm drain system that would result in substantial erosion or siltation on or off site. With the implementation of the project design features described above, impacts would be less than significant, and no mitigation measures would be required.

(ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site?

The proposed project would result in 30.71 acres of impervious surfaces (Appendix K); any increases in peak flows for storm events would be managed through PDFs including LID and stormwater pollutant-control BMPs designed to treat, biofilter and retain (i.e., intercept, store, infiltrate, and evaporate) stormwater runoff generated on the project site. The existing drainage conveyance is both natural and urban. The conveyance is natural through San Diego River (North and South Channels). Two existing storm drain discharge locations through San Diego River (North Channel), one in Residential West and another in Residential North, currently discharge overland into the existing golf course, and then into San Diego River (North Channel). The existing hotel, clubhouse, and parking lot convey drainage in an urban manner. All on-site drainage flows to the existing golf course, which flows to San Diego River at a multitude of discharge locations.

The proposed project would not increase flooding impacts on adjacent areas or upstream of Carlton Oaks Bridge and would not adversely affect the hydraulic conveyance of San Diego River (North and South Channels) or Sycamore Canyon Creek due to the substantial lag between the time the peak flows from the proposed development outlet to the San Diego River, and time the peak flows along the San Diego River reach the proposed outlet locations.

The existing drainage patterns and facilities would be updated within the golf course to improve the flow of drainage, an improvement that would reduce the amount of ponding that occurs on the site during rain events. Improvements would be made to connect these drainage channels and convey drainage through the project site. The existing 27-inch storm drain would be extended under the proposed vehicle-access road to a new headwall and discharge onto the golf course. Off-site flows would be picked up on site by proposed storm drain improvements and discharged either into San Diego River (North Channel) or the golf course. All improvements would be performed in a way to

maintain the existing flow and drainage patterns. Overflow structures for the biofiltration basins would connect to storm drain pipes and also discharge to San Diego River. Under the proposed project, the existing storm drains would be extended to a new energy dissipater, which would discharge directly to San Diego River. Energy dissipation would be provided at all discharge locations. Post-development site drainage would be directed on site via overland flow, surface swales, curbs, gutters, and/or the private storm drain systems to modular wetland biofiltration basins. The proposed storm drain systems would be designed to handle 100-year storm events.

Modeling results concluded that the proposed project would have no impact on the upstream water surface elevation (Appendix L). The proposed project would be designed to be consistent with City of Santee, City of San Diego, and FEMA requirements, which would avoid on-site hazards, minimize risk levels, protect public safety, and have no adverse flooding impacts on adjacent properties. Furthermore, the public drainage system would be designed in accordance with the City of Santee's drainage requirements. Storm drains would be designed to convey 100-year storm event runoff, and flow depths in street gutters would not exceed the top of the curb. The proposed storm drain systems are designed to intercept and convey the 100-year peak flows for the project.

Grading would be performed throughout the golf course as part of its redevelopment, as well as for new roads, building pads, and the access road. Fill would be placed to raise the two residential development areas out of the floodplain and the clubhouse and resort area above the 100-year flood levels of the floodway and in compliance with *General Plan* requirements. To offset for fill placed in the residential and resort areas, grades in a portion of the existing golf course would be lowered. The golf course would be regraded to enhance flows around the proposed residential and resort development areas. The floodway and floodplain is proposed to be remapped to exclude the proposed development site. Both residential areas would continue to remain out of the floodway, consistently with current FEMA mapping. Therefore, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site. As such, impacts would be less than significant, and no mitigation measures would be required.

(iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater-drainage systems or provide substantial additional sources of polluted runoff?

Project construction activities such as grading and use of construction equipment could result in temporary impacts associated with transport of sediment or pollutants to adjacent properties, roadways, or watercourses via stormwater. Implementation of the SWPPP during construction would minimize the potential for adverse effects on water quality and excess stormwater flows. BMPs in the SWPPP would also include a range of stormwater control measures to prevent stormwater flows from exceeding the capacity of the drainage system. Anticipated pollutants of concern expected from operation of the proposed project would be typical of residential uses, roads, parking areas, and landscaping. Such pollutants include trash and debris from site visitors and around garbage bins, oil and grease from equipment and vehicles, oxygen-demanding substances, heavy metals from equipment and structures, organic compounds, pesticides, and nutrients from landscape. The proposed project would include implementation of proprietary biofiltration systems that would treat the identified pollutants. Due to the soil type and seasonal high groundwater, infiltration of runoff is limited. All of the project sites drainages discharge into San Diego River (Appendix J1). The existing drainage patterns and facilities would be updated within the golf course to improve the flow of drainage, which would reduce the amount of ponding that occurs on the site during rain events. In addition, the existing stream that flows through the golf course would maintain its existing flow capacities. The proposed shape and location of the hotel site has been intentionally designed to avoid disruption to the flow of San Diego River, maintain the existing river flow capacity, and allow flow to the south. The proposed resort area is located upstream of the Forester Creek and San Diego River confluence, avoiding a section of the river that increases in flow volume (Appendix L).

Runoff from site development would be directed to modular wetland systems for treatment. Multiple private inlets, gutters, storm drain systems, and treatment basins would reduce the overland flow distance and provide treatment prior to discharge into the public storm drain and San Diego River. A portion of the treated runoff would be directed, where feasible, to the water features on the golf course. Overflow structures for the biofiltration BMPs would connect to storm drain pipes and would also discharge to San Diego River. The proposed project would not substantially increase the rate or amount of surface runoff. Due to the substantial lag time between the time the peak flows from the proposed development outlet to the San Diego River, and time the peak flows along the San Diego River reach the proposed outlet locations; there is no net increase of flows to the San Diego River from the development of Carlton Oaks Country Club and Resort when compared to existing conditions. Furthermore, runoff would not exceed the capacity of the existing storm drain system, and the public storm drain system has enough capacity to convey any additional flows from the site. Prior to discharge into the public storm drain, runoff would be treated (Appendix J1).

The proposed project is considered a PDP in accordance with the Cities of Santee and San Diego's JRMPs. As a PDP, the proposed project would be required to implement post-construction BMPs through the preparation and implementation of the SWQMP prepared for the proposed project (Appendix K). The proposed project would implement site-design BMPs and source- and pollutant-control BMPs consistently with both Cities' JRMPs and BMP Design Manuals, as described previously under Section 3.9.3.4, Local. The JRMPs require that PDP applicants proposing to meet the on-site performance standards implement all feasible on-site retention BMPs needed to meet the stormwater pollutant-control BMP requirements prior to installing on-site biofiltration BMPs, and then install on-site flow-through treatment control BMPs. Structural BMPs are measures that provide retention (i.e., intercept, store, infiltrate, and evaporate) of stormwater as part of the pollutant-control strategy.

Site-design and source-control BMPs are the minimum management practices, control techniques, and design and engineering methods to be included in the planning design to reduce the discharge of pollutants from the development and are intended to avoid or minimize the water quality impacts by managing site hydrology, providing treatment features integrated within the site, and reducing or preventing the introduction of pollutants from specific sources. A SWQMP prepared for the proposed project is required for project approval. Implementation of site-design BMPs and source- and pollutant-control BMPs would result not only in a reduction of pollutants discharged from the project site, but also in stormwater runoff generated by the project site. As a result, the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, nor provide substantial additional sources of polluted runoff.

Development of the proposed project would include implementation of pollutant-control BMPs in compliance with the Cities of Santee and San Diego's JRMPs and *BMP Design Manuals*, which would remove pollutants to the maximum extent practicable prior to discharge into San Diego River. In addition, the public drainage system would be designed in accordance with the City of Santee's drainage requirements. Therefore, the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, nor provide substantial additional sources of polluted runoff. As such, impacts would be less than significant, and no mitigation measures would be required.

(v) Impede or Redirect Flood Flows?

The proposed resort would be located within the regulatory limits of San Diego River (floodplain and floodway), and the project site receives runoff from Sycamore Canyon Creek (i.e., Santee Recreational Lakes), plus several storm drain outfalls from the existing developments along Carlton Oaks and Mast Boulevard roadway corridors. In addition, runoff from Forrester Creek joins the San Diego River (South Channel) along the southeasterly limits of

the property. As discussed above, the proposed project would include the placement of fill, which would raise the two residential development areas out of the floodplain and the clubhouse and resort area above the 100-year flood levels of the floodway. As a result, development associated with the proposed project would be elevated above flood levels. A portion of the existing golf course would be lowered to compensate for fill placed in the residential and resort areas. The golf course would be redesigned to allow more flow to pass in flooding situations. Grading would remove existing hills and mounds that would otherwise impede flows. San Diego River 100-year flows would be considered during contouring of the course such that the proposed project does not redirect or channelize flows from San Diego River. The proposed fill placement and grading modifications to the golf course would comply with City of Santee *General Plan* policies and generally would result in less than a 0.5-foot increase to the current 100-year flood elevations, which would have no adverse impact on the proposed project or adjacent areas. No development would occur within the designated 100-year floodway on the project site in the post-project condition (Appendix L).

The floodway and floodplain are proposed to be remapped to exclude the proposed development site. Residential areas would continue to remain out of the floodway, consistent with current FEMA mapping. A CLOMR and LOMR must be approved as part of the discretionary approval and would be processed through FEMA to revise the flood mapping at the project site. Therefore, all structures would be elevated above the natural floodplain.

The project site is designated as FEMA Zone AE south of the existing residential areas, adjacent to Carlton Oaks Drive and San Diego River. Development regulations differ for a watercourse with a Zone AE designation compared to a Zone A designation. For a Zone AE floodplain and floodway, development in the floodway is generally discouraged, except for recreational uses such as golf courses and must preclude a rise in the 100-year water surface elevation. Development in the flood fringe (i.e., the area within the floodplain, but outside the floodway) is allowed, subject to San Diego Municipal Code Section 143.0145(f). In addition, the City of Santee Flood Damage Prevention Ordinance (Santee Municipal Code 11.36) requires that for new construction, the lowest finished floor is elevated 1 foot above the base flood elevation provided in the San Diego River Flood Study (Appendix L). The proposed building pad elevations would be set at a minimum of 1 foot above the flood elevations identified in the San Diego River Flood Study and required by the City of Santee Flood Damage Prevention Ordinance (Appendix L). Compliance with FEMA requirements is not required in the City of Santee and San Diego.

The different regulatory standards (FEMA, City of Santee, and City of San Diego) require multiple flow models of the river to be constructed and analyzed to ensure that two primary objectives are met: 1) that all proposed structures are appropriately elevated above the 100-year flood water surface elevation and; 2) that the project does not create an increase in the upstream and downstream water surface elevations. The federal and local sets of standards are similar; however, the City of Santee requires a more conservative approach than FEMA and City of San Diego by increasing the amount of flow in the San Diego River for the 100-year flood models. This increase in flow results in an approximate 2-foot increase in the water surface elevation, as compared to the FEMA models. The City of San Diego defers to the FEMA modeling protocols, with elevating the lowest floor of the proposed structure, including basement, to be 2 feet above FEMA base flood elevation. Even though there are no structures proposed within the City of San Diego, the entire portion of the project within the City of San Diego would be elevated 2 feet above the FEMA base flood elevation.

Furthermore, storm drains would be designed to convey 100-year storm event runoff. Increases in water surface elevation during a 100-year storm would be contained within the channel and would not result in adverse impacts on adjacent structures within the project site, nor immediately upstream and downstream of the project (Appendix L).

The proposed golf course would reshape the existing manufactured ponds on the golf course. The existing maintenance facility in the eastern portion of the project site would remain in its current location. Development associated with the proposed project would be elevated above flood levels. The grading for portions of the residential development areas would occur within the floodplain limits. A small portion of Residential North would encroach into the floodway. The proposed grading for the clubhouse, resort, and the golf course would occur within the existing regulatory floodway. Therefore, the proposed project would potentially impede and redirect flood flows, and impacts would be potentially significant (**Impact HYD-1**).

Impact Determination

Implementation of the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would: (1) result in substantial erosion or siltation on or off site; (2) result in flooding on or off site; or (3) 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. Impacts would be less than significant.

Implementation of the proposed project may impede or redirect flood flows. Potentially significant impacts include those discussed below.

Impact HYD-1: Potential to Place New Development within the Regulatory Floodway and Floodplain Limits

The proposed golf course would reshape the existing ponds on the golf course. The grading for portions of the residential development areas would occur within the floodplain limits. A small portion of Residential North would encroach into the floodway. The proposed grading for the clubhouse and resort would occur within the regulatory floodway.

Mitigation Measures

Mitigation Measure (MM) HYD-1 would be provided to reduce impacts to a less-than-significant level:

MM-HYD-1: Approval of a Conditional Letter of Map Revision and Letter of Map Revision. Prior to issuance of any grading permit, the project applicant shall obtain approval of the CLOMR from FEMA. The CLOMR will include revised local base -flood elevations based on current modeling of the project site. The building pads for all on-site structures will be set a minimum of 1 foot above the maximum 100-year water-surface elevations on the project site associated with the river flow rates as provided in Table 11.36.070 of the City of Santee's Flood Damage Prevention Ordinance. Prior to building permit issuance, the applicant will obtain a LOMR that is approved by FEMA and demonstrate that no building pads would be placed below 1 foot above the calculated local base-flood elevations. The LOMR would officially revise the current FIRM map to show changes to the floodplain, floodway, and flood elevations.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: Would implementation of the proposed project result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact Discussion

The project site is not within a designated tsunami hazard zone and, therefore, residents and visitors would not be subject to the risk of this hazard. *Seiches* are oscillations in an enclosed body of water caused by seismic shaking. The proposed project is not located near a confined body of water on which a seiche could be expected to occur. Therefore, residents and visitors would not be subject to the risk of this hazard.

As described above, the project site is located within the regulatory limits of San Diego River (floodplain and floodway) and receives runoff from Sycamore Canyon Creek (i.e., Santee Recreational Lakes), plus several storm drain outfalls from the existing developments along Carlton Oaks and Mast Boulevard roadway corridors.

The City of Santee Flood Damage Prevention Ordinance (Santee Municipal Code 11.36) requires that for new construction, the lowest finished floor is elevated 1 foot above the base flood elevation provided in the San Diego River Flood Study (Appendix L). The proposed building pad elevations would be set at a minimum of 1 foot above the flood elevations identified in the San Diego River Flood Study (Appendix L). In addition, the proposed project would not include industrial facilities that typically store large quantities of hazardous materials. As a result, the proposed project would not risk release of pollutants due to project inundation. Impacts would be less than significant, and no mitigation would be required.

Impact Determination

Implementation of the proposed project would not occur in flood hazard, tsunami, or seiche zones, nor risk release of pollutants due to project inundation. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 5: Would implementation of the proposed project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Discussion

The Cities of Santee and San Diego's JRMPs are the local water quality management plans that apply to the proposed project. As discussed under *Threshold 1*, the proposed project would be covered under the Construction General Permit and Cities of Santee and San Diego's JRMPs, which would require the project implement site design measures and BMPs to reduce or prevent runoff pollution, as consistent with the applicable JRMP. The proposed project would include proprietary biofiltration BMPs, source-control and site-design BMPs to comply the appropriate water quality control plan. The project-specific Storm Water Quality Management Plan (Appendix K) addresses San Diego River stormwater quality requirements and ensures that the proposed project does not conflict or obstruct implementation of Water Quality Control Plan for the San Diego Basin. Therefore, the proposed project would not

be in conflict with or obstruct implementation of the applicable water quality control management plans for the project site. In addition, the project's conformance with the City of Santee's BMP Design Manual and the City of San Diego's BMP Design Manual would ensure the proposed project would not have the potential for cumulatively considerable impacts or potentially conflict or obstruct implementation of applicable plans.

The San Diego River Valley groundwater basin was designated a very low priority basin by the California Department of Water Resources (DWR). Very low priority basins are not required to prepare Groundwater Sustainability Plans (GSP) per SGMA. A Groundwater Sustainability Agency (GSA) was formed in 2017 for the San Diego River Valley basin, but it did not submit a GSP to DWR. Because the on site irrigation wells are located in a very low priority basin, they are not subject to SGMA regulations. Therefore, the proposed project would not conflict with a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation would be required.

Impact Determination

Implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.9.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would implementation of the proposed project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

The geographic context for the analysis of cumulative impacts in regard to water quality is the Lower San Diego HA [907.1]) for surface water quality and the San Diego River Valley Groundwater Basin for groundwater quality. A significant cumulative impact would occur if development of the proposed project, combined with other past and future development or redevelopment within the potentially affected geographic area, could degrade stormwater quality through increases in impervious surface area and contaminated runoff. This could ultimately violate water quality standards, affect beneficial uses, and/or further impair CWA 303(d)-listed waters within the watershed. The quality of stormwater runoff varies with surrounding land uses, topography, and the amount of impervious cover, as well as the intensity (i.e., energy) and frequency of irrigation or rainfall.

Stormwater drainage can result in cumulative effects on water quality within the affected basin. Development within the vicinity of the proposed project could degrade stormwater quality during construction through land disturbance and during operation through an increase in impervious surface area and contaminated runoff. During construction, runoff may contain sediments and other construction materials and wastes (e.g., concrete debris), resulting from activities such as site clearing, demolition, the removal of the existing structure and pavement, grading, excavation, paving, and landscaping. During operation, runoff may contain oil, grease, and metals that has accumulated in streets and parking lots, as well as pesticides, nutrients, animal waste, and trash from landscaped areas.

When the effects of the proposed project on water quality are considered in combination with the overall project and potential effects of other cumulative projects, there would be the potential for cumulative impacts on surface and groundwater quality. The incremental water quality impact contribution from implementation of the proposed project would be minor; however, the combined effects on water quality from the proposed project and other projects could result in a cumulatively significant impact. New projects are subject to the requirements of the San Diego Regional MS4 Permit, the Construction General Permit, and city Municipal Codes as they relate to water quality; these regulatory requirements have been designed to protect water quality. Additionally, development projects would be subject to an environmental-review process, which would identify potential site- and/or project-specific water quality impacts and mitigate for any potential significant impacts. Therefore, cumulative projects would not result in a significant cumulative impact. The proposed project would include proprietary biofiltration BMPs, source-control and site-design BMPs to minimize water quality impacts. Therefore, the proposed project's contribution to water quality impacts would not be cumulatively considerable.

Cumulative Threshold 2: Would implementation of the proposed project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The geographic context for the analysis of cumulative groundwater impacts is the San Diego River Valley Groundwater Basin. During construction of other reasonably foreseeable development projects within the basin, potential dewatering could be conducted on a one-time or temporary basis during the construction phase, but would not result in a loss of water that would deplete groundwater supplies. Cumulative development could require increases in water supplies from groundwater resources. However, a water supply assessment would be completed to ensure sustainable use of groundwater supplies for eligible projects as defined by Senate Bill 610. During operation, new impervious areas could reduce the potential for groundwater recharge. However, most other reasonably foreseeable projects in the basin would be redevelopment or infill projects in highly urbanized areas, where there is limited existing recharge through infiltration due to impervious area. Development in highly urbanized areas would not be expected to increase the amount of impervious surfaces substantially because this development would be occurring mostly in areas with a substantial amount of existing impervious surfaces. Therefore, groundwater recharge from percolating rainfall would not be adversely affected, and an indirect lowering of the local groundwater table would not be likely to occur. Although implementation of the proposed project would result in an increase in impervious surface area, redevelopment requirements (e.g., incorporation of stormwater BMPs) would improve retention compared to existing conditions. Project BMPs would infiltrate and capture runoff such that an increase in impervious surfaces would not substantially change groundwater recharge compared to existing conditions. Therefore, a significant cumulative impact would not occur without implementation of the proposed project.

Therefore, the proposed project would not contribute to a cumulatively considerable decrease in groundwater supplies, nor would it substantially interfere with groundwater recharge.

Cumulative Threshold 3: Would implementation of the proposed 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 that could: (i) result in substantial erosion or siltation on or off site; (ii) substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; (iii) create or contribute runoff water that 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?

The geographic context for the cumulative impact analysis concerning hydrology and water quality is the San Diego HU, in the Lower San Diego HA (907.1). Construction of cumulative projects would involve grading and other earthmoving activities that could result in temporary localized soil erosion. However, these site-specific impacts would not be expected to combine with the effects of other regional activities because projects would comply with federal, state, and local regulations, including the Construction General Permit and Regional MS4 Permit. Compliance with applicable regulations would also require that projects be designed to reduce stormwater runoff from project sites by promoting infiltration, minimizing impervious surfaces, requiring no net increase in flows, and controlling erosion- and construction-related contaminants at each construction site.

Cumulative development within the vicinity of the proposed project could increase the volume and rate of stormwater runoff. Such increases could cause localized flooding if the storm drainage capacity were exceeded or conveyed excess flows to overbank areas where flood storage may not be available. Generally, cumulative projects would occur in developed areas with existing impervious surfaces, and would not be expected to substantially increase the amount of new impervious surfaces.

All new development is required to handle stormwater in a manner that ensures that flooding would not increase, and flood flows would not be redirected to other areas that are not currently prone to flooding. All cumulative projects would be required to include stormwater management features, such as LID measures, into project designs to reduce flows to pre-project conditions. If improvements to storm drainage capacity were needed, then the city with jurisdiction would be required to coordinate with local agencies to ensure that the appropriate conditions of approval for storm drainage improvements were identified. In addition, all future projects would be required to comply with the Construction General Stormwater Permit, which requires preparation of an SWPPP. The SWPPP would include a series of specific BMPs that would be implemented during construction to address erosion, accidental spills, and the quality of stormwater runoff, BMPs that have been developed in part to reduce the potential adverse effects associated with site-specific construction activities. Development located in existing or future flood-prone areas could have an effect on contributing to cumulative impacts related to flooding. However, with the implementation of drainage improvements and incorporation of landscaped and continuous drainage system features, any potential for overland flood flows would be minimized.

Post-construction stormwater management BMPs, such as proprietary biofiltration systems and street trees, and dispersion areas, would be included in the proposed project's landscape design. The overall effect of these design features would be a reduction in the total system stormwater runoff rate at the project site. Implementation of the proposed project would not contribute to the potential for flooding, nor the exposure of people and structures to flood risks. The proposed project would include the placement of fill, which would raise the residential development areas out of the floodplain and the clubhouse and resort area above the 100-year flood levels of the floodway. The golf course would be redesigned to allow more flow to pass in flooding situations. Therefore, the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 4: Would implementation of the proposed project result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The geographic context for the cumulative impact analysis concerning hydrology and water quality is the San Diego HU, in the Lower San Diego HA (907.10). The geographic context for cumulative projects that risk release of pollutants due to project inundation are projects within the City of Santee and general vicinity of the project site. Similar to the proposed project, cumulative projects within the City of Santee and vicinity of the project site would not be located within a tsunami hazard zone, and thus would not be subject to a tsunami event. Additionally, because no enclosed bodies of water are located near the cumulative geographic context, it is unlikely that cumulative projects would be inundated by a seiche. Cumulative projects located in a flood hazard area would have restrictions on development and the storage of hazardous materials that would be based on state and City of Santee regulations. Therefore, cumulative projects would not result in a significant cumulative impact associated with release of pollutants due to project inundation. The proposed project would not include industrial facilities that typically store large quantities of hazardous materials. As a result, the proposed project would not risk release of pollutants due to project inundation. Therefore, the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 5: Would implementation of the proposed project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The geographic context for the cumulative impact analysis concerning hydrology and water quality is the San Diego HU, in the Lower San Diego HA (907.10). Urban development associated with cumulative projects within the HU would increase impervious areas and activities that generate pollutants, which could adversely affect receiving waters in the HU. However, most development projects in the San Diego region would be subject to NPDES regulations, such as the Construction General Stormwater Permit and City of Santee's JRMP or City of San Diego's JRMP. These regulations require projects to implement site-design measures and BMPs or source-control BMPs to reduce or prevent runoff pollution and potential effects on water quality that would be consistent with the applicable JRMP.

As previously stated, the San Diego River Valley groundwater basin was designated a very low priority basin by the California Department of Water Resources (DWR). Very low priority basins are not required to prepare Groundwater Sustainability Plans (GSP) per SGMA. A Groundwater Sustainability Agency (GSA) was formed in 2017 for the San Diego River Valley basin, but it did not submit a GSP to DWR. Because the on site irrigation wells are located in a very low priority basin, they are not subject to SGMA regulations. Therefore, the proposed project, and any other project within the San Diego River Valley groundwater basin, would not conflict with a sustainable groundwater management plan nor would it contribute to a cumulatively considerable impact as it relates to a SGMA.

Therefore, a significant cumulative impact associated with obstruction of the Basin Plan or a sustainable groundwater management plan would not occur. During construction, all future projects would be required to comply with the Construction General Stormwater Permit, including preparation and implementation of an SWPPP. During operation, the proposed project would incorporate BMPs into project design and comply with existing federal, state, and local regulations to protect water quality and ensure project compliance with applicable water quality standards. Because the proposed project would not result in impacts on groundwater, and no sustainable groundwater management plan is applicable to the project site, conflicting with obstruction of a sustainable groundwater management plan is not anticipated. Therefore, the proposed project's contribution would not be cumulatively considerable.

3.9.7 Summary of Significant Impacts

Table 3.9-5 provides a summary of the significant hydrology and water quality impacts related to the project and relevant mitigation measures.

Table 3.9-5. Summary of Significant Hydrology and Water Quality Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact HYD-1: Potential to Place New Development within the Regulatory Floodway and Floodplain Limits	MM-HYD-1: Approval of a Conditional Letter of Map Revision prior to grading permits and Letter of Map Revision prior to building permit.	Less than significant	The placement of fill would raise the residential development areas out of the floodplain and the clubhouse and resort area above the 100-year flood levels of the floodway. The golf course would be redesigned to allow more flow to pass in flooding situations. The LOMR will officially revise the current FIRM map to show changes to the floodplain, floodway, and flood elevations.

CLOMR = Conditional Letter of Map Revision; FIRM = Flood Insurance Rate Maps; LOMR = Letter of Map Revision.

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3.10 Land Use and Planning

3.10.1 Overview

This section describes the existing land use and planning policies and regulatory framework applicable to the Carlton Oaks Country Club and Resort Project (project) site and vicinity, identifies associated regulatory requirements, evaluates potential environmental impacts related to the project's consistency with these planning policies, and identifies mitigation measures. The consistency of adopted plans has also been evaluated in other sections of this Environmental Impact Report (EIR), as applicable (e.g., traffic, air quality, noise, biology, water quality, and water supply).

3.10.2 Environmental Setting

3.10.2.1 Project Site

The project site comprises approximately 165 acres between the Cities of Santee and San Diego. Approximately 100.6 acres of the project site are located within the City of Santee, and approximately 64.2 acres are within the City of San Diego. The California Environmental Quality Act (CEQA) Study Area also included approximately 3.5 acres of off-site improvement areas within the City of Santee and City of San Diego for a total area of approximately 169 acres. The project site is roughly bounded by Carlton Oaks Drive to the north, Mast Park West on the east, San Diego River and State Route (SR-) 52 to the south, and West Hills Parkway to the west.

Current uses at the project site include the golf course, driving range, and a 52-room hotel, as well as other ancillary buildings, such as a clubhouse, swimming pool, and maintenance shed. The project site is currently designated as Park/Open Space (P/OS) and Planned Development (PD). One existing home located at 9225 Inglewood Drive in the project site, is designated as Low-Medium Density Residential (R-2) by the City of Santee's *General Plan Land Use Element* (City of Santee 2003a); (Figure 3.10-1, Land Use Map) Driveway access to this home is proposed to be changed. No changes to the existing structure would occur. The project also proposes to vacate a portion of the public right-of-way (ROW) at Inwood Drive and construct a single-family home on a minimum of 6,000-square-foot lot consistent with the underlying zone. The area designated as PD is in the northern and western portions of the project site, bordering the existing residential land uses that are designated R-2 and Medium-High Density Residential (R14). In the City of San Diego's *General Plan* (City of San Diego 2024), the southern part of the project site is designated as Open Space.

The project proposes to demolish the existing Carlton Oaks golf course clubhouse, restaurant/bar, pro shop, hotel and hotel cottages, and surface parking lots; to redevelop the golf course; and to construct new residential accessory uses and a resort facility. The proposed project components include a professionally redesigned and publicly accessible golf course, clubhouse, and hotel/cottages. Residential homes are also planned as an accessory use to the golf course and the Carlton Oaks Country Club. The residential components of the proposed project would be constructed in the western and northern portions of the project site (Residential West and Residential North, respectively).

Residential West would consist of 86 multifamily detached units at a density of 9 dwelling units per gross acre (86 units / 9.54 acres = 9.0146 dwelling units per acre). The detached residential units would be located within single parcels in which the underlying land would be held in common ownership. All 86 multifamily detached units would be within the PD zone.

Residential North is in the northern portion of the project site and would consist of 150 detached multifamily residential units, six new single-family homes, and modification to a driveway of one existing single-family home. A total of 156 units in Residential North are located within the PD zone, and the existing single-family home is within the R2 zone. Density within the PD zone would be 8.2 dwelling units per acre (156 units / 19.108 acres = 8.16 dwelling units per acre), and density within the R2 zone would be 2.7 dwelling units per acre (1 unit / 0.367 acre = 2.7 dwelling units per acre).

Single-family and multifamily dwellings are allowable uses within the PD zone with a development review permit (City of Santee Municipal Code Section 13.19.030 A). Development standards will also be established through the development review permit and are provided as Appendix S, Planned Development District Standards. The project proposes a density of 8.2 to 9 dwelling units per acre in the PD zone, which is equivalent to the densities allowed in the City of Santee's R7 land use district. The R7 land use district allows for a wide range of residential development types, including attached and detached single-family units, multifamily attached units, and apartment and condominium buildings. The project's unit types would fall within the R7 land use district category.

Gillespie Field is located approximately 1.45 miles north/northwest of the project site. The project site falls within the Airspace Protection Area for Gillespie Field, which is the area beneath the imaginary surfaces surrounding the airport, as defined by the criteria set forth in Federal Aviation Regulation (FAR) Part 77 (Airspace Surfaces), and the U.S. Standard for Terminal Instrument Procedures to establish the maximum safe height that objects on the ground can reach without potentially creating constraints or hazards to the use of airspace by aircraft (ALUC 2010). The project site is also within the Overflight Notification Area surrounding Gillespie Field (San Diego County Regional Airport Authority 2023) and within the boundary of the Federal Aviation Administration's (FAA) Height Notification Area. Projects within the FAA Height Notification Area are required to notify the FAA of certain proposed construction or alteration, based on the criteria established in FAR Part 77, that deals with objects affecting navigable airspace in the vicinity of airports. Please see Figure 3.8-1, Gillespie Field Compatibility Policy Map: Part 77 Airspace Protection; Figure 3.8-2, Gillespie Field Avigation Easement and Overflight Notification Areas; and Figure 3.8-3, Gillespie Field Compatibility Policy Map: Airport Influence Area, in Section 3.8, Hazards and Hazardous Materials.

The project site is approximately 6.15 miles southeast of the Marine Corps Air Station (MCAS) Miramar. A small area in the northeastern portion of the project site is within the Airport Influence Area (AIA) Review Area 2, and Overflight Notification Area for MCAS Miramar (San Diego County Regional Airport Authority 2023). Please see Figure 3.8-4, MCAS Miramar Compatibility Policy Map: Airport Influence Area, in Section 3.8, Hazards and Hazardous Materials.

The project site is within a wildland/urban interface location that is in an area statutorily designated a Local Responsibility Area. Also, the western portion of the project site is classified as a Very High Fire Hazard Severity Zone (VHFHSZ), High Fire Hazard Severity Zone (HFHSZ), and Moderate Fire Hazard Severity Zone (MFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE). Please see Figure 3.18-1, Fire Hazard Severity Zones, in Section 3.18, Wildfire.

To gain access to Residential West, an access easement across vacant, previously disturbed lands owned by the City of San Diego Public Utilities Department would be required. Access would be obtained from a private driveway extending from West Hills Parkway that would connect to two private roadways through the proposed Residential West neighborhood. The proposed easements would allow private and emergency access and other improvements for the proposed subdivision.

In addition, the San Diego River (North Channel) runs through the northern portion of the project site in an east-west direction, just south of the developed area, and the San Diego River (South Channel) runs east-west at the

southern boundary of the project site, south of the southern end of the golf course. As such, portions of the project site fall within the regulatory limits of the San Diego River (floodplain and floodway) and portions of the project site fall within a mapped Federal Emergency Management Agency (FEMA) 100-year floodplain (Zone AE) (see Figure 3.9-2, FEMA Flood Zones and County Dam Inundation Zone, in Section 3.9, Hydrology and Water Quality).¹

3.10.2.2 Surrounding Uses

The area surrounding the project site to the north and northeast comprises a suburban development pattern and contains almost entirely single-family residential uses or townhouse-style multifamily housing. Mast Park, a few small apartment complexes, and neighborhood-serving commercial centers are located to the east of the project site. The San Diego River, open space, and SR-52 are located to the south of the project site. West Hills Parkway, SR-52, and open space are to the west of the project site.

¹ A *floodway* includes the channel and adjacent overbank areas necessary to effectively convey flood waters. A *floodplain* comprises the floodway and the floodway fringe, which are the lands outside the floodway, at or below the base-flood elevation, that store, but do not effectively convey, floodwaters. FEMA regulates the floodplain to represent the 1% annual-chance flood, known as the *base-flood elevation*.

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|---|----------------------------|------------------------------|------------------------------|---------------------------------------|
| Project Boundary | Potential Resort Area | General Plan Land Use | P/OS - Park/Open Space | R7 - Medium Density Residential |
| Off-Site Improvement Limits | Potential Residential Area | San Diego | PD - Planned Development | R14 - Medium High Density Residential |
| City of Santee/San Diego Municipal Boundary | | Santee | PUB - Public | R22 - High Density Residential |
| | | GC - General Commercial | R2 - Low Density Residential | |

Source: Development Areas-Hunsaker, 2023; Land Use-City of Santee; Imagery-SANGIS (2023)

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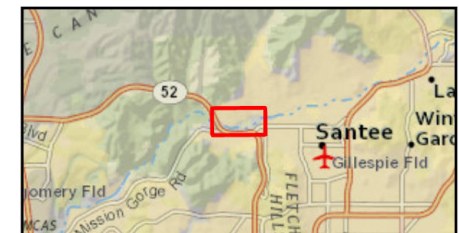


Figure 3.10-1
Land Use Map

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3.10.3 Applicable Laws and Regulations

3.10.3.1 Federal

Federal Aviation Administration Height Notification Boundary

The *Gillespie Field Land Use Compatibility Plan* (ALUC 2010) identifies the FAA Height Notification Boundary and FAR Part 77 (discussed in Section 3.8, Hazards and Hazardous Materials, of this EIR), which establishes requirements for notifying the FAA of certain construction activities and alterations to existing structures to ensure that there are no obstructions to navigable airspace. The boundary extends 20,000 feet from the runway. Within the boundary, FAR Part 77 requires that the FAA be notified of any proposed construction or alteration having a height greater than an imaginary surface extending 100 feet outward and 1 foot upward (i.e., slope of 100:1) from the runway. Outside the boundary, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA. Please see Figure 3.8-1, Gillespie Field Compatibility Policy Map: Part 77 Airspace Protection; Figure 3.8-2, Gillespie Field Avigation Easement and Overflight Notification Areas; Figure 3.8-3, Gillespie Field Compatibility Policy Map: Airport Influence Area; and Figure 3.8-4, MCAS Miramar Compatibility Policy Map: Airport Influence Area, in Section 3.8, Hazards and Hazardous Materials.

Federal Emergency Management Agency

FEMA administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection is established by FEMA. FEMA's minimum level of flood protection for new development is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

Additionally, FEMA has developed requirements and procedures for evaluating earthen levee systems and mapping the areas affected by those systems. Levee systems are evaluated for their ability to provide protection from 100-year flood events, and the results of this evaluation are documented in the FEMA Levee Inventory System. Levee systems must meet minimum freeboard standards and must be maintained according to an officially adopted maintenance plan. Other FEMA levee system evaluation criteria include structural design and interior drainage.

3.10.3.2 State

California State Planning and Zoning Law (California Government Code Section 65000–66037)

The law delegates most of the state's local land use and development decisions to cities and counties and describes laws pertaining to the regulation of land uses by local governments, including the General Plan requirement, Specific Plans, subdivisions, and zoning.

3.10.3.3 Regional

Gillespie Field Airport Land Use Compatibility Plan

Public Utilities Code Section 21675 requires each Airport Land Use Commission to formulate an Airport Land Use Compatibility Plan (ALUCP). The basic function of ALUCPs is to promote compatibility between airports and the land

uses that surround them “to the extent that these areas are not already devoted to incompatible uses” (Public Utilities Code Section 21674[a]). With limited exception, California law requires preparation of ALUCPs for each public-use and military airport in the state. California Government Code Section 65302.3 further requires that general plans and any applicable specific plan be consistent with ALUCPs. In addition, general plans and applicable specific plans must be amended to reflect amendments to the ALUCP. Most counties have established an Airport Land Use Commission (ALUC), as provided for by law, to prepare ALUCPs for the airports in that county and review land use plans, development proposals, and certain airport development plans for consistency with the compatibility plans. In the County of San Diego, the ALUC function rests with the Board of the San Diego County Regional Airport Authority, in accordance with California Public Utilities Code Section 21670.3.

In accordance with California Public Utilities Code Section 21675, the Gillespie Field ALUCP was published in January 2010 and approved in December 2010 (ALUC 2010). The Gillespie Field ALUCP is intended to: (1) provide for the orderly growth of the Gillespie Field Airport and the area surrounding the airport; and (2) safeguard the general welfare of the inhabitants within the vicinity of the airport.

Marine Corps Air Station Miramar Airport Land Use Compatibility Plan

The MCAS Miramar ALUCP was approved by the Board of the San Diego County Regional Airport Authority in October 2008. The Miramar ALUCP promotes compatibility between MCAS Miramar and the surrounding land uses by regulating future development of new residential dwellings, commercial and industrial structures, and other noise- or risk-sensitive land uses within the AIA.

Regional Transportation Plan/Sustainable Communities Strategy

Senate Bill (SB) 375, the Sustainable Communities and Climate Protection Act, coordinates land use planning, regional transportation plans (RTPs), and funding priorities to reduce greenhouse gas (GHG) emissions from passenger vehicles through better-integrated regional transportation, land use, and housing planning that provides easier access to jobs, services, public transit, and active transportation options. SB 375 specifically requires the Metropolitan Planning Organization (MPO) relevant to the project area (here, the San Diego Association of Governments [SANDAG]) to include a Sustainable Communities Strategy (SCS) in its RTP that, if implemented, would achieve GHG emission reduction targets set by the California Air Resources Board (CARB) by reducing vehicle miles traveled (VMT) from light-duty vehicles through the development of more compact, complete, and efficient communities.

In December 2021, SANDAG adopted the 2021 Regional Plan, which combines the RTP, SCS, and *Regional Comprehensive Plan* (SANDAG 2021). The SCS describes coordinated transportation and land use planning that exceeds the state’s target for reducing per capita GHG emissions set by CARB. The state-mandated target is a 19% reduction in per capita GHG emissions from cars and light-duty trucks, compared with 2005, by 2035. The 2021 Regional Plan achieves a 20% reduction by 2035. In accordance with SB 375, the 2021 Regional Plan includes five building blocks that are accompanied by strategies to move the San Diego region toward sustainability and to reduce GHG emissions. The five building blocks include the following:

1. A land use pattern that accommodates the San Diego region’s future employment and housing needs, and protects sensitive habitats, cultural resources, and resource areas.
2. A transportation network of public transit, managed lanes and highways, local streets, bikeways, and walkways built and maintained with reasonably expected funding.

3. Managing demands on San Diego’s transportation system (also known as Transportation System Management [TSM]) in ways that reduce or eliminate traffic congestion during peak periods of demand.
4. Managing the TSM through measures that maximize the overall efficiency of the transportation network.
5. Innovative pricing policies and other measures designed to reduce VMT and traffic congestion during peak periods of demand.

The 2021 Regional Plan also updates growth forecasts and is based on the most recent planning assumptions considering currently adopted land use plans, including the City of Santee’s *General Plan* and other factors from the cities in the region and the County of San Diego. The 2021 Regional Plan would change in response to the ongoing land use planning of the City of Santee and other jurisdictions. For example, the City of Santee’s *General Plan* and other local general plans of cities may change based on General Plan amendments initiated by the jurisdiction or landowner applicants. The General Plan amendments may result in increases in development densities by amending the regional category designations or zoning classifications. Accordingly, SANDAG’s RTP/SCS latest forecasts of future development in the San Diego region, including location, must be coordinated closely with each jurisdiction’s ongoing land use planning because that planning is not static, as recognized by the need for updates to SANDAG’s RTP/SCS every 4 years.

3.10.3.4 Local

City of Santee

General Plan

Divided into nine elements, the City of Santee’s *General Plan* (1984) is a statement of intent by the City of Santee as to the future development of the community. This is accomplished through objectives and policies that serve as a long-term guide for physical, economic, and environmental growth.

Land Use Element

The City of Santee’s *General Plan – Land Use Element* (City of Santee 2003a) is intended to promote development of a well-balanced and functional mix of residential, commercial, industrial, open space, recreation, and civic uses that create and maintain a high-quality environment. The *Land Use Element* contains goals, policies, and programs concerning land use. The following includes all applicable objectives and policies from the *Land Use Element*:

Objective 2.0: Allow for development of a wide range of housing types in the City.

Policy 2.1: The City should promote the use of innovative site planning techniques that contribute towards provision of a variety of residential product styles and designs.

Policy 2.2: The City should encourage the development of higher density residential developments in areas close the multi-modal transit station and along major road corridors where transit and other convenience services are available.

Policy 2.3: The City should encourage planned residential and/or planned unit developments that provide adequate open space, recreational facilities, off-street parking, interior circulation patterns and other amenities and facilities.

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 consider the use of public / private partnerships when appropriate to facilitate introduction of desirable and innovative development within the City.

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.

Objective 6.0: Ensure that natural and man-induced hazards are adequately addressed in the location and intensity of development in the City.

Policy 6.2: The City should promote the use of innovative site planning to avoid on-site hazards and minimize risk levels.

Objective 7.0: Undertake development of large, contiguous, vacant or underutilized parcels in a comprehensive manner.

Policy 7.1: The City shall utilize and initiate, in appropriate locations, the use of comprehensive planning process for development of large landholdings. Appropriate locations shall include large contiguous vacant or underutilized parcels (i.e., 10 acres or larger in area) under single ownership that contain unique resources such as a hillside or watercourse, where a combination of uses are proposed on the site or where phased implementation of the development is necessary to minimize the impact on the City. If a comprehensive planning process involves multiple ownerships, the plan should apply to the total area of these ownerships. For smaller contiguous vacant or underutilized parcels (i.e., less than 10 acres in area), a comprehensive planning process should be considered to allow for the comprehensive development of the land.

Policy 7.2: A comprehensive development plan shall be prepared prior to approving any subdivision of land or land development proposal unless the Director of Development Services makes a determination that the subdivision would not have a significant effect on the ultimate development of the property.

Objective 8.0: Minimize land use conflicts and maximize mutual benefits between adjacent land uses in the City.

Policy 8.1: The City shall, upon adoption of the updated General Plan, undertake a comprehensive review and revision of the existing Zoning Ordinance and related codes in a timely manner to ensure they are compatible with, and adequately implement, the General Plan.

Policy 8.2: The City should consider relocation of remedial buffering treatments for mitigating land use conflicts.

Policy 8.3: The City should encourage an innovative mix of land uses when such a mix could enhance the viability of development and provide for common public services and site planning requirements.

Policy 8.4: The City should consider the Adjacent Land Use Compatibility Guide chart to assist in an initial determination of overall land use compatibility for adjacent land uses.

Policy 8.5: The City shall strive to minimize direct and indirect impacts on existing or planned preserved open space from adjacent development.

Objective 9.0: Minimize land use conflicts between land use in adjacent areas and existing and planned land uses in the City.

Policy 9.1: The City should encourage the City of San Diego to protect vacant lands in the East Elliot area along the City's western boundary as part of a regional biological preserve system.

Objective 11.0: Ensure that development in the City is consistent with the overall community character and contributes positively towards the City's image

Policy 11.1: The City shall ensure that all requirements set forth within the Community Enhancement Element are implemented during the development review process.

The *Land Use Element* designates that the project site be developed according to a master development plan consistent with seven Guiding Principles. These include the following:

1. The development of the Carlton Oaks Country Club property should focus on mixed-use recreation-related development that is oriented toward and enhances San Diego River and related to other recreational areas within the City of Santee.
2. The property should be focused on a high-quality resort and recreation-related uses. Any residential uses should be accessory and related to the primary recreational use.
3. Ancillary uses, such as restaurants, retail uses, or hotels, must be allowed by Conditional Use Permit (CUP) if such uses are determined to be ancillary to the existing or planned resort and recreational facilities.
4. Use of the site should orient to and be compatible with San Diego River.
5. Development should respect the river environment, including protection of the riparian habitat and protected species.
6. Development should protect natural drainage and ensure protection of water quality.
7. A multipurpose public trail must be provided on the property on the northern side of San Diego River, linking with existing and planned trails to the east and west of the site.

Measure N: the General Plan Protection Initiative

An initiative known as *Measure N, the General Plan Protection Initiative* (GP Initiative or Measure N) was passed by City of Santee voters and took effect on December 3, 2020. Measure N added a number of policies to the City of Santee's *General Plan* for the expressed purposes that have been described as: "(1) to protect the City of Santee's *General Plan* from unwise densification and intensification amendments; and (2) to protect the residents of Santee from overdevelopment with resultant traffic gridlock" (City of Santee 2020).

The GP Initiative added Policy 12.1 to the City of Santee's *General Plan*, which reads as follows:

Policy 12.1: Permitted land uses in the City shall be intensified only when the voters approve such changes. No General Plan amendment, Planned Development Area or new Specific Planning Area shall be adopted which would:

- 1) increase the residential density permitted by law,
- 2) change, alter, or increase the General Plan Residential Land Use categories if the change intensifies use; or
- 3) change any residential designation to commercial or industrial designation on any property, or vice versa, if the change intensifies use; unless and until such action is approved and adopted by the voters of the City at a special or general election, or approved first by the City Council and then adopted by the voters in such an election."

The GP Initiative also amended the City of Santee's *General Plan* by adding Policy 12.2, which prohibits changes to the *General Plan* related to slope criteria, minimum parcel sizes, and lot averaging that would increase density or intensity of use, without such changes being approved by the voters of Santee. Finally, other miscellaneous *General Plan* edits were made to promote internal consistency among the various sections of the *General Plan*, including adding language to the *Housing Element* that would require, depending on the nature of the General Plan amendment and/or rezone involved, to be approved by the voters.

Housing Element

The City of Santee's *General Plan – Housing Element* has been designed to provide the City of Santee with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. Per state law, the *Housing Element* has two main purposes. The first is to provide an assessment of both current and future housing needs and constraints in meeting these needs, and the second is to provide a strategy that establishes housing goals, policies, and programs. The *Housing Element* is an 8-year plan for the 2021–2029 period and identifies strategies and programs that focus on matching housing supply with need, maximizing housing choice throughout the community, assisting in the provision of affordable housing, removing governmental and other constraints to housing investment, and promoting fair and equal housing opportunities. The Carlton Oaks Golf Course is listed in the *Housing Element* as a project that is under review. As of July 1, 2020, a total of 436 units were at various stages of review and approval in the City of Santee. All units were considered affordable only to above moderate households, with the exception of one very low-income unit in the Atlas View Drive project in exchange for a density bonus (City of Santee 2022).

Mobility Element

The City of Santee's *General Plan – Mobility Element* is intended to guide the development of the City of Santee's circulation system in a manner that is compatible with the *Land Use Element*. The purpose of the *Mobility Element* is to identify policies and programs to promote the effective use of transportation facilities to efficiently and safely move people and goods throughout the City of Santee. The *Mobility Element* consists of existing conditions of various modes of transportation including vehicle, bicycle, mass transit, carpooling, pedestrian, and airports, mobility needs of the City of Santee, objectives and policies to meet those needs, and an implementation plan (City of Santee 2017).

Recreation Element

The City of Santee's *General Plan – Recreation Element* is a permissive element adopted by the City of Santee to address recreation resources and facilities in the City of Santee. The purpose of this element is to identify park and other recreational resources that exist within the City of Santee and to suggest ways in which these resources can be preserved or enhanced. This element discusses existing conditions and future recreational needs. As discussed in the *Recreation Element*, Carlton Oaks Golf Course is a recreational amenity that is provided to City of Santee residents (City of Santee 2003b).

Trails Element

The City of Santee's *General Plan – Trails Element* is a permissive element adopted by the City of Santee to identify the location and availability of trails in the City of Santee. The purpose of this element is to identify and plan for the City of Santee's needs in the future for the development of bicycle, equestrian, and pedestrian trails. This element is designed to set policies and implementation strategies for the development of a comprehensive, Citywide trail system that would encourage residents to use alternative modes of transportation for both recreation and commuting (City of Santee 2003c).

Conservation Element

The City of Santee's *General Plan – Conservation Element* is a mandated element and may include water, forests, rivers, soils, minerals, fisheries, and wildlife. This element also incorporates information required in the *Open Space Element*, which is also mandated by the state, to create one element by consolidating the requirements of two. The purpose of the *Conservation Element* is to identify the community's natural and built resources, and to encourage their wise management to ensure their continued availability for use, appreciation, and enjoyment (City of Santee 2003d).

Noise Element

The purpose of the City of Santee's *General Plan – Noise Element* is to provide information for programs to control and abate environmental noise, and to protect the citizens of Santee from excessive exposure to noise. The *Noise Element* analyzes and quantifies existing and projected noise levels for freeways, primary arterial and major local roads, transit, and aircraft and airports, as well as stationary noise sources, from industrial plants to outdoor manufacturing uses. Possible solutions and implementation strategies also are addressed (City of Santee 2003e).

Safety Element

The purpose of the City of Santee's *General Plan – 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 *Safety Element* also identifies plans and programs for emergency response (City of Santee 2003f).

Community Enhancement Element

The City of Santee's *General Plan – Community Enhancement Element* addresses overall community design and community character issues. The purpose of this element is to address the interrelationships of citizens and the built environment in terms of scale, design, sense of community, and wellbeing. This element identifies opportunities to enhance the character and livability of the City of Santee and provides guidelines to achieve such aims (City of Santee 2003g).

City of Santee Municipal Code

City of Santee Municipal Code Sections 13.16 and 13.19 establish development standards for P/OS and PD districts, respectively. As indicated in the Municipal Code, development standards related to site dimensions, height limitations, and setbacks that could govern the visual quality of the site are determined on a site-by-site basis. However, City of Santee Municipal Code Section 13.16.040(B), Development Criteria, for P/OS districts requires that development within these districts minimize alteration to the natural landforms. In addition, City of Santee Municipal Code Section 13.19.030 specifies that PD districts be consistent with the guidelines contained in the *Land Use Element* of the *General Plan* for each respective PD-designated property (identified above for the project site).

City of Santee Flood Damage Prevention Ordinance

The City of Santee's Flood Damage Prevention Ordinance (City of Santee Municipal Code 11.36) defines special flood hazard areas within the City of Santee and regulates work taking place within these special flood hazard areas. The intent of the Ordinance is to reduce the risks to residents and public and private improvements from flooding. The Ordinance precludes development in flood-prone floodway areas and requires all new development to be designed to be 1 foot above the height of the 100-year flood. In addition, the Ordinance controls dredging, filling, or other activities that could modify the natural floodplain and prevents construction of barriers or structures that could divert flood flows and cause upstream or downstream impacts.

City of San Diego

The portion of the project site located within the City of San Diego jurisdiction is designated as Open Space.

General Plan

Land Use Element

The City of San Diego's *General Plan – Land Use and Community Planning Element* (City of San Diego 2024) provides policies to guide the City of San Diego's growth and implement the City of Villages strategy within the context of San Diego's community planning program. The *Land Use Element* addresses land use issues that apply to the City of San Diego as a whole. The following includes the only applicable policy from the *Land Use Element*:

LU-B.3: Plan for and develop mixed-use projects where a site or sites are developed in an integrated, compatible, and comprehensively planned manner involving two or more land uses.

Urban Design Element

The City of San Diego's *General Plan – Urban Design Element* (City of San Diego 2024) provides policies to guide physical development consistent with the social, economic, aesthetic, and equity values of the City of San Diego. “Urban design” describes the physical features that define the character or image of a street, neighborhood, community, or the city as a whole. Urban design provides the visual and sensory relationship between people and the built and natural environment. The built environment includes buildings and streets, and the natural environment includes features such as shorelines, canyons, mesas, and parks as they shape and are incorporated into the urban framework. Citywide urban design recommendations are necessary to ensure that the built environment continues to contribute to the qualities that distinguish the City of San Diego as a unique living environment. The following includes applicable policies from the *Urban Design Element*:

UD-A.2: Use open space and landscape to define and link communities.

UD-A.3: Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.

UD-A.10: Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.

Economic Prosperity Element

The City of San Diego's *General Plan – Economic Prosperity Element* (City of San Diego 2024) strives to increase wealth and the standard of living of all San Diegans with policies that support a diverse, innovative, competitive, entrepreneurial, and sustainable local economy. The policies in this element are intended to improve economic prosperity by ensuring that the economy grows in ways that strengthen our industries, retain and create good jobs with self-sufficient wages, increase average income, and stimulate economic investment in our communities. A strong economy creates the wealth that allows San Diegans to support the public facilities, services, and quality of life they demand. The following includes applicable policies from the *Economic Prosperity Element*:

EP-I.3: Support destination attractions in San Diego that enhance tourism trade in the City including but not limited to natural resource destinations, commercial recreational attractions, sporting events, convention and meeting facilities, and the cruise ship industry.

Public Facilities, Services and Safety Element

The City of San Diego's *General Plan – Public Facilities, Services and Safety Element* (City of San Diego 2024) strives to provide the public facilities and services needed to serve the people that live in and visit San Diego. This element addresses facilities and services that are publicly managed and have a direct influence on the location of land use. These include fire rescue, police, wastewater, stormwater, water infrastructure, waste management, libraries, schools, information infrastructure, disaster preparedness, and seismic safety. *Public Facilities, Services and Safety Element* goals and policies are associated with providing adequate public facilities and services to serve the existing population and new growth. Applicable recommendations include requiring development proposals to

fully address impacts to public facilities and services. The following includes applicable policies from the *Public Facilities, Services, and Safety Element*:

PF-G.2: Install infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies.

Recreation Element

The City of San Diego's *General Plan – Recreation Element* (City of San Diego 2024) contains goals and policies to address the challenges the City of San Diego faces to preserve, protect, develop, operate, maintain, and enhance public recreation opportunities and facilities throughout the city. The purpose of the element is to help manage the increasing demand on existing/remaining usable park and recreation resources/facilities, develop open space lands and resource-based parks for population-based recreational purposes, ensure the distribution and access to parks is achieved equally citywide recognizing the unique differences among communities, and achieve livable neighborhoods and communities. The following includes applicable policies from the *Recreation Element*:

RE-D.6: Provide safe and convenient bicycle, pedestrian, and micro mobility linkages to, and within, park and recreation facilities and open space areas.

RE-D.7: Provide public access to open space for recreational purposes.

RE-F.3: Provide for sensitive development of recreation uses within and adjacent to City-owned open space lands.

RE-F.7: Encourage the planning and coordination of river parks to provide public recreational opportunities, protect natural resources, and enhance community character.

Conservation Element

The City of San Diego's *General Plan – Conservation Element* (City of San Diego 2024) contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, help define the City of San Diego's identity, and are relied upon for continued economic prosperity. The purpose of this element is to help the City of San Diego become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich natural resources that help define the City of San Diego's identity, contribute to its economy, and improve its quality of life. The following includes applicable policies from the *Conservation Element*:

CE-A.11: Implement sustainable landscape design and maintenance.

CE-B.1: Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.

CE-B.5: Maximize the incorporation of trails and greenways linking local and regional open space and recreation areas into the planning and development review processes.

City of San Diego Municipal Code

The City of San Diego's Land Development Code (City of San Diego Municipal Code Chapters 11–15) contains numerous provisions to guide the design of development throughout the City of San Diego, including development restrictions and guidelines to protect and enhance environmentally sensitive lands (ESLs). The ESL Regulations (City of San Diego Municipal Code Section 143.0101, et seq.) establish development regulations for sensitive biological resources. The Land Development Code (City of San Diego Municipal Code Section 142.0101, et seq.) also contains grading regulations to address (among other things) landform preservation and require that all grading be designed and performed in conformance with applicable City of San Diego standards and City Council policies.

City of San Diego Environmentally Sensitive Land Regulations

The City of San Diego designates a variety of ESL types and overlays through its General Plan (City of San Diego 2024), Municipal Code, and Land Development Manual (City of San Diego 2004). As defined in the City of San Diego Municipal Code Section 143.0110, ESLs include those areas with sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and special flood hazard areas. ESL Regulations apply when these specially designated land resources are present. As outlined in Appendix E, *Biological Resources Report*, the presence of sensitive biological resources and wetlands associated with San Diego River qualify the project site as an ESL, which is therefore subject to the City of San Diego's ESL Regulations and may require a site development permit from the City of San Diego. The ESL designation means the project would be subject to the restrictions and requirements outlined in the City of San Diego *Land Development Code Biology Guidelines* (City of San Diego 2018).

East Elliott Community Plan

The primary goal established in the *East Elliott Community Plan* (City of San Diego 2015) as it relates to the land use for the project is to implement the *San Diego River Park Master Plan* (City of San Diego 2013a). The *East Elliott Community Plan* designates the project site for open space uses. The *East Elliott Community Plan* includes Open Space Management Guidelines that are designed to foster preservation and enhancement of the natural open space areas that cover a majority of the planning area. It should be noted that the area designated as "open space" within the *East Elliott Community Plan* is currently a developed golf course, and it is not natural or sensitive open space.

The guidelines are as follows:

1. Natural open space areas should remain undeveloped with disturbance limited to trails and passive recreational uses such as walking, hiking and nature study that are consistent with preservation of natural resources.
2. More active recreation uses, including horseback riding and mountain biking, may also be permissible if measures are taken to ensure that biological values are not threatened.
3. Public access to limited areas of particularly sensitive natural open space could be restricted. Examples of locations where access could be controlled include vernal pool areas and identified nesting areas for endangered or threatened animal or bird species.
4. Additional recreational uses may be appropriate along the preserve edge or in the relatively limited open space areas that do not contain sensitive habitat and wildlife. In these areas, horticultural and gardening

uses could be permitted on a case-by-case basis. Such uses should not involve construction of permanent structures or paved areas.

5. Open space areas which cover an entire ownership should be preserved through means that include, but are not limited to, acquisition by the City with state and federal assistance or by other large property owners as mitigation lands for environmental impacts anticipated on other properties.
6. Open space areas which cover portions of an ownership and where reasonable development rights still exist on portions of the ownership, should be dedicated by the owner/developer, through an open space/conservation easement. Long-term maintenance should be provided on an individual basis or by an open space management entity that may be formed to implement the MSCP.
7. Disturbed areas designated for open space should be recontoured where feasible, to recreate the natural topography. These areas should also be restored or enhanced where feasible with natural vegetation to return these areas to a natural appearance.
8. At locations where roads, railroads or other urban intrusions traverse open space corridors, provisions should be made to minimize habitat fragmentation and to provide for a continuous open space linkage. In some instances, structures such as bridges or culverts should be sited in lower quality habitat or in disturbed areas to the extent possible.
9. Transition areas should be established between urban uses and the open space system, along traffic corridors and canyon overlooks, where feasible and appropriate. Such transition areas may be developed by providing additional maintenance and planting noninvasive grass, shrubs and trees that provide a sensitive transition between uses.

Mission Trails Design District

The Mission Trails Design District Ordinance and Design Manual (City of San Diego 2013b) cover some 2,000 acres adjacent to Mission Trails Regional Park within the Navajo, Tierrasanta, and East Elliott communities. The Master Development Plan for Lake Murray, Cowles, and Fortuna Mountains Regional Park (now Mission Trails Park) provided the direction for the preparation of this ordinance and design manual by calling for design guidelines to control development in the sensitive areas around the park. The following design policies are applicable to the proposed project:

- New development should relate to the park and existing landscaping in the park.
- The San Diego River areas adjacent to Mission Trails Regional Park should provide visual linkages to and from the park and implement the San Diego River Park Master Plan.

San Diego River Park Master Plan

Adopted by the City of San Diego in 2013, the vision of the *San Diego River Park Master Plan* (Master Plan) (City of San Diego 2013a) uses five principles to inform the plan:

1. Restoring and maintaining a healthy river system
2. Unifying fragmented lands and habitats
3. Creating a connected continuum with a sequence of unique places and experiences
4. Revealing the river valley history
5. Reorienting development toward the river to create value and opportunities for people to embrace the river

The *Master Plan* focuses on the 17.5-mile segment of San Diego River within the boundaries of the City of San Diego, extending from the Pacific Ocean to the city limits shared with the City of Santee and includes the corridor extending 0.5 miles on each side of the river. This corridor has been divided into six reaches for which design guidelines have been established, with the project site located in the Plateau Reach. The *Master Plan* identifies the Plateau Reach as an area of the San Diego River corridor that provides expansive views to the hills above the City of Santee and to the distant mountains in the Cleveland National Forest, but states that the river along this stretch is affected by physical constraints, including the constructed berm on the northern side of the river, which separates the river from the golf course, and SR-52 south of the river. The *Master Plan* identifies the existing informal hiking trail on top of the dike as a potential site for the San Diego River Pathway (called the San Diego River Trail throughout this EIR). The *Master Plan* identifies the following recommendations for the Plateau Reach:

- A. Coordinate with Caltrans to identify potential alignment and methods to create the San Diego River Pathway under State Highway 52.
- B. Through a feasibility study and an associated environmental document determine the best location for the San Diego River Park Pathway connecting Mission Trails Regional Park to the City of Santee, along with connections to West Hills Parkway. Include in the study where a soft surface trail could be provided separate from the paved pathway to accommodate a variety of users.
- C. Initiate a dialogue with Carlton Oaks Golf Course to explore the potential to evolve the golf course edge into a naturalized landscape buffer with native plant species and a vegetation management plan that removes exotic plants. The buffer should be designed to provide habitat, as well as an infiltration device to treat the golf course surface runoff before it goes into the river.
- D. Look at opportunities to restore the natural open space adjacent to the river if the golf course were to change in the future and the site is redeveloped into a new use.
- E. Provide a kiosk at the boundary of the City of San Diego and the City of Santee that identifies the eastern entrance of the San Diego River Park.

As noted above, the Master Plan identifies the informal pedestrian trail along the southern side of the golf course as a potential alignment for the San Diego River Pathway and recommends that the open space corridor through which the river flows be expanded in order to provide an adequate width for recontouring the river channel to allow increased river length and meandering, increased riparian habitat, and runoff buffering at the golf course.

3.10.4 Project Impact Analysis

3.10.4.1 Methodology

Impacts related to land use were assessed based on the proposed project and review of applicable documents, such as general plans for City of Santee and City of San Diego. Criteria from State CEQA Guidelines Appendix G and standard professional practice were used to determine whether the proposed project would have a significant impact on land use.

3.10.4.2 Thresholds of Significance

The following significance criteria are based on State CEQA Guidelines Appendix G and provide the basis for determining the significance of impacts associated with land use impacts from implementation of the proposed project.

Impacts are considered significant if the proposed project would result in any of the following:

1. Physically divide an established community
2. 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.

3.10.5 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the proposed project physically divide an established community?

Impact Discussion

Construction

The proposed project would require demolition of the existing clubhouse, restaurant/bar, pro shop, 52-room hotel, and surface lots. New development would include the construction of an improved golf course and modern practice area, pro shop, learning center, clubhouse, hotel and associated cottages, residential homes, and trail segments. In addition, the proposed project would include the construction of off-site improvements, including the widening of West Hills Parkway from Carlton Oaks Drive southerly to the northerly end of the bridge on West Hills Parkway, new access point to the project site at the intersection of Carlton Oaks Drive and Burning Tree Way, new emergency-vehicle access roadway, and necessary utility improvements to ensure that the project is adequately served by all necessary public utilities. Construction is expected to last approximately 45 months and may require occasional and temporary road closures, but it would not require any permanent closures of roadways or other community-connectivity routes. For the most part, construction activities, including staging, would occur within the project site and would not cause any permanent disruptions or divisions within the surrounding community. Based on the above, construction activities would not physically divide an established community, and construction impacts would be less than significant, and no mitigation would be required.

Operation

The proposed project would not result in division of an established community. For such a division to occur, project elements would need to separate existing residents from currently available facilities/community services. This can occur, for example, where a highway is installed between residences and schools, shopping, or churches.

The proposed project would involve redevelopment of the Carlton Oaks Country Club and Resort with a redesigned 18-hole golf course, clubhouse, and hotel. In addition, the project would involve construction of new accessory residential uses within two areas of the resort: Residential West with 86 detached multifamily units, and Residential North with 150 detached multifamily residential units, six single-family lots, and the one existing single-family home. As previously discussed, areas directly north are currently developed with residential land uses that would be compatible with the residential accessory uses that would be built as a part of the project.

The project would not construct new major roadways, and no existing pathways or travel routes would be eliminated. Proposed roadways would connect, rather than separate, the project site from established communities in the vicinity. As discussed above, Residential West would be connected to the existing public roadway, West Hills Parkway, by the construction of a private roadway through property currently owned by the City of San Diego. Carlton Oaks Drive would provide direct access to Residential North and the golf course/resort via a single driveway location

at the Burning Tree Way intersection. The public has historically taken formal access through this portion of the site to the golf course facilities, including the existing hotel.

Two emergency access points would also be provided. The first emergency access point would be provided via an extension of Private Drive “C” westerly to West Hills Parkway. West Hills Parkway would be widened within the existing right of way (ROW) from Carlton Oaks Drive, approximately 700 feet south of the existing bridge, to provide a dedicated left-turn lane into Residential West. This emergency access would be 26 feet wide with curb and gutter and asphalt concrete pavement and base, with grades, horizontal alignment, and turnarounds that meet the City of Santee’s Fire requirements. This emergency access point would also be gated and would not be open to the public except during times of emergency. The second emergency access would be from the existing private driveway at the Vista del Verde condominiums to the east. A 26-foot-wide private emergency access road for the Residential North and resort parcels would be provided through the existing Vista del Verde condominiums located in the northeastern corner of the project site. A new fence with an emergency access gate would be erected at the boundary line between the project and the Vista del Verde condominium property. This emergency access road would also meet the City of Santee’s Fire requirements.

The primary evacuation routes, accessed from internal project roadways, lead to Carlton Oaks Drive, West Hills Parkway, Carlton Hills Boulevard, Mission Gorge Road, Cuyamaca Street, and Mast Boulevard. These roads provide access to urbanized areas and major traffic corridors, including SR-125 and SR-52.

The planned public facilities proposed by the project (trail segments) may provide a point of cohesion and a place for surrounding residents to use. Except for four new utility poles, all major water and sewer lines would be located underground and within existing/proposed roadways, and other utilities (e.g., gas, electric) would tie in to existing off-site facilities and be located underground within the project site. These improvements, including the widening of West Hills Parkway from Carlton Oaks Drive southerly to the northerly end of the bridge on West Hills Parkway, would not introduce a physical or visual barrier with the community.

Therefore, impacts related to division of an established community would be less than significant, and no mitigation would be required.

Impact Determination

Implementation of the proposed project would not divide an established community. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would implementation of the proposed 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?

Impact Discussion

The following discussion addresses the project's consistency and/or potential conflicts with the applicable policies of Gillespie Field ALUCP (ALUC 2010), FEMA's National Flood Insurance Program, SANDAG's 2021 Regional Plan (SANDAG 2021), the City of Santee's *General Plan*, City of Santee Municipal Code, City of San Diego's *General Plan* (City of San Diego 2024), City of San Diego's Municipal Code, the *East Elliot Community Plan* (City of San Diego 2015), and the *San Diego River Park Master Plan* (City of San Diego 2013a).

Gillespie Field and MCAS Miramar ALUCPs

Impacts related to airport safety hazards are discussed in further detail in Section 3.8, Hazards and Hazardous Materials. The project site is located approximately 1.5 miles north/northwest of Gillespie Field, and is within the boundaries of the AIA Review Area 2 and the Overflight Notification Area as determined by the ALUC. A portion of the project site in the northeastern area is within the AIA Review Area 2 and Overflight Notification Area for MCAS Miramar. The Gillespie Field and Miramar ALUCPs state that any proposed objects greater than 35 feet tall within Review Area 2 are subject to ALUC review. The tallest building proposed as part of the project is the hotel building, which would be two stories and approximately 38 feet high. Construction activities may require a crane that could be up to 60 feet tall. Additionally, the project would require the installation of four new utility poles in the off-site improvement area, each of which would be up to approximately 45–55 feet in height. Two utility poles would be placed within the public ROW on Carlton Oaks Drive and one utility pole would be placed in the public ROW on Burning Tree Way. In addition, an existing stub pole and anchor would be removed from the ROW in front of 8726 Carlton Oaks Drive and a new utility pole would be placed on the southeastern portion of their driveway.

Because the project site is located within the AIA for two airports, and the proposed project would include temporary construction cranes, installation of new utility poles, and the operation of a two-story building, Section 3.8 identified the potential for the proposed project to exacerbate an existing safety hazard for people residing or working within the vicinity of the project site. The project proponent obtained FAA approval (Appendix I) and will need ALUC review prior to any construction. Therefore, the project would be consistent upon receiving such approval, reducing impacts to a less-than-significant level, and no mitigation would be required.

FEMA Flood Insurance Program

The majority of the project site is within the FEMA-designated Special Flood Hazard Area (SFHA) for areas subject to inundation by the 1% annual-chance flood (FEMA 2012) and would be subject to regulations imposed on lands in special flood hazard areas. As discussed in Section 3.9, Hydrology and Water Quality, FEMA has designated the project site as Zone AE, which is a high-risk flood area having at least a 1% chance of flooding (see Figure 3.9-2 in Section 3.9). Any development occurring with the flood zone would need to be elevated above flood levels.

Grading adjustments would occur as part of the proposed project in order to elevate some portions of the project site and lower other portions to ensure that all structures would be located outside of the floodplain once the project is completed. Because of the grading activities that would occur within the floodplain, which would include the placement of fill within the floodplain and floodway to raise the development areas above the 100-year flood levels, revisions to the flood map would be required and a Conditional Letter of Map Revision (CLOMR) and Letter of Map

Revision (LOMR) must be approved by FEMA to revise the flood mapping at the project site. Because there is a potential for new development to be placed within the regulatory floodway and floodplain limits, a potentially significant impact was identified in Section 3.9 (**Impact HYD-1**). However, implementation of **Mitigation Measure (MM) HYD-1** would require approval of a CLOMR prior to the issuance of any grading permits and LOMR prior to issuance of structural building permits, which would ensure that all structures are raised out of the floodplain and would not be at risk for damage related to floods. Therefore, with approval of the CLOMR and LOMR, the project would not conflict with federal regulations related to flooding and impacts would be less than significant. In addition, as documented in Section 3.9, the project would also be consistent with local policies related to flooding (i.e., City of Santee Flood Damage Prevention Ordinance). In accordance with the City of Santee Flood Damage Prevention Ordinance, the proposed project would ensure that all structures are raised out of the floodplain, implement measures to eliminate scour and erosion on slopes adjacent to floodways, design all service facilities to prevent water from entering or accumulating within the components during conditions of flooding, and be certified by a licensed and experienced professional engineer. Therefore, impacts would be less than significant, and no mitigation would be required.

City of San Diego Environmentally Sensitive Land Regulations

The proposed project's consistency with the City of San Diego's ESL Regulations is discussed in more detail in Appendix E. No impacts would occur on City of San Diego ESL wetlands as a result of the project. Within the project site, potential City of San Diego ESL wetlands are demarcated as avoidance areas and would not be redeveloped or affected. The ESL defines *sensitive biological resources* as those lands included within the Multiple-Habitat Planning Area (MHPA) identified in the City of San Diego's *Multiple Species Conservation Program (MSCP) Subarea Plan* (City of San Diego 1997). The MHPA exists within the proposed project and covers 12.86 acres of golf course and 0.33 acre of avoided riparian habitat. No sensitive habitat would be affected within the City of San Diego MHPA, and no mitigation would be required.

Consistency with Local Plans and Policies

The project site consists of areas designated P/OS, PD, and R-2 in the City of Santee's *General Plan*. The PD designation allows for mixed-used development, including employment parks, commercial, recreational, and various densities of residential uses. This designation is intended for select properties within the City of Santee where a variety of development opportunities may be viable and where the City of Santee wishes to encourage innovative and very high-quality development in a manner that may not be possible under standard land use designations and their corresponding zones. The P/OS designation allows recreational uses, such as golf courses, and with customary support facilities, such as country clubs. Within the R-2 zone, the project proposes: (1) public ROW vacation for existing Inwood Drive and revised driveway access to the existing home at 9225 Inwood Drive (no changes to the existing structure are proposed); and (2) construction of one single-family home on a minimum of 6,000-square-foot lot that would be consistent with the underlying R-2 zone. Together these designations make up the area defined as the Carlton Oaks Country Club property in the City of Santee's *General Plan*.

Most of the residential uses would be located within the PD-designated portion of the project site within the City of Santee. The City of Santee's *General Plan* allows such uses as an accessory use to primary recreation use for the Carlton Oaks Country Club property. Residential uses are also a permitted use under the PD zoning designation. Consistent with the City of Santee's *General Plan*, locating residential uses in the designated PD areas is compatible with the existing adjacent residential uses due to similar public service and site planning needs. (One residential unit will be constructed in the R-2 zone, and one existing home will remain in the R-2 zone.) The Carlton Oaks Country Club facilities would be relocated to the P/OS area within the City of Santee that is designated in the City

of Santee’s *General Plan* to allow the facility/resort to be fully integrated into the golf course. A CUP for the country club and hotel would be required for the underlying P/OS zoning designation.

The City of Santee’s *General Plan – Land Use Element* provides further guidance regarding the development of the Carlton Oaks Country Club property. Specifically, the General Plan states that the project would be developed according to a master development plan consistent with seven Guiding Principles. A review of the seven City of Santee *General Plan* Guiding Principles is provided in Table 3.10-1.

Approximately 64.2 acres of the project site are located within the City of San Diego and would remain with the same use, the redesigned golf course. The portion of the project site within the City of San Diego is designated as Park, Open Space and Recreation in the City of San Diego’s *General Plan* and zoned as Residential-Single Unit (RS1-8 (City of San Diego 2024).

Table 3.10-1 summarizes the relevant policies of local land use plans that have been evaluated for consistency with the proposed project. Many of the goals and policies relevant to the proposed project are concerned with potential flooding hazards and protection of natural and biological resources in the project area, including San Diego River. As detailed in Table 3.10-1, the proposed project would be consistent with all goals and policies identified for the purposes of avoiding or mitigating environmental effects.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
SANDAG 2021 Regional Plan	
<p>Land Use and Regional Growth: In accordance with SB 375, the Regional Plan includes five building blocks that are accompanied by strategies to move the San Diego region toward sustainability and to reduce greenhouse gas emissions.</p> <p>The five building blocks include the following:</p> <ol style="list-style-type: none"> 1. A land use pattern that accommodates our region's future employment and housing needs, and protects sensitive habitats, cultural resources, and resource areas. 2. A transportation network of public transit, managed lanes and highways, local streets, bikeways, and walkways built and maintained with reasonably expected funding. 3. Managing demands on our transportation system (also known as Transportation System Management, or TSM) in ways that reduce or eliminate traffic congestion during peak periods of demand. 4. Managing our transportation system (also known as Transportation System Management, or TSM) through measures that maximize the overall efficiency of the transportation network. 5. Innovative pricing policies and other measures designed to reduce the number of miles people travel in their vehicles, as well as traffic congestion during peak periods of demand. 	<p>Consistent. The proposed project would be consistent with the five building blocks of the policy:</p> <ol style="list-style-type: none"> 1. The proposed project would be consistent with the City of Santee's <i>General Plan – Land Use Element</i> (City of Santee 2003a) and their Sixth Cycle (2021–2029) Housing Element (City of Santee 2022). The City of Santee's Housing Element establishes a balance between the City of Santee's future employment and housing needs. The proposed project would develop the project site as a mixed-use, recreation-related development that would provide employment and recreational opportunities as well as much needed housing. Additionally, the proposed project would be consistent with the City of Santee's <i>General Plan – Land Use Element</i> (City of Santee 2003a), which protects sensitive habitats, cultural resources, and resource areas within the City of Santee. The golf course would retain more than 24 acres of existing natural areas on the site, which would remain untouched. Several riparian areas throughout the project site, which would be planted with native riparian grasses, reeds, and shrubs to provide an environment for native birds, small animals, and aquatic plant and animal species. Therefore, the proposed project would be consistent with the first building block of the policy. 2. The proposed project's transportation network, including the adjacent mobility element roadways, pedestrian network, bicycle network, and transit network, are consistent with the City of Santee's <i>General Plan – Mobility Element</i> (City of Santee 2017) as well as SANDAG's 2021 Regional Plan (SANDAG 2021). A public multipurpose trail would be provided on the property on the northern side of San Diego River, linking with existing and planned trails to the east and west of the site (Project Trail Segment). The portion of the Project Trail Segment on the eastern side of the project site would link to the existing Mast Park West Trail and the SANDAG-planned Carlton Oaks Golf Course Segment trail. The portion of the Project Trail Segment on the western side of the project site would also link to this planned trail. Also, on the western side of the project site, a graded bench and road crossing approximately 423 feet in length would be provided along the Residential West boundary within the Cities of San Diego and Santee. Therefore, the proposed project would be consistent with the second building block of the policy. 3. New transportation demand management (TDM) measures would be implemented by the proposed project to reduce vehicular demand traveling to and from the project site. The proposed project would implement nine TDM measures, as follows: <ol style="list-style-type: none"> a. Voluntary Employer Commute Program b. Employer Carpool Program c. Employer Transit Pass Subsidy

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	<ul style="list-style-type: none"> d. Employer Vanpool Program e. Mixed-Use Development f. Parking Pricing g. Parking Cash Out h. Bikeshare i. Community-Based Travel Planning <p>These TDM measures are proposed to reduce the project's VMT by incentivizing their patrons to use a different form of travel other than driving their vehicle. Therefore, the proposed project would be consistent with the third building block of the policy.</p> <p>4. The proposed project would not be located along a roadway that has been identified as a Complete Corridor within SANDAG's 2021 Regional Plan, in which the TSM strategies and infrastructure would be deployed. Therefore, it should not change or affect SANDAG's TSM strategy, nor the Complete Corridors strategy identified within the 2021 Regional Plan. However, the proposed project would coordinate with the City of Santee, City of San Diego, and SANDAG on any traffic signal modifications resulting from project construction and determine if the improvements/changes are consistent with the TSM program. Thus, the proposed project would remain consistent with the fourth building block of the policy.</p> <p>5. The proposed project would be located directly adjacent to a Regional Mobility Hub and includes strategies to reduce VMT, including subsidizing transit passes for its employees, providing a bicycle-share program for hotel guests, implementing and incentivizing a vanpool program for employees, and implementing a community-based travel plan for its residents. By incorporating residential uses in the Carlton Oaks Country Club redesign, residents would be able enjoy recreation where they live. Residents would be able to access the recreational and commercial uses at the Carlton Oak Country Club and golf course by a multiuse path and sidewalks designed for pedestrian and bicycle use. These measures would help to reduce the overall number of vehicular trips and VMT created by the proposed project, particularly during peak travel times; thus, the proposed project would be consistent with the fifth building block of the policy.</p>
<p>Housing: California is experiencing a housing crisis, with housing demand far outstripping supply. The 2021 Regional Plan addresses the housing crisis through Mobility Hubs, bringing where people live and work closer together and providing more housing options for more San Diegans through increased density. SANDAG will rely on building</p>	<p>Consistent. The proposed project would provide high-quality housing opportunities for existing City of Santee residents and residents in surrounding areas that help satisfy the housing needs of the City of Santee and the region as a whole. The City of Santee does not have an inclusionary housing ordinance but provides a range of housing options for varying income levels. The median home sale price in the City of Santee was lower than the median for San Diego County and the City of San Diego (City of Santee 2022). The proposed project would provide a development that complements the adjacent residential neighborhoods and surrounding areas, by focusing on infill</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>strong partnerships with local jurisdictions to increase housing in the region, especially housing available to low-income residents. Through grant programs and technical support, SANDAG will serve as a funding partner and resource to assist local jurisdictions in reaching the region's housing production goals.</p> <p>While affordable housing has been concentrated in many disadvantaged communities, the goal of this policy is to ensure fairness throughout the region and to not overburden select communities. Providing adequate housing near employment areas can shorten trips and help reduce pollution exposure, but existing deficiencies in communities should be considered before new housing is added. SANDAG is studying ways to accelerate housing production without displacing low-income residents in communities where housing growth occurs and will increase equity in the region by furthering fair housing in resource-rich areas to provide low-income residents with greater access to jobs, educational opportunities, and other resources.</p>	<p>development that efficiently utilizes available space. The proposed project would be located along Carlton Oaks Drive, a major roadway corridor that provides service for the 834 Bus Line (i.e., the West Santee Loop and the Sycuan Greenline), which would be a part of San Diego's Metropolitan Transit System (MTS). Furthermore, the proposed project would be approximately 0.5-mile away from the City of Santee's Town Center, which provides retail and commercial uses.</p>
<p>Climate Action Planning: To help reach regional and state greenhouse gas (GHG) emissions reduction targets, the 2021 Regional Plan focuses heavily on the conversion to clean transportation and a shift from personal vehicle dependency through the 5 Big Moves. To help local jurisdictions make this transition and achieve broader reductions in GHG emissions, SANDAG will provide technical assistance, guidance resources, templates, and grant funding to incorporate the 5 Big Moves and Sustainable Communities Strategy actions into their climate action plans (CAPs) and plan for more</p>	<p>Consistent. The proposed project would align with the SANDAG 2021 Regional Plan's focus on utilizing clean transportation and shifting away from personal vehicle dependency by subsidizing transit passes for its employees, providing a bicycle-share program for hotel guests, implementing and incentivizing a vanpool program for employees, and implementing a community-based travel plan for its residents. The proposed project would also participate in SANDAG's iCommute program to assist project residents and employees with ridesharing for their commute. These programs were designed to encourage carpooling and help achieve the mode-split goals outlined in SANDAG's 2021 Regional Plan. Residents would be able to access the recreational and commercial uses at the Carlton Oak Country Club and golf course by a multiuse path and sidewalks designed for pedestrian and bicycle use. Additionally, the proposed project would be consistent with the policies of the <i>Sustainable Santee Plan</i> (City of Santee 2019), as discussed in more detail below; therefore, it would be consistent with the governing climate action goals and policies.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>well-connected, sustainable, healthy communities that are accessible to all.</p> <p>SANDAG recognizes that all residents, regardless of age, race, or income, deserve to live in safe and healthy communities and that climate impacts disproportionately affect low-income populations and communities of color. SANDAG will consider climate impacts and the equitable distribution of funding and program assistance for all communities across the region.</p>	
<p>Climate Adaptation and Resilience: The San Diego region is anticipated to feel the effects of climate change through hotter and more frequent heat waves, prolonged droughts, increased wildfires, rising sea levels, and destructive storm surges. The 2021 Regional Plan aims to better prepare San Diego communities for these climate change impacts by considering evacuation and rapid mobility needs in our transit corridors, evaluating and considering climate vulnerabilities to the region's transportation infrastructure, and utilizing natural lands and conservation to absorb and protect against climate change impacts.</p> <p>SANDAG will establish a coordinated effort across agencies and local jurisdictions for more holistic, comprehensive, equitable, sustainable, and resilient communities.</p> <p>SANDAG recognizes that climate change affects everyone, with low-income and communities of color disproportionately feeling those effects. Regional resilience is only possible if all communities and populations are prepared. The 2021 Regional Plan seeks to equitably prioritize climate resilience projects and increase public</p>	<p>Consistent. The proposed project would include green building features that have been incorporated into the project design to conserve energy, reduce water use, and reduce GHG emissions. All construction would meet or exceed Title 24 Building Code Regulations. The proposed project also includes 100-foot fuel modification zones to minimize conditions that would support wildfires and raised residential elevations with surrounding open spaces to minimize flood conditions. The proposed project would be consistent with the <i>Sustainable Santee Plan</i> (City of Santee 2019), which contains the governing climate adaptation and resilience goals and policies for the City of Santee.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>awareness of climate change across San Diego County. SANDAG will promote climate resilience projects through the Resilient Capital Grants and Innovative Solutions program, prioritizing communities most vulnerable to the impacts of climate change.</p>	
<p>Electric Vehicles: The adoption of electric vehicles (EVs) regionwide is a key player in the 5 Big Moves of the 2021 Regional Plan as a way to reach regional GHG emission-reduction targets. EVs are zero-emission vehicles that include plug-in battery EVs and hydrogen fuel cell EVs. SANDAG aims to incentivize and encourage the incorporation of all types of EVs into Flexible Fleets, Transit Leap, and goods movement and support funding programs that increase EV charging stations throughout the region and within Mobility Hubs and as part of the Complete Corridor strategy.</p> <p>Regionwide adoption of EVs requires affordable and convenient access to zero-emission options for all residents. The charger incentive program currently reserves a minimum of 25% of funds for installations in disadvantaged communities and will explore increases to this amount through program updates. The vehicle incentive program plans to prioritize rebate funds for low- and moderate-income households. The new regional EV strategy that will be developed through the Accelerate to Zero Emissions Collaboration with regional partners will include engagement with CBOs and address social equity considerations in its purpose, policies, and recommendations. The Collaboration's steering committee also includes representatives from two equity-focused organizations. SANDAG is also committed to</p>	<p>Consistent. The proposed project would include the installation of EV chargers in the clubhouse and resort parking lot. Forty-five percent of all nonresidential parking spaces will be EV capable (132 Spaces), and 33% of these EV capable parking spaces will have EV charging stations (EVCS installed (44 units). In addition, every residential dwelling unit garage (242 units) will have Level 2 Electric Vehicle Supply Equipment (EVSE) installed.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>coordinating with regional stakeholders to accelerate the transition to zero-emission buses and trucks to meet state climate and environmental goals. As SANDAG develops clean transportation pilot projects, benefits accrued to disadvantaged communities will be a factor in determining pilot locations.</p>	
<p>Parking and Curb Management: Proactively managing parking and curb space enables more people to access places within our communities using alternatives to driving. Effective parking-management policies contribute to the region's ability to meet the California Senate Bill 375 (Steinberg, 2008) GHG-reduction targets by applying parking pricing and reduced parking supply assumptions. In addition, the 2021 Regional Plan addresses curb management by proposing strategies to help balance competing and changing travel needs at the curb while remaining flexible to resident, employee, business, and visitor needs. While the authority to implement parking and curb policies remains with local jurisdictions, SANDAG plays a unique role of informing these policies by sharing resources and best practices and serving as the regional Mobility Data Clearinghouse. Proactively managing parking and curb space enables more people to access places within our communities using alternatives to driving.</p> <p>SANDAG considers how parking and curb management can address social equity and how all residents in the San Diego region can benefit from its potential impacts. Such policies can enable affordable housing development and create equitable curb space for all travelers, including those who depend on modes like transit, biking, or</p>	<p>Consistent. As outlined in the proposed project's <i>Transportation Impact Study</i> (Appendix O1) (see TDM Measures 1A, 1D, 1E, 3A, and 3B), the proposed project would implement multiple parking-management strategies, including parking cash-out for employees, transit pass subsidies, a vanpool program, and paid parking for hotel patrons. Additionally, the hotel and resort would implement a shared parking plan to maximize the use of existing parking spaces and minimize the need for additional parking spaces on site. It should be noted that access to the specific uses within the proposed project (i.e., hotel, golf course, and residential units) would be via internal roadways. Additionally, the proposed project would not rely on public on-street parking; therefore, curb management policies and practices would not be relevant to the proposed project.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>other Flexible Fleets. These alternatives to driving alone not only enable less required parking but can also reduce pollution exposure as trips are shifted to cleaner modes. SANDAG will ensure that pricing strategies are implemented in coordination with more convenient and accessible travel choices and mobility incentive programs as they become available.</p>	
<p>Transportation Demand Management: Transportation Demand Management (TDM) innovations have the potential to transform the way people travel within and between communities. Managing demands on the existing transportation system is a vital strategy for making the overall system more effective in reducing solo commute trips. SANDAG will continue to administer and monitor the iCommute program by providing regional rideshare, employer outreach, bike education, and secure parking services to help reduce commute-related traffic congestion and vehicle miles traveled. Beyond commute trips, TDM programs are expanded to include grants and incentives that make it easier and safer to use active modes for short trips.</p> <p>SANDAG recognizes that all residents throughout the region deserve convenient, safe, and affordable commute options and will ensure equitable distribution of funding and incentive program assistance. Additionally, SANDAG commuter programs will design options for low-income or unbanked residents while ensuring marketing, outreach, and education efforts reach underrepresented populations in the region.</p>	<p>Consistent. As outlined in the project's <i>Transportation Impact Study</i> (Appendix O1) (see TDM Measures 1A, 1D, 1E, 4E, and 4G), the proposed project would subsidize transit passes for its employees, provide a bicycle-share program for hotel guests, implement and incentivize a vanpool program for employees, and implement a community-based travel plan for its residents. The proposed project would also participate in SANDAG's iCommute program to assist project residents and employees with ridesharing for their commute. These programs are all designed to encourage carpooling and help achieve the mode-split goals outlined in SANDAG's 2021 Regional Plan.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
Greater participation in TDM programs have great potential for pollution exposure reduction by reducing the number of single-occupant vehicles.	
City of Santee General Plan	
Land Use Element	
Carlton Oaks Country Club 7 Guiding Principles	
1. The development of the Carlton Oaks Country Club property should focus on mixed use recreation-related development, which is oriented towards, and enhances the San Diego River, and is related to other recreation areas within the City.	Consistent. The proposed project would be a mixed-use project that includes residential and recreational uses. The main focal point of the project would be the golf course that meanders along the San Diego River corridor. The associated country club facility would overlook the golf course, providing panoramic views of the course and surrounding open space areas along the San Diego River corridor. The Carlton Oaks Country Club and Resort has been designed in a manner that would enhance the San Diego River by sensitively designing the project around the surrounding natural resource areas. Specifically, the project would widen and enhance the stream course in some areas, increase the functionality of the river, and restore the surrounding vegetation.
2. The property should be focused on a high-quality resort and recreation-related uses. Any residential uses should be accessory, and related to the primary recreation use.	Consistent. The primary focus of the proposed project is to provide high-quality resort and recreation-related uses. The project will redevelop the existing facility into a premier golf resort with a new a hotel and clubhouse. The residential uses would be accessory to the resort and consist of only 19% of the total project site. The residents would provide more economic stability to the resort by activating the facilities and the site year-round, thus ensuring the long-term preservation of the golf course. As a part of living on the site, new Carlton Oaks residents would be provided priority tee times, as well as a regular resident events specially designed as an activity to encourage synergy with the resort and its residents.
3. Ancillary uses, such as restaurants, retail uses, or hotels shall be allowed by Conditional Use Permit if such uses are determined to be ancillary to the existing or planned resort and recreation facilities.	Consistent. The proposed project would seek a CUP for the country club facility and hotel within the area currently designated as open space. Although the golf course could be described as the core of the proposed project, the country club would be a key element of the project and allow more members of the community to enjoy the San Diego River corridor and surrounding open space areas. The country club facility would include a variety of amenities that would be offered to the public, including a restaurant, retail pro shop, and hotel. The amenities would contribute to the project's success as a resort facility and would be consistent with the amenities found at other country clubs in the region. These ancillary uses would allow this facility to be competitive and provide the additional economic base needed for its continued success. The additional

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	amenities would provide the public multiple ways in which to enjoy the open space areas and the golf course.
4. Use of the site should orient to, and be compatible with, the San Diego River.	Consistent. The proposed project has been designed in a manner that would be compatible with San Diego River. No development on the project site would exist within the designated 100-year floodplain in the post-project condition. A CLOMR would be completed that would demonstrate that, if built as proposed, the project would meet minimum federal regulations. The existing drainage patterns and facilities would be modified within the golf course to improve the flow of drainage, which would reduce the amount of ponding that occurs on the site during rain events. The project would not directly affect the main channel of San Diego River. In situations where new residential or commercial land uses are in close proximity to the protected habitat along San Diego River, these areas of the project would follow applicable Land Use Adjacency Guidelines (e.g., appropriate lighting, noise, and public access control). In addition, required best management practices (BMPs) would protect soils from erosion, reduce flood risk, control stormwater, and minimize impacts on any existing natural drainage facilities.
5. Development should respect the river environment, including protection of the riparian habitat and protected species.	Consistent. The golf course redesign considered several factors, including the protection of the surrounding riparian and protected species. Additionally, the proposed project avoids all impacts on the San Diego River channel to the south of the golf course. A Stormwater Pollution Prevention Plan (SWPPP) would include BMPs for minimizing runoff into the river, and trees around the river would be avoided and retained. The project's <i>Biological Resources Report</i> (Appendix E) addresses measures that protect the river environment, including protection of riparian habitat and protected species. Where impacts were identified, measures were proposed to minimize those impacts.
6. Development should protect natural drainages, and ensure protection of water quality.	Consistent. Per the above response, an SWPPP would include BMPs for minimizing runoff into the river and minimize impacts to surface water quality. The proposed updates to the golf course have been thoughtfully designed to follow the contours of the existing natural topographical features of the San Diego River valley. Twelve of the new golf holes would maintain the original contours, and all 18 holes would maintain the characteristics of the existing contours, drainage, and floodway and, most importantly, protect natural drainage patterns. Additionally, these contours would respect the interior Sycamore Creek area that flows thorough the center of the golf course. Most of the proposed grading for the golf course has been designed around the existing natural creek. Only a few limited areas of the creek would be temporarily affected by the construction of the golf course; however, the project proposes to not only restore and enhance these areas, but also widen the natural drainage.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
7. A multipurpose, public trail shall be provided on the property on the north side of the San Diego River, linking with existing and planned trails to the east and west of the site.	Consistent. A public multipurpose trail would be provided on the property on the northern side of San Diego River, linking with existing and planned trails to the east and west of the site (Project Trail Segment). The portion of the Project Trail Segment on the eastern side of the project site would link to the existing Mast Park West Trail and the SANDAG-planned Carlton Oaks Golf Course Segment trail. The portion of the Project Trail Segment on the western side of the project site would also link to this future, planned trail.
Objective 2.0: Allow for development of a wide range of housing types in the City.	
Policy 2.1: The City should promote the use of innovative site planning techniques that contribute towards provision of a variety of residential product styles and designs.	Consistent. The proposed project has been designed to provide a variety of residential products and designs to the PD and R-2 designated areas. Similar to other resorts in the region, that are its competitors, the residential component located in the PD zone would be an accessory and related use to the golf course and the Carlton Oaks Country Club. These residential homes would focus on the Carlton Oaks Country Club and Golf Course, promoting a healthy, recreation-oriented lifestyle that would provide continued economic support year-round to the resort facility. The project would also contribute to the provision of a range of housing types within the City of Santee including 86 detached multifamily residential units within Residential West and 150 detached multifamily residential units within Residential North. In addition, six single-family lots and one existing single-family lot would front Carlton Oaks Drive and allow for single-story homes on 6,000-minimum-square-foot lots. The residential units within Residential West would include a mixture of Modern Spanish, Transitional Monterey, and Transitional Farmhouse designs on pads measuring at minimum 40 by 70 feet. The residential units within Residential North would include a mixture of Modern Farmhouse, Prairie Inspired, and Modern Spanish designs on pads measuring approximately 50 by 46 feet and 47 by 70 feet.
Policy 2.2: The City should encourage the development of higher density residential developments in areas close to a multi-modal transit station and along major road corridors where transit and other convenience services are available.	Consistent. The proposed project would include multifamily housing within the Residential West and Residential North. Residential West and Residential North would have development densities of 9 and 7 dwelling units per gross acre, respectively. The proposed project would be located directly adjacent to a Regional Mobility Hub. The project site is along Carlton Oaks Drive, a major roadway corridor that provides service for the 834 Bus Line (i.e., the West Santee Loop and the Sycuan Greenline), which would be a part of San Diego's MTS. Furthermore, the proposed project would be approximately 0.5 miles away from the City of Santee's Town Center, which provides retail and commercial uses.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>Policy 2.3: The City should encourage planned residential and/or planned unit developments that provide adequate open space, recreational facilities, off-street parking, interior circulation patterns and other amenities and facilities.</p>	<p>Consistent. The residential component of the proposed project would be accessory to the primary recreational uses (i.e., the Carlton Oaks Country Club and Golf Course) and would promote a recreation-oriented lifestyle. The residential development would be connected to the recreational and commercial uses at the Carlton Oaks Country Club and Golf Course by an interconnected system of golf cart paths, a multiuse path, and sidewalks for pedestrian and bicycle use. Housing units and interior streets would provide off-street parking and would be separated into two residential planning areas, each with controlled access to maintain safe interior circulation patterns. The landscaping plan for the proposed project includes additional community recreational and enhanced open space areas in both the western and eastern portions of the project. The western community recreation area would feature a playground, dog run area, artificial turf, picnic tables, bench seating, a trellis shade structure, and shade trees. The eastern recreation areas would feature a pool house, pool, dining tables, lounge seating, a shade structure, shade trees, a planting area, playground, putting green, chipping area, and bench seating.</p>
<p>Objective 3.0: Provide and maintain the highest level of service possible for all community public services and facilities.</p>	
<p>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,</p>	<p>Consistent. The City of Santee has a variety of ordinances, policies, and Development Impact Fees to provide infrastructure improvements within the City of Santee. The project would be required to meet all applicable City of Santee requirements for dedications and pay all applicable fees associated with public services.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
economic (job creation, secondary economic benefits, etc.) and environmental factors.	
Policy 3.2: The City should consider the use of public / private partnerships when appropriate to facilitate introduction of desirable and innovative development within the City.	Not Applicable. This policy would be directed at the City of Santee, and implementation of the proposed project would not impede or conflict with this policy.
Policy 3.5: The City shall require the placement of utility lines underground where feasible.	Consistent. New utility lines serving the development, as well as utility lines along Carlton Oaks Drive, would be placed underground.
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.	Consistent. The project site would be located in an area that currently includes a golf course. The proposed project includes necessary off-site improvements to ensure that the project can be adequately served by all necessary public utilities, including Padre Dam Municipal Water District (PDMWD), Santee Waste Management, and San Diego Gas and Electric. Off-site utility improvements include installing new PDMWD water mains and extending a PDMWD water main, potable and recycled water pipelines, and drainage channels into the project site.
Objective 6.0: Ensure that natural and human-induced hazards are adequately addressed in the location and intensity of development in the City.	
Policy 6.2: The City should promote the use of innovative site planning to avoid on-site hazards and minimize risk levels.	Consistent. The proposed project would enhance San Diego River because it was designed to complement the surrounding natural resource areas. Specifically, the project would widen and enhance the stream course in some areas, increase the functionality of the river, and restore the surrounding vegetation. Other areas of the golf course would be graded at a lower elevation to further increase the flows within the river area. The project site would be located within the regulatory limits of San Diego River (i.e., the floodplain and floodway), and the proposed grading for the golf resort would occur within the regulatory floodway. However, no development on the project site would occur within the designated 100-year floodplain in the post-project condition. A CLOMR would be completed prior to grading permit issuance that would demonstrate that, built as proposed, the project would meet minimum federal regulations.
Objective 7.0: Undertake development of large, contiguous, vacant or underutilized parcels in a comprehensive manner.	
Policy 7.1: The City shall utilize and initiate, in appropriate locations the use of comprehensive planning process for development of large landholdings. Appropriate locations shall include large contiguous vacant or underutilized parcels (i.e., 10 acres or larger in area) under single	Consistent. To guide the planning of the proposed project, a master development plan was developed that includes a comprehensive redesign of the existing, underutilized Carlton Oaks Golf Course to include new residential uses and a redeveloped golf resort with a hotel and clubhouse. The existing golf course would be redesigned to move the resort hotel, clubhouse, and associated facilities to the eastern-central area of the project site, which is currently occupied by the existing golf course. New multifamily residential units (86 units) would be constructed in Residential West,

