FINAL

Second Recirculated Sections of Final Revised Environmental Impact Report

Fanita Ranch Project

May 2025 SCH No. 2005061118

Harris & Associates

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CITY OF SANTEE, CALIFORNIA
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SCH No. 2005061118

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Prepared for:

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Introduction to Volume V

Volume V of the Final Revised Environmental Impact Report (EIR) for the Fanita Ranch Project (proposed project) is organized into three chapters.

Chapter 1, Responses to Comments, includes the introduction to responses to comments, the thematic responses, the responses to comments, and the responses to comments attachments. The thematic responses were prepared for topics frequently commented on during the 45-day public review period. The responses to comments include the comment letters received during the public review period, along with the City's responses to each comment. The comments are reproduced with the responses in a side-by-side format. Numbered brackets identify each specific comment and its corresponding response.

Chapter 2, Errata – Revisions or Clarifications to the Second Recirculated Sections of the Final Revised EIR and Technical Appendices, includes the errata, which summarizes revisions or clarifications to the Second Recirculated Sections and technical appendices.

Chapter 3, Second Recirculated Sections of the Final Revised EIR and Technical Appendices, includes the Second Recirculated Sections of the Final Revised EIR and technical appendices.

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Chapter 1 Responses to Comments

1.1 Response to Comments Introduction

During the public review period (February 24 to April 10, 2025) for the Second Recirculated Sections of the Final Revised Environmental Impact Report (EIR) for the Fanita Ranch Project (proposed project), the City of Santee (City) received 155 comment letters. The thematic responses, comment letters, and the City's responses to them are included in this chapter. The responses to comments are based on the California Environmental Quality Act (CEQA) Guidelines, Section 15088(c), Evaluation of and Response to Comments, which states the following:

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

Table 1-1, Summary of Public Comments on the Second Recirculated Sections of the Final Revised EIR, lists the comment letters received from agencies, organizations, and individuals during the public review period for the Second Recirculated Sections. Comments and responses to comments have been assigned a letter (S [State Agencies], L [Local/Regional Agencies], O [Organizations], and I [Individuals]). A copy of each comment letter with its corresponding responses is provided in this chapter.

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

Table 1-1. Summary of Public Comments on the Second Recirculated Sections of the Final Revised EIR

No.	Commenter	Date
State Agencies		
S1	California Department of Fish and Wildlife	4/8/2025
S2	California Department of Transportation	4/9/2025
Local/Regional Agencies		
L1	County of San Diego	4/10/2025
Organizations		
O1	Center for Biological Diversity	2/21/2025
O2	Viejas Band of Kumeyaay Indians	2/21/2025
O3	California Chaparral Institute	4/9/2025
O4	Center for Biological Diversity	4/10/2025
O5	Endangered Habitats League	4/11/2025
O6	Preserve Wild Santee	4/10/2025
O7	Preserve Wild Poway	4/10/2025
O8	Santee Chamber of Commerce	4/16/2025
Individuals		
I1	Walter Schmidtke	2/22/2025
I2	Marianne Lamoureux	2/24/2025
I3	Alisa (via Miyu Oda-DesHotels) Dunlap	2/25/2025
I4	Craig Barnett	2/26/2025
I5	Julia McMillan	2/27/2025
I6	Laura Poore	2/28/2025
I7	Alma Fullam	3/1/2025
I8	Joseph McCormick	3/19/2025
I9	Marie Weber	3/19/2025
I10	JC	3/25/2025
I11	Kristy Hobbs	3/26/2025
I12	Kim Rones	3/26/2025
I13	Diane Bollenbecker	3/27/2025
I14	Stephen Houlahan1	3/27/2025
I15	Stephen Houlahan2	3/27/2025
I16	Christine and Andy Leidhoff	3/27/2025
I17	Katherine Pittman	3/27/2025
I18	Gloria Valenti Gerak	3/27/2025
I19	Cathy Bea	3/28/2025
I20	Linda Esry1	3/28/2025
I21	Linda Esry2	3/28/2025

Table 1-1. Summary of Public Comments on the Second Recirculated Sections of the Final Revised EIR

No.	Commenter	Date
I22	Margaret Field	3/28/2025
I23	Matt Cantor	3/29/2025
I24	Edward Hazlewood	3/29/2025
I25	Christina Kaylor	3/29/2025
I26	Mike Leathers	3/29/2025
I27	Alexandra Link	3/29/2025
I28	Kim Sullivan	3/29/2025
I29	Angie Vargas	3/29/2025
I30	Vince Vespertino	3/29/2025
I31	Kimberly Beach	3/30/2025
I32	Rachel Brown	3/30/2025
I33	Janice Chandler	3/30/2025
I34	Dan Chusid1	3/30/2025
I35	Dan Chusid2	3/30/2025
I36	Linda Hanenburg	3/30/2025
I37	Helen Humphries	3/30/2025
I38	Samantha Hurst	3/30/2025
I39	Nancy Kennedy	3/30/2025
I40	Greg Lambert	3/30/2025
I41	Pamela Meyers	3/30/2025
I42	John Riegel	3/30/2025
I43	Tanner Wheatley	3/30/2025
I44	Vicki Barton	3/31/2025
I45	Mary Ann Bennett	3/31/2025
I46	Peter and Deborah Calloway	3/31/2025
I47	Debra Clark	3/31/2025
I48	Sara Deacon	3/31/2025
I49	Amy Donahue	3/31/2025
I50	Joseph Eigner	3/31/2025
I51	Ed Ferrari	3/31/2025
I52	Claudia Hernandez	3/31/2025
I53	Josh Lares	3/31/2025
I54	Jo Malo	3/31/2025
I55	Steve Norquist	3/31/2025
I56	William Prince	3/31/2025
I57	Nelly Purvis	3/31/2025
I58	Jeanne Raimond	3/31/2025

Table 1-1. Summary of Public Comments on the Second Recirculated Sections of the Final Revised EIR

No.	Commenter	Date
I59	Marsha Taylor	3/31/2025
I60	Christine Tibbitts	3/31/2025
I61	Candi Wisley	3/31/2025
I62	Mike Dolan	4/1/2025
I63	Jon Fleming	4/1/2025
I64	Ioana Vladescu	4/1/2025
I65	Gabriela O'Sullivan	4/2/2025
I66	Jacob Syage1	4/2/2025
I67	Jacob Syage2	4/2/2025
I68	Brandy Alvarez	4/3/2025
I69	Ava Torre-Bueno	4/3/2025
I70	Mary and J.M. Vargo	4/4/2025
I71	Jacquelyn Guthrie	4/5/2025
I72	Iliana Sonntag	4/5/2025
I73	Jan Charvat	4/6/2025
I74	David Dugger	4/6/2025
I75	Sharon Guerrero	4/6/2025
I76	Rosemary Hutzley	4/6/2025
I77	Felicia Kalker	4/6/2025
I78	David Kramer	4/7/2025
I79	Donna Weiss	4/7/2025
I80	Jeff Young	4/7/2025
I81	Mike Aiken	4/8/2025
I82	Russ Barabe	4/8/2025
I83	JJ Buksa	4/8/2025
I84	Vicki Call1	4/8/2025
I85	Vicki Call2	4/8/2025
I86	Vicki Call3	4/8/2025
I87	Rosemary Ciotto	4/8/2025
I88	Chris Cipro	4/8/2025
I89	Carl Constantino	4/8/2025
I90	Mike Deacon	4/8/2025
I91	Linda and George Dochterman	4/8/2025
I92	Mike Helms	4/8/2025
I93	Alison Liebrecht	4/8/2025
I94	George McMullen	4/8/2025
I95	Nancy Rogers	4/8/2025

Table 1-1. Summary of Public Comments on the Second Recirculated Sections of the Final Revised EIR

No.	Commenter	Date
I96	Deborah Skinner	4/8/2025
I97	Jill and Robert Carroll	4/9/2025
I98	Barbara Foy	4/9/2025
I99	Janet Garvin	4/9/2025
I100	Brandon Goldberg	4/9/2025
I101	Stacie Greene	4/9/2025
I102	Ryan Guttman	4/9/2025
I103	Joni Hendrickson	4/9/2025
I104	Lynda Marrokal	4/9/2025
I105	Suellen Mayberry	4/9/2025
I106	Janet McLees	4/9/2025
I107	Paul Morrison	4/9/2025
I108	Donna Norris	4/9/2025
I109	Phillip Panuco	4/9/2025
I110	Michele Perchez	4/9/2025
I111	Rick Permetti	4/9/2025
I112	Stephanie Price	4/9/2025
I113	Daniel Rodgers	4/9/2025
I114	Debra Rodgers	4/9/2025
I115	Nicole Roesler	4/9/2025
I116	Rhonda Russell	4/9/2025
I117	Reyna Sauza	4/9/2025
I118	Kelie Schallert	4/9/2025
I119	Evelyn Schwarz	4/9/2025
I120	Lori Scribner	4/9/2025
I121	Jasen Torbett	4/9/2025
I122	Dean Velasco	4/9/2025
I123	John Williams	4/9/2025
I124	Daniel M. Bickford	4/10/2025
I125	Raymond Marrokal Boffman	4/10/2025
I126	Lennea Brown	4/10/2025
I127	Angela DiDio	4/10/2025
I128	Mary Fujimoto	4/10/2025
I129	David Hill	4/10/2025
I130	Heather Murray	4/10/2025
I131	Trevor Myers	4/10/2025
I132	John and Gina Olsen	4/10/2025

Table 1-1. Summary of Public Comments on the Second Recirculated Sections of the Final Revised EIR

No.	Commenter	Date
I133	Pamela Porteous-Hunt	4/10/2025
I134	Michael and Maria De La Cruz Ranson	4/10/2025
I135	Sylvia Rose	4/10/2025
I136	J. Sale	4/10/2025
I137	Stanley L. Streit	4/10/2025
I138	Karen Townsend	4/10/2025
I139	Katharine Turkle	4/10/2025
I140	Nichole Weinman	4/10/2025
I141	Chris Worthen	4/10/2025
I142	Robert Merrill	4/11/2025
I143	Nancy McDaniel	4/14/2025
I144	Richard Mercer	4/26/2025

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

In the responses to comments, revisions to the Second Recirculated Sections are indicated as underlined text (e.g., underlined text) and deletions as strikethrough text (e.g., ~~strikethrough text~~). In Chapter 2, text changes resulting from the comments received are also shown as underlined and/or strikethrough text. Please note that the revisions do not affect the conclusions of the Second Recirculated Sections.