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>ownership that contain unique resources such as a hillside or watercourse, where a combination of uses are proposed on the site or where phased implementation of the development is necessary to minimize the impact on the City. If a comprehensive planning process involves multiple ownerships, the plan should apply to the total area of these ownerships.</p> <p>For smaller contiguous vacant or underutilized parcels (i.e., less than 10 acres in area), a comprehensive planning process should be considered to allow for the comprehensive development of the land.</p>	<p>and 150 new multifamily and 6 single-family residential units would be constructed in Residential North. The driveway modification for the existing single-family home is not relevant to this policy.</p>
<p>Policy 7.2: A comprehensive development plan shall be prepared prior to approving any subdivision of land or land development proposal unless the Director of Development Services makes a determination that the subdivision would not have a significant effect on the ultimate development of the property.</p>	<p>Consistent. The proposed project contains a comprehensive development plan that intends to accomplish the following:</p> <ul style="list-style-type: none"> • Provide a high-quality resort facility that offers a full-service hotel, premier golf course, and event facility that offers outstanding recreational opportunities. • Redesign and substantially improve the underutilized golf course with a professionally designed layout that allows the golf course to meet the needs of the local City of Santee community, as well as the broader tourism needs, to ensure that it would be economically viable into the future. • Provide high-quality housing opportunities for existing City of Santee residents and residents in surrounding areas that help satisfy the housing needs of the City of Santee and the region as a whole, and a development that complements the adjacent residential neighborhoods and surrounding areas, by focusing on infill development that efficiently utilizes available space. • Develop multifamily residential areas with nearby access to recreational uses, service amenities, and support resources. • Design a development that complements and enhances the visual character of the area through thoughtful and visually pleasing architectural design. • Promote the use of the San Diego River Trail, which provides access to Mission Trails Regional Park to the west and the Santee Town Center to the east, by designing the proposed project to complement the San Diego River Trail both functionally and aesthetically, including by providing direct access for users of the trail.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	<ul style="list-style-type: none"> • Provide additional economic revenue for the City of Santee and County of San Diego through the generation of sales, transient occupancy, and property taxes through additional event facilities, hotel units and residential units. • Invigorate the local economy by providing additional employment and business opportunities associated with the design, construction, and operation of the proposed project.
Objective 8.0: Minimize land use conflicts and maximize mutual benefits between adjacent land uses in the City.	
Policy 8.3: The City should encourage an innovative mix of land uses when such a mix could enhance the viability of development and provide for common public services and site planning requirements.	Consistent. The proposed project would be proposed as a recreation-oriented, mixed-use infill development that would include two residential neighborhoods, a hotel, restaurants, retail, and redesigned golf course. The proposed project would provide the innovative approach of integrating the residential uses with the golf course and resort to make the facilities readily accessible to the homeowners. In turn, the homeowners would provide economic vitality to the Carlton Oaks Country Club and Resort by activating the facilities and the site year-round, further ensuring the long-term preservation of the golf course.
Policy 8.4: The City should consider the Adjacent Land Use Compatibility Guide chart to assist in an initial determination of overall land use compatibility for adjacent land uses.	Consistent. According to the City of Santee's <i>General Plan – Adjacent Land Use Compatibility Guide Chart</i> (City of Santee 2003) the proposed project's single-family and multifamily residential and commercial components are categorized as being compatible with inclusion of typical site planning features (i.e., project design features) or having potential incompatibilities that can fully mitigated by site planning features in relation to the surrounding single- and multifamily residential uses. Based on the chart, the proposed project has no land use incompatibilities "that often can only be partially mitigated by site planning features." Further, as discussed under Threshold 2, locating residential uses in the designated PD areas is compatible with the existing adjacent residential uses because of similar public service and site planning needs.
Policy 8.5: The City shall strive to minimize direct and indirect impacts on existing or planned preserved open space from adjacent development.	Consistent. Because the proposed project would be surrounded by sensitive habitats and preserves to the east and south, its design includes avoidance and minimization measures to reduce direct and indirect impacts on adjacent open space. Project lighting would be shielded and directed away from San Diego River to avoid spillover into the adjacent riparian habitat. New development areas have been designed to drain into on-site water-detention basins and not flow into the habitat preserves. Additionally, a qualified biologist would provide construction monitoring, environmentally sensitive areas would be protected with fencing prior to construction, and a maximum speed limit of 25 miles per hour during construction would be enforced. See Section 3.3, Biological Resources, for a complete list of mitigation measures included as part of the proposed project.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
Objective 9.0: Minimize land use conflicts between land uses in adjacent areas and existing planned land uses in the City.	
Policy 9.1: The City should encourage the City of San Diego to protect vacant lands in the East Elliot area along the City's western boundary as part of a regional biological preserve system.	Not Applicable. The project site does not include vacant lands in the East Elliot area along the City of Santee's western boundary. The portion of the project site within the City of San Diego is currently a golf course and would be redeveloped as a golf course under the proposed project.
Objective 10.0: Provide for the reasonable and logical future growth of the City.	
Policy 10.1: The City should actively pursue annexation of the land currently under the jurisdiction of the City of San Diego, which is located along the San Diego River at the western City limits to the Mission Trails Regional Park, and in the East Elliot area on the City's western boundary.	Not Applicable. This land use policy would be directed toward the City of Santee. Implementation of the proposed project would not impede or conflict with this policy.
Policy 10.2: The City should cooperate with adjacent jurisdictions in establishing a Sphere of Influence.	Not Applicable. This land use policy would be directed toward the City of Santee. However, the proposed project would not require modifications to, or the establishment of, a sphere of influence.
Objective 11.0: Ensure that development in the City is consistent with the overall community character and contributes positively towards the City's image	
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 further in Section 3.1, Aesthetics and Visual Resources, of this EIR, the proposed project would comply with the requirements set forth in the City of Santee's <i>General Plan – Community Enhancement Element</i> (City of Santee 2003g) because the project would not significantly affect scenic views or resources, would be designed to enhance San Diego River, and would avoid and minimize impacts on natural resources, minimize impacts of grading, and include an interconnected system of paths, sidewalks, and streets that would connect residential areas to the existing facilities. Additionally, the proposed project would be consistent with the <i>San Diego River Park Master Plan</i> , as discussed below.
Policy 11.2: The City should maintain, and update as needed, the design standards for landscaping and site planning to provide guidelines for future developments.	Not Applicable. This land use policy would be directed toward the City of Santee. Implementation of the proposed project would not impede or conflict with this policy. The proposed project would be consistent with the development standards for each zoning district as well as the 7 Guiding Principles set forth for the Carlton Oaks property.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
Housing Element	
Objective 5.0: Encourage the provision of a wide range of housing by location, type of unit, and price to meet the existing and future needs of Santee residents to the maximum extent possible.	
Policy 5.1: Provide a variety of residential development opportunities in the City, ranging in density from very low density estate homes to medium-high and high density development.	Consistent. The proposed project would provide a variety of residential developments, including 86 detached multifamily residential units in Residential West and 150 detached multifamily residential units and six single-family residences (plus a driveway modification to one existing single-family home) within Residential North. The proposed project would introduce multifamily residential units to an area of Santee that currently has single-family units. However, the average residential unit density within the PD would be between 8.2 and 9 units per acre, consistent with the densities of the surrounding R-7 land use district. The proposed project would consist of multiple detached residential units located within single parcels in which the underlying land would be held in common ownership.
Policy 5.4: Encourage developments of new housing units designated for the elderly and disabled persons to be in close proximity to public transportation and community services.	Consistent. Residences associated with the proposed project would accommodate a variety of demographics, including elderly and disabled people, with Americans with Disabilities Act-compliant access. Residences would be developed along and near Carlton Oaks Drive, which would be a major roadway corridor that provides service for the 834 Bus Line (the West Santee Loop and the Sycuan Greenline), which would be a part of the County of San Diego's MTS. Furthermore, the proposed project would be approximately 0.5-mile away from the City of Santee's Town Center, which provides retail and commercial uses.
Policy 5.5: Ensure that all new housing development and redevelopment in Santee is properly phased in amount and geographic location so that City services and facilities can accommodate that growth.	Consistent. The project site is in an area of the City of Santee that currently includes a golf course and adjacent residential uses. The project includes necessary off-site improvements to ensure that it would be adequately served by all necessary public utilities, including PDMWD, Santee Waste Management, and San Diego Gas and Electric. Off-site utility improvements include installing new PDMWD water mains and extending a PDMWD water main, potable and recycled water pipelines, and drainage channels into the project site. Housing construction would be phased and would occur over the course of approximately 22 months.
Mobility Element	
Objective 5.0: Allow parking reductions around transit and affordable housing.	
Policy 5.2: The City should maximize shared parking opportunities for uses with varied peak parking periods.	Consistent. The hotel and resort portion of the project would implement a shared parking plan to maximize the use of existing parking and minimize the need for additional parking spaces provided on site.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
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.	Consistent. The proposed project would include an interconnected system of golf cart paths, a multiuse path, sidewalks to connect resort facilities and residential areas, and ingress/egress connections that would accommodate linkages planned by SANDAG (i.e., the San Diego River Trail) and the City of Santee. In addition, all parkways would be landscaped with a combination of trees, shrubs, and groundcover.
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.	Consistent. As outlined in the project's <i>Transportation Impact Study</i> (Appendix O1) (see TDM Measures 1A, 1D, 1E, 4E, and 4G), the proposed project would subsidize transit passes for its employees, implement and incentivize a vanpool program for employees, and implement a community-based travel plan for its residents. The proposed project would also participate in SANDAG's iCommute program to assist project residents and employees with ridesharing for their commute.
Policy 9.3: The City should encourage employers to offer shared commute programs and/or incentives for employees to use transit.	Consistent. As outlined in the project's <i>Transportation Impact Study</i> (Appendix O1) (see TDM Measures 1A, 1D, 1E, 4E, and 4G), the proposed project would subsidize transit passes and implement and incentivize a vanpool program for employees. The proposed project would also participate in SANDAG's iCommute program to assist employees with ridesharing for their commute.
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.	Consistent. As outlined in the project's <i>Transportation Impact Study</i> (Appendix O1) (see TDM Measures 1A, 1D, 1E, 4E, and 4G), the proposed project would subsidize transit passes for its employees, provide a bicycle-share program for hotel guests, implement and incentivize a vanpool program for employees, and implement a community-based travel plan for its residents. The proposed project would also participate in SANDAG's iCommute program to assist project residents and employees with ridesharing for their commute. In keeping with the Safe Routes to School Plan (SANDAG 2012), the nearest school to the proposed project, Carlton Oaks Elementary School, would be accessible from the proposed project by walking, biking, or public transit. The proposed project would also include an interconnected system of golf cart paths, a multiuse path, and sidewalks connecting resort facilities and residential areas, and ingress/egress connections that would accommodate linkages planned by SANDAG (i.e., the San Diego River Trail) and the City of Santee.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
Recreation Element	
Objective 2.0: Provide adequate recreational acreage and facilities in all areas of the City.	
Policy 2.2: The City shall encourage the inclusion of recreational facilities in all mixed land use developments, especially within the Town Center and Fanita Ranch.	Consistent. The landscaping plan for the proposed project includes additional community recreation and enhanced open space areas in both the western and eastern portions of the project, as described above. The proposed mixed-use development would also include a golf course, clubhouse, swimming pools, playgrounds, picnic areas, and a dog run.
Policy 2.5: The City should require the inclusion of private recreation areas in all Planned Residential Developments.	Consistent. The landscaping plan for the proposed project includes additional community recreation and enhanced open space areas in both the western and eastern portions of the project, as described above. The proposed mixed-use development would also include a golf course, clubhouse, swimming pools, playgrounds, picnic areas, and a dog run for residents, members, and guests.
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.	Consistent. The proposed project would enhance San Diego River because it was designed to complement the surrounding natural resource areas. Planting native species around the riparian buffer would enhance the natural features of the area and support water-management goals by providing erosion control and a filtration system for urban runoff. As discussed further in Section 3.1, Aesthetics and Visual Resources, of this EIR, the renovation of the golf course and construction of the country club and hotel would not significantly affect scenic views or resources. The project would widen and enhance the stream course in some areas, increase the functionality of the river, and restore the surrounding vegetation. Other areas of the golf course would be graded at a lower elevation to further increase the flows within the river area. The project site would be located within the regulatory limits of San Diego River (i.e., the floodplain and floodway), and the proposed grading for the golf resort would occur within the regulatory floodway. However, no development on the project site would occur within the designated 100-year floodplain in the post-project condition. Prior to grading permit issuance, a CLOMR would be completed that would demonstrate that, built as proposed, the project would meet minimum federal and City of Santee regulations. The direct and indirect impacts of the proposed project on biological resources associated with these drainage areas would be mitigated, as written in the <i>Biological Resources Report</i> (Appendix E), through avoidance, minimization, and mitigation measures. Measures include implementing a Restoration Plan, Resource Management Plan, and SWPPP that identify and protect environmentally sensitive areas, having a qualified biologist provide construction

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	monitoring, enforcing a maximum 25-mile-per-hour speed limit during construction, minimizing indirect noise impacts on riparian birds, avoiding disturbance of vegetation during the bird-nesting season, and mitigating impacts by purchasing mitigation bank credits or creating new habitat.
Policy 2.2: The City should promote open space in conjunction with other appropriate land uses along the San Diego River corridor and other water corridors found in the City.	Consistent. The proposed project would retain 104 acres of the existing golf course as open space. In addition, the proposed residential developments would include approximately 30,000 square feet of community recreation space.
Policy 2.4: The City should promote the design and use of floodways and adjacent land for recreation whenever appropriate as part of flood control and habitat improvements.	Consistent. Within the project site, San Diego River would be adjacent to the southern section of the golf course, which would remain a golf course as part of the proposed project. The project would also include floodway improvements within the project site to expand the function of existing drainage facilities and reduce areas of flooding.
Policy 2.5: The City should avoid concrete channelization of waterways whenever possible and promote alternative flood control designs which have open space value.	Consistent. Channelization of waterways would be avoided wherever possible. Where channelization does occur, it would reduce existing on-course ponding during rain events by extending the storm drain system (via subsurface pipelines) to outlet closer to appropriate watercourses. The concrete outlet currently located on site would be removed.
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.	Consistent. Per the <i>Preliminary Flood Study</i> (i.e., the CLOMR; Appendix L), proposed development would be consistent with FEMA and City of Santee flood elevations. The proposed project would not directly affect the main channel of San Diego River. The proposed project would include flood-control improvements along San Diego River (North Channel). These flood-control improvements would maintain the existing functions and values of San Diego River (North Channel) and allow for both improved flood control and maintenance of natural habitat. The site would be designed to avoid hazards and minimize risk levels by remapping the existing floodway so that the pad would not lie within it. Additionally, the pad elevation would meet the City of Santee's design codes, which are more stringent than FEMA's. The proposed development and grading would not alter the existing flood conditions upstream or downstream of the project. The proposed secondary emergency access roads would not be located in the 100-year floodplain.
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.	Consistent. Per the <i>Preliminary Flood Study</i> (i.e., the CLOMR; Appendix L), the floodway would be remapped, and the proposed development would not occur within the floodway. All development would be consistent with the City of Santee's Flood Damage Protection Ordinance. Of specific note would be City of Santee Municipal Code 11.36.200A, which prohibits encroachment, fill, and construction unless a registered professional engineer demonstrates that these improvements would not increase the flood elevation. Per the <i>Preliminary Flood Study</i> (i.e., the CLOMR; Appendix L), the floodway would be remapped so that the development would be not within the floodway,

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	and the flood elevation would not increase. The proposed project also meets all standards for subdivisions per City of Santee Municipal Code 11.36.180.
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.	Consistent. The Landscape Plan uses a plant palette composed of low-water use/drought-tolerant plants. Specifically, at least 90% of the plant materials selected for non-turf areas would be drought tolerant and require minimal water once established. All turf areas would be warm-season or drought-tolerant turf adaptable for the region. The new golf course design would significantly reduce the areas to be irrigated and use a modern, efficient irrigation system. Only approximately 66 acres of turf irrigation would be needed in the new course design, resulting in a 50% decrease of irrigated areas and a 61% decrease in water usage.
Policy 3.2: The City shall encourage the development and utilization of innovative water conservation measures in all proposed developments.	Consistent. Irrigation systems would be designed so that valves and watering circuits are separated based on water usage of different plants and would be equipped with a rain-shutoff device. Low-volume systems would be used, including low-volume nozzles in sprinkler heads, low-volume bubblers, and/or drip emitters. Sprinkler heads would be spaced appropriately to avoid runoff and eliminate overspray into non-landscaped areas. Additionally, low-flow toilets, faucets, and shower heads would be used in the development of the golf course, clubhouse, hotel, and residences.
Objective 4.0: Reduce the amount of erosion of soil in the City.	
Policy 4.1: The City shall require that appropriate soils and geologic surveys be completed for all proposed development, consistent with the policies and implementation measures found in the Safety Element.	Consistent. Geocon conducted geotechnical investigations within the project site (Appendices G1 and G2), consistent with the implementation measures in the City of Santee's <i>General Plan – Safety Element</i> (City of Santee 2003f). The geotechnical investigation met the requirements for the level of geotechnical study required for the project, per Table 8.1 of the <i>Safety Element</i> . The proposed project's consistency with policies found in the <i>Safety Element</i> is discussed below.
Policy 4.2: The City shall require appropriate grading, erosion control measures and replanting to minimize erosion and prevent slippage of human-made slopes.	Consistent. The proposed project would comply with the Statewide Construction General Permit that requires implementation of an SWPPP to address erosion and sedimentation at the project site during construction activities. Temporary BMPs, such as installation of silt fences, straw waddles, sediment traps, gravel sandbag barriers, or other effective BMPs, would be implemented to control runoff and erosion during construction activities. Post-construction measures, such as surface-drainage design provisions that would recapture and filter runoff prior to irrigation reuse, along with proper maintenance practices would reduce potential soil erosion during operation of the proposed project. Furthermore, the proposed project would be required to comply with the San Diego Municipal Code Section 142.0146 (Erosion, Sedimentation, and Water Pollution Control), which states that all development should implement and maintain both temporary and permanent erosion-, sedimentation-, and water pollution control measures, and City of Santee

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	Municipal Code Section 11.40.140 (Erosion Control Plans), which states that an applicant for a grading permit must submit plans for an erosion-control system.
Objective 7.0: Preserve significant biological resources.	
Policy 7.1: The City shall encourage the preservation and enhancement of significant biological resources in areas designated as permanent open space.	Consistent. The proposed project includes several avoidance areas to minimize impacts to sensitive habitat including all environmentally sensitive lands within the City of San Diego MHPA. The project was also redesigned to avoid direct impacts to all potentially suitable habitat for southwestern willow flycatcher. Mitigation measures have been identified in the <i>Biological Resources Report</i> (Appendix E) to avoid impacts on sensitive vegetation communities and special-status species to the extent feasible and compensate for sensitive vegetation-community impacts that cannot feasibly be avoided. Mitigation measures include implementing a Restoration Plan, Resource Management Plan, and SWPPP, identifying and protecting environmentally sensitive areas, having a qualified biologist provide construction monitoring, enforcing a maximum 25-mile-per-hour speed limit during construction, minimizing indirect noise impacts on riparian birds, avoiding disturbance of vegetation during the bird-nesting season, and mitigating impacts by purchasing mitigation bank credits or creating new habitat. Measures to avoid direct impacts on special-status species during breeding season also have been identified. See Section 3.3, Biological Resources, for more details.
Policy 7.2: The City shall require that all development proposals provide appropriate mitigation for identified significant biological resources including selective preservation, sensitive site planning techniques and in-kind mitigation for identified impacts.	Consistent. To mitigate for impacts on Diegan coastal sage scrub, nonnative grasslands, and least Bell's vireo (<i>Vireo bellii pusillus</i>) habitat, the proposed project would be required to either purchase mitigation bank credits or create mitigation areas. See the <i>Biological Resources Report</i> included as Appendix E for more details.
Policy 7.3: The City shall require that, for all development proposals involving the setting aside of land for permanent open space either on-site or offsite, provisions are in place to ensure the long-term management of the open space and biological resources.	Consistent. If the creation of a mitigation site option were chosen to mitigate impacts on Diegan coastal sage scrub, nonnative grasslands, and least Bell's vireo habitat, then a resource management plan would be prepared to ensure the long-term management of the mitigation site.
Policy 7.4: The City shall complete a Multiple Species Conservation Program Subarea plan that conserves a minimum of 2,600 acres in the City as permanent open space for preservation of habitats and species.	Not Applicable. The proposed project does not fall within the City of Santee's Multiple Species Conservation Program (MSCP) area, and therefore this policy would not apply.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
Objective 8.0: Preserve significant cultural resources.	
<p>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.</p>	<p>Consistent. In the <i>Cultural Resources Inventory Report</i> (Appendix F), professionally qualified architectural historians recorded and evaluated each of the seven built resources of historic age for historic significance against California Register of Historic Resources (CRHR) significance criteria and determined that none of these resources appear eligible for CRHR listing. Thus, none of the seven resources are considered historic resources for the purposes of CEQA. Two prehistorical archaeological resources were identified in the study area, and preservation measures have been identified. Preservation measures include retaining a qualified archaeologist, providing preconstruction cultural resources sensitivity training, installing fencing around the identified prehistorical site, avoiding the site where feasible, capping the site with clean fill to avoid disturbance, and developing a Cultural Resources Monitoring Plan (CRMP) and Data Recovery Plan. Monitoring and Data Recovery Plans outline the procedures for implementing archaeological and Native American monitoring during construction and data recovery where impacts cannot be avoided.</p>
<p>Policy 8.2: The City should require curation of any recovered artifacts as a condition of any cultural resources mitigation program.</p>	<p>Consistent. Prior to the start of any project-related ground-disturbing activities or the issuance of grading permits, a qualified archaeologist would prepare a CRMP that would include reporting monitoring results and the curating artifacts and data at an approved facility.</p>
Objective 9.0 Reduce pollutants in urban runoff and stormwater discharges.	
<p>Policy 9.1: The City shall use careful planning and review to identify and eliminate urban runoff problems before development is approved.</p>	<p>Consistent. A SWPPP would include BMPs for minimizing runoff into San Diego River. All runoff from the residential and hotel sites would be captured and cleaned in accordance with the Regional Water Quality Control Board (RWQCB) General Permit, and discharge from these areas would be intercepted in biofiltration devices that promote natural infiltration and evapotranspiration, which removes trash, sediment, and other pollutants generated by development before waters are discharged to natural drainages. Native vegetation would also be planted around the river buffer, which would prevent nonnative grasses from encroaching on the riparian habitat and would filter potential urban runoff.</p>
<p>Policy 9.2: The City shall enforce the implementation of appropriate best management practices (BMPs) during construction projects.</p>	<p>Consistent. The proposed project would require the development and implementation of an SWPPP, which would identify which construction BMPs would be implemented in order to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness.</p>
<p>Policy 9.3: Reduce the discharge of pollutants into the storm drain system from existing municipal, industrial, and commercial facilities and residential areas to the maximum extent practicable.</p>	<p>Consistent. Please see response to Policy 9.1, above.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
Objective 10: 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: The City should encourage the preservation of significant natural features, such as watercourses, ridgelines, steep canyons, and major rock outcroppings through the Development Review process. (City)	Consistent. The proposed project would maintain the existing drainage patterns. The main San Diego River channel to the south of the golf course area would be not directly affected. The Sycamore Canyon Creek channel through the middle of the golf course would be modified and improved to maintain the current functions and values the channel. The project would be consistent with Clean Water Act Sections 404 and 401, the Porter-Cologne Water Quality Control Act, and California Fish and Game Code Section 1600. In accordance with agency regulations, the project would avoid and minimize impacts on jurisdictional aquatic resources. The project also would minimize direct and indirect impacts on Sycamore Canyon Creek—the most substantial aquatic resource on the project site—by limiting impacts on the northern portion of the pond and realigning the pond and stream channel to the south to minimize impacts associated with the development and golf course. Realigned features would be similar to existing conditions, provide similar functions and services, and allow for unimpeded flows. All adverse impacts on aquatic resources would be mitigated at an appropriate ratio, as required by the regulatory agencies (i.e., U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and RWQCB).
Objective 11: Promote a balanced mix of open space uses with development throughout the City to enhance visual resources, avoid hazards and conserve resources.	
Policy 11.1: The City should promote the dedication of open space or parklands and the designation of private open space within all proposed residential developments.	Consistent. A portion of the project site within the City of Santee is currently designated as P/OS and would maintain land uses supporting open space. The proposed project also includes additional community recreational and open space areas in both of the residential developments.
Policy 11.5: The City shall encourage compact development plans when appropriate to maximize the preservation of open spaces.	Consistent. The proposed development includes compact multifamily housing within the western and northern portions of the project site. Residential West and Residential North would have development densities of 9 and 7 dwelling units per acre, respectively. Additionally, 104 acres of the existing golf course would be retained as open space, and the proposed residential developments would include approximately 30,000 square feet of community recreational space.
Noise Element	
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	Consistent. The proposed project would be required to comply with the City of Santee's Noise Ordinance to eliminate or otherwise minimize the impact of noise-producing uses on the project site. Potential noise impacts associated with construction and operation are evaluated as in

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
review for new public and private development and code compliance for existing development.	Section 3.12, Noise and Vibration, and measures are identified to minimize impacts, where applicable.
Policy 1.2: The City shall utilize noise studies and noise contour maps when evaluating development proposals during the discretionary review process.	Consistent. A noise analysis was conducted and included as part of the EIR to evaluate potential noise impacts associated with construction and operation and identify measures to minimize impacts where applicable.
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.	Consistent. Noise-sensitive land uses adjacent to the project consist of single-family and multifamily residences, hotels, a church, and a school, all of which were considered during the noise evaluation.
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 under Policy 1.1 of the City of Santee's <i>General Plan – Noise Element</i> (City of Santee 2003e), the proposed project would be required to comply with the City of Santee's Noise Ordinance to eliminate or otherwise minimize the impact of noise-producing uses on the project site.
Objective 2.0: Ensure that future developments would 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.	Consistent. The proposed project would be required to comply with the City of Santee's Noise Ordinance to eliminate or otherwise minimize the impact of noise-producing uses on the project site. As discussed in Section 3.12, Noise and Vibration, implementation of the proposed project would create a potentially significant noise impact because 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. With the implementation of the identified mitigation measures, noise impacts associated with project construction and operation would be less than significant.
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. As discussed in Section 3.12, Noise and Vibration, implementation of the proposed project would create a potentially significant noise impact due to off-site traffic noise affecting proposed residential uses. As noted above, mitigation was identified to reduce impacts from off-site traffic noise to less than significant. Impacts from construction traffic and operational traffic affecting off-site receivers would be less than significant.
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. The proposed project would add a dedicated left-turn lane and an access driveway to Residential West via West Hills Parkway. The roadway would be widened within the existing ROW (i.e., paved and unpaved shoulder), and no additional dedication would be required. Additionally, the proposed project's residential and commercial uses are anticipated to generate VMT over the

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
existing street, but does not necessitate widening of that street.	City of Santee's significance threshold, causing a significant transportation impact. Mitigation measures are identified in Section 3.12, Noise and Vibration, to minimize noise impacts to less than significant.
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.	Consistent. The proposed project would improve existing water flow, thus improving recreational use of project site from improved flood control. Part of the improvements within the golf course would include repairs to the existing, nonfunctioning drainage systems, which would reduce the amount of ponding that occurs on site. Additionally, the project would extend existing City of Santee storm drain systems to outlet closer to appropriate water courses, thus reducing the amount of ponding that would occur on site.
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.	Consistent. Per the <i>Preliminary Flood Study</i> (i.e., the CLOMR; Appendix L), the floodway would be remapped, and the proposed development would not occur within the floodway. Grading adjustments would occur as part of the proposed project in order to elevate some portions of the project site and lower other portions to ensure that all structures would be located outside of the floodplain once the project is completed.
Policy 1.3: All proposed projects which would modify the configuration of any of the three main waterways in Santee (San Diego River and Sycamore and Forester Creeks) shall be required to submit a report prepared by a registered hydrologist that analyzes potential effects of the project downstream as well as in the local vicinity.	Consistent. A <i>Preliminary Flood Study</i> (i.e., the CLOMR; Appendix L) has been prepared by a registered hydrologist that analyzes potential effects of the project downstream and in the local vicinity. Per the report, the proposed project would have no impact on the upstream or downstream water surface elevation as compared to the base-flood elevations. See Section 3.9, Hydrology and Water Quality, for additional details.
Policy 1.4: The City should actively pursue the improvement of drainage ways and flood control facilities so as to lessen recurrent flood problems and include such public improvements in the Capital Improvements Program for the City.	Consistent. See response to Policy 1.1, above.
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. A <i>Preliminary Flood Study</i> (i.e., the CLOMR; Appendix L) has been prepared by a registered hydrologist that analyzes potential effects of the project on downstream and upstream properties and, for development proposed in the floodplain, on the flood-carrying characteristics of the stream. Per the report, the proposed project would have no impact on the upstream or

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>Policy 1.8: Development within the 100-year floodway shall be prohibited, subject to the provisions of the City's Flood Damage Prevention Ordinance (City).</p>	<p>downstream water surface elevation as compared to the base flood elevations. See Section 3.9, Hydrology and Water Quality, for additional details.</p> <p>Consistent. Per the <i>Preliminary Flood Study</i> (i.e., the CLOMR; Appendix L), the floodway would be remapped, and the proposed development would not occur within the floodway. All development would be consistent with the City of Santee's Flood Damage Protection Ordinance. Of specific note would be City of Santee Municipal Code 11.36.200A, which prohibits encroachment, fill, and construction unless a registered professional engineer demonstrates that these improvements would not increase the flood elevation. The proposed project also meets all standards for subdivisions per City of Santee Municipal Code 11.36.180.</p>
<p>Objective 2.0: Minimize the loss of life and destruction of property in Santee cause by seismic and geologic hazards.</p>	
<p>Policy 2.1: The City should utilize existing and evolving geologic, geophysical, and engineering knowledge to distinguish and delineate those areas that are particularly susceptible to damage from seismic and other geologic conditions.</p>	<p>Consistent. Implementation of the proposed project would not exacerbate the potential of a rupture of a known earthquake fault, strong seismic ground shaking, or landslides. However, the proposed project may exacerbate the potential for liquefaction. New structures would be constructed in compliance with all applicable building codes and include additional features, as applicable, that would be based on the results of the project's geotechnical study.</p>
<p>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.</p>	<p>Consistent. Geotechnical Investigation Reports (Appendices G1 and G2) and Phase I and II Environmental Site Assessment Reports (Appendices H1 and H2) have already been prepared for the proposed project. The project site is not located on any known "active," "potentially active," or "inactive" fault traces, as defined by the California Geological Survey (Appendices G1 and G2). It was determined in Section 3.6, Geology and Soils, that construction and operation of the proposed project would not have the potential to exacerbate rupture of an active fault or conditions that would promote strong seismic ground shaking or landslides. However, the proposed project would exacerbate the potential for liquefaction. With implementation of MM-GEO-1, Geotechnical Recommendations, potential impacts would be less than significant because compliance with regulations would be demonstrated in the geotechnical investigation, which would include recommendations for design and construction practices.</p>
<p>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.</p>	<p>Consistent. Geotechnical Investigation Reports (Appendices G1 and G2) and Phase I and II Environmental Site Assessment Reports (Appendices H1 and H2) have already been prepared for the proposed project. The proposed project would be required to mitigate any potentially significant geotechnical and soil hazards identified in the EIR. Additionally, a Soil Management Plan would be required to be created prior to the City of Santee's approval of the project.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
Objective 3.0: Minimize the risk of damage to persons, property and the environment caused by hazardous materials.	
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.	Consistent. Hazardous material issues were investigated in a Phase I and Phase II Environmental Site Assessments (Appendices H1 and H2) for the proposed project. These investigations found that the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
Policy 3.8: Promote safe, environmentally sound means of solid waste disposal for the community.	Consistent. Commercial and residential trash hauling and industrial solid waste and recycling collection and disposal services are provided by Waste Management, Inc., under a contractual franchise agreement with the City of Santee.
Objective 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.	Consistent. The proposed project would comply with all applicable California Building and Fire Code requirements for development in a Very High Fire Hazard Severity Zone (VHFHSZ), including, but not limited to, specific requirements for structural hardening, water supply and flow, hydrant and standpipe spacing, signage, and fire department access. The project provides firefighting water volume, availability, and sustained pressures to the satisfaction of the Santee Fire Department. Water accessibility helps firefighters control structural fires and helps protect structures from and extinguish wildfires.
Policy 4.9: All proposed developments 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.	Consistent. The proposed project would adhere to current building codes and standards that require defensible space to be provided around all structures located in VHFHSZ and would reduce the potential flammability of the landscape. All site landscaping of common areas and FMZs would be subject to strict plant types that are lower-ignition plants, with those closest to structures requiring irrigation to maintain high plant moistures, which equates to difficult ignition. Additionally, the project benefits from the golf course which includes irrigated and maintained, low fuel, highly ignition resistant landscapes, open water, and functions as a large fuel break. The proposed project would provide improved access for firefighters to fight wildland fires. See Section 3.18, Wildfire, for additional details.
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.	Consistent. The project site falls within Review Area 2 of the Gillespie Field Airport Influence Area. As discussed in Section 3.8, Hazards and Hazardous Materials, the project proponent obtained FAA approval (Appendix I) and will receive ALUC review and determination for any construction equipment and operational structures proposed to be over 35 feet in height. These actions ensure that construction and operation of the proposed project would not affect the safe and efficient utilization of the navigable airspace by aircraft or the operation of air navigation facilities.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
Community Enhancement Element	
Objective 2.0: Strengthen neighborhood identity.	
Policy 2.1: The City shall promote introduction of distinctive landscape treatments, signage, entry statements, etc., in residential areas.	Consistent. The community would have private entries to the Residential West and Residential North Areas that would include entry monument signs and decorative pavers. The primary plant palette for the proposed Carlton Oaks Country Club and Resort would include a diverse array of plant materials and textures. The street trees, community entries, perimeter edges, and open spaces would serve as unifying elements throughout the project site.
Policy 2.2: The City shall encourage the use of existing natural features (river, hillsides, etc.) as character/ theme sources for new residential development.	Consistent. The design of the residential development would emphasize the panoramic views of San Diego River to maximize the community's enjoyment while retaining the natural resources of the area.
Policy 2.3: The City should encourage the strengthening of neighborhood edges through strategic location of open space/recreational buffers, use of distinctive street tree/streetscape designs and changes in residential product/forms.	Consistent. The residential developments would include entry monument signs and decorative pavers. The primary plant palette for the proposed Carlton Oaks Country Club and Resort would include a diverse array of plant materials and textures. The street trees, community entries, perimeter edges, and open spaces would serve as unifying elements throughout the project site.
Objective 3.0: Improve the diversity and quality of housing in the City.	
Policy 3.1: The City shall encourage innovative site planning and housing product designs.	Consistent. The proposed project would provide the innovative approach of integrating residential uses with the golf course and resort to make recreational and commercial facilities readily accessible to the homeowners. In turn, the homeowners would provide economic vitality to the Carlton Oaks Country Club and Resort by activating the facilities and the site year-round, further ensuring the long-term preservation of the golf course. The residential developments would also include an array of open space and recreational facilities, including playgrounds, a dog run area, picnic tables, bench seating, a pool, lounge seating, a putting green, and a chipping area.
Policy 3.2: The City shall promote the mix of housing product types and site planning features within larger residential developments.	Consistent. The proposed project would provide a variety of housing types, including 86 detached multifamily residential units within the western-most portion of the project site (Residential West) and 150 detached multifamily residential units within the northern portion of the project site (Residential North). In addition, six single-family lots, plus one existing single-family lot, would front Carlton Oaks Drive and allow for single-story homes on 6,000-minimum-square-foot lots. The residential units within Residential West would include a mixture of Modern Spanish, Transitional Monterey, and Transitional Farmhouse designs on pads measuring, at minimum, 40 by 70 feet. The residential units within Residential North would include a mixture of Modern Farmhouse,

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	Prairie Inspired, and Modern Spanish designs on pads measuring approximately 50 by 46 feet and 47 by 70 feet.
Policy 3.3: The City shall encourage use of varied setbacks, lot orientations and placement of dwelling units.	Consistent. The proposed project includes residential unit clusters with varied lot orientations divided into two separate areas of the project site.
Policy 3.4: The City shall discourage the overuse of repetitious dwelling unit designs and site planning features.	Consistent. As discussed in the response to Policy 3.2, the residential developments would include a variety of architectural designs, including Modern Spanish, Transitional Monterey, Transitional Farmhouse, and Prairie Inspired. The mix of architectural styles would prevent repetitious designs, and details like wood siding, balconies, porches, materials, and colors would be used to create consistency and cohesion throughout the project.
Policy 3.5: The City shall encourage adaptive housing products and siting treatments in hillsides and along the river corridor that respect and enhance the features of the natural environment.	Consistent. The proposed project would be implemented in a manner that would enhance San Diego River because it has been sensitively designed the project around the surrounding natural resource areas. The project would widen and enhance the stream course in some areas, increase the functionality of the river, and restore the surrounding vegetation. Additionally, the design of the residential developments would emphasize the panoramic views of San Diego River to maximize the community's enjoyment while retaining the natural resources of the area.
Policy 3.6: The City shall support housing in mixed use projects that offer a desirable urban lifestyle.	Consistent. The proposed project would redevelop the existing Carlton Oaks Country Golf Club into a recreation-oriented, mixed-used community with multigenerational appeal. As discussed in the response to Policy 3.1, above, the project would provide residents with readily available access to the recreational and commercial facilities at the golf course and resort.
Objective 4.0: Promote the integration of new residential development with the existing community.	
Policy 4.2: The City shall ensure that new residential development are adequately linked to the existing community by streets, sidewalks, trails and bikeways.	Consistent. The proposed project would include an interconnected system of golf cart paths, a multiuse path, and sidewalks that connect residential areas to resort facilities. A public multipurpose trail would be provided on the property on the northern side of San Diego River, linking with existing and planned trails to the east and west of the site.
Objective 9.0: Provide a unifying and distinctive streetscape system throughout the City.	
Policy 9.1: The City shall promote visual continuity of traffic ways through coordinated landscape plantings, lighting and street improvements which reinforce the hierarchy of the street system.	Consistent. Landscaping associated with the proposed project on internal private roads would complement the adjacent Carlton Oaks Golf Course segment of the San Diego River. Pedestrian pathways would be well lit, West Hills Parkway would be widened to provide dedicated left-turn lane and an access driveway to the Residential West Area, and a 0.439-acre landscape easement would be included.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
Policy 9.3: The City shall ensure adequate landscaped buffers are provided between traffic ways and sidewalks.	Consistent. As discussed above, a landscape easement would be included along the widened portion of West Hills Parkway and the entrance to the resort from Carlton Oaks Drive that includes vegetation designed to enhance the aesthetic setting for pedestrians and those traveling on the roadway.
Objective 14: Minimize alteration of existing topography especially in hillside areas during the development and redevelopment process.	
Policy 14.1: The City shall encourage and work with developers to minimize the impacts of grading for new development throughout the City.	Consistent. The proposed project would comply with the City of Santee Municipal Code Section 11.40.140 (Erosion Control Plans), which states that an applicant for a grading permit must submit plans for an erosion-control system to minimize impacts of grading. Additionally, all grading work must incorporate erosion- and siltation-control measures in accordance with Chapter 14, Article 2, Division 4 (City of Santee Landscape Regulations) and the standards established in the <i>Land Development Manual</i> .
Policy 14.2: The City shall ensure that development is oriented along natural terrain contours to extent possible to maintain landform integrity.	Consistent. The proposed project would be implemented in a manner that would enhance San Diego River by sensitively designing the project around the surrounding natural resource areas. The project would widen and enhance the stream course in some areas, increase the functionality of the river, and restore the surrounding vegetation. The proposed updates to the golf course have been thoughtfully designed to follow the contours of the existing natural topographical features of the San Diego River valley. Twelve of the new golf holes would maintain the original contours, and all 18 holes would maintain the characteristics of the existing contours, drainage, and floodway and, most importantly, protect natural drainage patterns. Additionally, these contours would respect the interior Sycamore Canyon Creek area that flows through the center of the golf course. The majority of the proposed grading for the golf course has been designed around the existing natural creek. Only a few limited areas of the creek would be temporarily affected by the construction of the golf course; however, the project proposes to not only restore and enhance these areas, but also widen the natural drainage.
Objective 15.0: Maintain and enhance existing scenic views.	
Policy 15.1: The City shall require revegetation of graded slopes with indigenous plant materials, where feasible, to maintain scenic views and assist in slope stabilization.	Not Applicable. The project site would be relatively flat to gently sloping, and significant slopes do not exist adjacent to the site.
Policy 15.2: The City should provide for the maintenance of view opportunities to surrounding hillsides by ensuring proposed structures do not significantly impact existing community-level viewsheds.	Consistent. The renovation of the golf course and construction of the country club and hotel would not block a scenic vista. The new proposed location of the resort has decreased in size and intensity from existing conditions. The residential development would be located in the designated PD area that has no height restrictions. However, the new residential homes would be low-profile (i.e., not exceeding two stories in height) and would not have a substantial impact on

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	<p>an existing scenic vista. Certain construction activities associated with the residential components would be visible from surrounding areas, including SR-52, West Hills Parkway, and the trail abutting the project site to the south. However, these actions would be temporary and generally would not block views of scenic vistas.</p>
Objective 16.0: Utilize the natural design elements presented by the river/creek system within the City.	
<p>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.</p>	<p>Consistent. Channelization of waterways would be avoided wherever possible. Where it would occur, it would be for reducing on-course flooding by extending existing City of Santee storm drain systems to outlet closer to appropriate water courses. The proposed updates to the golf course have been thoughtfully designed to follow the contours of the existing natural topographical features of the San Diego River valley. Twelve of the new golf holes would maintain the original contours, and all 18 holes would maintain the characteristics of the existing contours, drainage, and floodway and, most importantly, protect natural drainage patterns. Additionally, these contours would respect the interior Sycamore Canyon Creek area that flows thorough the center of the golf course. The majority of the proposed grading for the golf course has been designed around the existing natural creek. Only a few limited areas of the creek would be temporarily affected by the construction of the golf course; however, the project proposes to not only restore and enhance these areas, but also widen the natural drainage.</p>
Objective 17.0: Balance development with natural resource protection needs.	
<p>Policy 17.1: The City should provide for the preservation of significant habitat and vegetation in strategic locations along watercourses and in undeveloped hillside areas.</p>	<p>Consistent. The project's <i>Biological Resources Report</i> (Appendix E) includes project measures that protect the river environment, including protection of riparian habitat and protected species. Where impacts were identified, measures are proposed to minimize impacts.</p>
<p>Policy 17.2: The City should promote the incorporation of unique and significant natural resource features (vegetation, habitat, rock outcrops) into development plans.</p>	<p>Consistent. As discussed above in the response to Policy 16.4 of the City of Santee's <i>General Plan's - Community Enhancement Element</i>, the project was designed to minimize impacts on San Diego River and Sycamore Creek. The redesign of the golf course also considered factors such as the protection of the surrounding riparian habitat and protected species. Mitigation measures have been identified in the <i>Biological Resources Report</i> (Appendix E) to avoid impacts on sensitive vegetation communities to the extent feasible and compensate for impacts on sensitive vegetation communities that cannot feasibly be avoided. The mitigation measures are discussed in more detail above, in response to Policy 7.1 of the City of Santee's <i>General Plan - Conservation Element</i>.</p>

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Goal, Policy, Objective	Proposed Project Consistency
Santee Measure N/General Plan Policies	
<p>Measure N added Policy 12.1 to Santee's General Plan, which reads as follows.</p> <p>Policy 12.1 – Permitted land uses in the City shall be intensified only when the voters approve such changes. No General Plan amendment, Planned Development Area or new Specific Planning Area shall be adopted which would:</p> <ol style="list-style-type: none"> 1. increase the residential density permitted by law, 2. change, alter, or increase the General Plan Residential Land Use categories if the change intensifies use; or 3. change any residential designation to commercial or industrial designation on any property, or vice versa, if the change intensifies use; <p>unless and until such action is approved and adopted by the voters of the City at a special or general election, or approved first by the City Council and then adopted by the voters in such an election."</p>	<p>Not Applicable. The policy added by Measure N, does not apply to the project. The proposed project is being developed as a mixed-use recreation-related development with a high-quality resort and residential accessory uses, consistent with the uses described in the Guiding Principles of Santee's General Plan. The northern portion of the project site is already designated as a Planned Development Area under the General Plan, which allows the project's residential uses to be located there. The project is also not located within a Specific Plan District that would require a specific plan. Therefore, the project does not trigger the need for voter approval under General Plan Policy 12.1 because the project does not require a General Plan amendment or the adoption of a Planned Development Area or Specific Plan. The project is only required to prepare a master development plan, which is not required to obtain voter approval under the Measure N. Moreover, residential uses are clearly permitted under the Planned Development District zoning designation. Under Santee Municipal Code Section 13.19.030(A), allowable uses and development standards for each planned development district is established through a development review permit so long as such uses are consistent with the guidelines in the <i>Land Use Element</i> of the <i>General Plan</i> for that particular planned development district. As noted earlier, the City of Santee's <i>General Plan</i> allows for accessory residential uses on the Carlton Oaks property. In addition to the uses allowed under a development review permit, the PD zone describes a range of permitted uses, including single-family attached and multiple-family dwellings. These additional residential use types are consistent with the residential use types permitted within the Medium Density Residential (R-7) District of the General Plan. Under the Medium Density Residential (R-7) District, a density range of 7 to 14 dwelling units per gross acre is permitted for a wide range of residential development types, including attached and detached single-family units at the lower end of the density range and multiple-family attached units at the higher end of the density range.</p> <p>One existing single-family home would remain in the R2 zone, which results in a density of 2.7 dwelling units per acre. The R2 zone allows for a density range of 2 to 5 dwelling units per gross acre and is intended for single-family homes on a minimum of 6,000 square feet, which is consistent with the residential unit to remain in the R2 zone within the project site.</p> <p>Nor is the project increasing residential density or intensifying uses from what is already allowed under the <i>General Plan</i> and the zoning code. As described above, the project would be developed as a mixed-use recreation-related development with a high-quality resort and recreation that allows for residential accessory uses under the PD-designated areas. As allowed under the PD zone, the project seeks approval of a development review permit for 243 homes. The proposed project's residential density would be between 8.2 and 9 units per acre within the PD zone, which</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	is in line with the density range for similar residential use types allowed under the Planned Development (PD) zone. Therefore, there is no “intensification” of use from what is already permitted on the site. Modification of the existing driveway to the single-family home that would remain is also consistent with the underlying R2 zone (2.7 dwelling units per acre) that allows single-family homes on 6,000-square-foot lots and density of 2 to 5 dwelling units per acre.
Policy 12.2: No change to the slope criteria and minimum parcel sizes and lot averaging provisions of this General Plan which would permit increased density or intensity of use shall be adopted unless and until such change is approved by ordinance adopted by the voters of the City at a special or general election, or approved first by the City Council and then adopted by the voters in such an election.	Not Applicable. The project is not amending or changing the <i>General Plan</i> -related policies for slope criteria, minimum parcel sizes, or lot averaging that would increase density or intensity of use.
City of Santee Municipal Code Title 13 (Zoning)	
Chapter 13.08 Development Review, Section 13.08.010 Purposes and General Plan Consistency	
<p>This section establishes review procedures for residential, commercial, industrial, and institutional development proposals to achieve the following purposes:</p> <p>A. To encourage site and structural development which exemplify the best professional design practices.</p>	Consistent. The proposed project would provide a high-quality resort facility that offers a full-service hotel and event facility. The proposed project would also redesign and substantially improve the underutilized golf course with a professionally designed layout that allows the golf course to meet the needs of the local City of Santee community, as well as the broader tourism needs, to ensure that it would be economically viable into the future. In addition, the proposed project would provide high-quality housing opportunities for existing City of Santee residents and residents in surrounding areas. As discussed in the response to Policy 3.2, the residential developments would include a variety of architectural designs, including Modern Spanish, Transitional Monterey, Transitional Farmhouse, and Prairie Inspired. The mix of architectural styles would prevent repetitious designs, and details like wood siding, balconies, porches, materials, and colors would be used to create consistency and cohesion throughout the project.
B. To enhance the residential and business property values within the City and in neighborhoods surrounding new development.	Refer to response to Section 13.08.010A above, for more information on how the project proposes a high-quality resort facility and residential development. The proposed project would integrate residential uses with the golf course and resort to make the facilities readily accessible to the homeowners. In turn, the homeowners would provide economic vitality to the Carlton Oaks Country Club and Resort ensuring the long-term preservation of the golf course which serves as a vital recreational facility for the benefit of Santee residents and businesses. The proposed project would invigorate the local economy by providing additional employment and business

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
C. To develop property in a manner which respects the physical and environmental characteristics of each site.	<p>opportunities associated with the design, construction, and operation of the project. Further, the proposed project would generate additional economic revenue for the City of Santee and County of San Diego through sales taxes, transient occupancy taxes, and property taxes.</p> <p>Consistent. The proposed project has been designed to minimize impacts on natural resources. Mitigation measures have been identified for the proposed project to avoid impacts on sensitive vegetation communities to the extent feasible and compensate for impacts on sensitive vegetation communities that cannot feasibly be avoided. In order to comply with federal and state regulations protecting waters and wetlands, waterways and wetlands would be avoided to the maximum extent practicable.</p> <p>See the responses to the City of Santee's <i>General Plan – Land Use Element</i> and <i>Community Enhancement Element</i> policies above for more information.</p>
D. To minimize stress from poorly designed development which can create physical and psychological conditions affecting the health, safety, comfort and general welfare of the inhabitants of the City.	<p>Consistent. See response to Section 13.08.010A above, for more information on how the project proposes a high-quality resort facility and residential development. The proposed project ensures the long-term preservation of the golf course which serves as a vital recreational facility for the benefit of Santee residents. In addition to the newly designed golf course, the residential developments would also include an array of open space and recreational facilities, including playgrounds, a dog run area, picnic tables, bench seating, a pool, lounge seating, a putting green, and a chipping area. Landscaping is proposed to be used to complement the unique neighborhood identity of Carlton Oaks. Newly planted trees would improve air quality on the site and create visual appeal. Evergreen trees and shrubs are proposed to soften architectural façades and site walls. Trees would also be used to create shade and scale throughout the community, including at the various recreational spaces. Planting native species around the riparian buffer would enhance the natural features of the area and support water-management goals by providing erosion control and a filtration system for urban runoff.</p>
E. To ensure that each new development is designed to best comply with the intent and purpose of the zone in which the property is located and with the General Plan of the City.	<p>Consistent. The proposed Carlton Oaks residential uses would be located within the PD-designated portion of the project site, which is permitted under the City of Santee's <i>General Plan</i> and zoning designation, except for one existing single-family home to remain and one new single-family home proposed within the R-2 zone. Allowable uses and development standards in each PD district are established through a development review permit pursuant to and consistent with the guidelines contained in Section 5.5, Areas for Special Study, within the Land Use Element of the City of Santee's <i>General Plan</i> for each respective PD-designated property. Multifamily and single-family attached residential uses are also allowed as a permitted use under the PD District zoning designation. A total of 242 new residential units will be built, including 86 units in the PD zone in Residential West (9 dwelling units per acre) and 156 units in the PD zone in Residential North (8.2 dwelling units per acre) plus a driveway modification to an existing home in the R2</p>

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Goal, Policy, Objective	Proposed Project Consistency
	zone (2.7 dwelling units per acre in the R2 zone); densities are consistent with the City's residential land use districts (R2 and R7). The R-7 land use district allows for a wide range of residential development types, including attached and detached single-family units, multifamily attached units, apartment and condominium buildings, and multifamily dwellings (townhomes and detached condominiums). Additionally, the one existing single-family home that would remain would be consistent with the underlying R2 zone. The R2 zone allows for a density range of 2 to 5 dwelling units per acre, and the project involves a density in the R2 zone of 2.7 dwelling units per acre.
F. To ensure that access to each property and circulation thereon are safe and convenient for pedestrians and vehicles.	Consistent. The residential developments would be connected to the recreational and commercial uses at the Carlton Oaks Country Club and Golf Course by an interconnected system of golf cart paths, a multiuse path, and sidewalks for pedestrian and bicycle use. Housing units and interior streets would provide off-street parking and would be separated into two residential planning areas, each with controlled access to maintain safe interior circulation patterns. To provide safe intersections, the proposed project would design all project driveways to City of Santee or City of San Diego standards, depending on location.
G. Regarding all properties designated as general commercial, neighborhood commercial or office professional: Development and redevelopment shall be comprehensively designed, entitled and developed whenever it is determined by the City that the permitting of incremental construction and uses may significantly inhibit or otherwise be detrimental to fulfilling the economic and development potential of the site. Any development review permit, conditional use permit or minor conditional use permit which is not consistent with this policy shall be denied.	Not Applicable. The project site is not designated as general commercial, neighborhood commercial or office professional and therefore this policy does not apply to the proposed project.
13.16 Park/Open Space	
A. Promote a balanced mix of open space uses with development throughout the City in order to provide the enhancement of visual resources, avoidance of hazards, and conservation of resources.	Consistent. The proposed project includes a recreational mixed-use development and preservation of open space. The proposed project would be implemented in a manner that would enhance San Diego River by sensitively designing the project around the surrounding natural resource areas. Additionally, the project site would be designed to avoid flood hazards and minimize risk levels by remapping the existing floodway so that development would not occur within it. To limit fire risk, the proposed project would adhere to current building codes and

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	standards that require defensible space to be provided around all structures located in VHFHSZs, which would reduce the potential flammability of the landscape.
B. Preserve significant natural resources, such as mineral deposits, biological resources, watercourses, hills, canyons, and major rock outcroppings, as part of a citywide open space system.	Consistent. The proposed project would not be located within the City of Santee MSCP preserve system. The proposed project has been designed to minimize impacts on natural resources. Mitigation measures have been identified for the proposed project to avoid impacts on sensitive vegetation communities to the extent feasible and compensate for impacts on sensitive vegetation communities that cannot feasibly be avoided. In order to comply with federal and state regulations protecting waters and wetlands, waterways and wetlands would be avoided to the maximum extent practicable.
C. Maintain floodways as open space in order to reduce flood hazards, and to preserve the aesthetic quality along water corridors.	Consistent. As discussed further in Section 3.9, Hydrology and Water Quality, of this EIR, the project site would be located within the regulatory limits of San Diego River (i.e., floodplain and floodway) The majority of the project site within the 100-year floodplain would be maintained as open space (i.e. golf course). The proposed grading for the clubhouse, hotel, and golf course would occur within the regulatory floodway. Development associated with the proposed project would include elevating the grade of the clubhouse and hotel development area above the floodplain. The grading for portions of the residential development areas would be within the floodplain limits. A small portion of Residential North would encroach into the existing floodplain. No development on the project site would exist within the designated 100-year floodplain in the post-project condition. A CLOMR must be approved prior to the issuance of any grading permits which would ensure that all structures are raised out of the floodplain and would not be at risk for damage related to floods and would demonstrate that the project would meet minimum federal regulations.
D. Encourage the preservation of significant historical and archaeological sites in the City.	Consistent. In the <i>Cultural Resources Inventory Report</i> (Appendix F), professionally qualified architectural historians recorded and evaluated each of the seven built resources of historic age for their historic significance against CRHR significance criteria and determined that none of these resources appeared eligible for CRHR listing. Thus, none of the seven resources are considered historic resources for the purposes of CEQA. Two prehistorical archaeological resources were identified in the study area, and preservation measures have been identified. Preservation measures include retaining a qualified archaeologist, providing preconstruction cultural resources sensitivity training, installing fencing around the identified prehistorical site, and developing of a Cultural Resources Monitoring Plan and data recovery plan.
E. Preserve open space to adequately protect the public from fires, flooding, and landslides.	Consistent. The proposed project would retain 104 acres of the existing golf course as open space, which would serve as a wildfire buffer between the heavily vegetated area along the river corridor and the residential developments. Grading would be performed in accordance with all applicable regulations to prevent landslide conditions. In addition, BMPs would be required to

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Goal, Policy, Objective	Proposed Project Consistency
	protect soils from erosion, reduce flood risk, and control stormwater. The project would require a CLOMR and LOMR be processed through FEMA to revise the flood mapping at the project site. No development on the project site would exist within the designated 100-year floodplain in the post-project condition. A CLOMR would be completed that would demonstrate that, if built as proposed, the project would meet minimum federal regulations. See Section 3.6, Geology and Soils, Section 3.9, Hydrology and Water Quality, and Section 3.18, Wildfire, for additional detail on project impacts related to landslides, flooding, and wildfires, respectively.
F. Provide adequate recreational acreage and facilities in all areas of the City.	Not Applicable. This land use policy is directed toward the City of Santee. However, the proposed project would accommodate planned improvements to SANDAG's San Diego River Trail along the Carlton Oaks Golf Course segment of the San Diego River. Also, the landscaping plan for the proposed project includes additional community recreation and enhanced open space areas in both the western and eastern portions of the project, as described above.
G. Encourage private recreational uses which exhibit large amounts of open space.	Consistent. The proposed project would retain 104 acres of the existing private golf course. In addition, recreational areas would be added within proposed residential areas, connecting private residences with recreational opportunities.
13.19 Planned Development District	
A. Allowable uses and development standards in each planned development district shall be as established through a development review permit pursuant to and consistent with the guidelines contained in Section 5.5, Areas for Special Study, within the Land Use Element of the General Plan for each respective planned development designated property.	Consistent. The project site is currently designated as P/OS, PD, and R-2. The proposed project would provide a development that complements the adjacent residential neighborhoods and surrounding areas, by focusing on infill development that efficiently utilizes available space. The proposed Carlton Oaks residential uses would be located within the PD-designated portion of the project site, which is permitted under the City of Santee's <i>General Plan</i> and PD zoning designation. One existing single-family home will remain within the R-2 zone. Development standards in each planned development district are established through a development review. The development standards for this project were established through development permit DR-2019-5 and are provided as Appendix S, Planned Development District Standards. The proposed residential development would be consistent with these development standards.
Sustainable Santee Plan	
Goal 5: Decrease energy demand through reducing urban heat island effect	Consistent. Trees and shrubs would be used to create shade throughout residential and resort facility areas of the project, consistently with the project's landscaping plan. In addition, the proposed project would include recreational use areas with vegetation within residential areas and retain riparian areas and 104 acres of vegetated golf course, which would offset new structures and paved areas.

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Goal, Policy, Objective	Proposed Project Consistency
Goal 6: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled	Consistent. As outlined in the proposed project <i>Transportation Impact Study</i> (Appendix O1) (see TDM Measures 1A, 1D, 1E, 4E, and 4G), the proposed project would subsidize transit passes for its employees, provide a bicycle-share program for hotel guests, implement and incentivize a vanpool program for employees, and implement a community-based travel plan for its residents. The proposed project would also participate in SANDAG's iCommute program to assist project residents and employees with ridesharing for their commute.
Goal 7: Increase Use of Electric Vehicles	Consistent. The proposed project would include the installation of EV chargers in the golf course clubhouse's parking lot.
Goal 9: Decrease greenhouse gas emissions through reducing solid waste generation	Consistent. Resort facilities and residential units would include recycling receptacles for the collection of on-site recyclable waste by Santee Waste Management and would be processed consistent with City of Santee waste disposal and processing requirements.
Goal 10: Decrease Greenhouse Gas Emissions through Increasing Clean Energy Use	Consistent. See Section 3.7, Greenhouse Gas Emissions, for a discussion of how the proposed project would be consistent with the Santee Climate Action Plan Checklist (Appendix D) and its goal of reducing GHG emissions.
Draft Santee MSCP Subarea Plan	
Land Use Adjacency Guidelines	
1. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, excess water, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the preserves. This will be accomplished using a variety of methods, including natural detention basins, grass swales, or mechanical trapping devices.	Consistent. The new development areas have been designed to drain water into on-site water-detention basins and not flow directly into the habitat preserves.
2. Nighttime lighting from all developed areas nearby to the preserve will be fully shielded and directed downward and, wherever practicable and consistent with public safety, away from the preserve, wildlife and all native vegetation communities. Low-pressure sodium lighting shall be used whenever possible unless other lighting technology with less ecological impacts becomes practicable. Nighttime lighting of roadways, parking	Consistent. The eastern side of the project site, which is adjacent to the Preserve, would remain as golf course. The redesigned golf course would be unlit and would not represent a new source of lighting. All project lighting would conform to the requirements of the Santee Municipal Code, Section 13.30.030(B), and the City of San Diego's Municipal Code, Section 142.0740, which stipulate minimization of spillover light through the use of downward directed and shielded lighting. Low-pressure sodium lighting would be used whenever possible. Project lighting would be shielded and directed away from San Diego River to avoid spillover into the adjacent riparian habitat.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
lots, walkways and similar features nearby to or within Preserve lands will be avoided wherever practicable and otherwise will utilize: the minimum lighting (number and intensity of lights) necessary, the lowest height necessary, lighting that is directed downward and away from Preserve lands, and light sources that are fully shielded so as to only illuminate the area that requires the lighting (e.g., only illuminate the road and sidewalk). Lighting in new or modified developments nearby to Preserves shall be required to be in compliance with the City's revised Municipal Code requirements for exterior lighting.	
3. Human activities and uses nearby to the preserve will be designed and implemented to minimize noise impacts to the preserve and wildlife.	Consistent. Proposed new structures would be situated at a distance from San Diego River, and an existing vegetation buffer adjacent to the river would be retained. Noise generated during construction of the proposed project would be mitigated to avoid affecting nesting birds during the bird-breeding season.
4. No invasive nonnative plant or animal species will be introduced into or maintained in areas within or nearby to the preserve. All open space areas (e.g., golf courses, public parks, landscape areas) nearby to the preserve areas will be planted and maintained with native species that reflect the nearby native natural communities within the preserve.	Consistent. Invasive species would not be introduced into areas immediately adjacent to the preserve areas. All open space slopes immediately adjacent to the preserve would be planted with native species that reflect the adjacent native habitat.
5. Fuel modification zones will be fully contained on adjacent properties for all new development. Prior to implementing new developments adjacent to the Subarea Plan Preserve System, the local fire authority will review and approve proposed fuel modification set-back to ensure that no new fuel modification areas will be located within the Preserve properties.	Consistent. Santee Municipal Code Chapter 49, Section 4905.2, requires that all new development within the wildland/urban interface area have fuel-modified defensible space. The proposed project would include the required 100-foot fuel modification zones.
6. Fencing, barriers, or functional edge treatment and signage will be required for all new or modified	Consistent. The proposed project would include safety fencing along the Project Trail Segments that follow the eastern project site boundary and would generally serve as a barrier between the

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
projects developed on lots abutting (or effectively adjacent to) Preserves and shall be designed to prevent intrusion of domestic animals and people into the Preserve.	project site and adjacent open space area. However, the proposed Project Trail Segment would connect to an existing trail to the east of the project boundary in one area which would allow pedestrian access to the adjacent open space area. Additionally, as discussed in Section 3.3, Biological Resources, the proposed project would be required to implement a homeowner education program to inform homeowners of the need to keep pets out of adjacent open space.
City of San Diego General Plan	
Land Use Element	
LU-B.3: Plan for and develop mixed-use projects where a site or sites are developed in an integrated, compatible, and comprehensively planned manner involving two or more land uses.	Not Applicable. The proposed project would be a mixed-use project that includes residential development. However, the portion of the proposed project within the City of San Diego only consists of recreational uses and does not include residential units. City of San Diego land use authority extends to the 64-acre portion of the golf course located within the City of San Diego. Carlton Oaks is processing a site development permit with the City of San Diego for the 64-acre site to remodel the golf course. The commercial and residential uses are located within the City of Santee and would be regulated by the City of Santee's <i>General Plan</i> and zoning requirements.
Urban Design Element	
UD-A.2: Use open space and landscape to define and link communities.	Consistent: The proposed project would include construction of trail segments on the project site, providing linkages with the surrounding communities through existing and planned trails to the east and west of the project site. All parkways would be landscaped with a combination of trees, shrubs, and groundcover. The proposed project would promote the use of the San Diego River Trail, which provides access to Mission Trails Regional Park to the west and the Santee Town Center to the east, by designing the proposed project to complement the San Diego River Trail both functionally and aesthetically, including by providing direct access for users of the trail. In addition, by maintaining the golf course as designated open space, which complements the adjacent MHPA, the project is continuing to provide an open space linkage that connects Mission Trails Regional Park in the west to the San Diego River and Mast Park in the east.
UD-A.3: Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.	Consistent. The proposed project has been designed in a manner that would enhance San Diego River by sensitively designing the project around the surrounding natural resource areas. Specifically, the project would widen and enhance the stream course in some areas, increase the functionality of the river, and restore the surrounding vegetation. The redesign of the golf course that would be within and adjacent to the City of San Diego MHPA would be required to be consistent with the Land Use Adjacency Guidelines. Additionally, the landscaping associated with the proposed project would complement the adjacent Carlton Oaks Golf Course segment of San Diego River. The plant palette would be composed of a diverse range of textural and flowering

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
	species, including durable, elegant, low-water, drought-tolerant plants. Evergreen trees and shrubs are proposed to soften architectural façades and site walls. Native vegetation would be planted around the river buffer, which would prevent nonnative grasses from encroaching on the riparian habitat and would filter potential urban runoff.
UD-A.8: Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.	Consistent. Landscaping is proposed to be used to complement the unique neighborhood identity of Carlton Oaks. Newly planted trees would improve air quality on the site and create visual appeal. Evergreen trees and shrubs are proposed to soften architectural façades and site walls. Trees would also be used to create shade and scale throughout the community, including at the various recreational spaces. Planting native species around the riparian buffer would enhance the natural features of the area and support water-management goals by providing erosion control and a filtration system for urban runoff.
Economic Prosperity Element	
EP-I.3: Support destination attractions in San Diego that enhance tourism trade in the City including but not limited to natural resource destinations, commercial recreational attractions, sporting events, convention and meeting facilities, and the cruise ship industry.	Consistent. The proposed project would enhance tourism options in the area through the innovative redesign of the Carlton Oaks Golf Course, which allows for the development of two gated residential neighborhoods, a hotel, an improved golf course clubhouse and pro shop, and golf driving range. Additional enhanced open space areas and community recreational areas would also make the area more appealing as a natural resource destination. The proposed project would include construction of trail segments on the project site, providing linkages with existing and planned trails to the east and west of the project site. The project would also accommodate and not preclude future segments of the SANDAG San Diego River Trail multiuse regional trail system, which could be used by the public at large.
Public Facilities, Services, and Safety Element	
PF-G.2: Install infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies.	Consistent. The proposed project would include planting vegetation around the San Diego River buffer to capture and minimize urban runoff from reaching the river.
Recreation Element	
RE-D.6: Provide safe and convenient bicycle, pedestrian, and micromobility linkages to, and within, park and recreation facilities and open space areas.	Consistent. The proposed project would include internal circulation pathways connecting resort facilities and residential areas, ingress/egress connections that would accommodate linkages planned by SANDAG, and would not preclude linkages planned by City of San Diego.

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Goal, Policy, Objective	Proposed Project Consistency
RE-D.7: Provide public access to open space for recreational purposes.	Consistent. In addition to the golf course, enhanced open space areas and community recreational areas would also make the area more appealing as a natural resource destination. The proposed project would include construction of trail segments on the project site, providing linkages with existing and planned trails to the east and west of the project site. The project would also accommodate and not preclude future segments of the SANDAG San Diego River Trail multiuse regional trail system, which could be used by the public at large.
RE-F.3: Provide for sensitive development of recreation uses within and adjacent to City-owned open space lands.	Consistent. The proposed project would not encroach on adjacent open space land or on the Carlton Oaks Golf Course segment of San Diego River. No development would be proposed on City of San Diego-owned open space lands but the open space would be landscaped. Previously described landscaping would enhance and preserve the City of San Diego-owned open space.
RE-F.7: Encourage the planning and coordination of river parks to provide public recreational opportunities, protect natural resources, and enhance community character.	Consistent. The proposed project has been designed in a manner that would be compatible with the San Diego River and in a manner that would enhance community character. When project land uses are in close proximity to the protected habitat along San Diego River, these areas of would follow applicable Land Use Adjacency Guidelines (e.g., appropriate lighting, noise, and public access control). In addition, the project's <i>Biological Resources Report</i> (Appendix E) addresses measures that protect the river environment, including protection of riparian habitat and protected species. Where impacts were identified, measures were proposed to minimize those impacts.
Conservation Element	
CE-A.11: Implement sustainable landscape design and maintenance.	Consistent. The plant palette would be composed of evergreen trees and other low-water plants. At least 90% of the plant materials selected for non-turf areas would be drought-tolerant and require minimal water once established. All turf would be warm-season or drought-tolerant turf adaptable to the region. Impervious surface would be reduced on the project by planting trees and shrubs on all setbacks and parkways. Irrigation systems would include sustainable design features, including the spacing of sprinkler heads to provide head-to-head coverage, avoid runoff, and eliminate over spray into non-landscaped areas. Irrigation systems would be equipped with a rain-shutoff device and a backflow-prevention device.
CE-B.1 Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.	Consistent. The proposed project would be implemented in a manner that would enhance the San Diego River by sensitively designing the project around the surrounding natural resource areas. The project would widen and enhance the stream course in some areas, increase the functionality of the river, and restore the surrounding vegetation. The proposed updates to the golf course have been thoughtfully designed to follow the contours of the existing natural topographical features of the San Diego River valley. Of the new golf holes, 12 would maintain the original contours, and all 18 holes would maintain the characteristics of the existing contours, drainage,

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Goal, Policy, Objective	Proposed Project Consistency
	and floodway and, most importantly, protect natural drainage patterns. Additionally, these contours would respect the interior Sycamore Canyon Creek area that flows through the center of the golf course. The majority of the proposed grading for the golf course has been designed around the existing natural creek. Only a few limited areas of the creek would be temporarily affected by the construction of the golf course; however, the project will not only restore and enhance these areas, but also widen the natural drainage.
CE-B.5 Maximize the incorporation of trails and greenways linking local and regional open space and recreation areas into the planning and development review processes.	Consistent: The proposed project would include construction of trail segments on the project site, providing linkages with existing and planned trails to the east and west of the project site. The proposed project would include an interconnected system of golf cart paths, a multiuse path, sidewalks to connect resort facilities and residential areas, and ingress/egress connections that would accommodate linkages planned by SANDAG (i.e., the San Diego River Trail) and the City of Santee. In addition, all parkways would be landscaped with a combination of trees, shrubs, and groundcover.
Mission Trails Design District	
Policy: New development should relate to the park and existing landscaping in the park.	
A. New developments shall maintain contiguous public access immediately adjacent to the park edge or boundaries.	Consistent. Public open space areas would be provided between Subarea 3 and development associated with the proposed project. A multipurpose, public trail would be provided on the property on the northern side of the San Diego River, linking with existing and planned trails to the east and west of the project site.
B. New development immediately abutting the park should provide open space linkages, bike/pedestrian (and equestrian if in East Elliott) access to the park.	Consistent. The proposed project would include circulation pathways connecting residential, hotel, and recreational buildings to the park's boundary path. A multipurpose, public trail for bike and pedestrian access would also be provided on the property on the northern side of the San Diego River, linking with existing and planned trails to the east and west of the project site; none of which are located within the East Elliot Community Plan and no equestrian access would be required. In the western portion of the site, the trail segment will be constructed beginning at the Santee jurisdictional line ending at the property line (Station 38+60) and link to the future planned trail known as the Carlton Oaks Golf Course Segment. A graded bench (located within the Carlton Oaks Golf Course Segment) would also be provided within the easement areas that will be granted to the applicant by the City of San Diego as a part of this project. In the eastern portion of the site, an onsite trail segment will traverse through the resort to Carlton Oaks Drive and will extend the offsite Mast Park West Trail (east of the project boundary to the south to the property line), as well as link to the future planned trail known as the Carlton Oaks Golf Course Segment.
C. New landscaping should complement the park's existing plant palette in terms of color and shape to	Consistent. The golf course landscape has been designed to remain as consistent as possible with the existing vegetation and native vegetation of the area while considering the requirements

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Goal, Policy, Objective	Proposed Project Consistency
create a landscaping transition between the park and the built environment as well as serve as a visual extension of the park. Every landscape plan shall include a design statement explaining how the landscape plan relates to the Regional Park plant environment.	of the golf course. The landscaping plan would include details regarding how the plan relates to the Regional Park plant environment. As stated on the landscape plan, the landscape design complements the architectural styling of the community while providing a series of open space amenities to meet the recreational needs of the residents. The plant palette is composed of durable, elegant, and low water use/drought-tolerant plants that are easily maintained. The palette is composed of a diverse range of textural and flowering species. The inclusion of native trees, shrubs, and groundcover in the plant palette complements the existing plants of Mission Trails Regional Park and helps to provide a cohesive transition between the park and the proposed community. Evergreen trees and shrubs are proposed to soften architectural facades and site walls. Trees will also be used to create shade and scale throughout the community, including at the various amenity spaces.
D. Architectural materials and colors for new development should be designed to blend into the natural backdrop of the Mission Trails Regional Park to provide a transition from the park. Architectural materials should be chosen to complement the Regional Park environment, and natural materials such as flagstone, river rocks, wood and tile should be considered for a portion of the facade. Architectural colors for exterior facades should be chosen from the color palette of the natural soil, rocks and plant life from the Regional Park. Extreme color selections should be avoided. Exterior accent colors should be chosen from the existing park environment	Not Applicable. The proposed project does not propose any structures within the City of San Diego, and therefore this policy does not apply.
Policy: The San Diego River Areas Adjacent to Mission Trails Regional Park Should Provide Visual Linkages to and From The Park and Implement the San Diego River Park Master Plan.	
A. The following design principles shall apply to the western and eastern Mission Gorge and San Diego River Park area within Subarea 3 of the Mission Trails Design District:	
1) Boundaries: The San Diego River Park Subdistrict includes the River Corridor Area and the River Influence Area. The River Corridor Area comprised of the current 100-year floodway (floodway) as mapped by Federal Emergency	Consistent. Sixty-four acres of the golf course would be located within the River Corridor Area and the River Influence Area, as defined in Policy A1.

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<p>Management Agency (FEMA) and the 35-foot wide Path Corridor on each side of the floodway. The River Influence Area is the 200-foot wide area extending outward from the River Corridor Area on each side of the river, as illustrated in Diagram 1.</p>	
<p>2) River Corridor Area: Permitted Uses and Development: Development within the floodway shall be in accordance with Land Development Code Section 143.0145 (Development Regulations for Special Flood Hazard Areas).</p> <p>Within the 35-foot wide Path Corridor only the following development shall be allowed: the multi-use San Diego River Pathway, trails, and passive recreational uses, as determined by the City Manager, including picnic areas, scenic or interpretive overlooks, fitness stations, seating and educational exhibit areas.</p> <p>Within locations that are not mapped as Multi-Habitat Planning Area (MHPA), as identified by the City of San Diego MSCP Subarea Plan, or determined to be wetland buffers in accordance with Land Development Code Section 143.0141, the following development shall be allowed; children's play areas, multi-purpose courts, turf fields and development determined by the City Manager to be for active recreation use. Portions of the 35-foot wide Path Corridor that are mapped as MHPA, as identified by the City of San Diego MSCP Subarea Plan, or determined to be wetland buffers in accordance with Land Development Code Section 143.0142 shall be developed in accordance with the MSCP Land Use Considerations and the Environmentally Sensitive</p>	<p>Consistent. The proposed project would comply with the permitted uses and design criteria in the River Corridor Area. City of San Diego land use authority extends to the 64-acre portion of the golf course located within the City of San Diego. Carlton Oaks is currently processing a site development permit with the City of San Diego for the 64-acre site to remodel the golf course. The proposed project would include construction of trail segments on the project site, providing linkages with existing and planned trails to the east and west of the project site. The proposed project also would not preclude the development of the Carlton Oaks Section of the San Diego River Trail, which SANDAG has designed. The golf course landscape was designed to remain as consistent as possible with the existing vegetation and native vegetation of the area while considering the requirements of the golf course. Project lighting would be shielded and directed away from San Diego River to avoid spillover into the adjacent riparian habitat. Site furniture, including bench seating and picnic tables, would be provided adjacent to the trail segment in the western portion of the project site. Safety fencing, approximately 10 feet tall, would be constructed along the trail segment adjacent to the golf course to protect trail users from the golf course.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>Lands Regulations in Chapter 14, Article 3, Division 1 of the Land Development Code.</p> <p>Grading: Grading within the floodway shall be conducted in accordance with MSCP Land Use Considerations and the Environmentally Sensitive Lands Regulations in Chapter 14, Article 3, and Division 1 of the Land Development Code.</p> <p>Grading within the 35-foot wide Path Corridor shall, to the satisfaction of the City Manager; i) Avoid long continuous engineered slopes with hard edges; ii) provide gradual transitions at the top and bottom of the slopes; iii) and stabilize and revegetate slopes native plants found in the immediate vicinity to the satisfaction of the City Manager.</p> <p>(c) San Diego River Pathway: Development on a lot located wholly or partially in the River Corridor Area shall include a San Diego River Pathway and shall meander to the satisfaction of the City Manager.</p> <p>Where portions of the Path Corridor are mapped as MHPA, as identified by the City of San Diego MSCP Subarea Plan, or determined to be wetland buffers in accordance with Land Development Code Section 143.0141, the San Diego River Pathway shall be located outside the MHPA and the wetland buffer, immediately adjacent to the Path Corridor. See Diagram 2, Path Corridor Realignment for MHPA and Wetland Buffer.</p> <p>The San Diego River Pathway shall be dedicated with an easement that allows public access and shall be completed in the first phase of any phased development.</p>	

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>The San Diego River Pathway shall include the following features:</p> <p>A minimum 10-foot wide pathway of concrete or similar material, in a color that blends with the surrounding native soil.</p> <p>A minimum two-foot wide area of decomposed granite or similar material along each side of the San Diego River Pathway in a color similar to the San Diego River Pathway.</p> <p>A minimum 10-foot wide landscape area between the floodway and the San Diego River Pathway.</p> <p>A minimum 12-foot vertical clearance above finished grade of the San Diego River Pathway.</p> <p>In areas east of Mission Trail Regional Park, the San Diego River Pathway may be provided as a 10-foot wide soft surface material in a color that blends with the surrounding native soil.</p> <p>(d) Trails: Pedestrian-only trails may be located within the River Corridor Area as follows:</p> <p>i) Trail alignments shall mimic natural conditions and minimize grading and disturbance to vegetation.</p> <p>ii) Trails shall be designed to provide continuous loops to the San Diego River Pathway, with no trail alignment resulting in a dead end.</p> <p>iii) Trails located in areas mapped MHPA, as identified by the City of San Diego MSCP Subarea Plan, or determined to be wetland buffers in accordance with Land Development Code Section 143.0141are subject to the MSCP Land Use Considerations and the Environmentally Sensitive</p>	

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>Lands Regulations in Chapter 14, Article 3, and Division 1 of the Land Development Code.</p> <p>Trails shall include the following features: aa) A maximum eight-foot width; bb) An eight-foot vertical clearance above finish grade of the trail; and cc) Surface material shall be decomposed granite or similar material in a color that blends with the surrounding native soil.</p> <p>(e) Picnic Areas and Overlooks: Development on a lot located wholly or partially in the River Corridor shall include at least one picnic area or overlook along the San Diego River Pathway unless either exists less than one-half mile away. Picnic areas and overlooks shall include a combination of site furniture, such as picnic tables, trash and recycling receptacles, bicycle racks, shade structures, benches, interpretive signs and drinking fountains, to the satisfaction of the City Manager.</p> <p>(f) Lighting: Shall be provided along the San Diego River Pathway as necessary to provide for security and personal safety. Light poles shall not exceed 12 feet in height. All lighting shall be shielded and directed away from the floodway, the edge of the San Diego River Pathway fronting the river and the MHPA.</p> <p>(g) Site Furniture: Shall be designed in accordance with the San Diego River Park Master Plan Design Guidelines and include the San Diego River Park Logo. Shall be provided along the San Diego River Pathway at picnic areas, overlooks and other locations that complement the San Diego River Pathway. Lots that do not have picnic areas or overlooks shall include along the San Diego River Pathway a minimum of one piece of site furniture</p>	

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>for every 200 linear feet of the San Diego River Pathway.</p> <p>(h) Signs: Shall be designed in accordance with the San Diego River Park Master Plan Design Guidelines and shall include the San Diego River Park Logo. Overlooks shall include, at a minimum, one interpretive sign. Information Kiosks (as described in the San Diego River Park Master Plan Design Guidelines) shall be provided at any location where the San Diego River Pathway intersects a public street.</p> <p>(i) Fences: Located between the San Diego River Pathway and the River shall be provided only as required to protect sensitive habitat or historic resources, and shall allow for wildlife movement. Fences shall be in accordance with the following:</p> <p>i) Located a minimum of five feet from the San Diego River Pathway or trails and shall follow the natural grade.</p> <p>ii) Consist of horizontal rails of either wood peeler log or steel posts and cables, shall not exceed 42 inches in height and shall be at least 75 percent open.</p> <p>iii) For purposed of this Section, chain link fencing shall not qualify as a 75 percent open fence.</p> <p>(j) Plant Materials: Shall include a mixture of native plants and trees consistent with the surrounding habitat type. Non-native grasses and lawn areas shall not be permitted in any areas mapped MHPA, as identified by the City of San Diego MSCP Subarea Plan, or determined to be wetland buffers</p>	

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>in accordance with the Land Development Code Section 143.0141.</p> <p>(k) Visual Openings: Views within the River Corridor Area shall be maintained at the pedestrian level along the San Diego River Pathway by using tall canopy trees, rather than short bushy trees. Plant materials shall be selected and located in order to provide views to the river along at least 50 percent of the river side of the San Diego River Pathway of each lot.</p> <p>(l) Plant Material Adjacent to the San Diego River Pathway: On the river side of the San Diego River Pathway and within 10 feet of the non-river side of the San Diego River Pathway:</p> <p>i) Trees shall have a canopy clearance of eight feet above the finish grade of the San Diego River Pathway.</p> <p>ii) All other plant materials shall not exceed a mature and natural growth habit of 30 inches in height above the finish grade of the San Diego River Pathway.</p>	
<p>3) River Influence Area</p> <p>Buildings Height and Massing: Maximum building height and massing on lots adjacent to the River Corridor Area shall be determined by the distance the building is set back from the River Corridor, and shall in compliance with Table 1 or the base zone, whichever is more restrictive, See Diagram 3, River Influence Area Maximum Building Height and Setback.</p>	<p>Consistent. No structures are proposed within the 64-acre portion of the golf course located within the City of San Diego. Any new signs, fencing, lighting, or plants included in the proposed project within the River Influence Area would comply with the Mission Trails Design District policies. Specifically, plant materials within 15 feet of the River Corridor Area would be noninvasive, low-water use species. All lighting within the golf course would be compliant with the City of San Diego Outdoor Lighting Regulations Section 142.0740 (f), so that any exterior lighting would be limited to low-level lights and shielded to minimize the amount of light entering adjacent sensitive biological resource areas.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>Where river and street setbacks overlay, the requirements of the River Corridor Area setback shall apply.</p> <p>Buildings shall be set back a minimum of 10 feet from the River Corridor Area. Architectural features such as eaves, cornices, eyebrows, trellises, bay window balconies, entry roofs and arbors, and fireplaces may extend a maximum of 4 feet into the 10-foot setback.</p> <p>Setbacks not identified in Table 1: Refer to the Base Zone.</p> <p>Off Setting Planes: Refer to the Base Zone.</p> <p>Building Façade and Entrance: Development that abuts the River Corridor Area shall provide a river-fronting façade and entrance that are of substantially equivalent design and quality of materials as the primary building façade and entrance to the satisfaction of the City Manager.</p> <p>Building Transparency: Building facades that front the River Corridor Area or building facades that front a street that abuts and runs parallel to the River Corridor Area shall provide building transparency in accordance with the following:</p> <p>The amount of transparency, measured as the visible light transmittance (VLT) shall be at least 0.65 VTL.</p> <p>Commercial and Mixed Use Zones, a minimum of 50 percent of the total façade shall be transparent and a minimum of 70 percent of the ground floor (between finish grade and the full height of the first floor) shall be transparent.</p>	

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>Industrial Zones a minimum of 25 percent of the total façade shall be transparent.</p> <p>Building Reflectivity: Building facades that front the River Corridor Area shall not include materials with a visible light reflectivity (VLR) factor greater than 10 percent.</p> <p>Exterior Equipment Enclosures, Outdoor Storage, Loading Areas and Refuse Collection Areas: Shall be in accordance with the following:</p> <p>Located a minimum of 100 feet from the River Corridor Area.</p> <p>Screened with landscape and an opaque wall at least 6 feet in height or, if the item to be screened exceeds 6 feet in height, a wall one foot taller than the item to be screened, to a maximum height of 10 feet, shall be provided. Screening shall be of the same design and materials as the primary building façade.</p> <p>Loading areas shall also comply with the requirements of Land Development Code Section 1514.0403(d) Off Street Freight Loading Spaces Required.</p> <p>Off-Street Surface Parking: Off-street surface parking areas located adjacent to the River Corridor Area shall be set back and screened for the full height and length of the parking area, with one or more of the following:</p> <p>i) Shall be screened with residential, commercial, industrial, or mixed use development in accordance with the base zone: or</p> <p>ii) Screened with landscape materials, in which case the following shall apply: aa) Parking shall be</p>	

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>setback a minimum of 20 feet from the River Corridor Area; bb) Parking areas adjacent to the River Corridor Area shall not exceed 30 percent of the length of the lot frontage along the River Corridor Area or a maximum of 120 feet of the lot frontage along the River Corridor Area, whichever is less; cc) Parking areas shall be screened with shrubs capable of achieving a minimum height of 30 inches along 80 percent of the length of the parking area along the River Corridor Area frontage within a 2 year period, except that screening shall not be required at pedestrian access points; and dd) Screening for parking areas shall include one 24-inch box evergreen tree for every 30-foot of frontage along the River Corridor Area. The trees shall be spaced apart or in naturalized groupings.</p> <p>(j) Streets that Abut and Run Parallel to the River Corridor Area: Shall be the minimum width necessary consistent with the Street Design Manual of the Land Development Manual and shall be designed to minimize the number of curb cuts to the satisfaction of the City Manager. On-street parking shall be provided in clusters of parking bays along the river side of the street.</p> <p>(k) Building Access to the River Corridor Area: Development on lots that abut the River Corridor Area shall provide building access paths connecting the primary structure with the San Diego River Pathway in accordance with the following:</p> <p>i) One building access pathway for every 300 linear feet of river frontage.</p> <p>ii) The building access pathway shall be to the primary building entrance or to a secondary</p>	

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>entrance that, to the satisfaction of the City Manager, is designed to the same quality as the primary entrance.</p> <p>(l) Public Access Pathway Across a Development Site: Development on lots that abut the River Corridor Area shall provide public access pathways connecting the public street and the San Diego River Pathway in accordance with the following:</p> <p>i) At least one public access pathway shall be provided for every 1,000 linear feet of frontage along the River Corridor Area.</p> <p>ii) The public access pathway shall be designed to the same quality as the primary on site pathways, to the satisfaction of the City Manager.</p> <p>iii) A public access pathway sign shall be provided at the public street and at the intersection of the San Diego River Pathway to identify the entry to the public access pathway and shall be placed in a clearly visible location.</p> <p>iv) An easement for public use shall be required for public access pathways.</p> <p>(m) Public Access Pathways from Streets that Abut and Run Parallel to the River Corridor Area: Public access pathways shall connect the street to the San Diego River Pathway at every street intersection, and at a minimum, provide a connection every 1,000 linear feet of street frontage along the River Corridor Area.</p> <p>(n) Lighting: All lighting within 100 feet of the River Corridor Area shall be shielded and directed away from the River Corridor Area.</p>	

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>(o) Fences: Within the 10-foot building setback area, only the following fences are permitted:</p> <ul style="list-style-type: none"> i) A solid fence not to exceed three feet in height. ii) A fence that is at least 75 percent open and does not exceed 6 feet in height. iii) A combination of a 3-foot tall solid fence topped with a 3-foot tall fence that is at least 75 percent open fence. iv) For purposes of this Section, chain link fencing shall not qualify as a 75 percent open fence. <p>(p) Signs:</p> <ul style="list-style-type: none"> i) Within 100 feet of the River Corridor Area, wall signs fronting the river shall not exceed a height of 15 feet above finish grade. ii) Ground signs between a building and the River Corridor Area shall be monument signs not to exceed five feet in height and shall be located within a landscaped area at least equivalent to the area of the sign face. iii) Signs fronting the River Corridor Area shall be face lighted or internally lighted. <p>Plant Material: Plant materials within 15 feet of the River Corridor Area shall be non-invasive low water use species.</p>	
<p>B. The City-owned portion of the eastern Mission Gorge area within Subarea 3 of the Mission Trails Design District should be retained as an open space linkage to the Regional Park, and for future inclusion in the San Diego River Regional Park System.</p>	<p>Consistent. Sixty-four acres of the project site within Subarea 3 of the Mission Trails Design District are currently developed as a golf course and would remain as that use.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
East Elliott Community Plan	
1. Through feasibility study and associated environmental document determine the best location for the San Diego River Pathway connecting Mission Trails Regional Park to the City of Santee, along with connections to West Hills Parkway. Include in the study where a completely soft surface trail could be provided separate from the paved pathway to accommodate variety of users.	Consistent. SANDAG has designed, and been approved to construct, the Carlton Oaks Golf Course segment of the San Diego River Trail. The project would accommodate public access to the SANDAG Carlton Oaks Golf Course segment of the San Diego River Trail and would not preclude linkages planned by City of Santee. The proposed project would include construction of trail segments on the project site, providing linkages with existing and planned trails to the east and west of the project site.
2. Land not currently used as golf course should be set aside for open space or the river pathway with an easement that allows for public access on private land.	Consistent. The proposed project would include construction of trail segments on the project site, providing linkages with existing and planned trails to the east and west of the project site. Land south of the existing golf course within City of San Diego would also be retained as open space, including an easement for the future planned SANDAG public trail.
3. Connect the City of San Diego River Pathway to the City of Santee River Pathway and provide a trail kiosk to identify the connection.	Consistent. As discussed above, the proposed project would accommodate access to the future planned SANDAG Carlton Oaks Golf Course segment of the San Diego River Trail. The proposed project would include construction of trail segments on the project site, providing linkages with existing and planned trails to the east and west of the project site.
4. Capitalize on existing tree galleries in golf course to create a buffer along the river and remove exotic vegetation from the river corridor.	Consistent. Trees along the San Diego River Trail would be avoided during project construction and retained post-project. Native bunch grasses and saltgrass would be planted as a buffer around the river in order to prevent Bermuda grass from encroaching into riparian zones. Trees would also be planted outside of the eastern portion of the river corridor.
5. Construct the San Diego River Park Pathway from Carlton Oaks Golf Course, extending west under West Hills Boulevard and SR-52, to connect to Mission Trails Regional Park trail system.	Not Applicable. This policy applies to the City of San Diego and not to the proposed project. Implementation of the proposed project would not impede or conflict with this policy, nor preclude linkages planned by City of San Diego. As discussed above, the proposed project would accommodate public access to the future planned SANDAG Carlton Oaks Golf Course segment of the San Diego River Trail. The proposed project would include construction of trail segments on the project site, providing linkages with existing and planned trails to the east and west of the project site.
East Elliott Community Plan – Open Space Management Guidelines	
1. Natural open space areas should remain undeveloped with disturbance limited to trails and passive recreational uses such as walking, hiking	Consistent. No sensitive natural resources or natural open space areas would be disturbed within the City of San Diego, including area within the East Elliott Community Plan area. The area within the East Elliott Community Plan Area is designated as “open space,” but it is an existing golf course, not natural open space.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>and nature study that are consistent with preservation of natural resources.</p> <p>2. More active recreation uses, including horseback riding and mountain biking, may also be permissible if measures are taken to ensure that biological values are not threatened.</p> <p>3. Public access to limited areas of particularly sensitive natural open space could be restricted. Examples of locations where access could be controlled include vernal pool areas and identified nesting areas for endangered or threatened animal or bird species.</p> <p>4. Additional recreational uses may be appropriate along the preserve edge or in the relatively limited open space areas that do not contain sensitive habitat and wildlife. In these areas, horticultural and gardening uses could be permitted on a case-by-case basis. Such uses should not involve construction of permanent structures or paved areas.</p> <p>5. Open space areas which cover an entire ownership should be preserved through means that include, but are not limited to, acquisition by the City with state and federal assistance or by other large property owners as mitigation lands for environmental impacts anticipated on other properties.</p> <p>6. Open space areas which cover portions of an ownership and where reasonable development rights still exist on portions of the ownership, should be dedicated by the owner/developer, through an open space/conservation easement. Long-term maintenance should be provided on an individual basis or by an open space management entity that may be formed to implement the MSCP.</p> <p>7. Disturbed areas designated for open space should be recontoured where feasible, to recreate the natural</p>	<p>The project does not propose new recreational uses. Existing recreational uses would be renovated and enhanced but would not include new uses. The proposed project is consistent with the allowed uses per the lease agreement.</p> <p>Sensitive natural open space areas are not being directly impacted by the proposed project. In order to avoid indirect impacts in areas where the golf course is adjacent to natural open space and MHPA areas, the project would be required to comply with the City's MSCP Subarea Plan Land Use Adjacency Guidelines and implement mitigation measures. Indirect impacts would be reduced through implementation of mitigation measures that address indirect human activity, water quality, fugitive dust, etc.</p> <p>The open space area is an existing golf course it is not natural open space or a sensitive open space area. The golf course is adjacent to sensitive natural open space areas within the MHPA, but this area is owned by the City of San Diego and would not be impacted by the proposed project.</p> <p>The proposed updates to the golf course have been thoughtfully designed to follow the contours of the existing natural topographical features of the San Diego River valley. Of the new golf holes, 12 would maintain the original contours, and all 18 holes would maintain the characteristics of the existing contours, drainage, and floodway and, most importantly, protect natural drainage patterns. Additionally, these contours will respect the interior Sycamore Creek area that flows thorough the center of the golf course. The majority of the proposed grading for the golf course has been designed around the existing natural creek, which currently runs through the center of the golf course. Only a few limited areas of the creek will be temporarily impacted by the construction of the golf course; however, the project will not only restore and enhance these areas but widen the natural drainage in this area.</p> <p>The MSCP Plan and the California Essential Habitat Connectivity Project determined that the main wildlife linkage from northern Santee is through the large upland open spaces of East Elliott into Mission Trails. The proposed project would allow for local wildlife movement out of Sycamore Canyon Creek to the east through the golf course (Cross-Section H) and to the southeast along the San Diego River (South Channel) and into the golf course (Cross Section K). With the proposed project, a road would be constructed in the golf course between Residential North and the clubhouse, with a bridge over the San Diego River (North Channel). The area under the bridge would vary between 5 and 12 feet, with 90% of the length being 8 feet or greater in height. Assuming a bridge deck length of 265 feet, deck width of 36 feet (30 feet of travel lanes and 6 feet of trail), and a conservative average clearance of 8 feet, this would result in an openness ratio of 300:1, which would be tall and open enough to accommodate even the largest expected</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<p>topography. These areas should also be restored or enhanced where feasible with natural vegetation to return these areas to a natural appearance.</p> <p>8. At locations where roads, railroads or other urban intrusions traverse open space corridors, provisions should be made to minimize habitat fragmentation and to provide for a continuous open space linkage. In some instances, structures such as bridges or culverts should be sited in lower quality habitat or in disturbed areas to the extent possible.</p> <p>9. Transition areas should be established between urban uses and the open space system, along traffic corridors and canyon overlooks, where feasible and appropriate. Such transition areas may be developed by providing additional maintenance and planting noninvasive grass, shrubs and trees that provide a sensitive transition between uses.</p>	<p>or potential species (i.e., mule deer, mountain lion, coyote), and certainly any smaller species (e.g., bobcat, gray fox). The structure will become inundated during 100-year flood flows, but it will still provide ample opportunity for wildlife movement in this otherwise constrained area.</p> <p>A 10-foot-wide strip of planted native vegetation would be established along the south side of the golf course adjacent to the MHPA in order to separate all golf course turf from riparian areas. This buffer zone will be planted with native bunch grasses, which will contain the Bermuda grass within the playable golf boundary. The buffer zones are noted on the Grassing Plan for the golf course.</p>
San Diego River Park Master Plan	
<p>A. Coordinate with Caltrans to identify potential alignment and methods to create the San Diego River Pathway under State Highway 52.</p>	<p>Not Applicable. This policy applies to the City of San Diego and not to the proposed project. Implementation of the proposed project would not impede or conflict with this policy, nor preclude linkages planned by City of San Diego.</p>
<p>B. Through a feasibility study and an associated environmental document determine the best location for the San Diego River Park Pathway connecting Mission Trails Regional Park to the City of Santee, along with connections to West Hills Parkway. Include in the study where a soft surface trail could be provided separate from the paved pathway to accommodate a variety of users.</p>	<p>Consistent. As discussed above, the proposed project would accommodate public access to the SANDAG Carlton Oaks Golf Course segment of the San Diego River Trail. The proposed project would include construction of trail segments on the project site, providing linkages with existing and planned trails to the east and west of the project site.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
C. Initiate a dialogue with Carlton Oaks Golf Course to explore the potential to evolve the golf course edge into a naturalized landscape buffer with native plant species and a vegetation management plan that removes exotic plants. The buffer should be designed to provide habitat, as well as an infiltration device to treat the golf course surface runoff before it goes into the river.	Consistent. The City of Santee, the City of San Diego, Lennar Corporation, and Carlton Oaks Golf Resort would work together to avoid, minimize, reduce, compensate, or otherwise mitigate for impacts on sensitive riparian and wetland vegetation communities through re-establishment, restoration, and/or enhancement and preservation of habitat. Native bunch grasses and saltgrass would be planted as a buffer around the river in order to prevent Bermuda grass from encroaching into riparian zones. Trees would be planted outside of the eastern portion of the river corridor. The proposed project includes a Restoration Plan (currently pending). As part of the Restoration Plan, areas where sensitive vegetation communities have been restored and/or enhanced would be monitored for at least 5 years. Restoration would follow the City of San Diego's General Outline for Conceptual Revegetation/Restoration Plans in its <i>Land Development Code</i> (City of San Diego 2018 or other format determined by the City of Santee. In addition, an SWPPP would include BMPs for minimizing runoff into the river. New development areas have been designed to drain into on-site water-detention basins and not flow directly into the habitat preserves.
D. Look at opportunities to restore the natural open space adjacent to the river if the golf course were to change in the future and the site is redeveloped into a new use.	Not Applicable. This land use policy applies to the City of Santee and City of San Diego and not to the proposed project. In addition, the project would retain and renovate the golf course and would not involve a change in use for that portion of the project site.
E. Provide a kiosk at the boundary of the City of San Diego and the City of Santee that identifies the eastern entrance of the San Diego River Park.	Not Applicable. SANDAG has designed and been approved to construct the Carlton Oaks Golf Course segment of the San Diego River Trail. For details, please refer to the <i>Final Initial Study/Mitigated Negative Declaration for the San Diego River Trail – Carlton Oaks Golf Course Segment</i> (SANDAG 2017). As discussed above, the proposed project would accommodate public access to the future planned SANDAG Carlton Oaks Golf Course segment of the San Diego River Trail. The proposed project would include construction of trail segments on the project site, providing linkages with existing and planned trails to the east and west of the project site.
Gillespie Field Airport Land Use Compatibility Plan	
Land use actions in Review Area 2 require Airport Land Use Commission review if: <ul style="list-style-type: none"> Any object which has received a final notice of determination from the FAA that the project will constitute a hazard or obstruction to air navigation, to the extent applicable. 	Consistent. The highest building proposed as part of the project would be the country club and resort clubhouse building, which would be two stories and approximately 38 feet high. Construction activities may require a crane that would be up to 60 feet tall. These structures could interfere with aircraft flight or communication; as such, the proposed project was required to obtain FAA approval indicating that the project structures would be safe (Appendix I). The proposed project would not create additional open space and would be not expected to cause an increase in the attraction of birds or other wildlife.

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<ul style="list-style-type: none"> Any proposed object in an area of terrain penetration to airspace surfaces which has a height greater than 35 feet above ground level. Any project having the potential to create electrical or visual hazards to aircraft in flight, including electrical interference with radio communications or navigational signals; lighting which could be mistaken for airport lighting; glare or bright lights (including laser lights) in the eyes of pilots or aircraft using the Airport; certain colors of neon lights—especially red and white—that can interfere with night vision goggles; and impaired visibility near the Airport. Any project having the potential to cause an increase in the attraction of birds or other wildlife that can be hazardous to aircraft operations in the vicinity of the Airport. The local agency should coordinate with the airport operator in making this decision. 	
<p>Developers of new residential development projects within the overflight notification area shall record an overflight notification document as condition of development approval.</p>	<p>Consistent. The project site would be within the Overflight Notification Area. As such, the applicant would disclose the appropriate overflight notification to the City of Santee.</p>
<p>Marine Corps Air Station Miramar Land Use Compatibility Plan</p>	
<p>Within Review Area 2, only the following actions affecting land uses require ALUC review:</p> <ul style="list-style-type: none"> Any object which has received a final notice of determination from the FAA that the project will constitute a hazard or obstruction to air navigation, to the extent applicable. Any proposed object in a High Terrain Zone having a height of greater than 35 feet above ground level. 	<p>Consistent. The highest building proposed as part of the project would be the country club and resort clubhouse building, which would be two stories and approximately 38 feet high. Construction activities may require a crane that would be up to 60 feet tall. These structures could interfere with aircraft flight or communication; as such, the proposed project was required to obtain FAA approval indicating that the project structures would be safe (Appendix I). The proposed project would not create additional open space and would be not expected to cause an increase in the attraction of birds or other wildlife.</p>

Table 3.10-1. Project Consistency with Land Use Guidance Documents

Goal, Policy, Objective	Proposed Project Consistency
<ul style="list-style-type: none"> Any project having the potential to create electrical or visual hazards to aircraft in flight, including: electrical interference with radio communications or navigational signals; lighting which could be mistaken for airport lighting; glare or bright lights (including laser lights) in the eyes of pilots of aircraft using the Airport; certain colors of neon lights—especially red and white—that can interfere with night vision goggles used by military pilots; and impaired visibility near the Airport. The local agency should coordinate with the Marine Corps in making this determination. (iv) Any project having the potential to cause an increase in the attraction of birds or other wildlife that can be hazardous to aircraft operations in the vicinity of the Airport. The local agency should coordinate with the airport proprietor in making this determination. 	
<p>Overflight Notification: In addition to the Real Estate Disclosure documents required by State law (see Policy 3.7.2), an Overflight Notification document shall be recorded for any local agency approval of residential land use development within the area indicated on Map MIR-4, Compatibility Policy Map: Overflight.</p> <ul style="list-style-type: none"> The Overflight Notification document shall contain the language indicated in Appendix F. Recordation of an Overflight Notification document is not required for nonresidential development. Nothing in this policy is intended to prevent a local land use jurisdiction from adopting and implementing an expanded form of the overflight notification area or Overflight Notification document. 	<p>Consistent. The project site would be within the Overflight Notification Area. As such, the applicant would disclose the appropriate overflight notification to the City of Santee.</p>

Impact Determination

Based on the information provided in Table 3.10-1, the proposed project would be consistent with the applicable land use plans and policies adopted for the purposes of mitigating or avoiding an environmental impact, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.10.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would implementation of the proposed project contribute to a significant cumulative impact related to physically dividing an established community?

The geographic context for the land use cumulative impact analysis includes the Cities of San Diego and Santee. The cumulative projects identified in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, would include the construction of new roads or other features that could have the potential to divide an established community. However, because all cumulative projects would be required to demonstrate consistency with the City of Santee General Plan and undergo development review prior to approval, it is not expected that these projects would physically divide an established community. As discussed under *Threshold 1*, above, implementation of the proposed project would not physically divide an established community. Therefore, the proposed project's contribution would not be cumulatively considerable. Cumulative impacts would be less than significant.

Cumulative Threshold 2: Would implementation of the proposed project cause a significant cumulative 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 geographic context for the land use cumulative impact analysis includes the Cities of San Diego and Santee. As demonstrated in Table 3.10-1, the proposed project would be consistent with the City of Santee's *General Plan*, the City of San Diego's *General Plan*, and other relevant policies of local land use plans. Furthermore, the cumulative projects identified in Table 3-2 would be consistent with the existing adopted plans, or require mitigation measures or design review to ensure consistency, in order for project approvals to occur. Regardless, land use factors associated with the development of the project site as proposed would not affect or be affected by approvals of reasonably expected future development elsewhere in the City of Santee, City of San Diego, or in other jurisdictions. Therefore, the proposed project, along with the identified cumulative projects, would not result in a cumulative land use impact, and the proposed project's contribution would not be cumulatively considerable.

3.10.7 Summary of Significant Impacts

There would be no significant impacts associated with land use and planning.

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3.11 Mineral Resources

3.11.1 Overview

This section describes the existing conditions and applicable laws and regulations for mineral resources within the Carlton Oaks Country Club and Resort Project (project) site. This section also provides an analysis of the proposed project's potential to result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state.

3.11.2 Environmental Setting

Until the 1950s, the project site was undeveloped, vegetated land, with the San Diego River meandering through the center of the site in an east–west orientation. During the late 1950s, a golf course country club was developed. The golf course was generally flat, with two built water features present along the northeastern portion of the golf course, consistent with the current location of the northernmost water feature on the golf course. Buildings consistent with the existing club house, hotel, and maintenance building have been present on site since the early 1960s, and the villas along Carlton Oaks Boulevard were constructed throughout the 1960s and early 1970s. The southern water feature was developed in the 1980s. The golf course was redeveloped in approximately 1995 to the layout that currently exists on the project site. The project site is relatively flat to gently sloping terrain and currently consists of a 145-acre, 18-hole golf course and country club structures, including a 52-room motel-type hotel. Structures within the country club facility include administrative offices, a pro shop, a restaurant and bar, a swimming pool, a golf-cart barn, maintenance facilities, and an asphalt-paved parking lot.

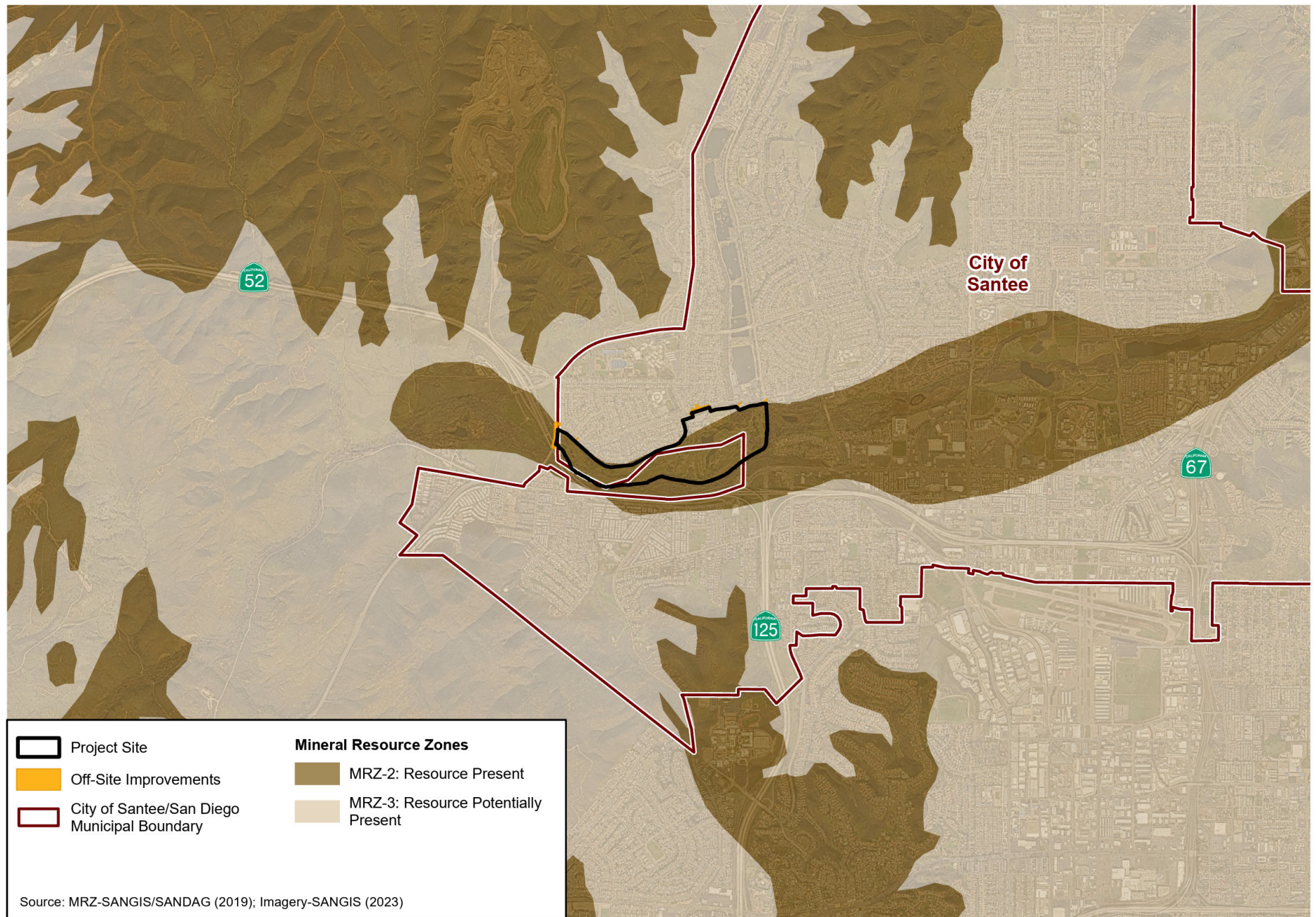
The land surrounding the project site was graded or undeveloped land until the early 1960s, when residential development was constructed adjacent to the northeastern boundary of the project site and to the southeast of the project site. The existing residential neighborhoods north of the central and western portions of the project site were constructed in the 1970s. In the mid- to late 1990s, I- 52, located south of the project site, was developed into what it resembles today.

According to the City of Santee's *General Plan* (City of Santee 2003), Santee includes a number of areas containing valuable mineral (primarily sand and gravel) resources. These include areas along the San Diego River, which includes the project site. The crushed sand, gravel, and stone, referred to as *aggregate*, yield construction materials such as Portland Cement Concrete, Asphaltic Concrete (commonly called *black top*), plaster, and stucco. Aggregate is also used as street base, subbase, railroad ballast, and fill. Three mining operations have been located in the City of Santee, and several have been located in the areas surrounding the project site (USGS 2024). These mines primarily harvested granite, sand, and gravel, but many of them are no longer operational. No active mining operations currently exist within the project site.

As mandated by the Surface Mining and Reclamation Act (SMARA) of 1975 (California PRC Sections 2710–2796), the California State Mining and Geology Board classifies California mineral resources with the Mineral Resource Zones (MRZs) system. These zones have been established based on the presence or absence of significant sand and gravel deposits and crushed rock source (e.g., products used in the production of cement). Within the City of Santee, valuable sand, gravel, and crushed rock resources exist, which are important to the construction industry. The City of Santee's *General Plan* has designated the City of Santee into two zones: MRZ-2 and MRZ-3 (City of Santee 2003). MRZ-2 defines areas where adequate information exists to indicate that significant mineral deposits are present or where it was judged that a high likelihood for their presence exists.

MRZ-3 areas are those containing mineral deposits whose significance cannot be evaluated from available data. This classification also includes areas where both acceptable- and unacceptable-quality materials are intermixed.

Because of the project site's location along the San Diego River, it lies mostly within MRZ-2 (as shown on Figure 3.11-1, Mineral Resource Zones). The only exception is the small portion of the Residential North development area, which lies within MRZ-3.



DUDEK



0 1,500 3,000
1:80,000 Feet

Figure 3.11-1
Mineral Resource Zones

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3.11.3 Applicable Laws and Regulations

3.11.3.1 State

Surface Mining and Reclamation Act of 1975

As mandated by SMARA, the California State Mining and Geology Board classifies the state's mineral resources with the MRZ system, which includes identification of presence/absence conditions for meaningful sand and gravel deposits. The classification system emphasizes Portland Cement Concrete aggregates, which are used in manufacturing strong, durable concrete and have stricter specifications than other aggregate materials.

Mineral land classification for the region is designated as follows (PRC Sections 2710–2796):

- **MRZ-1:** Areas where adequate information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence
- **MRZ-2:** Areas where adequate information indicates that significant mineral deposits are present or where it is judged that there is a high likelihood for their presence
- **MRZ-3:** Areas containing mineral deposits, the significance of which cannot be evaluated from available data
- **MRZ-4:** Areas where available information is inadequate for assignment to any other MRZ

Additionally, SMARA Sections 2762 and 2763 require that jurisdictions issue a Statement of Reasons for projects that include the elimination of the potential for extraction in areas of regionally significant mineral resources. SMARA requires that decision makers consider this elimination of extraction potential in their decision on land use. The Statement of Reasons lists potential reasons to approve a proposed project and to include elimination of the potential for extraction of the resources; decision makers may adopt or modify any of these. The Statement of Reasons must be submitted to the State Geologist and California State Mining and Geology Board for their review for a period of 60 days in conjunction with the environmental review of a qualifying proposed project.

3.11.3.2 Local

City of Santee General Plan

Divided into nine elements, the City of Santee's *General Plan* is a statement of intent as to the future development of the community (City of Santee 2003). This is accomplished through objectives and policies that serve as long-term policy guides for physical, economic, and environmental growth.

The purpose of the of the City of Santee's *General Plan – Conservation Element* (City of Santee 2003) is to identify the community's natural and artificial resources and encourage their wise management to assure their continued availability for use, appreciation, and enjoyment. The Conservation Element identifies areas in the City of Santee that contain valuable mineral resources, primarily sand and gravel, and notes the potential environmental and flooding problems associated with mining operations. The applicable Conservation Element objectives and policies are detailed below (City of Santee 2003):

Objective 5.0: Conduct extraction of mineral deposits with a minimum amount of disturbance to adjacent properties.

Policy 5.1: The City shall require that all proposed mining operations are adequately reviewed during the project and environmental review processes to minimize to the greatest degree possible, all identified environmental impacts, especially water quality, habitat preservation and bridge undermining.

Objective 6.0: Reclaim all mined lands to usable conditions that are adaptable for alternative land uses.

Policy 6.1: The City shall require the planned reclamation of mined lands following extraction of mineral resources with consideration of the land's potential for recreational, wildlife habitat, and scenic uses as well as for residential, industrial or commercial development.

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.

San Diego General Plan

The City of San Diego's *General Plan* (City of San Diego 2008) includes a number of policies designed to preserve access to mineral resources, reducing the need for new construction materials, and to accommodate mineral extraction to occur under less objectionable circumstances. These policies are provided below:

1. Promote the recycling and reclamation of construction materials to provide for the City's current and future growth and development needs.
2. Permit new or expanding mining operations within the MHPA [Multi-Habitat Planning Area] in accordance with MSCP [Multiple Species Conservation Program] policies and guidelines.
3. Produce sand and gravel with minimal harm and disturbance to adjacent property and communities.
4. Plan rehabilitation of depleted mineral areas to facilitate reuse consistent with state requirements, the Surface Mining and Reclamation Act (SMARA), and local planning goals and policies, including the MSCP.
5. Consider local evaporative salt production for future economic value, open space use, and for important ecological habitat.

The General Plan Environmental Impact Report states the following (City of San Diego 2007):

The use of locally mined materials for San Diego's development is desirable as it reduces the need for trucking materials over long distances. This, in turn, results in decreased energy use, and reduced traffic, infrastructure, and air quality impacts, as well as lower direct costs to the consumer and local government. Local use may also result in fewer direct mining environmental impacts to remote, less regulated areas outside the City. Reclamation and recycling of building materials must take on a greater importance in order to continue meeting local needs. Recycling has the added benefit of reducing the amount of waste entering landfills.

Although the Draft General Plan proposes several policies aimed at protecting mineral resources, the potential future land development consistent with the General Plan could still affect these resources. Determinations of land use compatibility between a future project and significant mineral resources and the conflicts of mining within the MSCP preserve would be addressed through the entitlement process. Conflicting goals and policies

between habitat and open space preservation and mineral extraction may lead to the loss of access to significant mineral resources, which could result in impacts.

3.11.4 Project Impact Analysis

3.11.4.1 Methodology

The analysis of mineral resources is based on a review of the MRZ potential for the project site, which was evaluated by reviewing mineral land classification maps that the California Department of Conservation's Division of Mine Reclamation compiled (CDMG 1996). The on-site MRZs are depicted on Figure 3.11-1.

3.11.4.2 Thresholds of Significance

The following significance criteria are based on State California Environmental Quality Act (CEQA) Guidelines Appendix G and provide the basis for determining significance of impacts associated with mineral resources resulting from the implementation of the proposed project.

Impacts are considered significant if the proposed project would result in any of the following:

1. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state.
2. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

The analysis of whether the proposed project would have a significant impact related to Threshold 2 is provided in Chapter 4, Other CEQA Considerations, which determined that the proposed project would result in no impact. Therefore, only Threshold 1 is discussed in the impact analysis that follows.

3.11.5 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

Impact Discussion

Construction of the proposed project has the potential to affect the mineral resources of both known and unknown significance in MRZ-2 and MRZ-3 on the project site (Figure 3.11-1). The Residential West and resort facility portions of the proposed project would have the potential to affect MRZ-2. Residential North would affect MRZ-2, as well; however, a small portion of Residential North lies within MRZ-3. The remainder of the project site that is within the City of Santee would be undeveloped and also lies within MRZ-2. The golf course, which is within the jurisdiction of the City of San Diego, is also within MRZ-2.

The majority of the project site is underlain with two major rock types: (1) young alluvium, composed of loose to medium-dense, silty, fine to coarse sands; and (2) older alluvium, consisting primarily of dense to very dense, clayey/silty sands, gravels, and cobbles. Beneath the alluvium layers lies the Friars Formation, a Middle Eocene-age formation that varies from 10 feet to 30 feet below the existing ground surface. This formation, where

encountered, consists of very stiff to hard, pale-green, sandy siltstone and dense, silty-fine sandstone. All three of these rock formations are commonly mined elsewhere in San Diego County and California for use as aggregate and are considered valuable to the region and the state.

As discussed in Section 3.3, Biological Resources, the southern portion of the project site, as well as adjacent lands to the south, include areas that are within the City of San Diego's MHPA. This area contains the streambed for Sycamore Creek and the San Diego River, riparian vegetation, waters of the United States and state, and City of San Diego Environmentally Sensitive Lands Wetlands, as well as several sensitive plant and wildlife species. In addition, fully conserved existing Conservation Lands are immediately adjacent to the southeast of the project site. The City of Santee's *General Plan – Conservation Element's* Objective 5.0 and Policy 5.1, as well as the project site's proximity to the aforementioned conservation area and biologically sensitive lands, would likely preclude the proposed project from eligibility for mineral extraction because of the potential habitat and water quality impacts on these riparian and preserve areas.

Although there is the potential of mineral recovery from the MRZ-2 and MRZ-3 areas on the project site, in accordance with the City of Santee's *General Plan – Conservation Element*, economic, land use compatibility, and environmental protection factors must be considered when deciding on the appropriateness of mining in a particular area. In addition, the City of Santee's *General Plan* designates the project site for Planned Development, not mineral resources extraction. Furthermore, consistent with the City of Santee's *General Plan – Conservation Element's* Objective 10.0, approximately 61.5% of the project site would remain undeveloped as open space and golf course uses, and the mineral resources, like aggregate and sediment, in the open space would not be lost to the region.

With respect to the portion of the project under the jurisdiction of the City of San Diego, the golf course would remain as open space and golf course uses. Therefore, even though adjacency and environmental factors must be considered (similar to Santee's), this portion of the project site would remain undeveloped, and the mineral resources would not be lost to the region.

Therefore, the proposed project would result in a less-than-significant impact associated with the loss of mineral resources that would be of value to the region and the state.

Impact Determination

Implementation of the proposed project would not result in a significant impact.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.11.6 Cumulative Impacts and Mitigation Measures

The geographic context for the analysis of cumulative impacts related to the potential loss of known mineral resources encompasses the entire City of Santee. As described in Section 3.11.3, Applicable Laws and Regulations, the state uses the MRZ system to identify presence/absence conditions for meaningful sand and

gravel deposits. For cumulative projects that include lands designated as MRZ areas and that have the potential to affect mineral resources, consideration of economic, land use compatibility, and environmental protection factors would be considered when deciding on the appropriateness of mining in those particular areas. Cumulative projects (Table 3-2 in Chapter 3, Environmental Analysis) identified in the City of Santee include the construction of residential, mixed-use, and civic properties that could contribute to the loss of availability of known mineral resources.

Cumulative Threshold 1: Would implementation of the proposed project result in a significant cumulative impact related to the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

As discussed in Section 3.11.2, Environmental Setting, the project site lies mostly within MRZ-2 due to its location along the San Diego River, which has historically been one of the primary sources of construction aggregate for the San Diego region. As detailed in the City of Santee's *General Plan*, three mining operations have been located within the City of Santee east of Magnolia Avenue in the past, and several have been located in the areas surrounding the project site. These mines primarily harvested granite, sand, and gravel, and they are no longer operational.

The nearest active sand, gravel, and rock mining operation lies to the north and east but is outside the City of Santee's jurisdiction. This operation, known as Slaughterhouse Canyon, is within the County of San Diego's jurisdiction. Other areas where the cumulative projects are located in the City of Santee are planned for residential, commercial, and municipal development and, therefore, would not be available for mineral extraction. Cumulative projects would not contribute to the loss of availability of mineral resources. Thus, a significant cumulative impact associated with the loss of availability of known mineral resources would not occur. The proposed project's contribution would not be cumulatively considerable.

3.11.7 Summary of Significant Impacts

There would be no significant impacts associated with mineral resources.

3.11.8 References

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3.12 Noise and Vibration

3.12.1 Overview

This section addresses the potential noise and vibration impacts of the proposed Carlton Oaks Country Club and Resort Project (project). Included is a discussion of the existing conditions, applicable laws, and regulations governing project-related noise and vibration, and any noise and vibration impacts in the project vicinity during construction and operation.

This section focuses on potential impacts on surrounding people and properties; potential effects on wildlife are addressed in Section 3.3, Biological Resources, of this Environmental Impact Report (EIR). Information in this section is based on the *Carlton Oaks Country Club and Resort Noise Assessment* completed by Ldn Consulting Inc., dated May 2025 (Appendix B2).

3.12.2 Noise Fundamentals

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. *Noise* is often defined as sound that is objectionable because it is unwanted, disturbing, or annoying.

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receptor, and the propagation path between the two. The loudness of the noise source and the obstructions or atmospheric factors, which affect the propagation path to the receptor, determine the sound level and the characteristics of the noise perceived by the receptor.

The following sections provide an explanation of key concepts and acoustical terms used in the analysis of environmental and community noise.

3.12.2.1 Decibels and Frequency

Continuous sound can be described by its *frequency* (i.e., pitch) and *amplitude* (i.e., loudness). A low-frequency sound is perceived as low in pitch; a high-frequency sound is perceived as high-pitched. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

The amplitude of pressure waves generated by a sound source correlates with the loudness of that source. The amplitude of a sound is typically described in terms of *sound pressure level*, also referred to simply as the *sound level*. Sound pressure level refers to the root-mean-square (rms)¹ pressure of a sound wave and is measured in units called microPascals (μPa). One μPa is approximately one hundred-billionth (0.0000000001) of normal atmospheric pressure. Sound pressure amplitudes for different kinds of noise environments can range from less than 100 to more than 100,000,000 μPa. Because of this large range of values, sound is rarely expressed in terms of μPa. Instead, a logarithmic scale is used to describe the sound pressure level in terms of decibels (dB). The

¹ *Root-mean-square* (rms) is defined as the square root of the mean (i.e., average) value of the squared amplitude of the noise signal.

decibel is a logarithmic unit that describes the ratio of the actual sound pressure to a reference pressure (i.e., 20 μPa is the standard reference pressure level for acoustical measurements in air). Specifically, a sound pressure level, in decibels, is calculated as follows:

$$SPL = 20 \times \log_{10} \left(\frac{X}{20 \mu\text{Pa}} \right)$$

where X is the actual sound pressure and 20 μPa is the reference pressure. The threshold of hearing for young people is approximately 0 dB, which corresponds to 20 μPa .

3.12.2.2 Decibel Calculations

Because decibels represent noise levels using a logarithmic scale, sound pressure levels cannot be added, subtracted, or averaged through ordinary arithmetic. On the dB scale, a doubling of sound energy corresponds to a 3 dB increase. In other words, when two identical sources are each producing sound of the same loudness, their combined sound level at a given distance would be 3 dB higher than one source under the same conditions. For example, if one bulldozer produces a sound pressure level of 80 dB, two bulldozers would not produce a combined sound level of 160 dB. Rather, they would combine to produce 83 dB. The cumulative sound level of any number of sources, such as excavators, can be determined using decibel addition. The same decibel addition is used for A-weighted decibels (dBA) described below.

Similarly, the arithmetic mean (i.e., average) of a series of noise levels does not accurately represent the overall average noise level. Instead, the values must be averaged using a linear scale before converting the result back into a logarithmic (i.e., dB) noise level. This method is typically referred to as calculating the “energy average” of the noise levels.

3.12.2.3 A-Weighting

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness or human response is determined by characteristics of the human ear.

Human hearing is limited in the range of audible frequencies, as well as in the way it perceives the sound pressure level in that range. In general, people are most sensitive to the frequency range of 1,000 to 8,000 Hz and perceive sounds within that range better than sounds of the same amplitude at higher or lower frequencies. To approximate the response of the human ear, sound levels of individual frequency bands are weighted (i.e., adjusted), depending on human sensitivity to those frequencies. The resulting sound pressure level is expressed in dBAs.

The A-weighting scale approximates the frequency response of the average young ear when listening to most ordinary sounds. When people make judgments regarding the relative loudness or annoyance of a sound, their judgments correlate well with the A-weighted sound levels of those sounds. Table 3.12-1 describes typical A-weighted sound levels for various noise sources.

Table 3.12-1. Typical A-Weighted Sound Levels

Common Outdoor Noise Source	Sound Level (dBA)	Common Indoor Noise Source
	– 110 –	Rock band
Jet flying at 1,000 feet		
	– 100 –	
Gas lawn mower at 3 feet		
	– 90 –	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	– 80 –	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawn mower at 100 feet	– 70 –	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	– 60 –	
		Large business office
Quiet urban daytime	– 50 –	Dishwasher in next room
Quiet urban nighttime	– 40 –	Theater, large conference room (background)
Quiet suburban nighttime		
	– 30 –	Library
Quiet rural nighttime		Bedroom at night
	– 20 –	
		Broadcast/recording studio
	– 10 –	
Lowest threshold of human hearing	– 0 –	Lowest threshold of human hearing

Source: Caltrans 2013.

Note: dBA = A-weighted decibels.

3.12.2.4 Noise Descriptors

Because sound levels can vary markedly over a short period of time, various descriptors, or noise “metrics,” have been developed to quantify environmental and community noise. These metrics generally describe either the average character of the noise or the statistical behavior of the variations in the noise level. Some of the most common metrics used to describe environmental noise, including those metrics used in this analysis, are described below:

- **Equivalent Sound Level (L_{eq})** is the most common metric used to describe short-term average noise levels. Many noise sources produce levels that fluctuate over time; examples include mechanical equipment that cycles on and off or construction work, which can vary sporadically. The L_{eq} describes the average acoustical energy content of noise for an identified period of time, commonly 1 hour. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustical energy over the duration of the exposure. For many noise sources, the L_{eq} will vary, depending on the time of day. A prime example is traffic noise, which rises and falls, depending on the amount of traffic on a given street or freeway. The hourly L_{eq} used in the analysis is denoted as $L_{eq(h)}$; the 8-hour L_{eq} used in the analysis is denoted as $L_{eq(8h)}$.

- **Maximum Sound Level (L_{max}) and Minimum Sound Level (L_{min})** refer to the maximum and minimum sound levels, respectively, that occur during the noise-measurement period. More specifically, they describe the rms sound levels that correspond to the loudest and quietest 1-second intervals that occur during the measurement.
- **Percentile-Exceeded Sound Level (L_{xx})** describes the sound level exceeded for a given percentage of a specified period. For example, the L_{50} is the sound level exceeded 50% of the time (such as 30 minutes per hour), and L_{25} is the sound level exceeded 25% of the time (such as 15 minutes per hour).
- **Community Noise Equivalent Level (CNEL)** is a measure of the 24-hour average dBA level that is also time-weighted to “penalize” noise that occurs during the evening and nighttime hours, when noise is generally recognized to be more disturbing (i.e., because people are trying to rest, relax, and sleep during these times). During the evening hours of 7 p.m. to 10 p.m., 5 dBA is added to the L_{eq} ; 10 dBA is added to the L_{eq} during the nighttime hours of 10 p.m. to 7 a.m., and the energy average is then taken for the whole 24-hour day.
- **Day-Night Sound Level (L_{dn})** is very similar to the CNEL described above. L_{dn} is also a time-weighted average of the 24-hour dBA level; the only difference is that no “penalty” is applied to the evening hours of 7 p.m. to 10 p.m. During the nighttime hours of 10 p.m. to 7 a.m., 10 dBA is added to the L_{eq} , and the energy average is then taken for the whole 24-hour day.

It is noted that various federal, state, and local agencies have adopted CNEL or L_{dn} as the measure of community noise. Although not identical, CNEL and L_{dn} are normally within 1 dBA of each other when measured in typical community environments, and many noise standards/regulations use the two interchangeably.

3.12.2.5 Human Response to Noise

Noise can have a range of effects on people, including hearing damage, sleep interference, speech interference, performance interference, physiological responses, and annoyance. Each of these is briefly described below:

- **Hearing Damage.** A person exposed to high noise levels can suffer hearing damage, either gradual or traumatic. *Gradual hearing loss* occurs with repeated exposure to excessive noise levels and is most commonly associated with occupational noise exposures in heavy industry or other very noisy work environments. *Traumatic hearing loss* is caused by sudden exposure to an extremely high noise level, such as a gunshot or explosion at very close range. The potential for noise-induced hearing loss is not generally a concern in typical community noise environments. Noise levels in neighborhoods, even in very noisy airport environs, are not sufficiently loud as to cause hearing loss.
- **Sleep Interference.** Exposure to excessive noise levels at night has been shown to cause *sleep disturbance*, which refers not only to awakening from sleep, but also to effects on the quality of sleep, such as altering the pattern and stages of sleep. Interior noise levels between 50 and 55 dBA L_{max} during nighttime hours (10 p.m. to 7 a.m.) were found to result in sleep disturbance and annoyance (Nelson 1987).
- **Speech Interference.** Speech interference can be a problem in any situation where clear communication is desired, but is often of particular concern in learning environments (e.g., schools) or situations where poor communication could jeopardize safety. Normal conversational speech is in the range of 60 to 65 dBA, and any noise in this range or louder may interfere with speech. As background noise levels rise, the intelligibility of speech decreases, and the listener will fail to recognize an increasing percentage of the words spoken. A speaker may raise their voice in an attempt to compensate for higher background noise levels, but this in turn can lead to vocal fatigue for the speaker.

- **Performance Interference.** Excessive noise has been found to have various detrimental effects on human performance, including information processing, concentration, accuracy, reaction times, and academic performance. Intrusive noise from individual events can also cause distraction. These effects are of obvious concern for learning and work environments.
- **Physiological Responses.** Noise has been shown to cause measurable physiological responses in humans, including changes in stress-hormone levels, pulse rate, and blood pressure. The extent to which these responses cause harm or signs of harm is not clearly defined, but they could contribute to stress-related diseases, such as hypertension, anxiety, and heart disease.
- **Annoyance.** The subjective effects of annoyance, nuisance, and dissatisfaction are possibly the most difficult to quantify, and no completely satisfactory method exists to measure these effects. This difficulty arises primarily from differences in individual sensitivity and habituation to sound, which can vary widely from person to person. What one person considers tolerable can be quite unbearable to another of equal hearing acuity. An important tool in estimating the likelihood of annoyance due to a new sound is by comparing it to the existing baseline, or *ambient*, environment to which that person has adapted. In general, the more the level or tonal (i.e., frequency) variations of a sound exceed the previously existing ambient sound level or tonal quality, the less acceptable the new sound will be.

In most cases, effects from sounds typically found in the natural environment would be limited to annoyance or interference. Physiological effects and hearing loss would be more commonly associated with human-caused noise, such as in an industrial or an occupational setting.

Studies have shown that, under controlled conditions in an acoustics laboratory, a healthy human ear is able to discern changes in sound levels of 1 dBA. In the normal environment, the healthy human ear can detect changes of approximately 2 dBA; however, it is widely accepted that a doubling of sound energy, which results in a change of 3 dBA in the normal environment, is considered just noticeable to most people. A change of 5 dBA is readily perceptible, and a change of 10 dBA is perceived as being twice as loud. Accordingly, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) resulting in a 3 dBA increase in sound would generally be barely detectable.

3.12.2.6 Sound Propagation

When sound propagates over a distance, it changes in both level and frequency content. The manner in which noise is reduced with distance depends on the following important factors:

- **Geometric Spreading.** Sound from a single source (i.e., a *point* source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dB for each doubling of distance. Highway noise does not constitute a single stationary point source of sound. The movement of vehicles on a highway makes the source of the sound appear to emanate from a line (i.e., a *line* source) rather than from a point. This results in cylindrical spreading rather than the spherical spreading resulting from a point source. The change in sound level (i.e., attenuation or decrease) from a line source is 3 dB per doubling of distance.
- **Ground Absorption.** Usually, the noise path between the source and the observer is very close to the ground. The excess noise attenuation from ground absorption occurs because of acoustic energy losses on sound-wave reflection. For acoustically absorptive, or “soft,” sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the geometric spreading, the excess ground

attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance for a line source and 7.5 dB per doubling of distance for a point source.

- **Atmospheric Effects.** Research by the California Department of Transportation (Caltrans) (Caltrans 2013) and others has shown that atmospheric conditions can have a major effect on noise levels. Factors include wind, air temperature (including vertical temperature gradients), humidity, and turbulence. Receptors downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas receptors upwind can have lower noise levels. Increased sound levels can also occur over relatively large distances because of temperature inversion conditions (i.e., increasing air temperature with elevation).
- **Shielding by Natural or Constructed Features.** A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receptor, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (e.g., hills and dense woods) and constructed features (e.g., buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor with the specific purpose of reducing noise. A barrier that breaks the line-of-sight between a source and a receptor will typically result in at least 5 dB of noise reduction. A higher barrier may provide as much as 20 dB of noise reduction.

3.12.2.7 Noise-Sensitive Land Uses

Noise-sensitive land uses are the locations most likely to be adversely affected by excessive noise levels. The City of Santee's *General Plan – Noise Element* (City of Santee 2003) identifies the following land uses as noise sensitive: residences, schools, parks, hospitals, libraries, rest homes, and long-term medical- or mental-care facilities.

3.12.3 Environmental Vibration Fundamentals

Groundborne vibration is a small, rapidly fluctuating motion transmitted through the ground. The effects of groundborne vibrations are typically limited to causing nuisance or annoyance to people, but at extreme vibrational levels damage to buildings may also occur.

In contrast to airborne sound, groundborne vibration is not a phenomenon that most people experience every day. The ambient groundborne vibrational level in residential areas is usually much lower than the threshold of human perception. Most perceptible indoor vibration is caused by sources within buildings, such as mechanical equipment while in operation, people moving, or doors slamming. Typical outdoor sources of perceptible groundborne vibration are heavy construction activity (e.g., blasting, pile-driving, earthmoving), steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, then the groundborne vibration from traffic is rarely perceptible, even in locations close to major roads. The strength of groundborne vibration from typical environmental sources diminishes (or attenuates) fairly rapidly over distance.

For the prediction of groundborne vibration, the fundamental model consists of a vibration source, a receptor, and the propagation path between the two. The power of the vibration source and the characteristics and geology of the intervening ground, which affect the propagation path to the receptor, determine the groundborne vibrational level and the characteristics of the vibration perceived by the receptor.

The following sections provide an explanation of key concepts and terms used in the analysis of environmental groundborne vibration.

3.12.3.1 Displacement, Velocity, and Acceleration

Vibration sources (e.g., blasting, dynamic construction equipment, train) impart energy to the ground, creating vibration waves that propagate away from the source, along the surface, and downward into the earth. As vibration waves travel outward from a source, they excite the particles of rock and soil through which they pass and cause them to oscillate. The distance that these particles move is referred to as the *displacement* and is typically very small, usually only a few ten-thousandths to a few thousandths of an inch. *Velocity* describes the instantaneous speed of the motion, and *acceleration* is the instantaneous rate of change of the speed. Each of these measures can be further described in terms of *frequency* and *amplitude*, as discussed below.

Although displacement is generally easier to understand than velocity or acceleration, it is rarely used to describe groundborne vibration because most transducers used to measure vibration directly measure velocity or acceleration, not displacement.

3.12.3.2 Frequency and Amplitude

The *frequency* of a vibrating object describes how rapidly it is oscillating. The unit of measurement for frequency of vibration is Hz (the same as used in the measurement of noise), which describes the number of cycles per second.

The amplitude of displacement describes the distance that a particle moves from its resting (or *equilibrium*) position as it oscillates and can be measured in inches. The amplitude of vibrational velocity (i.e., the speed of the movement) can be measured in inches per second (in/sec). The amplitude of vibrational acceleration (i.e., the rate of change of the speed) can be measured in inches per second squared (in/sec²).

3.12.3.3 Vibration Descriptors

As noted above, groundborne vibration can be quantified in various ways based on its fundamental characteristics. Because vibration can vary markedly over a short period of time, various descriptors have been developed to quantify vibration. The descriptor used in this analysis is *peak particle velocity* (PPV), defined as the maximum instantaneous positive or negative peak amplitude of the vibrational velocity. The unit of measurement for PPV is in/sec. Unlike many quantities used in the study of environmental acoustics, PPV is typically presented using linear values and does not employ a dB scale. Because it is related to the stresses that are experienced by buildings, PPV is generally accepted as the most appropriate descriptor for evaluating the potential for building damage (both Federal Transit Administration and Caltrans guidelines recommend using PPV for this purpose). It is also used in many instances to evaluate the human response to groundborne vibration (Caltrans guidelines recommend using PPV for this purpose).

3.12.3.4 Vibration Propagation

Vibrational energy spreads out as it travels through the ground, causing the vibrational level to diminish with distance away from the source. High-frequency vibrations reduce much more rapidly than low frequencies, so that low frequencies tend to dominate the spectrum at large distances from the source. The propagation of groundborne vibration is not as simple to model as airborne noise because noise in the air travels through a relatively uniform medium, whereas groundborne vibrations travel through the earth, which may contain significant geological differences. Geological factors that influence the propagation of groundborne vibration include the following:

- **Soil Conditions.** The type of soil is known to have a strong influence on the levels of groundborne vibration. Among the most important factors are the stiffness and internal damping of the soil. Hard, dense, and

compacted soil, stiff clay soil, and hard rock transmit vibration more efficiently than loose, soft soils, sand, or gravel.

- **Depth to Bedrock.** Shallow depth to bedrock has been linked to efficient propagation of groundborne vibration. One possibility is that shallow bedrock acts to concentrate the vibrational energy near the surface, reflecting vibration waves back toward the surface that would otherwise continue to propagate farther down into the earth.
- **Soil Strata.** Discontinuities in the soil strata (i.e., soil layering) can also cause diffractions or channeling effects that affect the propagation of vibration over long distances.
- **Frost Conditions.** Vibration waves typically propagate more efficiently in frozen soils than in unfrozen soils. Propagation also varies depending on the depth of the frost.
- **Water Conditions.** The amount of water in the soil can affect vibration propagation. The depth of the water table in the path of the propagation also appears to have substantial effects on groundborne vibrational levels.

Specific conditions at the source and receiver locations can also affect the vibrational levels. For example, how the source is connected to the ground (e.g., direct contact, through rails, or via a structure) would affect the amount of energy transmitted into the ground. There are also notable differences when the source is underground (such as in a tunnel) versus on the surface. At the receiver, vibrational levels can be affected by variables such as the foundation type, the building construction, and the acoustical absorption inside the rooms where people are located. When vibration encounters a building, a ground-to-foundation coupling loss would usually reduce the overall vibrational level. However, under certain circumstances, the ground-to-foundation coupling may also amplify the vibrational level due to structural resonances of the floors and walls.

3.12.3.5 Effects of Groundborne Vibration

Vibration can result in effects that range from annoyance to structural damage. Annoyance or disturbance of people may occur at vibrational levels substantially below those that would pose a risk of damage to buildings. Each of these effects is discussed below.

Potential Building Damage

When groundborne vibration encounters a building, vibrational energy is transmitted to the structure causing it to vibrate and, if the vibrational levels are high enough, damage to the building may occur. Depending on the type of building and the vibrational levels, this damage could range from cosmetic architectural damage (e.g., cracked plaster, stucco, tile) to more severe structural damage (e.g., cracking of floor slabs, foundations, columns, beams, wells). Buildings can typically withstand higher levels of vibration from transient sources than from continuous or frequent intermittent sources. *Transient sources* are those that create a single isolated vibration event, such as blasting or drop balls. *Continuous/frequent intermittent sources* include impact and vibratory pile drivers, pogo-stick compactors, crack-and-seat equipment, and vibratory-compaction equipment. Older, fragile buildings (which may include important historical buildings) are of particular concern. Modern commercial and industrial buildings can generally withstand much higher vibrational levels before potential damage becomes a problem.

Human Disturbance or Annoyance

Groundborne vibration can be annoying to people and can cause serious concern for nearby neighbors of vibrational sources, even when vibration is well below levels that could cause physical damage to structures. Groundborne

vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernible, but there is less adverse reaction without the effects associated with the shaking of a building. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than 1 Hz to a high of approximately 200 Hz.

When groundborne vibration waves encounter a building, vibrational energy is transmitted to the building foundation, and then propagates throughout the remainder of the structure, causing building surfaces (i.e., walls, floors, and ceilings) to vibrate. This movement may be felt directly by building occupants and may also generate a low-frequency rumbling noise as sound waves are radiated by the vibrating surfaces. At higher frequencies, building vibration can cause other audible effects, such as rattling of windows, building fixtures, or items on shelves or hanging on walls. These audible effects due to groundborne vibration are referred to as *groundborne noise*. Groundborne vibrational levels that result in groundborne noise are often experienced as a combination of perceptible vibration and low-frequency noise. However, sources that have the potential to generate groundborne noise are likely to produce airborne noise impacts that mask the radiated groundborne noise. Any perceptible effect (i.e., vibration or groundborne noise) can lead to annoyance. The degree to which a person is annoyed depends on the activity in which they are participating at the time of the disturbance. For example, someone sleeping or reading will be more sensitive than someone who is engaged in any type of physical activity. Reoccurring vibrational effects often lead people to believe that the vibration is damaging their home, although vibrational levels are well below minimum thresholds for damage potential (Caltrans 2020).

Numerous studies have been conducted to characterize the human response to vibration and, over the years, numerous vibrational criteria and standards have been suggested by researchers, organizations, and governmental agencies. These studies suggest that the thresholds for perception and annoyance vary according to duration, frequency, and amplitude of vibration. For transient vibrational sources (i.e., single, isolated vibration events, such as blasting), the human response to vibration varies from barely perceptible at a PPV of 0.04 in/sec, to distinctly perceptible at a PPV of 0.25 in/sec, and severe at a PPV of 2.0 in/sec. For continuous or frequent intermittent vibrational sources (e.g., impact pile-driving or vibratory-compaction equipment), the human response to vibration varies from barely perceptible at a PPV of 0.01 in/sec, to distinctly perceptible at a PPV of 0.04 in/sec, and severe at a PPV of 0.4 in/sec (Caltrans 2020).

3.12.3.6 Vibration-Sensitive Land Uses

As discussed above, the potential effects of groundborne vibration can be divided into two categories: (1) building damage and (2) potential human annoyance. Because building damage would be considered a permanent negative effect at any building, regardless of land use, any type of building would typically be considered sensitive to this type of impact. Fragile structures, which often include historical buildings, are most susceptible to damage and are of particular concern.

Human annoyance effects from groundborne vibration are typically only considered inside occupied buildings and not at outside areas, such as residential yards, parks, or open space. Buildings that would be considered sensitive for human annoyance caused by vibration are generally the same as those that would be sensitive to noise and would include residences, schools, hospitals, libraries, rest homes, and long-term medical or mental-care facilities.

3.12.4 Environmental Setting

The existing noise environment in the noise study area is varied. Noise sources currently affecting the study area include traffic on State Route (SR-) 52, aircraft overflights from/to Gillespie Field, general neighborhood sources (e.g., air conditioners, landscaping activities), various ground-maintenance activities, and natural background noise (e.g., bird song, rustling leaves). Activities at the existing Carlton Oaks golf course and hotel also create noise, including golf tournaments and exterior activities at the pool and patio.

The closest noise-sensitive land uses to the project site are residences to the north adjacent to the property line, on Inverness Road, Carlton Oaks Drive, and Calle del Verde, and to the east, on Willowgrove Avenue and Gorge Avenue, at approximately 200 feet. All of the closest residents are in the City of Santee.

The nearest place of worship to the project site is the Carlton Hills Southern Baptist Church, approximately 740 feet to the east. Carlton Oaks School is the closest educational facility to the noise study area, at approximately 460 feet to the north. Both receptors are separated from the project site by intervening rows of residences (i.e., the homes discussed above). As a result, project-related noise levels at these locations would be substantially lower than at the closer homes.

To quantify the existing ambient noise conditions in the project vicinity, noise monitoring was conducted at six locations between January 22 and 25, 2025. Long-term noise monitoring was conducted at all six locations, with noise-minoring equipment logging hourly noise data for 72 hours. The six measurement sites, designated LT1, LT2, LT3, LT4, LT5, and LT6, are denoted on Figure 3.12-1. Measurements LT2, LT4, LT5, and LT6 were selected to represent the closest residential land uses to the project site. LT1 and LT3 were selected to document noise levels at undeveloped areas along the southern perimeter of the existing golf course. Long-term measurements were conducted using Type 2 sound level meters (SLMs).² All SLMs were field-calibrated prior to each measurement to ensure accuracy, using a Larson Davis CAL200 acoustical calibrator; the calibration was also rechecked at the conclusion of each measurement. The field survey results are provided in the *Carlton Oaks Country Club and Resort Noise Assessment* completed by Ldn Consulting Inc. in 2025 (Appendix M). The noise monitoring results are summarized in Table 3.12-2.

² Larson Davis Models Spark 703 and 706RC. Type 2 sound level meters are considered general-purpose grade for field use.

Table 3.12-2. Summary of Ambient Noise Monitoring Results

Site	Description	Dates	L _{dn} , dBA	L _{eq(h)} , dBA	L _{max}	L _{min}	L ₁₀	L ₅₀	L ₉₀
LT1	Southern treeline near the western end of the golf course	1/22/25–1/25/25	66.3	61.4	92.6	35.9	64.0	59.5	50.5
LT2	Northern edge of the golf course, near 8359 Carlton Oaks Drive	1/22/25–1/25/25	61.6	54.9	92.0	36.3	59.0	53.0	46.5
LT3	Southern treeline near the approximate center of the golf course	1/22/25–1/25/25	60.0	52.9	85.3	36.6	56.0	49.5	43.0
LT4	Near the golf course maintenance building, east of 9235 Inverness Road	1/22/25–1/25/25	62.5	55.5	84.8	37.4	59.0	53.0	44.5
LT5	Northeastern corner of golf course, south of 9047 Calle del Verde	1/22/25–1/25/25	56.1	50.6	90.6	34.7	54.0	46.0	39.5
LT6	Near treeline at the southeastern corner of the golf course, west of 8938 Willowgrove Avenue	1/22/25–1/25/25	58.6	52.5	84.1	40.3	55.5	49.0	44.0

Source: Appendix M.

Notes: Avg = average; dBA = A-weighted decibels; L_{dn} = Day-Night Sound Level; L_{eq(h)} = hourly equivalent sound level; the average acoustical energy content of noise during a 1-hour period; Max = maximum; Min = minimum.

Daytime = 7:00 a.m. to 10:00 p.m.; Nighttime = 10:00 p.m. to 7:00 a.m.

Figure 3.12-1 Measurement Sites



3.12.5 Applicable Laws and Regulations

3.12.5.1 Federal

Federal Transit Administration

The U.S. Department of Transportation Federal Transit Administration (FTA) provides criteria for acceptable levels of groundborne vibration for various types of special buildings that are sensitive to vibration. For purposes of identifying potential project-related vibration impacts, the FTA criteria will be used. The human reaction to various levels of vibration is highly subjective. The upper end of the range shown for the threshold of perception, or roughly 65 vibration velocity (VdB), may be considered annoying by some people. Vibration below 65 VdB may also cause secondary audible effects, such as a slight rattling of doors, suspended ceilings/fixtures, windows, and dishes, any of which may result in additional annoyance. Table 3.12-3 shows the FTA groundborne vibration and noise impact criteria for human annoyance.

In addition to the vibration annoyance standards presented above, the FTA also applies standards for construction vibration damage (Table 3.12-4). Structural damage is possible for typical residential construction when the PPV exceeds 0.2 in/sec. This criterion is the threshold at which there is a risk of damage to normal dwellings. In the context of this analysis, the noise and vibration impacts associated with the construction operations and any blasting operations will be conditioned to comply with the thresholds stated above. The potential noise and vibration impacts are analyzed separately below.

3.12.5.2 State

The state provides guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. The local government entities found within the project study area include the City of Santee and the City of San Diego. Summaries of the relevant content found in each jurisdiction's noise element are discussed below, in Section 3.12.5.3, Local.

California Department of Transportation

In its *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020), the California Department of Transportation (Caltrans) recommends 0.3 in/sec PPV as a threshold for the avoidance of structural damage for older 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 0.5 in/sec PPV (Caltrans 2020) at the same type of older residential structures.

With respect to human annoyance, Caltrans guidance indicates that building occupants would find vibration levels "distinctly perceptible" when exposed to continuous groundborne vibration above 0.04 in/sec PPV and transient levels above 0.25 in/sec PPV, or 80 and 96 VdB, respectively. Although both FTA and Caltrans thresholds are acceptable standards for vibration, FTA thresholds are more conservative and therefore have been used in this analysis.

Table 3.12-3. Groundborne Vibration and Noise Impact Criteria (Human Annoyance)

Categories	Groundborne Vibration Impact Levels (VdB re 1 microinch/second)			Groundborne Noise Impact Levels (dB re 20 micropascals)		
	Frequent Events1	Occasional Events2	Infrequent Events3	Frequent Events1	Occasional Events2	Infrequent Events3
Category 1: Buildings where low ambient vibration is essential for interior operations.	65 VdB ⁴	65 VdB ⁴	65 VdB ⁴	N/A ⁴	N/A ⁴	N/A ⁴
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

Source: FTA 2018.

- 1 “Frequent Events” are defined as more than 70 vibration events per day. Most rapid transit projects fall into this category.
- 2 “Occasional Events” are defined as between 30 and 70 vibration events of the same source per day. Most commuter truck lines have this many operations.
- 3 “Infrequent Events” are defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
- 4 This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the heating, ventilation, and air conditioning (HVAC) systems and stiffened floors.
- 5 Vibration-sensitive equipment is not sensitive to groundborne noise.

Table 3.12-4. Groundborne Vibration Impact Criteria (Structural Damage)

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

Source: FTA 2018.

Notes: RMS velocity calculated from vibration level (VdB) using the reference of one microinch/second.
in/s = inches per second; PPV = peak particle velocity.

3.12.5.3 Local

California requires each local governmental entity to perform noise studies and implement a Noise Element as part of its General Plan. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels; the Noise Element must be used to guide decisions concerning land use.

The project site spans two local municipalities, the City of San Diego and the City of Santee. However, all of the nearest occupied noise-sensitive receptors are within the City of Santee. Therefore, the City of Santee noise standards are used as the primary local standards against which to assess potential noise impacts. As described below, the Santee Municipal Code lacks quantitative noise limits against which to assess project operations. For

this reason, the Noise Element of the City of Santee's *General Plan* is the primary source of noise standards used in the analysis. The relevant local noise standards are described in the following sections.

City of Santee

General Plan

The City of Santee's *General Plan – Noise Element* (City of Santee 2003) includes a Noise/Land Use Compatibility Guides for various land uses, including the noise-sensitive receptors considered in the impact analysis for the project. The guideline matrix, provided in Figure 7-3, Noise/Land Use Compatibility Guide, of the City of Santee's General Plan, is recreated as Table 3.12-5, below. The Compatibility Guide indicates that exterior noise exposures of up to 65 dB L_{dn} are normally acceptable for residences, motels/hotels, schools, hospitals, libraries, and nursing homes, whereas exterior noise exposures of up to 70 dB L_{dn} are normally acceptable for parks and playgrounds. Exterior noise exposures of up to 75 dB L_{dn} are normally acceptable for golf courses.

The City of Santee's *General Plan – Noise Element* discusses California Environmental Quality Act (CEQA) impacts and states that noise impacts would be considered significant if any of the following occur as a result of the proposed development (City of Santee 2003):

1. If, as a direct result of the proposed development, noise levels for any existing or planned development will exceed the noise levels considered compatible for that use.
2. If, as a direct result of the proposed development, noise levels which already exceed the levels considered compatible for that use are increased by 3 or more decibels.

Objective 1.0, outlined in the General Plan's *Noise Element*, includes City of Santee policies related to noise control (City of Santee 2003):

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.

Objective 2.0, outlined in the General Plan's *Noise Element*, includes further clarification of when noise mitigation should be required for future development projects:

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 on 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 on 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.

As discussed in the overview at the beginning of this section, CEQA does not currently require the evaluation of noise levels affecting the proposed new development. However, new residential living spaces will be required to comply with general plan policies and building codes for noise control.

Table 0-1. City of Santee Noise/Land Use Compatibility Guide

Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dB)						
	50	55	60	65	70	75	80
Residential – Low Density Single Family, Duplex, Mobile							
Residential – Multi Family							
Transient Lodging – Motels, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes ¹							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water							
Office Buildings, Business Commercial and Professional							
Industrial, manufacturing, utilities, agriculture							
	Normally Acceptable. Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.						
	Conditionally Acceptable. New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.						
	Normally Unacceptable. New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made, and needed noise insulation features must be included in the design.						
	Clearly Unacceptable. New construction or development should generally not be undertaken.						

Source: City of Santee 2003.

Santee Municipal Code

Chapter 5.04, Noise Abatement and Control, of the Santee Municipal Code provides the City of Santee's Noise Ordinance and is intended to address noise from non-transportation sources, such as construction activity or activities on private property. The Noise Ordinance does not apply to traffic operating on public streets.

Construction Noise

Construction noise is controlled by Santee Municipal Code Section 5.04.090 (Construction Equipment), which states the following:

Except for emergency work or work that has been expressly approved by the City, it is unlawful for any person to operate any single or combination of powered construction equipment at any construction site, as follows:

- 1 It is unlawful for any person to operate any single or combination of powered construction equipment at any construction site on Mondays through Saturdays except between the hours of 7:00 a.m. and 7:00 p.m., unless expressly approved by the Director of Development Services.
- 2 It is unlawful for any person to operate any single or combination of powered construction equipment at any construction site on Sundays or City recognized holidays unless expressly approved by the Director of Development Services.
- 3 No construction equipment is permitted to be started, idled, moved or operated at any location before 7:00 a.m. or after 7:00 p.m. on Mondays through Saturdays and all times on Sundays and holidays, described in subsection (A)(2) of this section. Specific exemptions may be authorized by the Director of Development Services.
- 4 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. If work involving such equipment will involve more than 10 consecutive workdays, a notice must be provided to all property owners and residents within 300 feet of the site no later than 10 days before the start of construction. The notice must be approved by the City and describe the project, the expected duration, and provide a point of contact to resolve noise complaints."

Operational Noise

Santee Municipal Code does not provide quantitative noise standards, such as explicit dBA noise level limits, for operational noise sources. Qualitative guidance is provided with restrictions, such as not generating noise levels "louder than the average conversational level," or that "annoy or disturb the quiet, comfort or repose of neighboring residents or persons of normal sensitivity." Such guidance is subjective and does not lend itself to use as a threshold of impact. For this reason, the City of Santee's General Plan Noise Element noise/land use compatibility guidelines are used to assess operational noise levels.

Because the project includes a sewer lift station with an emergency generator, City of Santee standards related to emergency work are also relevant. The City of Santee defines emergency work as "work made necessary to restore property to a safe condition following a public calamity or work required to protect persons or property from imminent exposure to danger or damage or work by public or private utilities when restoring utility service." As such,

an emergency generator supporting a sewage system would qualify as emergency work, which is exempted from the noise standards under the following conditions:

1. The Noise Control Officer has been notified in advance, if possible, or as soon as practical after the emergency; and
2. Any motor vehicle, apparatus, or equipment used, related to or connected with emergency work is designed, modified or equipped to reduce sounds produced to the lowest possible level consistent with effective operation of such vehicle, device, apparatus, or equipment.

3.12.6 Project Impact Analysis

3.12.6.1 Methodology

Construction Noise and Vibration

Potential noise and vibration impacts associated with project construction activities were evaluated based on the proposed project's construction equipment schedule and phasing information provided by the project design team. Construction equipment schedules were developed for three major construction elements: (1) Residential West, (2) Residential North, and (3) the golf course and hotel facility. Each element would be broken down into individual construction phases, which would each include a different mix of construction equipment. Over the course of project construction, various phases are anticipated to overlap.

Noise

Construction-related noise was analyzed using data and modeling methodologies from the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) (FHWA 2008), which predicts average noise levels at nearby receptors by analyzing the type of equipment, the distance from source to receptor, usage factor (i.e., the fraction of time the equipment is operating in its noisiest mode while in use), and the presence or absence of intervening shielding between source and receptor. This methodology calculates the combined average noise levels for all equipment items scheduled during each construction phase. The average construction noise level for an 8-hour workday (i.e., 8-hour L_{eq} or $L_{eq(8h)}$) during each phase of construction was calculated at a reference distance of 50 feet. The reference noise levels were then adjusted for each receptor based on the distance from each phase of construction to each receptor. These distances were estimated using project plans and aerial photography (Google Earth Pro 2023). For construction phases occurring immediately adjacent to a receptor, it was assumed that construction noise would propagate over acoustically hard ground (e.g., packed dirt), and noise levels would be reduced at a rate of 6 dB per doubling of distance. For construction phases occurring at greater distances, it was assumed that construction noise would propagate over acoustically soft ground (i.e., unpaved ground with grass, trees, and other plants), and noise levels would be reduced at a rate of 7.5 dB per doubling of distance (refer to Section 3.12.2.6, Sound Propagation, for additional discussion of noise attenuation with distance). Additional noise attenuation that may occur due to barrier effects of intervening structures (e.g., walls, fences, buildings) or topography was excluded from the modeling. Finally, once the noise levels from each construction phase were calculated individually, the noise levels for any overlapping phases were added together to determine the total construction noise levels at each receptor.

Noise from construction traffic was also analyzed. The methodology for traffic noise analyses is described under *Traffic Noise*, below.

Vibration

Construction-related vibration was analyzed using data and modeling methodologies provided by FTA’s *Transit Noise and Vibration Impact Assessment* (FTA 2018). This guidance manual provides typical vibrational source levels for various types of construction equipment, as well as methods for estimating the propagation of groundborne vibration over distance. Table 3.12-6 provides the PPV levels that are representative of worst-case construction equipment expected to be used as part of the proposed project; vibrational levels from a vibratory roller are representative of vibratory equipment, such as plate compactors, and vibrational levels from a large bulldozer are representative of heavy earthmoving equipment, such as graders, excavators, and scrapers. The vibrational levels are provided for a reference distance of 25 feet.

Table 3.12-6. Construction Equipment Vibration Levels

Equipment Item	Reference Velocity Level at 25 Feet, VdB	Reference RMS Velocity Level at 25 Feet, in/sec
Small bulldozer ¹	58	0.003
Loaded trucks	86	0.076
Large bulldozer ²	87	0.089

Source: FTA 2018.

Notes: in/s = inches per second; PPV = peak particle velocity.

¹ Considered representative of other heavy earthmoving equipment (e.g., excavators, graders, backhoes).

² Considered representative of smaller equipment (e.g., small skid steers, mini excavators).

The following equation from the guidance manual was used to estimate the change in PPV levels over distance:

$$PPV_{rec} = PPV_{ref} \times (25/D)^n$$

where PPV_{rec} is the PPV at a receptor; PPV_{ref} is the reference PPV at 25 feet from the equipment; D is the distance from the equipment to the receptor, in feet; and n is a value related to the vibration attenuation rate through ground (the default recommended value for n is 1.1).

Operational Noise

Traffic Noise

Traffic noise in the noise study area was analyzed based on data from the Local Transportation Analysis (LTA) for the proposed project (Intersecting Metrics 2024) (Appendix O2). The analysis was conducted using a spreadsheet model, with calculations from the FHWA *Traffic Noise Model*, Version 2.5, Look-Up Tables (FHWA 2004). The inputs used in the traffic noise modeling included average daily traffic (ADT) data provided by the LTA, assumed traffic mix and daily distribution (i.e. the percentage of automobiles versus medium trucks and heavy trucks during each hour of the day), and traffic speeds based on the posted speed limits. To quantify the direct and cumulative effects of the project, traffic noise was analyzed using six different scenarios: (1) Existing; (2) Existing with Project; (3) Near-Term Year (2026) without Project; (4) Near-Term Year (2026) with Project; (5) Horizon Year (2035) without Project; and (6) Horizon Year (2035) with Project. The noise modeling is provided in Appendix M.

The same traffic noise model was used to estimate construction traffic noise based on vehicle trips estimated as part of the air quality and greenhouse gas analyses (Section 3.2, Air Quality, and Section 3.7, Greenhouse Gas Emissions). The worst-case daily construction trips were used in the analyses and included both worker vehicle trips

(i.e., construction workers commuting to and from the site) and truck trips (i.e., vendor trips/deliveries and haul trucks). Potential impacts were assessed by comparing construction traffic noise levels with existing traffic noise levels.

On-Site Operations

Multiple noise sources associated with the proposed project have been identified and analyzed for potential impacts at nearby noise-sensitive receptors. The following on-site noise sources and activities were considered in the analysis: (1) mechanical equipment installed at the hotel and clubhouse facilities; (2) live music located at the outdoor patio of the clubhouse/restaurant; (3) a wedding ceremony located at the outdoor patio of the clubhouse/restaurant; (4) pool activities within the hotel pool and spa area; (5) loud music associated with events held inside the hotel banquet hall; and (6) outdoor activities associated with the recreational areas proposed at both residential developments (a park/playground at Residential West, and a swimming pool and a park/playground at Residential North). Representative noise levels for each scenario were obtained from similar events occurring at the existing project site or similar venues in Southern California, or referenced from past projects, published data, or recognized noise models. The specifics of these events and the noise measurements conducted are described in greater detail below.

Park/Playground

Noise measurements were taken at an existing YMCA in La Jolla, California, by Ldn Consulting Inc. on August 23, 2013. The measurements included approximately 20 children playing in an outdoor area. Based on empirical data collected, noise associated with children playing outdoors was 63 dBA at 35 feet. A worst-case noise level of 63 dBA at 35 feet will be used from the center of each playground area. The park in Residential West is more than 300 feet from the existing single-family residences to the north and will be shielded by the proposed homes. The park in Residential North is more than 100 feet from the existing single-family residences to the north. Therefore, noise levels associated with the parks and playgrounds would be well below the City of Santee's 65 dBA property line standard.

Pool Equipment Noise Levels

To determine the noise environment and to assess potential noise impacts, noise measurements were taken at an existing pool facility at the Cal-a-Vie Health Spa, located at 29402 Spa Haven Way, Vista, California. The measurements consisted of two 15-horsepower pool pumps and filtration pumps, which would be considered a worst-case configuration for the proposed development. All equipment was fully operational during the measurements. The short-term measurement of the on-site pump operations and equipment was 57.8 dBA L_{eq} at a distance of 25 feet.

Pool Activity Noise Levels

Noise level measurements of typical daily operations of outdoor pool activities were taken at the San Diego YMCA facility in Oceanside on September 13, 2009. The Oceanside YMCA measurement consisted of open swimming activities of 25 children in the main pool area. The measured noise levels from the existing facility were amortized over an hour and found to have a worst-case noise level of 68.8 dBA L_{eq} at a distance of 20 feet. The pool equipment noise levels were combined with the pool activities noise levels, resulting in a cumulative noise reference level for the community pool areas of 67.4 dBA L_{eq} at a distance of 25 feet. The pool area in Residential North is more than 300 feet from the existing single-family residences to the north and will be shielded by the proposed homes.

Therefore, noise levels would be reduced to approximately 44 dBA and will be well below the City of Santee's 65 dBA property line threshold.

Air Conditioning Units

Rooftop mechanical heating, ventilation, and air conditioning (HVAC) units will be installed on the proposed clubhouse. To evaluate the HVAC noise impacts, the analysis used reference noise level measurements taken at a Vons Shopping Center in Murrieta, California, in 2010. The unshielded noise levels for the HVAC units were measured at 65.9 dBA L_{eq} at a distance of 6 feet. The hotel could require larger HVAC units with a cooling capacity of 18 tons having a reference noise level of 76 dBA at 3 feet (Lennox 2005).

Even though the mechanical ventilation system will cycle on and off throughout the day, this approach presents the worst-case noise condition. The noise levels associated with the rooftop mechanical ventilation system will be limited with the proposed parapet walls on each building that will vary in height but will be roughly 1 foot higher than the HVAC units to shield them both visually and acoustically. Therefore, the parapet wall will block the line-of-sight from the adjacent residential units. To be conservative, no reductions for the parapet walls were taken into account.

Exterior Live Music

Reference noise levels were gathered in September 2019 at Miramonte Winery at 33410 Rancho California Road in Temecula, California. The site provided an outdoor garden environment with a low amplification speaker system and a performance by an acoustical guitarist. The noise levels of the acoustic guitarist were taken at a distance of 25 feet from the performer. The noise levels from the music at 25 feet was 63.2 dBA and 64.4 dBA. The noise measurements of the low amplification speaker system with the noise meter located directly in front of the speaker at a distance of 5 feet was found to be 68.1 dBA, which would equate to 54.1 dBA at 25 feet. The higher reference noise level of 64.4 dBA at a distance of 25 feet will be used to determine if any control measures are needed to comply with the City of Santee's noise limits.

Music from a DJ

Reference noise levels were gathered in December 2017 at an event center located at 7520 El Cajon Boulevard in El Cajon, California, and June 2018 at an event center located at 633 Montecito Way in Ramona, California. The operational noise levels at both events consisted of a DJ system, and the noise measurements were taken at a distance of 25 feet from the speakers with the noise meter located centrally between both speakers. The noise levels from the music at 25 feet was 71.3 dBA and 75.2 dBA over a 1-hour period, respectively. The DJ can also reduce the volume resulting in lower noise levels if desired or needed.

The empirical data also found that the noise levels on the sides and behind the DJ stage drop 10 decibels due to the directional characteristics of the speakers. The higher reference noise level of 75.2 dBA at a distance of 25 feet were used to determine if any control measures are needed to comply with the City of Santee's noise limits. Additionally, it was determined that if the music were located within an enclosed building, noise levels would be reduced a minimum of 20 dB.

Wedding Event

Reference noise levels were gathered in June 2024 at a wedding event at the Monserate Winery at 2757 Gird Road in Fallbrook, California. The wedding included a ceremony and music from a DJ located inside of the event building. Based on the noise measurements during the wedding, the loudest noise levels occurred during the reception with the DJ set up inside the building with the doors open. The noise levels during the reception were found to be 82.2 dBA at 20 feet.

Golf Tournament Public Announcement System

Short-term sound level measurements were collected of a public announcement system at the Rancho Buena Vista Little League Field. These measurements were conducted during daytime hours without any activities on the fields (no players or spectators). The measurements included typical 15- to 20-second announcements and music playing for approximately 30 seconds. The noise levels were found to be 44.0 dBA at a distance of 220 feet; however, based on the short nature of the announcements, would be reduced to a noise level of 38.0 dBA. This equates to an approximate noise level of 57 dBA at 25 feet.

Parking Lots

Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale. However, the instantaneous sound levels generated by a car door slamming and engine starting up may be an annoyance to adjacent sensitive receptors. The estimated maximum noise levels associated with parking lot activities typically range from 60 to 65 dBA and are short term. The project proposes a total of 293 parking spaces at the hotel and clubhouse and would not generate a significant amount of noise-related activities. It should be noted that parking lot noises are instantaneous noise levels compared to noise standards, which are averaged over time. As a result, actual noise levels over time resulting from parking lot activities would be far lower. Therefore, based on the limited operational time of vehicles on site and distance separation to the property lines, no noise impacts are anticipated.

3.12.6.2 Thresholds of Significance

The following significance criteria are based on State CEQA Guidelines Appendix G and the City of Santee's *General Plan - Noise Element* (City of Santee 2003) and Santee Municipal Code. Where the City of Santee does not provide quantitative standards, the standards and guidelines of other agencies are used. Specifically, FTA guideline criteria are used to assess groundborne vibration. CEQA Significance Determination Thresholds provide the basis for determining the significance of impacts associated with noise and vibration resulting from the proposed project.

Impacts would be considered significant if the project were to result in any of the following:

1. Generate 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. This impact would occur if:
 - a. Construction equipment were started, idled, moved, or operated at the project site on Mondays through Saturdays, except between the hours of 7:00 a.m. and 7:00 p.m., or at any time on Sundays or City of Santee-recognized holidays, unless expressly approved by the City of Santee's Director of Development Services (based on Santee Municipal Code).

- b. Construction equipment with a manufacturer's noise rating of 85 dBA L_{max} or greater, were operated at the project site for more than 10 consecutive workdays without a notice being provided to all property owners and residents within 300 feet of the site at least 10 days before the start of construction. The notice must be approved by the City of Santee and describe the project, the expected duration, and provide a point of contact to resolve noise complaints (based on Santee Municipal Code).
 - c. Because the City of Santee does not have property line standards for construction, the County of San Diego 75 dBA L_{eq} standard is used in the analysis. Sections 36.408 and 36.409 of the County of San Diego Municipal Code address the limits of disturbing or offensive construction noise. The Municipal Code states that with the exception of an emergency, it should be unlawful to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 dB during an 8-hour period from 7:00 a.m. to 7:00 p.m.
 - d. As a direct result of the proposed project, traffic noise levels for any existing or planned noise-sensitive development would exceed the noise levels (L_{dn}) considered normally acceptable for that use as identified in Figure 7-3, Noise/Land Use Compatibility Guide, of the City of Santee's *General Plan*.
 - e. As a direct result of the proposed project, traffic noise levels at any existing or planned noise-sensitive development that already exceed the levels considered compatible for that use would be increased by 3 or more decibels (based on the City of Santee's *General Plan*).
 - f. Noise levels generated by on-site operations were to exceed the normally acceptable level of 65 dB L_{dn} identified in Figure 7-3, Noise/Land Use Compatibility Guide, of the City of Santee's *General Plan* at off-site homes.
 - g. Noise levels generated by on-site operations were to exceed the existing ambient L_{dn} by 3 dBA or more at off-site homes where the ambient noise level already exceeds the normally acceptable level of 65 dB L_{dn} .
2. Generate excessive groundborne vibration or groundborne noise levels. This impact would occur if:
- a. Groundborne vibration at off-site buildings due to on-site activity were to exceed levels identified by the *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020) as having the potential to cause building damage.
 - b. Groundborne vibration at off-site buildings due to on-site activity were to exceed levels identified by the *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020) as being "distinctly perceptible" (i.e., 0.25 in/s PPV from transient vibrational sources or 0.04 in/s PPV from continuous/frequent intermittent sources).
3. 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 2 miles of a public airport or public use airport, the project would expose people residing or working in the project area to excessive noise levels.

3.12.7 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the proposed project generate 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?

Significant impacts under this threshold would occur due to on-site construction activities and on-site operations (i.e., mechanical equipment and the sewer lift station) affecting existing off-site noise-sensitive receivers and off-site traffic noise affecting proposed on-site residential uses. Impacts from all other activities (i.e., construction traffic

and operational traffic affecting off-site receivers) would be less than significant under this threshold. Detailed impact discussions and analyses are provided below.

Impact Discussion

Construction Noise

On-Site Construction Activities

On-site construction activities would create a significant noise impact if:

- A. Construction equipment were started, idled, moved, or operated at the project site on Mondays through Saturdays, except between the hours of 7:00 a.m. and 7:00 p.m., or at any time on Sundays or City of Santee-recognized holidays, unless expressly approved by the City of Santee's Director of Development Services (based on Santee Municipal Code).
- B. Construction equipment with a manufacturer's noise rating of 85 dBA Lmax or greater, were operated at the project site for more than 10 consecutive workdays without a notice being provided to all property owners and residents within 300 feet of the site at least 10 days before the start of construction. The notice must be approved by the City of Santee and describe the project, the expected duration, and provide a point of contact to resolve noise complaints (based on Santee Municipal Code).
- C. Construction noise levels would exceed the County of San Diego standard at or beyond the property lines of any property zoned residential, an average sound level greater than 75 dB during an 8-hour period from 7:00 a.m. to 7:00 p.m.

Construction is expected to begin in the third quarter 2025 and be completed by the first quarter 2029.³ During this time, temporary increases in noise levels in the project area would occur from the operation of various construction equipment within the project site. For any individual off-site receptor, noise levels experienced over the project construction period would fluctuate, depending on the type of construction activity and the exact location(s) of the activity occurring within the project site. Appendix M provides details of the construction phases for each of the three main project elements, including the type and number of equipment items to be used and the number of hours per day that each item is expected to operate. A summary of the construction phases is provided in Table 3.12-7, and a summary of the individual source noise levels for the various anticipated construction equipment to be used at the project site is provided in Table 3.12-8.

Table 3.12-7. Summary of Construction Phases

Project Element	Construction Phase	Start Date	End Date
General Project	Import	8/4/2025	2/6/2026
	Paving	7/13/2027	1/14/2028
Residential North	Demolition	7/1/2026	9/8/2026
	Grading	8/1/2026	11/6/2026
	Wet Utilities	11/10/2026	7/12/2027
	Dry Utilities	2/27/2027	8/24/2027
	Building Construction	5/1/2027	1/12/2029
	Architectural Coating	8/1/2028	1/12/2029

³ Modeling an earlier timeframe does not change the analysis.

Table 3.12-7. Summary of Construction Phases

Project Element	Construction Phase	Start Date	End Date
Residential West	Grading	8/1/2026	10/23/2026
	Wet Utilities	11/10/2026	4/26/2027
	Dry Utilities	2/27/2027	7/16/2027
	Building Construction	5/1/2027	12/3/2028
	Architectural Coating	9/1/2028	12/3/2028
Hotel/Golf Course	Grading Excavation	8/1/2026	4/28/2027
	Grading	3/24/2027	11/30/2027
	Finish	4/2/2028	6/6/2028
	Clubhouse Construction	12/1/2027	4/29/2028
	Clubhouse Architectural Coating	3/1/2028	3/29/2028
	Hotel Construction	4/9/2028	11/15/2028
	Hotel Architectural Coating	11/20/2028	12/26/2028

Table 3.12-8. Construction Equipment and Reference Noise Levels

Equipment Item	L _{max} at 50 feet, dBA	Leq(1hr) at 50 feet, dBA
140M Blade	85	81
623 Paddle Wheel	84	80
Air Compressor	78	74
Backhoe	78	74
Compactor	83	76
Concrete/Industrial Saws	90	83
Crane	81	73
Curb Machine	77	74
Dozer	82	78
Excavator	81	77
Forklifts	79	75
Generator	81	78
Grader	85	81
Loader	79	75
Paver	77	74
Roller	80	73
Scraper	84	80
Skip Loader	78	74
Welder/Torch	75	70

Source: Obtained or estimated from FHWA 2008.

Notes: dBA = A-weighted decibels; Leq(1hr) = equivalent noise level at 1 hour; L_{max} = maximum noise level.

Construction noise levels were estimated at the nearest residential property line for each of the development areas. The construction noise analysis in Appendix M provides details regarding the estimated noise levels from each individual construction phase. The results are summarized in Table 3.12-9.

Table 3.12-9. Summary of Estimated Construction Noise Levels and Resulting Noise Increases at City of Santee Receptors

Project Element	Phase	Phase Noise Level at 50 Feet (dBA)	Distance to Nearest Receptor (Feet)	Noise Level at Nearest Receptor (dBA)
General Project	Import	78.0	100	72.0
	Paving	81.5	160	71.4
Residential North	Demolition	85.1	160	75.0
	Grading	84.8	340	68.1
	Wet Utilities	84.6	160	74.5
	Dry Utilities	78.8	160	68.7
	Building Construction	82.3	320	66.1
	Architectural Coating	74.0	320	57.6
Residential West	Grading	86.6	190	75.0
	Wet Utilities	83.6	210	71.1
	Dry Utilities	78.8	210	66.4
	Building Construction	82.3	190	70.7
	Architectural Coating	74.0	190	62.4
Hotel/Golf Course	Grading Excavation	84.6	760	61.0
	Grading	86.6	760	62.9
	Finish	84.1	760	60.5
	Clubhouse Construction	81.9	670	59.4
	Clubhouse Architectural Coating	74.0	670	51.5
	Hotel Construction	81.9	1100	55.1
	Hotel Architectural Coating	74.0	1100	47.2

Source: Appendix M.**Notes:** dBA = A-weighted decibels; $Leq(8hr)$ = hourly equivalent sound level – the average acoustical energy content of noise during a 1-hour period.

Referring to Table 3.12-9, a wide range of noise levels are predicted at the property lines, with worst-case noise levels ranging from 47.2 to 75 dBA $L_{eq}(8hr)$. It is noted that these worst-case noise levels would be limited to periods when multiple construction phases occur simultaneously at the project site closest to each receptor. At other times, construction noise levels would be much lower. If construction activity were to occur outside the City of Santee's permitted hours of Mondays through Saturdays between the hours of 7:00 a.m. and 7:00 p.m. (excluding City of Santee-recognized holidays) the impact would be significant. In addition, because construction would occur for more than 10 consecutive workdays with various construction equipment items that produce a noise level of 85 dBA L_{max} or greater (refer to Table 3.12-8), there would be a significant impact if notice were not provided to all property owners and residents within 300 feet of the project site at least 10 days before the start of construction. Because the permitted construction hours and property owner notifications are regulatory requirements of the City of Santee's Municipal Code, it is assumed they will be implemented as part of the project and, therefore, construction noise impacts would be less than significant. Because these regulatory requirements are critical to avoiding significant impacts, they are reiterated in the Regulatory Compliance Measures and Mitigation Measures section, below.

Construction Traffic

Construction traffic would create a significant noise impact if:

- A. As a direct result of the proposed project, traffic noise levels for any existing or planned noise-sensitive development would exceed the noise levels (L_{dn}) considered normally acceptable for that use as identified in Figure 7-3, Noise/Land Use Compatibility Guide, of the City of Santee's *General Plan*.
- B. As a direct result of the proposed project, traffic noise levels at any existing or planned noise-sensitive development that already exceed the levels considered compatible for that use would be increased by 3 or more decibels (based on the City of Santee's *General Plan*).

The construction activities will require as much as 279,020 cubic yards of soil import, which will require as many as 111 daily round truck trips traveling roughly 4 miles in each direction to and from Sycamore Landfill. Table 3.12-10 presents a comparison of the Existing Year with and without project construction-related traffic noise levels, as summarized from the Noise Study by Ldn Consulting (Appendix M). Note that the values given do not take into account the effect of any noise barriers or topography that may affect ambient noise levels. The roadway segment noise levels could increase 0.1 dBA L_{dn} with the construction trips of the proposed project. The project does not create a direct noise level increase of more than 3 dBA CNEL on any roadway segments, as shown in Table 3.12-10. Therefore, the proposed project's contributions to off-site roadway noise increases from construction traffic will not cause any significant impacts to any existing or future noise-sensitive land uses.

Table 3.12-10. Estimated Construction Traffic Noise Levels

Roadway/Segment	Estimated Unmitigated Traffic Noise Levels at 50 feet from Roadway Centerline (dB L_{dn})		
	Existing	Existing Plus Construction Traffic	Increase over Existing
West Hills Parkway			
Mast Boulevard–Carlton Oaks Drive	68.0	68.1	0.1
Carlton Oaks Drive			
West Hills Parkway–Wethersfield Road	61.8	61.9	0.1

Table 3.12-10. Estimated Construction Traffic Noise Levels

Roadway/Segment	Estimated Unmitigated Traffic Noise Levels at 50 feet from Roadway Centerline (dB L _{dn})		
	Existing	Existing Plus Construction Traffic	Increase over Existing
Wethersfield Road–Burning Tree Way	62.4	62.5	0.1
Burning Tree Way–Pebble Beach Drive	63.8	64.9	0.1
Pebble Beach Drive–Fanita Parkway	63.8	64.9	0.1

Source: Appendix M.

Notes: dB = decibels; L_{dn} = Day-Night Sound Level.

Operational Noise

Off-Site Traffic Noise Impacts

Operational traffic would create a significant off-site noise impact if:

- A. As a direct result of the proposed project, traffic noise levels for any existing or planned noise-sensitive development would exceed the noise levels (L_{dn}) considered normally acceptable for that use as identified in Figure 7-3, Noise/Land Use Compatibility Guide, of the City of Santee's *General Plan*.
- B. As a direct result of the proposed project, traffic noise levels at any existing or planned noise-sensitive development that already exceed the levels considered compatible for that use would be increased by 3 or more decibels (based on the City of Santee's *General Plan*).

Traffic noise levels were estimated along each of the roadway segments considered in the LTA for the proposed project. In order to quantify the direct impacts of the project, the Existing and Near-Term (2026) traffic noise levels with and without the project were considered. The traffic noise analysis is provided in Appendix M, and the relevant results are summarized in Table 3.12-11.

Traffic volumes added to local highways (i.e., SR-52 and SR-125) because of the proposed project would be negligible relative to the existing traffic volumes. Therefore, no perceptible increase in highway traffic noise would occur as a result of the project. The project would construct new buildings between the highways and some of the existing residences to the north. The presence of these new buildings would not increase highway noise levels at the existing homes and may, in fact, reduce noise levels slightly by acting as noise barriers between the highways and the homes.

Referring to the results in Table 3.12-11, two of the analyzed roadway segments do not have adjacent noise-sensitive land uses. Traffic noise levels adjacent to five of the considered roadway segments would be below the City of Santee's 65 dB L_{dn} guideline level for compatibility with residences and other noise-sensitive land uses (i.e., schools, hospitals, libraries, and nursing homes). Adjacent to the remaining four roadway segments, the with-project traffic noise level would be above 65 dB L_{dn}; however, the noise increases directly attributable to the project (0.9 to 1.4 dB) would be less than 3 dB. As a result, the project's traffic noise impacts at existing noise-sensitive land uses would be less than significant.

Table 3.12-11. Estimated Existing and Near-Term (2026) Traffic Noise Levels at 50 feet from Roadway Centerline (dB L_{dn})

Roadway/Segment	Existing	Existing with Project	Increase over Existing	2026 with Project	Increase over Existing	Significant Impact?	Reason for Impact Finding
West Hills Parkway							
Mast Boulevard–Carlton Oaks Drive	68.0	68.3	0.3	69.1	1.1	No	1
Carlton Oaks Drive–Mission Gorge Road	67.4	67.7	0.3	68.8	1.4	No	1
Mast Boulevard							
SR-52 EB Ramps–SR-52 WB Ramps	66.7	66.9	0.2	68.2	1.5	No	2
SR-52 WB Ramps–West Hills Parkway	70.2	70.3	0.1	71.3	1.1	No	2
Carlton Oaks Drive							
West Hills Parkway–Wethersfield Road	61.8	62.9	1.1	63.4	1.4	No	1.3
Wethersfield Road–Burning Tree Way	62.4	63.4	1.0	63.8	1.4	No	1.3
Burning Tree Way–Pebble Beach Drive	63.8	64.3	0.5	64.6	0.8	No	1.3
Pebble Beach Drive–Fanita Parkway	63.8	64.2	0.4	64.5	0.7	No	1.3
Fanita Parkway–Carlton Hills Boulevard	64.5	64.8	0.3	65.8	1.3	No	1
Carlton Hills Boulevard							
Mast Boulevard–Carlton Oaks Drive	64.1	64.1	0.0	64.7	0.6	No	1.3
Carlton Oaks Drive–Mission Gorge Road	67.6	67.7	0.1	68.5	0.9	No	1

Source: Appendix M.

Notes: dB = A-weighted decibels; L_{dn} = Day-Night Sound Level; SR = State Route.

- ¹ Less-than-significant impact because the noise increase directly attributable to the project is less than 3 dB.
- ² There are no noise-sensitive land uses adjacent to this roadway segment.
- ³ Less-than-significant impact because the with-project traffic noise levels remain below the City of Santee's 65 dB L_{dn} guideline level for compatibility with residences, schools, hospitals, libraries, and nursing homes.

Off-Site Impacts from On-Site Operations

On-site operations would create a significant off-site noise impact if:

- A. Noise levels generated by on-site operations were to exceed the normally acceptable level of 65 dB L_{dn} identified in Figure 7-3, Noise/Land Use Compatibility Guide, of the City of Santee's *General Plan* at off-site homes.
- B. Noise levels generated by on-site operations were to exceed the existing ambient L_{dn} by 3 dBA or more at off-site homes where the ambient noise level already exceeds the normally acceptable level of 65 dB L_{dn} .

This section examines the potential stationary noise source levels associated with the development and operation of the proposed project. Noise from a fixed or point source drops off at a rate of 6 dBA for each doubling of distance, which means a noise level of 70 dBA at 5 feet would be 64 dBA at 10 feet and 58 dBA at 20 feet. A review of the proposed project indicates that the following noise sources could all operate simultaneously:

- The park/playground at Residential West
- The swimming pool at Residential North
- The park/playground at Residential North
- Mechanical equipment at the hotel
- Mechanical equipment at the clubhouse building
- The swimming pool at the hotel
- Exterior live music at the clubhouse patio
- Interior music inside the clubhouse
- A wedding ceremony at the clubhouse patio or lawn
- Vehicles in the clubhouse/hotel parking lot
- Golf tournament announcements over public announcement speakers at the clubhouse patio or lawn

A complete description of the noise source data for all analyzed noise sources is provided in Section 3.12.6.1, Methodology.

The noise levels for each source at the hotel/golf course and Residential North along with the calculated hourly noise levels based on individual operating times are shown in Table 3.12-12 for the nearest residential property lines to the north and in Table 3.12-13 for the nearest residential property line to the east. Also included in the tables are the relative property line standards for clarity. It should be noted that Residential West is more than 3,000 feet to the west and would not cumulatively add to the noise levels. No reductions from any parapet walls were incorporated into the modeling. Based on the property line noise levels determined above, the proposed developments related operational noise levels comply with the noise standards at the property lines. No impacts are anticipated and no mitigation is required.

Table 3.12-12. Property Line Noise Levels (Northern Property Line)

Source	Distance from Source to Measurement Location (Feet)	Measured Noise Level (dBA)	Quantity	Distance to Property Line (Feet)	Noise Reduction due to Distance (dBA)	Resultant Noise Level at Property Line (dBA)
Pool (NAR)	25	67.4	1	365	-23.3	44.1
Park/Playground (NAR)	35	63	1	100	-9.1	53.9
HVAC (Hotel)	3	76	6	768	-48.2	35.6
HVAC (Clubhouse)	6	65.9	6	664	-40.9	32.8
Pool (Hotel)	25	67.4	1	698	-28.9	38.5
Outdoor Music	25	64.4	1	728	-29.3	35.1
Indoor Music	25	55.2	1	642	-28.2	27.0
Wedding Ceremony	20	82.2	1	688	-30.7	51.5
Parking Lot	25	65	1	384	-23.7	41.3
Golf Tournament	25	57	1	818	-30.3	26.7
Cumulative Noise Level at Property Line (dBA)						56
Property Line Standard for Single-Family Residential						65

Table 3.12-13. Property Line Noise Levels (Eastern Property Line)

Source	Distance from Source to Measurement Location (Feet)	Measured Noise Level (dBA)	Quantity	Distance to Property Line (Feet)	Noise Reduction Due to distance (dBA)	Resultant Noise Level at Property Line (dBA)
Pool (NAR)	25	67.4	1	1510	-35.6	31.8
Park/Playground (NAR)	35	63	1	1620	-33.3	29.7
HVAC (Hotel)	3	76	6	790	-48.4	35.4
HVAC (Clubhouse)	6	65.9	6	674	-41.0	32.7
Pool (Hotel)	25	67.4	1	864	-30.8	36.6
Outdoor Music	25	64.4	1	692	-28.8	35.6
Indoor Music	25	55.2	1	644	-28.2	27.0
Wedding Ceremony	20	82.2	1	654	-30.3	51.9
Parking Lot	25	65	1	796	-30.1	34.9
Golf Tournament	25	57	1	572	-27.2	29.8
Cumulative Noise Level at Property Line (dBA)						52
Property Line Standard for Single-Family Residential						65

Sewer Lift Station

In addition to the on-site noise sources identified in the previous section, the project would include a sewer lift station. The lift station would be located at the eastern end of the Residential West development. Based on information from the Supplemental Sewer Study for the project (Dexter Wilson Engineering Inc. 2022), the pump station is expected to include two submersible sewage pumps in a precast-concrete wet well. Each pump would be capable of pumping the total lift station design flow; thus, there would be 100% redundancy for the mechanical equipment. The lift station would have emergency power generation, emergency sewer storage, emergency force-main connections, and odor-control equipment, including a chemical scrubber at the wet well (with provisions for adding a more aggressive odor-control system, if necessary). The emergency power generator would be mounted on an exterior concrete pad to provide backup power if commercial power were to go out. The emergency power generator would have a sound-attenuated, weatherproof enclosure. The final design of the sewer lift station, including detailed hydraulic calculations for proper pump selection and wet-well sizing, would be undertaken concurrently with the preparation of final engineering and improvement plans for the project.

Use of the emergency generator would qualify as “emergency work” under the City of Santee’s Municipal Code, and would be exempt from the noise standards, provided its operation complies with the Municipal Code requirements that (1) the Noise Control Officer is notified in advance, if possible, or as soon as practical after any emergency requiring the use of the generator, and (2) the emergency generator is designed, modified or equipped to reduce sounds produced to the lowest possible level consistent with its effective operation. Because these are regulatory requirements of the City of Santee’s Municipal Code, it is assumed they will be implemented as part of the project and, therefore, emergency generator noise impacts would be less than significant. Because these regulatory requirements are critical to avoiding significant impacts, they are reiterated in the Regulatory Compliance Measures and Mitigation Measures section, below.

The equipment noise levels were modeled to the nearest existing residences to the east. The equipment described below are the potential noise sources at the proposed sewer lift station.

Pumps

Based on a similar underground pump station, the pumps would generate a noise level of 45 dBA at a distance of 15 feet from the access hatch (Pacific Noise Control 2006).

Transformer

The proposed transformer has an unshielded noise rating of less than 51 dBA at 5 feet (National Electric Manufacturers Association 1993).

Generator

To assess the generator noise levels, tested outdoor sound levels were provided by the manufacturer/supplier. The noise ratings provided indicate the generator will produce noise levels of 75 dBA during weekly engine exercise and during normal operation when measured at a distance of 23 feet in all directions. The manufacturer specifications are provided in Attachment B to the Noise Study (Appendix M).

Cumulative Noise Levels

The noise levels for each of the sources were combined to determine the cumulative noise levels at the proposed residential property line to the west. Additionally, the project is proposing 6-foot-high fencing around the perimeter of the pump station, which would reduce the noise levels a minimum 5 dBA. The source levels have been adjusted to account for the 5 dBA reduction. The projection includes the pumps, transformer, and generator operating at the same time. Although it is unlikely all the noise sources would be operating at the same time, this method is considered ultra conservative in determining impact potential. The cumulative noise levels at the proposed residential property line to the west is listed in Table 3.12.14.

Table 3.12-14. Sewer Lift Station Noise Levels

Source	Distance from Source to Measurement Location (Feet)	Measured Noise Level (dBA)	Distance to Nearest Property Line (Feet)	Noise Reduction Due to Distance (dBA)	Resultant Noise Level at Property Line (dBA)
Pumps	15	40	30	-6	34
Transformer	5	46	34	-17	29
Generator	23	70	48	-6	64
Cumulative Noise Level at Property Line (dBA)					64
Property Line Standard for Single-Family Residential					65

The resultant cumulative noise level at the proposed residential property line to the west is projected to be at or below 64 dBA Leq. Additionally, the existing residential property line to the north is located further away, further reducing the anticipated noise levels. Therefore, cumulatively the proposed sewer lift station–related operational noise levels comply with the daytime and nighttime noise standards at the existing residential uses to the north and the proposed residential uses to the west.

On-Site Noise Impacts

CEQA is intended to protect the existing environment from impacts that would result from the proposed project. Generally, CEQA does not consider impacts of the existing environment on a proposed land use to be significant (see CEQA Guidelines Section 15126.2). However, the City of Santee’s *General Plan – Noise Element* (City of Santee 2003) contains the following development standards that should be applied to future projects during the discretionary review process:

1. Whenever it appears that new development will result in any existing or future noise sensitive uses being subjected to noise levels of 65 dB(A) L_{dn} , or greater, as depicted on Figure 7-2 [of the General Plan], an acoustical study will be required.

For residential uses, noise sensitive areas shall include rear yard areas on single family residences and ground floor common areas and private patio areas for multiple family residences. For other noise sensitive uses such as libraries, schools or hospitals, noise sensitive areas shall be those areas that serve a significant function for the use that could be adversely affected by noise. Examples include resting or patient recovery areas at hospitals, outdoor service areas for churches (excluding areas used for short-term social gatherings) or outdoor teaching or discussion areas at schools (does not include playgrounds or other active outdoor areas).

2. If the acoustical study shows that the noise levels at any noise sensitive area will exceed 65 dB(A) L_{dn} , the development should not be approved unless the following findings are made.
 - a. Modifications to the development have been, or will be made, which will reduce the exterior noise level in noise sensitive areas to 65 dB(A) L_{dn} or less, or
 - b. If, with current noise abatement technology, it is not feasible to reduce the exterior noise level to 65 dB(A) L_{dn} or less, then modifications to the development will have been, or will be made which reduce the exterior noise level to the maximum extent feasible and the interior noise level to 45 dB(A) L_{dn} or less. Particular attention shall be given to noise sensitive spaces such as bedrooms.
For rooms in noise sensitive areas which are occupied only for a part of the day, (schools, libraries or similar), the interior one-hour average sound level during occupation, due to noise outside, should not exceed 45 dB(A) L_{eq} (hour).

Therefore, because noise-sensitive land uses (i.e., homes) are proposed as part of the project, the potential for ambient noise levels (primarily from vehicle traffic) to exceed 65 dB L_{dn} at the proposed homes is addressed below. Based on the traffic data provided by the LTA (Appendix O2), worst-case traffic noise levels in the project vicinity would occur under future conditions because of the predicted cumulative growth in traffic volumes. Therefore, the assessment of on-site noise levels was based on future conditions.

The initial source of future noise levels referenced in the analysis is Figure 7-2, Future Noise Levels, of the City of Santee's *General Plan – Noise Element* (City of Santee 2003). This is supplemented with future traffic noise levels estimated from the future traffic data provided by the LTA.

To determine the future noise environment and impact potentials, the roadway segment noise levels projected in the Noise Study were calculated using the methods in the Highway Noise Model published by the Federal Highway Administration (FHWA 1978). The FHWA Model uses the traffic volume, vehicle mix, speed, and roadway geometry to compute the equivalent noise level. The peak hour traffic volumes range between 6% and 12% of the ADT, and 10% is generally acceptable for noise modeling.