1.2 Thematic Responses

Thematic Response 1 – Recirculation and Scope of Review Claims

This thematic response addresses comments that raise issues beyond the scope of the Second Recirculated Sections of the Final Revised Environmental Impact Report (EIR) for the Fanita Ranch Project (proposed project). The City of Santee (City) appropriately revised and recirculated those sections of the Final Recirculated Sections of the Final Revised EIR that the 2024 trial court found deficient. The proposed project itself has not changed from that analyzed in the certified 2020 Final Revised EIR. Specifically, 445 active adult units (senior housing) have always been included as part of the proposed project. The City need not respond to comments unrelated to the adequacy of the Second Recirculated Sections of the Final Revised EIR.

Here, the 2024 trial court ruling, judgment, and writ make it clear that only portions of the Final Recirculated Sections of the Final Revised EIR related to Santee General Plan inconsistency were found to be deficient and had to be corrected. Pursuant to California Environmental Quality Act (CEQA), if revisions to an EIR are limited to chapters or portions of the EIR, the lead agency needs only to recirculate the chapters or portions that have been modified (CEQA Guidelines, Section 15088.5[c]). Accordingly, the City determined that the Second Recirculated Sections would be circulated for public comment. The Preface explains that, regarding those portions of the Final Recirculated Sections of the Final Revised EIR that were not found deficient and were not being recirculated, the City would not seek or entertain any further comments (CEQA Guidelines, Section 15088.5[f][2]). The Notice of Availability further requested that comments be limited to the second recirculated documents that were made available for public review. If comments raise specific issues not related to the adequacy of the Second Recirculated Sections (e.g., wildfire, evacuation, transportation, noise), no further response is required in accordance with CEQA Guidelines, Section 15088.5(f)(2).

Further, case law holds that issues concerning the adequacy of an EIR that were litigated, or that could have been litigated, in a prior lawsuit may not be re-litigated in a second lawsuit after the deficiencies in an EIR identified in the first lawsuit have been corrected. In *Ione Valley Land, Air, and Water Defense Alliance, LLC v. County of Amador* (2019) 33 Cal.App.5th 165 (2019), the County corrected and then circulated a portion of an EIR addressing traffic that was previously found to be deficient. The petitioner then sued, claiming that the EIR was deficient in several other respects. The Court of Appeal held that decertification of the EIR did not allow new challenges on the parts of the EIR that were not found deficient. "[W]hether the EIR has been decertified does not alter the fact that the sufficiency of the EIR has been litigated and resolved" (33 Cal.App.5th at p. 172).

Refer also to *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1112, as modified (Apr. 9, 2004); *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 480–481 ("any challenge to an EIR or other agency action arising from facts in existence before the entry of judgment must be asserted in the proceeding before the entry of judgment. The failure to assert such a challenge before the entry of judgment . . . precludes a party from asserting the challenge in connection with post-judgment proceedings concerning compliance with the writ"); and *Tiburon Open Space Committee v. County of Marin* (2022) 78 Cal.App.5th 700, 752 (stating that CEQA litigation is not intended to become "'a never-ending battle of attrition with ever-changing targets for project opponents to aim for'" and "'is not meant to cause paralysis'" or be "manipulated to be a formidable tool of obstruction, particularly against proposed projects that will increase housing density.").

Here, other than Santee General Plan inconsistency, the Final Recirculated Sections of the Final Revised EIR were litigated sufficient on all other issues previously raised or that could have been raised. Environmental issues that were addressed in the Final Recirculated Sections and raised in

the prior CEQA litigation and found to not violate CEQA and those issues concerning the adequacy of the Final Recirculated Sections that could have been raised in the CEQA litigation but were not are no longer subject to challenge (*The Inland Oversight Committee v. City of San Bernardino* (2018) 27 Cal.App.5th 771, 779-780).

In summary, the City appropriately limited the scope of the second recirculation to portions of the Final Recirculated Sections of the Final Revised EIR that were found deficient by the 2024 court and limited responses to comments to those related to the adequacy of the Second Recirculated Sections of the Final Revised EIR.

Thematic Response 2 – Wildfire Risk

This thematic response addresses the following:

- Comments that express concern that the Fanita Ranch Project (proposed project) would place senior citizens within a designated Very High Fire Hazard Severity Zone (FHSZ)
- Comments that liken the proposed project's wildfire risk to the communities of Los Angeles, California (Pacific Palisades and Altadena), and Lāhainā, Maui, Hawai'i, which recently experienced wildfires, and suggest that these fires constitute new significant information that requires additional wildfire analysis of the proposed project
- Comments that state that revisions to state wildfire maps necessitate further wildfire risk analysis of the proposed project

This thematic response is based in part on the analysis presented by the Dudek Fire Protection Planning Team, which is included as Appendix U, Wildfire Safety Memorandum.

Senior Housing. Initially, age-restricted housing for older adults was not new to the proposed project. Indeed, the prior projects approved by the Santee City Council in 2020 and 2022 included active adult senior housing. Consequently, comments addressing senior housing and wildfire safety are beyond the scope of the Second Recirculated Sections of the Final Revised Environmental Report for the proposed project, and no further response is required. Please refer to Thematic Response 1, Recirculation and Scope of Review Claims.

Recent Wildfires. Comments suggesting similarities between wildfire risk on the proposed project site and recent California and Hawaiian wildfires as a basis for additional analysis of the proposed project wildfire risk are unsupported and inaccurate. Any comparison of the burned Pacific Palisades, Altadena, and Lāhainā communities with a new, master-planned, and ignition-resistant community, such as the proposed project, is inappropriate. Such comparisons mischaracterize and misunderstand the hazards, potential risks, and means by which new communities mitigate the types of devastation that occurred in these older communities. The comparison between the Los Angeles and Maui fires and the proposed project site's fire risk also disregards the factors that determine how well a community will perform against wildfire, including the fire environment

and its potential hazards, customized and maintained fuel modification zones, fire-hardened structures, code-compliant access, fire flow and hydrants, automatic interior fire sprinklers, flying ember protections, and ongoing maintenance, among others. These features are built into new master-planned communities like the proposed project. These features reduce the risk of FHSZ locations to acceptable levels, as evidenced by new communities that have been tested by fire and reported no related structural damage (refer to Sections 3.1.1, 3.1.3, and 6.4.1 of Appendix P1, Fire Protection Plan [FPP], of the Final Recirculated Sections of Final Revised Environmental Impact Report).

The science of fire protection has been codified in the California Fire, Building, and Residential Codes so that new communities are required to be built to withstand the type of wildfire they may experience. Data from the California Department of Forestry and Fire Protection (CAL FIRE) Office of the State Fire Marshal indicates that new communities are performing well against wildfires, while older communities are experiencing structural losses (see Sections 1.2, 2.2.7, 2.2.8, and 3.1.3 of Appendix P1). The Los Angeles wildfires occurred in a fire environment nearly 150 miles from the City of Santee (City) with different fuel types, weather, and terrain. The Pacific Palisades and Altadena fire devastation occurred due to the type of development that resulted in an urban conflagration (house-to-house ignitions) fueled by old and vulnerable construction (from the 1950s through 1970s) and the lack of formal and maintained fuel modification, reliable water for fire flow, and modern code-compliant access. Additionally, wildfire was not a focus of the planning, design, construction, and maintenance of these older communities like it is for new, master-planned, ignition-resistant communities. For example, evacuation in the Pacific Palisades was hindered by a single access to some areas that would not be code compliant today. The proposed project would include code-compliant primary and secondary access points.

Environmental review of the proposed project included a site-specific analysis of fire behavior using worst-case, historical weather input conditions and provided a protection system that exceeds the needs for those results. The old and vulnerable buildings in the Pacific Palisades and Altadena were the drivers for the fire devastation that occurred. Had those areas included the same type of master-planned community as the proposed project, the results would have been significantly different and would have aligned with the Orchard Hills community in the City of Irvine that experienced no impact from a significant wildfire under Santa Ana conditions (Silverado Fire 2020).

The proposed project's FPP analyzes fire behavior with input and review from the Santee Fire Department. The FPP accounts for Santa Ana-driven wildfires, fast fire spread rates, and fire intensity and provides a site-specific fire protection system designed to address the hazard and reduce the risk to acceptable levels. Statistics provided in comments regarding lost homes to wildfire ignore the age of the homes, their vulnerability to fire and embers, and the type of fuel modification provided. It is important to note that no homes have been lost in a master-planned, ignition-resistant community since the 2007 California Building Code was revised to include

Chapter 7A, Ignition Resistant Construction (Grijalva 2024). For these reasons, comments relating to recent wildfires do not constitute significant new information that requires additional analysis of the proposed project's wildfire risk.

Updated Fire Hazard Severity Zone Maps. Several comments suggest that CAL FIRE's updated FHSZ maps have changed conditions on the project site. However, the updated FHSZ maps have not affected the project site. Small additions were made to the Very High FHSZ within the proposed project's vicinity, and High and Moderate FHSZs were added in the area. However, the proposed project's FPP indicates that the majority of the project site has been designated as a Very High FHSZ for some time, and the design, protection features, and other fire safety measures constitute a system that addresses the fire hazard. The minor adjustments made to CAL FIRE's FHSZ maps for areas outside the project site do not affect the validity of the prior wildfire analysis for the proposed project. In Addition, the Santee City Council has not yet adopted CAL FIRE's updated FHSZ maps.

It is important to understand the difference between a hazard designation and the potential risk to a building or community. High hazard does not result in high risk if the building or community mitigates the hazard. Newer communities may be threatened by wildfire but have been planned, designed, constructed, and maintained to withstand wildfire encroachment and ember storms.

Although the project site is in a designated Very High FHSZ, it would have a significantly lower potential for actual loss than other older communities, such as Pacific Palisades and Altadena. This reasoning is based on the distinction between "hazard" (which the state categorizes) and "risk" (which the state does not quantify). "Hazard" is a property of the potential fire behavior (e.g., flame length, crown fire occurrence, capacity to generate embers) in the likely mature vegetation of a given area. "Risk," however, is the potential for structural loss from that fire. Thus, even if there is a potential low fire hazard in a given area (e.g., expected low flame lengths), a given home might be at high risk of ignition if the physical characteristics of the property facilitate structural ignition (e.g., flammable vegetation next to a home with wood siding).

Conversely (and describing the condition on the project site), a home might be in a high-hazard area (potential exposure to high flame lengths and ember generation) but may actually be at low risk of ignition if the house is built with ignition-resistant materials and the resident created and maintained adequate defensible space around the home. This is especially true in master-planned communities where fuel modification can be provided over large areas and includes a perimeter zone. Syphard et. al.'s (2013) research indicates that scenarios with lower housing density, large lots (ranchettes), and larger numbers of small, isolated clusters of development resulted in higher predicted fire risk.