A spreadsheet calculation was used that computes equivalent noise levels for each of the time periods used in the calculation of L_{dn} . Weighting these equivalent noise levels and summing them gives the L_{dn} for the traffic projections. The results of the specific noise modeling are provided in the Noise Study by Ldn Consulting (Appendix M). According to the analysis, the model is overestimating the noise levels at Residential West by approximately 11 dBA above the measured noise levels. This is due to SR-52 being elevated above the site as well as barriers along the roadways. Using the Fresnel Barrier Reduction Calculations, it was confirmed that the existing topography is providing an approximate 11 dBA noise reduction from SR-52.

It was determined that a minimum 6-foot barrier along West Hills Parkway would be required at the proposed Residential West to meet the City of Santee's 65 dBA L_{dn} noise threshold. Additionally, It was determined that a minimum 6-foot barrier along Carlton Oaks Drive would be required at the proposed Residential North to meet the City of Santee's 65 dBA L_{dn} noise threshold. The 6-foot barriers are shown on the landscape plans and are required per **MM-NOI-1**. The sensitive use areas associated with the hotel and golf course are located over 1,000 feet from any local area roadways. Therefore, noise would be well below the City of Santee's 65 dBA threshold, and no additional mitigation is required. The barriers must be constructed of a non-gapping material consisting of masonry, ½-inch-thick glass, earthen berm, or any combination of these materials.

Impact Determination

Impact NOI-1: Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels in Excess of Established Standards.

Implementation of the proposed project would create a significant noise impact because 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. Significant impacts would occur at existing residences due to noise from the on-site sewer lift station (based on the City of Santee Municipal Code), and at proposed new on-site residences due to future traffic noise (based on the City of Santee's *General Plan*). In addition, the planned operation of the proposed hotel and clubhouse includes important assumptions about the style, timing, and location of music that will be permitted on site; because these assumptions are critical for controlling potential music noise impacts from the project, they are included as mitigation measures to ensure that they will be implemented as part of the project.

Regulatory Compliance Measures and Mitigation Measures

Regulatory Compliance Measure (RCM) NOI-1 and **RCM-NOI-2** will provide compliance with applicable City of Santee Municipal Code regulations required to ensure the noise impacts associated with project construction are less than significant.

RCM-NOI-1. Restrict project construction activity to the days and hours permitted by the City of Santee Municipal Code. Construction equipment at the project site will not be started, idled, moved, or operated on Mondays through Saturdays, except between the hours of 7:00 a.m. and 7:00 p.m., or at any time on Sundays or City of Santee-recognized holidays, unless expressly approved by the City of Santee's Director of Engineering.

RCM-NOI-2. Provide construction notices to all property owners and residents within 300 feet of the project site. A City of Santee-approved construction notice will be prepared for the project that describes the project and its expected duration and provides a point of contact to resolve noise complaints. The project proponent will coordinate with the City of Santee to ensure that the notice is approved in advance of construction. The notice will be delivered to all property owners and residents within 300 feet of the project site at least 10 days before the start of construction.

Regulatory Compliance Measures **RCM-NOI-3** and **RCM-NOI-4** will provide compliance with City of Santee Municipal Code regulations required to ensure that operation of the emergency generator at the sewer lift-station properly qualifies as "emergency work" and is exempt from the provisions of Chapter 5.04 (Noise Abatement and Control) of the Municipal Code.

RCM-NOI-3. Notify the Noise Control Officer of emergency generator use. In the event of an emergency that requires the use of the sewer lift-station emergency generator to maintain the safe operation of the lift station, the Noise Control Officer must be notified as soon as practical after the emergency. If possible, the Noise Control Officer should be notified in advance.

RCM-NOI-4. Provide construction notices to all property owners and residents within 300 feet of the project site. The sewer lift-station emergency generator shall be designed, modified, or equipped to reduce sounds produced to the lowest possible level consistent with its effective operation.

Mitigation Measure (MM) NOI-1 and MM-NOI-2 are recommended to reduce the traffic noise impacts at proposed on-site residences.

MM-NOI-1. Implement the noise-control measures to meet the city's 65 dBA L_{dn} noise threshold at the private rear yards. Prior to Certificate of Occupancy, a 6-foot noise barrier would be required along Carlton Oaks Drive to reduce noise levels at Residential North and along West Hills Parkway to reduce noise levels at Residential West to below the City's 65 dBA L_{dn} noise threshold. The location of the 6-foot barriers are shown on the landscape plans. The barriers must be constructed of a non-gapping material consisting of masonry, ½ inch thick glass, earthen berm or any combination of these materials.

MM-NOI-2. Conduct an acoustical study to reduce interior noise levels at noise-sensitive areas of proposed residential development. Mitigation is required at the proposed Residential West and to the single-family homes adjacent to Carlton Oaks Drive within the proposed Residential North. Prior to the issuance of building permit(s) for the identified homes as shown on the landscape plans, the applicant will retain a qualified acoustical consultant to prepare an acoustical report to address interior noise levels at the homes. The specific noise limits to be achieved are described below. The analysis will be submitted to the City of Santee's Planning & Building Director for approval. The recommendations of the report will be incorporated into the project's site and architectural plans and be implemented during project construction. The acoustical report will satisfy the following requirements:

- The acoustical report will evaluate the designs and provide recommendations, as necessary, to ensure that interior noise levels due to exterior noise sources will not exceed 45 dB L_{dn} .
- Techniques to achieve the required noise control may include, but are not limited to, the following:
 - Orient bedrooms away from noise sources.
 - Limit the size and number of openings (e.g., windows, doors) and penetrations (e.g., vents, pipes, conduits) on exterior facades, especially facades facing the street.
 - Use sound-rated doors and windows.
 - Upgrade construction of walls, roofs, and attics, including added insulation.
 - Add a mechanical ventilation/air-conditioning system so that a habitable environment can be maintained with doors and windows closed.

MM-NOI-3 will ensure that the project does not generate excessive noise levels from music at the proposed hotel and clubhouse.

MM-NOI-3. Restrict the style, timing, and location of music permitted on site. The following restrictions will be applied to the project and be included as conditions of approval in the project's conditional use permit (CUP).

- No exterior music or amplified sound (including speech) will occur at the project site after 10:00 p.m.
- Live or amplified music will be permitted only at the outdoor patio of the clubhouse/restaurant or inside the banquet hall.
- All windows and doors to the exterior of the building from the banquet hall will remain closed while music is being performed inside the banquet hall.
- The following restrictions will apply to music at the outdoor patio of the clubhouse/restaurant:
 - Music may include amplified vocals and amplified instruments, such as a guitar or piano/keyboard, but will not include live drums or percussion (either amplified or non-amplified).
 - Music will be restricted to acoustic-style performances with no more than two performers.
 - Music levels will be compatible with background entertainment of guests and diners at the clubhouse/restaurant patio. Additional amplification (e.g., amplification to extend music performance audio to other areas of the project) will not be permitted.

Level of Significance After Mitigation

With the implementation of **RCM-NOI-1**, **RCM-NOI-2**, **MM-NOI-1**, **MM-NOI-2**, and **MM-NOI-3**, noise impacts associated with project construction and operation (**Impact NOI-1**) would be less than significant.

Threshold 2: Would implementation of the proposed project generate excessive groundborne vibrational or groundborne noise levels?

Impact Discussion

Project construction or operations would create a significant off-site vibration impact if:

- A. Groundborne vibration at off-site buildings due to on-site activity was to exceed levels identified by the *Transit Noise and Vibration Impact Assessment* (FTA 2018) as having the potential to cause building damage.
- B. Groundborne vibration at off-site buildings due to on-site activity was to exceed levels identified by the *Transit Noise and Vibration Impact Assessment* (FTA 2018) for human annoyance.

Construction Vibration

As discussed previously, groundborne vibration can cause two types of impact: (1) damage to structures; and (2) annoyance to people. Damage to a structure can occur regardless of the use of a specific building. Annoyance to people is assessed only at occupied vibration-sensitive buildings. As previously mentioned, the nearest residences to be affected by construction of Residential West and Residential North are the single-family homes located adjacent to the project to the north along Carlton Oaks Drive and Inverness Road. Based on aerial photography and the existing topographic maps, a majority of the homes are set back from the property lines by 30 to 50 feet. However, the worst-case residence is located along Inverness Road, with an existing structure as close as 18 feet from the property line.

Because vibration impacts are assessed based on the PPV, the worst-case (i.e., closest) distance between each source (i.e., construction equipment) and receptor (i.e., home) should be used in the analysis, rather than an average distance. Due to the constraints of the equipment, larger equipment would not be working adjacent to the

property lines. However, smaller equipment could potentially work adjacent to the property lines. Table 3.12-15 lists the resultant vibration levels based on the distances to the that would be experienced at the nearest vibration-sensitive land uses (i.e. the existing residential structures) from the temporary construction activities.

The FTA has determined vibration levels that would cause annoyance to a substantial number of people and potential damage to building structures. The FTA criterion for vibration induced structural damage is 0.20 in/sec for the PPV. Project construction activities would result in PPV levels below the FTA's criteria for vibration induced structural damage. Therefore, project construction activities would not result in vibration induced structural damage to residential buildings near the construction areas. The FTA criterion for infrequent vibration induced annoyance is 80 VdB for residential uses. Construction activities would generate levels of vibration that would not exceed the FTA criteria for nuisance for nearby residential uses. Therefore, vibration impacts would be less than significant.

Table 3.12-15. Vibration Levels from Construction Activities (Residential Receptors)

Equipment	Approximate Velocity Level at 25 Feet (VdB)	Approximate RMS Velocity at 25 Feet (in/sec)	Distance to Sensitive Use (Feet)	Resultant Velocity Level (VdB)	Resultant RMS Velocity (in/sec)
Small bulldozer	58	0.003	30	55.6	0.002
Loaded trucks	86	0.076	50	77.0	0.027
Large bulldozer	87	0.089	50	78.0	0.031
FTA Criteria				80	0.2
Significant Impact?				No	No

Source: FTA 2018.

¹ PPV at Distance D = PPVref x (25/D)^{1.5}

Operational Vibration

The project would not include any major permanent sources of vibration. The mechanical equipment that could be installed at individual buildings would cause some localized vibration that might be perceptible at close range (e.g., within the same building), but no perceptible vibration would occur at other properties. As a result, there would be no operational vibration impacts, and mitigation is not required.

Impact Determination

Impacts associated with construction and operational vibration would be less than significant. However, to be conservative, **MM-NOI-4** has been included.

Mitigation Measures

MM-NOI-4. Observe buffer distances during project construction. During all construction activity at the project site, the project proponent will require its construction contractor(s) to observe the following buffer distances to reduce groundborne vibration at nearby off-site buildings per Federal Transit Administration thresholds:

- Avoid vibratory compaction within 100 feet of residential buildings.

If the listed buffer distance cannot be maintained, alternative equipment can be used that avoids or reduces high vibrational levels at the source. Non-vibratory rollers may be used in place of vibratory rollers.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: 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 2 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?

Impact Discussion

The only airport within 2 miles of the project site is Gillespie Field, which is approximately 1.4 miles southeast of the project site. Noise contour maps for the airport are provided in Exhibit IV-4, Airport Noise Contours Existing Conditions, and Exhibit IV-5, Airport Noise Contours Future Conditions (San Diego County Regional Airport Authority 2010). Referring to those exhibits, the project site is approximately 0.25 miles outside both the existing and future 60 dB L_{dn} noise contours from Gillespie Field. Additionally, the proposed project does not include any components that would increase air traffic or require changes to existing air traffic patterns. As such, overflights are anticipated to continue to be audible at the project site; however, the proposed project is not anticipated to increase exposure to excessive noise levels from airport operation. Therefore, impacts would be less than significant, and no mitigation is required.

Impact Determination

Impacts associated with aircraft noise would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.12.8 Cumulative Impacts and Mitigation Measures

Cumulative noise or vibration impacts can occur when two or more projects are under construction simultaneously or generate operational noise or vibration at the same time. Because noise and vibration are localized effects that decrease with distance from the source, significant cumulative impacts typically do not occur unless two or more projects are located close to a single receiver. The presence of any natural or constructed barriers (e.g., hills, topography, walls, buildings) between a project site and a receiver would increase the rate of noise reduction over distance and would further reduce any cumulative noise levels. Related projects in the vicinity of the noise- and vibration-sensitive receivers considered in this analysis would include construction and/or operational activities that could occur simultaneously with the construction and/or operation of the proposed project, depending on project timing.

Cumulative Threshold 1: Would implementation of the proposed project generate 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?

The geographic scope of consideration for noise impacts is 0.5 miles. At this distance, noise from most everyday activities would be below ambient noise levels and likely inaudible. Therefore, 0.5 miles serves as a conservative buffer that would be sufficient even if any related projects have the potential to produce unusually high noise levels. Based on Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, seven related projects are within 0.5 miles of the proposed project boundary. A summary is provided in Table 3.12-16.

Table 3.12-16. Summary of Related Projects Within 0.5 Miles

Project Name	Description	Location	Status	Approximate Closest Distance to Project Site
Prospect Estates II Subdivision	38 condominiums, 15 single-family homes	8705 Marrokal Lane	Under construction	1,500 feet
Woodspring Suites Hotel	120-guestroom, 4-story hotel	8707 Mission Gorge Road	Under construction	800 feet
Prospect Avenue Subdivision	4 single-family homes	8732 Prospect Avenue	Pending Entitlement	1,800 feet
Laurel Heights Condominiums	80 residential condominium units	7750 Laurel Heights Drive	Approved, Under Construction	2,400 feet
Ukrainian Catholic Church	4,400-square-foot church	9308 Carlton Oaks Drive	Under construction	1,800 feet
Aubrey Glen Townhomes	52 residential townhomes	7737 Mission Gorge Road	Pending entitlement	1,600 feet
Soapy Joe's	Express Car Wash conversion	9015 Mission Gorge Road	Approved, not built	850 feet

Source: City of Santee 2025.

Construction Noise

Impact thresholds for construction noise are related to the permitted hours of construction (i.e., 7:00 a.m. to 7:00 p.m. Monday through Saturday, excluding City of Santee-recognized holidays) and required noticing of property owners and residents within 300 feet of the site (refer to Section 3.12.6.2, Thresholds of Significance, for details). With implementation of Regulatory Compliance Measures **RCM-NOI-1** and **RCM-NOI-2**, the proposed project would fully comply with these requirements and would not contribute to any cumulative impacts, even if related projects were constructed outside of the permitted hours or failed to provide proper notice to nearby property owners and residents. As a result, the proposed project would not result in a cumulatively considerable contribution to construction noise impacts in the vicinity of the project.

Operational Noise

Off-Site Traffic Noise Impacts

Traffic noise levels were estimated along each of the roadway segments considered in the LTA for the proposed project. Three scenarios were considered to quantify cumulative traffic impacts: Existing Conditions, Future-without-Project Conditions (i.e., 2035 conditions with all anticipated future growth except the proposed project), and Future-with-Project Conditions (i.e., 2035 conditions with all anticipated future growth including the proposed project). The traffic noise analysis is provided in Appendix M, and the relevant results are summarized in Table 3.12-17.

Referring to the results in Table 3.12-17, two of the analyzed roadway segments do not have adjacent noise-sensitive land uses. Future-with-Project traffic noise levels adjacent to five of the considered roadway segments would remain below the City of Santee's 65 dB L_{dn} guideline level for compatibility with residences and other noise-sensitive land uses (i.e., schools, hospitals, libraries, and nursing homes), so there would be no significant cumulative impact at these locations. Adjacent to the remaining four roadway segments, the Future-with-Project traffic noise level would be above 65 dB L_{dn} . At three of these segments, existing noise levels already exceed 65 dB L_{dn} , and the total cumulative increases (0.7 to 3.0 dB) would be less than or equal to 3 dB, so there would be no significant cumulative impact at these locations, either. Adjacent to the final segment, existing noise levels are below 65 dB L_{dn} , but future noise levels would exceed 65 dB L_{dn} ; however, this exceedance would occur with or without the project, and total noise increases (1.6 dB) due to all cumulative growth (including the project) would be less than 3 dB. Furthermore, the future increase directly attributable to the project would be only 0.3 dB. As a result, the proposed project would not result in a cumulatively considerable contribution to traffic noise impacts in the vicinity of the project.

Table 3.12-17. Estimated Existing and Future (2035) Traffic Noise Levels at 50 feet from Roadway Centerline (dB L_{dn})

Roadway/Segment	Existing	Future (2035) without Project	Future (2035) with Project	Increase over Existing	Increase over Future without Project	Significant Cumulative Impact?	Reason for Impact Finding
West Hills Parkway							
Mast Boulevard–Carlton Oaks Drive	68.0	69.4	69.5	1.5	0.1	No	A
Carlton Oaks Drive–Mission Gorge Road	67.4	69.4	69.6	2.2	0.2	No	A
Mast Boulevard							
SR-52 EB Ramps–SR-52 WB Ramps	66.7	68.7	68.8	2.1	0.1	No	B
SR-52 WB Ramps–West Hills Parkway	70.2	71.7	71.7	1.5	0.0	No	B
Carlton Oaks Drive							
West Hills Parkway–Wethersfield Road	61.8	64.1	64.8	3.0	0.7	No	C
Wethersfield Road–Burning Tree Way	62.4	64.1	64.8	2.4	0.7	No	C
Burning Tree Way–Pebble Beach Drive	63.8	64.1	64.5	0.7	0.4	No	C
Pebble Beach Drive–Fanita Parkway	63.8	64.1	64.5	0.7	0.4	No	C
Fanita Parkway–Carlton Hills Boulevard	64.5	65.8	66.1	1.6	0.3	No	A
Carlton Hills Boulevard							
Mast Boulevard–Carlton Oaks Drive	64.1	65.2	65.2	1.1	0.0	No	C
Carlton Oaks Drive–Mission Gorge Road	67.6	69.1	69.2	1.6	0.1	No	A

Source: Appendix M.

Notes: A = Less than significant cumulative impact because the total cumulative noise increase is less than 3 dB; B = There are no noise-sensitive land uses adjacent to this roadway segment; C = Less than significant cumulative impact because the future-with-project traffic noise levels remain below the City of Santee's 65 dB L_{dn} guideline level for compatibility with residences, schools, hospitals, libraries, and nursing homes; dB = decibels; EB = eastbound; L_{dn} = Day-Night Average; SR = State Route; WB = westbound.

Off-Site Impacts from On-Site Operations

Once the proposed project and related projects are constructed and operational, they would generate operational noise at the same time. However, noise from related projects would not combine with noise from the proposed project to create cumulative noise impacts for several reasons, as follows:

- All the related projects are proposed in developed areas with surrounding land uses and streets that already contribute to the ambient noise levels. Therefore, beyond their immediate neighbors, the related projects represent a very small increase in noise-generating activity relative to the numerous noise sources that already combine to produce the ambient noise levels in the noise study area.
- Five of the cumulative projects are residential developments that would be located in or adjacent to existing residential neighborhoods. These projects would be required to comply with the City of Santee's policies and noise ordinances and would generate low noise levels, and their contribution to overall noise levels at the receptors closest to the project site would be negligible, particularly given their large distance from the project site (approximately 1,200 to 2,600 feet).
- The proposed church would not be expected to generate high noise levels, especially during the most sensitive nighttime hours. The church would be separated from the project site by Carlton Hills Boulevard and a distance of approximately 1,800 feet. At this distance, the contribution to overall noise levels at the receptors closest to the proposed project would be negligible, particularly given the existing traffic noise sources that would dominate ambient noise levels.
- The proposed gas station and hotel projects would likely generate moderate operational noise levels during their hours of operation. Examples include car wash noise at the gas station and mechanical equipment at the hotel. However, both of these related projects are located on the opposite side of SR-52 and Mission Gorge Road, approximately 800 to 1,700 from the project site. As a result, their noise contributions at the receptors closest to the proposed project would be negligible.

As a result of all the factors described above, no significant cumulative impacts would occur related to operational noise from the proposed project and related projects.

On-Site Noise Impacts

CEQA is intended to protect the existing environment from impacts that would result from the proposed project. Generally, CEQA does not consider impacts of the existing environment on a proposed land use to be significant (see CEQA Guidelines Section 15126.2). The rationale for considering on-site noise impacts in this EIR is based on the development standards included in the City of Santee's *General Plan – Noise Element* (City of Santee 2003). Those standards are discussed in Section 3.12.7, Project Impacts and Mitigation Measures (see Threshold 1, Impact Discussion, Operational Noise, On-Site Noise Impacts). The analysis in that section already provides an assessment of cumulative on-site noise impacts because it considers Future-with-Project noise levels and, therefore, captures cumulative growth, including the proposed project. Referring to that analysis, cumulative traffic noise levels may exceed 65 dB L_{dn} at all areas of the proposed Residential West and at the single-family homes adjacent to Carlton Oaks Drive within the proposed Residential North. Because these affected land uses would be created by the project (i.e., they would not exist in the absence of the proposed project), the project would create a cumulatively considerable contribution to a significant cumulative noise impact, and mitigation is required.

Impact Determination

Implementation of the proposed project would create a significant cumulative noise impact due to future traffic noise levels in excess of 65 dB L_{dn} at proposed new residences on the project site.

Mitigation Measures

MM-NOI-1 and **MM-NOI-2** are recommended to reduce the cumulative traffic noise impacts at proposed on-site residences (refer to Section 3.12.7, Project Impacts and Mitigation Measures; Threshold 1, Mitigation Measures).

Level of Significance After Mitigation

With implementation of **MM-NOI-1** and **MM-NOI-2**, the cumulative noise impact associated with the project would be less than significant.

Cumulative Threshold 2: Would implementation of the proposed Project generate excessive groundborne vibration or groundborne noise levels?

The geographic scope of consideration for groundborne vibration impacts is 500 feet. At this distance, groundborne vibration from most vibrational sources (including high-intensity construction activities, such as pile-driving) would be imperceptible or barely perceptible. No related projects are planned within 500 feet of the proposed project. As a result, there would be no significant cumulative impact related to groundborne vibration from the proposed project and related projects.

Cumulative Threshold 3: 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 2 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?

The analysis under Threshold 3 (in Section 3.12.7, Project Impacts and Mitigation Measures) considers both existing and future noise contour maps. The future noise contour maps include the effects of projected growth and, therefore, represent future cumulative conditions. No impacts were identified based on future predicted aircraft noise levels, and the proposed project does not include any components that would increase air traffic or require changes to existing air traffic patterns. As a result, the proposed project would not result in a cumulatively considerable contribution to aircraft noise impacts in the vicinity of the project.

3.12.9 Summary of Significant Impacts

Table 3.12-18 summarizes the potentially significant direct and cumulative project impacts related to noise and vibration. The table also summarizes the required mitigation measures for each, the level of significance after mitigation, and the rationale for the findings.

Table 3.12-18. Summary of Significant Noise and Vibration Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
<p>Impact NOI-1: Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels in Excess of Established Standards.</p>	<p>RCM-NOI-1: Restrict project construction activity to the days and hours permitted by the City of Santee Municipal Code.</p> <p>RCM-NOI-2: Provide construction notices to all property owners and residents within 300 feet of the project site.</p> <p>RCM-NOI-3: Notify the Noise Control Officer of emergency generator use.</p> <p>RCM-NOI-4: Provide construction notices to all property owners and residents within 300 feet of the project site.</p> <p>MM-NOI-1: Implement the noise-control measures identified in the Noise Study by LDN Consulting. Construct a minimum 6-foot barrier along West Hills Parkway and Carlton Oaks Drive to meet the city's 65 dBA L_{dn} noise threshold.</p> <p>MM-NOI-2: Implement the noise-control measures identified in the Noise Study by LDN Consulting. Conduct an acoustical study to reduce interior noise levels at noise-sensitive areas of proposed residential development.</p> <p>MM-NOI-3: Restrict the style, timing, and location of music permitted on site.</p>	<p>Less than significant</p>	<p>RCM-NOI-1 and RCM-NOI-2 would ensure that project construction is conducted in accordance applicable City of Santee requirements.</p> <p>RCM-NOI-3 and RCM-NOI-4 will provide compliance with City of Santee Municipal Code regulations required to ensure that operation of the emergency generator at the sewer lift-station properly qualifies as "emergency work" and is exempt from the provisions of Chapter 5.04 (Noise Abatement and Control) of the Municipal Code.</p> <p>MM-NOI-1 would ensure that proposed residential development complies with City of Santee's <i>General Plan – Noise Element</i> development standards related to future noise exposure.</p> <p>MM-NOI-2 is recommended to reduce the traffic noise impacts at proposed on-site residences.</p> <p>MM-NOI-3 will ensure that the project does not generate excessive noise levels from music at the proposed hotel and clubhouse. development standards related to future noise exposure.</p>

Table 3.12-18. Summary of Significant Noise and Vibration Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Less than Significant Impact: Generate Excessive Groundborne Vibration or Groundborne Noise Levels.	MM-NOI-4: Observe Buffer Distances during Project Construction.	Less than significant before and after mitigation	MM-NOI-4 would ensure that groundborne vibration at surrounding homes is reduced to levels that would not cause building damage or substantial human annoyance.
Impact C-NOI-1: Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels in Excess of Established Standards.	MM-NOI-1: Implement the noise-control measures identified in the Noise Study by LDN Consulting. Conduct an acoustical study to reduce interior noise levels at noise-sensitive.	Less than significant	MM-NOI-1 is recommended to reduce the traffic noise impacts at proposed on-site residences.

3.12.10 References

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3.13 Population and Housing

3.13.1 Overview

This section describes existing conditions as well as applicable laws and regulations related to population and housing for the proposed Carlton Oaks Country Club and Resort Project (project). It also analyzes the proposed project’s potential to (1) induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure), and (2) displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing elsewhere.

The analysis for this section uses existing, estimated, and projected population and housing data generated by the U.S. Census Bureau, San Diego Association of Governments (SANDAG), City of Santee, City of San Diego, and County of San Diego. The U.S. Census Bureau keeps national and local databases on population, ethnicity, housing, employment, and income. The California Department of Finance produces statewide growth forecasts. Both of these agencies provide information on population and housing characteristics. SANDAG provides data on regional and local population and housing. Population projections from each of these sources were considered, as explained below.

3.13.2 Environmental Setting

The sections that follow describe existing and projected population and employment characteristics within the City of Santee, City of San Diego, and San Diego County.

3.13.2.1 Population

San Diego County is the second most populous of California’s 58 counties and the fifth largest in the United States. In 2021, San Diego County had an estimated population of 3,315,404 (County of San Diego 2022).

SANDAG, as the metropolitan planning organization, is the principal land use and transportation planning agency for the San Diego region, including the region’s 18 municipalities. As part of its planning efforts, SANDAG produces growth forecasts regarding population, housing, employment, income, and land use for the San Diego region. The Series 14 Regional Growth Forecast for 2050 was adopted by the SANDAG Board of Directors for planning purposes on December 10, 2021. According to SANDAG projections and the most recent U.S. census, San Diego’s regional population is forecast to increase from 3,309,510 in 2016 to 3,746,054 by 2050, an increase of 13.2% (SANDAG 2022a). Table 3.13-1 provides a breakdown of the existing and projected population by jurisdiction.

Table 3.13-1. Existing and Projected Population by Jurisdiction

Jurisdiction	2016 Population	2025 Population	2035 Population	2050 Population	Change Between 2016 and 2050	
					Number	Percent
City of Santee	56,434	58,358	61,897	63,070	6,636	11.8
City of San Diego	1,399,925	1,486,787	1,594,300	1,633,002	233,077	16.6

Table 3.13-1. Existing and Projected Population by Jurisdiction

Jurisdiction	2016 Population	2025 Population	2035 Population	2050 Population	Change Between 2016 and 2050	
					Number	Percent
San Diego Region	3,309,510	3,470,838	3,620,329	3,746,054	436,544	13.2

Source: SANDAG 2022a.

Regional and Local Race/Ethnicity Distribution

The majority of the population in the City of Santee is female, with males representing 48.6% of residents (U.S. Census Bureau 2023). Most people who live in the City of Santee (77.2%) are over the age of 18.

Census data determined that the majority of residents in the City of Santee (67.2%) identified themselves as White. Of the remaining population, 20.3% identified themselves as Hispanic/Latino, 5% as Asian, and 1.5% as African American. American Indian/Alaska Native and Native Hawaiian/Pacific Islander were also represented, accounting for 0.9% and 0.2% of the gross population, respectively, as shown in Table 3.13-2.

Table 3.13-2. Regional and Local Race/Ethnicity Distribution by Percentage

Race/Ethnicity	Hispanic/Latino	White	Asian	Black or African American	American Indian/Alaska Native	Native Hawaiian/Other Pacific
City of Santee	20.3	67.2	5.0	1.5	0.9	0.2
City of San Diego	30.1	42.0	17.2	6.0	0.6	0.5
San Diego County	34.8	43.8	12.9	5.6	1.4	0.6

Source: U.S. Census Bureau 2023.

3.13.2.2 Housing

Table 3.13-3 summarizes the housing occupancy rates for the City of Santee, City of San Diego, and San Diego County using U.S. Census Bureau 2020 redistricting data. In the City of Santee there were approximately 21,848 housing units within city limits, of which 97.2% were occupied. According to SANDAG projections, the total number of housing units is expected to increase from 20,525 in 2016 to 24,611 by 2050, an increase of 19.9%. Table 3.13-4 provides a breakdown of existing and projected housing by jurisdiction.

Table 3.13-3. Existing Regional and Local Housing Characteristics–Occupancy Rate

Area	Housing Units	Occupied Units	Vacant Units
City of Santee	21,848	21,244	604
City of San Diego	548,934	515,676	33,258
County of San Diego	1,228,505	1,158,764	69,741

Source: U.S. Census Bureau 2021.

Table 3.13-4. Existing and Projected Housing Units by Jurisdiction

Jurisdiction	2016	2025	2035	2050	Change Between 2016 and 2050	
					Number	Percent
City of Santee	20,525	21,683	24,064	24,611	4,086	19.9
City of San Diego	531,423	583,765	661,826	686,843	155,420	29.2
San Diego Region	1,190,555	1,288,207	1,409,286	1,471,286	280,731	23.6

Source: SANDAG 2022a.

Housing production at the regional level is not projected to keep pace with population growth in the coming years. SANDAG's Sixth-Cycle Regional Housing Needs Assessment (RHNA) identified the need for 171,685 housing units from 2021 to 2029 in the San Diego region and 1,219 housing units in the City of Santee. During the Fifth-Cycle RHNA (2013 to 2020), jurisdictions in the San Diego region permitted only 52% of the total number of new housing units and only 15% of the number of affordable housing units needed to meet regional demand, resulting in a shortfall of 8,214 housing units per year (SANDAG 2022b). The production of above-moderate-income housing kept up with regional need; however, there was a significant shortage when it came to very low-, low-, and moderate-income housing units throughout the region.

3.13.2.3 Employment and Income

Median household income dropped from \$59,200 to \$57,900 between 2000 and 2016 (in 2016 dollars) but was more than \$20,000 higher for White non-Hispanic residents (\$76,800) and Asian residents (\$68,300) than for Hispanic residents (\$46,700) and Black residents (\$41,700). The median individual income for males (\$30,100) is 39% higher than the median individual income for females (\$21,600). Table 3.13-5 provides a breakdown of regional median household income from 2017 to 2021.

SANDAG produces employment forecasts for the San Diego region, including the region's 18 municipalities. According to SANDAG projections, employment in the San Diego region is forecast to increase, going from 1,629,948 employment opportunities in 2016 to 2,094,017 employment opportunities in 2050. The City of Santee is also forecast to see an increase in employment, going from approximately 18,186 jobs in 2016 to an estimated 25,997 jobs in 2050. Table 3.13-6 provides a breakdown of existing and projected regional employment between 2016 and 2050.

Table 3.13-5. Median Household Income, 2017-2021

Jurisdiction	Median Household Income (in 2021 dollars)
City of Santee	\$92,848
City of San Diego	\$89,457
San Diego County	\$88,240

Source: U.S. Census Bureau 2023.

Table 3.13-6. Existing and Projected Job Opportunities by Jurisdiction

Jurisdiction	2016 Jobs	2025 Jobs	2035 Jobs	2050 Jobs	Change Between 2016 and 2050	
					Number	Percent
City of Santee	18,186	20,288	23,427	25,997	7,811	43
City of San Diego	885,298	949,332	1,022,083	1,095,374	210,076	23.7
San Diego Region	1,629,948	1,788,970	1,935,565	2,094,017	464,069	28.5

Source: SANDAG 2022a.

3.13.3 Applicable Laws and Regulations

3.13.3.1 State

California Planning and Zoning Law

According to State of California housing element consistency regulations (outlined in California Government Code Section 65583), each local city/county is required to prepare a housing element for its General Plan that assesses a community's needs, with a mandated goal to provide housing opportunities for all community segments and income groups, and establish policies to ensure that the needs are met. The housing element includes goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. Although the provision of General Plan/zoning designations that allow for adequate housing is an obligation of local governments, there is considerable state oversight to ensure that adequate numbers of all types of housing are being provided statewide. To ensure that state goals are met at the local level, the California Department of Housing and Community Development reviews all local housing elements (California Government Code Section 65583).

Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008, known as Senate Bill 375 (codified in the Government Code and California Public Resources Code), provides a planning process that coordinates land use planning, Regional Transportation Plans (RTPs), and funding priorities to help California meet the greenhouse gas reduction goals established in Assembly Bill 32. Senate Bill 375 requires metropolitan planning organizations to incorporate a Sustainable Communities Strategy (SCS) into their RTPs. Senate Bill 375 also aligns the RHNA planning process through development of each metropolitan planning organization's SCS, which accommodates each jurisdiction's share of the regional housing need for each income level.

Regional Housing Needs Assessment

A RHNA is mandated by the State Housing Law as part of the periodic process for updating local Housing Elements of general plans. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods.

Communities use the RHNA in land use planning, which includes prioritizing local resource allocation and deciding how to address identified existing and future housing needs resulting from population, employment, and household growth. The RHNA does not necessarily encourage or promote growth; rather, it allows communities to anticipate

growth so that, collectively, the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, and address social equity and fair-share housing needs.

On July 5, 2018, the California Department of Housing and Community Development determined that the San Diego region would need to plan for 171,685 housing units during the *Sixth-Cycle Housing Element* (2021–2029), which SANDAG finalized on July 10, 2020 (SANDAG 2020). As the council of governments for the San Diego region, SANDAG is responsible for developing the methodology for allocating the regional housing need among the region's 19 jurisdictions. The City of Santee was allocated 1,219 RHNA units for the *Sixth-Cycle Housing Element*.

3.13.3.2 Regional

San Diego Association of Governments Regional Comprehensive Plan

The SANDAG *Regional Comprehensive Plan*, adopted in 2004, provides a long-term planning framework for the San Diego region. The *Regional Comprehensive Plan* identified smart growth and sustainable development as important strategies for directing the region's future growth toward compact, mixed-use development in urbanized communities with existing and planned infrastructure, then connecting those communities with a variety of transportation choices.

In December 2021, SANDAG adopted the 2021 Regional Plan, which combines the RTP, SCS, and Regional Comprehensive Plan. The SCS identifies coordinated transportation and land use planning that exceeds the state's target for reducing per-capita greenhouse gas emissions set by the California Air Resources Board. The state-mandated target is a 19% reduction in per-capita greenhouse gas emissions from cars and light-duty trucks, compared with 2005 emissions, by 2035. The 2021 Regional Plan achieves a 20% reduction by 2035 (SANDAG 2021).

The 2021 Regional Plan updates growth forecasts through use of the most recent planning assumptions. It considers currently adopted land use plans, including the City of Santee *General Plan* and other plans from cities in the region and the County of San Diego. SANDAG's Regional Plan changes in response to ongoing land use planning in the City of Santee and other jurisdictions. For example, the City of Santee *General Plan* and other local general plans may change as amendments are initiated by the jurisdiction or landowner applicants. General Plan amendments may result in increases in development densities by amending regional category designations or zoning classifications. Accordingly, SANDAG's latest RTP/SCS forecasts of future development in the San Diego region must be coordinated with each jurisdiction's ongoing land use planning because such planning is not static, as recognized by the need for updates to SANDAG's RTP/SCS every 4 years.

3.13.3.3 Local

City of Santee General Plan

Under the *City of Santee General Plan*, the project site is designated as Park/Open Space, Low-Density Residential, and Planned Development (PD) (City of Santee 2003). The *City of Santee General Plan's Housing Element* is designed to provide the City of Santee with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community (City of Santee 2022). Most of the City of Santee's residentially zoned land has already been developed with a diversity of housing types; however, more than 2,000 acres within the Planned Development (PD) designated areas and the Town Center Specific Plan District remain undeveloped and available for future housing development. The *Housing Element* identifies various

nongovernmental factors, governmental regulations, and environmental issues as constraints to the provision of adequate and affordable housing (City of Santee 2022). These constraints may result in housing that is not affordable for lower- and moderate-income households.

City of San Diego General Plan

Under the *City of San Diego General Plan* (City of San Diego 2015), the southern part of the project site is designated as Open Space. The City of San Diego's RHNA for 2021–2029 is 108,036 housing units. This is the sixth update to the Housing Element and is referred to as the sixth cycle. For the sixth Housing Element cycle, the City of San Diego must identify enough potentially developable land zoned for residential use to meet the City of San Diego's new RHNA capacity/production target, and must develop policies and programs that create opportunities to increase housing production.

On June 16, 2020, the San Diego City Council adopted the *2021–2029 Housing Element* (City of San Diego 2021). The inventory for the *Housing Element* demonstrates that the City of San Diego has enough sites zoned appropriately to meet the City of San Diego's RHNA target of 108,036 new units (SANDAG 2020). There are sufficient properties Citywide that are presumed (according to state requirements) to be suitable for lower-income housing to meet the City of San Diego's RHNA target of 44,880 housing units for very low- and low-income households. The City of San Diego identified capacity to construct 174,678 housing units through the *Adequate Sites Inventory for the Housing Element*; the current Housing Element does not identify the project site as part of the housing inventory (City of San Diego 2021).

3.13.4 Project Impact Analysis

3.13.4.1 Methodology

The potential population and employment increases due to development that could occur under the proposed project were calculated and compared with existing and projected population data to determine potential project impacts. The analysis presented below also discusses whether the proposed project would displace existing housing and residents.

3.13.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the CEQA Guidelines. They provide the basis for determining the significance of population and housing impacts associated with implementation of the proposed project.

Impacts are considered significant if the project would result in any of the following:

1. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure).
2. Displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing elsewhere.

3.13.5 Project Impacts and Mitigation Measures

Threshold 1: *Would the proposed project induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure)?*

Impact Discussion

Construction

The proposed project would include demolition of the existing Carlton Oaks Country Club clubhouse, restaurant/bar, pro shop, 52-room hotel, and surface parking lots in order to construct a mixed-use residential development with a redesigned golf course and resort facility. Proposed project components would include multifamily detached residential units, a professionally designed and publicly accessible golf course and practice area, pro shop, learning center, clubhouse with a restaurant and event space, hotel and associated cottages, and a Project Trail Segment. The number of construction workers employed and working on site would vary over the course of the construction period.

The City of Santee and the City of San Diego have a large pool of construction labor to draw from within commuting distance of the project site. In addition, because of the highly specialized nature of most construction projects, workers are likely to be employed on the job site only for as long as their skills are needed to complete a particular phase of the construction process. For those reasons, it is reasonable to assume that most construction workers would not relocate their households to work on the proposed project. Therefore, construction activities would not induce substantial population growth.

Operation

The proposed project would include development of 86 multifamily detached homes on the western portion of the project site (i.e., Residential West) and 150 multifamily detached homes and 6 single-family homes on the northern portion of the project site (i.e., Residential North). Identification of the project site for residential development is consistent with the *City of Santee General Plan*, which allows residential uses as an accessory use to the primary golf course and country club, and the zoning designation of Planned Development (PD), which allows for residential uses (City of Santee 2003).

In addition to the residential development, the proposed project would also include Carlton Oaks Country Club and Resort, which would involve completely redesigning the existing golf course; a pro shop; learning center; 42 hotel rooms; 10 cottage-style hotel units; and a clubhouse with a restaurant, event space, and other amenities. The residential developments and country club and resort would all be developed within the City of Santee.

As seen in Table 3.13-7, the proposed project would involve development of 242 new dwelling units, representing an increase in population of approximately 686.¹ In the context of the current housing shortage throughout the state and, specifically, the San Diego region, the provision of new housing on the project site would be considered growth-accommodating and a regional benefit. Although the proposed project would necessitate a nominal number of employees for operation of the redeveloped clubhouse and resort, this increase is anticipated to be relatively

¹ A persons-per-household rate, or population factor, of 2.83 was used for the project site because this was the average occupancy number for households in Santee in 2018, according to the City of Santee's *General Plan Housing Element* (City of Santee 2022).

small compared to the current employment opportunities at the existing clubhouse and hotel. As such, implementation of the proposed project would not induce substantial population growth given the size of the labor pool anticipated on the project site.

Table 3.13-7. Land Use and Residential Population Increase

Location	Type of Development	Dwelling Units	Population Factor	Population Total
Residential West	Multifamily detached homes	86	2.83	244
Residential North	Multifamily detached homes	150	2.83	425
Residential North	Single-family homes	6	2.83	17
Total	—	242	—	686

Sources: City of Santee 2022; Lennar Homes 2023.

As shown in Table 3.13-8, SANDAG projected an increase in new residents (6,636) and housing units (4,086) in the City of Santee between 2016 and 2050 (SANDAG 2022a). As explained above, the project site would have approximately 686 residents and 242 housing units and is consistent with its designation under the General Plan and zoning. Accordingly, the proposed project would accommodate the planned growth projected by SANDAG.

Table 3.13-8. Project Share of Projected Growth in Santee

Factor	Project Impact (Number)	SANDAG Projected Growth (2016–2050)	Percent of Growth
Population	686	+6,636	10.3
Housing	242	+4,086	5.9

Source: SANDAG 2022a.

Indirect Growth Inducement

The project site is within a highly urbanized area that is currently served by roadway/access infrastructure. The proposed project would include circulation improvements that may increase roadway capacity; such improvements would facilitate traffic circulation to existing developed areas. The proposed project would not result in the extension or expansion of roadways into previously undeveloped or underdeveloped areas such that surrounding land uses could be encouraged to intensify outside of project improvement areas.

The proposed project would result in an incremental increase in demand for water and wastewater services. It is anticipated that the proposed project would require new points of connection from existing utility lines for domestic water, fire water, and sewer services. All proposed connections to existing utility infrastructure would be sized to adequately serve anticipated project buildout. Similarly, all existing water and sewer facilities that the proposed project would connect to are adequately sized to serve the proposed project without the need to expand (see Section 3.17, Utilities and Service Systems). Furthermore, the project site and surrounding areas are highly urbanized and currently served by utility infrastructure. The proposed project would not extend any utility or service system into undeveloped areas that are currently unserved by utilities. Therefore, the proposed project would not result in indirect growth inducement through the removal of barriers of growth, an extension of utility and service systems, or an encouragement to growth.

Impact Determination

Implementation of the proposed project would not result in substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure). As such, project impacts related to population, housing, and employment growth would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would the proposed project displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing elsewhere?

Impact Discussion

The project site is currently developed with the Carlton Oaks Golf Course clubhouse, a restaurant/bar, pro shop, 52-room hotel, and surface parking lots. There are no existing homes or residential units on the project site; therefore, no existing housing would be affected by implementation of the proposed project. There would be no impacts related to the displacement of substantial numbers of existing housing units or people.

Impact Determination

Implementation of the proposed project would not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing elsewhere.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

No impact would occur.

3.13.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would the proposed project induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure)?

Direct Impacts

The geographic scope for cumulative impacts associated with population and housing is the City of Santee, City of San Diego, and the San Diego County region. In the San Diego region, SANDAG serves as the regional transportation

planning agency. Therefore, SANDAG is responsible for forecasting the region's population growth. A significant cumulative impact related to population growth would occur if the development of cumulative projects would induce a population increase not accommodated by SANDAG's projections for the City of Santee. Of the 37 cumulative projects identified in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, 20 propose residential development in the form of single-family homes, condominiums, apartments, or assisted living/memory care units. All of the residential developments would occur within the City of Santee. It is expected that these cumulative projects would be built in accordance with the *City of Santee General Plan*. This growth would be consistent with Santee's population growth trends, as shown in Table 3.13-1. In addition, as discussed above, it is recognized that there is a current housing shortage throughout the state and, specifically, in the San Diego region. The provision of new housing would represent a regional benefit.

As shown in Table 3.13-8, SANDAG projected more than 6,636 additional residents and 4,086 additional housing units in the City of Santee from 2016 to 2050. The proposed project would include 242 housing units; the cumulative projects would include an additional 3,473 housing units, for a total of 3,715 housing units. Accordingly, the proposed project and cumulative projects would accommodate the planned growth projected by SANDAG and would not be expected to influence population growth in the region. Therefore, cumulative projects would not cause unplanned population growth, and the proposed project's contribution would not be cumulatively considerable. Cumulative impacts would be less than significant.

Indirect Impacts

Cumulative projects in the San Diego region could contribute to an indirect inducement of population growth through the extension of streets or other infrastructure as a result of unplanned development. However, cumulative projects would be required to comply with City of Santee or County of San Diego requirements and would provide new streets or utility improvements, as needed, to serve new populations. The construction of new streets or infrastructure projects would be subject to environmental review, pursuant to CEQA, as well as the goals, policies, and recommendations of applicable planning documents. In general, compliance with federal, state, and local regulations would preclude the indirect population growth impacts associated with the construction of street or infrastructure projects. A significant cumulative impact would not occur with implementation of the proposed project. As discussed under Threshold 1, above, the proposed project would not result in a significant indirect impact associated with substantial population growth. Therefore, the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 2: Would the proposed project contribute to a significant cumulative impact related to the displacement of substantial numbers of existing people or housing units, necessitating the construction of replacement housing elsewhere?

The geographic scope for cumulative impacts associated with population and housing is the City of Santee and the San Diego County region. Cumulative project development in the region would most likely result in the displacement of housing and people. However, given the statewide and regional housing shortage, cumulative projects resulting in the displacement of housing units are likely to replace lost housing with even denser housing. For example, the Laurel Heights condominium project on the cumulative project list (Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis) would result in the loss of 4 residences but would construct 80 condominium units, resulting in a net gain in housing units. As discussed under Threshold 2, above, the proposed project would not result in the displacement of housing or people, and would not contribute incrementally to potential impacts related to the displacement of housing and people. The proposed project's contribution would not be cumulatively considerable.

3.13.7 Summary of Significant Impacts

There would be no significant impacts associated with population and housing.

3.13.8 References

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3.14 Public Services

3.14.1 Overview

This section describes the existing public services, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Carlton Oaks Country Club and Resort Project (project) on public services. The section concludes with an analysis of the proposed project's effect associated with fire facilities, police facilities, school facilities, and other public facilities. Parks are analyzed in Section 3.15, Recreation, of this Environmental Impact Report (EIR).

The applicable fire and police responders were sent a project description and a questionnaire to determine if anything unique to the proposed project would significantly affect the respective provider's ability to provide services and lead to a need to construct new or expanded facilities as part of the proposed project. This section is based on the responses to those questionnaires, and service letters received from the City of Santee Fire Department (SFD), City of San Diego Police Department (SDPD), San Diego County Sheriff's Department (SDSD), Grossmont Union High School District, and Santee Unified School District. The letters are provided as Appendix N. This section is also informed by the Fire Protection Plan (Appendix R1), Wildfire Evacuation Plan (Appendix R2), and findings from other approved planning documents.

3.14.2 Environmental Setting

3.14.2.1 Fire Protection and Paramedic Services

The SFD and City of San Diego Fire-Rescue Department (SDFD) provide fire protection services to the project site. A review of the proposed project by SFD determined that it would be the primary responder for the proposed project (Appendix N). 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. The City of Santee has a signed automatic aid agreement on first-alarm or greater fires with adjacent and nearby fire departments, including SDFD, Alpine Fire Protection District, East County Fire Protection District, El Cajon Fire Department, Lakeside Fire Protection District, La Mesa Fire Department, Lemon Grove Fire Department, and San Miguel Fire Protection District. Each participating member has a mutual aid agreement with the others and participates in the Unified San Diego County Emergency Services Organization to provide paramedic and fire protection services in the event that additional firefighting units are required.

City of Santee Fire Department

The SFD service area covers 16.5 square miles and serves a population of approximately 60,000 people. SFD protects an extremely diverse community consisting of large areas of residential development, commercial/retail centers, office buildings, and industrial parks. Additionally, SFD protects and manages several thousand acres of wildland and wildland-urban interface lands.

The SFD is a full-service department, providing structural fire suppression, wildland fire suppression, hazardous materials operations, public education programs, emergency preparedness planning, and fire code inspection services and permits. It also provides advanced life support, paramedic first response, and paramedic ambulance transport services. SFD has two fire stations and a fire administration building (City of Santee 2024).

Two SFD fire stations are within the project vicinity and would respond in an emergency (Figure 3.14-1, Public Facilities):

- **Station 5** (9130 Carlton Oaks Drive) has two fire engines and a paramedic ambulance and is located 0.5 mile east of the Carlton Oaks Drive entry to the proposed project site.
- **Station 4** (8950 Cottonwood Avenue) has one fire engine, a fire truck, a paramedic ambulance, and a brush engine, and is located 2.7 miles east of the Carlton Oaks Drive entry to the proposed project site.

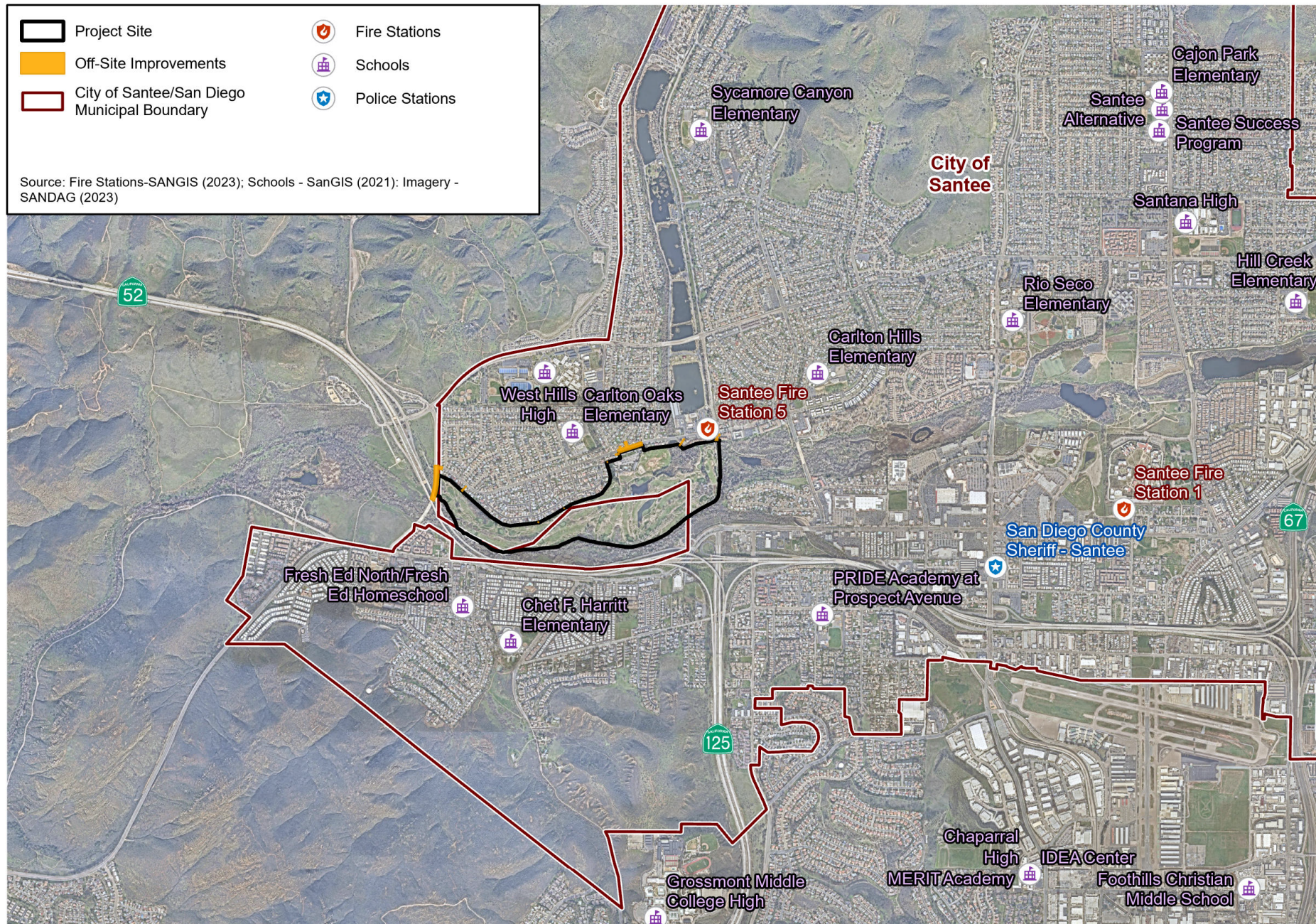
Station 5 would be the primary responding unit for the portion of the project site within the City of Santee.

The City of Santee's *General Plan* states that the goal is 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% of the time (City of Santee 2003). Table 3.14-2 shows the average response times for SFD in 2020.

Table 3.14-1. 2020 Call Response Times for Santee Fire Department

Incident Type	Travel Time	Response Time	First-In Units	All Unit Responses
Fire, Explosion	05:36	06:56	165	517
Good Intent Call	06:09	07:27	390	400
Hazardous Condition	06:05	06:55	6	6
Rescue, Emergency Medical Services	04:30	05:44	4,719	9,304
Service Call	05:217	06:346	179	185
Special or Another Incident Type	05:99	07:23	64	172
Total	04:39	05:54	5,523	10,584

Source: Appendix N.



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City of San Diego Fire-Rescue Department

With a service area covering 343 square miles, SDFD is responsible for 17 miles of coastline extending 3 miles offshore and serves a population of approximately 1,419,845 people. SDFD has 52 fire stations and 9 permanent lifeguard stations (31 seasonal stations during peak period) and employs approximately 949 uniformed personnel, 98 permanent uniformed lifeguard personnel, and 246 civilian personnel, for a total of 1,293 personnel (SDFD 2023).

Four SDFD fire stations are within the project vicinity and would respond in an emergency (Figure 3.14-1, Public Facilities):

- **Station 34** (6565 Cowles Mountain Boulevard) has one fire engine and one brush engine, and is located approximately 3 miles south of the project site.
- **Station 31** (6002 Camino Rico) has one fire engine and one paramedic vehicle, and is located approximately 4.8 miles southwest of the project site.
- **Station 39** (4949 La Cuenta Drive) has one fire engine and one paramedic vehicle, and is located approximately 5.4 miles southwest of the project site.
- **Station 44** (10011 Black Mountain Road) has one fire engine, one battalion chief vehicle, and one fire truck, and is located approximately 7.7 miles northwest of the project site.

Station 34 would be the primary responding unit for the portion of the project site within the City of San Diego.

According to SDFD, the difference between a *fire engine* and a *fire truck* is that an engine is the primary piece of fire apparatus for carrying personnel, water, hoses, and pumping equipment, whereas trucks carry equipment and ladders, but do not have water tanks; however, they can be adapted to provide water streams from 600–1,500 gallons per minute with the assistance of an engine and a fire hydrant. *Paramedic units* are outfitted with specialized rescue equipment, such as Jaws of Life, a gurney, bandages, medication, defibrillators, and oxygen. The ambulance is equipped for advanced life support. *Brush engines* are pumper units used on grass fires and are specially adapted to fire fighting in rough (i.e., wildland) terrain, where access is a problem, and fire hydrants are few or non-existent. *Brush rigs* carry 600–1,500 gallons of water and are designed for off-road areas and brush fire fighting (SDFD 2024).

According to the City of San Diego's *General Plan – Public Facilities, Services, and Safety Element* (City of San Diego 2024), for medical patients and small fires, the first-due unit should arrive within 7.5 minutes, 90% time of the time, from the receipt of the 911 call in fire dispatch. For serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911 call receipt in fire dispatch, 90% of the time (City of San Diego 2024).

3.14.2.2 Police Protection

The SDSD and SDPD would both provide police protection services to the project site.

City of Santee (San Diego Sheriff's Department)

SDSD provides law enforcement services for the City of Santee. SDSD services include emergency services, crime prevention programs, patrol and traffic services, parking enforcement, noise complaints/barking dogs, crime analysis, investigations, and narcotics enforcement. The proposed project within the City of Santee would be served by SDSD's Santee Station (8811 Cuyamaca Street), which is approximately 2 miles from the project site. The Santee

Station is responsible for a 16-square-mile area and a population of approximately 60,000 residents. The Santee Sheriff's Station (Figure 3.14-1, Public Facilities) employs approximately 60 deputies responsible for patrol and traffic services, community oriented policing and problem solving, criminal investigations, and crime prevention education (SDSD 2025). Vehicle staffing for patrols normally consists of one deputy per vehicle. The Santee Station also has access to all other specialized department services and resources. A Sheriff's storefront is also operated in the Santee Town Center near the San Diego Trolley line and San Diego Christian College.

SDSD has a goal of providing one patrol person per 10,000 residents (County of San Diego 2011). No response time standard has been adopted by SDSD because deputies respond to calls for service while they are already out on patrol, and the response time will vary depending on the deputy's current location, their availability (e.g., they may already be working on a higher-priority call), and the type of call (e.g., a priority call may be a "cover call," requiring that two deputies respond, and the call will not be dispatched until two deputies are available) (County of San Diego 2011).

City of San Diego Police Department

SDPD would provide law enforcement services for the portion of the project site in the City of San Diego. The proposed project is in SDPD's Eastern Division (9225 Aero Drive), which is approximately 10 miles from the project site.

The quality of SDPD police protection services is evaluated by the average response time to an emergency call. Table 3.14-2 shows SDPD's standards for determining adequate response times and recent actual response times. There is also a citywide goal for SDPD to have 1.48 officers per 1,000 residents. As of February 2025, SDPD has 75 sworn officers in the Eastern Division and a ratio of 1.34 officers per 1,000 residents based on a 2024 estimated residential population of 1,388,996 (Appendix N).

Table 3.14-2. Call Priority Response Times for San Diego Police Department

Call Type	General Plan Average Response Time Standards	Actual Response Types in 2016 (minutes)
Priority E: Imminent threat to life	Within 7 minutes	6.6 minutes
Priority 1: Serious crimes in progress	Within 14 minutes	31.5 minutes
Priority 2: Less serious, non-life-threatening crimes	Within 27 minutes	102.8 minutes
Priority 3: Minor crimes/non-urgent requests	Within 80 minutes	153.1 minutes
Priority 4: Minor requests for police services	Within 90 minutes	102.1 minutes

Source: City of San Diego 2024; Appendix N.

3.14.2.3 Public Schools

The project site is within the boundary of the Santee School District and the Grossmont Union High School District. The location of these districts and schools within the project site vicinity are shown on Figure 3.14-1, Public Facilities. Six public schools are within 2 miles of the project site. Santee School District schools within the project vicinity, beginning with the closest, include Carlton Oaks Elementary School (0.15 miles to the north), Chet F Harritt Elementary School (0.28 miles to the south), Carlton Hills Elementary School (0.42 miles to the northeast), Pride Academy at Prospect Avenue Elementary School (0.63 miles to the southeast), Sycamore Canyon School (1.28 miles to the north), and Rio Seco Elementary School (1.26 miles to the northeast).

Other public schools within 2 miles of the project site are within the boundary of the Grossmont Union High School District and include West Hills High School (0.41 miles to the north) and Chaparral High School (1.97 miles to the southeast). Existing student enrollment of each school district is identified in Table 3.14-3.

Table 3.14-3. School Enrollment for Districts Serving the Project Site

District	Number of Schools in District	Existing Enrollment (2022–2023)
Santee School	10	6,151
Grossmont Union High	17	21,815

Sources: CDE 2023a, 2023b.

3.14.2.4 Library Facilities

The City of Santee receives its library services from the San Diego County Library (SDCL) system, which serves more than a million residents in San Diego County’s unincorporated communities. In 1996, the Board of Supervisors adopted recommended Standards of Library Service. The minimum space service goal for the SDCL system is 0.5 square feet per capita (County of San Diego 2011). Library services are provided to the City of Santee by the Santee Branch, a 7,500-square-foot facility located at 9225 Carlton Hills Boulevard. The Santee Branch is approximately 0.7 miles east of the project site.

3.14.2.5 Parks

Refer to Section 3.15, Recreation, for a discussion of on-site and off-site park and recreational facilities and services.

3.14.3 Applicable Laws and Regulations

3.14.3.1 State

California Code of Regulations Title 24, Parts 2 and 9, California Building Code

Title 24, Part 9 of the California Building Code (CBC) contains fire safety–related building standards referenced in other parts of Title 24. This code includes portions of the 2021 International Fire Code (IFC) by the International Code Council. Title 24 requires building according to fire safety standards for all new construction, including new buildings, additions, alterations, and, in nonresidential buildings, repairs.

California Health and Safety Code (Section 13000 et seq.)

State fire regulations are set forth in California Health and Safety Code Section 13000 et seq., which include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices (e.g., extinguishers, smoke alarms), high-rise building and childcare facility standards, and fire suppression training. The state Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

California Department of Education

The California Department of Education (CDE) administers California's public education system at the state level; the state Board of Education, by statute, is the governing and policy-determining body of the CDE. The Board adopts rules and regulations for the government of the state's public schools. It also adopts curriculum frameworks in core subject-matter areas, approves academic standards for content and student performance in the core curriculum areas, and adopts tests for the Standardized Testing and Reporting program and the California High School Exit Examination.

Assembly Bill 16

In 2002, Assembly Bill (AB) 16 created the Critically Overcrowded School Facilities program, which supplements the new construction provisions within the School Facilities Program (SFP). SFP provides state funding assistance for two major types of facility construction projects: new construction, and modernization. The Critically Overcrowded School Facilities program allows school districts with critically overcrowded school facilities, as determined by the CDE, to apply for new construction projects in advance of meeting all SFP new construction program requirements. Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply California Public Schools Accountability Act of 1999.

Senate Bill 50 (Statutes of 1998), State School Funding, Education Code Section 17620

California Education Code 17620 establishes the authority of any school district to levy a fee, charge, dedication, or other requirements against any development within the school district for the purposes of funding the construction of school facilities, as long as the district can show justification for the fees. Senate Bill (SB) 50, adopted in 1998, limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development. It also authorizes school districts to levy statutory developer fees at levels higher than previously allowed and according to new rules.

3.14.3.2 Local

City of Santee's General Plan

Land Use Element

The City of Santee's *General Plan – Land Use Element* (City of Santee 2003) is intended to promote development of a well-balanced and functional mix of residential, commercial, industrial, open space, recreational, and civic uses that create and maintain a high-quality environment. The *Land Use Element* contains goals, policies, and programs concerning land use. The following objective and policy pertain to the provision of public services:

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

The purpose of the City of Santee's *General Plan – Safety Element* (City of Santee 2003) 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. It also serves to inform individuals, firms, and public agencies of the City of Santee's policies regarding appropriate levels of public services, such as police and fire protection. Objectives and policies relevant to the proposed project include the following (City of Santee 2003):

Objective 4.0: Minimize injuries, life of loss 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 4.8: Encourage and support the delivery of a high level of emergency services through cooperation with other agencies and use of available financial opportunities.

Policy 4.10: Encourage the continued development, implementation and public awareness of fire prevention programs.

Policy 4.11: In order to minimize fire hazards, the Santee Fire 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 resulting 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.

Santee Municipal Code, Chapter 12.30

Santee Municipal Code, Chapter 12.30 (Development Impact Fees), establishes provisions for assessing and collecting fees as a condition of approval of a final map or as a condition of issuing a building permit. New development in the City of Santee that would require the construction of new public facilities—including, without limitation, drainage improvements, traffic improvements, traffic signals, public park facilities,

community facilities and other public improvements, public services, and community amenities—is required to pay the costs of constructing the public facilities reasonably related to the impacts from the new development.

City of San Diego's General Plan

The City of San Diego's *General Plan* contains a *Public Facilities, Services and Safety Element* (City of San Diego 2024) that is intended to provide the public facilities and services needed to serve the people that live in and visit San Diego. This element provides policies for financing, prioritization, developer, and funding responsibilities for public facilities in the City of San Diego.

City of San Diego Municipal Code, Section 142.0640

The City of San Diego requires payment of Development Impact Fees (DIFs) to collect a proportional fair share cost of capital improvements needed to offset impacts from the development (SDMC Section 142.0640). DIFs are based on community-specific financing plans completed when Community Plans are updated. Financing plans were formerly known as *Public Facilities and Financing Plans*, and are now referred to as *Impact Fee Studies*.

3.14.4 Project Impact Analysis

3.14.4.1 Methodology

This section analyzes the proposed project's impacts on public services by determining if physical improvements to existing public facilities would be required. If so, then the analysis determines whether the physical construction would result in a significant impact on the environment and if mitigation would be necessary. Parks are analyzed in Section 3.15, Recreation, of this EIR. Public services impacts were determined by comparing the proposed project with the objectives of the City of Santee's *General Plan*, specifically the *Safety* and *Land Use Elements*, as well as assessing the proposed project's demand on existing public services. Will-serve letters from public service agencies were obtained to confirm the agencies' availability to serve the proposed project.

Project Design Features

The project proponent would implement the following project design features (PDFs) to help reduce impacts related to public services (the full text of these PDFs can be found in Chapter 2, Project Description):

PDF-11: Fire Protection Measures

PDF-12A: Traffic Control Plan

3.14.4.2 Thresholds of Significance

The following significance criteria are based on State CEQA Guidelines Appendix G and the City of San Diego's CEQA Significance Determination Thresholds provide the basis for determining significance of impacts associated with public services that may result from implementation of the proposed project.

Impacts would be considered significant if the project were to result in any of the following:

1. **Fire Protection:** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or 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.
2. **Police Protection:** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or 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 police protection.
3. **Schools:** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.
4. **Other Public Facilities – Libraries:** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for libraries.

Parks are analyzed in Section 3.15, Recreation, of this EIR.

3.14.5 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of 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?

Impact Discussion

Construction

The proposed project would involve the construction of the residential development, golf course, clubhouse, hotel, and trail segments. The project would provide two emergency access roads, one through the existing Vista del Verde condominiums in the northeastern corner of the project site, and the other off West Hills Parkway in the northwestern corner of the project site. The proposed project also would involve the construction of off-site improvements, including the widening of West Hills Parkway from Carlton Oaks Drive southerly to the northerly end of the bridge on West Hills Parkway, the extension of Fanita Parkway, and other utility improvements. Construction of the proposed project, including emergency access roads and off-site improvements, are analyzed throughout this EIR. Construction of the proposed project is anticipated to occur over an approximately 45-month period. During construction, there could be a need to respond to the project site for construction-related injuries or accidental fire.

Fire protection and emergency response would be provided by SFD and SDFD. The City of Santee and the City of San Diego entered into an automatic aid agreement effective December 3, 1984, which allows SFD and SDFD to provide services within each other's jurisdictional limits (Appendix N). SFD Fire Station 5, 0.04 miles north of the project site, would be the primary responder for the project site. SFD Fire Station 4, approximately 1.7 miles east

of the project site, and SDFD Station 34, approximately 5 miles south of the project site, also would provide fire protection services to project site, as needed. The City of Santee's *General Plan* (City of Santee 2003) states that the goal is 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% of the time. Secondary to response time is the number of personnel necessary to perform critical tasks required to safely mitigate emergencies.

SFD and SDFD already provide fire protection and emergency response services, including response to medical emergencies, to the existing golf course and country club facilities (including the hotel) on the project site. Based on the SFD service letter, SFD had an average response time of 5 minutes and 54 seconds in 2020, meeting the City of Santee's goal (Appendix N). Response travel time from Station 5 is calculated at roughly 1 minutes, 3 seconds, to the eastern entrance of the project site and 2 minutes, 47 seconds, to the farthest lot in the northwestern corner of the project site. The second engine to the site is estimated to arrive within approximately 6 minutes, 36 seconds, travel time. All response calculations are based on an average response speed of 35 miles per hour, which is consistent with nationally recognized National Fire Protection Association 1710. In this context, *response time* is the time from when the unit is notified until the unit arrives on scene. Response times do not include "dispatch time." Based on these calculations, the project would comply with the City of Santee's response time standards from the existing fire stations. Additionally, fire services are currently provided to the project site that meet the City of Santee's goal (Appendix N).

As required by standard fire code regulations, before any combustible materials can be brought onto the site for construction, the proposed project must have all underground utilities in place; fire hydrants operational; water mains, curbs, gutters, sidewalks, and an approved all-weather roadway in place; and interim fuel-modification zones established and approved. These measures, along with other fire protection measures described in Project Design Feature (PDF)-11, Fire Protection Measures (refer to Chapter 2, Project Description, for the full text of the PDFs), would minimize any fire risk from the construction of the project. As described in PDF-12A, Traffic Control Plan, a traffic control plan will be prepared and implemented for the construction phase. Pursuant to PDF-12A, Traffic Control Plan, all large construction vehicles entering and exiting the site would be guided by personnel using signs and flags to direct traffic. The traffic control plan would include procedures that would be followed to properly and safely close lanes and redirect traffic, if necessary, during construction. Adherence to the traffic control plan would ensure that emergency response vehicles could safely access the project site and the vicinity and that project construction would not conflict with established emergency evacuation routes.

These project measures will reduce fire risk and services during the construction of the proposed project, and no temporary, new, or physically altered governmental facilities related to fire and emergency service would be required. Impacts would be less than significant, and no mitigation would be required.

Operation

Operation of the proposed project would generate additional residents, resort guests, retail visitors, and recreational visitors, which would potentially result in increased demand for fire protection services from SFD and SDFD. A review of the proposed project by SFD determined that it would be the primary responder for the proposed project (Appendix N). The project would provide two emergency access roads, one through the existing Vista del Verde condominiums in the northeastern corner of the project site, and the other off West Hills Parkway in the northwestern corner of the project site.

In the City of Santee, response time is the primary standard used to determine adequate levels of service. An increase in demand and a larger service area may result in response times to emergencies exceeding established response time goals. Emergency call volumes related to typical projects, such as new residential developments, can be reliably estimated based on the historical per-capita call volume from a particular fire jurisdiction. The SFD documented 5,791 total incidents for 2019 (Appendix R1), generated by a citywide total population of approximately 60,000 persons. The City of Santee's per-capita annual call volume is approximately 100 calls per 1,000 persons. The project's estimated population is calculated to generate up to 44 calls per year (0.12 calls per day). The population includes 686 residents for 242 residential dwelling units and approximately 200 guests and employees of the hotel and golf course. The total on-site population is calculated at 442 persons (Appendix R1).

Service-level requirements, absent additional resources, would not be expected to be significantly affected with the increase of 44 calls per year, or approximately 0.12 calls per day, if the project were serviced from one or both of the existing SFD stations. SFD currently responds to just over 16 calls per day, on average, in its entire service area, or roughly eight calls per day per fire station. For reference, a station that responds to five calls per day is considered average, and 10 calls per day is considered busy (Appendix R1). The project's anticipated contribution of 0.12 calls per day is considered minimal. Therefore, there is capacity at the existing SFD stations to maintain acceptable service ratios.

As noted above, response travel time from Station 5 is calculated at roughly 1 minute, 3 seconds, to the eastern entrance of the project site and 2 minutes, 47 seconds, to the farthest lot, in the northwestern corner. Based on these calculations, the project would comply with the City of Santee's response time standards from the existing fire stations.

The proposed project would be constructed in accordance with CBC Title 24, Article 9, which includes the 2022 California Fire Code and the International Code Council's 2021 IFC, all of which would ensure that on-site controls were in place to limit the extent of the damage from any potential fire. Additionally, a Fire Protection Plan was developed for the proposed project (Appendix R1) to provide fire-planning guidance and protective measures for fire (i.e., specific features related to roadway access, premises identification, gates, water supply, fire sprinklers, ignition-resistant construction, vegetation management, and fuel-modification zones) to reduce fire risk and demand for fire protection services. Section 3.18, Wildfire, provides additional information about how the proposed project would reduce wildfire impacts and create an ignition-resistant community. Additionally, buildings proposed as part of the project would not be taller than two stories and would not require special equipment for fire protection. As a result, the project would not generate a significant direct impact on fire protection.

The need for new or physically altered fire protection facilities would not be expected as a result of the proposed project, in order to maintain acceptable response times for fire and emergency service. Impacts would be less than significant, and no mitigation would be required.

Impact Determination

The provision of fire department personnel is funded through the City of Santee's general fund, revenues for which come largely from property taxes. Service demand would be likely to increase with implementation of the project, but it is anticipated that expanded fire protection services would be funded, as necessary, from increased property taxes and other revenues to the City of Santee resulting from the project. Implementation of the proposed project would not result in the need for new or physically altered fire protection 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 services. Impacts would be less than significant, and no mitigation would be required.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of 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 police protection?

Impact Discussion

Construction

Project construction activities would involve standard construction equipment, such as dozers, excavators, loaders, backhoes, rollers, compactors, and scrapers. During the construction period, there could be safety concerns regarding such issues as loitering at the construction site, theft, and burglary of construction equipment and materials left unattended. In the event of any criminal activity, local law enforcement services would respond to the project site.

As stated in Section 3.14.2, Environmental Setting, the first responders to any police protection requests at the project site would be provided from either the SDSD Santee Station or the SDPD Eastern Division Station. SDSD staffing goals and facility plans are based on population: generally, SDSD has a goal of providing one patrol position per 10,000 residents. As noted above, SDSD does not have adopted travel time standards. The Santee Station currently provides approximately 60 deputy positions and serves approximately 60,000 people. The existing number of patrol officers currently meets the SDSD goal of providing 1 patrol position per 10,000 residents.

During construction, the proposed project would not be expected to increase the population in the City of Santee. The City of Santee and City of San Diego have a large pool of construction labor from which to draw from within commuting distance of the project site. As such, construction of the proposed project would not be expected to affect its staffing ratio goal.

As of February 2025, SDPD had a staffing ratio of 1.34 officers per 1,000 residents, based on a 2024 residential population of 1,388,996, with a goal of 1.48 officers per 1,000 residents. Although the SDPD is not currently meeting its target staffing ratio goals, most of the project construction would occur within the City of Santee's jurisdiction, which is currently meeting its staffing ratio goal of providing 1 patrol position per 10,000 residents.

Because project construction would be temporary and SDSD and SDPD are accustomed to providing services to the project site, construction of the proposed project would not be expected to require new or physically altered governmental facilities related to police protection. Impacts would be less than significant, and no mitigation would be required.

Operation

Operation of the proposed project would result in additional residents, resort guests, retail visitors, and recreational visitors to the project site. The proposed project would result in the addition of approximately 686 residents¹ for 242 residential dwelling units and approximately 200 guests and employees of the hotel and golf course, for a total of 886 persons. Population growth associated with the proposed project would result in a need for increased police services.

The residential and resort components of the proposed project would be within the City of Santee and served by SDSD under contract with the City of Santee. As discussed above, SDSD does not have adopted travel time standards, but does have a goal of providing one patrol position per 10,000 residents. The Santee Station currently provides approximately 60 deputy positions and serves approximately 60,000 people. Even with implementation of the proposed project and the estimated increase in population of 686 residents, the number of existing SDSD patrol officers would continue to meet the SDSD's staffing goal.

Because all of the structures and roads proposed for the project would be within the City of Santee, most calls for police service would be expected to originate from the portion of the project within the City of Santee. In 2023, the SDSD Santee Station documented 13,873 calls for service generated by a citywide total of approximately 60,000 persons (SDSD 2023). Based on this, the City of Santee's per-capita annual call volume is approximately 239 calls per 1,000 persons. The project's estimated population of 886 is calculated to generate up to 211 calls per year (0.58 call per day). The SDSD Santee Station currently responds to approximately 38 calls per day. The project's anticipated contribution of 0.58 call per day is not expected to significantly affect service-level requirements nor necessitate the provision of new or physically altered police protection facilities.

Approximately 64.2 acres of the golf course are within the City of San Diego and would be served by SDPD. Although the SDPD is not currently meeting its target staffing ratio goals, operation of the redesigned golf course would not be expected to increase police service demand above the existing demand for the currently operating golf course. Furthermore, the majority of the calls are expected to originate within the City of Santee, where the residential and resort components and projects roads are located.

As recommended by SDPD in its will-serve letter (Appendix N), the proposed project would go through a Crime Prevention Through Environmental Design review to ensure project consistency. The project would be subject to applicable DIFs for public-facility financing, in accordance with City of Santee Municipal Code Chapter 12.30, which would include fees for police facilities funding. Impacts would be less than significant, and no mitigation would be required.

Impact Determination

The provision of Sheriff's Department personnel is funded through the City of Santee's general fund, revenues for which come largely from property taxes. Service demand would be likely to increase with implementation of the project, but it is anticipated that expanded police protection services would be funded, as necessary, from increased property taxes and other revenues to the City of Santee resulting from the project. The law enforcement services information provided to the project by the City of Santee states that physical facilities are adequate and that no new staff would be required to serve the project. As a result, implementation of the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police

¹ Population increase is based on the City of Santee's forecasted persons per household rate (2.83). Increase in dwelling units multiplied by average persons per household.

protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection. Impacts would be less than significant, and no mitigation would be required.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: Would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Impact Discussion

Construction

The need for new or physically altered school facilities to maintain acceptable service ratios or other performance objectives for schools would only potentially occur if a project increased enrollment at existing schools beyond their capacity. However, such actions would be dependent on population increase. Construction of the proposed project would be temporary and would not result in increased student enrollment. Therefore, construction of the proposed project would not increase demand on school facilities, and no new or altered facilities would be needed as a result of the construction of the proposed project. There would be no construction impact, and no mitigation would be required.

Operation

Operation of the proposed project would include 242 new dwelling units and result in student population growth, thus increasing the need for school facilities. Student generation rates represent the average number of students per home and are used to determine the number of potential students that could be generated by residential development. According to student generation rates used for the Santee School District, the proposed project could generate approximately 52 new TK-8 students, and 33 high school students (see Table 3.14-4), for a total of 85 students.

Table 3.14-4. Student Generation Rates

Unit Type	Number of Units	Santee School District (TK-8)	Grossmont Union High School District	Total Number of Students
Detached Multifamily	236	0.20900	0.137	82
Detached Single Family	7	0.33440	0.146	3
	243	52	33	85

Sources: SSD 2017; GUHSD 2016.

The project site falls within two school district boundaries: Santee School District and Grossmont Union High School District. The residents of the proposed project site would likely send students to Carlton Oaks Elementary, which serves students in grades TK through 8th grade, and West Hills High School. The location of these districts and schools within the project site vicinity are shown on Figure 3.14-1, Public Facilities. Based on input from the Santee School District (Appendix N), although Carlton Oaks School may not have capacity to serve new students generated as a result of the proposed project, there is sufficient capacity throughout the Santee School District to accommodate new students (Appendix N). The Santee School District reserves the right to assign students to schools throughout the Santee School District based on various factors, including, but not limited to, space availability (Appendix N). Based on a comparison of student enrollment data from school year 2019/2020 and 2023/2024 all schools in the Santee School District have reduced enrollment for the 2023/2024 school year, with the exception of Carlton Oaks Elementary and PRIDE Academy, which have slightly increased enrollment (California Department of Education 2025). In any event, schools are funded through the payment of DIFs pursuant to SB 50 (Chapter 407, Statutes of 1998)/Government Code Section 65995, which would be paid prior to issuance of building permits. According to SB 50, payment of developer impact fees constitutes adequate mitigation related to impacts to school facilities.

Under SB 50, a school district may levy impact fees on new development in order to mitigate potential impacts of the development on school facilities, and payment of these fees is considered

full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities (California Government Code Section 65995).

There is an option for entering into various alternative mitigation agreements to ensure the timely construction of school facilities to house students from new residential development.

In lieu of an alternative mitigation agreement, the proposed project would be required to pay state-mandated school facilities fees to contribute to a fair share amount to help maintain adequate school facilities and levels of service. This would ensure that there would be sufficient facilities to serve the proposed project's additional students. However, the provision of schools is the responsibility of the school district. SB 50 provides that the statutory fees found in the Government and Education Codes are the exclusive means of considering and mitigating for school impacts. Imposition of the statutory fees constitutes full and complete mitigation (Government Code Section 65995[b]).

The proposed project would either pay the state-mandated school fees or enter into a School Mitigation Agreement(s) to ensure that schools are built as population increases during the phased development. Development of a new school would be undertaken by the school district, and an environmental document would be prepared at such time. Student generation rates represent the average number of students per home and are used to determine the number of potential students that could be generated by residential development. Both school districts have established school impact mitigation fees to address the facility impacts created by residential and commercial development. The districts use these fees to pay for facility expansion and upgrades needed to serve new students. These fees would be collected during the plan-check process. Payment of mandatory school impact fees, in accordance with SB 50, would mitigate potential impacts to school facilities from the proposed project. Impacts would be less than significant, and no mitigation would be required.

Impact Determination

Implementation of the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Impacts would be less than significant, and no mitigation would be required.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: Would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for libraries?

Impact Discussion

Construction

Construction of the proposed project would involve the construction of the residential development, golf course, clubhouse, hotel, and trail segments. The need for new or physically altered government facilities to maintain acceptable service ratios or other performance objectives would only potentially occur if the construction of a project were to increase the local population. During construction of the proposed project, construction employees would only be at the site temporarily and would not require governmental facilities. Therefore, the proposed project would not increase demand for governmental facilities, and no new or altered facilities would be needed as a result of construction activities. There would be no construction impact, and no mitigation would be required.

Operation

The minimum space service goal for SDCL is 0.5 square feet per capita. Based on the 2022 estimated population of 59,051 residents (U.S. Census Bureau 2022), the library facility requirement for the City of Santee is approximately 29,526 square feet. The Santee Branch, which is approximately 7,500 square feet, would serve the project site. The current facility does not meet the SDCL service goal. Currently, the City of Santee is deficient in library facility service–space based on the SDCL service goal.

The project would incrementally increase the existing library space deficit. The City of Santee requires payment of DIFs to collect a proportional fair share cost of capital improvements needed to offset the impact of the development (Santee Municipal Code Chapter 12.30). Facility types that are eligible for DIF funding include transportation, storm drains, parks and recreation, and other public services. However, the required DIF (Santee Municipal Code Chapter 12.30) payments do not go toward funding the construction of libraries.

According to the *Adopted Operational Plan Fiscal Years 2022/23 and 2023/24*, for the County of San Diego, an expansion of the Santee Branch is planned, including the design and construction of a new and larger facility (approximately 24,000 square feet) (County of San Diego 2022). The expanded off-site facility would be subject to separate environmental review, prior to its approval. Therefore, the proposed project would not result in significant impacts associated with the provision of new or physically altered government facilities. Impacts would be less than significant, and no mitigation would be required.

Impact Determination

Implementation of the proposed project would not result in substantial adverse physical impacts associated with the provision of 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. Impacts would be less than significant, and no mitigation would be required.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.14.6 Cumulative Impacts and Mitigation Measures

Development of the proposed project would result in the impacts on public services identified in Section 3.14.4, Project Impact Analysis, and would contribute to cumulative public service impacts in the area. The cumulative project site is described below and include the projects identified in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis.

Cumulative Threshold 1: Would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of 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?

The geographic context for the analysis of cumulative impacts in regard to fire protection services is the Cities of Santee and San Diego near the project site, where facilities that may serve the project site are located. A significant cumulative impact would occur if growth associated with cumulative projects would outpace the SFD's and SDFD's abilities to expand and serve new development, resulting in adverse effects from increased response times, physical deterioration of existing facilities, or lack of funding for the development of future facilities. Population increases in the Cities of Santee and San Diego can be anticipated to continue, even without the proposed project. The City of Santee's population shrunk nearly 2% from 2020 through 2022 (U.S. Census Bureau 2022). However, population increases from cumulative project development could, over time, affect both departments' capacities to provide response within the response time standard. As both cities continue to grow, additional fire-response resources would become necessary.

As additional development occurs, increases in the demand for fire protection would likely require improvements to fire protection services. However, these and other cumulative projects would undergo discretionary review by

local agencies and would be required to conform with applicable adopted land use plans, which are used as the basis to plan for adequate fire protection services. The Fanita Ranch Project would construct a new fire station to serve the additional 7,974 to 8,145 residents expected as a result of that development and ensure adequate response times. In addition, fire protection facilities would be provided for new development through property taxes, developer agreements, and other general fund revenue sources. The project's fair share contributions to fire resources through building fees and ongoing fair share allocations, combined with the same contributions from future development in the area, would result in funding that would be used for enhancing response capabilities and, at the least, maintaining the current standards for firefighting and emergency response. As noted above, project-related property taxes would benefit the local fire agency. Paying these fees, meeting the design requirements, and implementing fire protective measures in the Fire Protection Plan would result in less than significant cumulative impacts to fire protection, and no mitigation would be required.

Cumulative Threshold 2: Would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of 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 police protection?

The geographic context for the analysis of cumulative demand for police protection services and facilities is the SDSD and SDPD service areas, which include facilities in the Cities of Santee and San Diego that would serve the project site. A significant cumulative impact related to adverse effects on existing police protection services would occur if the development of future cumulative projects were to result in adverse effects on the SDSD and SDPD from increased response times, physical deterioration of existing facilities, or lack of funding for the development of future facilities. As additional development occurs in the county, increases in the demand for police protection services would most likely require improvements to police protection facilities. However, these and other cumulative projects would undergo discretionary review by local agencies and be required to conform with applicable adopted land use plans, which are used as the basis to plan for adequate police protection services. In addition, police protection facilities would be provided for new development through property taxes, developer agreements, and other general fund revenue sources. Therefore, a significant cumulative impact would not occur with implementation of the proposed project, and no mitigation would be required.

Cumulative Threshold 3: Would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

The geographic context for the analysis of cumulative impacts in regard to schools is the Santee School District and Grossmont Union High School District service area boundaries, which provide school services for school-aged children in the City of Santee and the region. A significant cumulative impact related to adverse effects on school services would occur if future cumulative projects would generate an increase in population that would exceed the Santee School District's and Grossmont Union High School District's educational standards and result in degraded school facilities and services. Increased housing generates increased demand for schools, which could result in the need for new or expanded schools. School projects would be subject to CEQA, which would require them to mitigate significant impacts on the environment. In addition, future developments would be required to pay school impact mitigation fees, in accordance with SB 50, for facility expansion and upgrades needed to serve new students. Therefore, a significant cumulative impact would not occur with implementation of the proposed project, and no mitigation would be required.

Cumulative Threshold 4: Would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for libraries?

The geographic context for the analysis of cumulative impacts in regard to library services is defined as the service area for the SDCL system, which is the County of San Diego. The County of San Diego identifies that more than half of the libraries, including the Santee Branch, are considered to be in a space deficit. Therefore, a potentially significant impact related to adverse effects on library services would occur if future cumulative projects were to result in adverse effects on the SDCL facilities from physical deterioration of existing facilities or lack of funding for the development of future facilities consistently with the County of San Diego's library space goal. The County of San Diego plans for expansion and growth of its library system, based on the adopted planning documents. According to the *Adopted Operational Plan Fiscal Years 2022/23 and 2023/24*, an expansion of the Santee Branch is planned, including the design and construction of a new and larger facility (approximately 24,000 square feet) (County of San Diego 2022). Therefore, cumulative projects would not result in a potentially significant cumulative impact, even though the proposed project would contribute to the need for additional library space to serve the residents it would generate. Once a site is identified and plans are prepared, this facility would undergo its own separate environmental evaluation. Any identified significant impacts would be required to be mitigated to the extent feasible. Therefore, the proposed project's contribution would not be cumulatively considerable, and no mitigation would be required.

3.14.7 Summary of Significant Impacts

There would be no significant impacts associated with public services.

3.14.8 References

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3.15 Recreation

3.15.1 Overview

This section describes the existing recreational facilities that could be adversely affected by the proposed Carlton Oaks Country Club and Resort Project (project), and the applicable laws and regulations related to recreational facilities. The section concludes with an analysis of the proposed project's effects associated with existing recreational amenities and new or expanded recreational facilities.

3.15.2 Environmental Setting

3.15.2.1 Parks and Recreational Facilities

Local Recreational Facilities

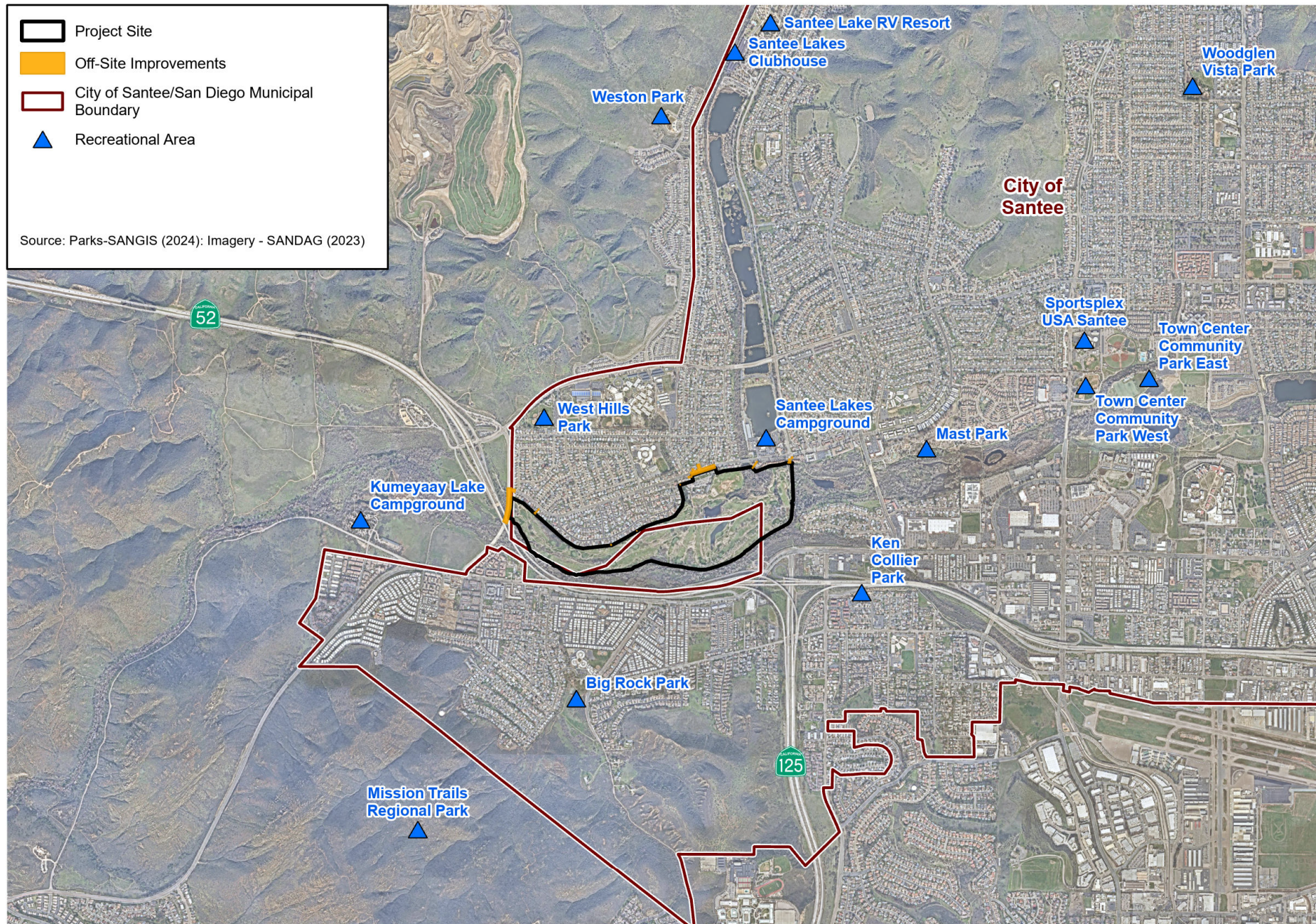
The project site is in an area that contains several recreational facilities, including the existing Carlton Oaks Golf Course, parks, trails, preserves, and other amenities that provide recreational opportunities to the community. Neighborhood parks within the project site's vicinity are listed in Table 3.15-1. The parks included in the table are in the City of Santee; parks in the City of San Diego are separated from the project site by Scripps Ranch, as shown in Figure 3.15-1, Recreational Facilities.

Table 3.15-1. Recreational Facilities Within the Project Site Vicinity

Park/Facility Name	Park Type	Location	Existing Acreage
Big Rock Park	Neighborhood Park	8125 Arlette Street	5.77
Deputy Ken Collier Park	Neighborhood Park	9206 Via De Cristina	0.57
Goodan Ranch	Regional Park	16281 Sycamore Canyon Road	80.25
Mast Park	Community Park	9125 Carlton Hills Boulevard	11.15
Mission Trails	Regional Park	1 Father Junipero Serra Trail	192.00
Santee Lakes	Community Park	9310 Fanita Parkway	57.50
Shadow Hill	Neighborhood Park	9161 Shadow Hill Road	4.51
West Hills	Neighborhood Park	8790 Mast Boulevard	13.99
Woodglen Vista	Neighborhood Park	10250 Woodglen Vista Drive	9.74
Total			375.48

Source: City of Santee 2017a.

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City of Santee

The portion of the project site that is within the City of Santee is designated in its *General Plan Land Use Map* as Park/Open Space (P/OS), Planned Development (PD), and Low-Medium Density Residential (R2) (City of Santee 2017b). Within the R2 zone, the project proposes construction of one single-family home and revision to the driveway access to the existing home at 9225 Inwood Drive.

The City of Santee oversees development, operation, and maintenance of its parks and recreational facilities. The City of Santee's *Parks and Recreation Master Plan Update* (City of Santee 2017a) sets the City of Santee's goal for parks as 5 acres of developed public parkland for every 1,000 people in Santee, and 5 acres of other recreational facilities for every 1,000 people in Santee. Developed public parkland includes neighborhood parks and community parks, as identified by the *City of Santee's Parks and Recreation Master Plan Update* (City of Santee 2017a), and other recreational facilities include facilities such as school sites and the Santee Lakes Recreation Preserve (City of Santee 2003). The Santee Lakes Recreation Preserve, located north of the project site, provides recreational amenities such as camping, cabin rentals, fishing, boating, playgrounds, walking trails, facility rentals, and special events, and has approximately 230 bird species to observe. Santee Lakes Recreation Preserve is owned and operated by the Padre Dam Municipal Water District (PDMWD) (Santee Lakes Recreation Preserve 2023).

City of San Diego

Approximately 64 acres of the existing golf course is within the *East Elliot Community Plan* area (City of San Diego 2015) and designated in the City of San Diego's *General Plan* as Open Space (City of Santee 2017b); the existing golf course is currently operating consistently with this use. The zoning designation for the 64-acre parcel is RS-1-8, and the golf course is currently operating consistently with this use. The City of San Diego's land use authority extends to the 64-acre portion of the golf course within the City of San Diego. The applicant is processing a site development permit with the City of San Diego for the 64-acre site to remodel the golf course.

The City of San Diego's Parks and Recreation Department maintains more than 40,000 acres of developed and undeveloped parkland categorized as population-based parks, resource-based parks, and open space. Resource-based parks are located at, or centered on, notable natural or artificial features (e.g., beaches, canyons, habitat systems, lakes, historic sites, cultural facilities) and are intended to serve the citywide population and visitors (City of San Diego 2021a). Population-based parks (commonly known as *Neighborhood and Community Parks*) are facilities and services in proximity to residential development and are intended to serve the daily needs of the neighborhood and community. Open space lands are City of San Diego-owned lands located throughout the City of San Diego consisting of canyons, mesas, and other natural landforms. This open space is intended to preserve and protect native plants and animals while providing public access and offering users hiking, biking, and equestrian trails.

Mission Trails Regional Park, directly west of the project site, provides a host of recreational and educational opportunities, such as 60 miles of trails, boating on Lake Murray, camping at Kumeyaay Lake, numerous informative and organized hikes, and a visitor center (Mission Trails Regional Park Foundation 2024).

The San Diego River Trail, located west of the project site, is a regional multipurpose trail and pathway for pedestrians, bicyclists, and other users that serves as the unifying thread for the San Diego River Park system; it offers recreational opportunities and access to park facilities and nature. It runs along the San Diego River and connects the Lakeside Baseball Fields and the western terminus within the City of Santee. Currently, there is a gap in the trail between the intersection of Mast Boulevard/the State Route (SR-) 52 eastbound ramps and the eastern project boundary. The San

Diego Association of Governments (SANDAG) has developed a plan to complete this portion of the San Diego River Trail by constructing it along the southern edge of the project site. A Mitigated Negative Declaration was adopted by SANDAG's Transportation Committee on June 16, 2017 (SANDAG 2017), and the bicycleway is currently in the engineering design phase, with a construction schedule still to be set. The SANDAG segment would be funded through Transnet, the regional half-cent sales tax for transportation administered by SANDAG, although construction funds have not yet been identified. Although the Carlton Oaks Golf Course segment of the San Diego River Trail is not part of the proposed project, the project applicant would continue to work with the City of Santee, City of San Diego, and SANDAG to ensure that the proposed project's design would not impede with implementation of the trail.

3.15.3 Applicable Laws and Regulations

3.15.3.1 Federal

National Trails System Act of 1968 (Public Law 90-543)

The National Trails System Act of 1968 instituted a nationwide system of interstate trails that provide a variety of outdoor recreation uses. This act reflects the federal government's goals of preserving and developing new trails, and aims to protect existing trails and provide for new trails and related facilities.

3.15.3.2 State

California State Government Code 66477 (the Quimby Act)

California State Government Code 66477 (the Quimby Act) specifies that new subdivisions can be required to dedicate land, or pay a fee in lieu of dedication, for local parks at 3 acres per 1,000 population; up to 5 acres per 1,000 population can be required if the current local park acreage exceeds the 3-acre level. Revenues generated through the Quimby Act cannot be used for operation and maintenance of park facilities.

Senate Bill 1685

Senate Bill 1685 authorizes open space districts to levy special assessments for open space purposes. The enabling legislation for regional open space districts is California Public Resources Code Sections 5500 et seq. and California State Government Code Sections 56000 et seq. Pursuant to these codes, regional park and open space districts are formed when three or more jurisdictions, together with any parcel of city or county territory, organize a contiguous area with the intent for the designated space to serve the park and recreational needs in the county. Senate Bill 1685 is the same authority as that for regional park and open space districts.

3.15.3.3 Local

City of Santee

General Plan

The City of Santee's *General Plan* provides standards relating to parks and recreational facilities in the *Conservation Element*, *Recreation Element*, and *Trails Element*. As discussed in the *Conservation Element*, the City of Santee provides four types of recreational accommodations for residents and visitors. The *Conservation Element* also contains goals, guidelines, and policies to guide the management of the community's natural and artificial

resources, and requires that the proposed project conserve and manage the natural resources and open space present on the project site (City of Santee 2003a). The following objectives and policies are relevant to the proposed project.

Conservation Element

Objective 11.0: Promote a balanced mix of open space uses with development throughout the City to enhance visual resources, avoid hazards and conserve resources.

Policy 11.1: The City should promote the dedication of open space or parklands and the designation of private open space within all proposed residential developments.

Policy 11.2: The City should encourage, where feasible, the development of an interconnected system of open spaces throughout the City.

Recreation Element

The *Recreation Element* of the City of Santee's *General Plan* contains goals, guidelines, and policies to guide the management of the parks and recreational system, and requires projects to provide adequate active and passive forms of recreation. The *Recreation Element* recognizes the contributory role habitat preserves can play in meeting the recreational needs of citizens. For example, the San Diego River Park provides controlled public access along the San Diego River, but segments of the floodway are permanently protected by conservation easements (i.e., Walker Preserve, Lowes Preserve, Helix Mitigation Bank) (City of Santee 2003b).

The *Recreation Element* also recognizes the City of Santee's *Draft Multiple Species Conservation Program Subarea Plan* as contributing to passive recreational opportunities, such as hiking, biking, and nature appreciation. The *Recreation Element* specifically identifies the northwestern quadrant of the City of Santee as benefiting from the future park facilities and access to planned trails on the project site and within the City of Santee's *Draft Multiple Species Conservation Program Subarea Plan* area. The *Recreation Element* anticipates that recreational use of the preserve "will need to be consistent with the habitat protection guidelines in the City [of Santee's] Subarea Plan and Implementing Agreement" (City of Santee 2003b). The following objectives and policies are relevant to the proposed project:

Objective 1.0: Provide a minimum of 10 acres of park and recreational facilities for every 1,000 population in Santee. These 10 acres could include a combination of local parks, trails, school playgrounds, and other public facilities that meet part of the need for local recreational facilities.

Policy 1.1: The City shall increase the amount of park and recreational facility acreage in Santee to more closely conform to the local parkland standard.

Objective 2.0: Provide adequate recreational acreage and facilities in all areas of the City.

Policy 2.2: The City shall encourage the inclusion of recreational facilities in all mixed land use developments, especially within the Town Center and the Fanita Ranch.

Trails Element

As discussed in the *Trails Element* of the City of Santee's *General Plan*, the City of Santee plans to continue developing bicycle, equestrian, and pedestrian trails throughout Santee to expand recreational and commuter use of this trails system. The *Trails Element* also contains goals, guidelines, and policies to guide the development and management of the trails system, and requires that the project site provide trails for both private and public use (City of Santee 2003c). The following objectives and policies are relevant to the proposed project:

Objective 1.0: Provide safe and viable regional and community trails within the City.

Policy 1.1: Priority should be placed on establishing multiple use trails (pedestrians, bicyclists, equestrians) wherever feasible.

Policy 1.2: All new subdivisions or planned developments whether residential, commercial, or industrial which include proposed trail locations shall dedicate easements which will provide safe and direct access to community or regional trails, and provide for trail maintenance.

Policy 1.5: The City's trail network should link focal points of the City such as Town Center, Fanita Ranch, employment centers, schools, residential neighborhoods, parks and open space, and the San Diego River.

Objective 2.0: Provide trails which are designed to impact the environment as little as possible and which blend in with the character of the community.

Policy 2.1: Trails should be surfaced with materials which blend in with the surrounding area while complying with safety and maintenance requirements.

Policy 2.3: When determining final alignments for planned trails in open space areas, priority should be given to utilizing existing trails where feasible, before creating new trails. When necessary, new trails should follow contour lines and should be aligned where the least amount of grading and/or habitat disruption would occur.

Objective 3.0: Provide accommodations for the trail user wherever possible.

Policy 3.3: Signage should be utilized to identify trail corridors.

Policy 3.4: The City should include both hiking and bicycle trails in any trail system; equestrian trails shall also be considered.

Objective 5.0: To provide paved trails which are safe.

Policy 5.2: Trails should be designed to facilitate bicycle riding by incorporating standards which would reduce slopes, sharp curves, and interference with vegetation, pedestrians, and traffic.

Policy 5.3: Bicycle paths should be incorporated into the design of community land use plans, Capital Improvement Projects, and in parks and open space as specified in the General Plan.

Objective 6.0: Provide unimproved trails that are viable routes within the community.

Policy 6.1: Priority shall be given to designating unimproved trails for multipurpose use whenever feasible.

Objective 7.0: Provide trails which are safe.

Policy 7.1: The determination of appropriate type of trails should primarily be based on safety requirements.

Policy 7.4: Unimproved trails which are not subject to maintenance shall be posted at trails entrances to advise users of trail risks.

Objective 8.0: Provide community trails that link with regional trail systems and facilities.

Policy 8.3: Encourage trail connections which take advantage of trailhead and support facilities planned or existing within neighboring regional parks.

Objective 9.0: Provide trails within the future Multiple Species Conservation Program Preserve which are consistent with the City's Subarea Plan and Implementing Agreement.

Policy 9.1: Preference should be given to locating trails in the least sensitive areas of the Preserve and utilize existing trails/dirt roads to the extent feasible.

Policy 9.2: Avoid placing new trails between different habitat types where resource sensitivities and values are high.

Policy 9.3: The width of new trails should be minimized to the extent possible to avoid impacting critical resources.

Policy 9.4: Fencing should be considered in strategic locations to limit off-trail use in sensitive resource areas.

Policy 9.5: Equestrian trails and staging areas should be located a sufficient distance from riparian or coastal sage scrub resources to minimize the possibility of cowbird parasitism and ensure biological values are not impaired.

Policy 9.6: Avoid conflicts with key movement routes utilized by wildlife to the maximum extent possible.

Municipal Code

The City of Santee Municipal Code Chapter 12.30, Development Impact Fees, establishes provisions for assessing and collecting fees as a condition of approval of a final map or as a condition of issuing a building permit. New development in Santee that would require construction of new public facilities—including drainage improvements, traffic improvements, traffic signals, public park facilities, community facilities and other public improvements, public services, and community amenities—is required to pay the costs of constructing the public facilities reasonably related to the impacts of the new development.

In addition, Santee Municipal Code Chapter 12.40, Park Lands Dedication, establishes the provision for dedication of land, payment of in-lieu fees, or a combination of both to provide park and recreational facilities to serve future residents of a subdivision development. Santee Municipal Code Section 12.40.070 requires the amount of land to

be dedicated based on the average occupancy rate per residential unit type and the ratio of dedication equivalent to 5 acres per 1,000 residents.

Parks and Recreational Master Plan Update

The City of Santee's *Parks and Recreational Master Plan Update* provides an assessment of the City of Santee's parks and recreational system and is used as a planning document for future growth in the community (City of Santee 2017a). The plan is designed to provide an understanding of the community's needs, attitudes, interests, and priorities, and is intended to aid the City of Santee in planning for policy making and management decision making. The Parks and Recreational Master Plan supplements the City of Santee's *General Plan*.

City of San Diego

General Plan

The City of San Diego's *General Plan* provides standards for population-based parks and recreational facilities, which include recreation centers and aquatic complexes. The standard for population-based parks is 2.8 acres per 1,000 residents, which can be achieved through a combination of neighborhood and community parks and park equivalencies (City of San Diego 2021a).

Public Facilities, Services, and Safety Element

The *Public Facilities, Services, and Safety Element* (City of San Diego 2023) of the City of San Diego's *General Plan* includes policies on the prioritization and provision of park and recreation facilities. The following policies are relevant to the proposed project:

Policy PF-A.2: Plan for public space such as libraries, public markets, and parks that will be attractive to families with children.

Policy PF- B.4b: Require development proposals to fully address impacts to public facilities and services. Projects should identify specific improvements and financing which would be provided by the project, including but not limited to sewer, water, storm drain, solid waste, fire, police, libraries, parks, open space, and transportation projects.

Recreation Element

The *Recreation Element* of the City of San Diego's *General Plan* (City of San Deigo 2021a) includes policies that encourage the acquisition, development, operation/maintenance, increase, and enhancement of public recreational opportunities and facilities throughout the City of San Diego. The following policies are relevant to the proposed project:

Policy RE-A.8: Fully implement and achieve the park standards identified in the PMP, including land acquisition.

Policy RE-A.9: Identify opportunities to increase recreational value and population-based parks within the community consistent with the PMP by planning for upgrades and new investments within existing parks. Allow for flexibility and innovation to provide parks and recreational opportunities.

Policy RE-A.10: Encourage private development to include recreation facilities, such as children’s play areas, rooftop parks and courts, useable public plazas, and mini-parks.

Municipal Code Section 142.0640

The City of San Diego requires payment of development impact fees to collect a proportional fair-share cost of capital improvements needed to offset the impact of the development (San Diego Municipal Code Section 142.0640). These fees are based on community-specific financing plans completed when community plans are updated. Financing plans were formerly known as *Public Facility Financing Plans* and are now referred to as *Impact Fee Studies*.

Parks Master Plan

Adopted August 2021, the City of San Diego’s *Parks Master Plan* (City of San Diego 2021b) identifies policies, actions, and partnerships for planning parks, recreational facilities, and programs that create a citywide network of recreational experiences. The City of San Diego’s *Parks Master Plan* identifies existing gaps to guide future park development, and promotes equity throughout the City of San Diego by establishing new equity goals, new 10-20-30-40-minute access goals, new park standards for new development that measure recreational value, and citywide Park Development Impact Fees. New park standards apply to new development and were created specifically to address park access issues in densely populated areas.

The City of San Diego’s *Parks Master Plan* establishes a new park standard, the Recreational Value-Based Park Standard (Value Standard), which differs from the previous population-based standard. The Value Standard applies to population-based parks and portions of regional parks that serve local populations. The Value Standard is not intended to be applied to portions of regional parks that serve regional populations, including trails, shorelines, and open space parks; regional assets are evaluated during future community plan updates. The Value Standard determines the value of parks in points based on features related to park size, recreational opportunities, access, amenities, activations, and overall value delivered. As an outcome-based measure, the Value Standard recognizes the value of parks appropriate for diverse communities, from ball fields to pocket parks to trails. The Value Standard is based on four communities that met the previous acreage standard of 2.8 acres per 1,000 residents in 2020. The score was based on recreational amenities, yielding a recreation value of 100 points per 1,000 people that is now applied citywide.

The City of San Diego’s *Parks Master Plan* also provides the vision for providing recreational opportunities to residents of the City of San Diego. It outlines the standard for providing population-based parks, known as the Recreational Value-Based Park Standard, which establishes a point value to represent recreational opportunities within population-based parks to assess the need for upgrades and new park facilities. The City of San Diego’s *Parks Master Plan* serves as a policy framework to guide future park development efforts (City of San Diego 2021b).

San Diego River Park Master Plan

The San Diego City Council adopted the *San Diego River Park Master Plan* on May 20, 2013 (City of San Diego 2013). The *San Diego River Park Master Plan*’s goal is to provide the vision and guidance to reverse the San Diego River’s threatened condition and restore the symbiotic relationship between the river and surrounding communities. The *San Diego River Park Master Plan*’s vision, principles, recommendations, and implementation strategy provide the City of San Diego with a strong policy document for future development along the river. Recommendations are divided into general

recommendations for the entire river park area, extending from the City of Julian to the Pacific Ocean, and specific reach recommendations for the six distinct geographic areas of the river (City of San Diego 2013)

3.15.4 Project Impact Analysis

3.15.4.1 Methodology

Recreational impacts are related to the proposed project's potential to accelerate the physical deterioration of existing recreational facilities. In addition, recreational impacts may occur if the proposed project would implement recreational amenities that would directly result in a physical impact on the environment.

3.15.4.2 Thresholds of Significance

The following significance criteria are based on California Environmental Quality Act (CEQA) Guidelines Appendix G and the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2022) and provide the basis for determining the significance of impacts associated with recreation that could result from implementation of the proposed project.

Impacts would be significant if the project were to result in any of the following:

1. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
2. Include recreational facilities or require the construction or expansion of recreational facilities, which may have an adverse physical effect on the environment.

3.15.5 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the proposed project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Impact Discussion

The project site is located on approximately 165 acres and is being developed as a mixed-use project. In addition to the redesign of the golf course, the project would include residential areas and both active and passive recreational opportunities, including a golf course clubhouse, restaurant/bar, pro shop, golf learning center, additional resort facilities, and a multipurpose public trail that would link with existing and planned trails east and west of the project site.

The proposed project would redevelop the existing golf course, which is currently underutilized, with a professionally designed layout to provide a more engaging golfing experience. The length of the golf course would be reduced from approximately 7,300 yards to 6,450 yards to enhance the golf experience and appeal to a broader range of players. The residential uses would be accessory to the golf course and the Carlton Oaks Country Club. Residential West would consist of 86 multifamily detached homes, and Residential North would include 150 multifamily detached homes. The project would also include six single-family lots fronting Carlton Oaks Drive that would allow for single-story homes.

Recreational facilities for Residential North would include approximately 21,000 square feet of community recreational space, which would be located on the eastern boundary of Residential North and would include a play structure with resilient surfacing, picnic tables covered by a shade structure, and a dog-run area. A separate recreational area would be provided in the southeastern portion of Residential North and would include an outdoor pool, pool house, dining tables, chaise lounge chairs, and outdoor showers. The residential uses in Residential North would include private yards.

Recreational facilities for Residential West would include approximately 12,500 square feet of recreational space split between two areas: a playground, picnic tables, shade structure, and an overlook area with bench seating would be located along the southwestern boundary of Residential West, and a dog-run area with artificial turf and shade trees would be located in the eastern portion of Residential West. The residential uses in Residential West would also include private yards.

In addition to the recreational facilities on the residential portions of the project site, a multipurpose public trail would be provided on the property on the northern side of the San Diego River, linking with existing and planned trails east and west of the site (Project Trail Segment). A portion of the Project Trail Segment on the eastern side of the project site would be provided beginning at the entrance of Residential North at Carlton Oaks Drive, traversing through the resort and along the southeastern border of the project site, and ending slightly west of the jurisdictional line between the City of Santee and the City of San Diego. This portion of the trail would vary in width from 6 feet to 10 feet, with a mix of surface treatments consisting of decomposed granite and enhanced paving. Additionally, this portion of the trail would link to the existing Mast Park West Trail and the future planned trail known as the Carlton Oaks Golf Course Segment (SANDAG 2017).

A portion of the Project Trail Segment on the western side of the project site would be constructed beginning at the City of Santee jurisdictional line and ending at the property line (i.e., project site). This portion of the trail would link to the future planned trail known as the Carlton Oaks Golf Course Segment. Along the Residential West boundary, a graded bench (located within the Carlton Oaks Golf Course Segment) would be provided within the easement areas that the City of San Diego would grant to the applicant as a part of this project.

In addition to the trail alignment currently proposed through Residential North and the County Club and Resort Area, a supplemental trail offer of dedication is shown on the applicant's map should the City of Santee request this supplemental trail alignment. The supplemental trail offer of dedication is 12 feet wide and starts from an area east of the Country Club and Resort parking lot to the property line of the Vista del Verde community (Figure 2-3, Proposed Site Plan, in Chapter 2, Project Description). If the City of Santee were to request this supplemental segment, then the applicant will agree to dedicate the trail alignment and construct this trail at a later date.

The analysis below discusses the potential for project construction workers and existing and future residents and visitors to use existing recreational facilities to such an extent as to accelerate their physical deterioration.

Construction

Construction activities would bring a daily workforce of construction workers to the project site; however, it is not expected that they would use existing neighborhood or regional parks or other recreational facilities to such a degree and for such a duration that there would be a substantial physical deterioration of the existing facilities. As a result, project construction would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated.

Operation

Residents would be able to access the recreational and commercial uses at the Carlton Oaks Country Club and Golf Course by an interconnected system of golf cart paths, a multiuse path, and sidewalks that would encourage pedestrian and bicycle access to these facilities.

The Carlton Oaks Golf Course Segment, of which the Project Trail Segment is a part, is explicitly identified as a regional improvement in the planning documents adopted by the City of San Diego, City of Santee, and SANDAG. The *Trails Element* of the City of Santee's *General Plan*, which identifies the City of Santee's recreational and commuter trails and pathways, shows the Carlton Oaks Golf Course Segment as a planned trail, and it has been designated as a regional trail that serves the entire region (City of Santee 2003c).

The City of Santee's *General Plan – Recreation Element* establishes the general method for determining the acreage of parks and recreational facilities required to serve a known population demand. Objective 1.0 of the *Recreation Element* establishes the City of Santee's goal to "provide a minimum of 10 acres of parks and recreational facilities per 1,000 population in Santee. These 10 acres could include a combination of local parks, trails, school playgrounds and other public facilities that meet part of the need for local recreational facilities" (City of Santee 2003b).

Chapter 12.40 of the Santee Municipal Code also establishes the requirements for dedication of land, payment of in-lieu fees, or a combination of both, for the purpose of providing parks and recreational facilities to serve future residents of a development. Section 12.40.070 of the Santee Municipal Code requires the amount of land to be dedicated based on the average occupancy rate per residential type and the ratio of dedication equivalent to 5 acres per 1,000 residents.

As discussed in Section 3.13, Population and Housing, the proposed project would develop 242 new dwelling units within the City of Santee, representing an increase in population of approximately 686 persons. As discussed previously, the Santee Municipal Code sets a goal of 5 acres of park and recreational facilities per 1,000 residents. The increase in population from implementation of the proposed project would require approximately 3.43 acres of additional parkland. Instead of providing the parkland on site, the project proponents would pay in-lieu fees per Santee Municipal Code Chapter 12.40, Park Lands Dedication.

The City of San Diego's land use authority extends to the 64-acre portion of the golf course located within the City of San Diego. Carlton Oaks is processing a site development permit with the City of San Diego for the 64-acre site to remodel the golf course. No residential units would be developed within the City of San Diego.

In addition, the proposed project is consistent with the objectives, goals, programs, and policies of regulatory plans, such as the City of Santee's *Parks and Recreational Master Plan Update* (City of Santee 2017a), City of San Diego's *Parks Master Plan* (City of San Diego 2021b), and *San Diego River Park Master Plan* (City of San Diego 2013).

The *San Diego River Park Master Plan* discusses the potential for the golf course to accommodate the San Diego River Pathway on its southern edge, near the river. In addition, the *San Diego River Park (or appMaster Plan* notes that redesigning the golf course to be more sensitive to the hydrology of the river and to create habitat corridors are ways in which the golf course may accommodate multiple user groups (City of San Diego 2013). The redesigned golf course and expanded recreational opportunities would provide new recreational space in residential areas and trail segments, which would provide access to the existing Mast Park West Trail and the future planned trail known as the Carlton Oaks Golf Course Segment. Development of these trail segments as part of the proposed project

would provide linkages to existing and planned San Diego River trails to the east and west of the project site, and would not obstruct construction of the planned regional trail.

The recreational space in the proposed residential areas would provide approximately 0.92 acres of recreational uses, in addition to the proposed multipurpose trail within the city of Santee, which would provide 0.7 acres (or approximately 4,000 linear feet of new trails). The proposed project would pay in-lieu park fees to comply with the Santee Municipal Code requirements stated above. Because the proposed project would pay the required park fees to satisfy the Santee Municipal Code and *General Plan* requirements, and would provide additional recreational opportunities, the proposed project would not lead to a substantial deterioration of existing neighborhood or regional parks or other recreational facilities.

The proposed project would necessitate a nominal number of employees for operation of the redeveloped clubhouse and resort; however, this increase is anticipated to be relatively small compared to the employment opportunities at the existing clubhouse and resort. It is likely that these employees would come from within the region, and the nominal number of employees would not result in a substantial influx of new workers and their families that would increase the use of parks and recreational facilities. In addition, although these employees may use parks and recreational facilities within the project site on lunch breaks or after their shifts end, the number of employees is considered nominal and would not result in a noticeable increased use of existing parks or other recreational facilities such that substantial physical deterioration would occur.

As discussed above, the proposed project's recreational improvements would align with the objectives, goals, programs, and policies of regulatory plans such as the City of Santee's *Parks and Recreational Master Plan Update*, City of San Diego's *Parks Master Plan*, and *San Diego River Park Master Plan*. The project proponents would pay the required in-lieu fees, in compliance with the Santee Municipal Code, to provide park and recreational facilities to serve future residents; the funds also could be spent on existing park facilities. The proposed project would also provide a wider variety of recreational opportunities, including a multipurpose trail and residential access to the golf course, that would meet the community's needs. As a result, the proposed project would not increase the use of existing neighborhood or regional parks or other recreational facilities in such a way that substantial physical deterioration of these facilities would occur or be accelerated. Therefore, impacts would be less than significant, and no mitigation would be required.

Impact Determination

Implementation of the proposed project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would implementation of the proposed project include recreational facilities or require the construction or expansion of recreational facilities, which may have an adverse physical effect on the environment?

Impact Discussion

The proposed project would involve a redesign of the existing golf course and construction of new recreational spaces within the residential development areas that would include playgrounds, bench seating, picnic tables, shade trees, outdoor pool area, and dog runs. In addition, a multipurpose trail would be constructed on the project site that would link with existing and planned trails to the east and west of the project site. On the eastern side of the project site, a portion of the Project Trail Segment would be provided, beginning at the entrance of Residential North at Carlton Oaks Drive, traversing through the resort and along the southeastern border of the project site, and ending at the jurisdictional line between the City of Santee and the City of San Diego. This portion of the trail would link to the existing Mast Park West Trail and to the planned Carlton Oaks Golf Course Segment. On the western side of the project site, a portion of the Project Trail Segment would be constructed, beginning at the City of Santee jurisdictional line and ending at the property line of the project site. This portion of the trail would link to the planned Carlton Oaks Golf Course Segment.

Potential impacts associated with construction of the proposed project, including the proposed golf course redesign, new recreational space, and trail segments, have been analyzed throughout the applicable sections of this Environmental Impact Report (EIR). Especially relevant sections include Section 3.1, Aesthetics and Visual Resources; Section 3.2, Air Quality and Health Risks; Section 3.3, Biological Resources; Section 3.4, Cultural and Tribal Cultural Resources; Section 3.7, Greenhouse Gas Emissions; Section 3.9, Hydrology and Water Quality; Section 3.12, Noise and Vibration; and Section 3.16, Transportation and Circulation.

Impact Determination

Impact REC-1: Construction of Recreational Facilities That Have the Potential to Result in Significant Impacts to the Environment.

Implementation of the proposed project could result in a significant impact if the construction or expansion of recreational facilities were to have an adverse physical effect on the environment. Potentially significant impact(s) were identified for air quality and health risks, biological resources, cultural and tribal cultural resources, hydrology and water quality, noise and vibration, and transportation and circulation. Therefore, impacts associated with the construction or expansion of recreational facilities would be potentially significant.

Mitigation Measures

Mitigation measures to reduce project impacts from construction of recreational facilities have been identified throughout this EIR, including in Section 3.2, Air Quality and Health Risks; Section 3.3, Biological Resources; Section 3.4, Cultural and Tribal Cultural Resources; Section 3.9, Hydrology and Water Quality; Section 3.12, Noise and Vibration; and Section 3.16, Transportation and Circulation. As described in these EIR sections, all impacts would

be reduced to less-than-significant levels with mitigation, except for transportation, where impacts would remain significant and unavoidable after all feasible mitigation is applied. No additional mitigation measures are required.

Level of Significance After Mitigation

Although transportation impacts associated with implementation of the proposed project as a whole would be significant and unavoidable, the impacts associated with implementation, construction, or expansion of the recreational facilities specifically would be less than significant because the trips associated with the recreational facilities would be considered a displacement rather than new vehicle miles traveled. As such, all of the secondary impacts, including transportation impacts, associated with the recreational facilities would be less than significant with mitigation.

3.15.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would implementation of the proposed project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The geographic context for increased use of existing neighborhood and regional parks or other recreational facilities is the Cities of Santee and San Diego and adjacent communities. Cumulative recreational impacts could occur if related projects in the Cities of Santee and San Diego and adjacent communities (see Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis) were to result in recreational impacts in conjunction with the proposed project. The demand for parks and recreational services is generally associated with an increase in housing or population; thus, this cumulative analysis considers related projects with a residential component, such as the 80-unit condominium development (Laurel Heights Condominiums) or the 67-unit single-family residential development (Walker Trails Subdivision) within the City of Santee. The area within the City of San Diego adjacent to the project site is largely open space and does not include any existing or planned residential developments. As such, no projects within the City of San Diego were considered in this analysis.

During construction of the proposed project and related projects, construction workers may use parks or recreational facilities in the project site, but the use would be temporary and would cease following construction. During operation, the proposed project would generate additional population; however, the proposed project's recreational facilities would be able to accommodate the additional population that would result from the proposed project, and the expected use from these users would not lead to the substantial deterioration of existing neighborhood or regional parks or other recreational facilities. The proposed project would also generate a small number of employees, which would not result in a noticeable increased use of existing parks or other recreational facilities. In addition, the proposed project's recreational improvements would be in compliance with the objectives, goals, programs, and policies of regulatory plans such as the City of Santee's *Parks and Recreational Master Plan Update* and *San Diego River Park Master Plan*.

Furthermore, both the proposed project and other related projects would be required to mitigate potential impacts on parks and recreational facilities through land dedication and required park dedication fees. All projects subject to Santee Municipal Code Section 12.40 are required to dedicate land or pay a fee in lieu of dedication, which would provide funding for additional parks and recreational facilities to satisfy demand from future population growth. This would be a condition of project approval, and the City of Santee would verify satisfaction of such requirements prior to the approval of the final map, or payment of fees prior to the issuance of any building permits (Santee Municipal Code Section 12.40). Additional funding for the maintenance of new parks and recreational

facilities is obtained primarily from the City of Santee’s General Funds, including property taxes collected from future project residents. The portion of the project site that is in San Diego would not add any new residents to the City of San Diego because no new residential units would be constructed in the City of San Diego as part of the proposed project. The new homes added by the project would be located in the City of Santee and would be required to mitigate impacts related to the addition of these residents consistently with City of Santee requirements. The project would also be constructing a trail that would link to regional trails in the vicinity.

Thus, a significant cumulative impact associated with the deterioration of parks and recreational facilities would not occur. In addition, the proposed project would pay the required in-lieu fees in compliance with the Santee Municipal Code, and would develop additional parks and recreational facilities to accommodate the proposed project’s residential uses. Therefore, the proposed project’s contribution would not be cumulatively considerable.

Cumulative Threshold 2: Would implementation of the proposed project include recreational facilities or require the construction or expansion of recreational facilities, which would have an adverse physical effect on the environment?

As discussed previously, the geographic context for construction or expansion of new recreational facilities is the Cities of Santee and San Diego and adjacent communities. Cumulative recreational impacts could occur if related projects in the Cities of Santee and San Diego and adjacent communities (see Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis) were to result in recreational impacts in conjunction with the proposed project. Any new or expanded recreational facilities in the Cities of Santee and San Diego and surrounding communities would be required under CEQA to perform environmental review and provide potential mitigation. It is reasonable to expect that these projects, like the proposed project, would comply with CEQA, and any project-specific impacts identified with the construction of these facilities would be mitigated to the extent feasible. Although transportation impacts associated with implementation of the proposed project as a whole would be significant and unavoidable, the impacts associated with implementation, construction, or expansion of the recreational facilities specifically would be less than significant because the trips associated with the recreational facilities would be considered a displacement rather than new vehicle miles traveled. As such, all of the secondary impacts, including transportation impacts, associated with the recreational facilities would be less than significant with mitigation. Therefore, in combination with other cumulative projects, the proposed project would not have the potential to result in a significant cumulative impact related to the construction or expansion of recreational facilities. The proposed project’s contribution would be less than significant with mitigation (**Impact C-REC-1**).

3.15.7 Summary of Significant Impacts

Table 3.15-2 provides a summary of the project’s significant recreational impacts and relevant mitigation measures.

Table 3.15-2. Summary of Significant Recreational Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact REC-1: Construction of Recreational Facilities That Have the Potential to Result in Significant Impacts to the Environment	Mitigation measures to reduce project impacts have been identified throughout this EIR, including Section 3.2, Air Quality and Health Risks; Section 3.3, Biological Resources; Section 3.4, Cultural and Tribal Cultural Resources; Section 3.9, Hydrology and Water Quality; Section 3.12, Noise and Vibration; and Section 3.16, Transportation and Circulation.	Less than significant	All impacts would be reduced to a less-than-significant level with mitigation. See Section 3.16, Transportation and Circulation, for additional details.
Impact C-REC-1: Construction of Recreational Facilities That Have the Potential to Result in Significant Impacts to the Environment	Refer to Impact REC-1.	Less than significant	Refer to Impact REC-1.

3.15.8 References

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- City of San Diego. 2021b. *Parks Master Plan*. Available: <https://www.sandiego.gov/sites/default/files/parks-master-plan-adopted-2021.pdf>. Accessed: July 2023.
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Mission Trails Regional Park Foundation. 2024. *A Park is Born*. Available: <https://mtrp.org/a-park-is-born/>. Accessed: June 2024.

SANDAG (San Diego Association of Governments). 2017. *San Diego River Trail Carlton Oaks Golf Course Segment Mitigated Negative Declaration*.

Santee Lakes Recreation Preserve. 2023. *About Us*. Available: <https://www.santeelakes.com/about-us/>. Accessed: June 2024.

3.16 Transportation and Circulation

3.16.1 Overview

This section describes the existing conditions of the circulation system surrounding the Carlton Oaks Country Club and Resort Project (project) site, and the applicable laws and regulations for transportation, circulation, and parking.

The information provided in this section is summarized from reports originally prepared in November 2022 and updated as shown below:

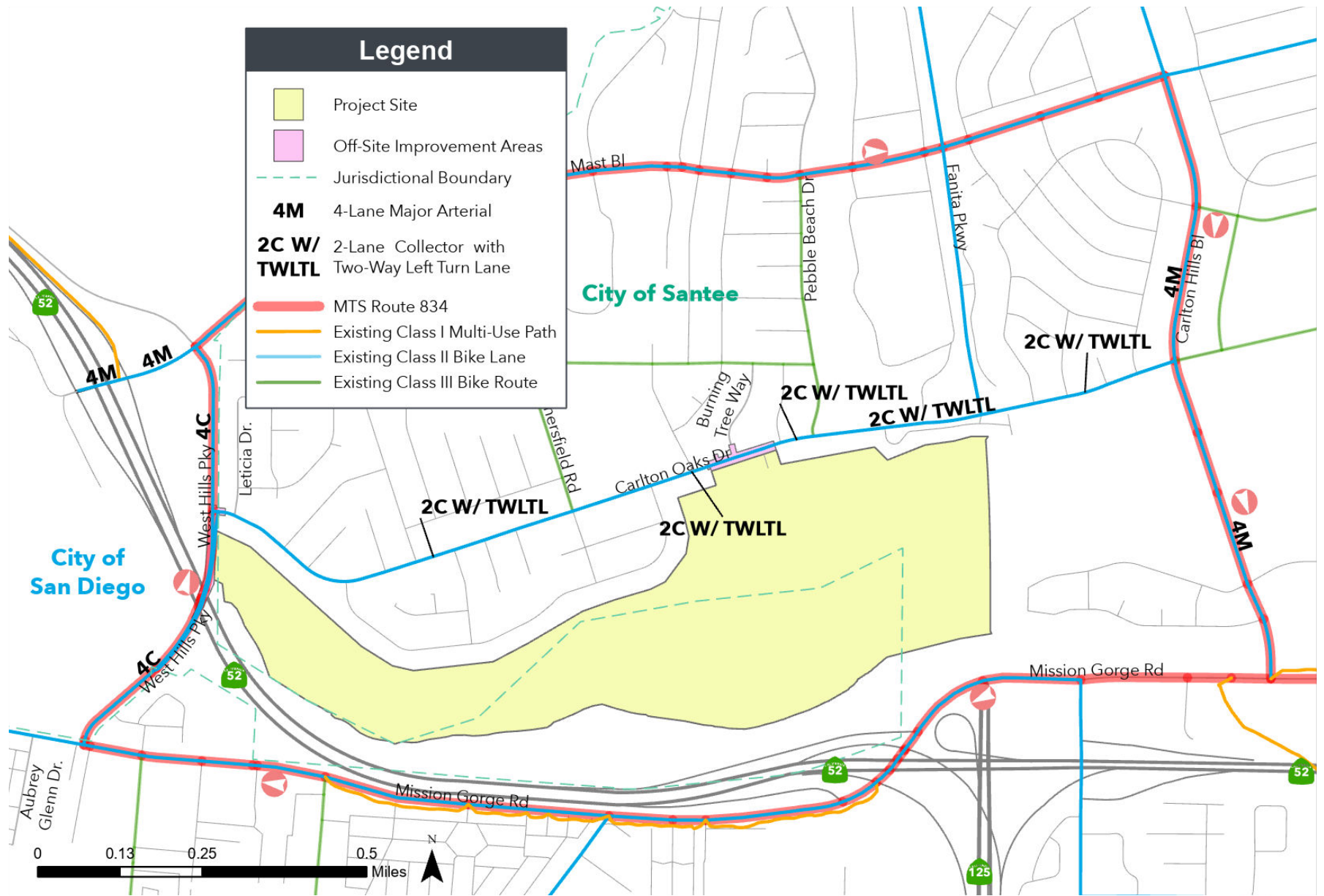
- **Carlton Oaks Country Club and Resort Draft Transportation Impact Study (TIS)**, May 6, 2025, prepared by Intersecting Metrics (Appendix 01)
- **Carlton Oaks Country Club and Resort Draft Local Transportation Assessment**, May 6, 2025, prepared by Intersecting Metrics (Appendix 02)
- **Country Club and Resort – Driving Range Berm – Transportation Assessment**, October 14, 2024, prepared by Intersecting Metrics (Appendix 03)

3.16.2 Environmental Setting

3.16.2.1 Transportation Study Area

Transportation and circulation related to the proposed project would affect streets and intersections surrounding the project site. These streets and intersections are within the jurisdiction of both the City of Santee and the City of San Diego. Portions of the open space/recreation (i.e., the golf course) are within both the City of Santee and the City of San Diego and are consistent with the respective cities' General Plans and zoning. Because the project's transportation study area includes transportation facilities in the City of Santee and the City of San Diego, the standards from each jurisdiction were applied. Transportation facilities within the City of Santee were evaluated using City of Santee standards, and transportation facilities within the City of San Diego were evaluated using City of San Diego standards. Figure 3.16-1 shows the surrounding roadway network in the existing condition.

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Source: Intersecting Metrics, 01/2025.

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Figure 3.16-1
Surrounding Roadway Network - Existing Conditions

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3.16.2.2 Driving Range

In 2023, as part of the existing golf course's continued operations, soil extracted from another project was transported to the project site to create a berm to aid in golf ball retention. Approximately 1,000 cubic yards of soil were moved to the existing driving range during a year-long period. A small bulldozer was used to spread the soil on the site's natural surface contours to create a berm along the outer edge of the driving range, adjacent to Sycamore Canyon Creek. No subsurface disturbance occurred as a result of the soil deposition.

On August 19, 2024, the City of Santee issued a Notice of Violation to the landowner of the project site. The Notice of Violation identified the transportation of the dirt to the driving range without the required permit as a violation of the City of Santee's Municipal Code. The landowner was directed to remove the transported dirt from the driving range and restore the area to preconstruction conditions to the satisfaction of the City of Santee Engineer. The appropriate regulatory agencies were also informed of the potential violation, and requested that any restoration be completed prior to the raptor season of 2025.

By the end of 2024, the soil and berm were removed, and the soil was transported off site. The driving range at the project site was returned to its existing topographic contours prior to the soil deposition. The remediation work involved removing the soil and berm from the driving range to restore the site to its original condition. The 1,000 cubic yards of soil was transported off site to a residential construction site just north of Robertson Street and west of Day Street in the unincorporated town of Ramona, approximately 25 miles away. Equipment used for this effort involved a 966 loader, a D6 dozer, and a water equipment truck for dust control.

Although the potential remedial measures are not components of the currently proposed project, the City of Santee requested that this Environmental Impact Report include information regarding these remedial measures for informational purposes. To this purpose, the remedial measures are more particularly described in the *Carlton Oaks Country Club and Resort – Driving Range Berm – Transportation Assessment* (Appendix O3). The original project included in its analysis the transportation of the dirt off site to another location. Therefore, Appendix O3 only includes the trips needed to remove the dirt from the project site and move it to the area in Ramona. The vehicle miles traveled (VMT) associated with the remediation work was determined not to exceed the screening level significance thresholds, as more particularly described in the *Carlton Oaks Country Club and Resort – Driving Range Berm – Transportation Assessment* (Appendix O3).

3.16.2.3 Transportation Facilities

Access to the project site from the regional transportation network would be provided via West Hills Parkway, Mast Boulevard, Carlton Oaks Drive, Carlton Hills Boulevard, and the San Diego River Trail. These facilities would either provide a direct connection to the proposed project via project driveways (i.e., West Hills Parkway and Carlton Oaks Drive). or would provide a critical link between the proposed project and the regional transportation network (i.e., Mast Boulevard and Carlton Hills Boulevard). Descriptions of these transportation network facilities are provided below.

North–South Roadways

Carlton Hills Boulevard

Carlton Hills Boulevard provides a connection between the proposed project and State Route (SR) 125, SR-52, and the commercial centers along Mission Gorge Road. Carlton Hills Boulevard between Mast Boulevard and Mission

Gorge Road is a four-lane roadway with a raised median and a posted speed limit of 35 miles per hour (mph). Sidewalks, on-street parking, and Class II bicycle lanes are provided on both sides of Carlton Hills Boulevard. San Diego Metropolitan Transit System (MTS) Bus Route 834 runs clockwise along Carlton Hills Boulevard (southbound direction), providing transit services between the western neighborhoods of Santee and the Santee Transit Center. MTS Bus Route 834 has an existing headway of 60 minutes throughout the day. The City of Santee's *General Plan – Mobility Element* (City of Santee 2017) classifies Carlton Hills Boulevard as a four-lane major arterial.

West Hills Parkway

West Hills Parkway runs along the western edge of the project site and would provide direct access to the proposed project via a single driveway. West Hills Parkway is a four-lane roadway with a striped or raised median, depending on the location, and a posted speed limit of 45 mph. Sidewalks are provided along the eastern side of West Hills Parkway and intermittently provided along the western side of the roadway. Parking is prohibited on both sides of the roadway. MTS Bus Route 834 runs clockwise on West Hills Parkway (northbound direction), providing transit services between the western neighborhoods of Santee and the Santee Transit Center. MTS Bus Route 834 has an existing headway of 60 minutes throughout the day. The closest bus stop to the project site is at the northeastern corner of Carlton Oaks Drive and West Hills Parkway. This segment of West Hill Parkway is within the City of San Diego; however, the *East Elliott Community Plan* (City of San Diego 2015) does not identify an ultimate classification for the roadway. The City of Santee's *General Plan – Mobility Element* (City of Santee 2017) classifies West Hills Boulevard as a four-lane major arterial.

East–West Roadways

Mast Boulevard

Mast Boulevard between the SR-52 eastbound ramps and West Hills Parkway provides a regional connection between the project site and SR-52. This segment of Mast Boulevard is a four-lane roadway with a raised or striped median, depending on the location, and a posted speed limit of 40 mph. Parking is currently prohibited along this segment of Mast Boulevard. Sidewalks are available on both sides of this segment, with the exception of the southern side of the roadway between the SR-52 eastbound ramps and SR-52 westbound ramps. Class II bicycle lanes are provided in both directions. MTS Bus Route 834 runs clockwise along Mast Boulevard (eastbound direction), providing transit services between the western neighborhoods of Santee and the Santee Transit Center. MTS Bus Route 834 has an existing headway of 60 minutes throughout the day. The City of Santee's *General Plan – Mobility Element* (City of Santee 2017) classifies Mast Boulevard as a four-lane major arterial east of the SR-52 ramps. The *East Elliott Community Plan* (City of San Diego 2015) does not identify a classification for the portions of Mast Boulevard that are located within the City of San Diego.

Carlton Oaks Drive

Carlton Oaks Drive would provide direct access for the proposed project via a single driveway at the Burning Tree Way intersection. Along the project frontage between West Hills Parkway and Fanita Parkway, Carlton Oaks Drive is a two-lane roadway with a continuous left-turn lane and a 35 mph posted speed limit. Sidewalks and Class II bicycle lanes are available on both sides of Carlton Oaks Drive. No transit routes or services are currently available along Carlton Oaks Drive. The City of Santee's *General Plan – Mobility Element* (City of Santee 2017) classifies Carlton Oaks Drive as a two-lane collector with a two-way left-turn lane.

Regional Trail

San Diego River Trail

The San Diego River Trail is a regional Class I Multi-Use path that runs along the San Diego River and connects the Lakeside Baseball Fields with the western terminus within the City of Santee. Currently, there is a gap in the trail between the intersection of Mast Boulevard/the SR-52 eastbound ramps and the eastern project boundary. The San Diego Association of Governments (SANDAG) has developed a plan to complete this portion of the San Diego River Trail by constructing it along the southern edge of the project site. A Mitigated Negative Declaration was adopted by the SANDAG Transportation Committee on June 16, 2017 (SANDAG 2017), and the bikeway is currently in the engineering design phase, with a construction schedule still to be set. The SANDAG segment would be funded through Transnet, the regional half-cent sales tax for transportation administered by SANDAG, although construction funds have not yet been identified. Although the Carlton Oaks golf course segment of the San Diego River Trail is not part of the proposed project, the project applicant would continue to work with the City of Santee, City of San Diego, and SANDAG to ensure that the proposed project's design would not impede implementation of the trail.

3.16.3 Applicable Laws and Regulations

3.16.3.1 State

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law, starting the process of fundamentally changing the way transportation impacts are analyzed under CEQA. Within the State CEQA Guidelines, these changes include elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The 2018 CEQA Guidelines update package included a new threshold guidance to address the new transportation metrics (OPR 2018). The California Governor's Office of Planning and Research (OPR) updated and released the *Technical Advisory on Evaluation Transportation Impacts on CEQA* (Technical Advisory) in December 2018 (OPR 2018), providing guidelines for compliance with the CEQA update. The Technical Advisory also provides substantial evidence for recommended VMT based significance thresholds, which jurisdictions can adopt or project applicants can use in cases where jurisdictional specific standards are not provided.

3.16.3.2 Regional

San Diego Association of Governments 2021 Regional Plan

SANDAG's 2021 *Regional Plan* is a 30-year plan that serves as both the long-range Regional Transportation Plan and Sustainable Communities Strategy (SCS) for the San Diego region. The 2021 *Regional Plan* must comply with specific federal and state mandates, including a Sustainable Communities Strategy, per SB 375, *Sustainable Communities and Climate Protection Act of 2008*, which achieves greenhouse gas emission-reduction goals set by the California Air Resources Board, compliance with federal civil rights requirements (Title VI) and environmental justice considerations, air quality conformity, and a public participation process. The SANDAG Board of Directors adopted the *Final 2021 Regional Plan* on December 10, 2021 (SANDAG 2021).

3.16.3.3 Local

The project site is within the land use jurisdiction and control of both the City of Santee and the City of San Diego. The following local laws, regulations, and plans for each jurisdiction would only apply to the portion of the project site that lay within the applicable jurisdiction.

City of San Diego

General Plan

Mobility Element

The *Mobility Element* of the City of San Diego's *General Plan* defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network" (City of San Diego 2024). The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway system, intelligent transportation systems, transportation demand management (TDM), bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing (City of San Diego 2024). The following policies from the City of San Diego's *Mobility Element* are relevant to the proposed project:

Policy ME-A.4: Make sidewalks and street crossings accessible to pedestrians of all abilities. a. Meet or exceed all federal and state requirements. b. Provide special attention to the needs of children, the elderly, and people with disabilities. c. Maintain pedestrian facilities to be free of damage or trip hazards.

Policy ME-A.5: Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage. a. Minimize obstructions and barriers that inhibit pedestrian circulation. b. Consider pedestrian impacts when designing the width and number of driveways within a street segment.

Policy ME-B.4: Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multifamily housing, schools and colleges, and transit facility uses.

- a. Continue to require bicycle parking in commercial and multiple unit residential zones.
- b. Provide bicycle facilities and amenities to help reduce the number of vehicle trips

East Elliott Community Plan

The primary goal established in the *East Elliott Community Plan* as it relates to the proposed project is to construct the San Diego River Park Pathway from Carlton Oaks Golf Course, extending west under West Hills Boulevard and SR-52, to connect to Mission Trails Regional Park trail system (City of San Diego 2015).

Bicycle Master Plan

The *City of San Diego Bicycle Master Plan* provides a framework for making cycling a more practical and convenient transportation option for San Diegans with different riding purposes and at different skill levels (City of San Diego

2013). The Bicycle Master Plan is a 20-year policy document that guides the development and maintenance of San Diego's bicycle network. The bicycle network includes all roadways that bicyclists have the legal right to use, support facilities, and non-infrastructure programs. The plan includes direction for policymakers on expanding the existing bicycleway network, connecting gaps, addressing constrained areas, improving intersections, providing for greater local and regional connectivity, and encouraging more residents to bicycle more often. The 2013 *City of San Diego Bicycle Master Plan* builds on the 2002 Master Plan by updating bicycling needs by addressing changes to the bicycle network and overall infrastructure. It should be noted that the policies in the *City of San Diego Mobility Element* (adopted in 2024) now supersede those within the *Bicycle Master Plan*.

Pedestrian Master Plan

The Pedestrian Master Plan (City of San Diego 2006) provides guidelines to the City of San Diego that enhance neighborhood quality and mobility options through the facilitation of pedestrian improvement projects. *The Pedestrian Master Plan* both identifies and prioritizes pedestrian improvement projects through technical analysis and community input programs, which are typically grant-funded.

Vision Zero

Vision Zero is a street safety policy adopted by the City of San Diego in 2015 that promotes safe roadway design that is forgiving against driver mistakes, with a goal toward preventing collisions that result in severe injury or death. The Vision Zero Action Plan is guided by prioritization of funding for safe street design; strategies to reduce dangerous speeds, especially on Vision Zero corridors; data-driven enforcement of dangerous behaviors; education to promote good behavior; and performance measures to monitor and evaluate progress. The *Systemic Safety: The Data-Driven Path to Vision Zero* study uses 3 years of crash data in San Diego to develop an analytical approach to identifying crash patterns using number of travel lanes, intersection control types, and daily traffic volumes (City of San Diego 2019). Using the results of this analysis, the City of San Diego is pursuing a systemic series of low-cost safety improvements at the intersections projected to have an increased probability for collisions (hotspots). The goal of implementing the low-cost safety improvements at hotspot locations is to primitively reduce the likelihood of collisions at the identified intersections. This systemic strategy has a goal to reduce the number of collisions in the City of San Diego using the same level of capital investment as would be typical of spot location improvements, which are identified through historical collision analysis. City of Santee

General Plan

The City of Santee's *General Plan*, adopted in 2003 by Resolution 63-2003, established the overarching goal of establishing a multimodal transportation system that provides a safe, efficient, and serviceable circulation network that ensures the movement of people and goods meets the transportation needs of all sectors of Santee (City of Santee 2017).

Mobility Element

The goal of the City of Santee's *General Plan Mobility Element* is a balanced, interconnected multimodal transportation network that allows for the efficient and safe movement of all people and goods and supports the current and future needs of community members and travel generated by planned land uses. The City of Santee's *General Plan – Mobility Element* identifies major local needs, such as completion of SR-52 to SR-67 and SR-125 from SR-52 to I-8. In addition, major objectives include developing a multimodal transportation network of local roads, collectors, arterials, freeways, and transit routes that meet the circulation needs of Santee, minimizing

automobile travel by promoting alternative modes of transportation, upgrading and maintaining existing transportation corridors to meet urban safety standards, improve traffic safety, providing for adequate and safe movement of seniors and citizens with disabilities, and remaining actively involved in regional issues (City of Santee 2017). The following goals and policies are relevant to the proposed project:

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 LOS “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 Santee Town Center area. The City may approve a lower automobile LOS if it finds that the effectiveness of non-automotive components of the circulation system would be maintained or improved as a result.

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.

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.

Analysis Guidelines

Portions of the proposed project are located within both the City of Santee and the City of San Diego; thus, a VMT impact analysis was conducted for the proposed project utilizing each jurisdiction’s VMT significance thresholds.

City of Santee

The *City of Santee VMT Analysis Guidelines*, adopted April 27, 2022 (City of Santee 2022a), were utilized to determine the significance thresholds for potential VMT-related impacts that may be caused by the proposed project. The intention of the *City of Santee VMT Analysis Guidelines* (City of Santee 2022a) is to address the new transportation analysis metrics and requirements, significance thresholds, and standards enacted by SB-743 and State CEQA Guidelines Section 15064.3.

City of San Diego

The City of San Diego *Transportation Study Manual*, adopted September 19, 2022 (City of San Diego 2022), was used to determine the significance thresholds for potential VMT-related impacts caused by the proposed project.

The intention of the guidelines is to address the new transportation analysis metrics and requirements, significance thresholds, and standards enacted by SB-743 and Section 15064.3 of the CEQA Guidelines. Note that this section only provides a brief summary of information provided in the City of San Diego *Transportation Study Manual*.

3.16.4 Project Impact Analysis

3.16.4.1 Methodology

The following section describes the analysis methods outlined in the *City of Santee VMT Analysis Guidelines* (City of Santee 2022a) in which transportation related impacts are analyzed and identified. Note that this section only provides a brief summary of information provided in the *City of Santee VMT Analysis Guidelines* (City of Santee 2022a).

Operations

Analysis Tools

Both the *City of Santee VMT Analysis Guidelines* (City of Santee 2022a) and the *City of San Diego Transportation Study Manual* (City of San Diego 2022) prescribe using the latest SANDAG Regional Demand Model to perform the VMT analysis:

In general, transportation VMT analysis for CEQA should be conducted using the SANDAG Regional Travel Demand Model. The model outputs can be used to produce VMT/Capita, VMT/Employee, and Total VMT. There may be circumstances under which other tools and techniques should be used to perform VMT analysis. There are unique land uses that are not appropriately modeled using the SANDAG model, such as uses that have the majority of their activity on the weekends (the SANDAG Model produces weekday results) or projects that generate less than 2,400 average daily trips. (City of Santee 2022a, Section 2.2)

Additionally, the following is noted in *City of Santee VMT Analysis Guidelines* (City of Santee 2022a, Section 2.3.3), in regard to larger projects:

Larger projects would 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/Capita should be determined using the same method/scripts that SANDAG utilizes to calculate the VMT/Capita threshold. Note that 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.

Based on the timing of the proposed project analysis and discussions with the City of Santee, the SANDAG Series 14 Model (Activity-Based Model 2016 [ABM] 2+) was used for the proposed project VMT analysis.

Analysis Metrics

For land use development projects, the *City of Santee VMT Analysis Guidelines* (City of Santee 2022a) require that the following two metrics be analyzed to determine if a project has a significant transportation related impact:

1. **VMT/Capita:** Includes all vehicle-based person trips grouped and summed to the home location of individuals who are drivers or passengers on each trip, both home-based and non-homebased. The VMT for each home is then summed for all homes in a particular census tract and divided by the population of that census tract to arrive at VMT/Capita.
2. **VMT/Employee:** Includes all vehicle-based person trips grouped and summed to the work location of individuals on the trip. This includes all trips, not just work-related trips. The VMT for each work location is then summed for all work locations in a particular census tract and then divided by the total number of employees of that census tract to arrive at the VMT/Employee.

Pursuant to Table E1 of the *City of Santee VMT Analysis Guidelines* (City of Santee 2022a) and Table 3 of the *City of San Diego Transportation Study Manual* (City of San Diego 2022), a hotel is considered to have a trip-making characteristic closer to an employment project; therefore, the VMT/Employee methodology should be used for this land use category.

Screening Criteria (City of Santee)

The *City of Santee VMT Analysis Guidelines* (City of Santee 2022a, Section 2.3.1) provides the following thresholds (those meeting the criteria are not required to conduct a VMT analysis) to determine whether a project should conduct a VMT analysis:

- **Projects Located in a Transit Accessible Area:** Project located within one-half mile of an existing major transit stop or along a high-quality transit corridor (as defined by Section 21064.3 of the California Public Resources Code).
- **Small Projects:** Projects that generate less than 500 daily trips.
- **Projects in a VMT-Efficient Area:** Projects located in areas with an average VMT/Capita or VMT/Employee below the City of Santee's thresholds (see Table 2.1 [in City of Santee 2022a]).
- **Locally-Serving Retail Projects:** Retail projects with less than 50,000 square feet and are expected to draw approximately 75% of customers from the local area (roughly 3-miles).
- **Locally Serving Public Facilities:** Public facilities that serve the surrounding community or public facilities that are passive use.
- **Redevelopment Projects with Lower Total VMT:** Redevelopment projects where the proposed project's total project VMT is less than the existing land use's total VMT.
- **Infill Affordable Housing:** Housing located in an infill area, with 52% affordable housing, is located within a half-mile of a transit stop or station, and does not provide parking that exceeds the minimum requirements of the City of Santee's Municipal code.

The proposed project does not meet any of the criteria listed above. Therefore, a full VMT impact analysis was conducted.

City of San Diego

Screening Criteria

The City of San Diego *Transportation Study Manual* (City of San Diego 2022) provides the following thresholds to determine whether a project should conduct a VMT analysis:

- **Residential or Commercial Project Located in a VMT Efficient Area:** The project is a residential or commercial employment project located in a VMT efficient area (15% or more below the base year average VMT per Capita or VMT per Employee) based on the applicable location-based screening map produced by SANDAG.
- **Industrial or Agricultural Project Located in a VMT Efficient Area:** The project is an industrial employment or agricultural employment project located in VMT efficient area (in an area with average or below average base year VMT per Employee) based on the applicable location-based screening map produced by SANDAG.
- **Small Project:** The project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures.
- **Locally Serving Retail/Recreational Project:** The project is a locally serving retail/recreational project defined as having 100,000 square feet gross floor area or less and demonstrates through a market area study that the market capture area for the project is approximately three miles (or less) and serves a population of roughly 25,000 people or less. Locally serving retail is consistent with the definitions of Neighborhood Shopping Center in the San Diego Municipal Code Land Development Code Trip Generation Manual. Locally serving recreation land uses are listed in Appendix B, if they meet the square footage and market capture area above. Adding retail/recreation square footage (even if it is 100,000 square feet gross floor area or less) to an existing regional retail shopping area is not screened out.
- **Locally Serving Public Facility:** The project is a locally serving public facility defined as a public facility that serves the surrounding community or a public facility that is a passive use. The following are considered locally serving public facilities: transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices. Passive public uses include communication and utility buildings, water sanitation, and waste management.
- **Affordable Housing:** The project has access to transit⁴ and is wholly or has a portion that meets one of the following criteria: is affordable to persons with a household income equal to or less than 50% of the area median income (as defined by California Health and Safety Code Section 50093), housing for senior citizens [as defined in Section 143.0720(e)], housing for transitional foster youth, disabled veterans, or homeless persons [as defined in 143.0720(f)]. The units shall remain deed restricted for a period of at least 55 years. The project shall provide no more than the minimum amount of parking per unit, per San Diego Municipal Code Section 143.0744. Only the portion of the project that meets the above criteria is screened out. For example, if the project is 100 units with 10 deed-restricted affordable housing units, transportation VMT analysis would not be necessary for the 10 affordable units but would be necessary for the remaining 90 units (unless they meet one of the other screening criteria). For purposes of applying the small project screening criteria, the applicant would only include the trip generation for the non-affordable housing portion of the project (since the affordable housing portion is screened out).
- **Mixed Use Project Screening Considerations:** The project's individual land uses should be compared to the screening criteria above. It is possible for some of the mixed-use project's land uses to be screened out and some to require further analysis. For purposes of applying the small project screening criteria, the applicant would only include the trip generation for portions of the project that are not screened out based on other screening criteria. For example, if a project includes residential and retail, and the retail

component was screened out because it is locally serving; only the trip generation of the residential portion would be used to determine if the project meets the definition of a small project.

- **Redevelopment Project Screening Considerations:** The project is a redevelopment project that demonstrates that the proposed project's total project VMT is less than the existing land use's total VMT. Exception: If a project replaces affordable housing (either deed restricted or other types of affordable housing) with a smaller number of moderate-income or high-income residential units, the project is not screened out and must analyze VMT impacts.

The proposed project does not meet any of the criteria listed above. Therefore, a full VMT impact analysis was conducted.

Project Design Features

The project proponent would implement the following project design features (PDFs) to help reduce transportation and circulation impacts (the full text of these PDFs can be found in Chapter 2, Project Description):

PDF-12A: Traffic Control Plan

PDF-12B: Intersection Safety Improvements

PDF-14: Stormwater Quality Management Plan (SWQMP)

3.16.4.2 Thresholds of Significance

The following significance criteria are based on State CEQA Guidelines Appendix G and provide the basis for determining the significance of impacts on existing transportation and circulation conditions that could result from implementation of the proposed project. The determination of whether a transportation and circulation impact would be significant is based on the answers to the threshold questions, in conjunction with the below-referenced supplemental thresholds.

Impacts are considered significant if the project would result in any of the following:

1. Conflict with program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities
2. Conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b)
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves, dangerous intersections) or incompatible uses (e.g., farm equipment)
4. Result in inadequate emergency access

City of Santee Determination of Significance Under CEQA

To determine whether the proposed project would be consistent with CEQA Guidelines Section 15064.3(b), the significance thresholds from the City of Santee's *VMT Analysis Guidelines* (City of Santee 2022a), were used. Lead agencies have the discretion to establish their preferred significance thresholds to determine the level of VMT increase that would result in a significant environmental impact. Table 3.16-1 summarizes the significance thresholds for land use projects, as outlined in City of Santee's *VMT Analysis Guidelines* (City of Santee 2022a, Section 2.3.2).

Table 3.16-1. Significance Thresholds – City of Santee

Land Use	Metric	Threshold
Residential	VTM/Capita	15% below the City of Santee average VMT/Capita
General Employment	VTM/Employee	15% below the regional average VMT/Employee
Industrial Employment	VTM/Employee	At or below regional average VMT/Employee
Mixed Use	VTM/Capita and VTM/Employee	Each project component is evaluated per the appropriate metric based on land use type (e.g., residential, employment, and retail)
Regional Retail, Recreation, or Public Facilities	Total VMT	A net increase in total regional VMT using the boundary method

Source: City of Santee 2022a.

Note: VMT = vehicle miles traveled.

City of San Diego Determination of Significance Under CEQA

Table 3.16-2 summarizes the significance thresholds outlined in the Table 3 of the City of San Diego *Transportation Study Manual* (City of San Diego 2022).

Table 3.16-2. Significance Thresholds – City of San Diego

Land Use	Metric	Threshold ¹
Residential	VTM/Capita	15% below regional mean ² VMT per capita
Commercial Employment	VTM/Employee	15% below regional mean ² VMT per employee
Industrial and Agricultural Employment	VTM/Employee	Regional mean ² VMT per employee
Regional Retail	Total VMT	Zero net increase in total regional VMT ²
Hotel	Total VMT	See Commercial Employment
Regional Recreational	Total VMT	See Regional Retail
Regional Public Facilities	Total VMT	See Regional Retail
Mixed-Use	VTM/Capita VTM/Employee and Total VMT	Analyze each land use individually per above categories
Redevelopment	VTM/Capita VTM/Employee and Total VMT	Apply the relevant threshold based on proposed land use (ignore the existing land use)
Transportation Projects	Total VMT	Zero net increase in total regional VMT ²

Source: City of San Diego 2022 (Table 3).

Notes: VMT = vehicle miles traveled.

¹ Projects that exceed these thresholds would have a significant impact.

² The regional mean and total regional VMT are determined using the SANDAG Regional Travel Demand Model. The specific model version and model year will be identified by the Development Services Department's Transportation Development Section.

Construction

State CEQA Guidelines Section 15064.3(b)(3) notes that a lead agency may analyze a project's VMT qualitatively if existing models or methods are not available to estimate the VMT for the particular project being considered. State CEQA Guidelines Section 15064.3(b)(3) further notes that a qualitative construction analysis is appropriate for many projects. Accordingly, the analysis of VMT impacts associated with project construction is qualitative.

3.16.5 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the proposed project conflict with program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Impact Discussion

Impacts on the circulation system, including transit, roadway, bicycle, and pedestrian facilities, could occur if the proposed project were to conflict with the programs, plans, ordinances, or policies related to these facilities. Generally, policies in the City of Santee's *General Plan – Mobility Element* (City of Santee 2017) encourage a holistic, balanced, and interconnected multimodal approach to the 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. Project consistency with VMT thresholds for residential and commercial uses are discussed under Threshold 2, below.

Construction

During construction activities, construction vehicles would use the roadways that surround the project site to deliver materials and haul construction debris.

A traffic control plan (PDF-12A, Traffic Control Plan) will be prepared by the applicant and implemented during construction as required by the City of Santee and City of San Diego in accordance with the encroachment permit requirements. The primary function of a traffic control plan is to provide for the safe and effective movement of road users through or around temporary traffic control zones. The TCP ensures safe vehicular, pedestrian, and bicycle movements and for emergency vehicles. The City of Santee's Traffic Engineering Division reviews traffic control plans to balance the safety of construction workers with the need to minimize delays for drivers. Traffic control plans shall follow the Manual on Uniform Traffic Control Devices California Edition and the San Diego Regional Standard Drawings. These traffic management controls will include measures determined on the basis of site-specific conditions, including the use of construction signs, delineators, and lane closures. The TCP will include graphics illustrating the placement of signage, striping, traffic personnel, and road cones, as applicable.

Adherence to the traffic control plan (PDF-12A, Traffic Control Plan) would ensure that any changes to existing traffic flow patterns will be minimal and be limited to the surrounding project area. Therefore, the overall traffic circulation in the vicinity of the proposed project should not be affected. In addition, construction staging generally limits disruptions to the use of bicycle, pedestrian, or transit facilities. Therefore, construction activities would generally not impede nonmotorized travel or public transit in the vicinity of the proposed project. With the implementation of the traffic control plan, during construction the project would not conflict with program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Operation

Sidewalks, on-street parking, and Class II bicycle lanes are provided on both sides of Carlton Hills Boulevard. Sidewalks are available on both sides of Mast Boulevard, between the SR-52 eastbound ramps and West Hills Parkway, with the exception of the southern side of the roadway between the SR-52 eastbound ramps and the SR-52 westbound ramps. Class II bicycle lanes are provided in both directions. In addition, sidewalks and Class II bicycle lanes are available on both sides of Carlton Oaks Drive.

All new land uses that will be developed by the proposed project are located within the City of Santee. As required by the City of Santee's *General Plan*, the residential development areas were designed to be accessory to the primary recreational use (golf course). Residents would be able to access recreational and commercial uses at the country club and golf course via an interconnected system of golf cart paths, a multi-use path, and sidewalks that encourage pedestrian and bicycle access to these facilities. The proposed project would provide sufficient bicycle parking, in compliance with City of Santee standards. The proposed project would also provide bicycle amenities, such as internal trails and pathways, which would be 6–10 feet in width, with a mix of surface treatments consisting of decomposed granite and enhanced paving. The internal trails would provide connections from the proposed project to the existing regional bicycle facilities within the area.

The proposed project is not within 0.5 mile of a transit station; however, the closest transit line is the San Diego Metropolitan Transit System (MTS) Bus Route 834, which runs clockwise along Carlton Hills Boulevard (southbound direction), and Mast Boulevard (eastbound direction), providing transit services between the western neighborhoods of the City of Santee and the Santee Transit Center. MTS Bus Route 834 has an existing headway of 60 minutes throughout the day. No transit routes or services are currently available along Carlton Oaks Drive.

The operation and deployment of transit routes within the City of Santee is under the jurisdiction of the San Diego Metropolitan Transit System (MTS). Therefore, neither the City of Santee nor the project applicant have the authority to expand the transit network. Bus Route 834 stops at the intersection of Carlton Oaks Drive and West Hills Parkway, and MTS does not have plan to increase transit services or frequency.

Although the proposed project is not within 0.5 mile of a transit station, it is located directly adjacent to a Regional Mobility Hub, which is located to the east of the project site (see Figure A14 of SANDAG's 2021 Regional Plan). As described in SANDAG's 2021 Regional Plan Mobility hubs are centers of connectivity that allow for a high concentration of travel choices. Flexible fleets are shared, on-demand transportation services that provide convenient and personalized travel options, generally for short trips to neighborhood destinations such as schools, shopping, dining, parks, grocery stores, as well as connections to high-speed transit options. Future residents of the proposed project would have the ability to utilize these services within a short distance of the project site.

The proposed project is consistent with the relevant mobility policies outlined in the City of San Diego *Mobility Element*, as outlined in Table 3.16-3, as well as the analysis requirements outlined within their *Transportation Study Manual*, as shown in the *Draft Local Transportation Assessment*, May 6, 2025, prepared by Intersecting Metrics (Appendix O2). The proposed project also conducted a Systemic Safety Analysis, consistent with the City of San Diego *Systemic Safety: The Data-Driven Path to Vision Zero*. It should be noted that this analysis is based on collision data that was sampled throughout the City of San Diego and is intended to identify intersections that may have a higher potential for collisions to occur based upon nonlocational statistics. The analysis is solely based on the number of lanes at an intersection, the intersection control type, and the roadway volumes. This analysis does not account for, or provide any review of specific intersection design, signal timing, signage, travel speeds, sight distances, or collision history of the specific intersections. The analysis also does not project a specific probability for collisions to occur nor does it provide various tiers or degrees of severity. The analysis only identifies that the intersection has a similar number of lanes and traffic volume to other intersections within the City of San Diego that have experienced collisions in the past. As shown in Figure 8-1 of the *Draft Local Transportation Assessment*, May 6, 2025, prepared by Intersecting Metrics (Appendix O2), the intersections adjacent to the project site, located within the City of San Diego, have not experienced any pedestrian or bicycle collisions over the past 5 years (2020–2024). As such, there is no recent pedestrian or bicycle collision history or known safety issues at any of these study intersections. Even though there are no observed or documented safety issues at the intersections adjacent to the project site, the project has incorporated design features, as described in Table 3.16-3, that are based on

the countermeasures recommended in City of San Diego *Systemic Safety: The Data-Driven Path to Vision Zero* and coordination with City of San Diego Development Services staff.

As demonstrated in Table 3.16-3, the proposed project would not conflict with program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Table 3.16-3 summarizes the relevant policies from the adopted circulation plans that have been evaluated for consistency with the proposed project.

Table 3.16-3. Consistency Analysis with Relevant Circulation Policies

Goal, Policy, Objective	Proposed Project Consistency
Santee General Plan Mobility Element	
Policy 2.1: The City shall encourage an automobile LOS “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 Santee Town Center area. The City may approve a lower automobile LOS if it finds that the effectiveness of non-automotive components of the circulation system would be maintained or improved as a result.	Consistent. As discussed in the <i>Draft Local Transportation Assessment</i> , May 6, 2025, prepared by Intersecting Metrics (Appendix O2), all of the transportation study area roadway segments and intersections within the City of Santee are projected to operate at acceptable LOS D or better with the addition of the proposed project.
Policy 7.4: The City should require new development and redevelopment to provide connections to existing and proposed bicycle routes, where appropriate.	Consistent. As part of the proposed project, trail segments would be constructed on site to provide connections to the planned San Diego River Trail. On the eastern side of the project site, a trail would be provided, beginning at the entrance of Residential North at Carlton Oaks Drive, and connecting through the resort to a trail segment along the southeastern border of the project site (Figure 2-3, Proposed Site Plan, in Chapter 2, Project Description). The proposed trail and pathways through the site would vary in width from 6–10 feet, with a mix of surface treatments consisting of decomposed granite and enhanced paving. In the western portion of the site, the trail segment will be constructed beginning at the Santee jurisdictional line ending at the property line (Station 38+60) and link to the future planned trail known as the Carlton Oaks Golf Course Segment. A graded bench (located within the Carlton Oaks Golf Course Segment) would also be provided within the easement areas that will be granted to the applicant by the City of San Diego as a part of this project.
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	Consistent. As noted under Policy 7.4, the proposed project would provide a series of trails and pathways through the site. The trails and pathways would be separated from the vehicular roadway network and have landscaping. Along the project frontage, the proposed project would provide new public sidewalks along the eastern side of West Hill Parkway, which

Table 3.16-3. Consistency Analysis with Relevant Circulation Policies

Goal, Policy, Objective	Proposed Project Consistency
and services into both public and private developments.	would connect the proposed project to the West Hills Parkway and Carlton Oaks Drive bus stop. Finally, to provide safe intersections, the proposed project would design all project driveways to City of Santee or City of San Diego standards, depending on location.
City of San Diego Mobility Element	
Policy ME-A.4. Make sidewalks and street crossings accessible to pedestrians of all abilities. a. Meet or exceed all federal and state requirements. b. Provide special attention to the needs of children, the elderly, and people with disabilities. c. Maintain pedestrian facilities to be free of damage or trip hazards.	Consistent. Pedestrian improvements would be constructed to meet all code requirements to ensure accessibility to pedestrians of all abilities.
Policy ME-A.5. Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage. a. Minimize obstructions and barriers that inhibit pedestrian circulation. b. Consider pedestrian impacts when designing the width and number of driveways within a street segment.	Consistent. Pedestrian improvements would be constructed to meet all code requirements, including sidewalk widths and clear paths of travel. The proposed project would only add one new driveway location (along West Hills Parkway), which would be designed to the minimum allowable width to create the least impact on the pedestrian realm.
Policy ME-F.4. Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multifamily housing, schools and colleges, and transit facility uses. a. Continue to require bicycle parking in commercial and multiple unit residential zones. b. Provide bicycle facilities and amenities to help reduce the number of vehicle trips.	Consistent. All new land uses in which the proposed project will be developed are located within the City of Santee; thus, the City of Santee’s municipal code and development standards would apply to them. The proposed project would provide sufficient bicycle parking, in compliance with City of Santee standards. The proposed project would also provide bicycle amenities, such as internal trails and pathways, which would vary in width from 6–10 feet, with a mix of surface treatments consisting of decomposed granite and enhanced paving. The internal trails would provide connections from the proposed project to the existing regional bicycle facilities within the area.
Systemic Safety the Data-Driven Path to Vision Zero	
Study intersections should be compared to the City of San Diego <i>Systemic Safety: The Data-Driven Path to Vision Zero</i> report to determine if a study intersection meets any hotspot criteria identified in Appendix C: Identification of Systemic Hotspots of the report. If a study intersection meets any of the criteria, the applicant should evaluate any potential countermeasures and coordinate with the Development Services Department Transportation Development Section staff to determine appropriate intersection improvements. (City of San Diego 2022)	Consistent. A systemic hotspot analysis was conducted at all study area intersections located within the City of San Diego. The analysis is included in Section 8.0 of the <i>Draft Local Transportation Assessment</i> , May 6, 2025, prepared by Intersecting Metrics (Appendix 02). Systemic hotspots were identified at the West Hills Parkway and Mast Boulevard, West Hills Parkway and Carlton Oaks Drive, and West Hills Parkway and Mission Gorge Road intersections, even though there is no pedestrian or bicycle collision history or known safety issues at any of the intersections adjacent to the project site. In any regard, the project applicant coordinated with City of San Diego Development Services Department staff to

Table 3.16-3. Consistency Analysis with Relevant Circulation Policies

Goal, Policy, Objective	Proposed Project Consistency
	determine improvements at these intersections, which are included as project features (PDF-12B, Intersection Safety Improvements; provided in Chapter 2).
2021 Regional Plan (SANDAG)	
<p>Land Use and Regional Growth. The 2021 Regional Plan vision for land use focuses on development and growth in Mobility Hub areas to preserve the region's open space and support transportation investments by reducing vehicle miles traveled. SANDAG will consider how land use programs, projects, and policies it supports address social equity in relation to regional access to affordable housing, proximity to jobs and transit, opportunities for residents to live where they work and play, convenient access to multimodal transportation options, and other opportunities for work, commerce, and recreation.</p> <p>Land use is the foundation in determining what is built where and how transportation systems connect work, home, and recreation. Ensuring equitable development starts with considering equity in land use decisions and patterns. By coordinating equity, land use, and transportation, we can better understand where historically marginalized communities are located, how to better connect them with opportunities throughout the region, and enable residents to accomplish daily needs without traveling long distances, thereby contributing toward pollution exposure reduction. Because land use authority is reserved to local jurisdictions, SANDAG will leverage partnerships with cities and the county through the Smart Growth Incentive Program and other grants to provide funds for transportation-related improvements and planning efforts that support smart growth in Mobility Hubs to realize this vision.</p>	<p>Consistent Although SANDAG does not have land use authority within local jurisdictions, the Project would be consistent. The proposed project would be consistent with the City of Santee's <i>General Plan – Land Use Element</i> (City of Santee 2003a) and their Sixth Cycle (2021–2029) <i>Housing Element</i> (City of Santee 2022b). The City of Santee's <i>Housing Element</i> establishes a balance between the City of Santee's future employment and housing needs. The proposed project would develop the project site as a mixed-use, recreation-related development that would provide employment and recreational opportunities, as well as much-needed housing. Additionally, the proposed project would be consistent with the City of Santee's <i>General Plan – Conservation Element</i> (City of Santee 2003b), which protects sensitive habitats, cultural resources, and resource areas within the City of Santee. The golf course would retain more than 24 acres of existing natural areas on the site, which would remain untouched. Several riparian areas throughout the project site would be planted with native riparian grasses, reeds, and shrubs to provide an environment for native birds, small animals, and aquatic plant and animal species. The proposed project would be located directly adjacent to a Regional Mobility Hub, which is located to the east of the project site (see Figure A14 of SANDAG's 2021 Regional Plan) and includes strategies to reduce VMT, as described below. By incorporating residential uses in the Carlton Oaks Country Club redesign, residents would be able to enjoy recreation where they live. Residents would be able to access the recreational and commercial uses at the Carlton Oak Country Club and golf course by a multiuse path and sidewalks designed for pedestrian and bicycle use. These measures would help to reduce the overall number of vehicular trips and VMT created by the proposed project, particularly during peak travel times.</p>
<p>Parking and Curb Management. Proactively managing parking and curb space enables more people to access places within our communities using alternatives to driving. Effective parking-management policies contribute to the region's ability to meet the California Senate Bill 375 (Steinberg 2008) greenhouse gas reduction targets by applying parking</p>	<p>Consistent. As outlined in Table 3.16-6 (see TDM Measures 1A, 1D, 1E, 3A, and 3B), the proposed project would implement multiple parking management strategies including parking cash out for employees, transit pass subsidies, a vanpool program, and paid parking for hotel patrons. Additionally, the golf clubhouse and hotel/cottages portion of the</p>

Table 3.16-3. Consistency Analysis with Relevant Circulation Policies

Goal, Policy, Objective	Proposed Project Consistency
<p>pricing and reduced parking supply assumptions. In addition, the 2021 Regional Plan addresses curb management by proposing strategies to help balance competing and changing travel needs at the curb while remaining flexible to resident, employee, business, and visitor needs. While the authority to implement parking and curb policies remains with local jurisdictions, SANDAG plays a unique role of informing these policies by sharing resources and best practices and serving as the regional Mobility Data Clearinghouse. Proactively managing parking and curb space enables more people to access places within our communities using alternatives to driving.</p> <p>SANDAG considers how parking and curb management can address social equity and how all residents in the San Diego region can benefit from its potential impacts. Such policies can enable affordable housing development and create equitable curb space for all travelers, including those who depend on modes like transit, biking, or other Flexible Fleets. These alternatives to driving alone not only enable less required parking but can also reduce pollution exposure as trips are shifted to cleaner modes. SANDAG will ensure that pricing strategies are implemented in coordination with more convenient and accessible travel choices and mobility incentive programs as they become available.</p>	<p>project would implement a shared parking plan to minimize the need for additional parking spaces provided on site. It should be noted that access to the specific uses within the proposed project (e.g., hotel, golf course, residential units) would occur via internal roadways that would not have on-street parking. Finally, the proposed project would not rely on public on-street parking; therefore, curb-management policies and practices are not relevant to the proposed project.</p>
<p>Transportation Demand Management. TDM innovations have the potential to transform the way people travel within and between communities. Managing demands on the existing transportation system is a vital strategy for making the overall system more effective in reducing solo commute trips. SANDAG will continue to administer and monitor the iCommute program by providing regional rideshare, employer outreach, bike education, and secure parking services to help reduce commute-related traffic congestion and vehicle miles traveled. Beyond commute trips, TDM programs are expanded to include grants and incentives that make it easier and safer to use active modes for short trips.</p> <p>SANDAG recognizes that all residents throughout the region deserve convenient, safe, and affordable commute options and will ensure equitable distribution of funding and incentive program assistance. Additionally, SANDAG commuter programs will design options for low-income or unbanked residents while ensuring marketing, outreach, and</p>	<p>Consistent. As outlined in Table 3.16-6 (see TDM Measures 1A, 1D, 1E, 4E, and 4G), the proposed project would subsidize transit passes for its employees, provide a bike share program for hotel guests, implement and incentivize a vanpool program for employees, and implement a community-based travel plan for its residents. The proposed project would also participate in SANDAG's iCommute program to assist project residents and employees with ride sharing for their commute. These programs are all designed to encourage carpooling and help achieve the mode split goals outlined in the <i>2021 Regional Plan</i>.</p>

Table 3.16-3. Consistency Analysis with Relevant Circulation Policies

Goal, Policy, Objective	Proposed Project Consistency
education efforts reach underrepresented populations in the region.	
Greater participation in TDM programs have great potential for pollution exposure reduction by reducing the number of single-occupant vehicles.	

Notes: LOS = level of service; SANDAG = San Diego Association of Governments; TDM = transportation demand management; VMT = vehicle miles traveled.

As outlined in Table 3.16-3, the proposed project would not conflict with any of the transportation based goals/policies contained in the 2021 Regional Plan.

As discussed above, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.

Impact Determination

Implementation of the proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of a circulation system. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would implementation of the proposed project conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b)?

Impact Discussion

Operations

Trip Generation

As shown previously in Tables 3.16-1 and 3.16-2, the method used to derive and evaluate project VMT is determined based on the proposed project's trip generation. Trip generation rates for the proposed project were developed utilizing SANDAG's *(Not So) Brief Guide to Vehicular Traffic Generation Rates for the San Diego Region* (SANDAG 2002). As noted in the project description, the golf course and its associated ancillary uses (i.e., pro shop, cart barn, learning center, and practice areas) are existing uses. Therefore, these uses are not included in the proposed project trip generation because they would not change in nature, and any trip generation associated with these uses would be accounted for under baseline conditions.

Conversely, an existing 52-room hotel is located on the project site; however, the existing hotel would be fully redeveloped to include a new clubhouse, with amenities such as a spa, pool, and tournament hall. Because the

hotel is being redeveloped and would include new amenities, it is not assumed to be included within the baseline, and its full trip generation was assumed. Table 3.16-4 displays daily, morning peak hour (AM), and evening peak hour (PM) project trip generation. As shown in Table 3.16-4, the proposed land uses are anticipated to generate a total of 2,836 average daily trips (ADT) with 193 trips (53 in/140 out) during the AM peak hour and 267 trips (182 in/85 out) during the PM peak hour. As per the recommendation stated in the Regional TIS Guidelines (Appendix O1), a VMT/Capita and VMT/Employee analysis was conducted for the project site using the SANDAG Series 14 Model, which incorporates a tour-based approach when calculating and evaluating VMT.

Table 3.16-4. Project Trip Generation

Land Use	Units	Trip Rate	ADT	AM					PM				
				%	Trips	Split	In	Out	%	Trips	Split	In	Out
Multifamily (6–20 DU/acre) ¹	236 DU	8/DU	1,888	8%	152	(2:8)	30	122	10%	189	(7:3)	132	57
Single-Family Detached Housing ²	6 DU	10/DU	60	8%	5	(3:7)	2	3	10%	6	(7:3)	4	2
Hotel (with Convention Facilities/Restaurant) ³	52 Room	10/Room	520	6%	32	(6:4)	19	13	8%	42	(6:4)	25	17
Restaurant (Quality) ⁴	3,675 SF	100/KSF	368	1%	4	(6:4)	2	2	8%	30	(7:3)	21	9
Total	—	—	2,836⁵	—	193	—	53	140	—	267	—	182	85

Source: Appendix O1

Notes: ADT = Average Daily Traffic; AM = morning hours; DU = dwelling units; KSF = thousand square feet; PM = evening hours; SF = square feet.

- ¹ Includes the 86 multifamily dwelling units in Residential West and the 150 multifamily dwelling units in Residential North. The density of the residential units is 9 units per acre in Residential West and 8.1 units per acre in Residential North. Therefore, the residential trip generation rate for units with a density between 6–20 units per acre was used.
- ² The project site plan shows seven single-family units; however, one unit currently exists; therefore, it is not included in the proposed project trip generation.
- ³ The proposed hotel use is anticipated to include a 4,800-square-foot tournament hall that could be used to host special events and other public functions. Other clubhouse features, such as the proposed spa and pool, are also assumed within the hotel's trip generation. To account for the additional trips associated with the tournament hall, the San Diego Association of Governments trip generation rate for a hotel with convention facilities/restaurant was assumed.
- ⁴ Typically, restaurant uses associated with hotel sites are accounted for within the hotel's trip generation rate. However, due to the limited number of hotel rooms, the proposed restaurant was analyzed separately, even though this use is generally included within the hotel (with conversion facilities/restaurant) land use.
- ⁵ Note that these are project only trips and do not incorporate trips from existing uses that will remain.

VMT Analysis Results (City of Santee)

The results of the SANDAG Series 14, Year 2016 (ABM 2 +) base year forecast are provided in Table 3.16-5.

Table 3.16-5. Vehicle Miles Traveled Analysis Results Impact Analysis

Metric	City of Santee		City of San Diego	
	Residential Uses VMT/Capita (miles/person)	Commercial Uses VMT/Employee (miles/person) ⁴	Residential Uses VMT/Capita (miles/person)	Commercial Uses VMT/Employee (miles/person) ⁴
City of Santee/Regional Average	20.8 ¹	18.9 ²	18.9 ³	18.9 ²
Significant Impact Threshold	17.7	16.1	16.1	16.1
Proposed Project	22.8	19.3	22.8	19.3
Proposed Project vs. Significant Impact Threshold	5.1 miles 22.4% over	3.2 miles 16.6% over	6.7 miles 29.4% over	3.2 miles 16.6% over
Significant Impact?	Yes	Yes	Yes	Yes

Notes: Employee VMT data is not available for proposed project's census tract; therefore, used an adjacent tract east of the project that includes Town Square and has a higher VMT/Employee, which provides a more conservative analysis.

¹ City of Santee VMT/Capita average source: SANDAG Series 14 Year 2016 Model (Scenario ID 458).

² San Diego Regional VMT/Employee average source: SANDAG Series 14 Year 2016 ABM 2+ Model (Scenario ID 458). Note, the census tract the proposed project is located in Census Tract 166.06 does not currently have a large enough sample of employees to calculate VMT/Employee. Therefore, the proposed project's VMT/Employee was derived from the census tract located directly to the east (166.14).

³ San Diego Regional VMT/Capita average source: SANDAG Series 14 Year 2016 ABM 2+ Model (Scenario ID 458).

⁴ City of Santee/Regional Average × 85%.

Impact Determination

Implementation of the proposed project would have the potential to be inconsistent with State CEQA Guidelines Section 15064.3(b)(1). Potentially significant impacts include the following:

Impact TRA-1: Generate Vehicle Miles Traveled in Exceedance of Thresholds for Residential Uses.

As shown in Table 3.16-5, the proposed project's residential uses are anticipated to generate a VMT/Capita of 22.8 miles/person, which is 5.1 miles (22.4%) over the City of Santee's significance threshold (17.7 miles/person) and the City of San Diego's threshold (16.1). Therefore, the residential uses within the proposed project would have a significant transportation VMT impact under both jurisdictional thresholds.

Impact TRA-2: Generate Vehicle Miles Traveled in Exceedance of Thresholds for Commercial Uses.

The proposed project's commercial uses are anticipated to generate a VMT/Employee of 19.3 miles, which is 3.2 miles/employee (16.6%) over both the City of Santee's and the City of San Diego's thresholds (16.1 miles/employee). Therefore, the commercial uses within the proposed project also would have a significant transportation VMT impact under both jurisdictional standards.

Construction

A maximum of 210 construction workers daily would access the site during the peak of construction. Additionally, construction activities are anticipated to generate a maximum of 111 haul truck trips per day to transport miscellaneous material, soil import, and equipment at the beginning of the construction period, with minimal truck trips occurring after the initial import period. It should be noted that only nine construction workers are anticipated to be on site during the initial haul periods when truck trips are at their highest.

Project construction activities would be temporary in nature; and thus, would not result in long-term increases in vehicular trips. It is anticipated that construction workers would be drawn primarily from existing residents of the Cities of San Diego and Santee as well as and surrounding unincorporated areas. As such, construction worker VMT associated with the proposed project would not be newly generated, but rather would be redistributed throughout the regional roadway network based on the different work sites to which workers travel to each day.

Therefore, based on the legislative intent of SB 743, which focuses on long-term VMT reductions through land use planning and smart growth, the temporary and limited generation of vehicular and truck VMT from the project's construction is not expected to substantially increase VMT in the region such that it could contribute to long-term adverse environmental effects from increases in greenhouse gas and criteria pollutant emissions, or hinder the promotion of multimodal transportation systems or implementation of clean, efficient access to destinations. Additionally, OPR's Technical Advisory advises that SB 743's intent is to plan for "long term climate goals." As such, projects with temporary effects on VMT (both construction worker and truck trips) and the transportation system are not deemed to be significant. Therefore, the proposed project's construction-related VMT impacts would be less than significant.

Mitigation Measures

MM-TRA-1. Implement TDM Measures. To reduce project-related vehicle miles traveled (VMT), the project applicant will implement the following Traffic Demand Management (TDM) measures included in the Mobility Management VMT Reduction Calculator Tool.

- **Voluntary Employer Commute Program:** The project applicant will prepare and implement a TDM plan for which their employees volunteer to participate. The TDM plan may include measures such as the following.
 - Enroll in the San Diego Association of Governments' (SANDAG) iCommute Program.
 - Provide ride-match assistance to employees for carpooling (Strategy 1C).
 - Implement a vanpool program and subsidies (Strategy 1E).
 - Inform employees about the different resources available to reduce their commute trips.
 - Subsidize transit passes for employees who elect to take transit to work (Strategy 1D).
 - Provide on-site bicycle racks and showers for employees who elect to ride their bicycle to work.
- **Employer Carpool Program:** The hotel and restaurant will implement an employer carpool-assistance program for their employees. Additionally, the HOA will also implement a similar program for residents.
- **Employer Transit Pass Subsidy:** The project applicant will provide transit-pass subsidies for employees who elect to take transit to work. However, due to the limited transit service accessing the proposed project site (Route 834), no reduction is assumed for this strategy.

- **Employer Vanpool Program:** The project applicant will coordinate with SANDAG's iCommute program to implement a vanpool program, if feasible for an identified group of employees.
- **Parking Pricing:** The hotel component of the project will charge a parking fee, which will be included in the resort fee. Hotel patrons will be provided with a rebate if they did not use a personal or rented vehicle to access the hotel.
- **Parking Cash Out:** The resort employees will be incentivized not to drive to work as a single driver and will be provided a TDM reward payment (amount to be determined later) for driving with a carpool group (i.e., three people or more).
- **Bicycle Share:** The proposed project will provide a bicycle-share service to hotel guests. Guests will be able to check out communal bicycles from the front desk or clubhouse of the hotel, which will allow guests to ride to different parts of the city, such as the Town Center or along the San Diego River Trail. However, this strategy will not be applicable toward VMT reduction because this measure is intended to be a citywide measure to be effective.
- **Community-Based Travel Planning:** It is assumed that the proposed project's HOA will provide information about alternative modes of transportation to residents and tenant as a part of their New Resident or New Tenant package. The HOA will also provide residents with transit schedules within the area and alert residents when new transit services are added or new services are charged. The HOA will also act as Travel Advisor, providing new residents and tenants with information regarding how members of households can travel in alternative ways that meet their needs.

The TDM measures included in SANDAG's Mobility Management VMT Reduction Calculator Tool (Appendix B of the TIS [Appendix O1]) were the measures that were considered to be used as proposed project mitigation because they are the measures recognized and called out by both the *City of Santee VMT Analysis Guidelines* (City of Santee 2022a) and the *City of San Diego Transportation Study Manual* (City of San Diego 2022) and thus have been calibrated and quantified specifically to the San Diego region. It should be noted that the Mobility Management VMT Reduction Calculator Tool does not include every potential TDM measure that could potentially reduce proposed project-related VMT. Moreover, the effectiveness and methods to calculate VMT reductions for TDM measures not included within the tool have not been recognized or agreed on by the region and may be subject to challenge. Therefore, these measures were not considered as mitigation strategies, and reductions were not taken due to the lack of substantial evidence to support their effectiveness.

Table 3.16-6 reviews each of the TDM measures included in the Mobility Management VMT Reduction Calculator Tool, identifies whether the TDM measure would be feasible for the project to implement, and quantifies the potential reduction in VMT that the proposed project would experience with the implementation of the measure. The purpose of this assessment is to calculate the potential reduction in proposed project VMT that is feasible through quantifiable and accepted TDM measures. If the proposed project were not able to reduce its VMT/Capita by 22.4% for the City of Santee and 29.4% for the City of San Diego, as well as its VMT/Employee by 16.1% for both jurisdictions (see Table 3.16-7), then its impacts would remain significant and would become unavoidable.

Table 3.16-6. Potential Transportation Demand Management and Vehicle Miles Traveled Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
1A. Voluntary Employer Commute Program	<p>Employer offers a voluntary employer commute trip-reduction program. The program may include a carpool or vanpool program, subsidized or discounted transit passes, bicycle amenities, commute trip-reduction marketing, and/or a preferential parking-permit program. This strategy encompasses strategies 1C (Employer Carpool Program), 1D (Employer Transit Pass Subsidy), and 1E (Employer Vanpool Program) and cannot be analyzed in combination with these strategies. Unlike Strategy 1B (Mandatory Employer Commute Program), this strategy does not require monitoring, reporting, or performance standards. If this strategy were selected, then Strategy 1B could not be analyzed as part of the total VMT reduction.</p>	<p>Yes. The project applicant would prepare and implement a TDM plan for which their employees volunteer to participate. The TDM plan would include the following measures:</p> <ul style="list-style-type: none"> ▪ Enroll in SANDAGs iCommute Program. <ul style="list-style-type: none"> - Provide ride-match assistance to employees for carpooling (Strategy 1C). - Implement a vanpool program and subsidies (Strategy 1E). - Inform employees about the different resources available to reduce their commute trips. ▪ Subsidize transit passes for employees who elect to take transit to work (Strategy 1D). ▪ Provide on-site bicycle racks and showers for employees who elect to ride their bicycle to work. 	0.70%
1B. Mandatory Employer Commute Program	<p>Employer offers a mandatory employer commute trip-reduction program. The program may include a carpool or vanpool program, subsidized or discounted transit passes, bicycle amenities, encouragement for telecommuting and alternative work schedules, commute trip \-reduction marketing, and/or a preferential parking-permit program.</p> <p>This strategy encompasses Strategies 1C, 1D, and 1E and cannot be analyzed in combination with these strategies. Unlike strategy 1A (Voluntary Employer Commute Program), this strategy would be contractually required of the developer or property owner and accompanied by a regular performance-monitoring and reporting program. If this strategy were selected, then Strategy 1A could not be analyzed as part of the total VMT reduction.</p>	<p>N/A. The proposed project is electing to implement a Voluntary Employer Commute Program (Strategy 1A). The measures outlined within this strategy are included in within Strategy 1A; however, it would be voluntary for employees to participate.</p>	N/A

Table 3.16-6. Potential Transportation Demand Management and Vehicle Miles Traveled Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
1C. Employer Carpool Program	Employers can encourage carpooling by providing ride-matching assistance to employees, priority parking for carshare vehicles, and incentives for carpooling.	Yes. The hotel and restaurant would implement an employer carpool-assistance program for their employees. Additionally, the HOA would also implement a similar program for residents.	Included as part of Strategy 1A
1D. Employer Transit Pass Subsidy	Employers can encourage employees to take transit by offering subsidized or discounted daily or monthly public transit passes to employees.	Yes. The project applicant would provide transit-pass subsidies for employees who elect to take transit to work. However, due to the limited transit service accessing the project site (Route 834), no reduction is assumed for this strategy.	0.0%
1E. Employer Vanpool Program	<i>Vanpooling</i> is a flexible form of public transportation that provides groups of 5–15 people with a cost-effective and convenient rideshare option for commuting. An employer can encourage ridesharing by subsidizing vanpooling for employees that have similar origins and destinations and by providing priority parking for employees that vanpool. The SANDAG Vanpool Program provides a subsidy of up to \$400 per month to offset the vehicle lease cost.	Yes. The project applicant would coordinate with SANDAG's iCommute program to implement a vanpool program, if feasible for an identified group of employees.	Included as part of Strategy 1A
1F. Employer Telework Program	A telework program enables employees to work from home or a remote location on a periodic basis. Depending on the nature of the work, schedules can range from full-time, specific days of the week, or as-needed. The VMT impacts of telework are similar to a flexible work-schedule program, which enables employees to work long hours in exchange for 1 day off every week or two.	No. The majority, if not all, of the jobs that are anticipated to be offered within the project site would be service-based; therefore, there would be limited opportunity for teleworking. However, positions that could potentially telework would be provided that opportunity.	N/A
2A. Transit-Oriented Development	<i>Transit-oriented development</i> refers to projects built in compact, walkable areas that have easy access to public transit, ideally in a location with a mix of uses, including housing, retail, offices, and community facilities. Transit-oriented developments are generally described as places within a 10-minute walk of a high-frequency rail transit station (e.g. SPRINTER, COASTER, Trolley). These developments should, at a minimum, incorporate bicycle	N/A. The proposed project is not within 0.5 mile of a transit station.	N/A

Table 3.16-6. Potential Transportation Demand Management and Vehicle Miles Traveled Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
	and pedestrian access to transit, thereby encouraging transit use and reducing vehicle travel.		
2B. Mixed-Use Development	Mixed-use projects incorporate a range of complementary land uses that provide a balanced developmental approach relative to the surrounding neighborhood and encourage transportation alternatives. This could include co-location residential development, office space, retail shops, and others. Land use mix is measured using an entropy index: an index of 0 indicates a single land use, and an index of 1 indicates equal distribution of all land uses. For ease of use, the strategy is calculated using only two land use types, residential (i.e., number of residents) and commercial (i.e., number of jobs).	Yes. However, the mixed-use reductions associated with this measure should be accounted for in the SANDAG model. Therefore, any further reduction could potentially result in double counting of the effect of the mixed-land uses. It should be noted that pathways would be provided on which project residents could drive electric golf carts to the commercial areas within the proposed project.	0.0%
3A. Parking Pricing	Priced parking can be implemented on- or off-street and helps to effectively manage the parking supply. Priced parking works best in areas where on-street parking is managed (e.g., with priced parking, residential permit programs, time limits) to reduce unintended consequences of parking in adjacent neighborhoods.	Yes. The hotel component of the project would charge a parking fee, which would be included in the resort fee. Hotel patrons would be provided a rebate if they did not use a personal or rented vehicle to access the hotel.	7.5% ¹
3B. Parking Cash Out	Employers can offer employees who are provided free parking the option to take the cash value of the space in lieu of the space itself. California State Law (AB 2109, Katz) requires that certain employers who provide subsidized parking for their employees offer a cash allowance in lieu of a parking space. This strategy is only applicable where employers pay for or rent parking for their employees. Parking cash-out is most successful when paired with incentives or programs that encourage the use of transportation alternatives.	Yes. The resort employees would be incentivized not to drive to work as a single driver and would be provided a TDM reward payment (amount to be determined later) for driving with a carpool group (i.e., three people or more).	2.4% ²
4A. Street Connectivity Improvement	A connected and complete street network improves accessibility, safety, and livability of the community. Traditional grid street patterns with short blocks offer a high degree of connectivity compared to street networks	No. The proposed project would construct new internal private roadways; however, these roadways are intended for project access and would not	N/A

Table 3.16-6. Potential Transportation Demand Management and Vehicle Miles Traveled Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
	with curvilinear designs and cul-de-sacs. This strategy uses intersection density as a proxy for street connectivity improvements, which helps facilitate a greater number of short trips. Examples of projects that increase intersection density would include building a new street network in a subdivision or retrofitting an existing street network to improve connectivity (e.g., cul-de-sacs converted to grid streets).	enhance the connectivity of the external public street network.	
4B. Pedestrian Facility Improvement	Enhancing pedestrian facilities (e.g., streetscape and pedestrian crossing improvements) within the jurisdiction or community helps encourage walking and reduce reliance on single-occupancy vehicles. This strategy applies to sidewalk enhancements that improve the existing streetscape and is not inclusive of greenfield developments with new roadways.	N/A. This measure would not apply because the public sidewalks near the proposed project are already constructed to applicable standards; therefore, the project cannot take advantage of this reduction.	N/A
4C. Bicycleway Network Expansion	A bicycleway network includes an interconnected system of bicycle lanes, bicycle paths, and cycle tracks (i.e., Class I, Class II, and Class IV facilities). Bicycle facilities may share the roadway with vehicles or provide a dedicated pathway that separates bicycles from cars or pedestrians. Increasing the network of bicycle facilities helps encourage biking as a safe and convenient alternative to driving. If this strategy were selected, then Strategy 4D (Bicycle Facility Improvement) could not be analyzed as part of the total VMT reduction.	N/A. Policy 7.4 of Santee's <i>General Plan – Mobility Element</i> requires new development to provide connections to existing and proposed bicycle routes, where appropriate. The proposed project's design would account for and provide connections, as appropriate, to proposed bicycle routes identified in the <i>Santee General Plan Mobility Element</i> located adjacent to the project site. As part of the proposed project, trail segments would be constructed on site to provide connections to the future San Diego River Trail. The proposed trail and pathways through site would vary in width from 6-10 feet with a mix of surface treatments consisting of decomposed granite and enhanced paving. However, because of the current transportation mode splits in the areas around the proposed project, improvements to the adjacent bicycle network are not projected to have a substantial effect on the proposed project VMT; thus, it would not be viable mitigation.	N/A

Table 3.16-6. Potential Transportation Demand Management and Vehicle Miles Traveled Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
4D. Bicycle Facility Improvement	If a comprehensive bicycleway network expansion (Strategy 4C) were not feasible, then the addition of a single bicycle lane (Class II), bicycle path (Class I), or protected bicycleway (Class IV) to an existing bicycleway network helps to improve cycling conditions within an area. Class I facilities are bicycle paths that are physically separated from motor vehicle traffic, Class II facilities are striped bicycle lanes that provide exclusive use to bicycles on a roadway, and Class IV facilities are protected on-street bicycleways, also called <i>cycle tracks</i> . Consider local or state bicycle width standards when implementing facility improvements. If this strategy were selected, then Strategy 4C (Bicycleway Network Expansion) could not be analyzed as part of the total VMT reduction.	N/A. Bicycle facility improvements are already assumed under Strategy 4C.	See 4C
4E. Bicycle Share	Bicycle share programs help reduce traffic congestion and demand for parking by providing users with on-demand access to bicycles for short-term rental. Bicycle share systems that feature electrified vehicles (e.g., scooters, e-bicycles) help increase the range of the bicycle trip, making these services convenient and attractive to users. Providing discounted bicycle share memberships or dedicated bicycle-share parking can encourage users and improve the user experience.	Yes. The proposed project would provide a bicycle-share service to hotel guests. Guests would be able to check out communal bicycles from the front desk or clubhouse of the hotel, which would allow guests to ride to different parts of the Cities of San Diego, and Santee such as the Town Center or along the San Diego River Trail. However, this strategy would not be applicable toward VMT reduction because this measure is intended to be a citywide measure to be effective.	0.0%
4F. Carshare	Carsharing offers people convenient access to a vehicle for personal or commuting purposes and helps encourage transportation alternatives by reducing vehicle ownership. Roundtrip carshare providers require members to return the vehicle to a designated location. One-way carshare (i.e., free-floating) providers allow members to pick up the vehicle in one place and end their trip in another. Discounted carshare memberships	No. No public carshare programs are currently available within the City of Santee. However, should a carshare company want to locate a carshare on the property, the proposed project could accommodate the service for its guests, residents, and employees.	N/A

Table 3.16-6. Potential Transportation Demand Management and Vehicle Miles Traveled Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
	and priority parking for carsharing vehicles help encourage use of carsharing services.		
4G. Community-Based Travel Planning	Community-based travel planning is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives. The approach involves a team of trained Travel Advisors, who engage residents at home or in their communities for the purpose of offering information, incentives, and advice about how members of households can travel in alternative ways that meet their needs. Teams of trained Travel Advisors visit all households within a targeted geographic area, have tailored conversations about residents' travel needs, and educate residents about the various transportation options available to them. Due to the personalized outreach method, communities are typically targeted in phases.	Yes. The proposed project's HOA would provide information about alternative modes of transportation to residents and tenant as a part of their New Resident or New Tenant package. The HOA would also provide residents with transit schedules within the area and alert residents when new transit services are added or new services are charged. The HOA would also act as Travel Advisor, providing new residents and tenants with information regarding how members of households can travel in alternative ways that meet their needs.	2.0%
5A. Transit Service Expansion	Expanding the transit network increases the transit system's ability to accommodate existing and future travel demand, particularly for peak-period commute trips. This strategy provides an effective alternative to congested freeways and roadways for travelers and can reduce VMT by increasing transit ridership. Transit network service improvements should be coordinated closely with the operating transit agency.	No. The operation and deployment of transit routes within the City of Santee is under the jurisdiction of the San Diego Metropolitan Transit System (MTS). Therefore, neither the City of Santee nor the project applicant have the authority to expand the transit network. Bus Route 834 stops at the intersection of Carlton Oaks Drive and West Hills Parkway, and MTS does not have plan to increase transit services or frequency.	N/A
5B. Transit Frequency Improvements	Transit-frequency improvements can be implemented systemwide or on individual routes. Frequency improvements increase transit ridership by reducing travel times, which improves the user experience and increases the attractiveness of transit service. Transit network-service improvements should be coordinated closely with the operating transit agency.	No. The operation and deployment of transit routes within the City of Santee is under the jurisdiction of MTS. Therefore, neither the City of Santee nor the project applicant have the authority to change the frequency of transit routes within Santee.	N/A

Table 3.16-6. Potential Transportation Demand Management and Vehicle Miles Traveled Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
5C. Transit-Supportive Treatments	Roadway-infrastructure and/or traffic-signal modifications can improve transit travel times and reliability, leading to modal shift to transit. Treatments can include transit-signal priority, bus-only signal phases, queue jumps, curb extensions to speed passenger loading, and dedicated bus lanes. Transit-supportive treatments should be coordinated closely with the operating transit agency.	No. Because no regional transit lines access the project site, any transit-supportive treatments implemented within the area would have minimal to no effect on project-related VMT.	N/A
5D. Transit-Fare Reduction	Transit-pricing strategies are designed to reduce the costs associated with using transit, thereby creating incentives for people to shift from other traveling modes. Fare reductions can be implemented systemwide or in specific fare-free or reduced-fare zones. This strategy varies from Employer Transit Pass Subsidy (Strategy 1D), which can be offered through employer-based benefits programs in which the employer fully or partially pays the employee's cost of transit.	No. The operation and deployment of transit routes within the City of Santee is under the jurisdiction of MTS. Therefore, neither the City of Santee nor the project applicant have the authority to change transit fares.	N/A

Source: Appendix O1.