The proposed project's FPP identifies the project site and nearby area as having been subject to wildfires. However, areas developed with ignition-resistant and managed landscapes built to the

latest requirements for building in an FHSZ remove the fuels that facilitate fire spread. Consequently, when a master-planned community, such as the proposed project, is constructed consistent with the FPP and modern fire and building codes, previous fires on the undeveloped land are not a reliable basis to predict future fires on the developed site. In addition, the proposed project includes the construction of a new fire station on site to further lessen wildfire risk. For these reasons, the minor modifications to CAL FIRE's FHSZ maps do not necessitate further review of the proposed project's wildfire risks.

Thematic Response 3 – No Public Vote Requirement

This thematic response addresses comments regarding voters' rights related to the Fanita Ranch Project (proposed project), specifically related to the referendum petition that was brought related to the prior project approvals and/or the City of Santee's (City's) Measure N. The City respects the voting rights of its residents; however, no public vote is required for the proposed project.

Referendum Against the Prior Project was Rescinded due to a Court Order Voiding Project Approvals in California Environmental Quality Act Litigation

On September 23, 2020, the Santee City Council adopted several resolutions approving the previously requested discretionary actions for the proposed project (previously requested discretionary approvals are referred to herein as the "prior project"). The prior project included the adoption of Resolution 094-2020, which included a General Plan Amendment (Case File GPA2017-2).

On October 29, 2020, proponents of a Referendum Against a Resolution Passed by the City Council of the City of Santee (Resolution 094-2020) filed a referendum petition seeking to overturn Resolution 094-2020 and, thereby, rescind the General Plan Amendment. On January 13, 2021, the Santee City Council determined to submit the referendum to the voters, consistent with the California Elections Code.

However, in the interim, a lawsuit was filed challenging the adequacy of the Final Revised Environmental Impact Report (EIR) certified for the prior project. On March 25, 2022, the trial court entered judgment and a writ of mandate (order) directing the City to set aside both certification of the Final Revised EIR and the approvals for the prior project, including its General Plan Amendment (Resolution 094-2020). In response to and as a direct result of the trial court's order, on May 25, 2022, the Santee City Council adopted a resolution setting aside the prior project approvals, including Resolution 094-2020.

Accordingly, the prior project approvals were voided as a result of the CEQA litigation, rendering the referendum moot (California Civil Code, Section 3532). For that sole reason, the Santee City Council acted to remove the referendum from the ballot by Resolution 083-2022 on June 8, 2022.

The Recirculated Sections were prepared in June 2022 to correct the deficiencies identified in the trial court's 2022 ruling, judgment, and writ. The Recirculated Sections included new or replaced

Chapter 0, Preface, and Section 4.18, Wildfire, in their entirety. The Recirculated Sections also included strikeout/underline changes to Chapter 3, Project Description, and Section 4.10, Land Use and Planning, because the proposed project no longer requested legislative approvals, including a General Plan Amendment, Specific Plan, Rezone, or Development Agreement. Instead, it requested adjudicatory approval of a Development Plan, Vesting Tentative Map, Development Review Permit, and Conditional Use Permits. On September 14, 2022, the Santee City Council held a public hearing and voted unanimously to certify the Final Recirculated Revised EIR and approve the prior project.

Another lawsuit was filed challenging the adequacy of the Final Recirculated Revised EIR. In September 2024, the San Diego County Superior Court (Hon. Katherine A. Bacal, presiding) issued a ruling identifying deficiencies in the Final Recirculated Revised EIR related to Santee General Plan inconsistency. No other deficiencies in the Final Recirculated Revised EIR were identified. The matter was remanded to the City to correct the deficient portions of the Final Recirculated Revised EIR. The Second Recirculated Sections REIR have been prepared to correct the deficiencies identified in the trial court's 2024 ruling, judgment, and writ.

Thus, the prior project approvals were repealed as a result of a court order in the CEQA litigation. The prior referendum was moot and does not apply to the current proposed project. Further, the proposed project does not seek re-passage of the challenged General Plan Amendment or any legislation that may be subject to a referendum. The California Elections Code also does not apply to the proposed project because it does not seek City approval of any legislative act that would be enacted by ordinance. Finally, even if the California Elections Code did apply, 3 years have elapsed since the May 25, 2022, rescission of the prior project approvals, and as noted, the 2022 prior project did not involve a General Plan Amendment or any legislation that may be subject to a referendum.

Measure N Does Not Require a Public Vote on the Proposed Project

Comments request that the City respect the court regarding voters' rights to control zoning of the proposed project. At the November 2020 election, City voters adopted Measure N, an initiative measure that establishes a voter approval requirement for certain legislative actions that would increase residential density or otherwise intensify land use over that currently permitted by the Santee General Plan and zoning.

The trial court's ruling noted that petitioners argued a General Plan Amendment was required for the proposed project, which would trigger Measure N's requirement for a public vote prior to approval (Ruling p. 5). However, if the City finds that no General Plan Amendment or other legislative action is required for the proposed project, Measure N does not mandate a public vote. Measure N also specifically provides that it shall not be construed to interfere with rights to obtain density bonuses or other entitlements available under affordable housing laws.

The City Attorney's Impartial Analysis for Measure N noted that judicial interpretation of the measure "may be required to assess the Measure under Government Code section 66300(b)(1)(B)." Section 66300(b)(1)(B), also known as Senate Bill 330, appears to include language that would limit a city or its voters through initiative power from enacting or enforcing any development standard that imposes a cap on housing development. It states that with respect to land where housing is an allowable use, the city (defined to include voters through initiative power) "shall not enact a development policy, standard, or condition" that would have any of the following effects: (A) decreasing the intensify of land uses; (B) imposing a moratorium or limitation on housing development; (C) imposing new subjective design standards post January 1, 2020; and (D) placing caps or limits on the number of applications or permits during time period (California Government Code, Section 66300[a][3], [b][1][B][i], [b][1][D][i]–[iii]).

As noted in Appendix T, an argument could be made that Measure N conflicts with state housing law and policy and is prohibited. In *Building Industry Assn. v. City of Oceanside* (1994) 27 Cal.App.4th 744, 771, the court held that a proposition conflicting with state housing policy on its face can be invalidated as a matter of law, rendering it invalid from the date of adoption (refer to *Yes in My Back Yard v. City of Culver City* [2023] 96 Cal.App.5th 1103, 1112–1120; California Government Code, Section 66300, 66301 [extending Section 66300's effect to January 1, 2034]).

Even if not pre-empted, Measure N does not apply to the proposed project. Further, Santee residents did not vote for or against the proposed project itself. First, no public vote is triggered under Santee General Plan Policy 12.1. Neither the Santee General Plan nor the Zoning Ordinance prescribes a density limit for the project site. Therefore, the proposed project does not "increase the residential density permitted by law." With Density Bonus Law waivers, the proposed project is permitted on site; no "increase" in permitted density would occur (Santee General Plan Policy 12.1[1]; California Government Code, Section 65915[e][1], [f][5], [j][1]; 65589.5[j][1], [3]). Additionally, under the Essential Housing Program, the proposed residential density is permitted, and the lot size standard is waived. Lastly, there is no proposed change in land use category or redesignation to residential, commercial, or industrial (Santee General Plan Policy 12.1[2], [3]).

Second, the proposed project does not propose changes to the slope criteria, minimum parcel sizes, or lot averaging provisions of the Santee General Plan that would permit increased density or intensity under Policy 12.2. If the City finds that the proposed project is a qualifying project, the proposed project is entitled to waive the lot size provision of Guiding Principle 3 under the Density Bonus Law (California Government Code, Section 65915[e][1], [n]; *Wollmer v. City of Berkeley* [2011] 193 Cal.App.4th 1329, 1349 [waived development standards are not "applicable"]). Further, the Essential Housing Program provides such waivers. No General Plan Amendment or other legislative action is required for the waiver (California Government Code, Section 65915[f][5], [j][1]).

Thus, under the text of Santee General Plan Policy 12.4 and state law, including the Density Bonus Law, the voter requirements are inapplicable and pre-empted (California Government Code, Section 65915[e][1], [f][5], [j][1]; 65589.5[j][1], [j][3]). Additionally, Section 5 of Urgency Ordinance No. 592 makes the findings set forth in Policy 12.4 for Essential Housing Projects:

> The City Council finds that the adoption of this Ordinance is necessary to comply with state law governing the provision of housing, including but not limited to, Government Code sections 65583 and 65584 and additional affordable housing requirements, and is necessary to achieve the goals set forth in the City's Housing Element. The City Council finds that this Ordinance permits no greater density than is necessary to accommodate the required housing. The City Council finds that the criteria identified in the Essential Housing Program as establishing eligible Essential Housing Project sites have been narrowly tailored to the housing needs of the City, and alternative sites for Essential Housing Projects are not available to satisfy the requirements of state housing law.

Accordingly, Measure N does not require a public vote on the proposed project.

Comment Letter S1: California Department of Fish and Wildlife, April 8, 2025

Docusign Envelope ID: 4B435788-78A4-438E-8612-F48CF0F962CA

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

S1

April 8, 2025

Sandi Sawa
Director of Planning & Building
City of Santee
10601 Magnolia Avenue
Santee, CA 92071
ssawa@cityofsanteeca.gov

SUBJECT: SECOND RECIRCULATED SECTIONS OF THE FINAL REVISED ENVIRONMENTAL IMPACT REPORT FOR THE FANITA RANCH PROJECT, SCH NO. 2005061118

Dear Sandi Sawa:

The California Department of Fish and Wildlife (CDFW) has reviewed the Second Recirculated Sections of the Final Revised Environmental Impact Report (2025 REIR) from the City of Santee (City) for the Fanita Ranch Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

S1-1 Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program (Fish and Game Code 2800 et seq.). The City, in coordination with CDFW and the United States Fish and Wildlife Service (collectively, the Wildlife Agencies), has worked for several years toward

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

S1-1: This comment provides an introduction to the comment letter, explains the California Department of Fish and Wildlife's role as a Trustee Agency, and summarizes the Fanita Ranch Project (proposed project). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

S1-2: This comment provides information on the relationship between the City of Santee's (City's) Essential Housing Program, Santee General Plan, and Habitat Loss Incidental Take Ordinance. This comment also requests a specific revision to Section 4.10, Land Use and Planning, of the Second Recirculated Sections of the Final Revised Environmental Impact Report. The City agrees with this comment, and Section 4.10, Land Use and Planning, has been revised as follows:

> Urgency Ordinance No. 592 controls over any other City plan or ordinance in the event of a conflict, with its interpretation being afforded the fullest possible weight to the interest, approval, and provision of housing except where City plans or ordinances relate to the implementation of state or federal regulations and/or permits (Appendix R).

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S1-1 cont.

developing an NCCP/Habitat Conservation Plan (HCP) Subarea Plan under the Subregional Multiple Species Conservation Program; however, a Subarea Plan has not yet been adopted by the City or permitted by the Wildlife Agencies. CDFW anticipates that the Draft Subarea Plan and associated Draft EIR will be brought forward for public review in the near future.

PROJECT DESCRIPTION SUMMARY

The Project proposes a planned community located within the northwest portion of the City that includes up to 3,008 housing units, commercial uses, parks, agricultural areas and open space. Approximately 1,650 acres would be designated as a habitat preserve (Preserve). The 2025 REIR was prepared in response to an August 2024 order of the San Diego County Superior Court that identified deficiencies in the 2022 Recirculated Revised Final EIR (2022 REIR) related to the General Plan consistency analysis. The 2025 REIR recirculated sections include revisions to the Preface and Land Use and Planning Section (Section 4.10); addition of Appendix S. *Preserve Wild Santee v. City of Santee* County of San Diego Superior Court's Ruling, Judgement, and Writ; and a memorandum providing additional legal support and analysis for the revisions to Section 4.10 (Memorandum). Per the 2025 REIR, the description of the Fanita Ranch Project has not changed from the 2022 REIR.

COMMENTS AND RECOMMENDATIONS

S1-2

In August 2021, the City adopted an Essential Housing Program (Ordinance 592) that was subsequently amended in February 2025. A project can qualify as an Essential Housing Project (EHP) under Ordinance 592 through a ministerial decision made by the Director of Development Services based on objective criteria set forth in a Checklist (https://www.cityofsanteeca.gov/essential-housing). The Fanita Ranch Project has been certified as an EHP by the City. Per the Memorandum, certification of a project as an EHP essentially waives any conflicting land use regulations or ordinances, including the General Plan, that the project may be in violation of. According to the 2025 REIR, the EHP "controls over any other City plan or ordinance in the event of a conflict, with its interpretation being afforded the fullest possible weight to the interest, approval, and provision of housing" (2025 REIR, pg. 4.10-29).

The Wildlife Agencies comment letter on the 2022 REIR dated July 25, 2022, outlines the important role of the General Plan (and associated future Habitat Loss Incidental Take Ordinance; HLIT) in implementing the forthcoming Subarea Plan. The General Plan and HLIT will ensure compliance with the terms of an adopted and permitted NCCP/HCP. The letter requested clarification on how Ordinance 592's associated waivers of General Plan requirements may impact implementation of a future Subarea Plan if applied to forthcoming projects anticipated to be covered activities. The City responded to our request stating that this issue is not germane to the Fanita Ranch

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Project; however, CDFW contends that the language set forth in the 2022 and 2025 REIRs may be precedent-setting as it memorializes unclear project approval procedures. It remains unclear from the language in the 2025 REIR whether this waiver would potentially extend to a future HLIT.

While we are not contesting the eligibility of the Fanita Ranch Project under the EHP in this letter, CDFW requests that the City revise the 2025 REIR to clarify that certification of a project under Ordinance 592 would not waive consistency with the provisions of a future HLIT. CDFW is concerned that the language cited above in the 2025 REIR could undermine the implementation of a future Subarea Plan if not clarified. We offer the following recommended revisions to the statement on pg. 4.10-29 of the 2025 REIR (edits in italics):

S1-2 cont.

> "Urgency Ordinance No. 592 controls over any other City plan or ordinance in the event of a conflict, with its interpretation being afforded the fullest possible weight to the interest, approval, and provision of housing *except where City plans or ordinances relate to the implementation of state or federal regulations and/or permits*."

CONCLUSION

CDFW appreciates the opportunity to comment on the 2025 REIR. Questions or comments regarding this letter should be directed to Heather Schmalbach, Senior Environmental Scientist (Specialist), at Heather.Schmalbach@wildlife.ca.gov.

Sincerely,

Signed by:
Glen Lubcke
AD7D070BCB66466...

Glen M. Lubcke

Environmental Program Manager South Coast Region

ec: Office of Planning and Research, State.Clearinghouse@opr.ca.gov

California Department of Fish and Wildlife

Glen Lubcke, Region 5, Environmental Program Manager, Glen.Lubcke@wildlife.ca.gov

Melanie Burlaza, Region 5, Supervisor, Melanie.Burlaza@wildlife.ca.gov

Docusign Envelope ID: 4B435788-78A4-438E-8612-F48CF0F962CA

Heather Schmalbach, Region 5, Senior ES (Spec),
Heather.Schmalbach@wildlife.ca.gov

U.S. Fish and Wildlife Service

Jonathan Snyder, Jonathan_D_Snyder@fws.gov

Comment Letter S2: California Department of Transportation, April 9, 2025

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR S2

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 709-5152 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov

April 9, 2025

11-SD-52, 67, 125
PM VAR
Fanita Ranch
Second Recirculated Sections of Final Revised EIR/SCH#2005061118

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

Dear Ms. Sawa:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Second Recirculated Sections of Final Revised Environmental Impact Report (EIR) for the Fanita Ranch Project located near State Route 52 (SR-52), State Route 67 (SR-67) and State Route 125 (SR-125) in Santee. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

S2-1 Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

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

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

S2-1: This comment is an introduction to the comment letter describing the California Department of Transportation's (Caltrans') goals and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report (EIR) for the Fanita Ranch Project (proposed project). Therefore, no further response is required.

Ms. Sandi Sawa, Director of Planning and Building
April 9, 2025
Page 2

S2-1 cont.

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

Caltrans has the following comments:

System Planning

1. Fanita Ranch Project Plan
   a. NOA Form
      i. Page 4 of the Notice of Availability (NOA) Form does not include a key of the project location map to distinguish the two areas shown (northern portion is a dark grey, the rest is a light color). From cross-referencing with the Land Use and Planning TC document, the overall shape seems to be the boundaries of the City of Santee. Please include a key or label to clearly identify each area.

S2-2

   b. 4.10 Land Use and Planning TC
      i. Please update page 4.10-10 that discusses the San Diego Forward: The Regional Plan to reference SANDAG's 2021 Regional Plan and Draft 2025 Regional Plan instead.
      ii. Page 4.10-32 and 4.10-36 of the REIR states construction for Fanita Ranch is anticipated to begin in 2023, which no longer applies. Please adjust to reflect the current timeline.

S2-3

      iii. There is no mention of Caltrans in this section other than references to "freeways" for areas that discuss the Noise Element on page 4.10-14 and the Santee General Plan on pages 4.10-37 and 4.10-40. Please include Caltrans in other relevant sections.
      iv. Bullet 12d. on page 4.10-12 mentions the Mast Blvd. widening/SR-52 Pavement Improvement and Auxiliary Lane Project: "The participation in and extension of Mast Boulevard east and/or west to connect with State Highways 67 or 52 and Mission Gorge Road." Please be aware of the Caltrans public notice about this project as it provides details about the intended scope of work.
2. Comprehensive Multimodal Corridor Plans (CMCP)
   a. Please note the following updates on relevant CMCPs to the Fanita Ranch Project Area:
      i. As of September 2022, SR 67 San Vicente CMCP has been completed.
      ii. As of June 2023, SR 52 Coasts, Canyons, and Trails CMCP has been completed.

S2-4

      iii. SR 125 CMCP has been put on hold.

"Improving lives and communities through transportation"

S2-2: This comment requests a revision to the map provided in the Notice of Availability (NOA) for the Second Recirculated Sections of the Final Revised EIR. The City of Santee (City) acknowledges the absence of a map legend on the Fanita Ranch Location Map provided in the NOA. All future proposed project notices and documents containing maps will be clearly labeled for understanding. Revisions to the NOA are not required. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

S2-3: This comment requests that several revisions be made to Section 4.10, Land Use and Planning. These include updating references to the San Diego Association of Governments' Regional Plan, updating the construction year, and adding Caltrans to relevant sections of the consistency table. The City acknowledges these requests and notes the information provided regarding improvements to State Route 52. However, revisions to the Second Recirculated Sections of the Final Revised EIR are not required, as the suggestions are outside the scope of review or unspecific and do not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Please refer to Thematic Response 1, Recirculation and Scope of Review Claims.

3. Other Proposed Improvements
    a. Caltrans Workplan Status Report: This report provides the progress of ongoing Caltrans projects, completed tasks, budget status, etc. The following Caltrans projects are currently in progress near the Fanita Ranch project area.
        i. SR 52
            - EA 11-43012: SR-52 Operational Improvement (PM 7.40/14.90) (p. 544)
        ii. SR 67
            - EA 11-43004: SR 67/Woodside Avenue Peer Oversight (PM 2.637/2.795) (Construct intersection improvements) (p. 549)
            - EA 11-43118 67 at Riverford Road Operational Improvements (PM R3.70/R4.20) (p. 550)

S2-4 cont.

4. Caltrans District 11 has a Transit Planner that can assist on future transit planning and coordination efforts between local jurisdictions.

Sustainability

Please continue to work with Caltrans District 11 regarding wildfire evacuation discussions and planning for transportation projects and transportation corridors (underway). This large development appears to have many beneficial fire mitigations (i.e. additional fire station(s), community education and preparedness, defensible space, and fire-resistant structures, but will still increase the population of the area that would ultimately use the transportation network daily and in the event of an emergency.

Environmental

S2-5

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

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

S2-4: This comment provides background information on several Comprehensive Multimodal Corridor Plans and ongoing projects. The City appreciates Caltrans' ongoing transit planning efforts and will continue to coordinate as needed. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

S2-5: This comment explains Caltrans' role in sustainability planning and as a Responsible Agency under California Environmental Quality Act (CEQA) and requirements for work within Caltrans' right-of-way. Proper permits and approvals would be obtained before any work required within Caltrans' facilities. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to lighting, signage, drainage, guardrail, slopes and landscaping.

Right-of-Way

S2-5 cont.

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

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

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

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

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

Sincerely,

Kimberly D. Dodson

KIMBERLY DODSON
Branch Chief
Local Development Review

"Improving lives and communities through transportation"

Comment Letter L1: County of San Diego, April 4, 2025

L1

From: Sandi Sawa
To: Marni Borg
Cc: Shawn Hagerty; Amanda Daams; Amy Hoyt
Subject: FW: COSD comment letter - Fanita Ranch Final EI/NOA
Date: Thursday, April 10, 2025 12:39:08 PM
Attachments: image001.png
2025-04-10-25 Fanita Ranch Final EIR NOA.cleaned.pdf
Exhibit A -Fanita Ranch_DPW Comment Letter_3.14.25.pdf
image002.png
Importance: High

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Gaines, Georgina <Georgina.Gaines@sdcounty.ca.gov>
Sent: Thursday, April 10, 2025 12:13 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Kazmer, Jennifer Y <Jennifer.Kazmer@sdcounty.ca.gov>; Vertino, Timothy <Timothy.Vertino@sdcounty.ca.gov>; Raphael, Rita <Rita.Raphael@sdcounty.ca.gov>; Landau, Masha <Masha.Landau@sdcounty.ca.gov>; Aquino, Emmet <Emmet.Aquino@sdcounty.ca.gov>; O'Barr, Madison <Madison.OBarr@sdcounty.ca.gov>; Young, Dallin <Dallin.Young@sdcounty.ca.gov>
Subject: COSD comment letter - Fanita Ranch Final EI/NOA
Importance: High

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L1-1: This comment provides information on several County of San Diego (County) departments, the Fanita Ranch Project's (proposed project's) potential to affect County facilities, and the County's role in the proposed project's development. Additionally, it states that the proposed project would be required to obtain necessary County approvals.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

Good Afternoon, Ms. Sawa,

Attached is the County of San Diego's comment letter in response to the Request for Comments on the Second recirculated sections of the Final Revised Environmental Impact for Fanita Ranch (EI/NOA) for the City of Santee.