Notes: HOA = Homeowner's Association; MTS = San Diego Metropolitan Transit System; SANDAG = San Diego Association of Governments; TDM = Transportation Demand Management; VMT = Vehicle Miles Traveled.

¹ Note this reduction would only apply to the hotel guests and would not reduce the VMT per Capita or VMT per employee for the project site.

² Assumes 20% of employees would be eligible to participate in the program (based on estimation from the project applicant).

Level of Significance After Mitigation

As shown in Table 3.16-4, the proposed project's residential uses and commercial uses would result in a significant VMT impact. The proposed project would be located directly adjacent to a Regional Mobility Hub and would implement **MM-TRA-1**, which includes TDM measures to reduce VMT, as listed in Table 3.16-5 above. As outlined in the project's *Transportation Impact Study* (Appendix O1) (see TDM Measures 1A, 1D, 1E, 4E, and 4G), the proposed project would subsidize transit passes for its employees, provide a bicycle-share program for hotel guests, implement and incentivize a vanpool program for employees, and implement a community-based travel plan for its residents. By incorporating residential uses in the Carlton Oaks Country Club redesign, residents would be able to enjoy recreation where they live. Residents would be able to access the recreational and commercial uses at the Carlton Oak Country Club and golf course by a multiuse path and sidewalks designed for pedestrian and bicycle use.

The total VMT reduction associated with the measures listed above would be 3.1% for employment-related VMT and 2.0% for residential-related VMT. As identified in Table 3.16-4, the proposed project would have to reduce its VMT/Capita by 22.4% (Santee) and 29.4% (San Diego) as well as its VMT/Employee by 16.6% (both jurisdictions) to reduce the project-related impacts to less than significant. Table 3.16-7 summarizes the proposed project's anticipated VMT with the implementation of the TDM plan.

Table 3.16-7. Proposed Project VMT with TDM Plan

Impact Type	Proposed Project VMT	Reduction with TDM Plan	Proposed Project VMT with TDM	VMT Threshold	Impact Mitigated?
VMT/Capita (Santee)	22.8	2.0%	22.3	17.7	No
VMT/Capita (San Diego)	22.8	2.0%	22.3	16.1	No
VMT/Employee (Both)	19.3	3.2%	18.7	16.1	No

Source: Appendix O1

TDM = Transportation Demand Management; VMT = Vehicle Miles Traveled.

As shown, implementation of the TDM measures listed in Table 3.16-6 would not reduce project-related impacts (**Impact TRA-1** and **Impact TRA-2**) to less-than-significant levels. As discussed previously, these TDM measures were the only measures that were considered viable as proposed project mitigation because they are the measures recognized and available under the *City of Santee VMT Analysis Guidelines* (City of Santee 2022a) and the *City of San Diego Transportation Study Manual* (City of San Diego 2022). In addition, they are the only measures that have been calibrated and quantified specifically to the San Diego region. Since all quantifiable TDM measures that are recognized by the City of Santee have been exhausted, the proposed project would have **significant** and **unavoidable** transportation-related impacts, as no additional feasible mitigation measures could be identified.

Threshold 3: Would implementation of the proposed project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Discussion

The project would provide a system of internal private roads (generally two-laned) with access to the regional network via two driveways from West Hills Parkway (San Diego) and Carlton Oaks Drive (Santee) (see Figure 2-3, Proposed Site Plan, in Chapter 2). The project would maintain adequate corner sight distance at all public-access points (i.e., driveways), as per the California Department of Transportation (Caltrans) *Highway Design Manual* (citation needed). Moreover, neither of the driveway intersections meet signal warrants for signalization of the

intersections. Both driveways would operate at acceptable LOS D or better under the Horizon Year 2035 with project conditions.

The proposed internal private roads would be constructed according to the City of Santee standards and include a minimum of 26-foot widths throughout with the exception of the private streets, which provide direct vehicular access to each of the cluster units of four units or fewer. The private cul-de-sac roads would be 20 feet in width, as allowed by the exceptions to California Fire Code Section 503.2.1. The internal roadways would also be designed to maintain a lower travel speed of 10 mph to maintain safer conflict points with other modes of travel. Finally, adequate stopping-sight distance would be maintained along all sections of the private internal roadways, as per the Caltrans *Highway Design Manual*.

The City of Santee Fire Chief has determined that the 20-foot standards as set forth in the Development Standards would not impair or impede adequate emergency fire department access to the project site. Fire department apparatus access would comply with the requirements of the 2022 or most recently adopted California Fire Code, City of Santee Ordinance No. 570, and City San Diego Municipal Code Section 511.0101. Interior residential streets would be designed to accommodate a minimum of a 77,000-pound fire truck. The internal private streets would be maintained by the Homeowner's Association (HOA) and open to the public visiting residents or the golf course resort facilities, making deliveries, and participating in community activities.

The project applicant has also provided conceptual design plans to the City of San Diego for the proposed driveway as well as a new southbound left-turn pocket located on West Hills Parkway. Additionally, the project applicant has also provided design plans to the City of Santee for the project driveways that would be located on Carlton Oaks Drive. Prior to pulling grading permits, the project applicant would be required to submit sight distance analyses and design plans for all access points and internal streets, which must be approved by the Cities of Santee and San Diego, as applicable. This would ensure that the access design is consistent with the relevant City of Santee and City of San Diego design manual and sight-distance standards.

As shown on Figure 2-3 in Chapter 2, the proposed alignment of the Carlton Oaks Segment of the San Diego River Trail would cross the proposed project's western access point. The proposed project would implement a high-visibility crosswalk and install trail-crossing signage at the driveway to alert motorists of the trail's presence. Based on the design of the graded bench, cyclists would need travel approximately 100 feet, at grade, toward West Hills Parkway prior to crossing the project driveway, which would provide additional time and visual opportunities for cyclists to see traffic turning into and out of the driveway and additional opportunities for motorists to see cyclists utilizing the pathway. Additionally, the future improved trail, which is not part of the proposed project and would be constructed by others, would be constructed based on National Association of City Transportation Officials, Federal Highway Administration, and City of San Diego standards, as appropriate. Therefore, the implementation of the San Diego River would not be anticipated to create an additional safety hazard at the project driveway.

Impact Determination

As discussed in the previous subsection, the project would maintain adequate stopping-sight distance along all private internal roadways and would maintain adequate intersection sight distance at all intersections with public roadways. Moreover, all internal streets would meet or exceed Santee Fire Department (SFD) requirements, and a signal-warrant analysis (see Appendix O2) determined that the project driveways would function adequately without the need for traffic signalization. The proposed project would have a less-than-significant impact related to increased hazards due to a geometric design feature or incompatible uses.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: Would implementation of the proposed project result in inadequate emergency access?

Impact Discussion

A *Fire Protection Plan* (Appendix R1) and *Wildland Fire Evacuation Plan* (Appendix R2) were prepared for the proposed project to address emergency access and evacuation in the case of an emergency. The proposed internal roadways would be built according to the currently adopted California Fire Code and City Ordinance No. 570, including a minimum of 26-foot widths, with the exception of the private roadways which provide direct vehicular access to each of the cluster units of four units or fewer. These private cul-de-sac roads would be 20 feet in width as allowed by the exceptions to California Fire Code Section 503.2.1. The proposed internal roadways would be unobstructed and would include adequate parking, turning radius, grade maximums, and roadside fuel modification zones.

The proposed project would also provide emergency access that meets current City of Santee requirements for the proposed development. Two emergency access points would also be provided. The first emergency access point would be provided via an extension of Private Drive “C” westerly to West Hills Parkway. West Hills Parkway would be widened within the existing right-of-way (ROW) from Carlton Oaks Drive, approximately 700 feet south of the existing bridge, to provide a dedicated left-turn lane into Residential West. Emergency access would also be provided to Residential West via an extension of a private drive to West Hills Parkway, which would be 26 feet wide with curb and gutter and asphalt concrete pavement and base, with grades, horizontal alignment, and turnarounds that meet the City of Santee’s Fire requirements. This emergency access point would be gated and would not be open to the public except during times of emergency. The second emergency access would be from the existing private driveway at the Vista del Verde condominiums to the east. A 26-foot-wide private emergency access road for the Residential North and resort parcels would be provided through the existing Vista del Verde condominiums located in the northeastern corner of the project site. A new fence with an emergency access gate would be erected at the boundary line between the project and the Vista del Verde condominium property. This emergency access road would also meet the City of Santee’s Fire requirements.

The primary evacuation routes, accessed from internal project roadways, lead to Carlton Oaks Drive, West Hills Parkway, Carlton Hills Boulevard, Mission Gorge Road, Cuyamaca Street, and Mast Boulevard. These roads provide access to urbanized areas and major traffic corridors, including SR- 125 and SR-52.

The project would include off-site improvements to West Hills Parkway, which would be widened within the existing ROW from Carlton Oaks Drive, approximately 700 feet south of the existing bridge, to provide a dedicated left-turn lane into Residential West. New lane configuration would include a raised median and increased width for bike lanes. The project would also include a private utility maintenance road between Residential West and Residential North and golf course parcels. This roadway is not considered a fire apparatus access road but would be built to Fire Code and could be used as another emergency evacuation route if needed. It would allow for an additional evacuation route and would provide further evacuation options.

Impact Determination

All streets and project access driveways would meet or exceed SFD requirements. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

Construction

Construction of the project would occur on site and is not expected to interfere with established emergency responses or evacuation plans or result in inadequate emergency access. As noted previously, a traffic control plan (PDF-12A, Traffic Control Plan) will be prepared by the applicant and implemented during construction as required by the City of Santee and City of San Diego in accordance with the encroachment permit requirements. The traffic control plan will account and provide for the safe and effective movement of road users through or around temporary traffic control zones, including emergency vehicles. The City of Santee's and City of San Diego's Traffic Engineering Division reviews traffic control plans to balance the safety of construction workers with the need to minimize delays to emergency vehicles and other drivers. Traffic control plans shall follow the Manual on Uniform Traffic Control Devices California Edition and the San Diego Regional Standard Drawings. These traffic management controls will include measures determined on the basis of site-specific conditions, including the use of construction signs, delineators, and lane closures. The traffic control plan will include graphics illustrating the placement of signage, striping, traffic personnel, road cones, and emergency access points, as applicable.

Adherence to the traffic control plan (PDF-12A, Traffic Control Plan) would ensure that any changes to existing traffic flow patterns will be minimal and limited to the surrounding project area. Therefore, the overall traffic circulation in the vicinity of the proposed project should not be affected; as such, emergency response times and access should also be maintained during project construction. With the implementation of the traffic control plan, the construction of the proposed project would not result in inadequate emergency access, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.16.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would implementation of the proposed project conflict with program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

The geographic context for the analysis of cumulative impacts with respect to conflicts with a program, plan, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, consists of the projects within the City of Santee and adjacent communities (see Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis). As with the proposed project, cumulative projects that may cause a degradation to the circulation system, including transit, roadway, bicycle, and pedestrian facilities, could occur if the proposed project were to conflict with the programs, plans, ordinances, or policies related to these facilities during construction or operation.

Generally, policies in the City of Santee's *General Plan – Mobility Element* (City of Santee 2017) encourage a holistic, balanced, and interconnected multimodal approach to the 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. Policy 2.1 specifically prescribe the operational expectations for roadways and intersections within the City of Santee. The City of San Diego's *General Plan – Mobility Element* does not include any policies that specifically prescribe the operational expectations or requirements for roadway and intersection operations.

The City of Santee identified six projects that are anticipated to be developed by the end of 2026 that would contribute traffic to the project area. These projects were selected based on a combination of their trip generation, trip assignment, and proximity to the transportation study area. These factors were used to determine their likelihood of contributing additional traffic within the transportation study area. Cumulative projects within the City of Santee that are located at a much farther distance from the project site, and generate a lower number of daily trips are not anticipated to contribute trips to the project site, are not included in the cumulative transportation analysis. It should be noted that the cumulative projects are only used for the roadway operations analysis that was conducted to determine if the proposed project is consistent with Mobility Element Policy 2.1 and are not used for any other CEQA analysis.

These six cumulative projects have been included in the Near-Term Year 2026 base scenario to provide an accurate background for comparing traffic critical effects associated with the proposed project. The purpose of the Near-Term Year conditions analysis is to ensure that the study takes into consideration all cumulative traffic growth that would occur by the project's opening year. The analysis year of 2026 was selected for the Near-Term analysis since this is the anticipated opening year of the proposed project where all land use components would be fully developed and contributing traffic to the project site.

As discussed in the *Draft Local Transportation Assessment*, May 6, 2025, prepared by Intersecting Metrics (Appendix O2), Near-Term Year 2026 traffic volumes were developed by adding the identified specific cumulative project traffic volumes to the Year 2026 roadway and intersection traffic volumes. All of the transportation study area roadway segments and intersections within the City of Santee are projected to operate at acceptable LOS D or better under Near-Term Year 2026 with Project conditions with the exception of Carlton Oaks Drive, from Fanita Parkway to Carlton Hills Boulevard, which would operate at LOS E. However, the City of Santee's *General Plan – Mobility Element* (City of Santee 2017) identified this segment of Carlton Oaks Drive as operating at LOS E under Preferred Plan conditions. Therefore, the projected LOS operations along this segment under Near-Term Year 2026 with Project conditions is consistent with the City of Santee's *General Plan*. It should be noted that the City of San Diego's *General Plan* does not include a minimum LOS policy. Therefore, facilities located within the City of San Deigo were not included in the operations analysis.

Further, the proposed project would not conflict with a program, plan, ordinance, or policy addressing transit, bicycle, or pedestrian facilities, as identified through the analysis presented in Threshold 1, above; therefore, the proposed project would not contribute to a cumulative impact on these facilities.

Similar to the proposed project, the cumulative projects would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Therefore, a significant cumulative impact would not occur, and the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 2: Would implementation of the proposed project conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b)?

As outlined in Section 2.6, Cumulative VMT Impacts, of the City of Santee's *VMT Analysis Guidelines* (City of Santee 2022a), "if a project is consistent with the assumptions in SANDAG's 2021 *Regional Plan*, the existing conditions project-level analysis is sufficient to determine cumulative impacts." The proposed project would not be in conflict with the assumptions of SANDAG's 2021 *Regional Plan*, thus, the findings for **Impact TRA-1** and **Impact TRA-2** would also be applicable to cumulative conditions. Therefore, the proposed project would have significant and unavoidable cumulative transportation-related impacts because no feasible mitigation measures could be identified (**Impact C-TRA-1** and **Impact C-TRA-2**).

Cumulative Threshold 3: Would implementation of the proposed project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The geographic context for the analysis of cumulative impacts in regard to transportation hazards due to a geometric design feature or incompatible uses consists of the City of Santee projects listed in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis. Each project would be required to design its circulation to be in compliance with applicable City of Santee and City of San Diego *General Plan – Mobility Elements* and relevant City of Santee and/or San Diego design standards to ensure a system of complete streets that supports multiple user types, including motorists, pedestrians, and bicyclists.

Similar to the project, all cumulative projects would be required to design public roadways in accordance with applicable City of Santee and/or San Diego standards, satisfactory to the City Engineer. In addition, prior to pulling grading permits, the cumulative projects would be required to design all access points and internal roadways to meet the City of Santee and/or San Diego Public Works standards and SFD's specifications. As applicable, all design plans and sight distance analyses must be approved by City of Santee and/or San Diego prior to project approval. This would ensure that the design of each cumulative project is consistent with the relevant design manuals and sight distance standards, and thus would not cause any incompatible use or any additional hazards to the surrounding area or general public. Therefore, a significant cumulative impact would not occur, and the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 4: Would implementation of the proposed project result in inadequate emergency access?

The geographic context for the analysis of cumulative impacts in regard to inadequate emergency access is the City of Santee and the list of City of Santee projects provided in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis. The proposed project's impact is addressed under Threshold 6 of Section 3.8, Hazards and Hazardous Materials, as well as under Threshold 4, above. As discussed, all streets and project access driveways would meet or exceed SFD requirements. Therefore, the project would be readily accessible from adjacent roadways during an evacuation or fire situation, and the project has been designed so that it would not affect roadway through-lane capacity or hinder emergency response.

California state law requires drivers to yield the right of way to emergency vehicles and permits emergency vehicles to use opposing lane of travel, the center turn lanes, or bus-only lanes. Emergency responders also routinely use the center left-turn lanes, or even travel in opposing travel lanes, if needed. Generally, multilane roadways allow emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. In addition, cumulative projects would be required to undergo separate CEQA review to ensure that projects are designed to meet City of Santee and/or San Diego fire department specifications for providing adequate fire

access, such as a traffic management plan or secondary access routes. The cumulative projects would also be required to implement measures necessary to mitigate any potential impacts on emergency access. Therefore, a significant cumulative impact would not occur. In addition, the proposed project would provide adequate emergency access that meets both the City of Santee and City of San Diego's requirements and standards. Therefore, the proposed project's contribution would not be cumulatively considerable.

3.16.7 Summary of Significant Impacts

Table 3.16-8 provides a summary of significant impacts related to transportation and corresponding mitigation measures.

Table 3.16-8. Summary of Significant Transportation Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measure	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact TRA-1: Generate Vehicle Miles Traveled in Exceedance of Thresholds for Residential Uses.	MM-TRA-1: Implement TDM Measures.	Significant and Unavoidable	The total VMT reduction associated with the TDM measures listed as part of MM-TRA-1 above would be 2.0% for residential-related VMT. As identified in Table 3.16-4, the proposed project would have to reduce its VMT/Capita by 22.4% (City of Santee) and 29.4% (City of San Diego) in order to reduce the project-related impacts to less than significant.
Impact TRA-2: Generate Vehicle Miles Traveled in Exceedance of Thresholds for Commercial Uses.	MM-TRA-1	Significant and Unavoidable	The total VMT reduction associated with the TDM measures listed as part of MM-TRA-1 above would be 3.1% for employment-related VMT. As identified in Table 3.16-4, the proposed project would have to reduce its VMT/Employee by 16.6% (both jurisdictions) in order to reduce the project-related impacts to less than significant.
Impact C-TRA-1	MM-TRA-1	Significant and Unavoidable	Refer to MM-TRA-1

3.16.8 References

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3.17 Utilities and Service Systems

3.17.1 Overview

This section describes the existing conditions and applicable laws and regulations for utilities, both on- and off-site, followed by an analysis of the proposed Carlton Oaks Country Club and Resort Project (project).

The following technical reports were prepared for the proposed project:

- **Carlton Oaks Golf Course Proposed Community Water Study**, November 2021, prepared by HDR Engineering (Appendix P1)
- **Supplemental Water Study for the Carlton Oaks Development Project**, June 2024, prepared by Dexter Wilson Engineering (Appendix P2)
- **Carlton Oaks PA-1, PA-2, and PA-3 Sewer Study**, April 2021, prepared by Dudek (Appendix P3)
- **Supplemental Sewer Study for the Carlton Oaks Development Project**, November 2022, prepared by Dexter Wilson Engineering (Appendix P4)

3.17.2 Environmental Setting

This section describes the geographic setting for the existing utility systems that serve the project site including water supply, wastewater conveyance and treatment, stormwater conveyance, solid waste generation and disposal, and electrical/natural gas service and availability.

3.17.2.1 Water

Padre Dam Municipal Water District

The proposed project is in the water service boundary of Padre Dam Municipal Water District (PDMWD), which imports 100% of its potable water supply through the San Diego County Water Authority (SDCWA). The SDCWA is one of 26 Metropolitan Water District of Southern California (MWD) member agencies and is the largest MWD member agency in terms of deliveries.

PDMWD currently serves a population of more than 100,000 people and provides approximately 39,000 combined water, sewer, and recycled water service connections (PDMWD 2022). The 73-square-mile service area is in the eastern section of the County of San Diego and serves the City of Santee and the unincorporated communities of Blossom Valley, Dehesa, Crest, Alpine, Harbison Canyon, and Flinn Springs. PDMWD is divided into two service areas: Western Service Area and Eastern Service Area. The Western Service Area serves potable, wastewater, and recycled water to the City of Santee, including the project site, and parts of the City of El Cajon and the unincorporated community of Lakeside.

PDMWD's current infrastructure includes 601 miles of water, wastewater, and recycled water pipelines, 30 reservoir tanks, 17 pump stations, 4 lift stations, a wastewater recycling facility (WRF), and additional infrastructure (PDMWD 2022). PDMWD's potable water system primarily consists of water-storage facilities with a combined storage capacity of approximately 110 million gallons. Pipelines in PDMWD's service area include a combination of asbestos-cement, polyvinyl chloride (PVC), and concrete-cylinder pipe. Booster stations are distributed throughout

the district area to pump water from lower-pressure zones to higher-pressure zones. The use of pressure-reducing stations provides the ability to transfer water from higher- to lower-pressure zones to serve customers in different pressure zones.

Metropolitan Water District

The Metropolitan Water District (MWD) is Southern California's wholesale water provider. MWD's service area totals approximately 5,200 square miles and includes the counties of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura. MWD comprises 26 member agencies, including 14 cities and 11 municipal water districts. MWD owns and operates the Colorado River Aqueduct, and the Colorado River is one of MWD's two main water sources. Under the priority system that governs the distribution of Colorado River water made available to California, MWD holds the fourth priority right of 550,000 acre-feet per year (AFY) (MWD 2021).

MWD's second major water source is the State Water Project (SWP), owned by the State of California and operated by the California Department of Water Resources (DWR). The SWP's supply originates in northern California, with water captured from the Feather River.

MWD is expected to have a surplus of water, with a minimum amount of 145,000 AFY of surplus during the multiple dry year scenario. MWDs' *Integrated Resources Plan 2015 Update* (IRP 2015 Update) (MWD 2016) incorporated a balanced approach to stabilize traditional imported water supplies, while continuing to evolve local supplies to ensure 100% reliability for full-service demands at the retail level. The IRP 2015 Update established regional targets for conservation, local supplies, SWP supplies, Colorado River supplies, groundwater banking, and water transfers; it also establishes long-term planning goals for additional future resources, such as stormwater capture and seawater desalination, to minimize water shortages and restrictions (MWD 2016).

MWD's 2020 *Integrated Water Resources Plan – Regional Needs Assessment* was adopted on April 12, 2022 (MWD 2022) and took a new approach that forecasts multiple regional water demand scenarios rather than one. From this exercise MWD has identified the tools necessary to adapt to a variety of plausible futures successfully.

San Diego County Water Authority

SDCWA, a member agency of MWD, is the countywide water wholesaler and comprises 24 public member agencies stretching from the United States–Mexico border to the Orange County and Riverside County lines. SDCWA owns and operates five large-diameter pipelines that deliver imported water to its member agencies. SDCWA has embarked on a multiyear emergency-storage plan to provide up to 6 months of emergency water supplies in the event of a system failure or other issue with receiving imported water from MWD (SDCWA 2021).

In November 2012, SDCWA's Board of Directors approved a 30-year water-purchase agreement with Poseidon Resources, a private, investor-owned company, to purchase water from the proposed Carlsbad Desalination Plant. The plant and conveyance pipeline were completed in 2015 and can provide a reliable local supply of up to 56,000 AFY for the region (SDCWA 2021).

The SDCWA has encouraged the development of local water supply projects, such as water recycling and groundwater projects, through the award of Local Water Supply Development incentives. The Local Water Supply Development Program was designed to ensure the financial feasibility of local water recycling projects during their initial years of operation and incentivize recycled water development in the SDCWA service area. To date, more than \$55 million in incentive funding has been awarded to program participants (SDCWA 2021).

Currently, water is supplied to the existing hotel, restaurant, and golf course off Carlton Oaks Drive through an existing system. As noted in the Water Availability Letter (Appendix Q1), any existing water services not used as part of the proposed project would be abandoned at the main by PDMWD at the applicant's expense and removed from the ground by the applicant.

On-Site Wells

There are four existing wells on site that are used to fill the golf course's irrigation ponds. Water is then used as needed to irrigate approximately 132 acres of turf on the existing golf course. The depths of the wells are approximately 840 to 960 feet below land surface and yield approximately 200 to 250 gallons per minute (gpm).

3.17.2.2 Wastewater

Approximately 1,731 AFY of recycled water is used in PDMWD's service area through 232 existing recycled water connections, representing less than 1% of its total service connections. Wastewater pipelines are located in developed streets surrounding the project site to collect wastewater from existing development. Raw wastewater is transported from an influent pump station south of the Santee Lakes Recreation Preserve to the Ray Stoyer WRF, directly north of the Santee Lakes Recreation Preserve, by a main pipeline in Fanita Parkway. The treated recycled water is equally distributed between the Santee Lakes Recreation Preserve and the Fanita Terrace Reservoir. The WRF treats wastewater to the tertiary level. Historically, approximately 1 million gallons per day goes into Santee Recreational Lakes, with the rest used for irrigation at community parks, schools, city streetscapes, and community decorative fountains. Recycled water stored in the 1.5-million-gallon Fanita Terrace Reservoir is gravity-fed to PDMWD's recycled water distribution system, which consists of 26 miles of recycled water pipelines. The remaining wastewater not treated by the Ray Stoyer WRF, approximately 2,251 AFY, is conveyed by the influent pump station to the City of San Diego's Metropolitan Wastewater System (Metro) to be treated at the Point Loma Wastewater Treatment Plant and discharged into the Pacific Ocean. PDMWD also offers free recycled water at a temporary recycled water fill station in the City of San Diego to PDMWD customers during a Level 1 drought watch. Local customers must fill their own PDMWD-approved recycled water container, no larger than 300 gallons, and use this source solely for irrigation at their property. Currently, PDMWD plans to expand the Ray Stoyer WRF from 2 to 15 million gallons per day and construct a new facility per the East County Advanced Water Purification (ECAWP) Program to perform advanced water purification by taking recycled water from East County through an additional, four-step water purification process, pumping it into Lake Jennings, and then treating it again at the Helix Levy Treatment Plant before distributing it into the drinking-water supply. The purified water produced from the new facility would reduce reliance on imported water purchases through the SDCWA and improve water supply reliability by up to 30% through surface water augmentation in Lake Jennings. The ECAWP Program is currently in the preliminary engineering and permitting phase, and construction is estimated to be completed in 2025.

3.17.2.3 Storm Drainage

The project site is in the San Diego River Watershed, a 440-square-mile area that drains to San Diego River and discharges to the Pacific Ocean at the community of Ocean Beach. The river generally flows from the northeast to the southwest through urban areas and would be the project site's receiving waters, located along the southern project site boundary. Stormwater runoff from the project site would be conveyed directly to San Diego River via two existing underground storm drain systems. An existing 72-inch storm drain currently discharges to the project site from the headwall located immediately off site at the northern property line of Residential West. The existing headwall includes a large, concrete energy dissipator and concrete channel. These storm drain facilities are located

off site, on existing residential lots (Lots 679 and 680 of Map 7295), and within an existing public easement (City of Santee-owned).

3.17.2.4 Solid Waste Conditions

Commercial and residential trash hauling, as well as industrial solid waste and recycling collection and disposal services, are provided by Waste Management Inc., under a contractual franchise agreement with the City of Santee. In addition, the hauler provides curbside recycling and yard-waste collection, household hazardous waste disposal services, public education, and other services required to meet the waste management needs of the City of Santee. This includes the development of programs necessary to meet the state-mandated 50% waste-reduction goal established by Assembly Bill (AB) 939 (the California Integrated Waste Management Act of 1989).

The closest landfill to the proposed project is the Sycamore Landfill, located in Santee and owned/operated by a private waste hauler. The Sycamore Landfill receives approximately 5,000 tons of trash per day. At this rate of disposal, the Sycamore Landfill will likely be filled to capacity and close by 2042 (CalRecycle 2016a).

Additional active solid waste landfills within the County of San Diego include the Borrego Springs, Otay, San Onofre, and Las Pulgas landfills. Of these, the closest facility is North Otay Landfill. Otay Landfill is approximately 21 miles from the project site and, as of 2016, has a remaining capacity of approximately 21 million cubic yards. This landfill is permitted to receive a maximum of 6,700 tons per day, with a maximum permitted capacity of 61 million cubic yards. The projected closing date is February 28, 2030 (CalRecycle 2016b).

3.17.2.5 Electric Power, Natural Gas, and Telecommunications Facilities

San Diego Gas and Electric (SDG&E) currently provides electricity and natural gas services to the project site. SDG&E owns a transmission-line easement that travels through the project site from east to west. The City of Santee is currently served with electricity through both aboveground and underground transmission lines within local roadways, in addition to natural gas through underground gas mains within local roadways.

The City of Santee is currently supplied with telecommunications services through various private companies. The infrastructure is typically located underground in vaults and conduit and aboveground on overhead power lines with pole mounted cables and transformers. Antennas may also be mounted in towers or on roofs.

3.17.3 Applicable Laws and Regulations

3.17.3.1 Federal

Telecommunications Act of 1966

The Telecommunications Act of 1996 amended the Communications Act of 1934, providing major changes in laws affecting cable television, telecommunications, and the internet. The law's main purpose is to stimulate competition in telecommunication services. The law specifies (1) how local telephone carriers can compete, (2) how and under what circumstances local exchange carriers can provide long-distance services, and (3) the deregulation of cable television services. The Act is pertinent to the regulatory environment under which telecommunications infrastructure is installed and maintained.

3.17.3.2 State

Water

California Water Plan

DWR prepared the California Water Plan in 2018, and has released the final version of the California Water Plan Update 2023, referred to as *Update 2023* (DWR 2023). *Update 2023* provides a framework for water managers, water districts, cities and counties, and Tribal communities, to inform and guide the use and development of water resources in the state. To match the pace of climate change impacts, California must move smarter, faster, and collaboratively to update its water systems. To accomplish this, Update 2023 builds on the Water Resilience Portfolio, and California's Water Supply Strategy to ensure a more climate-resilient future for the state's water supplies. The California Water Plan, which is updated every 5 years, presents basic data and information about California's water resources, including water supply evaluations and assessments of agricultural, urban, and environmental water uses to quantify the gap between water supplies and uses.

The California Water Plan also identifies and evaluates existing and proposed statewide demand-management and water supply-augmentation programs and projects to address the state's water needs. The California Water Plan provides resource-management strategies and recommendations to strengthen integrated regional water management. A *resource-management strategy* is a project, program, or policy that helps local agencies and governments manage their water and related resources. Resource-management strategies help regions meet future demands and sustain the environment, resources, and economy, involve communities in decision making, and meet various goals. These strategies can reduce water demand, improve operational efficiency, increase water supply, improve water quality, enhance the practice of resource stewardship, and improve flood management. Additionally, the California Water Plan includes a finance plan that identifies critical priorities for state investment in integrated water management activities.

California Water Code

The California Water Code contains provisions that control almost every consideration of water and its use. California Water Code Division 2 (Water) provides that the State Water Resources Control Board (SWRCB) consider and act on all applications for permits to appropriate waters. California Water Code Division 6 (Conservation, Development, and Utilization of State Water Resources) controls conservation, development, and utilization of the state water resources, and Division 7 (Water Quality) addresses water quality protection and management.

Senate Bill 610

Senate Bill (SB) 610 (Water Code Sections 10910 and 10912), which took effect on January 1, 2002, promotes more-collaborative planning between local water suppliers and cities and counties. It requires that water supply assessments occur early in the land use planning process for all large-scale development projects.¹ The required

¹ In accordance with the 2014 CEQA Statute and Guidelines Section 15155, a project is considered to be a *water-demand project* if one of the following definitions applies:

- a. It is a residential development of more than 500 dwelling units.
- b. It is a shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- c. It is a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.

assessments must include detailed analyses of historic, current, and projected groundwater pumping and an evaluation of the sufficiency of the groundwater basin to sustain a new project's demands. It also requires an identification of existing water entitlements, rights, and contracts and a quantification of the prior year's water deliveries. A water supply assessment was not prepared for the project because it would not generate a demand for water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project.

Senate Bill 221

Enacted in 2001, SB 221, codified in the California Water Code, beginning with Section 10910, requires that the legislative body of a city or county empowered to approve, disapprove, or conditionally approve a subdivision map must condition such approval on proof of sufficient water supply. The term *sufficient water supply* is defined in SB 221 as the total water supplies available during normal, single-dry, and multiple dry years within a 20-year projection that would meet the projected demand associated with the proposed subdivision. The definition of sufficient water supply also includes the requirement that sufficient water encompass not only the proposed subdivision, but also existing and planned future uses, including, but not limited to, agricultural and industrial uses. SB 221 requirements do not apply to the general plans of cities and counties, but rather to specific development projects.

California Urban Water Management Act

The 1983 California Urban Water Management Planning Act (AB 797) required urban water suppliers to prepare and adopt an Urban Water Management Plan (UWMP) every 5 years. The main goal of the UWMP is to forecast future water demands and water supplies under average and dry year conditions, identify future water supply projects (e.g., recycled water), provide a summary of water conservation BMPs, and provide a single- and multiple-dry year management strategies.

Sustainable Groundwater Management Act of 2014

On September 16, 2014, California Governor Jerry Brown signed three bills—AB 1739 and SBs 1168 and 1319, collectively referred to as the Sustainable Groundwater Management Act of 2014—to create a framework for sustainable local groundwater management. The legislation allowed local agencies to tailor sustainable groundwater plans to their regional economic and environmental needs. The bills established the definition of *sustainable groundwater management* and required local agencies to adopt management plans for the state's most important groundwater basins. The legislation prioritizes groundwater basins that are currently overdrafted and sets a timeline for implementation, as follows:

- By 2017, local groundwater-management agencies must be identified.
- By 2020, overdrafted groundwater basins must have sustainability plans in place.
- By 2022, other high- and medium-priority basins not currently in overdraft must have sustainability plans in place.

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- d. It is a hotel or motel, or both, having more than 500 rooms.
 - e. It is an industrial, manufacturing, or processing plant or industrial park planned to house more than 1,000 persons, occupy more than 40 acres of land, or have more than 650,000 square feet of floor area.
 - f. It is a mixed-use project that includes one or more of the projects specified in subdivisions (a)(1)(A), (a)(1)(B), (a)(1)(C), (a)(1)(D), (a)(1)(E), and (a)(1)(G) of 2014 CEQA Statute and Guidelines Section 15155.
 - g. It is a project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project.

- By 2040, all high- and medium-priority groundwater basins must achieve sustainability.

The legislation also provided measurable objectives and milestones to reach sustainability and a state role of limited intervention when local agencies fail to adopt sustainable management plans. Local water agencies and the County of San Diego work together to ensure compliance with this legislation.

California Health and Safety Code Section 17921.3

California Health and Safety Code Section 17921.3 requires low-flush toilets and urinals in the majority of buildings.

Solid Waste

California Integrated Waste Management Act

The California Integrated Waste Management Act of 1989 (AB 939) required each city and county in California, as well as regional solid waste management agencies, to enact plans and implement programs to divert 25% of their waste streams by 1995 and 50% by 2000.

Assembly Bill 75

AB 75 (PRC Sections 42920–42927) required all state agencies and large state facilities to divert at least 25% of all solid waste from landfills by January 1, 2002, and 50% by January 1, 2004. The law also required—and now allows—each state agency and large facility to submit an annual report to CalRecycle summarizing its yearly progress toward implementing waste diversion programs.

California Solid Waste Reuse and Recycling Access Act

The California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327) was enacted on October 11, 1991, and added Chapter 18 to PRC Division 30, Part 3. The Act required each jurisdiction to adopt an ordinance by September 1, 1994, requiring any “development project” for which an application for a building permit is submitted to provide an adequate storage area for collection and removal of recyclable materials.

Assembly Bill 1826

AB 1826 (Mandatory Commercial Organics Recycling), enacted on April 1, 2016, requires a business that generates a specified amount of organic waste per week to arrange for recycling services for that organic waste in a specified manner. On January 1, 2017, the bill decreased the amount of organic waste under which a business would be subject to those requirements from 8 cubic yards or more to 4 cubic yards or more. The bill also required a business that generates 2 cubic yards or more of commercial solid waste per week to arrange for organic waste recycling services.

This bill further required each jurisdiction, on and after January 1, 2016, to implement an organic waste recycling program to divert organic waste from the businesses subject to this act, except as specified with regard to rural jurisdictions, thereby imposing a state-mandated local program by imposing new duties on local governmental agencies. The bill required each jurisdiction to report to CalRecycle on its progress toward implementing the organic waste recycling program, and the department is required to review whether a jurisdiction is in compliance with this Act.

Senate Bill 1383

SB 1383 (Short-Lived Climate Pollutant Reduction Strategy), enacted in 2016, established specified targets for reducing organic waste in landfills. This bill required the California Air Resources Board (CARB), in consultation with the California Department of Food and Agriculture, to adopt regulations to reduce methane emissions from livestock manure-management operations and dairy manure-management operations, as specified. The bill required CARB to take certain actions prior to adopting those regulations and specified that the regulations would take effect on January 1, 2024.

Energy (Electricity and Natural Gas)

Senate Bills 1078/107/X 1-2, Renewables Portfolio Standard and Renewable Energy Resources Act (2002, 2006, 2011)

SBs 1078 and 107 obligated investor-owned utilities, energy service providers, and Community Choice Aggregations to procure an additional 1% of retail sales per year from eligible renewable sources until 20% was reached (in 2010). The California Public Utilities Commission (CPUC) and California Energy Commission (CEC) were jointly responsible for implementing the program. SB X 1-2, called the California Renewable Energy Resources Act, obligated all California electricity providers to obtain at least 33% of their energy from renewable resources by 2020. As noted above, SB 350 increased the Renewables Portfolio Standard (RPS) to 50% for 2030.

Senate Bill 350

SB 350 (Clean Energy and Pollution Reduction Act), signed into law on October 7, 2015, required utilities to procure eligible renewable energy resources totaling 50% by 2030, including the following interim targets:

- Achieve 40% renewables by 2024.
- Achieve 45% renewables by 2027.
- Achieve 50% renewables by 2030, and maintain this level in all subsequent years.

Senate Bill 100 (2018)

SB 100 (De León, also known as the California Renewables Portfolio Standard Program and the 100 Percent Clean Energy Act of 2018) was approved by the California Legislature and signed by Governor Brown in September 2018. The bill established a new RPS target of 50% by 2026, increased the RPS target in 2030 from 50 to 60%, and established a goal of 100% zero-carbon energy sources by 2045.

California Code of Regulations, Title 24, Part 6

In 2022, CCR Title 24, Part 6 (the California Energy Code) established energy-conservation standards for new construction. These standards relate to insulation requirements, glazing, lighting, shading, and water- and space-heating systems. Local governmental agencies may adopt and enforce energy standards for newly constructed buildings and additions, alterations, and repairs to existing buildings, provided that the CEC finds that the standards would require buildings to be designed to consume no more energy than permitted by CCR Title 24.

California Green Building Standards Code

The California Green Building Standards Code (CALGreen) is a mandatory, statewide green building code that all cities in California were required to adopt by January of 2022. CALGreen required new standards for material reuse, locally sourced materials, water/energy efficiency, and indoor air quality.

Assembly Bill 2021

AB 2021, passed in 2006, requires CEC, on or before June 1, 2007, and every 3 years thereafter and in consultation with the CPUC, to identify all potentially achievable cost-effective electricity and natural gas efficiency savings and establish 10-year statewide energy efficiency savings targets. The bill further required all locally owned electric and natural gas utilities to meet energy efficiency savings targets.

California Public Utilities Commission

CPUC regulates privately owned electric, telecommunications, natural gas, water, and transportation companies, as well as household-goods movers and rail safety. CPUC's Energy Division sets electric rates, protects consumers, and promotes energy efficiency, electrical-system reliability, and utility financial integrity. CPUC regulates local natural gas distribution facilities and services, natural gas procurement, intrastate pipelines, and intrastate production and gathering. It works to provide opportunities for competition when, in the interest of consumers, it takes the lead in environmental review of natural gas-related projects, recognizes the growing interaction of electric and gas markets, and monitors gas energy efficiency and other public-purpose programs.

3.17.3.3 Local

Santee General Plan

Divided into nine elements, the City of Santee's *General Plan* is a statement of intent as to the future development of the City of Santee. This is accomplished through objectives and policies that serve as long-term policy guides for physical, economic, and environmental growth. The City of Santee's *General Plan – Land Use Element* and *Safety Element* include provisions for utilities and service systems. Those objectives and policies include the following (City of Santee 2003a, 2003b):

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 3.6: 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.

Safety Element

Policy 3.8: Promote safe, environmentally sound means of solid waste disposal for the community.

Policy 3.9: Investigate ways to encourage businesses to recycle their waste.

City of Santee Jurisdictional Urban Runoff Management Program

The Jurisdictional Runoff Management Program (JRMP) is the City of Santee's approach to improving water quality in rivers, bays, lakes, and the Pacific Ocean through reducing discharges of pollutants to the stormwater conveyance system (City of Santee 2021). The City of Santee's stormwater conveyance system transports runoff from rain, irrigation, natural groundwater seepage, and other sources of water directly to water bodies without treatment. To reduce pollutants in these discharges, the City of Santee implements, or requires its residents, businesses, municipal facilities, and landowners to implement, a variety of BMPs. As the operator of a storm drain system, the City of Santee is subject to a National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit issued by the Regional Water Quality Control Board (RWQCB), San Diego Region. The MS4 Permit requires the City of Santee to reduce pollutants in discharges from its storm drain system to water bodies. Enforcement of the JRMP helps prevent stormwater pollutants from entering into the local storm drains and, ultimately, San Diego River.

Padre Dam Municipal Water District Urban Water Management Plan

The City of Santee is within the PDMWD's Western Service Area. The purpose of the UWMP (PDMWD 2020) is to maintain the efficient use of urban water supplies, promote conservation programs and policies, ensure that sufficient water supplies are available for future beneficial use, and provide a mechanism for response during drought conditions. The UWMP contains a 5-consecutive-dry-year water-reliability assessment, drought risk assessment, seismic risk assessment, water-shortage contingency plan, procedures for groundwater-supply coordination, and a water supply reliability assessment.

3.17.4 Project Impact Analysis

3.17.4.1 Methodology

Analysis of potential impacts related to utilities and service systems was based on a detailed review of those technical reports, the project description, a virtual field study of the project study area via Google Earth, and review of the relevant planning, policy, and research documents that guide utility-intensive resource planning for the project site. To the extent feasible, utility impacts are analyzed by providing overall consumption estimates (over

the lifetime of the project) for water supply, wastewater/sewer capacity (annual basis), stormwater capacity (annual basis), electricity, natural gas, telecommunications, and solid waste generation/capacity, and then relating those estimates to the relevant plans, policies, and agencies and the overall availability/supply for each respective resource area, as appropriate.

3.17.4.2 Thresholds of Significance

The following significance criteria are based on California Environmental Quality Act (CEQA) Guidelines Appendix G and provide the basis for determining the significance of impacts associated with utilities and service systems that could result from implementation of the proposed project.

Impacts would be considered significant if the proposed project were to result in any of the following conditions:

1. Require or result in the relocation or construction of new or expanded water, wastewater-treatment, stormwater-drainage, electric-power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects
2. Result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years
3. Result in a determination by the wastewater-treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments
4. 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
5. Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste

3.17.5 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the proposed project require or result in the relocation or construction of new or expanded water, wastewater-treatment, stormwater-drainage, electric-power, natural-gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact Discussion

Water

Development of the project site would increase the demand for potable water to serve the project site's land uses. PDMWD would provide water service for the proposed project. A public water line would be extended from an existing water main beneath Carlton Oaks Drive down to West Hills Parkway and would be continued as a private main within the project site. Water service would be provided by means of a dual, private water system: one private water system would deliver domestic water, and the second private system would provide fire protection.

Irrigation services would be provided to each planning area and would be separate from the domestic and fire services that would respond to emergencies in the project site. Irrigation for the golf course would continue to be provided via the existing wells onsite. Once the golf course is redesigned and the irrigation ponds are reshaped, the wells would be used to fill the irrigation ponds and then water would be pumped from the ponds as needed to irrigate the golf course, similar

to existing conditions. No new or expanded water facilities would be required in order to irrigate the redesigned golf course.

With the exception of the extension of the Carlton Oaks Drive public water main into the project site, all new water facilities would be located within the project site. The private water systems within Residential West, Residential North, and the resort areas would be located within the project site and would connect to the public water main within Carlton Oaks Drive. Such facilities would be installed during project construction and within the disturbance area of the project site. Therefore, to meet the demands of the proposed project, new and expanded facilities would be required to accommodate the additional development, the construction of which could result in physical impacts on the environment related to air quality, biological resources, cultural and tribal cultural resources, geology, soils, and paleontological resources, and noise. Impacts would be potentially significant (**Impact UTIL-1**).

Wastewater

PDMWD would provide sewer service for the proposed project, which has been conceptually planned in four phases, as described previously (Chapter 2, Project Description), to provide coordination support for the development of public facilities and services.

Residential West would be served by a private 8-inch sewer main connected to a private pump station. The pump station would pump sewage along the northern boundary of the proposed golf course to the east and connect to the existing 15-inch trunk main, located north of the existing golf course, south of the existing residential development, and in between the proposed sites for Residential West and Residential North. The project would include the relocation of the existing 15-inch gravity sewer into the southerly private drive within Residential West. Specific details of the proposed sewer system are provided in Appendices P3 and P4 (*Carlton Oaks PA-1, PA-2 and PA-3 Sewer Study*; and *Supplemental Sewer Study*, respectively).

Private storm drains would collect water on site, pipe it to proposed biofiltration basins that would be located between the residential development and the golf course, and discharge it into Sycamore Creek, which connects to San Diego River. An existing 72-inch storm drain that discharges into an existing artificial pond would be rerouted to drain through the middle of the site in a bypass storm drain pipe that runs parallel to on-site storm drain (i.e., north to south) through the residential developments and directly discharge into Sycamore Creek. Therefore, in order to meet the demands of the proposed project, new and expanded facilities would be required to accommodate the additional development, the construction of which could result in physical impacts on the environment related to air quality, biological resources, cultural and tribal cultural resources, geology, soils, and paleontological resources, and noise. Impacts would be potentially significant (**Impact UTIL-1**).

Electric Power, Natural Gas, and Telecommunications Facilities

SDG&E would provide electricity and natural gas service to the proposed project. These utilities would be extended to the project site from existing local distribution systems in the region. The existing east-west SDG&E electrical-transmission easement on the project site would not be altered as part of the proposed project. New electricity and natural gas facilities would be installed on the project site in joint utility trenches that would be located in public rights-of-way (ROWs), as required by the City of Santee. Additionally, the project would require the installation of four new utility poles, approximately 45 feet to 55 feet in height, in the off-site improvement area. Two utility poles would be placed within the public ROW on Carlton Oaks Drive, and one utility pole would be placed in the public ROW on Burning Tree Way. In addition, an existing stub pole and anchor would be removed from the ROW in front of 8726 Carlton Oaks Drive, and a new utility pole would be placed on the southeastern portion of the driveway.

Alternatively, another option may be considered to re-feed the home located at 8726 Carlton Oaks Drive via a trench from the converted underground system on the south side of Carlton Oaks Drive to the southeast corner of the home and place a trench and conduit up the driveway to the easterly side of the house to tie into the existing weather head on the roof of the home. Telecommunication and cable services would require conduit/cable running upward on the outside of the exterior wall to maintain the overheard points of connection to the home.

In the off-site improvement area, the existing SDG&E cable serving 8713 Carlton Oaks Drive would be removed and re-fed from a transformer located on Oakbourne Road to the same location at the residence.

Because the project site is within the Airport Influence Area for two airports, the proposed project would be required to obtain Federal Aviation Administration approval and Airport Land Use Commission review prior to any construction equipment and operational structures more than 35 feet tall being built, as identified in Section 3.8, Hazards and Hazardous Materials. In conjunction with electricity and natural gas facilities, telephone, cable television, and internet facilities also would be constructed in the joint utility trenches.

Through the project approval process, the applicant would coordinate with the appropriate service providers and City of Santee Engineering Department staff to properly connect to existing facilities. Therefore, to meet the demands of the proposed project, new and expanded facilities would be required to accommodate the additional development, the construction of which could result in physical impacts on the environment related to air quality, biological resources, cultural and tribal cultural resources, geology, soils, and paleontological resources, and noise. Impacts would be potentially significant (**Impact UTIL-1**).

Impact Determination

Impact UTIL-1: Construction of Utilities Have the Potential to Result in Significant Impacts on the Environment

Implementation of the proposed project would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater-drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Potentially significant impacts were identified for air quality, biological resources, cultural and tribal cultural resources, geology and soils, and noise. Therefore, impacts associated with relocation or construction of new or expanded utilities would be potentially significant.

Mitigation Measures

Mitigation measures detailed in Section 3.2, Air Quality and Health Risks; Section 3.3 Biological Resources; Section 3.4, Cultural and Tribal Cultural Resources; Section 3.6, Geology and Soils; Section 3.8, Hazards and Hazardous Materials; and Section 3.12, Noise and Vibration, would be required. As described in these Environmental Impact Report (EIR) sections, all impacts would be reduced to a less-than-significant level with mitigation. No additional mitigation measures would be required.

Level of Significance After Mitigation

Impacts would be less than significant with mitigation.

Threshold 2: Would implementation of the proposed project result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Impact Discussion

The proposed project would redevelop the existing golf course and construct 236 detached multifamily residential units, six single-family residential units, and a clubhouse and hotel that would consist of 10 cottage-style hotel units, 42 hotel rooms, a restaurant, event space, and other accommodations on the project site.

Irrigation for the golf course would continue to be provided via the existing wells onsite. Once the golf course is redesigned and the irrigation ponds are reshaped, the wells would be used to fill the irrigation ponds and then water would be pumped from the ponds as needed to irrigate the golf course, similar to existing conditions. The redesigned golf course would reduce the areas to be irrigated and would utilize a new, modern, efficient irrigation system. Approximately 66 acres of turf would need to be irrigated after the golf course is redesigned, compared to 132 acres of turf that are currently irrigated. This reduction results in a 50% decrease of irrigated areas and a 61% decrease in irrigation water needed for the golf course.

As noted above, with the exception of the four wells used to irrigate the golf course turf, PDMWD provides potable and recycled water to the project site. PDMWD imports 100% of its potable water supply through the SDCWA. The proposed project would not exceed the specified size threshold of 500 residential units or equivalent; thus, preparation of a WSA per SB 610 is not required. However, the following assessment of water supply for the project site is based on the PDMWD UWMP (PDMWD 2020).

Water use within the PDMWD service area is projected to be 12,442 AFY in 2025, increasing to 15,944 AFY in 2045. Residential demands account for 7,438 AFY (or 60%) of the total projected 2025 demand and 10,070 AFY (or 63% of the total projected 2045 demand). The proposed project would generate a water demand of approximately 72,570 gallons per day (Appendix P2, *Supplemental Water Study for the Carlton Oaks Development Project*), which equates to approximately 14 AFY, and would only account for 0.1% of water use in the PDMWD service area. In addition, the increase in population associated with the proposed project was analyzed in the PDMWD UWMP, which anticipated that the proposed project would require up to 150 gallons per day of water demand based on future population demographics. As discussed previously, the proposed project would generate a water demand of approximately 72,570 gallons per day, which would be less than what was projected in the PDMWD UWMP. As such, water supplies are projected to exceed the needs of the PDMWD service area and would adequately cover the demands of the proposed project (PDMWD 2020).

The project's water system would be designed and constructed in accordance with PDMWD's standards and specifications. The proposed project improvements would occur within the existing site boundaries. In coordination with PDMWD, the proposed project's sponsor would ensure that there was sufficient water availability, provided that conditions of approval were met, pursuant to PDMWD's *Project Facility Water Availability Form*, dated March 2022 (Appendix Q1). Therefore, there would be adequate water supplies to serve the proposed project. Impacts would be less than significant, and no additional mitigation would be required.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No additional mitigation measures would be required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: Would implementation of the proposed project result in a determination by the wastewater-treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact Discussion

The proposed project is anticipated to generate approximately 44,746 gallons of sewage per day (Appendix P4, *Supplemental Sewer Study for the Carlton Oaks Development Project*). To accommodate the sewage generated by the proposed project, a private sewer-lift station would be constructed in the existing project footprint. The private sewer-lift station would connect to existing PDMWD wastewater infrastructure. As such, public sewer lines constructed as part of the proposed project would be designed and constructed in accordance with PDMWD's standards and specifications.

The project site is located within an area that is already served by existing PDMWD wastewater infrastructure. In coordination with PDMWD, the proposed project's sponsor would ensure that existing wastewater facilities were sufficient to treat wastewater generated by the proposed project and that conditions of approval were met, pursuant to PDMWD's *Project Facility Sewer Availability Form*, dated March 2022 (Appendix Q2). This information would be reviewed and approved by the City of Santee's Building Department as part of the building-plan preparation process. In addition, the proposed project would be required to adhere to Chapter 12.30 of the City of Santee's Municipal Code, which requires the assurance of adequate wastewater facilities through payment of development impact fees for the constructing public facilities, which are reasonably related to the impacts of the new development.

The proposed project's wastewater would be transferred through PDMWD facilities to the Ray Stoyer Reclamation Facility, to which PDMWD is planning an expansion that would allow for treatment of wastewater for potable use that would otherwise be discharged to the ocean. As such, future wastewater flows would ultimately be managed as a potable resource or a recycled water resource, and the facility would not require additional capacity improvements to treat the wastewater generated by the proposed project. Therefore, there would be adequate wastewater treatment capacity for the proposed project. Impacts would be less than significant, and no additional mitigation would be required.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No additional mitigation measures would be required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: Would implementation of the proposed 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?

Impact Discussion

The California Integrated Waste Management Act of 1989 (AB 939) required municipalities to adopt an integrated waste management plan and establish objectives, policies, and programs related to waste disposal, management, source reduction, and recycling. In addition, SB 1383, passed in 2016, established a target that called for a 50% reduction in organic waste by 2020 and a 75% reduction by 2025. Consistent with the City of Santee's Municipal Code Section 9.04.060, a minimum of 65% of construction and demolition debris generated by construction of the proposed project would be required to be diverted.

Construction

Construction and demolition debris, soil, and solid waste from the proposed project would likely be hauled to Sycamore Landfill (SWIS ID 37-AA-0023). The City of Santee's Construction and Demolition Recycling Ordinance calls for salvage or recycling of at least 65% of construction-related solid waste. Throughout construction, waste would be source-separated and tracked to divert it away from landfills, with the target of recycling more than 65% of construction and demolition waste. Consistent with City of Santee requirements, the project sponsor would submit documentation to the City of Santee, describing the proposed project's approach to maximizing waste diversion during demolition, construction, and occupancy of the residential and commercial uses. Therefore, construction of the proposed project would not be expected to have a significant impact on existing landfills. No additional mitigation would be required.

Operation

Operation of the proposed project would result in the generation of solid waste, but would continue to meet state and local standards for solid waste and recycling. As discussed in Section 3.13, Population and Housing, the proposed project would introduce a new population of approximately 686 residents; the number of employees for operation of the clubhouse and resort would be nominal and unlikely to greatly exceed the number of employees working on site during existing conditions. However, to estimate the project's proposed solid waste generation, an estimate of 100 employees was used for this analysis. These new residents and employees would generate solid waste on the project site. Using CalRecycle's Jurisdiction Diversion/Disposal Rate Summary (CalRecycle 2022), the City of Santee's 2022 per-capita disposal rate per resident was 4.8 pounds per day, and the per capita disposal rate per employee was 16.0 pounds per day. As such, the proposed project would generate approximately 4,893 pounds of solid waste per day, or approximately 2 tons per day.² Waste Management Inc. would collect the solid waste generated at the proposed project and haul it to Sycamore Landfill, which is permitted to receive 5,000 tons of refuse per day. Solid waste generated by the operation of the proposed project (i.e., 2 tons per day) would represent a minimal percentage of the permitted capacity of the Sycamore Landfill. As such, Sycamore Landfill

² This number was calculated as follows: 686 residents × 4.8 pounds/day/person = 3,292.8 pounds/day of solid waste generated from residents; 100 employees × 16.0 pounds/day/person = 1,600 pounds/day; 3,292.8 pounds/day (residents) + 1,600 pounds/day (employees) = 4,892.8 pounds/day generated from operation of the proposed project.

would have adequate capacity for the solid waste generated by the proposed project. Operation of the proposed project would have a less-than-significant impact on existing landfills and solid waste facilities. No additional mitigation would be required.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No additional mitigation measures would be required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 5: Would implementation of the proposed project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact Discussion

Construction and operation of the proposed project would comply with all applicable statutes and regulations related to solid waste. State law (AB 939 and SB 1016) requires businesses to recycle and cities to divert 50% of their solid waste from landfills. The proposed project would adhere to these laws and require waste to be separated and tracked to divert it from landfills, with a target of recycling at a minimum 65% of construction and demolition debris during construction. In addition, the proposed project would be required to adhere to the City of Santee's Construction and Demolition Recycling Ordinance and the City of Santee's Municipal Code, Chapter 9. Therefore, the proposed project would result in less-than-significant impacts with respect to compliance with federal, state, and local statutes and regulations related to solid waste. No additional mitigation would be required.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No additional mitigation measures would be required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.17.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would implementation of the proposed project have a cumulatively considerable contribution to a cumulative public-services impact, considering past, present, and probable future projects' new or expanded utilities or service systems?

The geographic context for the analysis of cumulative impacts in regard to water, wastewater, stormwater-drainage, electric power, natural gas, and telecommunications facilities is the individual service provider's service area in San Diego County. A significant cumulative impact would result if combined cumulative projects were to require the need for new or expanded utilities or service-systems facilities, the construction and/or operation of which could cause significant environmental effects. To support regional growth, including the cumulative projects listed in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, new water, wastewater, stormwater-drainage, electric power, natural gas, and telecommunications facilities would be constructed in the City of Santee and elsewhere in the region. A majority of these new facilities would connect to existing systems. These new facilities could result in new significant physical impacts on the environment, mostly associated with construction activities and placement within sensitive resource areas. It is reasonable to expect that these projects, like the proposed project, would comply with CEQA, and any project-specific impacts identified with the construction of these facilities would be mitigated to the extent feasible.

Due to the proposed project's significant impacts on air quality, and noise, the construction or expansion of utilities or service systems under the proposed project would contribute to the significant impacts identified for these environmental issues. Therefore, in combination with other cumulative projects, the proposed project would have the potential to result in a significant cumulative impact related to the construction or expansion of new utilities or service systems.

Impact Determination

The proposed project's contribution would be cumulatively considerable.

Mitigation Measures

As detailed in Section 3.2, Air Quality and Health Risks; Section 3.3, Biological Resources; Section 3.4, Cultural and Tribal Cultural Resources; Section 3.6, Geology and Soils; and Section 3.12, Noise and Vibration, mitigation measures are required for project-level impacts during the construction phase. As described in these EIR sections, all impacts would be reduced to less-than-significant levels with mitigation. The other reasonably foreseeable future projects in the assessment area would be required to implement similar mitigation measures in order to reduce their own project-specific impacts. Therefore, the project would not contribute to a cumulatively significant effect.

Cumulative Threshold 2: Would implementation of the proposed project have a cumulatively considerable contribution to a cumulative public-services impact, considering past, present, and probable future projects' water-supply availability?

The geographic context for the analysis of cumulative impacts in regard to water supply is the PDMWD water service area. Regarding water supply, the analysis above (Threshold 2) is inherently cumulative because it is based on demand and supply projections for the PDMWD's service area.

As discussed above, the proposed project would only account for 0.1% of water use in the PDMWD service area. The increase in population associated with the proposed project was analyzed in the PDMWD UWMP, which anticipated that the proposed project would require up to 150 gallons per day of water based on future population demographics. As discussed previously, the proposed project would generate a water demand of approximately 72,570 gallons per day, which would be less than what was projected in the PDMWD UWMP. As such, water supplies are projected to exceed the needs of the PDMWD service area and would adequately cover the demands of the proposed project (PDMWD 2020). Therefore, the proposed project would not require new or expanded water entitlements for the PDMWD service area, and there would be sufficient water supplies to serve the project site. No new or expanded water supplies are needed. Based on the analysis above, the proposed project's contribution to cumulative impacts on water supply would be less than cumulatively considerable. No additional mitigation would be required.

Cumulative Threshold 3: Would implementation of the proposed project have a cumulatively considerable contribution to a cumulative public-services impact, considering past, present, and probable future projects' wastewater-treatment capacity?

The geographic context for the cumulative assessment of wastewater impacts is the PDMWD service area. As noted in Chapter 3, Environmental Analysis, of this EIR, the cumulative scenario for this EIR includes additional City of Santee and City of San Diego projects, which also would be located within the PDMWD service area. As with the proposed project, City of Santee and City of San Diego projects (and other projects within the service area), would be required to comply with applicable policies and zoning regulations that promote water conservation and minimize impacts related to wastewater generation. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects in the PDMWD service area, would not result in a significant cumulative impact associated with wastewater service and infrastructure. The cumulative impact would be less than significant. No additional mitigation would be required.

Cumulative Threshold 4: Would implementation of the proposed project have a cumulatively considerable contribution to a cumulative public-services impact, considering past, present, and probable future projects' generation of solid waste?

The geographic context for the cumulative assessment of solid waste impacts includes the landfills that serve the City of Santee and other cities in the region. As with the proposed project, other City of Santee and City of San Diego projects, as well as other projects within the service areas of Sycamore Landfill, would be required to comply with applicable policies and zoning regulations that require municipalities to adopt an integrated waste management plan and establish objectives, policies, and programs related to waste disposal, management, source reduction, and recycling. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects in the service area of Sycamore Landfill, would not result in a significant cumulative impact associated with solid waste. The cumulative impact would be less than significant. No additional mitigation would be required.

Cumulative Threshold 5: Would implementation of the proposed project have a cumulatively considerable contribution to a cumulative public-services impact, considering past, present, and probable future projects' compliance with federal, state, and local management and reduction statutes and regulations related to solid waste?

The geographic context for the cumulative assessment of impacts relative to compliance with federal, state, and local management and reduction statutes and regulations for solid waste includes the landfills that serve the City

of Santee and other cities in the region. As with the proposed project, other City of Santee and City of San Diego projects, as well as other projects within the service areas of Sycamore Landfill, would be required to comply with applicable management and reduction statutes and regulations. Similar to the proposed project, all cumulative projects would be required to adhere to the laws that require waste to be separated and tracked to divert it from landfills, with a target of recycling a minimum 65% of construction and demolition debris during construction. In addition, cumulative projects would be required to adhere to the City of Santee's Construction and Demolition Recycling Ordinance and the City of Santee's Municipal Code, Chapter 9. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects in the service area of Sycamore Landfill, would not result in a significant cumulative impact associated with complying with federal, state, and local management and reduction statutes and regulations related to solid waste. The cumulative impact would be less than significant. No additional mitigation would be required.

3.17.7 Summary of Significant Impacts

Table 3.17 1 provides a summary of the project's significant utility- and service-systems impacts and corresponding mitigation measures.

Table 0-1. Summary of Significant Utility and Service Systems Impacts and Mitigation Measures

Summary of Potentially Significant Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact UTIL-1: Construction of Utilities Has the Potential to Result in Significant Impacts to the Environment.	Mitigation measures to reduce project impacts have been identified throughout this EIR, including Section 3.2, Air Quality and Health Risks; Section 3.3 Biological Resources; Section 3.4, Cultural and Tribal Cultural Resources; Section 3.6, Geology and Soils; and Section 3.12, Noise and Vibration.	Less than significant.	All impacts would be reduced to a less-than-significant level with mitigation.

3.17.8 References

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PDMWD. 2022. *District Fact Sheet*. Available: <https://www.padredam.org/DocumentCenter/View/6321/Padre-Dam-Fact-Sheet>. Accessed: July 26, 2023.

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3.18 Wildfire

3.18.1 Overview

This section describes the existing wildfire conditions of the Carlton Oaks Country Club and Resort Project (project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. Potential wildfire impacts resulting from construction and operation of the proposed project were evaluated based on a review of existing resources and data, and applicable laws, regulations, guidelines, and standards. This section focuses on the effect of the proposed project on wildfire risk. Fire protection services for the proposed project are addressed in Section 3.14, Public Services. This section references information provided in the *Fire Protection Plan (FPP)* and *Wildfire Evacuation Plan*, included as Appendices R1 and R2, respectively, of this Environmental Impact Report (EIR).

3.18.2 Environmental Setting

3.18.2.1 Project Location

The project site is within the jurisdictions of the Cities of Santee and San Diego and currently contains a 145-acre, 18-hole golf course; a 52-room hotel; and a country club. The project site is adjacent to primarily residential development to the north, State Route (SR-) 52 on the south, an open space area with hiking trails off of Carlton Hills Boulevard on the east, and West Hills Parkway on the west. Due to its proximity to the nearby open space area, the project site is identified as within a wildland-urban interface (WUI) location that is in an area statutorily designated as a Local Responsibility Area (LRA). As seen in Figure 3.18-1, CAL FIRE Fire Hazard Severity Zones, approximately 25% of the project site is in a fire hazard severity zone (Moderate, High, or Very High). The westernmost portion of the project's developed area is within a High Fire Hazard Severity Zone (HFHSZ) and a Very High Fire Hazard Severity Zone (VHFHSZ), while the eastern developed areas are outside designated FHSZs. The VHFHSZ occurs on the extreme western 10% of the project site mostly within the City of Santee jurisdiction and a small area within the City of San Diego jurisdiction. The City of Santee Fire Department (SFD) is the primary responding unit for the project site.

Fire environments are dynamic systems and include many types of environmental factors and project site characteristics. Fires can occur in any environment where conditions are conducive to ignition and fire movement. Areas of naturally vegetated open space are typically comprised of conditions that may be favorable to wildfire spread. The three major components of the fire environment are topography, vegetation (i.e., fuels), and climate. The state of each of these components and their interactions with each other determines the potential characteristics and behavior of a fire at any given moment.

3.18.2.2 Topography

As described in the FPP (Appendix R1), topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up-slope and slower fire spread downslope in the absence of wind. Terrain that forms a funneling effect, such as chimneys, chutes, and saddles on the landscape, can result in especially intense fire behavior. Conversely, flat terrain tends to have little effect on fire spread, resulting in fires that are driven by wind. Topographic features that may present a fire spread facilitator are slopes and canyon alignments, which may serve to funnel or channel winds, thus increasing their velocity and potential for influencing wildfire behavior.

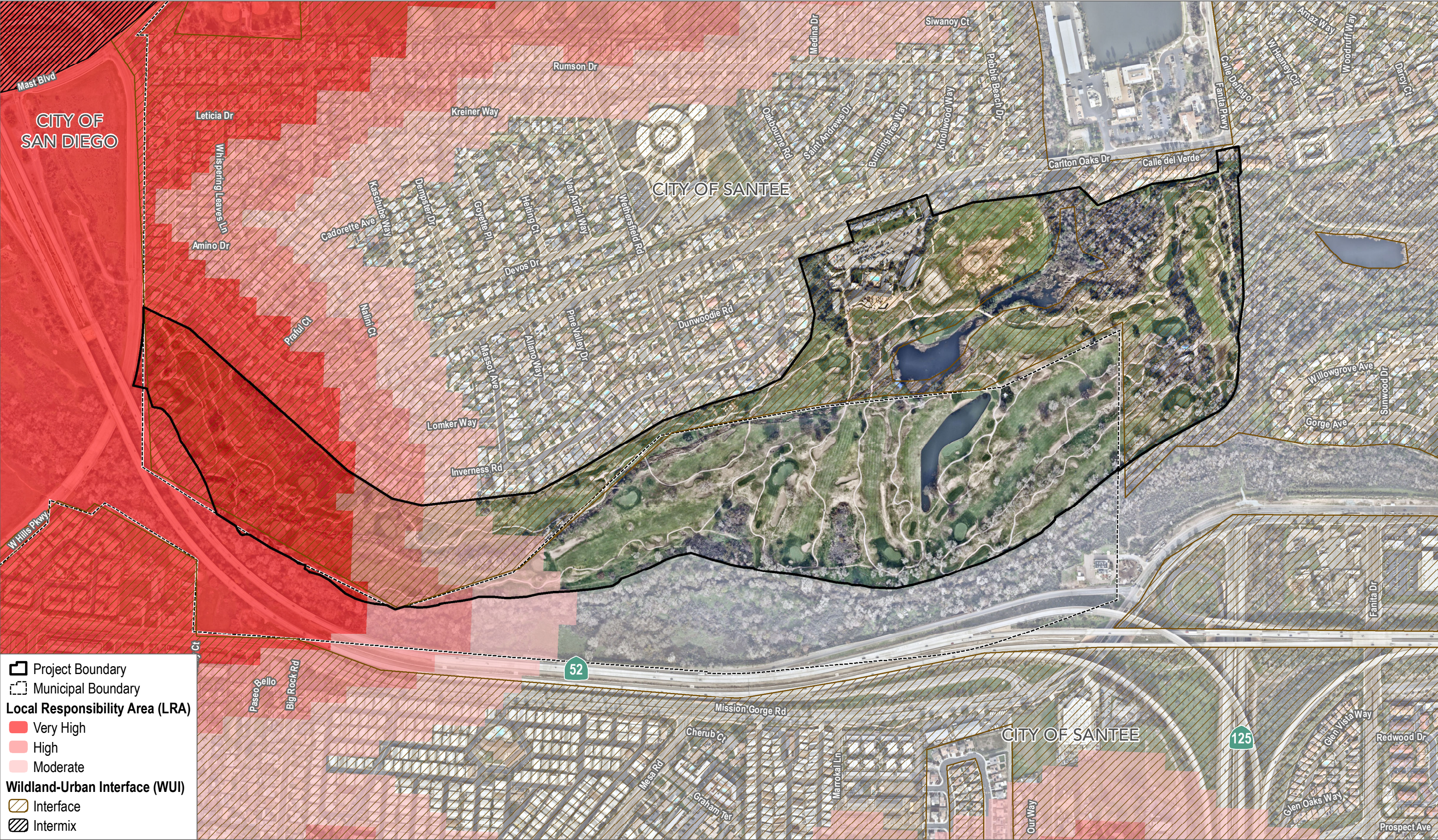
Topography on the project site is relatively flat because it is within the historical floodplain of the San Diego River. Elevations within the project site range from approximately 727 feet above mean sea level at the southwestern property boundary to approximately 1,022 feet above mean sea level. Topography at and near the project site does not include fire facilitating features.

3.18.2.3 Climate

The project site, like much of Southern California climate, has a large influence on fire risk. The climate of San Diego County is typical of a Mediterranean area, with warm, dry summers and wetter winters. The prevailing wind is an onshore flow from the Pacific Ocean with fall Santa Ana winds from the northeast that may gust up to 50 miles per hour (mph) or higher. Drying vegetation (i.e., fuel moisture of less than 5% for 1-hour fuels is possible) during the summer months becomes fuel that is available to advancing flames, should an ignition occur. The average high temperature for the project site is approximately 77 °F, with average daily highs in the summer and early fall months (i.e., June–October) averaging 84 °F (Weather Spark 2022). Precipitation typically occurs between December and April, with average rainfall of 12 inches.

From a regional perspective, the fire risk in Southern California can be divided into three distinct “seasons.” The first season, the most active season and covering the summer months, extends from late May to late September. This is followed by an intense fall season characterized by fewer, but larger, fires. This season begins late September and continues until early November. The remaining months, November to late May, cover the mostly dormant winter season. Mensing et al. (1999) and Keeley and Zedler (2009) found that large fires in the region consistently occur at the end of wet periods and the beginning of droughts. Typically, the highest fire danger in Southern California coincides with Santa Ana winds, which are a reversal of the prevailing southwesterly winds that usually occur on a region-wide basis near the end of the fire season, during late summer and early fall. These dry, warm winds flow from the higher desert elevations in the east through the mountain passes and canyons. As they converge through the canyons, their velocities increase. Consequently, peak velocities are highest at the mouths of canyons and dissipate as they spread across valley floors. Localized wind patterns on the project site are strongly affected by both regional and local topography.

The prevailing wind pattern is from the west (i.e., onshore), but the presence of the Pacific Ocean causes a diurnal wind pattern known as the *land/sea breeze system*. During the day, winds are from the west–southwest (i.e., the sea) and at night winds are from the northeast (i.e., the land), averaging 2 mph. During the summer season, the diurnal winds may average slightly higher (i.e., approximately 19 mph) than the winds during the winter season due to greater pressure-gradient forces. Surface winds can also be influenced locally by topography and slope variations. The highest wind velocities are associated with downslope, canyon, and Santa Ana winds. The project site does not include topography that would create unusual weather conditions; however, the open space areas to the north and west of the project site would be subject to periodic extreme fire weather conditions that occur throughout San Diego County and could result in fire ignition on site (Appendix R1, *Fire Protection Plan*).



SOURCE: USFS 2023; mCAL FIRE 2024; SANGIS 2025

FIGURE 3.18-1
CAL FIRE Fire Hazard Severity Zones
Carlton Oaks EIR

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3.18.2.4 Vegetation

As described in the FPP (Appendix R1), vegetation characteristics are used to predict fire behavior characteristics. Extensive vegetation-type mapping is useful for fire planning because it enables each vegetation community to be assigned a fuel model, which is used in a software program to predict fire behavior characteristics considered in the Fire Behavior Modeling section discussed in the FPP (Appendix R1). 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 (e.g., resin content), biological function (e.g., flowering, retention of dead plant material), physical structure (e.g., bark thickness, leaf size, branching patterns), and overall fuel loading. Additionally, vegetative cover influences fire suppression efforts through its effect on fire behavior. For example, although fires burning in grasslands may exhibit lower flame lengths and heat outputs than those burning in native shrub habitats, fire spread rates in grasslands are often more rapid.

Based on the project's *Biological Survey Report* (Appendix E), 13 vegetation communities, including coastal and valley freshwater marsh, developed (including golf course), Diegan coastal sage scrub – disturbed, disturbed habitat, disturbed wetland, eucalyptus woodland, freshwater (jurisdictional ponds), mule fat scrub – disturbed, nonnative grassland, nonnative riparian, southern cottonwood–willow riparian forest (including disturbed), and southern riparian scrub. Overall, the majority of the project site (approximately 80%) is composed of developed and disturbed habitats, with the remainder (i.e., 20%) consisting of natural habitats.

Post-development vegetation composition proximate to the project footprint is expected to be significantly different than current conditions. Following build-out, irrigated and thinned landscape vegetation associated with fuel modification zones (FMZs) would be located in the immediate area surrounding the planning areas, extending 100 horizontal feet from structures. An FMZ is a strip of land where combustible vegetation has been removed and/or modified and partially or totally replaced with more adequately spaced, drought-tolerant, fire-resistant plants in order to provide a reasonable level of protection to structures from wildland fire. FMZs are designed to provide vegetation buffers that gradually reduce fire intensity and flame lengths from advancing fire by strategically placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other on the perimeter of the WUI-exposed structures. The California Department of Forestry and Fire Protection (CAL FIRE) describes typical FMZs as consisting of Zone 0: 0 feet to 5 feet from the structure, Zone 1: 5 feet to 30 feet from the structure, and Zone 2: 30 feet to 100 feet from the structure, or until the property line. The FMZ surrounding the project structures would be consistent with requirements, have native and naturalized vegetation occurring within FMZ Zone 2, and is not expected to be irrigated, although overall fuel volumes would be reduced by removing dead and dying plants, nonnatives, and highly flammable species and thinning the remaining plants so they would not readily facilitate the spread of fire. Furthermore, the FMZs would be maintained on an ongoing basis.

3.18.2.5 Regional and Local Wildfire Risk

A *wildfire* is a nonstructural fire that occurs in vegetative fuels, excluding prescribed fire. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition-resistant. The potential for wildland fires represents a hazard where development is adjacent to open space or within close proximity to wildland fuels or designated fire severity zones. The hot, arid climate of the City of Santee and County of San Diego, in general, but especially during the summer and fall, can dry out vegetation, and dry brush can be prone to fires caused by a variety of potential ignition sources. Fires that occur in WUIs may affect natural resources, life, and property.

According to available data from CAL FIRE's Fire and Resources Assessment Program (FRAP) database (CAL FIRE 2024), 44 fires were recorded from 1910 to 2021 within 5 miles of the project site (Appendix R1, *Fire Protection Plan*). The fires ranged from approximately 24 acres to 270,686 acres (i.e., 2003 Cedar Fire), and the average fire size was approximately 964 acres (not including the 2003 Cedar Fire or fires smaller than 10 acres).

3.18.2.6 Fire Hazard Designations

CAL FIRE has mapped areas of significant fire hazards in the state through its FRAP database (CAL FIRE 2024). These maps place areas of the state into different fire hazard safety zones (FHSZs), based on a hazard-scoring system that uses subjective criteria for fuels, fire history, terrain influences, housing density, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. As part of this mapping system, land where CAL FIRE is responsible for wildland fire protection—and generally located in unincorporated areas—is classified as a State Responsibility Area (SRA). Where local fire protection agencies, such as the SFD, are responsible for wildfire protection, the land is classified as an LRA.

Fire and Emergency Response

City of Santee Fire Department

SFD's service area, covering 16.5 square miles, serves a population of approximately 60,000 people. SFD protects an extremely diverse community consisting of large areas of residential development, commercial/retail centers, office buildings, and industrial parks. Additionally, SFD protects and manages several thousand acres of wildland and wildland-urban interface lands. SFD has two fire stations and a fire administration building (City of Santee 2024).

Two SFD fire stations are within the project vicinity and would respond in an emergency:

- **Station 5 at 9130 Carlton Oaks Drive:** Approximately 0.5 miles east of the Carlton Oaks Drive entry to the project site.
- **Station 4 at 8950 Cottonwood Avenue:** Approximately 2.7 miles east of the Carlton Oaks Drive entry to the project site.

Station 5, the primary responding unit for the project site, has two fire engines and a paramedic ambulance. Station 4 has a fire engine, a fire truck, a paramedic ambulance, and a brush engine.

City of San Diego Fire-Rescue Department

The City of San Diego Fire-Rescue Department (SDFD) service area covers 343 square miles; SDFD is responsible for 17 miles of coastline extending 3 miles offshore and serves a population of approximately 1,419,845 people. SDFD has 52 fire stations and 9 permanent lifeguard stations (31 seasonal stations during peak period). SDFD employs approximately 949 uniformed personnel, 98 permanent uniformed lifeguard personnel, and 246 civilian personnel, for a total of 1,293 personnel (SDFD 2023).

Four SDFD fire stations are within the project vicinity and would respond in an emergency:

- **Station 34 at 6565 Cowles Mountain Boulevard:** Approximately 3 miles south of the project site.
- **Station 31 at 6002 Camino Rico:** Approximately 4.8 miles southwest of the project site.

- **Station 44 at 10011 Black Mountain Road:** Approximately 7.7 miles northwest of the project site.
- **Station 39 at 4949 La Cuenta Drive:** Approximately 5.4 miles southwest of the project site.

Station 34, the primary responding unit for the portion of the project site within the City of San Diego, has one engine and one brush engine.

Emergency Response Plans

Emergency response plans include elements to maintain continuity of government, emergency functions of governmental agencies, mobilization and application of resources, mutual aid, and public information. Emergency response plans are maintained at the federal, state, and local levels for all types of disasters, both natural and human-caused. Local governments have the primary responsibility for preparedness and response activities.

In the 1960s, the Unified San Diego County Emergency Services Organization was formed under a Joint Powers Agreement. The Unified Disaster Council, the governing body, prepares plans and policies for the County. The San Diego County Operation Area (OA) was formed to assist all of the cities and communities in the County in developing and implementing emergency plans and facilitating mutual aid agreements.

County of San Diego Operational Area Emergency Operations Plan

The *County of San Diego Operational Area Emergency Operations Plan* (OA EOP) was approved by the San Diego Board of Supervisors in August 2022. Each city is encouraged to adopt the OA EOP, which outlines a comprehensive emergency management system that provides response to disaster situations, such as natural disasters, technological incidents, terrorism, and nuclear-related incidents. It also describes responsibilities of the jurisdictions and agencies within the OA (County of San Diego 2022).

The County of San Diego, including the City of Santee and City of San Diego, uses the OA EOP to respond to major emergencies and disasters (County of San Diego 2022). The OA EOP identifies a broad range of potential hazards and a response plan. According to Annex Q, *Evacuation*, primary evacuation routes identified in the OA EOP consist of the major interstates, highways, and prime arterials within the County of San Diego (County of San Diego 2022).

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The purpose of the County's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) (County of San Diego 2023) 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 and reduce or eliminate long-term risks to people and property from natural and human-caused hazards. The City of Santee and City of San Diego participate in the MJHMP.

An important component of the MJHMP is the Community Emergency Response Team, which educates community members about disaster preparedness and trains them in basic response skills, such as fire safety, light search and rescue, and disaster medical operations.

City of Santee

The 2010 MJHMP was incorporated into the City of Santee's *General Plan* by resolution 08-2011 on February 9, 2011, and was last revised in 2018. The MJHMP facilitates cross-jurisdictional coordination for minimizing hazard risk and response to emergency events (County of San Diego 2023). The MJHMP was developed with the intent of

enhancing public awareness and understanding of potential natural and human-caused hazards, providing policies and decision-making tools, and ensuring compliance with federal and state regulations.

City of San Diego

The City of San Diego also participates in the County MJHMP. The SDFD, Police Department, and the Emergency Operations Center (EOC) are the primary departments responsible for emergency response.

3.18.3 Applicable Laws and Regulations

3.18.3.1 Federal

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code (IBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

International Wildland–Urban Interface Code

The International WUI Code is published by the IFC and is a model code addressing wildfire issues.

Federal Wildland Fire Management Policy

The *1995 Federal Wildland Fire Management Report* (DOI-USDA 1995) produced the first single comprehensive federal fire policy for the U.S. Departments of the Interior and Agriculture. That review was stimulated by the 1994 fire season, with its 34 fatalities, and growing recognition of fire problems caused by fuel accumulation. The resulting 1995 Federal Fire Policy codified, for the first time, the essential role of fire in maintaining natural systems.

In the aftermath of the escape of the Cerro Grande Prescribed Fire in May of 2000, the Secretaries of the Interior and Agriculture requested a review of the 1995 Federal Fire Policy and its implementation and updated its policies in the *2001 Review and Update of the 1995 Federal Wildland Fire Management Policy* (DOI-USDA et al. 2001). In 2009, the National Wildfire Coordinating Group adopted the *Guidance for Implementation of Federal Wildland Fire Management Policy* (NWCG 2009), which replaced the previous 2003 strategy for implementing the Wildland Fire Policy. The *Guidance for Implementation of Federal Wildland Fire Management Policy* outlines the following guidelines that should be used to provide consistent implementation of federal Wildland Fire 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.

Disaster Mitigation Act

The Disaster Mitigation Act of 2000 requires that a state mitigation plan, as a condition of disaster assistance, add incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two different levels of state plans: *Standard* and *Enhanced*. States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Disaster Mitigation Act also established a new requirement for local mitigation plans.

National Incident Management System

The National Incident Management System (NIMS) guides all levels of government, nongovernmental organizations, and the private sector in working together to prevent, protect against, mitigate, respond to, and recover from incidents. NIMS provides community members with a shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System, a Presidential Policy Directive that established a common goal of creating a secure and resilient nation, associated with prevention, protection, mitigation, response, and recovery to address the greatest risks to the nation. One core area is fire management and -suppression. NIMS defines operational systems that guide how personnel work together during incidents.

Pet Evacuation and Transportation Standards Act

The Pets Evacuation and Transportation Standards Act of 2006 amends the Stafford Act, and requires evacuation plans to take into account the needs of individuals with household pets and service animals, prior to, during, and following a major disaster or emergency.

3.18.3.2 State

California Emergency Services Act

The California Emergency Services Act (AB 1303, 2023) was adopted to establish the state's roles and responsibilities during human-caused or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or resources of the state. This act is intended to protect health and safety by preserving the lives and property of the people of the state.

California Natural Disaster Assistance Act

The California Natural Disaster Assistance Act (California Code of Regulations [CCR] Title 16, Chapter 6, 2018) provides financial aid to local agencies to assist in the permanent restoration of public real property, other than facilities used solely for recreational purposes, when such real property has been damaged or destroyed by a natural disaster. The California Natural Disaster Assistance Act is activated after a local declaration of emergency and the California Emergency Management Agency gives concurrence with the local declaration, or after the governor issues a proclamation of a state emergency. Once the act is activated, the local government is eligible for certain types of assistance, depending on the specific declaration or proclamation issued.

California Department of Forestry and Fire Protection

CAL FIRE protects the people of California from fires, responds to emergencies, and protects and enhances forest, range, and watershed values, providing social, economic, and environmental benefits to rural and urban citizens. CAL FIRE's firefighters, fire engines, and aircraft protect California's wildlands from wildfires. The Office of the State Fire Marshal supports CAL FIRE's mission by focusing on fire prevention and providing support through a wide variety of fire safety responsibilities, including by regulating buildings in which people live, congregate, or are confined, controlling substances and products that may, in and of themselves, or by their misuse, cause injuries, death, and destruction by fire, providing statewide direction for fire prevention in wildland areas, regulating hazardous liquid pipelines, reviewing regulations and building standards, and providing training and education in fire protection methods and responsibilities.

2018 Strategic Fire Plan for California

The *2018 Strategic Fire Plan for California* (2018 Plan) is a cooperative effort between the California State Board of Forestry and Fire Protection (State Forest Board) and CAL FIRE (2018).

The State Forest Board has adopted fire plans since the 1930s and periodically updates them to reflect current and anticipated needs. Over time, as the environmental, social, and economic landscape of California's wildlands has changed, the Board has evolved the Strategic Fire Plan to better respond to these changes and to provide the CAL FIRE with appropriate guidance "for adequate statewide fire protection of state responsibility areas" (California Public Resource Code [PRC] Section 4130). In 2018, the State Board of Forestry and Fire Protection adopted a new strategic fire plan to update and address fire concerns in California (State Forest Board and CAL FIRE 2018). The 2018 Plan calls 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 federal, state, tribal, local, and private partnerships.

The goals that are critical to achieving the 2018 Plan's vision revolve around fire prevention, natural resource management, and fire suppression efforts, as broadly construed. Major components include the following:

- Improve the availability and use of consistent, shared information about hazard and risk assessment.
- Promote the role of local planning processes, including General Plans, new development, and existing developments, and recognize individual landowner/homeowner responsibilities.
- Foster a shared vision among communities and the multiple fire-protection jurisdictions, including county-based plans and community-based plans, such as Community Wildfire Protection Plans.

- Increase awareness and actions to improve fire resistance of human-made assets at risk and fire resilience of wildland environments through natural resource management.
- Integrate implementation of fire and vegetative fuels-management practices consistent with the priorities of landowners or managers.
- Determine and seek the needed level of resources for fire prevention, natural resource management, fire suppression, and related services.
- Implement needed assessments and actions for post-fire protection and recovery.

California Public Resources Code

Fire Hazard Severity Zones – Public Resources Code Sections 4201–4204

In 1965, PRC Sections 4201–4204 directed CAL FIRE to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, referred to as FHSZs, define the application of various mitigation strategies to reduce risk associated with wildland fires. Fire hazard designations are based on topography, vegetation, and weather, among other factors, with higher hazard–category sites, including steep terrain, unmaintained fuels/vegetation, and WUI locations. Projects situated in VHFHSZs require fire hazard analysis and application of fire protection measures that have been developed to specifically result in defensible communities in these WUI locations. As shown on Figure 3.18-1, CAL FIRE Fire Hazard Severity Zones, portions of the project site are within an area that CAL FIRE has designated as a VHFHSZ, HFHSZ, and Moderate Fire Hazard Severity Zone (MFHSZ). The far western portion of the site where Residential West is proposed is within the VHFHSZ and within the City of Santee’s jurisdiction; a small portion is also within the City of San Diego jurisdiction.

Defensible Space – Public Resources Code Section 4291

Under PRC Section 4291, a minimum of 100 feet of defensible space must be maintained around all structures or buildings in, on, or adjoining a mountainous area, forest-covered lands, shrub-covered lands, grass-covered lands, or land that is covered with flammable material.

Government Code Sections 51175–51189, Very High Fire Hazard Severity Zones

In 1992, Government Code Sections 51175–51189 established the classification for VHFHSZ, which was based on fuel loading, terrain, weather, and other relevant factors CAL FIRE identified as major causes of wildfire spread and on the severity of fire hazard that is expected to prevail in those areas. The code established the requirements for those who maintain an occupied dwelling within a designated VHFHSZ. The VHFHSZs define the application of mitigation measures to reduce risk associated with uncontrolled wildfires and require that the measures be taken. Local agencies designate the VHFHSZs within their jurisdiction, as required by CAL FIRE.

Senate Bill 1241

In 2012, Senate Bill (SB) 1241 added Section 66474.02 to California Government Code Title 7, Division 2, commonly known as the Subdivision Map Act. This statute prohibits subdivision of parcels designated as very high fire hazards, or that are in an SRA, unless certain findings are made prior to approval of the tentative map. The statute requires that a city or county planning commission make three new findings regarding fire hazard safety before approving a subdivision proposal: (1) the design and location of the subdivision and its lots must be consistent with defensible space regulations found in PRC Sections 4290–4291; (2) structural fire protection

services must be available for the subdivision through a publicly funded entity; and (3) ingress and egress road standards for fire equipment must meet per any applicable local ordinance and PRC Section 4290.

California Building Code and Fire Code

The California Building Standards Code (CBC) (CCR Title 24) is a compilation of building standards, including fire safety standards for residential and commercial buildings, which serve as the basis for the design and construction of buildings in California. The California Fire Code (CFC) is a component of the CBC. Typical fire safety requirements of the CFC include: (1) the installation of sprinklers in all high-rise buildings; (2) the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and (3) the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The CFC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies.

State Fire Regulations

State fire regulations are set forth in California Health and Safety Code Sections 13000 et seq., which include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices (e.g., extinguishers, smoke alarms), high-rise building and childcare-facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned or -occupied buildings and state institutions throughout California.

3.18.3.3 Regional

County of San Diego

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The federal Disaster Mitigation Act of 2000 requires all local governments to create a disaster plan in order to qualify for hazard mitigation funding. The County of San Diego's MJHMP (County of San Diego 2023) is a countywide plan that identifies risks and ways to minimize damage by natural and human-caused disasters. The plan is a comprehensive resource document that serves many purposes, such as enhancing public awareness, creating a decision tool for management, promoting compliance with federal and state program requirements, enhancing local policies for hazard mitigation capability, and providing interjurisdictional coordination.

Each of the 18 cities in the County of San Diego participated in the planning process, as well as the City of Santee and Padre Dam Municipal Water District (PDMWD). Based on its review of jurisdictional-level hazard maps, the City of Santee identified approximately 45,353 people, 16,283 residential structures, 5,307 commercial structures, and 130 critical facilities that are exposed to wildfire/structure fire hazards (Fire Regime, Classes II and IV) (City of Santee 2023).

The MJHMP addresses wildfire risk within the San Diego region by assessing the exposure to wildfire hazard of populations in the different jurisdictions within the region. The assessment includes exposure of population, residential buildings, and commercial buildings, as well as exposure of critical facilities and infrastructure, such as airports, bridges, and electric power facilities. The plan then outlines goals, objectives, and actions for each jurisdiction within the San Diego region. Goals related to wildfire typically include reducing the possibility of damage and loss from structural/wildfire. Objectives and actions related to wildfire typically include measures such as

updating fire and evacuation plans, maintaining vegetation management policies, and maintaining adequate emergency response capability.

Operational Area Emergency Operations Plan

The Office of Emergency Services implements the OA EOP (County of San Diego 2022) in collaboration with the Unified San Diego County Emergency Services Organization. The OA EOP is for use by the County of San Diego, and all the cities within the County of San Diego, to respond to major emergencies and disasters. It describes the roles and responsibilities of all County of San Diego departments (including many City of San Diego departments), and the relationship between the County of San Diego and its departments and the jurisdictions within the County of San Diego. The Plan contains 16 annexes detailing specific emergency operations for different emergency situations.

3.18.3.4 Local

County of San Diego

According to the County of San Diego Code of Regulatory Ordinances, Sections 96.1.005 and 96.1.202, Removal of Fire Hazard, the County Fire Authority, in partnership with CAL FIRE, the Bureau of Land Management, and the U.S. Forest Service, is responsible for the enforcement of defensible space inspections. Inspectors are responsible for ensuring that adequate defensible space has been created and maintained around structures. If violations of the program requirements are noted, then inspectors list the required corrective measures and provide a reasonable time frame in which to complete the task. If violations still exist on re-inspection, the local fire inspector would forward a complaint to the County of San Diego for further enforcement action.

City of Santee

General Plan

Divided into nine elements, the City of Santee's *General Plan* is a statement of intent about the future development of the community. This is accomplished through objectives and policies that serve as a long-term policy guide for physical, economic, and environmental growth.

SFD has not adopted a general time–performance baseline and benchmark for initial response to emergency calls; however the *General Plan's Safety Element* (City of Santee 2003a) states the following:

The Department'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.

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 *Safety Element* identifies areas where private and public decisions on land use need to be responsive to potentially hazardous conditions. It also serves to inform individuals, firms and public agencies of City's policies regarding appropriate levels of public services such as police and fire protection (City of Santee 2003a). The

following existing policies from the City of Santee's *General Plan – Safety Element* are applicable to the proposed project:

- Policy 1.7: Critical Emergency uses (hospitals, fire stations, police stations, the Emergency Operations Center, public administration buildings and schools) shall not be located in flood hazard areas or in areas that would affect their ability to function in the event of a disaster.
- 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.

The following existing policy from the City of Santee's *General Plan – Land Use Element* (City of Santee 2003b) is applicable to the proposed project:

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.

Fire Code

City of Santee Ordinance 605 amended the Santee Municipal Code to formally adopt the 2022 CFC as the City of Santee's Fire Code. Relevant sections of the Fire Code are included below:

4903 (Fire Protection Plan): An FPP, approved by the Fire Chief, shall be required for all new development within declared Fire Hazard Severity Zones and/or Wildland–Urban Interface (WUI) areas. The FPP shall include mitigation measures consistent with the unique problems resulting from the location, topography, geology, flammable vegetation, and climate of the proposed site. The FPP shall address access, water supply, building ignition fire resistance, fire protection systems and equipment, defensible space and vegetation management.

4905.4.1 Combustible fencing: Fencing within Fire Hazard Severity Zones and/or Wildland Urban Interface Areas shall consist of noncombustible or approved materials. The closest five feet of fencing to any structure shall be approved noncombustible.

4905.4.2 Outdoor fireplaces, barbecues and grills: Outdoor fireplaces, barbecues and grills shall not be built, or installed in Fire Hazard Severity Zones and/or Wildland Urban Interface Areas without plan approval by the Fire Code Official. Portable outdoor fireplaces or other wood burning appliances shall be strictly prohibited within Fire Hazard Severity Zones and/or Wildland Urban Interface Areas.

4905.4.3 Spark arresters. Chimneys serving fireplaces, barbecues, incinerators or decorative heating appliances in which solid or liquid fuel are used, shall be provided with a spark arrester of woven or welded wire screening of 12-gauge standard wire having openings not exceeding ¼ inch.

4905.4.5 Water supply. All water systems, specifically fire hydrants and storage tanks, must be approved by the Fire Department. Fire hydrants within Fire Hazard Severity Zones or Wildland Urban Interface Areas shall be spaced every 300 feet and shall have a fire flow of 2500 gallons per minute or a fire flow approved by the Fire Chief. Developments that require new or "stand alone" water storage facilities may also be required to provide secondary or back-up systems, such as independently powered pumps that will ensure adequate water supply for firefighting emergencies.

4907.2 (Fuel Modified Defensible Space): All new developments, subdivisions or tracts that are planned in Fire Hazard Severity Zones and/or Wildland–Urban Interface Areas (WUI) shall have a minimum of 100 horizontal feet of “fuel modified” defensible space between structures and wildland areas. Depending on the percentage of slope and other wildland area characteristics, the Fuel Modified Defensible Space may be increased beyond 100 feet. Fuel Modified Defensible Space shall be comprised of two distinct brush management areas referred to as “Zone One” and “Zone Two.”

4907.2.1 (Fuel Modified Defensible Space, Zone One): “Zone One” is the first 50 feet measured from the structure toward the wildland. This area is the least flammable and consists of pavement, walkways, turf and permanently landscaped, irrigated and maintained ornamental planting. This vegetation should be kept in a well-irrigated condition and cleared of dead material. This area requires year-round maintenance. Fire-resistive trees are allowed if placed or trimmed so that crowns are maintained more than 10 feet from the structure. Highly flammable trees such as, but not limited to, conifers, eucalyptus, cypress, junipers and pepper trees are not allowed in WUI areas. This area shall be maintained by the property owner or applicable homeowners association(s).

4907.2.2 (Fuel Modified Defensible Space, Zone Two): “Zone Two” is the second 50 feet of the 100 total feet of defensible space and is measured 50 feet from the structure to a total of 100 feet toward the wildland. Zone Two shall consist of low-growing, fire-resistant shrubs and groundcovers. Average height of new plants for revegetation should be less than 24 inches. In this Zone, no more than 30% of the native, non-irrigated vegetation shall be retained. This area requires inspection and periodic maintenance. This area shall be maintained by the property owner or applicable homeowners association(s).

4907.2.3 (Defensible space adjacent to roadways): An area of 50 feet from each side of fire apparatus access roads and driveways shall be improved to “Zone One” standards and maintained clear of all but fire-resistive vegetation. This area shall be maintained by the property owner or homeowners associations as with other defensible space areas. Defensible space adjacent to roadways may be increased to more than 50 feet on each side of a fire apparatus access road. This distance is to be determined by the approved FPP.

4908.4 (Storage of Firewood and Combustible Materials): Firewood and combustible materials shall not be stored in unenclosed spaces beneath buildings or structures, or on decks, under eaves, canopies or other projections or overhangs and shall be stored at least 20 feet from structures and separated from the crown of trees by a minimum horizontal distance of 15 feet.

City of San Diego

General Plan

Wildfires are addressed in the City of San Diego’s *General Plan – Public Facilities, Services, and Safety Element* (Policies PF-D.1 through PF-D.20) (City of San Diego 2022). The relevant policies concern the locations for fire stations, equipping and staffing fire stations, response times and service level standards, fire station design standards, personnel training, fire station impacts on adjacent sensitive land uses, and wildfire planning.

Brush Management Policy and Landscape Standards

The City of San Diego's Brush Management Policy and Landscape Standards were adopted in April 2008 and updated in May 2010 (City of San Diego 2010). This policy regulates the construction, alteration, movement, repair, maintenance, and use of any building, structure, or premises within the WUI areas in the City of San Diego. It requires that a Brush Management Plan and Program be processed in conjunction with any development that is required to obtain discretionary grading and/or building permits. The policy also includes requirements for thinning and pruning native/naturalized vegetation within WUI areas and allowable coverage, massing, and spacing for plants that would be retained. If the full brush management zone(s) cannot be provided, then the policy requires that alternative means of fire protection, including fire-rated construction, be identified by SDFD and implemented.

Fire-Rescue Department Fire Access Roadways Policy

SDFD has adopted the Fire Access Roadways Policy to clarify requirements outlined in CFC Section 503 (City of San Diego 2015). Fire access roadways for new and existing buildings are regulated by this policy, which requires buildings to be accessible to emergency vehicles. Under this policy, fire apparatus access roadways must not be less than 20 feet of unobstructed width, must have an adequate roadway turning radius, and must have a minimum vertical clearance of 13 feet, 6 inches.

Municipal Code

Section 301.1.1

The City of San Diego has adopted VHFHSZs, as recommended by CAL FIRE, and adopts the Brush Management Zones as defined in City of San Diego Municipal Code Section 142.0412.

Section 55.0304

City of San Diego Municipal Code Section 55.0304 regulates the management of combustible waste material, including vegetation, by requiring vegetation clearance in WUI areas in accordance with CFC Chapter 49 and the City of San Diego Land Development Code. Furthermore, this code requires persons who own, control, operate, or maintain electrical-transmission or -distribution lines to have an approved program in place that identifies poles or towers with equipment and hardware types that have a history of becoming an ignition source and provides a combustible free space consisting of a clearing of not less than 10 feet in each direction from the outer circumference of such pole or tower during such periods of time as designated by the Fire Code Official.

Section 142.0412(i-j)

City of San Diego Municipal Code Section 142.0412 requires brush management in all base zones on publicly or privately owned properties that are within 100 feet of a structure and contain native or naturalized vegetation. This code allows for brush management activities within environmentally sensitive lands, excluding wetlands, which are located within 100 feet of an existing structure. Brush management in wetlands may be requested with a development permit in accordance with CFC Section 143.0110, where the Fire Chief deems brush management necessary. Where brush management is required, a comprehensive program is required to be implemented that reduces fire hazards around structures by providing an effective fire break between all structures and contiguous areas of native or naturalized vegetation. The code requires this fire break to consist of two distinct brush management areas called *Zone One* and *Zone Two*. *Zone One* is the area adjacent to the structure and must be least flammable and typically

consist of pavement and permanently irrigated ornamental planting. Zone Two is the area between Zone One and any area of native or naturalized vegetation and typically consists of thinned, native, or naturalized non-irrigated vegetation. The code specifies specific brush management measures and landscape standards for these zones and requires that the width of Zone One and Zone Two not exceed 100 feet. A site-specific plan that includes brush management measures is required to establish Brush Management Zones One and Two for new development. Brush management activities are prohibited within coastal sage scrub, maritime succulent scrub, and coastal sage-chaparral habitats from March 1 through August 15, except where documented to the satisfaction of the City Manager that the thinning would be consistent with conditions of species coverage described in the City of San Diego's MSCP Subarea Plan.

Article 5, Division 7

The City of San Diego's Municipal Code (Article 5, Division 7) addresses additions and modifications to Chapter 7 of the CBC, including requirements for building codes in VHFHSZs in the City of San Diego.

3.18.4 Project Impact Analysis

3.18.4.1 Methodology

Analysis of potential impacts related to wildfire was based on the ability of fire personnel to adequately serve the existing and future population of the project site, as well as federal, state, and local regulations regarding wildfire.

Project Design Features

The project proponent would implement the following project design features (PDFs) to help reduce impacts relating to wildfire (the full text of these PDFs can be found in Chapter 2, Project Description):

PDF-11: Fire Protection Measures

PDF-12A: Traffic Control Plan

3.18.4.2 Thresholds of Significance

The following significance criteria are based on State CEQA Guidelines Appendix G and provide the basis for determining significance of impacts associated with wildfire resulting from the implementation of the proposed project:

Impacts would be considered significant if the proposed project were to result in any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan.
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
3. Require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment.

4. 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.
5. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

3.18.5 Project Impacts and Mitigation Measures

Threshold 1: Would implementation of the proposed project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Discussion

An emergency plan describes a comprehensive emergency management system that provides for the planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. The City of Santee and the City of San Diego use the OA EOP to respond to major emergencies and disasters (County of San Diego 2022), and each of the jurisdictions has adopted the County's MJHMP.

The proposed project would have a significant impact if it were to interfere with the OA EOP or the respective jurisdiction's MJHMP.

The County, like most California emergency operations agencies, has adopted evacuation procedures in accordance with the State of California's Standardized Emergency Management System (SEMS) and NIMS. Large-scale evacuations are complex, multi-jurisdictional efforts that require coordination between many agencies and organizations. Emergency services and other public safety organizations play key roles in ensuring that an evacuation is effective, efficient, and safe.

Evacuation during a wildfire is not necessarily directed by the fire agency, except in specific areas where fire personnel may enact evacuations on-scene. The County of San Diego Sheriff's Department (SDSD) has primary responsibility for emergency evacuations, with support from the City's Fire Department. These agencies work closely within the Unified IC System, with the City's EOC and County OES. To that end, the SFD, SDSD, Public Works, Planning, Emergency Services Departments, and California Department of Transportation, amongst others, have worked as part of a Pre-Fire Mitigation Task Force to address wildland fire evacuation planning for the County of San Diego.

The proposed project has developed a project-specific evacuation and emergency response plan (Appendix R2, *Wildfire Evacuation Study*) based on guidance from the City of Santee's Emergency Operations Procedures and County of San Diego EOP including Annex Q, *Evacuation* (County of San Diego 2022). An FPP was also prepared, consistent with the OA EOP and MJHMP, and was approved by the Santee Fire Chief.

The Fire Evacuation Plan outlines strategies, procedures, recommendations, and organizational structures that can be used to implement a coordinated evacuation effort in the case of a wildfire emergency affecting the Carlton Oaks Project. It is noted that the onset of a wildfire or other emergency is generally unplanned, and residents and visitors often would be faced with decisions that need to be made quickly and determined by on-scene first responders or by a collaboration between first responders and designated emergency response teams. Therefore, the Fire Evacuation Plan is to be considered a tool that supports existing pre-plans, but is subservient to emergency event-specific directives provided by agencies managing the event.

Construction

The proposed project would involve the construction of the residential development, a hotel and associated cottages, an improved golf course clubhouse and pro shop, golf course improvements, a learning center, and trail segments. Construction of the proposed project is not expected to result in any substantial traffic queuing on off-site roadways, including along Carlton Oaks Drive, and construction vehicles or equipment would not be allowed to park or remain stationary within off-site roadways. The proposed project's traffic control plan (PDF-12A, Traffic Control Plan) would ensure that the construction phase of the project would not require temporary or permanent closure of off-site roadways, nor block access to off-site uses that would physically impair or otherwise interfere with emergency response or evacuation in the project vicinity. As described in PDF-12A, a traffic control plan would be prepared and implemented for the construction phase (see Chapter 2, Project Description, for the full text of all PDFs). Adherence to the traffic control plan would ensure that emergency response vehicles could safely access the project site and the vicinity and that project construction would not conflict with established emergency evacuation routes.

The proposed project would be required to comply with procedures and measures established in the OP EOP, which has been adopted by both the City of Santee and City of San Diego. Construction activities would also comply with the applicable City of Santee ordinances and regulations related to road closure and roadway construction. Specifically, the aforementioned traffic control plan (i.e., PDF-12A, Traffic Control Plan) would be prepared and implemented during construction as required by the City of Santee and City of San Diego encroachment permits, which are required to be obtained prior to construction of access roads to the proposed residential development and golf resort. The traffic control plan would include procedures that would be followed to properly and safely close lanes and redirect traffic, if necessary, during construction. Adherence to the traffic control plan would ensure that emergency response vehicles could safely access the project site and the vicinity and that project construction would not conflict with established emergency evacuation routes. Furthermore, during an emergency, the proposed project would comply with applicable requirements set forth by the County of San Diego's MJHMP (County of San Diego 2023).

Compliance with the City of Santee and City of San Diego regulations, the measures established by the OP EOP and MJHMP, and the requirements of the traffic control plan would reduce potential impacts associated with interference with applicable emergency response plans to less-than-significant levels.

Operation

The project would not cut off or otherwise modify existing evacuation routes. It would, instead, implement certain roadway improvements and phased or targeted evacuation procedures that would improve evacuation, as discussed in the Fire Evacuation Plan.

Roadway Improvements

The project's interior street network and the existing regional street system that it connects with would provide multi-directional primary and secondary emergency evacuation routes consistent with, or exceeding, most communities in this area. At least two points of primary access for emergency response and evacuation would be provided into the Carlton Oaks community project site: (1) Carlton Oaks Drive to the north; and (2) West Hills Parkway to the west.

The primary evacuation routes, accessed from internal project roadways, lead to Carlton Oaks Drive, West Hills Parkway, Carlton Hills Boulevard, Mission Gorge Road, Cuyamaca Street, and Mast Boulevard. These roads provide access to urbanized areas and major traffic corridors, including SR-125 and SR-52.

The proposed internal roadways would be built according to the currently adopted CFC and Public Works Standards/Alternative Standards. The proposed internal roadways would be unobstructed and include adequate parking, turning radius, grade maximums, and roadside FMZs. All interior residential streets would be designed to accommodate a minimum 77,000-pound fire truck. Vehicular gates for the project would be equipped with vehicle access devices and key switches so that emergency vehicles can override private access gates. All gates would also have a manual-release device or other means to open the gate in the event of power failure. All project roads (including the bridge) would also include at minimum a 50-foot FMZ, which would have specific plant restrictions and maintenance requirements, as detailed in the FPP (Appendix R1).

All internal roadways would be a minimum of 26 feet wide, with the exception of the private streets that provide direct vehicular access to each of the cluster units of four units or fewer. These private cul-de-sac roads would be 20 feet wide, as allowed by the exceptions to CFC Section 503.2.1, which states the following:

Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6,096 mm), exclusive of shoulders, except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches (4,115 mm).

The City of Santee Fire Chief has determined that the 20-foot standards, as set forth in the Development Standards for access to the cluster of four units or fewer, would not impair or impede adequate emergency fire department access to the project site. The proposed project would also provide emergency access that meets current City requirements for the proposed development.

Two emergency access points would also be provided. The first emergency access point would be provided via an extension of Private Drive C westerly to West Hills Parkway. West Hills Parkway would be widened within the existing right-of-way (ROW) from Carlton Oaks Drive, approximately 700 feet south of the existing bridge, to provide a dedicated left-turn lane into Residential West. Emergency access would also be provided to Residential West via an extension of a private drive to West Hills Parkway, which would be 26 feet wide with curb and gutter and asphalt concrete pavement and base, with grades, horizontal alignment, and turnarounds that meet the City of Santee's fire requirements. This emergency access point would be gated and would not be open to the public except during times of emergency. The second emergency access point would be from the existing private driveway at the Vista del Verde Condominiums to the east of the project site. The 26-foot-wide private emergency access road for the Residential North and resort parcels would be provided through the existing Vista del Verde Condominiums, located in the northeastern corner of the project site. A new fence with an emergency access gate would be constructed at the boundary line between the project and the Vista del Verde condominium property. This emergency access road would also meet the City of Santee's Fire requirements.

Access to the golf course/resort and Residential North would occur via a private drive at Carlton Oaks Drive, which would travel southerly across a new steel bridge over the San Diego River (North Channel). The bridge is anticipated to be approximately 265 feet long, and to accommodate two travel lanes (30 feet in width), and a multi-use trail (6 feet in width), for a total width of 36 feet. The superstructure would be steel truss. The bridge is expected to span the San Diego River (North Channel) and would be supported on concrete abutments at its northern and southern extents. The area under the bridge varies between 5 and 12 feet which would be tall enough to accommodate wildlife crossings within the riparian zone and would also accommodate 100-year flood flows. The slopes at the

ends of the bridge would be protected by erosion-control measures, such as rock slope protection to protect the abutments scour during storm events and would have 50-foot roadside fuel modification zone. The bridge onsite will connect the project occupants in the hotel and resort area to Residential North and Carlton Oaks Drive. The proposed bridge, constructed of steel, will be able to withstand fire and will assist in safe and efficient evacuation from the project site. The golf course operator as part of the maintenance of the golf course, will be responsible for proper brush management and defensible space will be cleared underneath the bridge and extending outward from the bridge to meet City of Santee defensible space requirements. Given the lack of vegetation around the bridge, and its construction with steel and fire-resistant materials, the bridge would not be threatened by radiant heat exposure or ember cast from a nearby wildfire event. The project would also include a private utility maintenance road between Residential West and Residential North and golf course parcels. This roadway is not considered a fire apparatus access road but would be built to Fire Code standards and could be used as another emergency evacuation route if needed. It would allow for an additional evacuation route and could provide an additional evacuation route in the event of an emergency.

Homeowner Education

Early evacuation for any type of wildfire emergency at the project site is the preferred method of providing for resident safety, consistently with the current approach used in the County. As such, the project's Homeowner's Association (HOA) would formally adopt, practice, and implement a *Ready, Set, Go!* approach to evacuation. This approach is widely known and encouraged by the State of California and most fire agencies. Preplanning for emergencies, including wildfire emergencies, focuses on being prepared, having a well-defined plan, minimizing the potential for errors, maintaining the project site's fire protection systems, and implementing a conservative approach (i.e., evacuate as early as possible) to evacuation and project site activities during periods of fire weather extremes.

The Carlton Oaks HOA should be active in its outreach to its residents regarding fire safety and general evacuation procedures. Aspects of fire safety and evacuation require a significant level of awareness by the residents and emergency services to reduce and/or avoid problems with an effective evacuation. Mitigating potential impediments to successful evacuations requires focused and repeated information through a strong educational-outreach program. The Carlton Oaks HOA should engage residents and coordinate with local fire agencies for fire safety awareness through a variety of methods.

Annual reminder notices would be provided to each homeowner, encouraging them to review the plan and be familiar with community evacuation protocols. The HOA would coordinate with local fire agencies to hold an annual fire safety and evacuation-preparedness informational meeting, which would be attended by representatives of appropriate fire agencies, and important fire and evacuation information would be reviewed. One focus of these meetings and of the HOA's annual message would be on the importance of each resident preparing and being familiar with their own *Ready, Set, Go!* evacuation plan. This proactive educational component of disclosing the potential wildfire risk would be incorporated into the HOA's covenants, conditions, and restrictions.

Although the development of the proposed project would result in additional residential homes and an increase in the square footage of the current resort, which in turn would result in an increase in the number of employees, residents, and visitors in the area, it would not result in structures or activities that would substantially obstruct or interfere with emergency vehicles or impair emergency response or evacuation plans. By the incorporation of measures that would improve fire prevention and defensibility at the project site, the Fire Department would be able to respond to and extinguish fires promptly in order to keep them from spreading. Although these measures

do not directly address emergency response and evacuation, they show the numerous features that would reduce the need for emergency response and evacuation in the first place.

All buildings within the proposed new development would be constructed in accordance with current building and fire/life/safety ordinances and codes, including all applicable code requirements related to access, water mains, fire flows, and hydrants. The proposed project would implement each of the fire protection features provided as part of the code requirements, or customized for this project as described in the FPP, to protect the site, its structures, and their occupants from wildfires. These features also have a similar positive impact on the potential for wildfire ignitions caused by the project and its inhabitants (Appendix R1, *Fire Protection Plan*). Site access would comply with the requirements of the CFC and City of Santee Municipal Code.

The project site is within the jurisdiction of the SFD, and the closest fire station to the project site is SFD Station 5, located at 9130 Carlton Oaks Drive in the City of Santee. SFD Station 5 is approximately 0.04 miles from the eastern entrance to the project site along Carlton Oaks Drive, and approximately 1.25 miles to the most remote portions of the project site and could respond to an incident within approximately 2 minutes and 47 seconds travel time. Emergency travel times are calculated consistent with nationally recognized National Fire Protection Association (NFPA) 1710 and Insurance Services Office. SFD Fire Station 4, located at 8950 Cottonwood Avenue, is the next-closest SFD station that could respond to the project site. Station 4 is located approximately 3.5 miles from the most remote portion of the project site. In addition, automatic/mutual aid agreements are in place with neighboring fire agencies to augment response, especially at the fringe area of SFD's jurisdiction.

Based on the reasons described above, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact Determination

Implementation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Would Implementation of the proposed project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The wildland fire risk in the vicinity of the project site has been analyzed according to a standard used throughout the County (San Diego County Guidelines for Determining Significance – Wildland Fire and Fire Protection 2010). It has been determined that wildfires may occur in wildland areas near the project site, as they have historically. Additionally, increased vehicle traffic and human presence on the project site could increase the potential for wildfire ignitions during operation. The potential for the proposed project to exacerbate wildfire risks and expose project occupants to pollutant concentrations during construction and operation is discussed below.

Approximately 10% of the project site is located within a VHFHSZ that encompasses predominately the westernmost portion of the site where Residential West is proposed (City of Santee's jurisdiction). The project would implement Chapter 7A of the CBC for all project buildings and the requirements detailed within the Project's FPP that has been prepared in compliance with the requirements of the Santee Municipal Code, Public Works Standards/Alternative Standards, and the California Fire and Building Codes.

As discussed above in Section 3.18.2, Environmental Setting, the topography on the project site is relatively flat because it is within the historical floodplain of the San Diego River, and there are no topographical features that would facilitate aggressive fire spread. The land is generally flat on the western side. The project site is bordered on the north by Carlton Oaks Drive and existing residential development, to the west and south by SR-52, and a mix of residential, commercial, and open space to the east. The potential for wildfire to occur that threatens the Project's built environment are associated with the San Diego River forested banks. Wildfires have occurred within these areas in the past and are primarily caused by unhousehold populations. The vegetation within this area benefits from high internal moisture levels due to the perennial water within the river and their close proximity. Fires in these areas are quickly controlled by SFD. Wildfires in this area and the region were evaluated as part of the FPP's assessment and building setbacks, fuel modification zones, ignition resistant construction, interior fire sprinklers, fast fire department response, and custom measures protect the Project from the anticipated and modeled wildfire intensity and reduce the risk to acceptable levels. These same protections minimize the potential for a fire starting on-site (irrigated landscapes, interior sprinklers, irrigated golf course). Fire ignition on-site would not have fuel sources to easily spread off-site. Prevailing winds (typical) would result in on-shore wind direction (west to east) at low wind speeds. Smoke generated by a wildfire would tend to rise quickly under these conditions above ground level and move to the east. Under a Santa Ana wind condition which occurs very infrequently (10 to 25 times per year), smoke would be blown to the south/southwest, away from the Project. Under these conditions, it is likely that evacuation would be implemented to move people out of the wildfire area. Further, if wildfire occurs that would expose people to pollutants or other hazards, evacuation would be ordered and there are numerous destinations evacuees could be directed to that would remove them from exposures.

Fire protection and emergency response would be provided by SFD and SDFD via a mutual aid agreement. As such, implementation of PDF-11, Fire Protection Measures, and PDF-12A, Traffic Control Plan (refer to Chapter 2, Project Description) would meet or, under certain circumstances, exceed all applicable fire and building code requirements that are designed to (1) minimize the potential for ignitions, (2) provide for structures that are not vulnerable to ignitions, and are tightly constructed and minimize smoke permeation, (3) protect off-site natural areas from on-site fire (through buffers and minimal potential for ignitions), (4) provide for fast fire response, and (5) include an evacuation plan and nearby evacuation destinations. As such, implementation of the proposed project would not, due to slope, prevailing winds, or other factors, exacerbate wildfire risks, nor would the project expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

SFD Fire Station 5, 0.5 miles east of the Carlton Oaks Drive entry, would be the primary responder for the portions of the project site that fall within the City of Santee's jurisdiction. Station 4, 2.7 miles east of the Carlton Oaks Drive entry, would also provide fire protection services to the residential, hotel, clubhouse, and pro shop components of the proposed project. SDFD would provide fire protection services for the portion of the project site, consisting of the golf course, which falls within the City of San Diego's jurisdiction. SDFD's Fire Station 34 is the primary responding unit for the project site and has one engine and one brush engine. The proposed project's impact on response times for fire protection services would be less than significant, as discussed in Section 3.14, Public Services, under Threshold 1.

Impact Discussion

Construction

As noted, the project site is partially located within a VHFHSZ, and heat or sparks from construction equipment or vehicles, as well as the use of flammable materials, have the potential to ignite adjacent vegetation and start a fire. This is especially likely during weather events that include low humidity and the high wind speeds that are typically experienced in the summer and fall but can occur year-round in the San Diego region. The footprints of the development areas fall outside the VHFHSZ area, except for approximately 10% of the site in the westernmost development area. Also, as described in Section 3.18.2.2, Topography, the topography of the site is relatively flat, the site does not contain fire facilitating features, and the majority of the project site (approximately 80%) would consist of disturbed/developed hardscaping or irrigated landscaping. Only approximately 20% of the site would consist of natural habitats.

The potential risk of wildfire ignition and spread associated with construction of the proposed project would be managed and preplanned so that the potential for vegetation ignition along the San Diego River interface is reduced. Measures to reduce risk (PDF-11, Fire Protection Measures) include having adequate water available to service construction activities, implementing a construction phase FPP, providing proper wildfire awareness, reporting, and suppression training to construction personnel, and requiring that all construction phase components of the defensible space (i.e., fuel modification), landscape, and irrigation plans be fulfilled prior to delivery of combustible materials to the project site. Preplanning and construction personnel fire awareness, reporting, and suppression training not only result in lower probability of ignition, but also in higher probability of fire control and extinguishment in its incipient stages. Additionally, the proposed project would reduce the potential flammability of the existing project landscape by converting existing undeveloped space containing ignitable fuels to new buildings and replacing older buildings with new buildings constructed to current codes.

During the construction phase, this development would reduce existing fuel on the project site. The parts of the project site proposed for development would either convert the existing vegetation to a less-flammable, ignition-resistant landscape than under current conditions or replace existing golf course landscaping with more fire-resistant landscape material. Adherence to current building codes and standards, which require defensible space to be provided around all structures located within a VHFHSZ, as well as the measures included in PDF-11, which include having adequate water available to service construction activities, providing proper wildfire awareness, and reporting, and suppression training to construction personnel would reduce wildfire risks during construction. Additionally, before any combustible materials can be brought onto the site for construction, as required by standard fire code regulations, the proposed project must have all underground utilities in place, fire hydrants operational, water mains, curbs, gutters, sidewalks, and an approved all-weather roadway in place, and interim FMZs established and approved (PDF- 11). Therefore, the proposed project would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire during construction, and impacts would be less than significant.

Operation

Southern California has a history of experiencing frequent and intensive wildfires, which have exposed people and structures to substantial loss of life and property. Growth and development in communities adjacent to and within areas designated as VHFHSZs would have the potential to exacerbate wildfire risk by increasing the number of future residents in areas prone to wildfire. However, as stated above, the approximately 10% percent of the proposed project site that is located within a VHFHSZ is within planned developed area and the golf course, which

is irrigated and landscaped. Nevertheless, even though most of the Development Footprint avoids these areas, given its proximity, the project would implement Chapter 7A of the CBC for development in a WUI within a VHFHSZ and the FPP that has been prepared in compliance with the requirements of the Santee Municipal Code

Fire hazard designations are based on topography, vegetation, and weather, amongst other factors, with more hazardous sites including steep terrain, unmaintained fuels/vegetation, and WUI locations. The area, like all of San Diego County, is subject to seasonal weather conditions that can heighten the likelihood of fire ignition and spread; however, the project would implement a system of fire protection features as described below that would reduce the overall risk of ignition.

The proposed project would include a variety of fire protection features that form a redundant system of protection to minimize the likelihood of wildfire exposing people or structures to a significant risk of loss, injury, or death involving wildland fires. The proposed project would provide a fire-hardened landscape, ignition-resistant residences and other buildings, and conversion of fuels to maintained developed areas with designated review of all landscaping and fuel modification areas and highly

Ignition-Resistant Structures

The structures in the proposed project would be built to ignition-resistant standards per the California Fire and Building Codes and the Santee Municipal Code in effect at the time of building permit issuance. Chapter 7-A of the California Building Code and the Santee Municipal Code focus on structural ignition resistance from flame impingement and flying embers. Construction would include enhanced ignition-resistant construction features, installation of automatic interior residential fire-sprinkler systems (conforming to NFPA 13-D requirements), appropriate fire flow and water capacity, roads, and supporting infrastructure.

The ignition-resistant requirements for new communities built in the WUI or VHFHSZs have been determined by state and local fire agencies to provide acceptable resistance to ignition from the types of wildland fires produced by the area's wildland fuels, terrain, and weather. The County conducts after-fire assessments following any wildfire that affects buildings. Following the 2003 Cedar Fire and the 2007 Witch Fire, the County collected a large volume of data that strongly indicate that the building codes are working to prevent residence loss. After-fire assessments of structural losses and saves noted that fewer than 2% of the structures built to 2004 codes were affected, and most of the residences lost were of older, more vulnerable construction (Appendix R1, *Fire Protection Plan*). Many of the newer structures (2003 or 2004) that were lost resulted from human error. The 2022 County Fire and Building Codes reflect additional improvements in technology and materials that result in highly ignition- and ember-resistant structures. When combined with maintained FMZs, fire apparatus access, water (i.e., fire flow), and an equipped and trained responding fire agency on site, all of which would be provided for the proposed project as identified in the FPP (Appendix R1), the result would be a defensible project designed and built to minimize demands on available firefighting resources.

Ignition-resistant project features are required for new development in WUI areas and form the basis of the system of protection necessary to minimize structural ignitions and facilitate access by emergency responders, as identified in the FPP (Appendix R1) and as listed in PDF-11, Fire Protection Measures.

Fuel Modification Zones

Fuel modification would occur throughout the project site and would include a 100-foot wide FMZ. Project access roadways that are adjacent to hazardous fuels would include a minimum 50 feet of FMZ on either side. FMZs would

be maintained by the HOA and/or golf course and inspected annually by a third-party FMZ inspector, along with SFD. All dead and dying materials would be removed, and appropriate horizontal and vertical spacing would be maintained. In addition, plants that are established or are introduced to the FMZ that are not on the approved plant list would be removed so that the FMZs function as intended by reducing fire spread rates and intensity. Landscaping within the project would conform to fire-safe plant palettes, planting densities, and spacing.

The proposed FMZs have been designed to minimize wildfire encroaching on the community and minimize the likelihood that an on-site ignition would spread into the surrounding areas. The proposed FMZs would provide separation from the unmaintained vegetation occurring outside the FMZs, and the FMZs would provide a buffer of reduced fuel densities, lack of fuel continuity, and a reduction in the receptiveness of the landscape to ignition and fire spread.

Therefore, implementation of PDF-11, Fire Protection Measures, and adherence to City of Santee, City of San Diego, and County of San Diego regulations and requirements would reduce potential risks.

Risk from Adding New Residents

In addition, the FPP (Appendix R1) analyzed the wildfire risk associated with adding new residents to the project site. A vast wildland–urban interface already exists in the area near Carlton Oaks, and that area is dominated by older, more fire-vulnerable structures that were constructed before stringent fire code requirements were imposed on residential development, with varying levels of maintained fuel modification buffers.

Research indicates that dense, master-planned developments, like the proposed project, are not associated with increased vegetation ignitions. Although it is true that humans are the cause of most fires in California, in San Diego County, equipment-caused fires are by far the most numerous and also accounted for most of the area burned, followed closely by the area burned by power line fires (Syphard and Keeley 2015). The proposed project would be an ignition-resistant community designed to include professionally managed and maintained fire protection components, modern fire code–compliant safety features, and specific measures provided where ignitions are most likely to occur (Appendix R1, *Fire Protection Plan*). Additionally, the project would benefit from development of the golf course, which would include irrigated, maintained, low fuel, highly ignition-resistant landscapes, and open water and would function as a large fuel break.

This same robust fire protection system would provide protections from on-site fire spreading to off-site vegetation. The landscape throughout the project and on its perimeter would be highly maintained and much of it irrigated (all Zone 1 setback areas, common areas throughout the community and private yards), which would further reduce its ignition potential. Structures would be highly ignition-resistant on the exterior and the interiors would be protected with automatic sprinkler systems, which have a very high success rate for confining fires or extinguishing them. Therefore, accidental fires within the proposed project's landscape areas or on-site structures would have limited ability to spread to the adjacent areas.

The project would result in a conversion of ignitable fuels to lower flammability landscape, managed and maintained landscapes, and generally a reduction in the receptiveness of the area's landscape to ignition. Additionally, the project benefits from the golf course, which includes irrigated and maintained low fuel, highly ignition-resistant landscapes and open water, and functions as a fire break. This would result in a project that is less susceptible to wildfire than surrounding landscapes and that would facilitate firefighter and medical aid response as well as project resident evacuation in a wildfire emergency.

As discussed in Section 2.4.9, Project Design Features, there would be a multipurpose public trail provided on the southern portion of the property, on the northern side of the San Diego River. The project would involve construction of the eastern portion, connecting to the existing Mast Park West Trail, as well as the western portion near West Hills Parkway, with SANDAG to complete the central section. This future trail would increase the number of people utilizing the project site and exposing more people to wildfire risk.

Although more people would be added by the project, an increase in the risk of vegetation ignitions and wildfires and expose of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would not be materially increased because of the requirements listed in PDF-11, Fire Protection Measures, and other factors listed herein.

Impact Determination

The project would implement PDF-11, which requires incorporation of fire protection measures such as ignition-resistant landscaping, FMZs around the perimeter of the project, interior fire sprinklers, ignition resistance structures, and other features during both construction and operational phases. Additionally, the traffic control plan (PDF-12A) would be implemented to ensure that construction vehicles, construction detours, and road closures do not cause conflicts with the ability of emergency vehicles to access the site, or for residents to evacuate the site in the event of an emergency. With implementation of PDF-11 and PDF-12A, implementation of the proposed project would not exacerbate wildfire risks of, or expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: Would implementation of the proposed project require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?

Impact Discussion

Given its partial location within a VHFHSZ, the proposed project would maintain defensible space around project structures, pursuant to PRC 4291. As noted, this would be consistent with the standards outlined in the City of Santee's Municipal Code Section 4907.2 and the City of San Diego's Municipal Code Sections 55.0304 and 142.0412. The proposed project would also comply with all applicable CBC and CFC requirements for development in a VHFHSZ, including, but not limited to, specific requirements for structural hardening, water supply, and flow, hydrant and standpipe spacing, signage, and fire department access. The fire protection measures the project would implement as part of the project design are included in PDF-11, Fire Protection Measures.

Construction

During the construction phase, a system of roads and trails, FMZs, water quality improvements, and service utilities would be constructed as part of the project and would temporarily introduce new potential ignition sources to the

area. The project would comply with CFC Chapter 33 Fire Safety During Construction and Demolition designating fire safety measures to reduce the possibility of fires during construction activities. CFC Chapter 33 includes the following measures: fire watch/fire guards during hot works and heavy machinery activities (e.g., welding), spark arresters on all equipment, requiring fire access during construction, water supply via hose lines attached to hydrants or a water tender pursuant to code requirements, red flag period restrictions, required on-site fire prevention resources, and others. The proposed project would also comply with Title 32, Section 326, of the County Fire Code, Activities in Wildfire Risk Area, which provides safeguards to prevent the occurrence of fire and control the spread of fires that may be caused by activities in a wildfire risk area. The proposed project would comply with all regulatory requirements as described in Threshold 2. Additionally, as outlined in PDF-11, Fire Protection Measures, vegetation management requirements would be implemented at the start of and throughout all phases of construction, and combustible materials would not be brought on site until site adequate fuel breaks are created around all grading, site work, and other construction activities in areas where there is flammable vegetation. Combustible materials would not be brought on site without prior fire department approval. Further, all new permanent powerlines would be undergrounded for fire safety purposes all but eliminating the risk of ignitions via contact between transmission lines and tree canopies, other vegetation, etc. before combustibles are brought on site. Any temporary construction powerlines would only be permitted in areas that have been cleared of vegetation to prevent ignition. PDF-12A, Traffic Control Plan, requires that a traffic control plan be prepared by the applicant and implemented during construction. PDF-12A would ensure that all regulatory requirements are adhered to in all phases of construction on site and off site. Implementation of the regulatory standards and PDFs would reduce the risk of wildfire ignition and spread on the project site during construction activities, and impacts related to construction of the project would be less than significant.

Operations

An important component of a fire protection system for the project is the provision of ignition-resistant landscapes and modified vegetation buffers. As described under Threshold 2, FMZs are designed to provide vegetation buffers that gradually reduce fire intensity and flame lengths from advancing fire (on site or off site) by strategically placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other on the perimeter of the WUI-exposed structures. Fuel treatments can redistribute risk on a landscape and alter the interaction between fire, fuels, and weather (Cochrane et al. 2012). Fuel treatments can also result in a shadow effect on the untreated landscape by altering the probability and timing of burning and affecting wildfire size (Cochrane et al. 2012).

As previously discussed, a portion of the project site is located in a VHFHSZ, and implementation of a Fuel Modification Plan is required by County Fire Code. An approved Fuel Modification Plan has been prepared for the project in accordance with the Per the County Fire Code provisions. In accordance with County Fire Code provisions, the Fuel Modification Plan would include the vegetation management activities described below.

Per the County Fire Code (Title 32, Fire, Section 4908) an FMZ that consists of 30-foot-wide Zone A and a 70-foot-wide Zone B for a total of 100 feet in width¹ is required around habitable structures within the project site. The Santee Municipal Code requires that FMZ be provided around every building that is designed primarily for human habitation or use and building design specifically for house farm animals. Decks, sheds, gazebos, freestanding open-sided shade covers and similar accessory structures less than 250 square feet and 30 feet or more from a dwelling, and fences more than 5 feet from a dwelling, are not considered structures for the purposes of establishing FMZs. FMZs would include 100-foot FMZs (Zones 1, 2, and 3) between the natural open space areas and on-site structures.

¹ In accordance with Section 325.2.2 of the County Fire Code, *Clearance of Brush and Vegetation Growth "Extra Hazard,"* it may be determined by the fire official that some sites pose an extra hazard. In such cases, Fuel Modification Zones may exceed 100 feet but not exceed 200 feet from structures. Based on modeled fire behavior, it was determined that 100-foot FMZs would provide adequate defensible space for the project.

The FMZs would be constructed from the structure outwards towards undeveloped areas. Figure 9 from the FPP illustrates the FMZ Plan proposed for the project site, including a non-combustible zone, Zone 1 Ember Resistant Zone (5 feet wide), a fully-irrigated, limited planting zone, Zone 2 Irrigated Zone (45 feet wide), and a 50% thinning Zone 3 Thinning Zone (50 feet wide), totaling 100 feet of FMZ, which would lessen the spread of fire as it approaches the primary FMZ adjacent to structures. The FMZs would be extending from the structures towards the undeveloped areas.

Roadside FMZs would be provided and maintained for all project roads, including the bridge, and designated fire department access roads. Roadside FMZs would be 50 feet wide from edge of roadways, when adjacent to natural open space areas. Roadside FMZs would include the following restrictions and maintenance requirements:

- No use of undesirable plants (Appendix D of Appendix R1) within this zone.
- Roadside FMZs would be permanently irrigated and replanted with fire resistive plant material to Zone 1 FMZ standards.
- Native or annual grasses would be mowed to 4 inches in height before drying out.
- Single specimen trees, fire-resistive shrubs, or cultivated ground cover (such as green grass, succulents, or similar plants) may be used, provided they do not form a means of readily transmitting fire.

Trees may be planted within the Roadside FMZs. The following criteria must be adhered to:

- Tree spacing to be 20 feet between mature canopies (30 feet if adjacent to a slope steeper than 41%). This may require initial planting spacing of 50 feet on center.
- Trees must be limbed up one-third the height of mature tree or 6 feet above ground, whichever is greater.
- No tree canopies lower than 13 feet 6 inches over travel lanes to allow clearance for emergency response vehicles.
- No trees would be planted that are listed on the Undesirable Plant List (Appendix D of Appendix R1).
- No flammable understory is permitted beneath trees. Any vegetation under trees to be fire resistive and kept to 2 feet in height or below, and no more than one-third the height of the lowest limb/branch on the tree.
- No tree limbs/branches are permitted within 10 feet of a structure.

FMZ south of the maintenance road that connects Planning Areas 1 and 2 would continue to be maintained as part of the golf course area and existing development, as shown on Figure 9 from the FPP. Existing development north of the road provides an FMZ that is superior to a typical roadside FMZ because it includes no wildland fuels and is converted to maintained and irrigated landscapes, hardscape, and structures. The roadside FMZ to the south of this maintenance road would be established on the tentative map, and maintenance within this area would continue to be provided by the golf course as part of its routine and ongoing maintenance.

All power lines within the project site would be undergrounded to reduce fire risk, and the existing power lines along the Carlton Oaks Drive frontage would be undergrounded and several existing driveway aprons would be closed and replaced with curb and landscaping. The proposed bridge that would connect Residential North to the Resort Area includes FMZs on both sides of the bridge in compliance with Fire Code requirements, and the bridge itself would be constructed primarily of steel and concrete and would be fire resistant. Additionally, the bridge crosses an inundated area so the fire risk would be minimal. Lastly, the golf course area is irrigated and this irrigated landscaped area is, in itself, an additional barrier to ignition, even though the golf course is not formally considered to be part of the FMZ.

Consequently, the associated vegetation management activities would not exacerbate fire risk, as the fuel modification and other vegetation management activities would be implemented and enforced during both construction and operations according to PDF-11, Fire Protection Measures; PDF-12A, Traffic Control Plan; and state requirements. The proposed vegetation management activities would reduce the fire risk by thinning or removing combustible vegetation and implementing a landscape plan with more adequately spaced, drought-tolerant, low fuel volume plants in order to provide a reasonable level of protection to structures from wildland fire and provide reasonable protection of wildland areas from structures.

In conclusion, none of the proposed project infrastructure or features required for development in a VHFHSZ would be expected to exacerbate wildfire risk or result in additional temporary or permanent impacts beyond those identified in this EIR. For these reasons, potential impacts to the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, other utilities) that may exacerbate fire risk would be less than significant.

Impact Determination

Implementation of the proposed project would not require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: Would the proposed 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?

Impact Discussion

Wildfires may potentially occur in wildland areas adjacent to the project site, or in on-site undeveloped open space or recreational areas. Under existing conditions, the project site includes potential fire issues, including unmaintained, fire-prone vegetation. Wildfires can greatly reduce the amount of vegetation from hillsides. Plant roots stabilize the soil and aboveground plant parts slow water, allowing it to percolate into the soil. Removal of surface vegetation resulting from a wildfire reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris. If hydrophobic conditions were to exist post-fire, then the rate of surface water runoff would be increased as percolation of water into the soil profile is reduced (DeGomez 2011).

Downslope or downstream flooding, mudflows, and landslides are common in areas where steep hillsides and embankments are present, and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. However, as presented in Section 3.6, Geology and Soils, the project site is relatively flat to gently sloping and is not adjacent to steep slopes or steep hillsides. Given the flat characteristics of the project site and the proposed improvements, post-fire conditions would not be expected to increase risks associated with

slope failures, mudflows, or landslides. In addition, as described in Chapter 2, Project Description, and analyzed in Section 3.9, Hydrology and Water Quality, the proposed project would conform to design requirements associated with proper site preparation and grading practices and would implement surface drainage improvements and erosion control measures and construction best management practices (BMPs). During construction, BMPs would be implemented throughout work areas in quantities and design as necessitated by grade and conditions. Areas of nonnative vegetation and unvegetated areas within the construction footprint would receive erosion control BMPs. Construction BMPs (e.g., fiber rolls, gravel bags) would be used on and around the grading operations as specified in the stormwater pollution prevention plan to stabilize graded slopes. In addition, the proposed project does not propose development in areas adjacent to existing structures or people. The proposed development would not occur below slopes that are not stabilized or manufactured; therefore, the risk of a landslide would be low.

Although the project does not propose to substantially alter the existing drainage patterns of the site or project site, including through the alteration of the course of a stream or river in a manner that would result in substantial erosion or siltation; it does propose to alter the floodplain and floodway limits as part of a Conditional Letter of Map Revision/Letter of Map Revision application. This is proposed due to the fact that the project site is designated as FEMA Zone AE, and as such, the building pads must be raised a minimum of 1 foot above the base flood elevation provided in the San Diego River Flood Study and as required by the City Flood Damage Prevention Ordinance (Appendix L, *Flood Study for Carlton Oaks*). Proposed storm drains for the project would be designed to convey 100-year storm-event runoff. Increases in water-surface elevation during a 100-year storm would be contained within the channel and would not result in adverse impacts on adjacent structures within the project site, nor immediately upstream and downstream of the project. Therefore, the potential for downslope or downstream flooding as a result of drainage changes would be less than significant.

Increases in surface runoff and erosion are also possible in a post-fire environment, where surface vegetation has been removed and steep slopes can increase runoff flow velocity. As presented in Section 3.9, Hydrology and Water Quality, the proposed project would manage increases in peak flows for storm events through the use of LID features and erosion control BMPs designed to retain stormwater runoff generated on the project site. Within the golf course portion of the site, the existing drainage patterns and facilities would be updated to improve the flow of drainage, and the existing 42-inch storm drain would be rerouted through a separate public-bypass drain and would discharge directly to San Diego River. The proposed project would maintain the existing outfall structures in the post-construction condition, thereby precluding any changes to the existing storm drain system that would result in substantial erosion or siltation on or off site. Finally, the irrigated and maintained golf course would greatly reduce the risk of wildfire.

Considering these project site features and characteristics, post-fire conditions would not be expected to increase risks associated with runoff and erosion. Therefore, the proposed project would not result in significant new risks due to post-fire downstream flooding, landslides, slope instability, or drainage changes, and impacts would be less than significant.

Impact Determination

The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 5: Would the proposed project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact Discussion

Although more people would be added by the project, the development of the proposed project would not be expected to materially increase the risk of vegetation ignitions and wildfires or to increase the risk of exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

The proposed project would implement the FPP (Appendix R1) that has been prepared to provide fire planning guidance and requirements for reducing fire risk and demand for fire protection services. Although the development of the proposed project would increase the square footage of the resort building and provide additional residential homes, which in turn would increase the number of employees, residents, and visitors in the area, the project has been designed with fire protection as a key objective. All buildings within the proposed new development would be constructed in accordance with current building and fire/life/safety ordinance and codes, including all applicable code requirements related to access, water mains, fire flows, and hydrants.

The FPP (Appendix R1) includes fire protection features (refer to PDF-11, Fire Protection Measures, in Chapter 2, Project Description) that would protect the project site, its structures, and their occupants from wildfires. Chapter 7-A of the California Building Code and the City of Santee Municipal Code focuses on structure ignition resistance from flame impingement and flying embers. Construction would include enhanced ignition-resistant construction features, the installation of automatic interior residential fire-sprinkler systems (conforming to NFPA 13-D requirements), appropriate fire flow and water capacity, roads, and supporting infrastructure.

The proposed project's circulation system would consist of private roads that are built to the requirements of the CFC and City of Santee Municipal Code and maintained by the project's HOA. The project would also provide two emergency access roads, one through the existing Vista del Verde Condominiums in the northeastern corner of the project site, and the other off West Hills Parkway in the northwestern corner of the project site.

The proposed project also would involve the construction of off-site improvements, including the widening of West Hills Parkway from Carlton Oaks Drive southerly to the northerly end of the bridge on West Hills Parkway and the extension of Fanita Parkway.

As discussed in Section 3.14, Public Services, fire protection and emergency response would be provided by SFD (i.e., residential, hotel and cottages, clubhouse, and pro shop) and SDFD (i.e., modifications to golf course and West Hills Parkway). SFD Fire Station 5, 0.5 miles east of the Carlton Oaks Drive entry, would be the primary responder for the portions of the project site that fall within the City of Santee's jurisdiction. Station 4, 2.7 miles east of the Carlton Oaks Drive entry, would also provide fire protection services to the residential, hotel, clubhouse, and pro shop components of the proposed project. SDFD would provide fire protection services for the portion of the project site that falls within the City of San Diego's jurisdiction (i.e., the golf course). SDFD's Fire Station 34 is the primary

responding unit for the project site and has one engine and one brush engine. An Automatic Aid agreement, effective December 3, 1984, allows SFD and SDFD to provide services within each other's jurisdictional limits (Appendix N, *Public Services Will Serve Letters*). Based on the SFD service letter, SFD had an average response time of 5 minutes and 54 seconds in 2020, meeting the City of Santee's response-time standards from the existing fire stations.

There are currently no significance standards for evacuation travel time for the City of Santee or under CEQA. Public safety, not time, is generally the guiding consideration for evaluating impacts related to emergency evacuation. Based on the evacuation simulations performed for the proposed project (Appendix R2, *Wildfire Evacuation Study*), evacuation traffic generated by the project would not significantly increase the average evacuation travel time nor result in unsafe evacuation timeframes. In a likely evacuation scenario, existing residents on the northern area of the City of Santee that are immediately adjacent to native fuels and the most compromised residents in a wildfire scenario would be able to evacuate via Cuyamaca Street to the center of the City of Santee and would not be disrupted by evacuation from the proposed project's traffic. Evacuation flow would be able to be effectively managed.

Appendix R2, *Wildfire Evacuation Study*, includes an evacuation time discussion that is based upon an analysis performed by the traffic engineer (Appendix O2, *Santee Roadway Operations Memo*). The full details of the analysis are included as part of Appendix R2, *Wildfire Evacuation Study*, but the simulation area used for the modeling includes the existing land uses and roadway network bounded by West Hills Parkway to the west, Mast Boulevard to the north, Cuyamaca Street to the east, and Mission Gorge to the south. The same intersections analyzed in the *Carlton Oaks Country Club and Resort Draft Local Transportation Analysis* (Intersecting Metrics 2022) were included in this model, as well as Cuyamaca Street to simulate the vehicles traveling to the Santee Town Center. The residential neighborhoods included in the evacuation analysis are neighborhoods adjacent to the project site and in close proximity to native fuels, which are most likely to be compromised during a wildfire. These neighborhoods include the residential units immediately north of the project site, the units north of Mast Boulevard and west of Fanita Parkway, and the units in the northwestern area of the City of Santee, north of El Nopal.

The base intersection volumes were developed using existing traffic counts collected between 2017 and 2018 and validated against 2021 vehicle counts, as well as the number of households in the evacuating areas, multiplied by the average number of vehicles owned in that area to represent evacuating vehicles. Consistent with standard evacuation modeling procedures, a purposely-conservative estimate was used for the analysis to represent the worst-case mass evacuation scenario during late night conditions. Accordingly, it is assumed all Project occupants and residents within the study area would be home. . For this analysis, late night conditions are represented by reducing the PM peak hour volumes, which includes traffic associated with all land uses (e.g., commercial, industrial, etc.), by 90%.

As shown in Table 3.18-1, it is anticipated to take the proposed project and adjacent residential neighborhoods 91.7 minutes and 63.2 minutes to evacuate to the two safe zones, Mission Gorge Road/SR-125 Interchange and Santee Town Square, respectively. Collectively, it is anticipated to take approximately 89.2 minutes for the proposed project and adjacent residential neighborhoods to evacuate the evacuation area. The increase in travel time with the addition of the project is shown in the column identified as the delta.

Table 3.18-1. Evacuation Travel Time

Safe Zone	Total Evacuation Traffic		Evacuation Travel Time		
	Existing Land Uses	Existing Land Uses w/ Project	Existing Land Uses	Existing Land uses w/ Project	Delta
Mission Gorge Road / SR-125 Interchange	9,245	9,533	85.4 mins (1 hr and 25 mins)	91.7 mins (1 hr and 31 mins)	6.3 mins
Santee Town Center	3,407	3,695	55.5 mins	63.2 mins (1 hr and 3 mins)	7.7 mins
Study Area Total	12,652	13,228	84.5 mins (1 hr and 24 mins)	89.2 mins (1 hr and 29 mins)	4.7 mins

As shown in Table 3.18-1, under an existing condition mass evacuation of the evacuation area, the maximum time for evacuation of populations to the Mission Gorge Road/SR-125 Interchange would be approximately 1 hour and 25 minutes. With the addition of project traffic the maximum time for evacuation would increase to approximately 1 hour and 31 minutes, which is a total increase of approximately 6.3 minutes. Whereas, under the same mass evacuation scenario, the maximum time for evacuation of existing condition populations to the Santee Town Center would be approximately 55.5 minutes. With the addition of project traffic, the maximum time for evacuation would increase to approximately 1 hour and 3 minutes, which is a total increase of approximately 7.7 minutes. It is anticipated to take the proposed project and adjacent residential neighborhoods up to 91.7 minutes and 63.2 minutes to evacuate to the two safe zones, Mission Gorge Road/SR-125 Interchange and Santee Town Square, respectively. The Study Area Total evacuation time is also the mass-evacuation scenario and is the weighted average of the two safe zones, Mission Gorge Road/SR-125 Interchange and the Santee Town Square. The weighted average is calculated to consolidate the two evacuation times to provide an overall evacuation estimate for the study area. This allows for a clear comparison of without and with project conditions for the study area. The individual evacuation times to each safe zone are also disclosed to provide the magnitude of change of the evacuation travel time estimates that would be associated with the implementation of the proposed project. Therefore, the study area's total evacuation time is slightly lower than the Mission Gorge Road/SR-125 Interchange time as it accounts for the lower travel time to the Santee Town Center.

In addition to reviewing the evacuation travel time, the total intersections delay for the study area was evaluated to see the impact off the Projects traffic at the intersections. Table 3.18-2 displays the total intersections for the two scenarios. Detailed evacuation intersection delay information is provided in Appendix D of Appendix R2, *Wildfire Evacuation Study*.

Table 3.18-2. Evacuation Intersection Delay - Total Study Area

Existing Land Uses	Existing Land Uses w/ Project	Delta
469.9 seconds	489.7 seconds	19.8 seconds

Source: Appendix R2.

There are currently no significance standards for evacuation travel time for the City of Santee or CEQA. Public safety, not time, is generally the guiding consideration for evaluating impacts related to emergency evacuation. The City considers a Project's impact on evacuation significant if the Project will significantly impair or physically interfere

with implementation of an adopted emergency response or evacuation plan; or if the Project will expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

The City of Santee has historically had an extremely high success rate for safely evacuating large numbers of people and doing so in a managed and strategic way using available technological innovations. Safely undertaking large-scale evacuations may take several hours or more and require moving people long distances to designated areas. Further, evacuations are fluid, and timeframes may vary widely depending on numerous factors, including, among other things, the number of vehicles evacuating, the road capacity to accommodate those vehicles, residents' awareness and preparedness, evacuation messaging and direction, and on-site law enforcement control.

Notwithstanding evacuation challenges and variables, the success rate in the City of Santee in safely managing both mass and targeted evacuations is nearly 100% safe evacuations, based on research showing that there were no fire-caused deaths during an evacuation (Appendix R2, *Wildfire Evacuation Study*). Technological advancements and improved evacuation strategies learned from prior wildfire evacuation events have resulted in a system that is many times more capable of managing evacuations. With the technology in use today in the City of Santee, evacuations are more strategic and surgical than in the past, evacuating smaller areas at highest risk and phasing evacuation traffic so that it flows more evenly and minimizes the surges that may slow an evacuation. Mass evacuation scenarios, where large populations are all directed to leave simultaneously, resulting in traffic delays, are thereby avoided, and those populations most at-risk populations are able to safely evacuate (Appendix R2, *Wildfire Evacuation Study*).

Based on the evacuation simulations provided above and in more detail in Appendix R2, evacuation traffic generated by the project would not significantly increase the average evacuation travel time or result in unsafe evacuation timeframes. In a likely evacuation scenario, existing residents in the northern area of the City of Santee that are immediately adjacent to native fuels and the most compromised residents in a wildfire scenario would be able to evacuate via Cuyamaca Street to the center of City and would not be disrupted by evacuation from the proposed project's traffic. Evacuation flow would be able to be effectively managed.

Furthermore, the FPP (Appendix R1) analyzed the wildfire risk associated with adding new residents to the project site. Research indicates that, in San Diego County, equipment-caused fires are by far the most numerous and also accounted for most of the area burned, followed closely by the area burned by power line fires (Syphard and Keeley 2015). The type of dense, master-planned developments, like proposed project, are not associated with increased vegetation ignitions. The project would result in a conversion of ignitable fuels to lower flammability landscape, managed and maintained landscapes, and generally a reduction in the receptiveness of the area's landscape to ignition. This would result in a project that is less susceptible to wildfire than surrounding landscapes and that would facilitate firefighter and medical aid response, as well as project resident evacuation in a wildfire emergency (Appendix R1, *Fire Prevention Plan*).

Moreover, following build-out, irrigated and thinned landscape vegetation associated with FMZs would be located in the immediate area surrounding the Development Footprint, extending 100 horizontal feet from structures. Typical FMZs are 100 feet wide, consistent with requirements. Native and naturalized vegetation occurring within FMZ Zone 2 is not expected to be irrigated, although overall fuel volumes would be reduced by removing dead and dying plants, nonnatives, and highly flammable species and thinning the remaining plants so they would not readily facilitate the spread of fire. Furthermore, the FMZ areas would be maintained on an ongoing basis by the HOA. In summation, the post-development vegetation composition proximate to the project footprint is expected to be significantly different than current conditions.

Based on fire behavior modeling, the FPP determined that wildfires may occur, but would not be significantly increased in frequency, duration, or size with the construction of the project. One reason for this is that within an area that is adjacent to the VHFHSZ, the project would create a large, lower-risk area, which would help reduce the fire threat within the vicinity of the project site. In addition, various project features, including multiple new access routes, would result in a site that is less susceptible to wildfire than surrounding landscapes and that would facilitate firefighter and medical aid response, as well as project resident evacuation in a wildfire emergency. The project would provide a highly defensible community and contingency planning if evacuation from the site were considered unsafe. This approach is consistent with San Diego County's evacuation approach, which states, "The concept of shelter-in-place is an available option in those instances where physical evacuation is impractical. This procedure may be effective for residential dwellings in the immediately impacted areas, or for large facilities that house a high percentage of non-ambulatory persons (i.e., hospitals and convalescent homes). Sheltering-in-place attempts to provide a haven within the impacted area" (County of San Diego 2022). Although not a designated shelter-in-place community, the structures at Carlton Oaks would include the same level of ignition resistance and landscape maintenance, are defensible against the short duration wildfire exposure anticipated, and are designed to require minimal resources for protection, which enables these contingency options that may not be available to other vicinity communities.

This development would function as a fuel-reduction project by helping create context-sensitive development. The parts of the project site proposed for development would either convert the existing vegetation to a lower flammability, more ignition-resistant landscape than under current conditions or replace existing golf course landscaping with more fire-resistant landscape material. The structures in the proposed project would be built to ignition-resistant standards per the California Fire and Building Codes and the City of Santee Municipal Code in effect at the time of building permit issuance.

Adherence to current building codes and standards, which require 100 feet of fuel modification and defensible space to be provided around all structures, would ultimately reduce the potential flammability of the landscape.

Based on the analysis provided above, and the detailed analyses provided in Appendix R1 and R2, the project would not expose people or structures to a significant risk of loss, injury, or death from wildland fires.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

3.18.6 Cumulative Impacts and Mitigation Measures

Cumulative Threshold 1: Would implementation of the proposed project contribute to a significant cumulative impact related to impairment of an adopted emergency response plan or emergency evacuation plan?

The geographic context for the cumulative impact analysis regarding impairing an emergency response or evacuation plan is the areas of the City of San Diego and City of Santee surrounding the project site, where these plans would apply. Cumulative impacts from multiple projects within the SFD's jurisdiction can cause fire response service declines and impede emergency evacuation plans. All of the cumulative projects presented in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, are projects within SFD's jurisdiction and could have the potential to result in impacts on emergency response and evacuation plans. Development of the proposed project, in combination with these cumulative projects, would result in a potentially significant cumulative impact if they were not consistent with the *San Diego County Emergency Operations Plan* (County of San Diego 2022).

As discussed above, an FPP and Wildfire Evacuation Plan were prepared for the proposed project to ensure that the project would be built to withstand significant fire, provide residents with at least two evacuation routes, and offer the contingency option to emergency planners and responders of temporarily refuging persons on site if that approach is considered safer than evacuating (Appendices R1 and R2). The proposed project's Wildfire Evacuation Plan was developed based on guidance from the County of San Diego's *Emergency Operations Plan*. Details of the emergency access routes are described in the *Wildfire Evacuation Plan* (Appendix R2) prepared for the proposed project.

Although mass evacuation events have become less common because wildfire evacuation technology and capabilities have improved dramatically in the last 15 years, these events can still serve as conservative scenarios under which to analyze evacuation impacts. However, current evacuation practice typically targets the scope of the evacuation only to the area in immediate danger. Specifically, the City of Santee and County of San Diego utilize the Genasys Evacuation system to provide precise evacuation information. Targeting the area in immediate danger allows for better evacuation operations, reduces gridlock, and reserves sufficient travel way for emergency vehicles. Under this approach, first responders or law enforcement personnel would direct traffic at critical intersections during the evacuation process. When the Incident Commander deems certain areas at risk due to fire conditions, an evacuation order is issued. Based on the San Diego County Operational Area Evacuation and Repopulation procedure, an evacuation order requires the movement of community members out of a defined area due to an immediate threat to life and property from an emergency incident. An evacuation order should be used when there is a potential for or an actual threat to civilian life, within 1 hour to 2 hours of such determination, or when the Incident Commander deems it necessary to protect civilians. The purpose of an evacuation warning, in comparison, is to alert community members in a defined area of a potential threat to life and property from an emergency incident. An evacuation warning may be issued when the potential or actual threat to civilian life is more than 2 hours away.

As demonstrated in the Border Fire #32, the Thomas Fire, and other recent fires, evacuation orders were issued only to those populations facing a potential or imminent threat. In some cases, such as the Thomas Fire, law enforcement emphasized that the evacuation order was specific to certain areas to prevent a mass evacuation that could congest the roadway network and hinder their ability to prioritize those at the greatest risk. The project would be built to ignition-resistant standards and represent fire-safe fuel breaks that provide emergency managers many options that do not all include a mass evacuation. Under this evacuation approach, the evacuation would include a

much smaller population. The evacuation time would be even lower and would have little impact on the existing communities (Appendix R2, *Wildfire Evacuation Study*).

The project would add new dwelling units and residents, which would result in an increase in potential service demand of approximately 44 calls per year. This increase is within the capacity of the existing SFD fire stations that would service the project. As noted in the FPP (Appendix R1) the potential impact of multiple projects, when considered cumulatively, would be mitigated by increased funding available from each project to the SFD through property taxes and other fees associated with each project, including the proposed project. This funding would be utilized to maintain or enhance fire response capabilities. Additionally, it is anticipated that future development projects would undergo CEQA review of potential impacts on adopted emergency response or evacuation plans and would be required to mitigate potential impacts. As a result, cumulative impacts related to interference with adopted emergency response or evacuations plans would be less than significant. Project impacts would be less than significant and would not contribute to a cumulatively significant impact.

Cumulative Threshold 2: Would implementation of the proposed project contribute to a significant cumulative impact related to exacerbating wildfire risks of, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The geographic context for the analysis of cumulative impacts in regard to exacerbating wildfire risks and exposing project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire is the project site and immediately surrounding area, where the effects of potential pollutant exposure could occur. Cumulative impacts from multiple projects or large projects within the immediate area could exacerbate wildfire risk and thereby expose occupants to harmful pollutants. Several cumulative projects presented in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, are immediately adjacent to the project site and would have the potential to result in impacts on occupants from exposure to pollutant concentrations from a wildfire as a result of exacerbated fire risk. These projects include the Rancho Fanita Villas, Prospect Estates II Subdivision, Tyler Street Subdivision, Shell Gas Station, Woodspring Suites Hotel, Prospect Avenue Subdivision, Laurel Heights Condominiums, Ukrainian Catholic Church, Carlton Hills Private School, and South Slope Street Subdivision. Of these projects, only the Tyler Street Subdivision, Prospect Avenue Subdivision, Laurel Heights Condominiums, and South Slope Street Subdivision are located in a VHFHSZ. Similar to the proposed project, these cumulative projects would be required to comply with the latest ignition-resistant building codes found in CBC Chapter 7A, as adopted by the City of Santee, and any additional restrictions or requirements adopted locally by the SFD. Therefore, cumulative projects would be constructed and designed to minimize wildfire risk and would not significantly exacerbate wildfire risk, resulting in the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire.

As discussed in the FPP (Appendix R1), the project would include fire protection features to protect the project site, its structures, and their occupants from wildfires. Research indicates that the type of dense, master-planned developments, like the proposed project, are not associated with increased vegetation ignitions. Additionally, the project site is generally flat and does not include topography that would create unusual weather conditions. As a result, the proposed project would not exacerbate wildfire risk resulting in the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire. A significant cumulative impact would not occur, and the proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 3: Would implementation of the proposed project contribute to a significant cumulative impact related to the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?

The geographic context for the analysis of cumulative impacts from the project requiring the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment is the project site and the immediately surrounding area. Cumulative impacts from multiple projects or large projects within the immediate area could exacerbate wildfire risk and expose occupants to environmental impacts from the infrastructure required to serve these projects. Several cumulative projects presented in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, are projects located immediately adjacent to the project site that would have the potential to result in impacts from installation or maintenance of infrastructure that may exacerbate fire risk. These projects include the Rancho Fanita Villas, Prospect Estates II Subdivision, Tyler Street Subdivision, Shell Gas Station, Woodspring Suites Hotel, Prospect Avenue Subdivision, Laurel Heights Condominiums, Ukrainian Catholic Church, Carlton Hills Private School, and South Slope Street Subdivision. Of these projects, only the Tyler Street Subdivision, Prospect Avenue Subdivision, Laurel Heights Condominiums, and South Slope Street Subdivision are located in a VHFHSZ. Due to their proximity, an impact could occur if all of these projects were to install infrastructure that would exacerbate fire risk. New infrastructure associated with the proposed project and other cumulative projects would be required to comply with the CBC, CFC, and the City of Santee Municipal Code in effect at the time of building permit issuance. These regulations require projects to construct ignition-resistant structures and provide FMZs, fire apparatus access, water availability, and other requirements. A full list of project fire safety features is included in the FPP (Appendix R1). Therefore, cumulative projects, including the proposed project, would not result in a significant cumulative impact associated with exacerbated fire risk from the installation or maintenance of infrastructure. The proposed project's contribution would not be cumulatively considerable.

Cumulative Threshold 4: Would the proposed project contribute to a significant cumulative impact related to exposing 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 geographic context for the analysis of cumulative impacts that would 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, is the project site and the immediate surrounding area. Several cumulative projects in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, are projects in the areas immediately surrounding the project site. These projects include the Rancho Fanita Villas, Prospect Estates II Subdivision, Tyler Street Subdivision, Shell Gas Station, Woodspring Suites Hotel, Prospect Avenue Subdivision, Laurel Heights Condominiums, Ukrainian Catholic Church, Carlton Hills Private School, and South Slope Street Subdivision. Of these projects, only the Tyler Street Subdivision, Prospect Avenue Subdivision, Laurel Heights Condominiums, and South Slope Street Subdivision are located in a VHFHSZ. Due to their proximity, a cumulative impact could occur if post-fire conditions, such as hillside instability on the project site or surrounding areas, were to expose people or structures to significant risks, including landslides or flooding. Construction of projects considered in the cumulative analysis would involve grading and other earthmoving activities that could result in temporary and short-term localized soil erosion or landslides. However, these site-specific impacts would not be expected to combine with the effects of other surrounding project activities because cumulative projects would be required to comply with existing regulations, including adherence to stormwater-management requirements, and associated BMPs. These required measures would control erosion and construction-related contaminants at each construction site. Once complete,

the irrigated and maintained landscaping in the proposed project would be ignition-resistant and would not be expected to be burned or removed entirely should a fire occur on the project site. The proposed project would not substantially exacerbate wildfire risks or hazards and could reduce the risk of project site fires by converting existing undeveloped vacant spaces containing ignitable fuels to maintained landscapes and replacing older buildings with new buildings constructed to current codes. Considering these project site features and characteristics, in combination with adherence to existing regulations, compliance with stormwater-management requirements, and associated BMPs, post-fire conditions on the project site would not be expected to combine with other cumulative projects and increase risks associated with runoff and erosion. Therefore, the proposed project's impacts related to flooding or landslides as a result of fire would not be cumulatively considerable.

Cumulative Threshold 5: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, including in areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

As discussed in Threshold 5, above, the structures in the proposed project would be built to ignition-resistant standards per the California Fire and Building Codes and the City of Santee Municipal Code in effect at the time of building permit issuance. Adherence to current building codes and standards, which require 100 feet of fuel modification and defensible space to be provided around all structures, would ultimately reduce the potential flammability of the landscape.

Additionally, the FPP (Appendix R1) includes fire protection features (incorporated into the project as PDF-11, Fire Protection Measures) that would protect the project site, its structures, and their occupants from wildfires. These features are detailed above but include features such as an FMZ around the perimeter of the project, ignition-resistant landscaping and structures, interior fire sprinklers, and fire access roads.

The FPP (Appendix R1) also concludes that although more people would be added by the project, the development of the proposed project would not be expected to materially increase the risk of vegetation ignitions and wildfires and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, because of the factors listed herein. Similarly, it is anticipated that future development projects within or adjacent to VHFHSZs or WUI would undergo CEQA review of potential impacts relative to the risk of loss, injury, or death involving wildland fires and would be required to implement measures necessary to mitigate potential impacts.

As discussed in Threshold 1 and Cumulative Threshold 1, above, cumulative impacts from multiple projects within the SFD's jurisdiction can cause fire response service declines and impede emergency evacuation plans. All of the cumulative projects presented in Table 3-2, Cumulative Projects, in Chapter 3, Environmental Analysis, are projects within SFD's jurisdiction and could have the potential to result in impacts on emergency response and evacuation plans. Development of the proposed project, in combination with these cumulative projects, would result in a potentially significant cumulative impact if they were not consistent with the San Diego County Emergency Operations Plan (County of San Diego 2022). It is anticipated that future development projects would undergo CEQA review of potential impacts on adopted emergency response or evacuation plans and would be required to mitigate potential impacts in accordance with the San Diego County Emergency Operations Plan (County of San Diego 2022). As a result, cumulative impacts related to interference with adopted emergency response or evacuations plans are anticipated to be less than significant as identified in the Cumulative Threshold 1, above.

Additionally, the project would provide two emergency access roads, one through the existing Vista del Verde Condominiums in the northeast corner of the project site, and the other off West Hills Parkway in the northwestern corner of the project site. The proposed project also would involve the construction of off-site improvements,

including the widening of West Hills Parkway from Carlton Oaks Drive southerly to the northerly end of the bridge on West Hills Parkway and the extension of Fanita Parkway. Although additional dwelling units and more people would be added by the project, various project features, including multiple new access routes, would result in a site that is less susceptible to wildfire than surrounding landscapes and that would facilitate firefighter and medical aid response, as well as resident evacuation in a wildfire emergency.

Based on the evacuation simulations provided above and in more detail in Appendix R2, evacuation traffic generated by the project would not significantly increase the average evacuation travel time or result in unsafe evacuation timeframes. In a likely evacuation scenario, existing residents in the northern area of the City of Santee that are immediately adjacent to native fuels and the most compromised residents in a wildfire scenario would be able to evacuate via Cuyamaca Street to the center of City and would not be disrupted by evacuation from the proposed project's traffic. Evacuation flow would be able to be effectively managed.

The project would provide a highly defensible community and contingency planning if evacuation from the site were considered unsafe. This approach is consistent with San Diego County's evacuation approach which states, "The concept of shelter-in-place is an available option in those instances where physical evacuation is impractical. This procedure may be effective for residential dwellings in the immediately impacted areas, or for large facilities that house a high percentage of non-ambulatory persons (i.e., hospitals and convalescent homes). Sheltering-in-place attempts to provide a haven within the impacted area" (County of San Diego 2022). Although not a designated shelter-in-place community, the structures at Carlton Oaks would include the same level of ignition resistance and landscape maintenance, are defensible against the short duration wildfire exposure anticipated, and are designed to require minimal resources for protection, which enables these contingency options that may not be available to other vicinity communities.

As a result, cumulative impacts related to exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires would be less than significant. Therefore, the proposed project's contribution would not be cumulatively considerable.

3.18.7 Summary of Significant Impacts

There would be no significant impacts associated with wildfire.

3.18.8 References

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4 Other CEQA Considerations

4.1 Introduction

This chapter addresses the potential for additional consequences related to the implementation of the proposed Carlton Oaks Country Club and Resort Project (project), pursuant to California Environmental Quality Act (CEQA) Guidelines Sections 15126.2(c), 15126(d),¹ and 15128. Specifically, this chapter (1) discusses the environmental effects of the project that were determined not to be significant during the initial environmental review process; (2) addresses significant irreversible changes to the environment that would result from implementation of the proposed project; and (3) discusses growth-inducing impacts of the proposed project, which pertain to ways in which the proposed project could promote either direct or indirect growth.

4.2 Effects Found Not to Be Significant

State CEQA Guidelines Section 15128 requires that an Environmental Impact Report (EIR) contain a brief statement disclosing the reasons why various possible significant effects of a proposed project were found not to be significant and, therefore, would not be discussed in detail in the EIR. Implementation of the proposed project does not have the potential to result in significant impacts related to the following checklist items, and therefore, further analysis in the EIR is not needed.

4.2.1 Agriculture and Forestry Resources

Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The proposed project site is currently used as a golf course and is located within an urbanized area that does not support any agricultural uses. According to the California Department of Conservation's San Diego County Important Farmland Mapper (California Department of Conservation 2022), the proposed project site is classified as Urban and Built-Up Land, which does not contain any agricultural uses or areas designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would not convert farmland to nonagricultural uses, and there would be no impact.

Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The proposed project is zoned for Park/Open Space and Planned Development. Some agricultural uses are allowed in the Park/Open Space zone. The zoning districts would not change with implementation of the proposed project. There are no Williamson Act contracts or forest lands in the project vicinity (California Department of Conservation 2024). Therefore, there would be no impact.

¹ The requirements of State CEQA Guidelines Sections 15126.2(a), 15126.2(b), and 15126.2(c) are met in Chapter 3, Environmental Analysis, under each resource discussion.

Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

The project site is an existing golf course and does not support any forestry uses. *California's Forests and Rangelands: 2010 Assessment* (2010 Assessment), completed as part of the California Department of Forestry and Fire Protection (CAL FIRE) Fire Resource Assessment Program (FRAP), provides an assessment of the state's inventory of forest land and identifies lands within the project site as Urban (CAL FIRE 2010). The 2010 Assessment does not identify forest land, rangeland, timberland, or Timberland Production Zones within the project site. Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or Timberland Production Zone areas and would not result in the loss of forest land or the conversion of forest land to non-forest use. There would be no impact on forestry resources.

Would the project result in the loss of forest land or conversion of forest land to non-forest use?

There is no forest land on the project site, and the proposed project would be located within the bounds of the existing disturbed areas. Thus, the proposed project would not convert forest land to non-forest uses, and there would be no impact.

Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The proposed project would develop residential neighborhoods, which would be consistent with the land uses surrounding the project site, and would redevelop the existing golf course resort and include similar uses and amenities. The proposed project would not result in any other changes, or indirect effects, that would convert agricultural or forest land to nonagricultural and non-forest uses. Therefore, there would be no impact.

4.2.2 Mineral Resources

Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

There are no existing mineral extraction sites on the project site; thus, implementation of the proposed project would not result directly in the loss of a known mineral extraction site. The proposed project would not change the zoning or introduce new uses to the project site that would preclude the future extraction of mineral resources in the zoning districts that currently allow mineral extraction. Therefore, the proposed project would not result in the loss of known mineral extraction sites, and there would be no impact.

4.3 Significant Irreversible Environmental Changes

State CEQA Guidelines Section 15126 requires that EIRs evaluate all phases of a project and their impact on the environment. CEQA also requires decision-makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. This section addresses the use of nonrenewable resources and irreversible impacts associated with the construction of the proposed project.

The project proposes the following components:

- Demolition of the existing Carlton Oaks Golf Course clubhouse, restaurant/bar, pro shop, hotel and hotel cottages, and surface parking lots
- Redevelopment of the golf course and construction of a pro shop, tournament hall, learning center and cart barn
- Construction of new residential accessory uses consisting of two residential neighborhoods with open space areas
- Construction of a resort facility consisting of a hotel, hotel cottages, clubhouse, and surface parking lot
- Construction of a graded bench area to connect to the San Diego Association of Governments' (SANDAG) future San Diego River Trail
- Construction of off-site utility and access improvements

The project includes demolition of some existing uses, including concrete and asphalt parking lots and roadways and hardscape. Demolition of the hardscape would be considered an irreversible change. Construction of the proposed project would require a permanent commitment of nonrenewable natural resources, primarily from the direct consumption of fossil fuels. These fossil fuels would be consumed during both construction and operation in the form of diesel and gasoline used in construction equipment, commuter vehicles, and trucks. Electricity would also be consumed during construction and operation from power tools, electric equipment, and lighting, although not all electricity used would be from nonrenewable sources. The portion of electricity generated from fossil fuels, such as natural gas, however, would be irretrievable and irreversible. The materials that would be used during construction and operational activities would be unavailable for other uses. As discussed in Chapter 3, Environmental Analysis, and throughout the cumulative impact analysis within each resource area section, implementation of the proposed project would result in significant irreversible environmental changes and cumulatively considerable impacts related to transportation. These results are summarized below.

4.4 Significant Unavoidable Impacts

All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation, including, but not limited to, significant environmental effects that cannot be avoided if the proposed project is implemented. The following impact would be significant and unavoidable:

As discussed in Section 3.16, Transportation, Circulation, and Parking, the proposed project's residential uses and commercial uses would generate vehicle miles traveled (VMT) above the City of Santee's significance threshold. Therefore, residential and commercial uses associated with the proposed project would have significant VMT impacts. The proposed project would be located directly adjacent to a Regional Mobility Hub and would implement **MM-TRA-1**, which includes transportation demand management measures to reduce VMT. However, despite implementation of these measures, the residential and commercial VMT generated by the proposed project would not be reduced below the applicable threshold. Therefore, the proposed project would have significant and unavoidable transportation-related impacts.

4.5 Growth-Inducing Impacts

State CEQA Guidelines Section 15126.2(e) requires that an EIR discuss the ways in which a proposed project could directly or indirectly foster economic development, population growth, or additional housing and how that growth would affect the surrounding environment. Direct growth inducement would result if a project, for example, involved

construction of new housing. Indirect growth might occur if a project were to establish substantial new permanent employment opportunities that would stimulate the need for additional housing, utilities, and public services.

Similarly, a project would indirectly induce growth if it would remove an obstacle to additional development, such as removing a constraint on a required public service or utility. A project proposing to expand water supply capabilities in an area where limited water supply has historically restrained growth would be considered growth inducing.

This section discusses the characteristics and consequences of the proposed project that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. However, the following analysis does not assume that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment (State CEQA Guidelines Section 15126.2[e]). Rather, Chapter 3, Environmental Analysis, and the cumulative impact analyses discussed in each resource section examine the adverse impacts on resources, including any impacts that would be caused by cumulative conditions.

4.5.1 Foster Economic Growth

One criterion by which growth inducement can be measured involves economic growth. Economic-growth considerations range from a demand for temporary and permanent employees, to an increase in the overall revenue base for an area, to a new demand for supporting services, such as retail, restaurant, and entertainment uses.

The proposed project would foster growth through three primary means: (1) the creation of new jobs; (2) an increase in business and tax revenues; and (3) an increase in the demand for supporting services.

4.5.1.1 Economic Growth Through New Jobs

In the short term, the proposed project would induce economic growth by introducing temporary employment opportunities associated with construction of the project. In addition to the direct short-term employment, these workers would likely patronize businesses in the project area and in the City of Santee and larger San Diego region, resulting in indirect economic benefits, as well.

In the long term, operation of the project would induce economic growth by attracting new residents and creating long-term employment opportunities. The proposed project would result in permanent employment in hospitality, retail, and other commercial businesses. However, as noted below in Section 4.4.2, Foster Population Growth, the increase in permanent employment opportunities is anticipated to be nominal compared to current employment opportunities at the existing clubhouse and hotel. The number of jobs in the City of Santee is projected to be 25,997 by 2050 (SANDAG 2022).

As such, the proposed project would create new employment opportunities and ultimately would contribute to economic growth of the City of Santee and the larger San Diego region.

4.5.1.2 Economic Growth Through Increased Business and Tax Revenues

Implementation of the proposed project would result in additional resort and golf club uses that would spur economic growth in the form of increased revenue and a demand for related services (e.g., restaurants and retail) in the City of Santee and greater San Diego area. As such, project implementation would result in an increase in business and local sales tax. This increase in yearly revenue could spur additional growth in other areas because it

would provide the City of Santee with additional funds on a yearly basis. Therefore, the project would stimulate additional economic growth indirectly as a result of the increase in demand for related services.

4.5.2 Foster Population Growth

The proposed project would involve the development of housing and would therefore increase the population in the City of Santee. As discussed in Section 3.13, Population and Housing, the proposed project would introduce 242 new dwelling units, which would result in an increase in population of approximately 686 people. The project would also result in the creation of temporary employment opportunities to support construction of the project. Additionally, the project would necessitate employees for operation of the redeveloped clubhouse and resort; however, this increase is anticipated to be nominal compared to current employment opportunities at the existing clubhouse and hotel. The project would be expected to require a small increase in number of catering staff, but the number of staff needed for golf course and hotel maintenance and operation would be similar to existing staffing levels. The increase in permanent employment opportunities created by the project would not increase the City of Santee's population substantially because the increase would be relatively small compared to current employment opportunities at the project site.

4.5.3 Remove Obstacles to Population Growth

A project would indirectly induce growth if it would remove a constraint on a required public service or utility. A project would also indirectly induce growth if it would establish a precedent-setting action (e.g., an innovation, a change in zoning, a General Plan amendment approval). The proposed project would require both infrastructure upgrades and a conditional use permit, which could result in the removal of obstacles to growth. However, the residential areas have a Planned Development (PD) and Low-Medium Density Residential (R2) land use and zoning and would not require a General Plan amendment or rezoning. The proposed project would not extend infrastructure, such as roadways, water, gas, or electricity, into previously undeveloped areas because the project site is an infill site within an urbanized area. Existing roadways, water, and wastewater services would continue to serve the project site and surrounding area. A public water line would be extended from an existing water main at Carlton Oaks Drive, down to West Hills Parkway, and would be continued as a private main within the project site. A private pump station and sewer system would be installed to pump sewage along the northern boundary of the proposed golf course to the existing sewer line. The clubhouse and resort also would be served by a private, 8-inch gravity sewer main, which would connect to an existing 24-inch public main that bisects the resort area. This would be done to accommodate the additional demand of residents, hotel visitors, and employees and would not be expanded into previously undeveloped areas in a manner that would allow for the construction of additional housing or other development beyond that of the proposed project. Any expansion or modification of existing infrastructure would be completed solely to serve the proposed project and would not have implications for other properties in the surrounding area. As such, the project would not remove obstacles to growth.

4.5.4 Summary of Growth-Inducing Impacts

The proposed project is expected to foster economic growth by attracting new residents, creating new temporary employment opportunities, and inducing a small increase in permanent employment opportunities; it is also expected to lead to an indirect increase in demand for related services. Overall, the project would have a modest, but measurable, effect on regional growth.

4.6 References

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5 Alternatives to the Proposed Project

5.1 Overview

This chapter describes and analyzes a range of reasonable alternatives that could feasibly attain most of the basic project objectives, while avoiding or substantially lessening one or more of the significant effects of the proposed Carlton Oaks Country Club and Resort Project (project). The primary purpose of this chapter is to ensure that the comparative analysis provides sufficient detail to foster informed decision making and public participation in the environmental process.

Four alternatives to the proposed project are analyzed in this chapter and discussed in terms of their merits relative to the project.

- Alternative 1 – No Project Alternative
- Alternative 2 – Reduced Project Alternative
- Alternative 3 – Reduced Resort Alternative
- Alternative 4 – Reduced Footprint Project Alternative

Based on the analysis below, Alternative 2, the Reduced Project Alternative, would be the environmentally superior alternative.

5.2 Requirements for Alternatives Analysis

The California Environmental Quality Act (CEQA) Guidelines require that an Environmental Impact Report (EIR) present a range of reasonable alternatives to a project, or to the location of a project, which could feasibly attain a majority of the basic project objectives, but that would avoid or substantially lessen one or more significant environmental impacts of the project. The range of alternatives required in an EIR is governed by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative to a project. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the basic project objectives, are not feasible, or do not avoid or substantially lessen any significant environmental effects (State CEQA Guidelines Section 15126.6[c]).

In addition to the requirements described above, CEQA requires the evaluation of a No Project Alternative, which analyzes the environmental effects that would occur if the project did not proceed (State CEQA Guidelines Section 15126.6[e]). Moreover, the EIR is required to identify the environmentally superior alternative. If the environmentally superior alternative is the No Project Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives (State CEQA Guidelines Section 15126.6[e][2]).

5.3 Selection of Alternatives

A lead agency may structure its EIR alternative analysis around a reasonable definition of the project’s underlying goal and need not study alternatives that cannot achieve that basic goal. The underlying goal of the project is to redevelop the existing Carlton Oaks Country Club and Resort into a mixed-use recreation-related country club resort

consistent with the vision outlined in the City of Santee's General Plan (1984) that can offer a high-quality resort setting and recreation-related amenities and uses.

The project includes the following objectives:

1. Provide a high-quality, mixed-use recreational resort that will enhance the experience of its users by integrating the country club and related amenities with the golf course and open-space areas to provide a resort-like setting for the facilities and offer views of the golf course from the facilities.
2. Develop a mixed-use, recreation-related country club resort consistently with the principles of the City of Santee General Plan (1984) that offers a high-quality resort setting and recreation-related amenities and uses that are consistent with other high-quality resorts in the region.
3. Provide a golf course with a professionally designed layout that can be utilized by a broad range of players, enhance the golfers' experiences, and meet the needs of the broader tourism market.
4. Provide a golf course that has improved drainage flows, reduced accumulation of surface water on the site, requires less water usage, and avoids environmentally sensitive areas, when feasible.
5. Provide additional economic revenue for the City of Santee and County of San Diego through the generation of sales, transient occupancy, and property taxes by expanding the event facilities, adding residential units, and upgrading the hotel units.
6. Invigorate the local economy by providing additional employment and business opportunities associated with operation of the proposed project.
7. Provide high-quality housing opportunities that help satisfy regional housing needs.
8. Locate the residential uses in a manner that will serve as a transition from the adjacent residential neighborhoods by providing comparable housing products.
9. Foster future economic sustainability of the Carlton Oaks Country Club and Resort by providing residential accessory uses that will result in a diversification of the Resort's customers and enhancement of membership opportunities, thereby stimulating year-round activity at the new facilities and site.
10. Design a development that is compatible with the San Diego River and includes links to existing and planned trails to the east and west of the project site.
11. Provide a mixed-use recreational facility that will provide similar lifestyle experiences (i.e., residential units) as other high-quality resorts in the region.

CEQA also requires alternatives to be feasible. *Feasible* is defined in CEQA as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (California Public Resources Code Section 21061.1). The State CEQA Guidelines indicate factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (State CEQA Guidelines Section 15126.6). Finally, the alternatives should also avoid or substantially lessen one or more significant environmental impact that would occur under the project. Table 5-1 summarizes the project's significant impacts, which are listed here to focus on the issue areas where one or more alternatives may reduce an identified significant impact that would occur if the project were implemented.

Table 5-1. Summary of Significant Impacts of the Proposed Project

Resource Impact	Significant and Unavoidable	Less than Significant with Mitigation
Section 3.2, Air Quality and Health Risks		
Impact AQ-1: Expose Sensitive Receptors to Substantial Pollutant Concentrations	—	X
Section 3.3, Biological Resources		
Impact BIO-1: Diegan Coastal Sage Scrub (City of San Diego)	—	X
Impact BIO-2: Permanent Impacts on Sensitive Communities (City of Santee)	—	X
Impact BIO-3: Temporary Impacts on Sensitive Communities (City of Santee)	—	X
Impact BIO-4: Wetland Impacts	—	X
Impact BIO-5: Least Bell's Vireo Breeding Habitat (City of Santee)	—	X
Impact BIO-6: Non-Listed Special-Status Species Habitat	—	X
Impact BIO-7: Nesting Birds	—	X
Impact BIO-8: Crotch's Bumble Bee	—	X
Impact BIO-9: Western Spadefoot	—	X
Impact BIO-10: Burrowing Owl	—	X
Impact BIO-11: Cormorant Rookery	—	X
Impact BIO-12: Construction Noise	—	X
Impact BIO-13: Indirect Human Activity	—	X
Impact BIO-14: Domestic Animals	—	X
Impact BIO-15: Water Quality	—	X
Impact BIO-16: Fugitive Dust	—	X
Section 3.4, Cultural and Tribal Cultural Resources		
Impact CUL-1: Potential to Affect Archaeological Resources	—	X
Impact CUL-2: Potential to Affect Unknown Human Remains	—	X
Impact TCR-1: Potential to Impact Tribal Cultural Resources	—	X
Section 3.6, Geology and Soils		
Impact GEO-1: Potential to Exacerbate Conditions That Would Result in Liquefaction	—	X
Impact GEO-2: Potential to Disturb Buried Paleontological Resources (Santee)	—	X
Section 3.9, Hydrology and Water Quality		
Impact HYD-1: Potential to Place New Development within the Regulatory Floodway and Floodplain Limits	—	X
Section 3.12, Noise and Vibration		
Impact NOI-1: Potential to Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels	—	X
No Impact: Potential to Generate Excessive Groundborne Vibration or Groundborne Noise Levels	—	X
Impact C-NOI-1: Potential to Generate a Substantial Temporary or Permanent Increase in Ambient Noise Levels	—	X

Table 5-1. Summary of Significant Impacts of the Proposed Project

Resource Impact	Significant and Unavoidable	Less than Significant with Mitigation
Section 3.15, Recreation		
Impact REC-1: Construction of Recreational Facilities that Have the Potential to Result in Significant Impacts to the Environment	—	X
Impact C-REC-1: Construction of Recreational Facilities that Have the Potential to Result in Significant Cumulative Impacts to the Environment	—	X
Section 3.16, Transportation and Circulation		
Impact TRA-1: Generate Vehicle Miles Traveled in Exceedance of Thresholds for Residential Uses	X	—
Impact TRA-2: Generate Vehicle Miles Traveled in Exceedance of Thresholds for Commercial Uses	X	—
Impact C-TRA-1: General Vehicle Miles Traveled in Exceedance of Thresholds for Residential and Commercial Uses	X	—
Section 3.17, Utilities and Service Systems		
Impact UTIL-1: Require or Result in the Relocation or Construction of New or Expanded Utilities	—	X

5.4 Alternatives Considered but Rejected from Further Study

CEQA Guidelines state that an EIR should identify any alternatives that were considered by the lead agency but were rejected and briefly explain the reasons underlying the lead agency's determination. Among factors used to eliminate alternatives from detailed consideration in the EIR is the failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental effects (CEQA Guidelines Section 15126.6[c]). This section describes alternative concepts that were considered as alternatives to the proposed project, but were rejected from further analysis, and the reason(s) underlying their rejection.

5.4.1 Alternative Location

In accordance with CEQA Guidelines Section 15126.6(f)(2), an alternative project site location should be considered if the development of another site is feasible and if the development of another site would avoid or substantially lessen the significant impacts of the proposed project. Factors that may be considered when identifying an alternative site location include the size of the site, its location, the general plan (or community plan) land use designations, and the availability of infrastructure. CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternative locations are whether the project proponents can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). The Alternate Location Alternative would include building the proposed project in a different location from the current project site.

When looking for the alternative sites, the following criteria were used:

- Alternative site had to be within the identified market area
- Land had to be privately owned
- Alternative site had to feasibly accomplish most of the basic objectives of the project

The project objectives would require that the project be sited in an area adjacent to a golf course and/or open-space area that can accommodate recreational opportunities and related amenities to establish a high-quality mixed-use recreational use for the community and the region. There is no other golf course in the City of Santee that is available. Nor is there other similarly sized, undeveloped, property known to be available for development within Santee that can be developed as a golf course or is adjacent to an existing golf course or open-space areas that could accommodate the development of such use. Therefore, the project's key objectives around developing a mixed-use recreation-related development that offers similar amenities and a lifestyle experience with high-quality country club amenities would not be met. If such a site were to become available, the development would likely require land that includes open-space areas and would, therefore, result in impacts similar to those identified for the proposed project. This would reasonably include effects such as aesthetics, biological resources, cultural resources, and noise. Therefore, an alternative location was considered, but rejected because (1) it is unlikely that an alternative site in the City of Santee would substantially reduce significant environmental effects relative to the proposed project given the size of the parcel and type of land that would be required for development; and (2) there is no such parcel available that could accommodate a high-quality mixed-use recreational project within the City of Santee that would meet the project's objectives. Therefore, the need for additional evaluation of an off-site alternative was rejected from further consideration.

5.4.2 Alternative Design

A number of potential alternative designs for the project were proposed from responses received during the Notice of Preparation.

5.4.2.1 No Residential Uses in Residential North and Residential West Alternative

One proposal suggested eliminating housing in both the Residential North and Residential West sites as a City of Santee *General Plan*-consistent alternative. If the purpose of this alternative is consistency with the City of Santee *General Plan*, then it would not meet this objective. The General Plan and zoning designation for Residential North and Residential West is Planned Development, which allows residential uses. In fact, when looking at the overall project site, housing can only be built on these two parcels. If housing were eliminated from these locations, no housing could be built as a part of the project. Without housing, many of the project objectives could not be met, including fostering the future economic sustainability of the Resort. For all intents and purposes, this alternative appears to be similar to a No Project Alternative. Because a No Project Alternative is already analyzed below as Alternative 1, this alternative was considered but rejected from further consideration.

5.4.2.2 No West Hills Parkway Access Alternative

An alternative was requested during the scoping period that would not extend West Hills Parkway to the proposed hotel and clubhouse, which would reduce the development footprint of the project. The project is not proposing to extend West Hills Parkway to the proposed hotel and clubhouse. Rather, two driveways would be constructed at

West Hills Parkway to provide access only for Residential West residents, as no access to a public road is currently available from this landlocked parcel. Therefore, this alternative is not feasible because Residential West would be landlocked without the construction of the driveways. If the commenter is referring to the proposed “private utility maintenance road” which connects Residential West to Residential North, it should be noted that this road is not accessible to the general public. It would only be used for the following purposes: by the residents of the project to connect via golf carts to the resort amenities, by the golfers playing at the course, and for maintenance/utility vehicles to access the infrastructure along this corridor. The elimination of the private utility maintenance road would only minimally reduce the project footprint, if at all, because an alternative access road to maintain the utilities along the corridor would still be needed. Also, eliminating the maintenance road would decrease the connectivity of the Residential West homes to the resort facilities, which would undermine the project objective of fostering the future economic sustainability of the Resort and providing similar lifestyle experiences as other high-quality resorts in the region. It should also be noted that the Reduced Project Alternative (Alternative 2) would eliminate this roadway as it would not be necessary if Residential West is not proposed. Therefore, this alternative was considered but rejected for further consideration.

5.5 Alternatives Selected for Analysis

Based on the criteria described in Section 5.3, Selection of Alternatives, in addition to evaluating the No Project Alternative scenario, three other alternatives were carried forward. Alternatives that were carried forward and analyzed would reduce the project's environmental impacts. As shown, with the exception of the No Project Alternative, all of the alternatives include the same basic assumptions with respect to infrastructure and planning areas. However, each alternative eliminates or modifies at least one project element such that the reader is able to compare and contrast the environmental impacts of the various components. As required by CEQA, each alternative was crafted to reduce one or more of the significant impacts as compared to those of the project as proposed.

5.5.1 Alternative 1 – No Project Alternative

The No Project Alternative is required by CEQA to discuss and analyze potential impacts that would occur if the project were not implemented. Under the No Project Alternative, the site would continue to operate in its current state as the Carlton Oaks Golf Course, and the existing country club facility will continue to operate on PA-2. The golf course redevelopment, the construction of the Country Club and Resort, and the residential planning areas would not be implemented. The demolition of the existing Carlton Oaks golf course clubhouse, restaurant/bar, pro shop, hotel and hotel cottages, and surface parking lots (to allow for development of Residential North) would not occur. Ancillary improvements, such as the trail segments, access improvements, and off-site infrastructure improvements, would also not be constructed under this alternative. In other words, the no-project alternative would be the continuation of the existing operations.

5.5.2 Alternative 2 – Reduced Project Alternative

Alternative 2 is referred to as the *Reduced Project Alternative* because of the overall reduced intensity resulting from a reduction in residential units and the elimination of the new resort facilities from the resort planning area (PA-3). Alternative 2 proposes fewer residential units overall and would not develop new resort facilities, thereby reducing the development footprint; as such, it would also incorporate components of the suggested alternatives provided by the Wildlife Agencies that incrementally avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife-movement areas. As discussed in greater detail within Section 5.5.2,

Analysis of Alternative 2 – Reduced Project Alternative, below, this alternative was designed to reduce the development footprint and avoid or minimize impacts from potentially occurring at the Residential West site and resort sites. The Wildlife Agencies also requested the following:

- An “alternative that does not involve grade changes within the floodplain or floodway, or changes to the channels, and which do not require armoring or other stabilization techniques, which further impact stream functions.”

Alternative 2 and Alternative 3 meet this criterion.

- An “alternative that avoids impacts to stream, wetland, and riparian areas.”

The project itself already substantially avoids direct permanent impacts to the San Diego River and associated riparian areas. Alternative 2 would eliminate the proposed development at Residential North and the resort area and also would not implement the golf course redesign. This would eliminate the small amount of wetland/riparian impacts associated with the western portion of Residential North and would also eliminate the temporary impacts along Sycamore Canyon Creek. Alternative 2 fits these requirements.

- An “alternative that does not reduce the width of the wildlife movement corridor.”

The wildlife movement corridor is more restricted along Sycamore Canyon Creek in the western portion of the project site (the location of Residential West). Residential North affects this restriction very minimally. Therefore, Alternative 2 (which eliminates Residential West) addresses the concerns of this comment.

- An “alternative that includes a design which consolidates development to the north side of the project site.”

Alternative 2 addresses this comment by consolidating development on the northern side and eliminating the development to the west. Alternative 2 also eliminates the resort area, as well as the golf course redesign.