Please review the letter and let me know if you have any questions.

Georgina Gaines, Planning Commission
Secretary
Planning & Development Services
O: (858)505-6445 |C: (619) 517-4193
SanDiegoCounty.gov | News Updates | Engage

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VINCE NICOLETTI
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND DRIVE, SUITE 210, SAN DIEGO, CALIFORNIA 92123
(858) 505-6445 General • (858) 694-2705 Codes Compliance
(858) 565-5920 Building Services

April 10, 2025

Sandi Sawa, AICP
Director of Planning & Building
Planning & Building Department
City Hall, Building 4
10601 Magnolia Avenue
Santee, California 92071

Sent via email to: ssawa@cityofsanteeca.gov

REQUEST FOR COMMENTS ON THE NOTICE OF AVAILABILITY OF SECOND RECIRCULATED SECTIONS OF THE FINAL REVISED ENVIRONMENTAL IMPACT FOR FANITA RANCH (SCH# 200506118)

Dear Ms. Sawa,

L1-1 The County of San Diego (County) staff reviewed the City of Santee (City) Notice of Availability of Second Recirculated Sections of the Final Revised Environmental Impact Report for Fanita Ranch (Project), dated February 24, 2025. County staff appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for the Project.

GENERAL

The County's Land Use and Environment Group has developed Guidelines for Determining Significance that are used to determine the magnitude of environmental impacts and mitigation options for addressing potentially significant impacts in the unincorporated portions of the county. Project impacts that could have potentially significant adverse effects to the unincorporated county or County facilities should be evaluated using the County's Guidelines for Determining Significance. These guidelines are available online at: http://www.sandiegocounty.gov/pds/procguid.html.

DEPARTMENT OF ENVIRONMENTAL HEALTH AND QUALITY (DEHQ)

The County's DEHQ Hazardous Materials Division (HMD) is responsible for the protection of public health and the environment by ensuring hazardous materials, hazardous waste, medical waste, aboveground tanks, and underground storage tanks are properly managed. The HMD has completed its review and has the following comments regarding the Project.

1. PLAN CHECK: Due to the building and construction this project proposes, the owner/operator may be required to submit a Hazardous Materials Questionnaire to the Hazardous Materials Division (HMD) and complete a HMD Hazardous Materials Plan Check review prior to issuance of a certificate of occupancy by the Building Department. Additional information on Plan Check requirements can be found on our website at: Hazardous Materials Plan Check (sandiegocounty.gov)

2. HAZARDOUS MATERIALS BUSINESS PLAN: The planned community proposal includes a possible school, fire station, library, sports park, hotel, and Homeowner's Association (HOA) and more. These facilities have been known to commonly store 55gallons or more of hazardous materials and/or generate any amount of hazardous waste or medical waste. If chemicals/hazardous materials/hazardous wastes stored in project will hold a volume greater than or equal to 55 gallons, 500 pounds or 200 cubic feet each (e.g. gasoline, diesel fuel, lubricating oil, grease, cleaning products, landscaping chemicals and fertilizers, and solvents, etc.), the facility owner/operators(s) are required to submit a Hazardous Materials Questionnaire to the Hazardous Materials Division (HMD) and complete a Hazardous Materials Plan Check review prior to operation. Any proposed activities involving the storage and handling of hazardous materials will require the owner/operator and/or contractor(s) to comply with local and state laws and regulations. Additional information on HMBP requirements can be found on our website at: HMBP (sandiegocounty.gov)

3. HAZARDOUS WASTE: All construction-related hazardous wastes (e.g. waste gasoline, waste diesel fuel, waste lubricating oil/grease, waste cleaning products, waste landscaping chemicals and fertilizers, and waste solvents, etc.) generated and stored onsite must be properly labeled and handled in manner to prevent release to the environment. In addition, the owner/operator must ensure any hazardous wastes generated onsite during construction is properly disposed by registered hazardous waste transporter and compliant with local and state laws and regulations. Additional information on Hazardous Waste requirements can be found on our website at: Hazardous Waste (sandiegocounty.gov)

4. ABOVEGROUND PETROLEUM STORAGE: If one operation has greater than or equal to 1,320 gallons of petroleum (e.g. gasoline, diesel, oil, used oil, etc.) stored in aboveground tanks and containers 55-gallons or greater in size, or has less than 1,320 gallons of total petroleum storage capacity in one or more Tank In an Underground Area (TIUGA), then they are subject to regulatory requirements under the California Aboveground Petroleum Storage Act (APSA), and a Spill Prevention, Control and Countermeasures (SPCC) Plan may be required. IMPORTANT: Facilities storing an aggregate of 10,000 or more gallons of petroleum must have their SPCC plan certified by a professional engineer. Additional information on APSA can be found on our website at: APSA (sandiegocounty.gov)

5. UNDERGROUND STORAGE TANKS: If an underground storage tank (UST) that previously held a hazardous substance is unexpectedly discovered during the Project, the property owner/operator shall apply to the HMD for a removal permit in accordance with state law before

L1-1 cont.

removing the tank and connected piping. Additional information can be found on our website at: UST Plan Check

6. CONTAMINATED SOIL: If it is discovered that any hazardous materials and or waste has been released to the environment before or during the project, the contaminated environmental media (e.g. soil) must be removed and property managed and disposed. A Voluntary Assistance Project (VAP) may need to be initiated to ensure the hazardous materials/waste release has been properly cleaned up. See the HMD's VAP website for additional information: Voluntary Assistance Program (sandiegocounty.gov)

Please note, the HMD has the authority pursuant to state law and County Code to regulate facilities that handle or store hazardous materials and/or generate hazardous/medical wastes. The HMD will apply that authority as necessary to protect public health and the environment. Additional information about HMD can be found on our website at: Hazardous Materials Division (sandiegocounty.gov)

For further coordination regarding the DEHQ comments please contact Rita Raphael, Office Support Specialist, at rita.raphael@sdcounty.ca.gov, or 619-756-5388.

DEPARTMENT OF PARKS & RECREATION (DPR)

L1-1 cont.

DPR enhances the quality of life in the County by providing exceptional parks and recreation experiences and preserving significant natural resources. The proposed Project has a potential to impact County-maintained parks. The County's DPR requests coordination and additional information/reports addressing the following items:

7. The County's DPR owns and manages the Sycamore Canyon/Goodan Ranch County Preserve north of the Project site. DPR recently completed a Resource Management Plan Update for the Preserve, which includes trail connections that could connect to trails proposed as part of the Fanita Ranch Project. Please ensure all project elements, including proposed trails, are consistent with the trail connections on adjacent properties. The final Resource Management Plan and supporting documents can be found at:
https://www.sdparks.org/content/sdparks/en/AboutUs/Plans/MSCP.html.

8. Figure 21 of the Public Access Plan circulated in 2020 and Figure 3-6 of the Project Description recirculated in 2022 show several trails leading off of the project site to the northwest that do not appear to connect to authorized, legal trails and would likely encourage trespassing in sensitive areas within and adjacent to Clark Canyon. As discussed in the County's comment letters in 2018 and 2020, unauthorized trail creation and use, particularly from the south of Sycamore Canyon/Goodan Ranch Preserve is an issue. The County requests that the City ensures that all trail connections leading off of the project site connect only to authorized, legal trails and remove connections that do not meet those requirements.

9. Additionally, the Public Use Monitoring Tasks discussed in Table 2 of the Preserve Management Plan do not provide appropriate frequencies. The frequency for "Monitor/Maintain/Repair Trails" is listed as "as needed" and "Control Public Access" and "Provide Ranger Patrols" are listed as "quarterly". This will not be adequate to prevent unauthorized use and the County requests a significant increase the frequency of monitoring.

Please contact Emily Pacholski at Emily.Pacholski1@sdcounty.ca.gov for more information or if you have any questions on DPR comments.

DEPARTMENT OF PUBLIC WORKS (DPW)

The County's Department of Public Works (DPW) Watershed Protection Program helps to ensure that our waterways are protected by preventing pollutants from entering the County's storm drain system in compliance with our Municipal Stormwater permit. Watershed has completed its review and has the following comments regarding the Project. The Project could impact the County drainage facilities, County-maintained roadways, and floodplains. The County requests that the City address the following comments and provide responses to DPW:

L1-1 cont.

10. Based on the project's footprint, portions of the project site lie in drainage facilities that are considered tributaries to the County's drainage facilities downstream. In the past, some of the County's drainage facilities were designed and built using methodology resulting in undersized drainages, unlike the methodology and design standards used today. The proposed project's drainages are tributaries to some of these undersized County facilities located downstream. To prevent creating safety hazards to the County facilities, the County requests the City of Santee to demonstrate that stormwater flows would not increase as a result of the proposed project. Alternatively, please demonstrate that the downstream facilities have the capacity to handle larger flows. Please see the County's Hydraulic Design Manual Section 6.2.1 for additional information. DPW requests the City address the above-discussed concern and that proposed drainage-specific design be provided to the County DPW for approval.

11. If any County-maintained roads are trenched or cut within three years of the roads being resurfaced, this will constitute a violation of the County's Cut Policy, and the City of Santee will be required to resurface impacted sections of the roadways with the same treatment. Please coordinate with Bharath Mallikarjun, Utility Coordinator, prior to construction and for updates on which County roads were resurfaced and when. He can be reached at (858) 505-6942 or at Bharath.Mallikarjun@sdcounty.ca.gov.

    The City can visit the County's Resurfacing Projects mapping application, to view resurfacing status of the County-maintained roadways, including those "completed", "in-construction", and "programmed" for resurfacing.