Specifically, under this alternative, no residential units would be constructed at Residential West. The project’s proposed resort facilities would not be built within PA-3, and the golf course would remain as is (i.e., no construction or disturbance at PA-3). The acres available for new residential construction at Residential North would be reduced to 8 acres due to the need to retain the existing country club facilities. The existing country club facilities remain essentially the same because the Residential North parcel is not large enough to reasonably accommodate all of the project’s residential units and the resort facilities. It is anticipated that up to 72 units could be constructed within the 8-acre footprint, resulting in an overall net decrease of 170 units. The residential units would be the same multifamily detached product type (9 dwelling units per acre [DU/acre]) as for the proposed project. Amenities at Residential North would include a play structure with resilient surfacing, picnic tables covered by a shade structure, a dog run area, an outdoor pool, pool house, dining tables, chaise lounge chairs, and outdoor showers. The residential uses would still be an accessory to the primary recreational use (golf course). Residents would be able to access recreational and commercial uses at the existing country club and golf course because of its proximity to the Country Club facility and the entrance to the golf course. This will result in a diversification of its customers and enhance membership opportunities to activate the facilities and the site year-round. The following design assumptions for this alternative are summarized as follows:

- Density would be 0 DU/acre at Residential West.
- The project’s proposed resort facilities, including the golf course, would not be built (i.e., there would be no construction or disturbance at the proposed resort area).

- Density at Residential North would be 72 units (9 DU/acre) with an overall net decrease in residential density of 170 units.
- The West Hills Parkway trail bench/connection would not be required.
- The eastern emergency vehicle access (EVA) connection via Vista del Verde, and associated reconstruction of bridge between Residential North and the eastern EVA, would likely not be possible because the roadway and bridge would not be built through PA-3 due to the size of the development (fewer than 100 units).
- The extension of the Padre Dam Municipal Water District (PDMWD) Public Water Main and the widening of West Hills Parkway would not be required, as no development would occur within Residential West.
- The private utility maintenance road between Residential West and Residential North would not be required.
- The southeastern Project Trail Segment/connection would change alignment, starting instead at the segment of the planned SANDAG trail located at the boundary of Santee and City of San Diego and traveling north, ending at the property line with Vista del Verde. A sewer lift station would still need to be placed within Residential North.

5.5.3 Alternative 3 – Reduced Resort Alternative

Alternative 3, the Reduced Resort Alternative, is another variation of a reduced project alternative and, like Alternative 2, incorporates components of the suggested alternatives provided by the Wildlife Agencies that incrementally avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife-movement areas. In addition to the Wildlife Agency-requested features and components discussed for Alternative 2, there was also a request for an “Alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, or water-dependent ecosystems and natural communities.” Alternative 3 fits the parameters of what is being requested by this comment by eliminating all development at Residential North and the Resort area. This alternative would also not be able to implement the golf course redesign, which means that there would be no development or grading within the vicinity of any existing streams or watercourses.

Specifically, under this alternative, the new Country Club and Resort facilities, including the golf course, would be eliminated from PA-3 (i.e., no construction or disturbance at the proposed resort area). The project would maximize the housing concentration at Residential West by transferring all the residential units from Residential North to Residential West, increasing the density at Residential West to the 22–30 DU/acre range. The residential units would consist of multifamily attached homes. A playground, picnic tables, shade structure, and an overlook area with bench seating would be located along the southwestern boundary of Residential West, and a dog run area with artificial turf and shade trees would be located in the eastern portion of Residential West. The residential uses would still be an accessory to the primary recreational use (golf course). Residents would be able to access recreational and commercial uses at the existing country club and golf course, which will result in a diversification of its customers and enhance membership opportunities to activate the facilities and the site year-round. The private utility maintenance road between Residential West and Residential North would still be built, providing residents with the ability to access recreational and commercial uses at the existing country club and golf course. The roadway will provide an interconnected system of golf cart paths, a multi-use path, and sidewalks that encourage pedestrian and bicycle access to these facilities. Other design assumptions for this alternative include the following:

- The residential density at Residential North would be 0 DU/acre.

- 156 residential units would be added to the 8.7-acre Residential West planning area (PA-1), for a total of 242 units (27.82 DU/acre).
- The project's proposed resort facilities would not be built within PA-3 (the resort area).
- Pursuant to the Wildlife Agency's request to include an alternative which avoids impacts onto existing surface flows, watercourses, water-dependent ecosystems, and natural communities, this alternative would not include the golf course redesign.
- The existing resort and hotel would remain in its existing condition.
- The private utility maintenance road between Residential West and Residential North would be required due to requirements to provide the sewer force main.
- The West Hills Parkway trail bench/connection and widening/roadway improvements on West Hills Parkway would still be required.
- The southeastern Project Trail Segment/connection would change alignment, starting instead at the segment of the planned SANDAG trail located at the boundary of Santee and City of San Diego and travel north ending at the property line with Vista del Verde.
- The eastern EVA connection via Vista del Verde, and associated reconstruction of bridge between Residential North and eastern EVA, would not be possible because PA-3 would not be implemented.
- The sewer lift station would remain in its proposed location within Residential West.
- The extension of the PDMWD Public Water Main would not be required.
- There would be 8.7 acres of usable space for residential (0.3 acres deducted for sewer station).

As discussed in greater detail within Section 5.5.3, Analysis of Alternative 3 – Reduced Resort Alternative, below, this alternative would contrast with Alternative 2 because it was designed to avoid impacts with the potential to occur on the eastern portion of the project site, at Residential North and the Country Club and Resort.

5.5.4 Alternative 4 – Reduced Footprint Project Alternative

Alternative 4 is referred to as the *Reduced Footprint Project Alternative* because of the overall reduction of the project's development footprint resulting from a reduction in the resort facilities in PA-3, the reduced intensity of development on the Residential North site, and the consolidation of the remaining residential units on the Residential West parcel, which has fewer environmental constraints. Specifically, under this alternative, the acres available for new residential construction at Residential North would be reduced to 16 acres to reduce the overall footprint of the project. It is anticipated that up to 135 units could be constructed within the 16-acre footprint, resulting in an overall net decrease of 21 units and a decrease in the overall footprint of 2.3 acres. The residential units would be the same multifamily detached product type (8 DU/acre) as for the proposed project. To make up for the 21 units lost at Residential North, the density at Residential West would be increased slightly in order to accommodate a total of 107 units on the 9.5-acre footprint. With a density of 11 DU/acre, the multifamily detached product type would not be feasible and would require switching the proposed units at Residential West to a clustered product type. The residential uses would still be an accessory to the primary recreational use (golf course). Residents would be able to access recreational and commercial uses, which will result in a diversification of its customers and enhance membership opportunities to activate the facilities and the site year-round. The private utility maintenance road between Residential West and Residential North would still be built, providing residents with the ability to access recreational and commercial uses at the country club and golf course. The roadway will provide an interconnected system of golf cart paths, a multi-use path, and sidewalks that encourage pedestrian and bicycle access to these facilities. The following design assumptions for this alternative are summarized as follows:

- Density at Residential North would be 135 units (8 DU/acre) on an approximately 16-acre footprint which has been reduced to avoid all biological resources impacts.
- To make up for the reduced density at Residential North, the unit count at Residential West would be increased to 107 units (11 DU/acre), and the product type would switch to a multifamily clustered product that have shared driveways and small yards.
- The footprint of PA-3 would be similarly reduced in order to reduce impacts on biological resources. Specifically, the footprint would be reduced by 0.22 acres (to 6.5 acres) in order to avoid impacts on Mule Fat Scrub – Disturbed, Nonnative Riparian, and Southern Cottonwood–Willow Riparian Forest – Disturbed. This alternative assumes that the reduced footprint would still be able to accommodate the clubhouse and restaurant; however, the hotel component would not be included in this alternative.
- The golf course would still be redesigned but to a lesser extent. This would necessarily result in some impacts on biological resources (approximately 0.48 acres); however, the redesign would be necessary because even with the reduced footprint of the Resort Area, the resort would need to eliminate portions of four of the existing holes.
- The West Hills Parkway trail bench/connection and widening/roadway improvements on West Hills Parkway would still be required.
- The eastern EVA connection via Vista del Verde, and associated reconstruction of bridge between Residential North and eastern EVA, would be constructed for secondary access.
- The sewer lift station would remain in its proposed location within Residential West.
- The extension of the PDMWD Public Water Main would be required.

As discussed in greater detail within Section 5.5.4, Analysis of Alternative 4 – Reduced Footprint Project Alternative, below, this alternative would contrast with Alternatives 2 and 3 because it would still develop all three planning areas, albeit on reduced footprints, and would still carry out a reduced version of the golf course redesign.

5.6 Analysis of Alternatives

This section discusses each of the project alternatives and determines whether each alternative would avoid or substantially reduce one or more of the significant impacts of the proposed project. This section also identifies any additional impacts resulting from the alternatives that would not result from the project and considers the alternatives' respective relationships to the project's basic objectives. A summary comparison of the impacts of the project and the alternatives under consideration is included as Table 5-2 at the end of this chapter. A summary comparison of the relationship of the project objectives for the project and the alternatives is included as Table 5-3 at the end of this chapter.

5.6.1 Analysis of Alternative 1 – No Project Alternative

5.6.1.1 Aesthetics and Visual Resources

The existing visual character of the project site is defined by recreational facilities. Specifically, an 18-hole golf course, a 52-room hotel, and a country club. The area is situated between Carlton Oaks Drive on the north, State Route (SR) 52 on the south, the San Diego Association of Governments (SANDAG) Mast Park West open space on the east, and West Hills Parkway on the west. The dominant visual components are those typical of golf courses, including a haphazardly shaped, expansive swath of manicured green grass dotted by sand pits, ponds, and the lighter green, circular, kidney-shaped or oval putting greens. Cart and pedestrian paths meander throughout. In

addition, several waterways travel through the project site, including Sycamore Canyon Creek, which crosses under Carlton Oaks Drive and merges with the San Diego River (North Channel).

Under Alternative 1, the existing condition, including the aforementioned features related to golf course uses, would remain. Therefore, no impacts would occur under Alternative 1 compared to the proposed project, which would have impacts related to the introduction of 85 two-story homes into the views of the golf course from the homes to the north. In addition, although the proposed project's impacts on a scenic vista resulting from construction of trail safety fencing would be less than significant with implementation of project design feature (PDF-)16, Security Fence Coloring (see Chapter 2, Project Description, for the full text of the PDF); Alternative 1 would have no impacts because no new fencing would be constructed.

5.6.1.2 Air Quality and Health Risk

The proposed project would increase both population and employment within the City of Santee. However, as discussed in Section 3.2.3.3, Local, the incremental increase in growth and employment associated with the proposed project would not cause a cumulatively considerable net increase of ozone, particulate matter less than 10 microns in diameter (PM₁₀) or particulate matter less than 2.5 microns in diameter (PM_{2.5}), and the project is consistent with the City of Santee *General Plan* that was provided to develop the Regional Air Quality Strategy (RAQS) or State Implementation Plan (SIP). Although the proposed project would have a significant impact with respect to the exceedance of the County's risk threshold for residential cancer risk during the construction period, this would be mitigated to less than significant through the implementation of Mitigation Measure (MM-)AQ-1.

In contrast, Alternative 1 would not include any construction activities or operational changes that would result in additional air pollutant emissions or any inconsistencies with the RAQS or SIP. Therefore, while impacts would be less than significant for the proposed project, there would nevertheless be an incremental reduction in impacts under this alternative because Alternative 1 would have no impacts related to the RAQS and SIP. In addition, Alternative 1 would not propose any construction and therefore would not have an increased cancer risk.

5.6.1.3 Biological Resources

The proposed project would have multiple significant, but mitigable impacts on biological resources, including the potential to adversely affect special-status wildlife species, disturb nesting birds and native wildlife species, damage sensitive vegetation, and impact wetland areas. All impacts on biological resources would be less than significant after implementation of MM-BIO-1 through MM-BIO-18.

Under Alternative 1, loss of habitat and habitat degradation would be avoided. In addition, no construction activities associated with the project would occur that would adversely affect wildlife special-status species, disturb nesting birds, or damage sensitive vegetation. Alternative 1 does not include development adjacent to wetland areas and impacts on wetlands would not occur. Potential dust, erosion, and runoff associated with construction activities, which could result in adverse effects on native wildlife species, would not occur. Therefore, biological resource impacts under Alternative 1 would be avoided compared to the proposed project.

5.6.1.4 Cultural and Tribal Cultural Resources and Human Remains

In the existing condition, the built environment was determined not to include any historical resources; therefore, neither the proposed project nor Alternative 1 would have an impact on historical resources.

Under the proposed project, all impacts on cultural resources resulting from excavation in areas with potential archaeological resources, human remains, and tribal cultural resources would be less than significant after implementation of **MM-CUL-1** through **MM-CUL-7**. In contrast, existing conditions would remain under Alternative 1, and no excavation or construction would occur. Consequently, Alternative 1 would result in no impacts related to archaeological and tribal cultural resources and inadvertent discovery of human remains compared to the project.

5.6.1.5 Energy

Project construction would require electricity for use in mobile offices, gasoline and diesel fuel for transportation of employees and haul trucks to and from the project site, and diesel fuel for operation of off-road equipment, and operation of the proposed project would involve the use of energy resources include employee and visitor vehicle trips, and utility-related consumption (e.g., electricity and natural gas in buildings, water consumption, wastewater and solid waste generation). These increases during both the construction and operations phases of the project were determined to be incremental increases that would be less than significant (without mitigation); and further, the proposed project was determined not to conflict with a state or local plan for renewable energy or energy efficiency.

In contrast, under Alternative 1, no construction or operational activities would occur, and energy demand would be lower than under the proposed project. Therefore, because energy demand would be lower, impacts under Alternative 1 would be reduced compared to the proposed project. However, Alternative 1 would not incorporate any sustainability features of the proposed project.

5.6.1.6 Geology and Soils and Paleontological Resources

The proposed project would have the potential to exacerbate the potential for liquefaction (at the resort area) and lateral spreading and soil collapse. This condition would require implementation of **MM-GEO-1** to reduce impacts to less-than-significant levels. The proposed project would not exacerbate the potential of a rupture of a known earthquake fault, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; or exacerbate the potential for impacts associated with expansive soils, and impacts were determined to be less than significant. The proposed project would not result in impacts associated with septic tanks or alternative wastewater disposal systems. However, the project site is also underlain by the Friars formation, which has a high sensitivity for paleontological resources. The proposed project would be required to implement **MM-GEO-2** in order to reduce paleontological impacts.

In contrast, under Alternative 1, there would be no ground-disturbing activities associated with excavation or construction, and there would be no potential to encounter paleontological resources at the project site. Although the proposed project would mitigate any potential impacts associated with geologic conditions during construction and excavation activities to below a level of significance, Alternative 1 would have no potential to exacerbate an existing geologic or soils condition. In addition, Alternative 1 would not have the potential to encounter paleontological resources. Therefore, Alternative 1 would avoid impacts related to geology and soils, and paleontological impacts would be eliminated when compared to the project.

5.6.1.7 Greenhouse Gas Emissions

Implementation of the proposed project would result in an increase of greenhouse gas (GHG) emissions from project construction and operation compared to existing conditions. However, as discussed in Section 3.7, Greenhouse Gas Emissions, the project's efficiency metric would be 1.39 metric tons of carbon dioxide equivalent (MTCO_{2e}) per

service population, which is below the 2.04 MTCO₂e per service population threshold of the Sustainable Santee Plan. The project would meet all requirements of the City of Santee's Sustainable Santee Plan Checklist items. The project would also meet the City of San Diego's CEQA significance determination thresholds of the Land Development Manual, and the City of San Diego's *Climate Action Plan (CAP) Consistency Regulations* (2022b). Furthermore, the proposed project would emit 954.97 MTCO₂e per year after implementation of the relevant PDFs (see Chapter 2). This works out to roughly 1.39 MTCO₂e per service population (SP) for the project which would be considerably less than the 2.04 MTCO₂e per SP threshold necessary for the City of San Diego to achieve its 2035 state-aligned emission target and future emission targets. As such, the proposed project would be consistent with the City of Santee's *Sustainable Santee Plan* (City of Santee 2019) as well the City of San Diego's 2022 CAP (City of San Diego 2022a). Therefore, the proposed project would not generate emissions that would either directly or indirectly have a significant impact on the environment, nor would the project conflict with the City of San Diego's plans, policies or regulations adopted for the purpose of reducing GHGs. Impacts would be less than significant.

In contrast, Alternative 1 would not include any construction or operational activities or added operational activities that would result in additional GHG emissions. Although the proposed project's GHG emissions would generally be similar to existing conditions, Alternative 1 would not include any specific GHG reduction measures to reduce emissions from existing uses or incorporate fewer clean technology/sustainability improvements. Therefore, GHG emissions under Alternative 1 would only be slightly reduced when compared to the proposed project.

5.6.1.8 Hazards and Hazardous Materials

The proposed project would involve demolition of existing structures at the Carlton Oaks Country Club, construction of a new Country Club and Resort, and residential development. These activities would involve the routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, and grease. Likewise, operation of the proposed project would result in the use of small amounts of typical hazardous materials often used for the operation and maintenance of the golf course, hotel, and residences. As described in Section 3.8.2.1, Hazardous Materials, a leaking underground storage tank (LUST) case was opened for the project site related to an unauthorized release of gasoline from an underground storage tank (UST) that was identified during closure and removal of the UST. The site was excavated in 1992 and was granted closure in November 1993. No further action was required by the County of San Diego Hazardous Materials Management Division, dependent on the continued use of the site as a golf course. The location of this former UST excavation area is south of the proposed resort facility, and the current project design shows that the proposed project does not plan to redevelop this area; as such, the previous County of San Diego stipulation that the site of the County of San Diego's Department of Environmental Health and Quality Case H20821-001 remain under golf course uses would still apply. Impacts would be less than significant.

However, the project site is located within the Airport Influence Area (AIA) for two airports, and the proposed project would include construction cranes, new utility poles, and the operation of a two-story, 38-foot tall building, the proposed project could exacerbate an existing safety hazard for people residing or working within the vicinity of the project site. As such, the project proponents would comply with the regulatory requirement needed to obtain FAA approval and ALUC review and determination for any construction equipment and operational structures proposed to be over 35 feet in height.

In contrast, under Alternative 1, there would be no ground-disturbing activities associated with construction, and there would be no potential to encounter possible soil contamination or contaminated sediment at the project site. Although the proposed project would mitigate any potential impacts from encountering hazardous materials during construction and excavation activities to below a level of significance, Alternative 1 would have no

potential to exacerbate an existing hazardous materials condition. In addition, Alternative 1 would not introduce new uses or construction equipment into the AIA of two airports. Therefore, Alternative 1 would avoid hazards and hazardous materials impacts, and impacts would be slightly reduced when compared to the project.

5.6.1.9 Hydrology and Water Quality

The proposed project would disturb 143 acres of land (Appendix K, Storm Water Quality Management Plan). Therefore, compliance with the Construction General Permit would require development and implementation of a stormwater pollution prevention plan (SWPPP), which would identify which construction best management practices (BMPs) would be implemented in order to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness. In addition to the SWPPP, the project proponents would be required to implement the construction BMPs identified in the City of Santee's *Jurisdictional Runoff Management Plan* (JRMP) (City of Santee 2021) and the City of San Diego's JRMP (City of San Diego 2023). Due to existing regulations and both cities' water quality programs, the proposed project would not result in any significant water quality impacts. However, the proposed golf course would reshape the existing ponds on the golf course and grading for portions of the residential development areas would occur within the floodplain limits. Additionally, a small portion of the northern residential development encroaches into the floodway. The proposed grading for the clubhouse, resort, and the golf course would occur within the regulatory floodway. Therefore, **MM-HYD-1** would be required to ensure hydrology and flooding impacts are reduced to less than significant.

In contrast, under Alternative 1, no construction would occur within either the City of San Diego or City of Santee's jurisdiction, and the existing golf course and associated structures would remain in their existing condition. No construction would occur within the floodway. Therefore, impacts would be avoided under Alternative 1 as compared to the proposed project.

5.6.1.10 Land Use and Planning

The proposed project would not involve features, such as the construction of major new roads or demolition of existing roads, which would divide the established neighborhoods in the surrounding area. Therefore, impacts related to the division of an established community would be the same as the no-project alternative of less than significant. As demonstrated in Section 3.10, Land Use, the proposed project would also not conflict with applicable land use plans.

Similar to the proposed project, this alternative would not result in the division of an established community or conflict with local land use plans, including SANDAG's Regional Plan and the City's General Plan and zoning designations, because under Alternative 1, the project site would remain in its existing condition and the Carlton Oaks Golf Course, and the existing country club facility would continue to operate. While the PD zone is intended to encourage innovative, high-quality development, an existing resort is already located on the site within the PD zone that is also an allowed use in that zone and is consistent with the General Plan in most regards. If the project is not approved, the property owner can continue to operate the existing resort facility without having to construct any of the costly ancillary improvements, such as the trail segments, access improvements, and off-site infrastructure improvements. Although Alternative 1 would have similar impacts compared to the proposed project, Alternative 1 would not further the project objectives related to providing a high-quality, mixed-use recreational resort. If the project is not approved land use impacts under Alternative 1 would be similar to the proposed project, however the full potential of the PD zone would not be realized to the same extent as envisioned for the PD zone.

5.6.1.11 Mineral Resources

The project site is underlain primarily by MRZ-2 (areas of known resources), with small areas of MRZ-3. Although there is the potential of mineral recovery from the MRZ-2 and MRZ-3 areas on the project site, in accordance with the City of Santee's *General Plan – Conservation Element* (City of Santee 2003), economic, land use compatibility, and environmental protection factors must be considered when deciding on the appropriateness of mining in a particular area, the Santee General Plan designates the project site for Planned Development, not mineral resources extraction. Furthermore, consistent with the City of Santee's *General Plan – Conservation Element's* Objective 10.0, approximately 38% of the project site would remain undeveloped as open space and golf course uses, and the mineral resources like aggregate and sediment in the open space would not be lost to the region. Impacts were determined to be less than significant.

In contrast, Alternative 1 would leave the project site in its existing condition, wherein the existing structures at Carlton Oaks Country Club would preclude the extraction of mineral resources, but the remainder of the golf course would be available for aggregate mining (subject to compatibility factors). Although impacts of the proposed project would be less than significant, those impacts would be incrementally greater in areas such as Residential West and the resort area which would preclude mineral extraction. Therefore, mineral resources impacts would be reduced for Alternative 1 compared to the proposed project.

5.6.1.12 Noise and Vibration

Implementation of the proposed project would not create noise impacts as long as all construction activity occurs within both cities' permitted days and hours, and if noticing is provided to all property owners and residents within 300 feet of the project site at least 10 days before the start of construction. However, significant impacts could occur at existing residences due to noise from on-site mechanical equipment at the hotel and clubhouse, at existing residences due to noise from the on-site sewer lift station, and at proposed new residences due to future traffic noise. Regulatory Compliance Measure (**RCM-NOI-1** through **RCM-NOI-4**) would be required to reduce construction noise. **MM-NOI-1** would ensure that proposed residential development complies with City of Santee's *General Plan – Noise Element* development standards related to future noise exposure. **MM-NOI-2** would be required for traffic noise impacts at proposed on-site residences. Lastly, **MM-NOI-3** would ensure that the project does not generate excessive noise levels from music at the proposed hotel and clubhouse, and **MM-NOI-4** would ensure no impacts from vibration would occur.

In contrast, Alternative 1 would entirely eliminate impacts related to noise and vibration identified for the project because there is no construction proposed, which eliminates the possibility of construction, mechanical, traffic, and sewer lift station-related impacts as well as groundborne vibration. Therefore, Alternative 1 would not result in any significant construction noise or vibration impacts and would result in reduced operational noise impacts compared to the proposed project.

5.6.1.13 Population and Employment

As discussed in Section 3.13, Population and Housing, implementation of the proposed project would not result in substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure). As such, project impacts related to population, housing, and employment growth would be less than significant.

Under Alternative 1, no impacts associated with substantial unplanned population growth in an area, either directly or indirectly, would occur because there is no new construction involved, and the existing land uses within the project area would be served by existing roadways, water, wastewater, gas, and electrical infrastructure. Therefore, population growth impacts under Alternative 1 would be avoided as compared to the proposed project.

5.6.1.14 Public Services

The proposed project would operate as residential neighborhoods, a golf course, a clubhouse and resort, and complementary retail. In addition to guest rooms, the hotel would provide space for special events such as golf tournaments, weddings, banquets, and conferences. As discussed in Section 3.14, Public Services, implementation of the proposed project would not result in the need for new or physically altered fire protection or police facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services, nor would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered schools or libraries. Impacts would be less than significant.

In contrast, even though the proposed project would not have significant impacts, Alternative 1 would not result in any residential development and therefore would have reduced impacts relative to the provision of public services as compared to the proposed project.

5.6.1.15 Recreation

The proposed project would operate as a mixed-use recreation-related country club resort, with a number of recreational facilities including a golf course, pool, parks, trails, and other recreational amenities. Therefore, as discussed in Section 3.15, Recreation, implementation of the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

Even though Alternative 1 would not result in any additional residential development, the proposed project would not have significant impacts, and therefore, impacts relative to the provision of recreational facilities would be the same as compared to the proposed project.

5.6.1.16 Transportation and Circulation

As discussed previously in Section 5.5.1.16, Transportation, Circulation, and Parking, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Residents would be able to access recreational and commercial uses at the country club and golf course via an interconnected system of golf cart paths, a multi-use path, and sidewalks that encourage pedestrian and bicycle access to these facilities. The project applicant is working on plans to incorporate a portion of the existing SANDAG trail into the project, which travels through the eastern portion of the project site within City of Santee's jurisdiction, thereby closing the gap in the trail between the intersection of Mast Boulevard/SR-52 EB Ramps and the eastern proposed project boundary. A portion of this trail on the western portion of the project site within the City of San Diego's jurisdiction would be constructed by SANDAG. Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system.

As shown in **Error! Reference source not found.**, the proposed project's residential uses are anticipated to generate a VMT/Capita of 22.8 miles/person, which is 5.1 miles (22.4%) over the City of Santee's significance threshold (17.7 miles/person) and the City of San Diego's threshold (16.1 miles/person). Also shown in Table 3.16-4, the proposed

project's commercial uses are anticipated to generate a VMT/Employee of 19.3 miles, which is 3.2 miles/employee (16.6%) over the City of Santee and the City of San Diego's threshold (16.1 miles/employee). Impacts would be potentially significant and **MM-TRA-1** would be required. However, there is no mitigation feasible which would mitigate VMT-related impacts to less than significant. This is due to the fact that the project site is located in a VMT-inefficient area, and the only way to reduce VMT impacts to less than significant would be to propose a project in another location. Therefore, VMT-related impacts would remain significant and unavoidable even with implementation of **MM-TRA-1**, which would implement TDM measures which would reduce commercial and residential VMT by 3.1% and 2.0%, respectively.

Adherence to the traffic control plan (PDF-12, Traffic Control Plan) would ensure that any changes to existing traffic flow patterns will be minimal and be limited to the surrounding project area. Therefore, the overall traffic circulation in the vicinity of the proposed project should not be affected. In addition, all streets would meet or exceed Santee Fire Department (SFD) requirements, and a signal warrant study performed by Intersecting Metrics determined that the project driveways function safely and adequately without a need for traffic signalization. The proposed project would have a less-than-significant impact related to increased hazards due to a geometric design feature or incompatible uses.

Since Alternative 1 proposes no land use changes to the project site, the site would remain open only to commercial / recreational uses. As prescribed in the City of Santee's VMT Analysis Guidelines, April 13, 2022, the VMT threshold of significance for a Regional Retail, Regional Recreational, or Regional Public Facilities is any net increase in total regional VMT. Since no new uses would be added to the site nor would any of the existing uses be expanded under this alternative, there would be no net increase in VMT. Thus, this alternative would result in a less-than-significant transportation related impact. As such, impacts of Alternative 1 would be reduced as compared to the proposed project.

5.6.1.17 Utilities and Service Systems

To meet the demands of the proposed project, new and expanded infrastructure and facilities (i.e., water, wastewater treatment, stormwater drainage, electric power, natural gas, telecommunications facilities, and solid waste removal) would be required to accommodate the additional development, the construction of which could result in physical impacts on the environment related to air quality, biological resources, cultural and tribal cultural resources, geology, soils, paleontological resources, and noise. Impacts would be potentially significant, requiring implementation of mitigation measures detailed in Section 3.2, Air Quality and Health Risks; Section 3.3, Biological Resources; Section 3.4, Cultural and Tribal Cultural Resources; Section 3.6, Geology and Soils; and Section 3.12, Noise and Vibration. As described in these EIR sections, all impacts would be reduced to less than significant with the implementation of mitigation.

In contrast, demand for water; generation of wastewater treatment or stormwater drainage; electrical power, natural gas, or telecommunications facilities; and generation of solid waste would remain the same as under existing conditions for Alternative 1. As such, while the proposed project's impacts would be mitigated, the updated golf course would be more water-efficient, and the Country Club and Resort facilities would be more energy efficient, Alternative 1's impact on utilities and service systems would not require any mitigation and would be reduced compared to the project.

5.6.1.18 Wildfire

During construction, temporary lane closures and construction-related traffic within the project site could delay or obstruct the movement of emergency vehicles, which is considered to be a potentially significant impact. However, compliance with the City of Santee and City of San Diego regulations, the measures established by the Operational Area Emergency Plan (OA EOP; Unified San Diego County Emergency Services Organization and County of San Diego 2022) and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) (County of San Diego 2023), and the requirements of the traffic control plan, would reduce potential impacts associated with interference with applicable emergency response plans to less than significant.

During the operations phase, the proposed project would implement the Fire Protection Plan (FPP) (Appendix R1) that has been prepared to provide fire planning guidance and requirements for reducing fire risk and demand for fire protection services. Site access would comply with the requirements of the California Fire Code and City of Santee Municipal Code. Therefore, operation of the proposed project would not significantly impair an adopted response plan or emergency evacuation plan, and impacts would be less than significant.

Under Alternative 1, new development would not occur on the site, so an FPP would not be prepared, and the existing Country Club and Resort would remain without the updated construction elements that reduce potential fire risks. Nor would Alternative 1 be required to have fuel modification zones that would provide an additional level of protection to the surrounding residential uses. Even though the project would introduce 242 new residences (plus one existing residence that would remain) onto the site, an increase in the risk of vegetation ignitions and wildfires would not be materially increased by the project as compared to Alternative 1, because of the requirements listed in PDF-11, Fire Protection Measures, and other factors listed in the FPP, such as the housing units being built with updated Fire Code requirements. Alternative 1 would still have a need for evacuation from the project site in case of emergency whereas, the project would provide new emergency access points and improvements would be made to Carlton Oaks Drive and West Hills Parkway. Because no alteration of the site would occur under Alternative 1 it would not expose people or structures to significant risks involving flooding or landslides due to post-fire slope stability or drainage changes, similar to the proposed project. However, because Alternative 1 does not have an FPP or Evacuation Plan in place and because the structures associated with the existing Country Club and Resort would not be renovated or rebuilt to current standards as identified in the updated Fire Code, there is an increased risk related to exposing people and structures to risks associated with wildfire or post-wildfire effects. As a result, Alternative 1 may have slightly increased impacts with respect to wildfire when compared to the proposed project.

5.6.1.19 Relationship to Project Objectives and Summary of Impacts

Compared to the project, the No Project Alternative would avoid or substantially reduce impacts related to aesthetics, air quality, biological resources, cultural and tribal cultural resources, energy, geology and soils (including paleontological resources), GHG emissions, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, population and housing, public services, recreation, utilities, and wildfire and would also avoid the significant and unavoidable transportation impacts resulting from the exceedance of the VMT thresholds for both commercial and residential uses. However, the No Project Alternative would not meet any of the project objectives as shown in Table 5-3.

5.6.2 Analysis of Alternative 2 - Reduced Project Alternative

5.6.2.1 Aesthetics and Visual Resources

As discussed in Section 5.5.1.1, Aesthetics and Visual Resources, the existing visual character of the project site is defined by recreational facilities, including a golf course, hotel, and a country club. The dominant visual components are those typical of golf courses. In addition, several waterways travel through the project site, including Sycamore Canyon Creek, which crosses under Carlton Oaks Drive and merges with the San Diego River (North Channel).

Under Alternative 2, the golf course redesign would not occur, and Residential West and the new Country Club and Resort would not be developed; instead, Residential North would retain the existing clubhouse and hotel and would also develop 72 units at 8 DU/acre. This means that the less-than-significant impacts related to the introduction of 86 two-story homes (at Residential West) into the views of the golf course from the homes to the north would not occur, and the less-than-significant impacts of introducing 156 units into Residential North would be further decreased due to the reduction in the number of units to 72. Additionally, the introduction of a new Country Club and Resort into the visual setting, along the eastern portion of the golf course, would not occur. Some trail segments and associated safety fencing would still be constructed under Alternative 2 so impacts on a scenic vista resulting from construction of trail safety fencing be similar to the proposed project. Consequently, although the project's impacts are concluded to be less than significant with mitigation (refer to Section 3.1.5, Project Impacts and Mitigation Measures, in Section 3.1, Aesthetics and Visual Resources), impacts would nevertheless be slightly reduced under Alternative 2 compared to the project because no development would occur at Residential West or the resort area, and the total number of units being implemented at Residential North would be reduced from 156 units to 72 units.

5.6.2.2 Air Quality and Health Risk

As discussed previously in Section 5.5.1.2, Air Quality and Health Risk, the proposed project would increase both population and employment within the City of Santee. However, as discussed in Section 3.2.3.3, the incremental increase in growth and employment associated with the proposed project would not cause a cumulatively considerable net increase of ozone, PM₁₀, or PM_{2.5} and would be consistent with the Santee General Plan that was provided to develop the SIP and RAQS. While the proposed project would have a significant impact with respect to the exceedance of the County's risk threshold for residential cancer risk during the construction period, this would be mitigated to less than significant through the implementation of **MM-AQ-1**.

Alternative 2 would result in similar impacts as the proposed project related to consistency with the RAQS or SITP because, like the project, it would be consistent with the General Plan and would not exceed the total number of residential units identified in such plans. But like the project, the City of Santee would be required to transmit a revised forecast to SANDAG, followed by updates to the RAQS and SIP.

Impacts associated with criteria air pollutant emissions during construction would be reduced under Alternative 2 as compared to the proposed project due to the reduction in density and the fact that the resort facilities and the redesigned golf course would not be constructed. Impacts to sensitive receptors would still apply to Alternative 2, although there is less construction overall with the elimination of Residential West and the Resort and the reduction of units at Residential North. Operational emissions associated with stationary sources (e.g., architectural coatings, consumer products, landscape equipment, and energy use) and associated with mobile emissions (vehicle trips) would be less than the proposed project due to a smaller number of residential units on the project site. Similar to

the proposed project, Alternative 1 would result in a negligible increase in traffic delay and would not generate significant increases in CO resulting in exposure of sensitive receptors to CO hotspots.

In addition, similar impacts from toxic air contaminants and operational health impacts on sensitive receptors would occur under this alternative due to similar construction activities and operational land uses but to a lesser extent than the proposed project. Mitigation Measures would be required to reduce impacts and cumulative increases in criteria pollutant emissions from construction and operation, similar to the proposed project. Therefore, there would be a reduction in impacts for Alternative 2 as compared to the proposed project.

5.6.2.3 Biological Resources

The proposed project would have multiple significant, but mitigable impacts on biological resources, including the potential to adversely affect special-status wildlife species, disturb nesting birds and native wildlife species, damage sensitive vegetation, and impact wetland areas. All impacts on biological resources would be less than significant after implementation of **MM-BIO-1** through **MM-BIO-18**.

Under Alternative 2, impacts to wildlife and sensitive species would be avoided at the golf course, Residential West, and at the resort area (PA-3); however, there would still be excavation and construction within areas that have the potential to adversely affect special-status wildlife species, disturb nesting birds and native wildlife species, damage sensitive vegetation, and impact wetland areas. Potential dust, erosion, and runoff associated with construction activities, which could result in adverse effects on native wildlife species, would still occur; however, potential dust, erosion, and runoff would be reduced due to the reduction in excavation. Consequently, although Alternative 2 would still require the implementation of mitigation in order to reduce significant impacts; it would result in reduced impacts to biological resources compared to the project because of the avoidance of all resources within the golf course, Residential West, and resort area.

5.6.2.4 Cultural and Tribal Cultural Resources and Human Remains

In the existing condition, the built environment was determined not to include any historical resources; therefore, neither the proposed project nor Alternative 2 would have an impact on historical resources.

Under the proposed project, all impacts on cultural resources resulting from excavation in areas with potential archaeological resources, human remains, and tribal cultural resources would be less than significant after implementation of **MM-CUL-1** through **MM-CUL-7**.

Under Alternative 2, there would still be excavation and construction within areas that have the potential to contain archaeological resources. However, the significant, but mitigable impacts to archaeological resources due to the private utility maintenance road which would run between Residential West and Residential North would not occur. In addition, there would be significantly less excavation occurring across the site overall due to the fact that the resort facilities and golf course redesign would not occur under this alternative. Consequently, although Alternative 2 would still require the implementation of mitigation in order to reduce significant impacts, it would result in reduced impacts related to archaeological and tribal cultural resources and inadvertent discovery of human remains compared to the project simply because of a reduction in the acreage to be excavated and the elimination of the private utility maintenance road.

5.6.2.5 Energy

Project construction would require electricity for use in mobile offices, gasoline, and diesel fuel for transportation of employees and haul trucks to and from the project site, and diesel fuel for operation of off-road equipment, and operation of the proposed project would involve the use of energy resources include employee and visitor vehicle trips, and utility-related consumption (e.g., electricity and natural gas in buildings, water consumption, wastewater, and solid waste generation). These increases during both the construction and operations phases of the project were determined to be incremental increases that would be less than significant (without mitigation). Further, the proposed project was determined not to conflict with a state or local plan for renewable energy or energy efficiency.

Alternative 2 would still propose construction of 72 units, increasing the overall energy demand for the site; however, it would represent a reduction in impacts compared to the proposed project due to the reduced density and the fact that the resort facilities and golf course redesign would not occur.

5.6.2.6 Geology and Soils and Paleontological Resources

The proposed project, specifically the resort, would have the potential to exacerbate the potential for liquefaction and lateral spreading and soil collapse. This condition would require implementation of **MM-GEO-1** to reduce impacts to less-than-significant levels. The proposed project would not exacerbate the potential of a rupture of a known earthquake fault, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; or exacerbate the potential for impacts associated with expansive soils, and impacts were determined to be less than significant. The proposed project would not result in impacts associated with septic tanks or alternative wastewater disposal systems. However, the project site is also underlain by the Friars formation, which has a high sensitivity for paleontological resources. The proposed project would be required to implement **MM-GEO-2** in order to reduce impacts to paleontological resources.

Alternative 2 would similarly require ground-disturbing activities associated with excavation in order to implement the 72 units at Residential North and would correspondingly need to implement **MM-GEO-2**. However, because the potential for liquifiable soils exists only at the resort location, there would not be a requirement to implement **MM-GEO-1** under Alternative 2. Therefore, implementation of Alternative 2 represents a reduction in impacts due to the elimination of the new resort facilities and golf course redesign, the building footprints at Residential West and the resort area, as well as the elimination of a need to implement **MM-GEO-1** to preclude potential issues associated with the liquefiable soils present at the project site. Should Alternative 2 be adopted, the applicant would still need to implement **MM-GEO-2** to reduce impacts associated with paleontological resources. Overall, impacts would be slightly reduced compared to the proposed project.

5.6.2.7 Greenhouse Gas Emissions

As discussed above for Alternative 1, the proposed project would not generate emissions that would either directly or indirectly have a significant impact on the environment, nor would the project conflict with the City of Santee's plans, policies or regulations adopted for the purpose of reducing GHGs. Impacts would be less than significant.

Although GHG emissions would generally be similar to those of the proposed project, Alternative 2 represents a reduction in the number of residential units being built and a corresponding decrease in VMT and would therefore represent an incremental reduction in the production of long-term operational GHG emissions from mobile source emissions as compared to the proposed project. However, impacts would be less than significant for both the project and Alternative 2 with the application of the relevant PDFs (see Chapter 2). Like the project, Alternative 2

would be required to incorporate the City of Santee's Sustainable Santee Plan Checklist items. Alternative 2 would also be required to meet the City of San Diego's CEQA significance determination thresholds of the Land Development Manual, and the City of San Diego's *CAP Consistency Regulations* (2022b). As such, the proposed project would be consistent with the City of Santee's *Sustainable Santee Plan* (City of Santee 2019) as well the City of San Diego's 2022 CAP (City of San Diego 2022a).

5.6.2.8 Hazards and Hazardous Materials

As discussed previously in Section 5.5.1.8, Hazards and Hazardous Materials, it was determined that impacts due to routine transport, use, and disposal of hazardous materials during construction and operation of the proposed project would be less than significant. Additionally, the project site being located within the AIA for two airports, can be avoided because the project would be required to obtain FAA approval and ALUC review and determination for any construction equipment and operational structures proposed to be over 35 feet in height.

Similar to the proposed project, Alternative 2 does not include any construction within the area where the UST was removed and remediated. In addition, Alternative 2 would introduce new uses or construction equipment into the AIA of two airports. As such, Alternative 2 would need to comply with the regulatory requirement to obtain FAA approval and ALUC review and determination for any construction equipment and operational structures proposed to be over 35 feet in height. Therefore, while Alternative 2 is similar to the proposed project in many respects, there would be an overall slight reduction in impacts due to the general reduction in the amount of acreage disturbed by grading.

5.6.2.9 Hydrology and Water Quality

The proposed project would disturb 118.7 acres of land (Appendix K). Therefore, compliance with the Construction General Permit would require development and implementation of a SWPPP, which would identify which construction BMPs would be implemented to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness. In addition to the SWPPP, the project proponents would be required to implement the construction BMPs identified in the City of Santee's JRMP and the City of San Diego's JRMP. Due to existing regulations and both cities' water quality programs, the proposed project would not result in any significant water quality impacts. However, the proposed golf course would reshape the existing ponds on the golf course and grading for portions of the residential development areas would occur within the floodplain limits. Additionally, a small portion of Residential North encroaches into the floodway. The proposed grading for the clubhouse, resort, and the golf course would occur within the regulatory floodway. Therefore, mitigation measure **MM-HYD-1** would be required in order to ensure hydrology and flooding impacts are reduced to less than significant.

In contrast, under Alternative 2, two of the three planning areas (Residential West and the resort area) would be eliminated. Therefore, while Alternative 2 would still need to implement **MM-HYD-1** because of the development of the residential units at the Residential North site, there would be a reduction in hydrology and flooding impacts due to the overall reduction in grading and the fact that there would be no resort-or golf course associated grading within the floodway.

5.6.2.10 Land Use and Planning

The proposed project would not involve features, such as the construction of major new roads or demolition of existing roads, which would divide the established neighborhoods in the surrounding area. Therefore, impacts related to division of an established community would be less than significant. In addition, based on the land use

consistency table (Table 3.10-1), the proposed project would be consistent with the land use plans and policies adopted for the purposes of mitigating or avoiding an environmental impact and impacts would be less than significant. Similar to the proposed project, this alternative would not result in the division of an established community or conflict with local land use plans, including SANDAG's Regional Plan and the City's General Plan and zoning designations, because under Alternative 2, the Carlton Oaks Golf Course, and the existing country club facility would continue to operate. While the PD zone is intended to encourage innovative, high-quality development, an existing resort is already located on the site within the PD zone that is also an allowed use in that zone and is consistent with the General Plan in most regards. If the project is not approved, the property owner can continue to operate the existing resort facility and would only have to construct some of the costly ancillary improvements in order to accommodate the proposed 72 homes; such as the trail segments, access improvements, and off-site infrastructure improvements. However, under this alternative, golf course redevelopment, construction of the new Country Club and Resort, and units in Residential West would not be implemented. Therefore, while Alternative 2 would have similar impacts compared to the proposed project, Alternative 2 would not further the goals or design envisioned for the PD zone to the same extent as the project.

5.6.2.11 Mineral Resources

The project site is underlain primarily by MRZ-2 (areas of known resources), with small areas of MRZ-3. Although there is the potential of mineral recovery from the MRZ-2 and MRZ-3 areas on the project site, in accordance with the City of Santee's *General Plan – Conservation Element*, economic, land use compatibility, and environmental protection factors must be considered when deciding on the appropriateness of mining in a particular area, the Santee General Plan designates the project site for Planned Development, not mineral resources extraction. Furthermore, consistent with the City of Santee's *General Plan – Conservation Element's* Objective 10.0, approximately 61.5% of the project site would remain undeveloped as open space and golf course uses, and the mineral resources like aggregate and sediment in the open space would not be lost to the region. Impacts were determined to be less than significant.

Similarly, Alternative 2 would develop portions of the project site, which would preclude the extraction of mineral resources, but the remainder of the golf course would be available for aggregate mining (subject to compatibility factors). Although impacts of both the proposed project and Alternative 2 would be less than significant, impacts for the latter would be incrementally reduced as compared to the proposed project because there would be no permanent structures at Residential West or the resort area.

5.6.2.12 Noise and Vibration

Implementation of the proposed project would create noise impacts if construction activity were to occur outside the City of Santee's permitted days and hours or if notice is not provided to all property owners and residents within 300 feet of the project site at least 10 days before the start of construction. Significant impacts would also occur at existing residences due to noise from on-site mechanical equipment at the hotel and clubhouse, at existing residences due to noise from the on-site sewer lift station, and at proposed new residences due to future traffic noise. Regulatory Compliance Measure (**RCM-NOI-1** through **RCM-NOI-4**) would be required to reduce construction noise. **MM-NOI-1** would ensure that proposed residential development complies with City of Santee's *General Plan – Noise Element* development standards related to future noise exposure. **MM-NOI-2** would be required for traffic noise impacts at proposed on-site residences. Lastly, **MM-NOI-3** would ensure that the project does not generate excessive noise levels from music at the proposed hotel and clubhouse, and **MM-NOI-4** would ensure no impacts from vibration would occur.

In contrast, Alternative 2 would entirely eliminate impacts related to noise and vibration identified for the resort area and the golf course, as well as at Residential West because there is no construction proposed at those locations. This eliminates the possibility of construction, mechanical, traffic, and sewer lift station-related impacts as at those locations as well as groundborne vibration. Therefore, while mitigation would still be required (with the exception of **MM-NOI-2**), Alternative 2 would result in reduced noise and vibration impacts compared to the proposed project.

5.6.2.13 Population and Employment

As discussed in Section 5.5.1.13, Population and Employment, implementation of the proposed project would not result in substantial unplanned population growth in the project area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure). As such, project impacts related to population, housing, and employment growth would be less than significant.

Under Alternative 2, residential units would be constructed at Residential North, but Residential West and the resort area would remain in their existing condition. There, there would be a reduction in impacts associated with Alternative 2 due to the net reduction of 170 units. Therefore, impacts would be reduced as compared to the proposed project.

5.6.2.14 Public Services

The proposed project would operate as residential neighborhoods, a golf course, a clubhouse and resort, and complementary retail. In addition to guest rooms, the hotel would provide space for special events such as golf tournaments, weddings, banquets, and conferences. As discussed in Section 5.5.1.14, Public Services, implementation of the proposed project would not result in the need for new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services, nor would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered schools or libraries. Impacts would be less than significant.

In contrast, even though the proposed project would not have significant impacts, Alternative 2 would result in a net reduction of 170 units and therefore would have reduced impacts relative to the provision of public services as compared to the proposed project.

5.6.2.15 Recreation

The proposed project would operate as a mixed-use recreation-related country club resort with a number of recreational facilities including, a golf course, pool, parks, trails, and other recreational amenities. As discussed in Section 5.5.1.15, Recreation, implementation of the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

In contrast, even though the proposed project would not have significant impacts, Alternative 2 would have a net reduction in density (170 fewer residential units) and therefore would have reduced impacts relative to the provision of recreational facilities as compared to the proposed project.

5.6.2.16 Transportation and Circulation

As shown in **Error! Reference source not found.**, the proposed project's residential uses are anticipated to generate a VMT/Capita of 22.8 miles/person, which is 5.1 miles (22.4%) over the City of Santee's significance threshold (17.7 miles/person) and the City of San Diego's threshold (16.1 miles/person). Also shown in Table 3.16-4, the proposed project's commercial uses are anticipated to generate a VMT/Employee of 19.3 miles, which is 3.2 miles/employee (16.6%) over the City of Santee and the City of San Diego's threshold (16.1 miles/employee). Impacts would be potentially significant and **MM-TRA-1** would be required. However, there is no mitigation feasible which would mitigate VMT-related impacts to less than significant. This is due to the fact that the project site is located in a VMT-inefficient area, and the only way to reduce VMT impacts to less than significant would be to propose a project in another location. Therefore, VMT-related impacts would remain significant and unavoidable even with implementation of **MM-TRA-1**, which would implement TDM measures which would reduce commercial and residential VMT by 3.1% and 2.0%, respectively.

Alternative 2 would not develop Residential West or the proposed resort area and would implement 170 fewer residential units as compared to the proposed project. Nevertheless, Alternative 2 would be located in the same VMT-inefficient location as the proposed project. As such, Alternative 2 even with the reduction of units, would suffer from the same circumstances which cause the proposed project to have significant and unavoidable VMT-related impacts. Therefore, impacts of Alternative 2 would be similar to the proposed project.

5.6.2.17 Utilities and Service Systems

To meet the demands of the proposed project, new and expanded infrastructure and facilities (i.e., water, wastewater treatment, stormwater drainage, electric power, natural gas, telecommunications facilities, and solid waste removal) would be required to accommodate the additional development, the construction of which could result in physical impacts on the environment related to air quality, biological resources, cultural and tribal cultural resources, geology, soils, paleontological resources, and noise. Impacts would be potentially significant, requiring implementation of mitigation measures detailed in Section 3.2, Section 3.3, Section 3.4, Section 3.6, and Section 3.12. As described in these EIR sections, all impacts would be reduced to less than significant with the implementation of mitigation.

Alternative 2 would not construct the resort facilities, implement the golf course redesign, or develop Residential West (with only 72 units at Residential North). This would result in a net reduction of 170 residential units as compared to the proposed project. As such, while the proposed project's impacts would be mitigated, Alternative 2's impact on utilities and service systems would be reduced compared to the project because of the reduced number of residential units.

5.6.2.18 Wildfire

During construction, temporary lane closures and construction-related traffic within the project site could delay or obstruct the movement of emergency vehicles, which is considered to be a potentially significant impact. Compliance with the City of Santee and City of San Diego regulations, the measures established by the OA EOP and MJHMP, and the requirements of the traffic control plan, would reduce potential impacts associated with interference with applicable emergency response plans to less than significant.

During the operations phase, the proposed project would implement the FPP (Appendix R1) that has been prepared to provide fire planning guidance and requirements for reducing fire risk and demand for fire protection services.

Site access would comply with the requirements of the California Fire Code and City of Santee Municipal Code. Given the flat characteristics of the project site and the proposed improvements, post-fire conditions would not be expected to increase risks associated with slope failures, mudflows, or landslides. Therefore, operation of the proposed project would not significantly impair an adopted response plan or emergency evacuation plan and impacts would be less than significant, the same as the project.

Although more people would be added by the project than under Alternative 2, the risk of wildfires would not be materially increased by the project because of the requirements listed in PDF-11, Fire Protection Measures, and other requirements set forth in the FPP such as the homes being required to build consistent with the most updated Fire Code requirements. In addition, this alternative like the project would include ignition-resistant development, effective FMZs including management and maintenance, and fire-safe features to limit project occupant exposure and prevent exacerbated wildfire risk. Similar to the proposed project, this alternative would require the installation or maintenance of associated infrastructure (such as streets, fuel breaks, emergency water sources, power lines, or other utilities) such that it would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. However, the eastern EVA connection via Vista del Verde, and associated reconstruction of bridge between Residential North and the eastern EVA, would likely not be needed due to the size of the development (fewer than 100 units). As such, impacts with respect to the construction of this emergency access roads would not occur. Overall, with respect to wildfire, impacts associated with Alternative 2 would be slightly reduced as compared to the proposed project.

5.6.2.19 Relationship to Project Objectives and Summary of Impacts

Compared to the project, Alternative 2 would avoid or reduce impacts related to aesthetics, geology, and soils (including paleontological resources), hydrology and water quality, noise, population (both residential and employment), and utilities. As compared to the project, Alternative 2 proposes fewer residential units overall, has a smaller development footprint, and would not develop the resort. Additionally, Alternative 2 would not require the extension of the PDMWD public water main or the widening of West Hills Parkway. As such it would also incrementally reduce impacts related to air quality, biological resources, cultural resources, energy, hazards and hazardous materials, mineral resources, public services, recreation, and wildfire. Alternative 2 would not avoid the significant and unavoidable transportation impacts resulting from the exceedance of the VMT thresholds for both commercial and residential uses.

Alternative 2 would not meet Project Objectives 1 through 6, which deal with providing the resort uses, redesigning the golf course, and the economic benefits associated with those uses. Alternative 2 would partially or to a lesser degree meet Project Objectives 7 through 11 because it would add housing units to the golf course and would also provide the southeastern Project Trail Segment, albeit with a different alignment. The Project Trail Segment would start at the segment of the planned SANDAG trail located at the boundary of Santee and City of San Diego and travel north, ending at the property line with Vista del Verde, instead of weaving westward through the Country Club and Resort and Residential North.

5.6.3 Analysis of Alternative 3 - Reduced Resort Alternative

5.6.3.1 Aesthetics and Visual Resources

As discussed previously in Section 5.5.1.1, the existing visual character of the project site is defined by recreational facilities, including a golf course, hotel, and a country club. The dominant visual components are those typical of

golf courses. In addition, several waterways travel through the project site, including Sycamore Canyon Creek, which crosses under Carlton Oaks Drive and merges with the San Diego River (North Channel).

Under Alternative 3, Residential North and the new Country Club and Resort (and golf course) would not be developed; instead, Residential North would retain the existing clubhouse and hotel. The project would maximize the housing concentration at Residential West by transferring the residential density from Residential North to Residential West, increasing the density at Residential West to approximately 22–30 DU/acre for a total of 242 new units (plus the modification of a driveway at one existing residence).

This means that the less-than-significant impacts related to the introduction of 150 multifamily units and 6 single-family units (and modification to a driveway at one existing single-family unit) at Residential North would not occur. Additionally, the introduction of a new country club resort and the redesign of the golf course into the visual setting, along the eastern portion of the golf course, would not occur. Some trail segments and the associated safety fencing would still be constructed under Alternative 3, so impacts on a scenic vista resulting from construction of trail safety fencing would be similar to the proposed project. Consequently, while the project's impacts are concluded to be less than significant (refer to Section 3.1.5 in Section 3.1), impacts would nevertheless be reduced under this Alternative, compared to the project because no development would occur at Residential North or the resort area.

5.6.3.2 Air Quality and Health Risk

As discussed previously in Section 5.5.1.2, the proposed project would increase both population and employment within the City of Santee. However, as discussed in Section 3.2.3.3, the incremental increase in growth and employment associated with the proposed project would not cause a cumulatively considerable net increase of ozone, PM₁₀, or PM_{2.5} and would be consistent with the Santee General Plan that was provided to develop the SIP and RAQS. While the proposed project would have a significant impact with respect to the exceedance of the County's risk threshold for residential cancer risk during the construction period, this would be mitigated to less than significant through the implementation of **MM-AQ-1**.

Alternative 3 would result in similar impacts as the proposed project related to consistency with the RAQS or SITP because, like the project, it would be consistent with the General Plan and would not exceed the total number of residential units identified in such plans. But like the project, the City of Santee would be required to transmit a revised forecast to SANDAG, followed by updates to the RAQS and SIP.

Impacts associated with criteria air pollutant emissions during construction would be reduced under Alternative 3 compared to the proposed project because the resort facilities and the redesigned golf course would not be constructed. Impacts to sensitive receptors would still apply to Alternative 3, although there is less construction overall with the elimination of Residential North and the Resort. Operational emissions associated with stationary sources (e.g., architectural coatings, consumer products, landscape equipment, and energy use) and associated mobile emissions (vehicle trips) would be similar to the proposed project due to the same number of residential units on the project site but would be slightly decreased because no resort would be constructed.

In addition, similar impacts from toxic air contaminants and operational health impacts on sensitive receptors would occur under this alternative due to similar construction activities and operational land uses but to a slightly lesser extent than the proposed project. Mitigation Measures similar to the project would be required to reduce impacts and cumulative increases in criteria pollutant emissions from construction and operation, similar to the proposed project. Therefore, there would be an incremental reduction in impacts under Alternative 3 as compared to the proposed project.

5.6.3.3 Biological Resources

The proposed project would have multiple significant, but mitigable impacts on biological resources, including the potential to adversely affect special-status wildlife species, disturb nesting birds and native wildlife species, damage sensitive vegetation, and impact wetland areas. All impacts on biological resources would be less than significant after implementation of **MM-BIO-1** through **MM-BIO-18**.

Under Alternative 3, there would still be excavation and construction within areas of the Residential West site that have the potential to adversely affect special-status wildlife species, disturb nesting birds and native wildlife species, damage sensitive vegetation, and impact wetland areas. Potential dust, erosion, and runoff associated with construction activities, which could result in adverse effects on native wildlife species, would still occur; however, potential dust, erosion, and runoff would be reduced due to the reduction in excavation. Consequently, while Alternative 3 would not develop Residential North or the resort area, it would still require the implementation of mitigation in order to reduce significant impacts; it would result in incrementally reduced impacts to biological resources compared to the project simply because of a reduction in the acreage to be excavated.

5.6.3.4 Cultural and Tribal Cultural Resources and Human Remains

In the existing condition, the built environment was determined not to include any historical resources; therefore, neither the proposed project nor Alternative 3 would have an impact on historical resources.

Under the proposed project, all impacts on cultural resources resulting from excavation in areas with potential archaeological resources, human remains, and tribal cultural resources would be less than significant after implementation of **MM-CUL-1** through **MM-CUL-7**.

Under Alternative 3, there would still be excavation and construction within areas of the Residential West site that have the potential to contain archaeological resources because the emergency access road would still be required. Consequently, although Alternative 3 would not implement Residential North or the resort area, it would still require the implementation of mitigation in order to reduce significant impacts. Therefore, it would result in incrementally reduced impacts related to archaeological and tribal cultural resources and inadvertent discovery of human remains compared to the project simply because of a reduction in the acreage to be excavated, resulting in a corresponding reduction in the potential to encounter undiscovered resources.

5.6.3.5 Energy

Project construction would require electricity for use in mobile offices, gasoline, and diesel fuel for transportation of employees and haul trucks to and from the project site, and diesel fuel for operation of off-road equipment, and operation of the proposed project would involve the use of energy resources include employee and visitor vehicle trips, and utility-related consumption (e.g., electricity and natural gas in buildings, water consumption, wastewater, and solid waste generation). These increases during both the construction and operations phases of the project were determined to be incremental increases that would be less than significant (without mitigation). Further, the proposed project was determined not to conflict with a state or local plan for renewable energy or energy efficiency.

Alternative 3 would still propose construction of the same number of residential units (concentrated at Residential West) as the proposed project; however, it would represent an incremental reduction in impacts compared to the proposed project due to the elimination of the expanded resort uses.

5.6.3.6 Geology and Soils

The proposed project, specifically the resort, would have the potential to exacerbate the potential for liquefaction. This condition would require the implementation of **MM-GEO-1** to reduce impacts to less-than-significant levels. The proposed project would not exacerbate the potential of a rupture of a known earthquake fault, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; or exacerbate the potential for impacts associated with expansive soils, and impacts were determined to be less than significant. The proposed project would not result in impacts associated with septic tanks or alternative wastewater disposal systems. However, the project site is also underlain by the Friars formation, which has a high sensitivity for paleontological resources. The proposed project would be required to implement **MM-GEO-2** to reduce impacts to paleontological resources.

Alternative 3 would similarly require ground-disturbing activities associated with excavation in order to implement the 242 units at Residential West. However, because the potential for liquifiable soils exists only at the resort location, there would not be a requirement to implement **MM-GEO-1** under Alternative 3. Therefore, implementation of Alternative 3 represents a reduction in impacts due to the elimination of the building footprints at Residential North and the proposed resort area, as well as the elimination of a need to implement **MM-GEO-1** to preclude potential issues associated with the liquefiable soils present at the proposed resort area. Should Alternative 3 be adopted, the applicant would still need to implement **MM-GEO-2** to reduce impacts associated with paleontological resources.

5.6.3.7 Greenhouse Gas Emissions

As discussed above for Alternative 1, the proposed project would not generate emissions that would either directly or indirectly have a significant impact on the environment, nor would the project conflict with the City of Santee's plans, policies or regulations adopted for the purpose of reducing GHGs. Impacts would be less than significant.

GHG emissions would generally be similar to those of the proposed project because there would be the same number of residential units. Alternative 3 represents a slight reduction in intensity due to the elimination of the resort uses and would therefore represent an incremental reduction in the production of both operational and construction-related GHG emissions as compared to the proposed project. Like the project, Alternative 3 would be required to incorporate the City of Santee's Sustainable Santee Plan Checklist items. Alternative 3 would also be required to meet the City of San Diego's CEQA significance determination thresholds of the Land Development Manual, and the City of San Diego's *CAP Consistency Regulations* (2022b). As such, the proposed project would be consistent with the City of Santee's *Sustainable Santee Plan* (City of Santee 2019) as well the City of San Diego's 2022 CAP (City of San Diego 2022a).

5.6.3.8 Hazards and Hazardous Materials

As discussed previously in Section 5.5.1.8, it was determined that impacts due to routine transport, use, and disposal of hazardous materials during construction and operation of the proposed project would be less than significant. In addition, it was determined that the proposed project could exacerbate an existing safety hazard for people residing or working within the vicinity of the project site; however, this impact would be avoided through compliance with the regulatory requirement to obtain FAA approval and ALUC review and determination for any construction equipment and operational structures proposed to be over 35 feet in height.

Similar to the proposed project, Alternative 3 does not include any construction within the area where the UST was removed and remediated. However, Alternative 3 would introduce new uses or construction equipment into the AIA of two airports: a potential impact that would be avoided through compliance with the regulatory requirement to obtain FAA approval and ALUC review and determination. Therefore, while Alternative 3 is similar to the proposed project in many respects, there would be an incremental reduction in impacts due to the general reduction in the amount of acreage disturbed by grading (no grading at Residential North or the resort area).

5.6.3.9 Hydrology and Water Quality

The proposed project would disturb 118.7 acres of land (Appendix K). Therefore, compliance with the Construction General Permit would require development and implementation of an SWPPP, which would identify which construction BMPs would be implemented in order to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness. In addition to the SWPPP, the project proponents would be required to implement the construction BMPs identified in the City of Santee's JRMP and the City of San Diego's JRMP. Due to existing regulations and both cities' water quality programs, the proposed project would not result in any significant water quality impacts. However, the proposed golf course would reshape the existing ponds on the golf course and grading for portions of the residential development areas would occur within the floodplain limits. Additionally, a small portion of the northern residential development encroaches into the floodway. The proposed grading for the clubhouse, resort, and the golf course would occur within the regulatory floodway. Therefore, **MM-HYD-1** would be required to ensure hydrology and flooding impacts are reduced to less than significant.

In contrast, under Alternative 3, grading and construction at two of the three planning areas (Residential North and resort area) would be eliminated. Therefore, while Alternative 3 would still need to implement **MM-HYD-1**, there would be a reduction in hydrology and flooding impacts due to the overall reduction in grading and the fact that there would be no resort-associated grading within the floodway.

5.6.3.10 Land Use and Planning

The proposed project would not involve features, such as the construction of major new roads or demolition of existing roads, which would divide the established neighborhoods in the surrounding area. Therefore, impacts related to division of an established community would be less than significant. In addition, based on the land use consistency table (Table 3.10-1), the proposed project would largely be consistent with the land use plans and policies adopted for the purposes of mitigating or avoiding an environmental impact, and impacts would be less than significant.

Similarly, Alternative 3 would not involve features, such as the construction of major new roads or demolition of existing roads, which would divide the established neighborhoods in the surrounding area. and it would also largely be consistent with the land use plans and policies adopted for the purposes of mitigating or avoiding an environmental impact and impacts would be less than significant. Therefore, Alternative 3 would have similar impacts as compared to the proposed project.

5.6.3.11 Mineral Resources

The project site is underlain primarily by MRZ-2 (areas of known resources), with small areas of MRZ-3. Although there is the potential of mineral recovery from the MRZ-2 and MRZ-3 areas on the project site, in accordance with the Santee General Plan Conservation Element, economic, land use compatibility, and environmental protection factors must be considered when deciding on the appropriateness of mining in a particular area, the Santee General

Plan designates the project site for Planned Development, not mineral resources extraction. Furthermore, consistent with the Santee General Plan Conservation Element's Objective 10.0, approximately 38% of the project site would remain undeveloped as open space and golf course uses, and the mineral resources like aggregate and sediment in the open space would not be lost to the region. Impacts were determined to be less than significant.

Similarly, Alternative 3 would develop portions of the project site, which would preclude the extraction of mineral resources, but the remainder of the golf course would be available for aggregate mining (subject to compatibility factors). Although impacts of both the proposed project and Alternative 3 would be less than significant, impacts for the latter would be incrementally reduced as compared to the proposed project because there would be no permanent structures within the proposed resort area.

5.6.3.12 Noise and Vibration

Implementation of the proposed project would not create noise impacts as long as all construction activity occurs within both cities' permitted days and hours, and if noticing is provided to all property owners and residents within 300 feet of the project site at least 10 days before the start of construction. Significant impacts would also occur at existing residences due to noise from on-site mechanical equipment at the hotel and clubhouse, at existing residences due to noise from the on-site sewer lift station, and at proposed new residences due to future traffic noise. Regulatory Compliance Measure (**RCM-NOI-1** through **RCM-NOI-4**) would be required to reduce construction noise. **MM-NOI-1** would ensure that proposed residential development complies with City of Santee's *General Plan – Noise Element* development standards related to future noise exposure. **MM-NOI-2** would be required for traffic noise impacts at proposed on-site residences. Lastly, **MM-NOI-3** would ensure that the project does not generate excessive noise levels from music at the proposed hotel and clubhouse, and **MM-NOI-4** would ensure no impacts from vibration would occur.

In contrast, Alternative 3 would entirely eliminate impacts related to noise and vibration identified at Residential North and the proposed resort area because there is no construction proposed at those locations, which eliminates the possibility of construction, mechanical, traffic, and sewer lift station-related impacts as at those locations as well as groundborne vibration. Therefore, while mitigation would still be required (with the exception of **MM-NOI-2**), Alternative 3 would result in reduced noise and vibration impacts compared to the proposed project due to the elimination of Residential North and the proposed resort area.

5.6.3.13 Population and Employment

As discussed in Section 5.5.1.13, implementation of the proposed project would not result in substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure). As such, project impacts related to population, housing, and employment growth would be less than significant.

Under Alternative 3, residential units would be constructed at Residential West, but Residential North and the proposed resort area would remain in their existing condition. The overall number of units implemented under Alternative 3 would be the same as for the proposed project, but the density at Residential West would be increased to 27.82 DU/acre. Therefore, impacts under Alternative 3 would be similar to those of the proposed project, although both are less than significant with no mitigation required.

5.6.3.14 Public Services

The proposed project would operate as residential neighborhoods, a golf course, a clubhouse and resort, and complementary retail. In addition to guest rooms, the hotel would provide space for special events such as golf tournaments, weddings, banquets, and conferences. As discussed in Section 5.5.1.14, implementation of the proposed project would not result in the need for new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services, nor would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered schools or libraries. Impacts would be less than significant.

Alternative 3 would include the same overall number of residential units as the proposed project, and the existing resort would employ approximately the same number of people as the proposed project. Therefore, impacts to public services for this alternative would be similar to those of the proposed project.

5.6.3.15 Recreation

The proposed project would operate as a mixed-use recreation-related country club resort with a number of recreational facilities, including residential neighborhoods, a golf course, a pool, parks, trails, and other recreational amenities. Therefore, as discussed in Section 5.5.1.15, implementation of the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

The proposed project would not have significant impacts, and Alternative 3 would include the same overall number of residential units as the proposed project. Alternative 3 and the resort would continue to provide recreational amenities. Therefore, it is expected that implementation of Alternative 3 would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

5.6.3.16 Transportation and Circulation

As discussed previously in Section 5.5.1.16, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. In addition, the proposed project would have a less-than-significant impact related to increased hazards due to a geometric design feature or incompatible uses.

As shown in **Error! Reference source not found.**, the proposed project's residential uses are anticipated to generate a VMT/Capita of 22.8 miles/person, which is 5.1 miles (22.4%) over the City of Santee's significance threshold (17.7 miles/person) and the City of San Diego's threshold (16.1 miles/person). Also shown in Table 3.16-4, the proposed project's commercial uses are anticipated to generate a VMT/Employee of 19.3 miles, which is 3.2 miles/employee (16.6%) over the City of Santee and the City of San Diego's threshold (16.1 miles/employee). Impacts would be potentially significant and **MM-TRA-1** would be required. However, there is no mitigation feasible which would mitigate VMT-related impacts to less than significant. This is due to the fact that the project site is located in a VMT-inefficient area, and the only way to reduce VMT impacts to less than significant would be to propose a project in another location. Therefore, VMT-related impacts would remain significant and unavoidable even with implementation of **MM-TRA-1**, which would implement TDM measures which would reduce commercial and residential VMT by 3.1% and 2.0%, respectively.

Alternative 3 would not develop Residential North or the proposed resort area but would still implement the same overall total number of units as compared to the proposed project. Nevertheless, being located in the same VMT-inefficient location as the proposed project, Alternative 3 would suffer from the same circumstances which cause the proposed project to have significant and unavoidable VMT-related impacts. As such, impacts of Alternative 3 would be similar to those of the proposed project.

5.6.3.17 Utilities and Service Systems

In order to meet the demands of the proposed project, new and expanded infrastructure and facilities (i.e., water, wastewater treatment, stormwater drainage, electric power, natural gas, telecommunications facilities, and solid waste removal) would be required to accommodate the additional development, the construction of which could result in physical impacts on the environment related to air quality, biological resources, cultural and tribal cultural resources, geology, soils, paleontological resources, and noise. Impacts would be potentially significant, requiring implementation of mitigation measures detailed in Section 3.2, Section 3.3, Section 3.4, Section 3.6, and Section 3.12. As described in these EIR sections, all impacts would be reduced to less than significant with the implementation of mitigation.

Alternative 3 would not develop Residential North or the proposed resort area but would result in the same overall total number of residential units as compared to the proposed project. However, while the proposed project's impacts would be mitigated, Alternative 3's impact on utilities and service systems would be incrementally reduced compared to the project because of the fact that the resort uses proposed would not be implemented under Alternative 3.

5.6.3.18 Wildfire

During construction, temporary lane closures and construction-related traffic within the project site could delay or obstruct the movement of emergency vehicles, which is considered to be a potentially significant impact. Compliance with the City of Santee and City of San Diego regulations, the measures established by the OA EOP and MJHMP, and the requirements of the traffic control plan, would reduce potential impacts associated with interference with applicable emergency response plans to less than significant.

During the operations phase, the proposed project would implement the FPP (Appendix R1) that has been prepared to provide fire planning guidance and requirements for reducing fire risk and demand for fire protection services. Site access would comply with the requirements of the California Fire Code and City of Santee Municipal Code. Under Alternative 3, because no residential uses would be introduced at the Residential North site and a new Country Club and Resort would not be built in PA-3, there would not be a need for an emergency access road through the Vista del Verde site. Given the flat characteristics of the project site and the proposed improvements, post-fire conditions would not be expected to increase risks associated with slope failures, mudflows, or landslides. Therefore, operation of the proposed project would not significantly impair an adopted response plan or emergency evacuation plan, and impacts would be less than significant.

Alternative 3 would introduce the same number of people to the site as the project, and consequently there would be no increase in the risk of wildfires because of the requirements listed in PDF-11, Fire Protection Measures, and other requirements set forth in the FPP such as the homes being required to build consistent with the most updated Fire Code requirements. In addition, this alternative like the project would include ignition-resistant development, effective FMZs including management and maintenance, and fire-safe features to limit project occupant exposure and prevent exacerbated wildfire risk. Similar to the proposed project, this alternative would require the installation

or maintenance of associated infrastructure (such as streets, fuel breaks, emergency water sources, power lines, or other utilities) such that it would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. As such, Alternative 3's impact with respect to wildfire would be similar as compared to the proposed project.

5.6.3.19 Relationship to Project Objectives and Summary of Impacts

Compared to the project, Alternative 3 would avoid or reduce impacts related to aesthetics, geology, and soils (including paleontological resources), hydrology and water quality, and noise. As compared to the project, Alternative 3 proposes the same overall total number of residential units as the proposed project. However, it has a smaller development footprint because it would not introduce any new development at Residential North and would not develop a new resort. As such it would incrementally reduce impacts related to air quality, biological resources, cultural resources, energy, hazards and hazardous materials, mineral resources, population (employment), public services, utilities, and wildfire. Alternative 3 would not avoid the significant and unavoidable transportation impacts resulting from the exceedance of the VMT thresholds for both commercial and residential uses as well as the associated VMT-related GHG impact.

Similar to Alternative 2, Alternative 3 would not meet Project Objectives 1 through 6 which deal with providing the resort uses, redesigning the golf course, and the economic benefits associated with those uses. Alternative 3 would partially or to a lesser degree meet Project Objectives 7 through 11 because it would add housing units to the golf course and would also provide the southeastern Project Trail Segment, albeit with a different alignment. The Project Trail Segment would start at the existing Santee trail and travel north, ending at the property line with Vista del Verde, instead of weaving westward through the Country Club and Resort and Residential North.

5.6.4 Analysis of Alternative 4 - Reduced Footprint Project Alternative

5.6.4.1 Aesthetics and Visual Resources

As discussed previously in Section 5.5.1.1, the existing visual character of the project site is defined by recreational facilities, including a golf course, hotel, and a country club. The dominant visual components are those typical of golf courses. In addition, several waterways travel through the project site, including Sycamore Canyon Creek, which crosses under Carlton Oaks Drive and merges with the San Diego River (North Channel).

Under Alternative 4, both Residential West and Residential North would be developed; however, the number of units that could be accommodated at Residential North would be reduced due to the need to eliminate impacts to biological resources. This means that density at Residential West would increase to approximately 11 DU/acre (107 units) and the product type would switch to a multifamily clustered style unit with shared driveways and small yards. Consequently, the impacts at the Residential West site would be incrementally increased as compared to the proposed project which would only introduce 86 two-story homes into the views of the golf course from the homes to the north. Unlike Alternatives 2 and 3, the introduction of a new Country Club and Resort into the visual setting, along the eastern portion of the golf course, would still occur. Consequently, while the project's impacts are concluded to be less than significant (refer to Section 3.1.5 in Section 3.1), impacts would nevertheless be slightly increased under Alternative 4 as compared to the project because development at Residential West would be intensified.

5.6.4.2 Air Quality and Health Risk

As discussed previously in Section 5.5.1.2, the proposed project would increase both population and employment within the City of Santee. However, as discussed in Section 3.2.3.3, the incremental increase in growth and employment associated with the proposed project would not cause a cumulatively considerable net increase of ozone, PM₁₀, or PM_{2.5}, and further would not be inconsistent with the Santee General Plan that was provided to develop the with the estimates that were used to develop the SIP and RAQS. In addition, the proposed project would have a significant issue with respect to sensitive receptors due to the exceedance of the County's risk threshold for residential cancer risk during the construction period. This would be a significant impact for the proposed project that would be mitigated to less than significant through the implementation of **MM-AQ-1**.

Although the configuration differs slightly, Alternative 4 would have the same uses and same total number of units as the proposed project. Alternative 4 would result in similar impacts as the proposed project related to consistency with the RAQS or SITP because, like the project, it would be consistent with the General Plan and would not exceed the total number of residential units identified in such plans. But like the project, the City of San Diego would be required to transmit a revised forecast to SANDAG, followed by updates to the RAQS and SIP. Operational emissions associated with stationary sources (e.g., architectural coatings, consumer products, landscape equipment, and energy use) and associated mobile emissions (vehicle trips) would be the same as the proposed project due to the same number of residential units on the project site the construction of the resort. In addition, similar impacts from toxic air contaminants and operational health impacts on sensitive receptors would occur under this alternative due to similar construction activities and operational land uses. Therefore, these impacts would be similar for Alternative 4 as compared to the proposed project, although less than significant for both. Impacts to sensitive receptors would also apply to Alternative 4 because of the similarity in land uses and density as compared to the proposed project. Implementation of **MM-AQ-1** would still be required under Alternative 4.

5.6.4.3 Biological Resources

The proposed project would have multiple significant, but mitigable impacts on biological resources, including the potential to adversely affect special-status wildlife species, disturb nesting birds and native wildlife species, damage sensitive vegetation, and impact wetland areas. All impacts on biological resources would be less than significant after implementation of **MM-BIO-1** through **MM-BIO-18**.

Under Alternative 4, there would still be excavation and construction within areas that have the potential to indirectly adversely affect special-status wildlife species, disturb nesting birds and native wildlife species, damage sensitive vegetation, and impact wetland areas. Potential dust, erosion, and runoff associated with construction activities, which could result in adverse effects on native wildlife species, would still occur. Alternative 4 would still require the implementation of mitigation in order to reduce significant impacts, as Alternative 4 would result a similar amount of density and intensity as the proposed project. However, impacts would be incrementally reduced because the footprints at Residential North and the resort area would be reduced in order to avoid the most sensitive biological resources. Therefore, impacts associated with Alternative 4 would be slightly reduced in terms of biological resources.

5.6.4.4 Cultural and Tribal Cultural Resources and Human Remains

In the existing condition, the built environment was determined not to include any historical resources; therefore, neither the proposed project nor Alternative 4 would have an impact on historical resources.

Under the proposed project, all impacts on cultural resources resulting from excavation in areas with potential archaeological resources, human remains, and tribal cultural resources would be less than significant after implementation of **MM-CUL-1** through **MM-CUL-7**. Similar to Alternative 3, there would still be excavation and construction within areas of the Residential West site that have the potential to contain archaeological resources because the emergency access roads and utility maintenance roads would still be required. Consequently, Alternative 4 would still require the implementation of mitigation in order to reduce significant impacts, and impacts would be similar to those of the proposed project.

5.6.4.5 Energy

Project construction would require electricity for use in mobile offices, gasoline and diesel fuel for transportation of employees and haul trucks to and from the project site, and diesel fuel for operation of off-road equipment, and operation of the proposed project would involve the use of energy resources include employee and visitor vehicle trips, and utility-related consumption (e.g., electricity and natural gas in buildings, water consumption, wastewater and solid waste generation). These increases during both the construction and operations phases of the project were determined to be incremental increases that would be less than significant (without mitigation). Further, the proposed project was determined not to conflict with a state or local plan for renewable energy or energy efficiency.

Alternative 4 would still propose construction of the same number of residential units as the proposed project (although in a different configuration) and would also build the proposed resort facilities (except without the hotel). Therefore, the overall energy demand at the site would be similar for Alternative 4 as compared to the proposed project.

5.6.4.6 Geology and Soils

The proposed project, specifically the resort, would have the potential to exacerbate the potential for liquefaction. This condition would require implementation of **MM-GEO-1** to reduce impacts to less-than-significant levels. The proposed project would not exacerbate the potential of a rupture of a known earthquake fault, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; or exacerbate the potential for impacts associated with expansive soils, and impacts were determined to be less than significant. The proposed project would not result in impacts associated with septic tanks or alternative wastewater disposal systems. However, the project site is also underlain by the Friars formation, which has a high sensitivity for paleontological resources. The proposed project would be required to implement **MM-GEO-2** to reduce impacts to paleontological resources.

Alternative 4 would have slightly smaller footprints at Residential West and the Resort but would still require ground-disturbing activities associated with excavation in order to implement the 107 units at Residential West, the 135 units at Residential North, as well as the resort uses. Therefore, implementation of Alternative 4 would be very similar to the proposed project. Both would need to implement **MM-GEO-1** to preclude potential issues associated with the liquefiable soils present at the proposed resort area. Should Alternative 4 be adopted, the applicant would still need to implement **MM-GEO-2** to reduce impacts associated with paleontological resources.

5.6.4.7 Greenhouse Gas Emissions

As discussed above for Alternative 1, the proposed project would not generate emissions that would either directly or indirectly have a significant impact on the environment, nor would the project conflict with the City of Santee or

the City of San Diego's plans, policies or regulations adopted for the purpose of reducing GHGs. Impacts would be less than significant.

GHG emissions would generally be similar to those of the proposed project because there would be the same number of residential units, and overall intensity of uses, although slightly reconfigured to avoid biological impacts. Impacts both operational and construction-related would be less than significant with the application of the relevant PDFs (see Chapter 2). Like the project, Alternative 4 would be required to incorporate the City of Santee's Sustainable Santee Plan Checklist items. Alternative 4 would also be required to meet the City of San Diego's CEQA significance determination thresholds of the Land Development Manual, and the City of San Diego's *CAP Consistency Regulations* (2022b). As such, the proposed project would be consistent with the City of Santee's *Sustainable Santee Plan* (City of Santee 2019) as well the City of San Diego's 2022 CAP (City of San Diego 2022a).

5.6.4.8 Hazards and Hazardous Materials

As discussed previously in Section 5.5.1.8, it was determined that impacts due to routine transport, use, and disposal of hazardous materials during construction and operation of the proposed project would be less than significant. In addition, it was determined that the proposed project could exacerbate an existing safety hazard for people residing or working within the vicinity of the project site; however, this potential impact can be avoided with the regulatory requirement to obtain FAA approval and ALUC review and determination for any construction equipment and operational structures proposed to be over 35 feet in height.

Similar to the proposed project, Alternative 4 does not include any construction within the area where the UST was removed and remediated. However, Alternative 4 would introduce new uses or construction equipment into the AIA of two airports, and Alternative 4 would be required to obtain FAA approval and ALUC review and determination. Therefore, Alternative 4 would be similar to the proposed project in terms of potential hazards.

5.6.4.9 Hydrology and Water Quality

The proposed project would disturb 118.7 acres of land (Appendix K). Therefore, compliance with the Construction General Permit would require development and implementation of an SWPPP, which would identify which construction BMPs would be implemented in order to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness. In addition to the SWPPP, the project proponents would be required to implement the construction BMPs identified in the City of Santee's JRMP and the City of San Diego's JRMP. Due to existing regulations and both cities' water quality programs, the proposed project would not result in any significant water quality impacts. However, the proposed golf course would reshape the existing ponds on the golf course and grading for portions of the residential development areas would occur within the floodplain limits. Additionally, a small portion of the northern residential development encroaches into the floodway. The proposed grading for the clubhouse, resort, and the golf course would occur within the regulatory floodway. Therefore, **MM-HYD-1** would be required to ensure hydrology and flooding impacts are reduced to less than significant.

Alternative 4 would still construct the proposed Country Club and Resort which means that Alternative 4 would still need to implement **MM-HYD-1** due to grading impacts in the floodway. Therefore, impacts associated with Alternative 4 would be similar to those of the proposed project.

5.6.4.10 Land Use and Planning

The proposed project would not involve features, such as the construction of major new roads or demolition of existing roads, which would divide the established neighborhoods in the surrounding area. Therefore, impacts related to division of an established community would be less than significant. In addition, based on the land use consistency table (Table 3.10-1), the proposed project would largely be consistent with the land use plans and policies adopted for the purposes of mitigating or avoiding an environmental impact, and impacts would be less than significant.

Similarly, Alternative 4 would not involve features, such as the construction of major new roads or demolition of existing roads, which would divide the established neighborhoods in the surrounding area, and it would also largely be consistent with the land use plans and policies adopted for the purposes of mitigating or avoiding an environmental impact, and impacts would be less than significant. Therefore, Alternative 4 would have similar impacts as compared to the proposed project.

5.6.4.11 Mineral Resources

The project site is underlain primarily by MRZ-2 (areas of known resources), with small areas of MRZ-3. Although there is the potential of mineral recovery from the MRZ-2 and MRZ-3 areas on the project site, in accordance with the Santee General Plan Conservation Element, economic, land use compatibility, and environmental protection factors must be considered when deciding on the appropriateness of mining in a particular area, the Santee General Plan designates the project site for Planned Development, not mineral resources extraction. Furthermore, consistent with the City of Santee's *General Plan – Conservation Element's* Objective 10.0, approximately 61.5% of the project site would remain undeveloped as open space and golf course uses, and the mineral resources like aggregate and sediment in the open space would not be lost to the region. Impacts were determined to be less than significant.

Similarly, Alternative 4 would develop portions of the project site, which would preclude the extraction of mineral resources, but the remainder of the golf course would be available for aggregate mining (subject to compatibility factors). Impacts would be similar to those of the proposed project, and they would be less than significant for both.

5.6.4.12 Noise and Vibration

Implementation of the proposed project would not create noise impacts as long as all construction activity occurs within both cities' permitted days and hours, and if noticing is provided to all property owners and residents within 300 feet of the project site at least 10 days before the start of construction. Significant impacts would also occur at existing residences due to noise from on-site mechanical equipment at the hotel and clubhouse, at existing residences due to noise from the on-site sewer lift station, and at proposed new residences due to future traffic noise. Regulatory Compliance Measure (**RCM-NOI-1** through **RCM-NOI-4**) would be required to reduce construction noise. **MM-NOI-1** would ensure that proposed residential development complies with City of Santee's *General Plan – Noise Element* development standards related to future noise exposure. **MM-NOI-2** would be required for traffic noise impacts at proposed on-site residences. Lastly, **MM-NOI-3** would ensure that the project does not generate excessive noise levels from music at the proposed hotel and clubhouse, and **MM-NOI-4** would ensure no impacts from vibration would occur.

Although Alternative 4 would reduce the footprints of Residential North and the Resort area, there would still be development at all three planning areas. Therefore, impacts would be similar to those of the proposed project and mitigation would still be required for both.

5.6.4.13 Population and Employment

As discussed in Section 5.5.1.13, implementation of the proposed project would not result in substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure). As such, project impacts related to population, housing, and employment growth would be less than significant.

Under Alternative 4, residential units would be slightly reduced at Residential North and slightly increased at Residential West. However, the overall number of units for the project site would be similar to what would occur under the proposed project. Therefore, potential impacts associated with substantial unplanned population growth in an area would be less than significant and no mitigation would be required, and overall impacts associated with population and employment would be similar to those of the proposed project.

5.6.4.14 Public Services

The proposed project would operate as a golf course, a clubhouse and resort, complementary retail, and residential neighborhoods. In addition to guest rooms, the hotel would provide space for special events such as golf tournaments, weddings, banquets, and conferences. As discussed in Section 5.5.1.14, implementation of the proposed project would not result in the need for new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Nor would implementation of the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered schools or libraries. Impacts would be less than significant.

The proposed project would not have significant impacts, and Alternative 4 would result in a similar amount of density and intensity as the proposed project. Therefore, Alternative 4 would be similar to the proposed project with respect to potential impacts associated with the provision of public services.

5.6.4.15 Recreation

The proposed project would operate as a mixed-use recreation-related country club resort residential neighborhoods with a number of recreational facilities including a golf course, pool, parks, trails, and other recreational amenities. Therefore, as discussed in Section 5.5.1.15, implementation of the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

Alternative 4 would have the same overall density and intensity of uses (although slightly reconfigured) as the proposed project. Therefore, impacts would be similar for both Alternative 4 and the proposed project, although they would be less than significant for both.

5.6.4.16 Transportation and Circulation

As discussed previously in Section 5.5.1.16, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. In addition, the proposed project would have a less-than-significant impact related to increased hazards due to a geometric design feature or incompatible uses.

As shown in **Error! Reference source not found.**, the proposed project's residential uses are anticipated to generate a VMT/Capita of 22.8 miles/person, which is 5.1 miles (22.4%) over the City of Santee's significance threshold (17.7 miles/person) and the City of San Diego's threshold (16.1 miles/person). Also shown in Table 3.16-4, the proposed project's commercial uses are anticipated to generate a VMT/Employee of 19.3 miles, which is 3.2 miles/employee (16.6%) over the City of Santee and the City of San Diego's threshold (16.1 miles/employee). Impacts would be potentially significant and **MM-TRA-1** would be required. However, there is no mitigation feasible which would mitigate VMT-related impacts to less than significant. This is due to the fact that the project site is located in a VMT-inefficient area, and the only way to reduce VMT impacts to less than significant would be to propose a project in another location. Therefore, VMT-related impacts would remain significant and unavoidable even with implementation of **MM-TRA-1**, which would implement TDM measures which would reduce commercial and residential VMT by 3.1% and 2.0%, respectively.

Alternative 4 would develop the same resort uses and the same number of residential units as compared to the proposed project albeit within a smaller footprint and with some reductions in improvements to the golf course. Therefore, being located in the same VMT-inefficient location as the proposed project, Alternative 4 would suffer from the same circumstances which cause the proposed project to have significant and unavoidable VMT-related impacts. As such, impacts of Alternative 4 would be similar to those of the proposed project.

5.6.4.17 Utilities and Service Systems

In order to meet the demands of the proposed project, new and expanded infrastructure and facilities (i.e., water, wastewater treatment, stormwater drainage, electric power, natural gas, telecommunications facilities, and solid waste removal) would be required to accommodate the additional development, the construction of which could result in physical impacts on the environment related to air quality, biological resources, cultural and tribal cultural resources, geology, soils, paleontological resources, and noise. Impacts would be potentially significant, requiring implementation of mitigation measures detailed in Section 3.2, Section 3.3, Section 3.4, Section 3.6, and Section 3.12. As described in these EIR sections, all impacts would be reduced to less than significant with the implementation of mitigation.

Alternative 4 would result in the same overall number of residential units as compared to the proposed project and the proposed resort facilities would be built. As such, impacts to water, wastewater treatment, stormwater drainage, electric power, natural gas, telecommunications facilities, and solid waste removal services associated with Alternative 4 would be similar to those of the proposed project, although they would be mitigated for both.

5.6.4.18 Wildfire

During construction, temporary lane closures and construction-related traffic within the project site could delay or obstruct the movement of emergency vehicles, which is considered to be a potentially significant impact. Compliance with the City of Santee and City of San Diego regulations, the measures established by the OA EOP and MJHMP, and the requirements of the traffic control plan, would reduce potential impacts associated with interference with applicable emergency response plans to less than significant.

During the operations phase, the proposed project would implement the FPP (Appendix R1) that has been prepared to provide fire planning guidance and requirements for reducing fire risk and demand for fire protection services. Site access would comply with the requirements of the California Fire Code and City of Santee Municipal Code. Given the flat characteristics of the project site and the proposed improvements, post-fire conditions would not be expected to increase risks associated with slope failures, mudflows, or landslides. Therefore, operation of the proposed project would not significantly impair an adopted response plan or emergency evacuation plan, and impacts would be less than significant.

Alternative 4 would introduce the same number of people to the site as the project, and consequently there would be no increase in the risk of wildfires because of the requirements listed in PDF-11, Fire Protection Measures, and other requirements set forth in the FPP such as the homes being required to build consistent with the most updated Fire Code requirements. In addition, this alternative like the project would include ignition-resistant development, effective FMZs including management and maintenance, and fire-safe features to limit project occupant exposure and prevent exacerbated wildfire risk. Similar to the proposed project, this alternative would require the installation or maintenance of associated infrastructure (such as streets, fuel breaks, emergency water sources, power lines, or other utilities) such that it would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. As such, Alternative 4's impact with respect to wildfire would be similar as compared to the proposed project.

5.6.4.19 Relationship to Project Objectives and Summary of Impacts

Alternative 4 would not only construct the same overall total number of residential units as the proposed project, but (unlike Alternatives 2 and 3) would construct a new resort (minus the hotel). Therefore, impacts would be similar to the proposed project for the following issues: aesthetics, air quality, cultural resources, energy, geology, and soils (including paleontological resources), GHG, hazards and hazardous materials, land use, minerals, noise, population, public services, recreation, transportation, utilities, and wildfire. Alternative 4 would have smaller development footprints (as compared to the proposed project) at Residential North and the Resort area so there would be an incremental reduction in impacts associated with the following: biological resources, and hydrology and water quality. Alternative 4 would not avoid the significant and unavoidable transportation impacts resulting from the exceedance of the VMT thresholds for both commercial and residential uses as well as the associated VMT-related GHG impact.

Alternative 4 would meet or partially meet/lesser degree, Project Objectives 1 through 4, 7, and 10 because it would still develop a mixed-use recreational resort with a new country club and related amenities, would have most of the same economic benefits and employment opportunities as the project while also still providing residential uses and trail connections similar to the proposed project. Due to the avoidance of most biological impacts, the golf course would have a different configuration with some of the fairways reduced and the overall length of the course being shortened slightly. Residential West would also have a different configuration, and the density would be increased to 11 DU/acre. Lastly, while most of the Resort uses would still be constructed within a (smaller) Planning Area 3, the hotel would not be included within this Alternative. Therefore, Alternative 4 would meet to a lesser degree Project Objectives 5, 6, 9, and 11, which deal with employment opportunities and economic benefits, and would not meet Project Objective 8 because the only way to accommodate the lost housing units due to the smaller footprints would be to transition to a denser product type.

5.6.5 Environmentally Superior Alternative

Pursuant to CEQA, an EIR is required to identify the environmentally superior alternative. Although the No Project Alternative (Alternative 1) reduces the greatest number of significant impacts, CEQA requires that when the environmentally superior alternative is the No Project Alternative, another alternative should be identified. Although all of the alternatives would reduce at least one impact as compared to the project, Alternative 2 would reduce impacts to a greater extent than the other alternatives for the issues of air quality and health risk, cultural and tribal cultural resources, energy, population and housing, public services, recreation, utilities, and wildfire. These reduced impacts occur due to the fact that Alternative 2 would develop just 72 units total, instead of 242 units, would not develop Residential West, would not develop the resort, and would not require the private utility maintenance road between Residential West and Residential North. Additionally, Alternative 2 would not require the extension of the PDMWD public water main or the widening of West Hills Parkway, nor would it require the construction of the West Hills Parkway trail bench/connection or the eastern EVA connection via Vista del Verde. As such, Alternative 2 would be the environmentally superior alternative.

Table 5-2. Summary Impact Comparison of the Project and the Alternatives

Environmental Resource	Project Determination	No Project Alternative (Alternative 1)	Reduced Project Alternative (Alternative 2)	Reduced Resort Alternative (Alternative 3)	Reduced Footprint Alternative (Alternative 4)
Aesthetics and Visual Resources	Less than Significant	Reduced	Reduced	Reduced	Increased
Air Quality and Health Risk	Less than Significant with Mitigation	Reduced	Reduced	Slightly Reduced	Similar
Biological Resources	Less than Significant with Mitigation	Reduced	Slightly Reduced	Slightly Reduced	Slightly Reduced
Cultural Resources and Tribal Cultural Resources, and Human Remains	Less than Significant with Mitigation	Reduced	Reduced	Slightly Reduced	Similar
Energy	Less than Significant	Reduced	Reduced	Slightly Reduced	Similar
Geology and Soils and Paleontological Resources	Less than Significant with Mitigation	Reduced	Reduced	Reduced	Similar
Greenhouse Gas Emissions	Less than Significant	Reduced	Slightly Reduced	Slightly Reduced	Similar
Hazards and Hazardous Materials	Less than Significant	Slightly Reduced	Slightly Reduced	Slightly Reduced	Similar
Hydrology and Water Quality	Less than Significant with Mitigation	Slightly Reduced	Reduced	Reduced	Similar
Land Use and Planning	Less than Significant	Similar	Similar	Similar	Similar
Mineral Resources	Less than Significant	Reduced	Slightly Reduced	Slightly Reduced	Similar
Noise and Vibration	Less than Significant with Mitigation	Reduced	Reduced	Reduced	Similar
Population and Employment	Less than Significant	Reduced	Reduced	Slightly Reduced	Similar
Public Services	Less than Significant	Reduced	Reduced	Slightly Reduced	Similar
Recreation	Less than Significant	Reduced	Reduced	Similar	Similar
Transportation, Circulation, and Parking	Significant and Unavoidable	Reduced	Similar	Similar	Similar
Utilities and Service Systems	Less than Significant with Mitigation	Reduced	Reduced	Slightly Reduced	Similar
Wildfire	Less than Significant with Mitigation	Reduced	Reduced	Slightly Reduced	Similar

Table 5-3. Summary Project Objective Comparison of Proposed Project Alternatives

Project Objective	No Project Alternative (Alternative 1)	Reduced Project Alternative (Alternative 2)	Reduced Resort Alternative (Alternative 3)	Reduced Footprint Alternative (Alternative 4)
1 Provide a high-quality, mixed-use recreational resort that will enhance the experience of its users by integrating the country club and related amenities with the golf course and open-space areas to provide a resort-like setting for the facilities and offer views of the golf course from the facilities.	No	No	No	Partially/ Lesser Degree
2 Develop a mixed-use, recreation-related country club resort consistently with the principles of the City of Santee General Plan (1984) that offers a high-quality resort setting and recreation-related amenities and uses that are consistent with other high-quality resorts in the region.	No	No	No	Partially/ Lesser Degree
3 Provide a golf course with a professionally designed layout that can be utilized by a broad range of players, enhance the golfers' experiences, and meet the needs of the broader tourism market.	No	No	No	Partially/ Lesser Degree
4 Provide a golf course that has improved drainage flows, reduced accumulation of surface water on the site, requires less water usage, and avoids environmentally sensitive areas, when feasible.	No	No	No	Yes
5 Provide additional economic revenue for the City of Santee and County of San Diego through the generation of sales, transient occupancy, and property taxes by expanding the event facilities, adding residential units, and upgrading the hotel units.	No	No	No	Partially/ Lesser Degree
6 Invigorate the local economy by providing additional employment and business opportunities associated with operation of the proposed project.	No	No	No	No
7 Provide high-quality housing opportunities that help satisfy regional housing needs.	No	Partially	Partially	Yes
8 Locate the residential uses in a manner that will serve as a transition from the adjacent residential neighborhoods and surrounding areas by providing comparable housing products.	No	Partially/ Lesser Degree	Partially	No

Table 5-3. Summary Project Objective Comparison of Proposed Project Alternatives

Project Objective	No Project Alternative (Alternative 1)	Reduced Project Alternative (Alternative 2)	Reduced Resort Alternative (Alternative 3)	Reduced Footprint Alternative (Alternative 4)
9 Foster future economic sustainability of the Carlton Oaks Country Club and Resort by providing residential accessory uses that will result in a diversification of its customers and enhance membership opportunities to activate the facilities and the site year-round.	No	Partially	Partially	Partially/ Lesser Degree
10 Design a development that is compatible with the San Diego River and includes links to existing and planned trails to the east and west of the project site.	No	Partially	Partially	Yes
11 Provide a mixed-use recreational facility that will provide similar lifestyle experiences (i.e., residential units) as other high-quality resorts in the region.	No	Partially	Partially	Partially/ Lesser Degree

5.7 References

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