12. Any proposed work within the FEMA and/or County-mapped floodplain (San Diego River and/or future Sycamore Creek) requires a CLOMR/LOMR, per the Code of Federal Regulations (CFR) and the County's Flood Damage Prevention Ordinance (FDPO). If the proposed work will change the flood-mapping or base-flood elevation (BFE) of the mapped floodplain (see attached Exhibit A), a CLOMR/LOMR is required per FDPO Section 811.403.d. If any work is proposed within the mapped-floodway, a complete hydraulic analysis and 'no-rise' certification are required, per FDPO Section 811.506.a. No adverse impacts are allowed to any adjacent properties or public roadways. If any structures or utilities are proposed in the mapped-floodplain, they are required to be elevated to a minimum of 1-foot above the BFE of the San Diego River and/or future Sycamore Creek (new FEMA mapping), per FDPO Section 811.501.c.

13. The County requests that the City coordinate with the County's Flood Control District regarding any proposed impacts to existing Flood Control District facilities.

14. For further coordination regarding the DPW comments above, please contact Masha Landau, Land Use/Environmental Planner III, at masha.landau@sdcounty.ca.gov, or 619-385-7591.

The County appreciates the opportunity to comment on the Project. We look forward to receiving future documents related to the Project and providing additional assistance, at your request. If you have any general questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planning Manager, at (858) 505-6677, or via e-mail at timothy.vertino@sdcounty.ca.gov.

L1-1 cont.

Sincerely,

Jennifer Kazmer

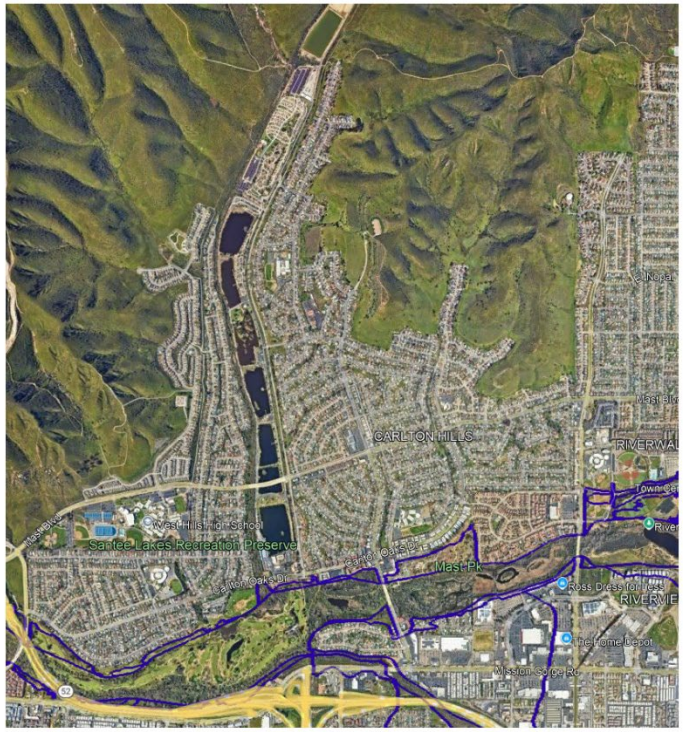
Jennifer Kazmer, Chief
Long Range Planning Division
Planning & Development Services

Enclosures: Exhibit A- FEMA and County Floodplain Areas

cc: Dallin Young, Director of Policy, Board of Supervisors, District 2
Madison O'Barr, CAO Staff Officer, LUEG
Timothy Vertino, Land Use/Environmental Planning Manager, PDS
Rita Raphael, Office Support Specialist, DEHQ
Masha Landau, Land Use/Environmental Planner, DPW
Emmet Aquino, Park Project Manager, DPR

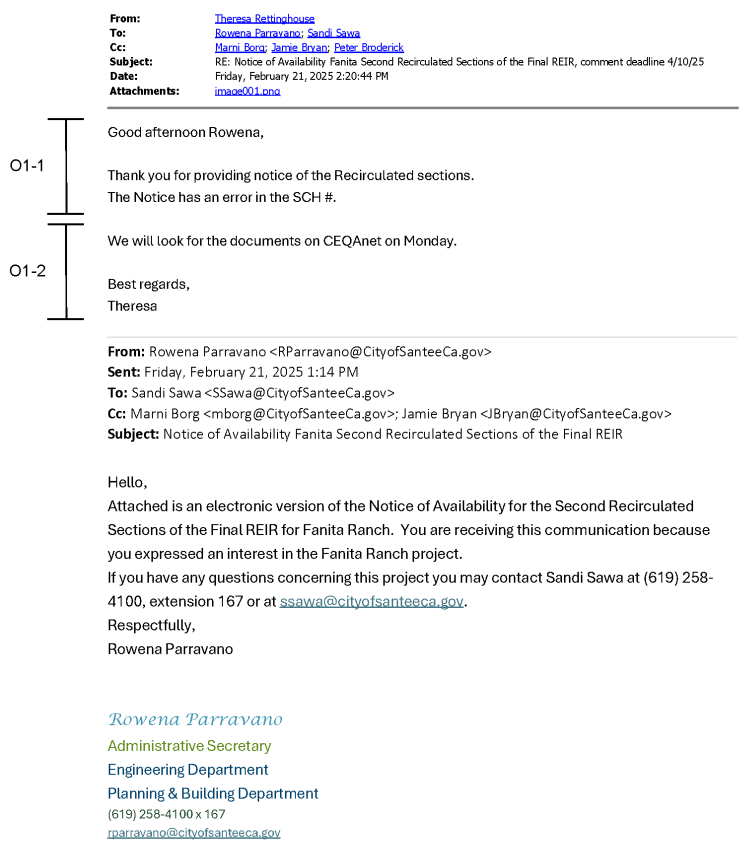
Fanita Ranch Project
2nd Recirculated Final Revised EIR DPW Comment Letter
March 14, 2025
Page 3

EXHIBIT A - FEMA and County Floodplain Areas



Comment Letter O1: Center for Biological Diversity, February 21, 2025

O1



From: Theresa Rettinghouse
To: Rowena Parravano; Sandi Sawa
Cc: Marni Borg; Jamie Bryan; Peter Broderick
Subject: RE: Notice of Availability Fanita Second Recirculated Sections of the Final REIR, comment deadline 4/10/25
Date: Friday, February 21, 2025 2:20:44 PM
Attachments: image001.png

O1-1

Good afternoon Rowena,

Thank you for providing notice of the Recirculated sections.
The Notice has an error in the SCH #.

O1-2

We will look for the documents on CEQAnet on Monday.

Best regards,
Theresa

From: Rowena Parravano <RParravano@CityofSanteeCa.gov>
Sent: Friday, February 21, 2025 1:14 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Marni Borg <mborg@CityofSanteeCa.gov>; Jamie Bryan <JBryan@CityofSanteeCa.gov>
Subject: Notice of Availability Fanita Second Recirculated Sections of the Final REIR

Hello,
Attached is an electronic version of the Notice of Availability for the Second Recirculated Sections of the Final REIR for Fanita Ranch. You are receiving this communication because you expressed an interest in the Fanita Ranch project.
If you have any questions concerning this project you may contact Sandi Sawa at (619) 258-4100, extension 167 or at ssawa@cityofsanteeca.gov.
Respectfully,
Rowena Parravano

Rowena Parravano
Administrative Secretary
Engineering Department
Planning & Building Department
(619) 258-4100 x 167
rparravano@cityofsanteeca.gov

O1-1: The comment states that the State Clearinghouse number was incorrect in the Notice of Availability. The City of Santee (City) acknowledges this error and has corrected the electronic versions of the Notice of Availability on the City's website and with the State Clearinghouse. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report (EIR) for the Fanita Ranch Project (proposed project). Therefore, no further response is required.

O1-2: The comment states that the documents will be found on CEQAnet. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

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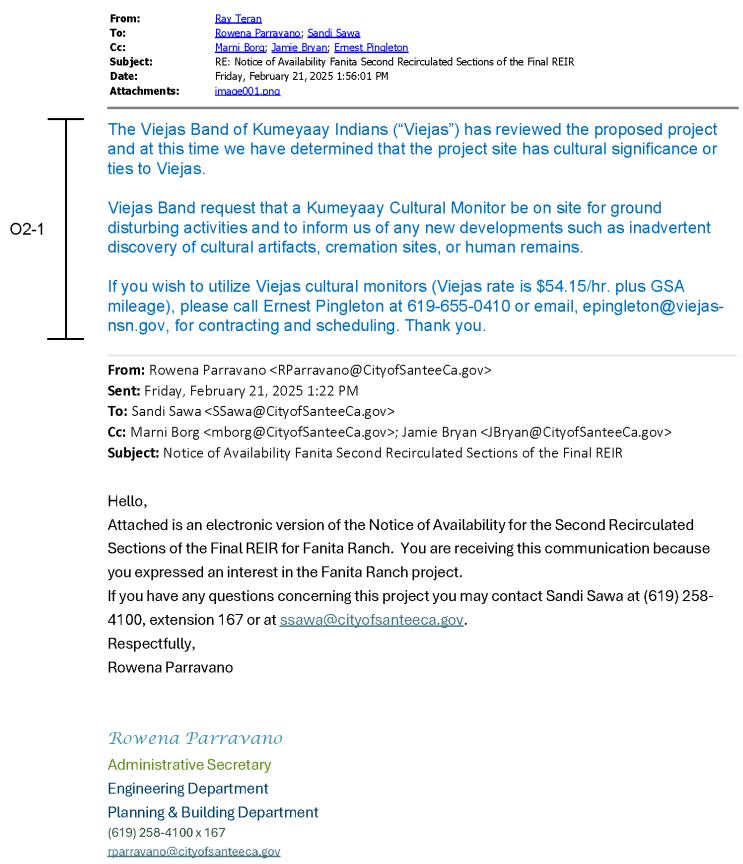
Comment Letter O2: Viejas Band of Kumeyaay Indians, February 21, 2025



From: Ray Teran
To: Rowena Parravano; Sandi Sawa
Cc: Marni Borg; Jamie Bryan; Ernest Pingleton
Subject: RE: Notice of Availability Fanita Second Recirculated Sections of the Final REIR
Date: Friday, February 21, 2025 1:56:01 PM
Attachments: image001.png

O2-1

The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas.

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

If you wish to utilize Viejas cultural monitors (Viejas rate is $54.15/hr. plus GSA mileage), please call Ernest Pingleton at 619-655-0410 or email, epingleton@viejas-nsn.gov, for contracting and scheduling. Thank you.

From: Rowena Parravano <RParravano@CityofSanteeCa.gov>
Sent: Friday, February 21, 2025 1:22 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Marni Borg <mborg@CityofSanteeCa.gov>; Jamie Bryan <JBryan@CityofSanteeCa.gov>
Subject: Notice of Availability Fanita Second Recirculated Sections of the Final REIR

Hello,
Attached is an electronic version of the Notice of Availability for the Second Recirculated Sections of the Final REIR for Fanita Ranch. You are receiving this communication because you expressed an interest in the Fanita Ranch project.
If you have any questions concerning this project you may contact Sandi Sawa at (619) 258-4100, extension 167 or at ssawa@cityofsanteeca.gov.
Respectfully,
Rowena Parravano

Rowena Parravano
Administrative Secretary
Engineering Department
Planning & Building Department
(619) 258-4100 x 167
rparravano@cityofsanteeca.gov

O2

O2-1: The comment states that the Fanita Ranch Project (proposed project) site has cultural significance or ties to the Viejas Band of Kumeyaay Indians (Viejas) and requests that a Viejas cultural monitor be on site for ground-disturbing activities.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter O3: California Chaparral Institute, April 9, 2025

Sandi Sawa, AICP, Director of Planning & Building
City of Santee
10601 Magnolia Avenue
Santee, CA 92071
By Email: ssawa@cityofsanteeca.gov

April 9, 2025

RE: Fanita Ranch - 2nd Recirculated Sections FREIR

Dear Ms. Sawa,

The death and destruction of the Eaton and Palisades Fires in Los Angeles this past winter places an exclamation mark on The California Chaparral Institute's prior warnings not to place 3,000 homes intermixed within the fire-prone terrain of Fanita Ranch.

O3-1

There are 30 confirmed deaths and 16,251 destroyed structures in the Los Angeles wind-driven fires. Over 7,000 of the structures are losses that extended well beyond the Very High Fire Hazard Severity Zone points of origin. California has experienced massive fire destruction over the past two decades despite changes in building codes, better suppression technology, and large investments in fire prevention. However, the development industry has yet to curb its appetite for sprawl developments into increasingly hazardous terrain.

The revised Fanita Ranch project now proposes to double-down upon its denial of reality by introducing the most vulnerable demographic of residents into the most severe fire hazard zone – senior citizens. Deaths in the LA fires (with two disabled exceptions) were all in the over 55-year-old category. The Fanita project proposes Senior Housing for the purpose of evading a "legislative act." A legislative act makes the project clearly subject to a vote by Santee residents.

The Senior Housing designation is a cynical ploy that must be rejected. Placement of a senior population within a designated Very High Fire Hazard Severity Zone with closely spaced units is clearly an avoidable, significant, adverse impact to public safety.

The California Chaparral Institute has endeavored over the past 22 years to assist communities to adapt to California's fire prone environment by using sound planning

www.californiachaparral.org PO Box 545, Escondido, CA 92033

O3

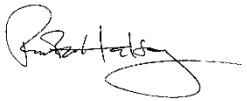
O3-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in a Very High Fire Hazard Severity Zone and cites statistics from the Los Angeles wildfires.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

principles based upon sound scientific research. The proposed project contradicts these principles.

O3-1 cont.

Sincerely,



Richard W. Halsey
nature@californiachaparral.org

Comment Letter O4: Center for Biological Diversity, April 10, 2025

O4

From: Sandi Sawa
To: Marni Borg
Cc: Shawn Hagerty; Amanda Daams; Amy Hoyt
Subject: FW: Comment Letter on REIR for Fanita Ranch
Date: Thursday, April 10, 2025 2:53:03 PM
Attachments: image001.png
2025-04-10 CBD Fanita Ranch REIR Comments.cleaned.pdf
image002.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Meredith Stevenson <mstevenson@biologicaldiversity.org>
Sent: Thursday, April 10, 2025 2:08 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Comment Letter on REIR for Fanita Ranch

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3. Copy the code and return to the attachment recovery page.
4. The email with original attachments will be released to your mailbox.

Please exercise discretion when requesting to release suspicious attachments.

Good afternoon,

Attached please find a letter from the Center for Biological Diversity regarding the REIR for Fanita Ranch. We also sent the letter via FedEx. The references are available here and on a flash drive we sent. Please confirm that you received the letter and were able to download the

references.

Thank you,

Meredith Stevenson
Staff Attorney
Center for Biological Diversity
574-309-5620
mstevenson@biologicaldiversity.org

CENTER for BIOLOGICAL DIVERSITY Because life is good.

April 10, 2025

Sent via email, with references via FTP and FedEx

Sandi Sawa, AICP Director of Planning & Building
Department of Development Services
City Hall, Building 4
10601 Magnolia Avenue
Santee, California 92071
Telephone: (619) 258-4100, extension 167
Email: ssawa@cityofsanteeca.gov

Re: Second Recirculated Sections of the Revised Environmental Impact Report for Fanita Ranch, SCH# 2005061118

Dear Ms. Sawa:

This letter is submitted on behalf of the Center for Biological Diversity (the "Center") regarding the Second Recirculated Revised Environmental Impact Report ("2025 REIR") for Fanita Ranch (the "Project") (State Clearinghouse No. 2005061118). This REIR is the latest environmental document prepared pursuant to the California Environmental Quality Act ("CEQA"), intended to address the deficiencies the San Diego County Superior Court noted in the 2022 First Recirculated REIR for the Project ("2022 REIR").

O4-1

These comments mark the fourth time the Center has commented on the current version of the Project and follow two successful challenges in San Diego County Superior Court. In July 2020, the Center first commented on the Project's Draft EIR, noting inadequate assessment and mitigation of wildfire risks and reiterated those concerns in comments on the Final EIR two months later. The Center then challenged the City's failure to disclose and analyze the Project's wildfire-related hazards in court. In 2022, the court found the 2020 EIR inadequate under CEQA due to the failure to assess evacuation timing under traffic scenarios; explain how the Project would affect residents' abilities to evacuate; and explain the extent to which the Project would expose residents to significant risk of loss, injury, or death.

Alaska . Arizona . California . Colorado . Florida . Hawaii . N.Carolina . New Mexico . New York . Oregon . Washington, D.C. . La Paz, Mexico
P.O. Box 710, Tucson, AZ 85702-0710 tel (520) 623.5252 fax (520) 623.9797 BiologicalDiversity.org

O4-1: This comment is an introductory comment that details the Fanita Ranch Project's (proposed project's) court case history, expresses concern regarding wildfire, and asserts that the 2025 Los Angeles wildfires constitute new information prompting the City of Santee (City) to revise its assessment.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. As discussed in Thematic 2 and Response to Comment O4-2, the 2025 Los Angeles wildfires do not constitute new information requiring additional analysis.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report (EIR) for the proposed project. Therefore, no further response is required.

Following the 2022 opinion, the City revised its wildfire sections in the First Recirculated Sections of the REIR in 2022 (2022 REIR). The Center again commented and successfully challenged the 2022 REIR in court, this time regarding the Project's inconsistencies with the City of Santee's General Plan. The August 2025 court opinion prompted the City to issue this 2025 REIR, which claims that that the Project's 445 Active Adult units would qualify the Project for density bonus benefits under the Density Bonus Law.

O4-1 cont.

However, the 2025 EIR yet again violates CEQA in its wildfire risk assessment. The impact of recent Los Angeles wildfires and challenges with evacuation constitutes new information requiring the City to revise its assessment, especially considering the challenges inherent to evacuating more than 700 older adults from a wildfire. (2020 Draft EIR at 4.13-11.) Additionally, the Los Angeles wildfires provide new information regarding recent wildfire patterns and behavior that requires assessment and further mitigation in a revised EIR.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Santee and throughout San Diego County.

I. The Project Poses Reasonably Foreseeable Wildfire Risks to Older Adults.

O4-2

The City must issue a revised EIR assessing and mitigating the distinct challenges in evacuating a 55+ community alongside thousands of other residents during a wildfire, informed by new information that has become available since the 2022 REIR. CEQA requires a revised EIR or subsequent EIR when significant new information indicates (1) "[a] new significant environmental impact would result from the project"; or (2) "[a] substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance." (Pub. Res. Code § 21166; CEQA Guidelines § 15088.5(a); CEQA Guidelines, § 15162(a)(2), (a)(3)(A), (B).) CEQA specifically provides that "[w]hen an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required . . . [unless] [n]ew

2

O4-2: The comment expresses concern that the proposed project would place senior citizens within a Very High Fire Hazard Severity Zone. The comment likens the proposed project to Pacific Palisades and Altadena, which burned during the January 2025 Los Angeles area wildfires, and claims that this is new information prompting additional California Environmental Quality Act (CEQA) analysis. Further, the comment raises concern regarding new or changing conditions that would require additional analysis in terms of fire impacts related to the proposed project. Please refer to Thematic Response 2, Wildfire Risk, which addresses these claims. In addition, please refer to Thematic Response 1, Recirculation and Scope of Review Claims, in response to requests for revisions to the Final Revised EIR as it pertains to wildfire and evacuation.

information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available." (Pub. Res. Code § 21166(c).) That is the case here.

A. Hundreds of Older Adults Will Reside on the Project Site.

As a threshold matter, the Project undeniably poses wildfire risks to a vulnerable group: the hundreds of older adults that will reside in the Active Adult community. The 2025 REIR states that the 445 Active Adult units will be restricted to age 55+ and claims that this will qualify the Project for density bonus benefits under the Density Bonus Law. (Gov. Code, § 65915(b)(1)(C); Civil Code § 51.3(b)(4) [defining a "senior citizen housing development" as "a residential development developed, substantially rehabilitated, or substantially renovated for, senior citizens that has at least 35 dwelling units"]; Civ. Code, § 51.3(b)(1) [defining "senior citizen" as ages 55+] (2025 REIR, Appendix T at 5.) These 445 units will have about 1.6 residents each, totaling over 700 residents. (2020 EIR at 4.13-11.)

O4-2 cont.

In reality, the Project's Active Adult community will likely attract adults much older than 55. In Virginia, for example, the average age of a 55+ community resident is 84. (Borges, 2024.) In Minneapolis, a similar 55+ community, Becketwood, has an average age of 80, with the average buyer aged 71. (Gagliano, 2018.) And active adult 55+ community developer, Avenida Partners, reports an average age of 74. (Eckstein, 2022.)

B. The Entire Project Site Has Been Updated to a Very High Fire Hazard Severity Zone.

Wildfire evacuations of these older residents, along with thousands of others on the Project site, are reasonably foreseeable, considering new information regarding the Project site's Fire Hazard Severity Zone (FHSZ) (the highest severity level designation). CalFire's updated 2025 maps confirm that a Very High FHSZ now covers the entire Project site, while moderate and high FHSZs now border the Project site. (Cal Fire, 2025.)

Additionally, the Project site remains wildfire-prone, as a total of 15 fires, ranging from 25 acres (un-named 1974 fire) to 280, 278 acres (the 2003 Cedar Fire) have burned through the project site dating back to 1910. (2022 REIR at 4.18-5; 2022 REIR,

Appendix P-1 at 22.) The City even acknowledged in 2022 that "wildfire has occurred and would likely occur in the Project vicinity again." (2022 REIR, EIR Appendix P-1.) The Project fire map further indicates that virtually the entire Project site has been burned at least once, with the vast majority having burned numerous times. (*Id.*, Figure 5.)

C. 55+ Communities Are Statistically More Vulnerable to Wildfire Risks.

Considering these heightened risks, it is critical to take residents' age ranges into account in assessing wildfire hazards on the Project site. CEQA requires the City to "analyze any significant environmental effects the proposed project might cause or risk exacerbating by bringing development and people into the area affected." (Guidelines § 15126.2(a); *see also California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 388.) This includes "any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions [e.g.] . . . wildfire risk areas." (Guidelines, § 15126.2(a) [explaining the types of significant impacts that should be evaluated in an EIR]; *see also* Guidelines § 15065 [EIR must evaluate a project's potential to cause "substantial adverse effects on human beings, either directly or indirectly"].) Locating potentially hundreds of elderly residents, likely aged 70+, in a Very High Fire Hazard Zone certainly could result in "substantial adverse effects."

O4-2 cont.

New information reveals that adults aged 65-74 have 2.3 times the risk of dying in a fire, and from 2013-2022, the 10-year fire death rate trend for this age group increased 45.4%. (U.S. Fire, 2023.) Furthermore, adults aged 75-84 have 2.8 times the risk of dying in a fire, and from 2013-2022 the 10-year fire death rate trend for this age group increased 6%. (U.S. Fire, 2023.)

Recent disasters in the United States since the 2022 REIR further highlight older adults' vulnerability during evacuations. Of the 96 people with identified ages who died in the 2023 Lahaina fire in Hawaii, 72 of them (or 75 percent) were over the age of 60. (Maui Police Department, 2024.) In the recent Los Angeles fires, discussed further below, at least 20 of the 29 deaths were people over 65, and at least 23 of 29 were 55+. (Burke, 2025.) The median age was 77. (Jarvie, 2025.)

II. The Los Angeles Wildfires Provided New Information Regarding the Substantial Risks of Wildfire to Project Residents.

The 2025 REIR also leaves out significant new information from the January 2025 Los Angeles wildfires, including the behavior of these fires and evacuation challenges that arose. Similar to the Project site, both communities evacuated during the Eaton and Palisades fires had high percentages of elderly residents, including 21% of residents in the Eaton Fire zone over age 65 and about 26% impacted by the Palisades Fire. (Lazar, 2025.) And similar to the Project site, the Santa Ana winds contributed to fire danger in affected areas of Los Angeles. As a result, the City must revise the EIR considering Los Angeles' difficulties in evacuating older residents and the behavior of the fires.

O4-2 cont.

A. The Conditions Surrounding the Los Angeles Wildfires Bear Similarities to Conditions at the Project Site.

As explained *supra*, the Project falls in a Very High FHSZ, including "steep topography that can facilitate fire spread" as well as high-velocity Santa Ana winds, which can facilitate fire spread. (2022 REIR at 4.18-15.) These conditions bear similarities to the conditions that gave rise to the January 2025 Eaton Fire and Palisades Fires, the second and third most destructive fires in California history. (Top 20, 2025.) These deadly fires, which destroyed more than 18,000 homes and structures and burned over 57,000 acres, rapidly spread in part due to the Santa Ana winds that also affect the Project site: a climatological phenomenon that regularly occurs in Southern California in the late autumn and winter and could foreseeably contribute to a similarly powerful wildfire on the Project site. (Laskowski, 2025.)

B. A Revised EIR Must Assess Wildfire Risks Considering the Los Angeles Wildfires' Fast-Moving Nature.

Despite these similarities, the 2025 REIR overlooks significant new information regarding the recent Los Angeles wildfires, particularly their fast-moving nature. High Santa Ana winds fuel any ignitions, making fires burn hotter, spread faster and farther, and greatly complicate fire suppression efforts, since deploying air assets like tanker planes and helicopters to spread water and fire retardant can prove difficult. (Laskowski, 2025.) In these conditions, the Eaton fire, burning in the San Gabriel Mountains east of Pasadena, reportedly grew twentyfold in size, from 10 acres to 1000 acres, within just a

few hours, and wildfires on the Project site could grow in a similar manner. (Laskowski, 2025.)

More broadly, the Eaton and Palisades Fires progressed in a manner consistent with recent trends of other fast-moving fires in California. (Thompsen, 2025.) New information reveals that from 2001 to 2020, peak daily growth rate of fires in the U.S. West more than doubled, and in California the average peak growth rate rose 398 percent. (Balch, 2024.) The fast-moving nature of recent fires has contributed to widespread destruction: 78 percent of structures destroyed in fires in the U.S. from 2001-2020 burned in fast-moving fires. (Pappas, 2025.) In fact, a growth rate of more than 4,000 acres in a day serves as one of the most accurate predictors as to whether a fire will cause significant damage to homes and other structures. (Balch, 2024.) In the case of the Los Angeles Fires, the fast-moving fires forced tens of thousands of residents to evacuate, many of whom were forced to abandon their cars and evacuate on foot.

O4-2 cont.

The Los Angeles fires' rapid destruction occurred during conditions that could similarly arise on the Project site: a dry winter in southern California, following a dry fall, following a particularly wet winter. (Pappas, 2025.) In Los Angeles, these conditions created destructive, fast-moving fires, as a wet year increases the growth of highly flammable small shrubs and grasses while a dry year dries out those plants and provides fuel. (Pappas, 2025.) Unusual weather patterns such as this, along with rising temperatures attributable to greenhouse gas emissions, have disrupted natural fire patterns globally and contribute to the likelihood of fast-moving fire on the Project site. (Pappas, 2025.)

The City must revise its 2025 REIR, considering that experts do not expect Santa Ana wind intensity to decline. (Guzman-Morales, 2019.) With fires driven by the Santa Anas, wind blows embers far out ahead of the fast-moving fire front, igniting new fires faster than they can be extinguished. (Pappas, 2025.) As the wet season in southern California continues to yield less rainfall in fall and spring, fire seasons will likely continue to overlap with the typical Santa Ana wind season, increasing the likelihood of a deadly, destructive fire on the Project site similar to the Los Angeles fires. (Pappas, 2025.)

C. The Los Angeles Wildfires Provide Significant New Information Regarding Wildfire Risks to Older Residents.

The Los Angeles fires also provided new information on the significant risks to older adults and all residents from fast-moving wildfires. Nearly a third of those killed in the Eaton fire suffered impairments that affected mobility (Lin, 2025); at least 23/29 of those killed were over the age of 55; and at least 20/29 were over the age of 65. (Burke, 2025.) These deaths have shone a spotlight on Los Angeles County's failure to adequately plan for the evacuation of elderly and disabled residents during wildfires: a failure the revised EIR must address.

1. Many Los Angeles Residents Did Not Receive Correct Evacuation Alerts.

O4-2 cont.

First, a revised EIR must consider that the Los Angeles wireless emergency alert system, similar to the Project's proposed alert system, failed to work correctly during wildfire evacuations and placed all residents, particularly older residents, in danger. (2022 REIR, Appendix P2 at 8-9.) For example, in Altadena, where flames erupted from Eaton Canyon around 6:30 p.m. January 7, neighborhoods on the east side of town received evacuation alerts at 7:26 p.m.; however, west Altadena residents did not receive an evacuation alert until 3:25 a.m. — hours after fires burned through their neighborhoods. (Castleman, 2025.) This emergency alert failure had fatal results: all 17 people that died in the Eaton Fire resided on Altadena's west side. (*Id.*)

This is not the first time wireless alert systems have failed. In 2020, during the LNU Lightning Complex Fire, a coding error prevented cellphone alerts in Napa County from going through. (Jarvie, 2025 [L.A. County's evacuation alert system broke].) The same year, an alert in Sonoma County was sent to a larger area than intended, while another included a hyperlink to an evacuation map for the wrong wildfire. (*Id.*) In the case of the Los Angeles wildfires, the alert system failure resulted in residents hesitating to evacuate, as they trusted in the system. (Castleman, 2025.) Between 2 and 2:30 a.m. near the Eaton Fire, deputies had to drive by with a speaker telling residents to evacuate due to alert failures. (Castleman, 2025.)

Additionally, glitches in the wireless emergency alert system resulted in millions of residents receiving evacuation notices when they were not in evacuation zones. (Nguyen, 2025.) These erroneous notices happened not just once, but twice, creating

panic across the region and distrust of the alert system. (Nguyen, 2025.) In total, these failures proved so significant that the Los Angeles County Board of Supervisors voted for an investigation regarding emergency notifications conducted by an independent third party. (Jarvie, 2025 [Investigation Launched].) Local members of Congress also requested an investigation, including details on the "precise failures" that led to erroneous alerts. (*Id.*)

In the case of the Project, the 2022 REIR explains that the Project's notification system would rely on similar text message/email alerts and would not require the other methods that likely saved many residents during the Los Angeles fires. (2022 REIR, Appendix P2 at 8-9.) These voluntary methods include police cruisers and helicopters with blowhorns, door-to-door notifications, television notifications, and changeable message signs. (2022 REIR, Appendix P2 at 9.) Considering new information, electronic notifications are not sufficient: not only are they prone to error, but they also may not be suited to the Project's older population, which is less likely to receive disaster warnings (Melton, 2023) and may lack access to critical internet communications to monitor fire conditions, preparedness, and evacuation notices. (Melton, 2023; Lin, 2025; Lee et al., 2021; Courtin & Knapp, 2017.)

O4-2 cont.

The City must revise its EIR taking into account the new information regarding the alert system's reliability and suitability for alerting older adults. It should further incorporate the results of the forthcoming Los Angeles County investigations regarding alert system failures into a revised EIR and mitigate accordingly.

2. Some Elderly Residents Were Unwilling to Evacuate.

Relatedly, the revised EIR must consider several reports of older residents refusing to immediately evacuate from the Los Angeles fires. For example, 83-year-old resident, Rodney Nickerson, refused to evacuate and did not survive (CNN, 2025); similarly, 83-year-old Erliene Louise Kelley and 55-year old Randall Lawrence Miod passed away after refusing to evacuate because they had been through similar wildfires before; and Kim Winiecki, 77, and Annette Rossilli, 85, both died after insisting they would be fine staying in their homes. (Burke, 2025.) Arthur Simoneau, 69, also died while attempting to defend his home from the wildfires. (Burke, 2025.)

The Evacuation Plan for the Project does not consider older adults' hesitation to evacuate; rather, it provides plans for a phased evacuation in which those closest to the

wildfire would evacuate first, thereby reducing traffic congestion for the next evacuation phase. (2022 REIR at 4.18-45.) However, even beyond examples from the Los Angeles fires, several studies have noted that the elderly may be less likely to heed disaster warnings than younger persons, which would inevitably interfere with the phased evacuation plan. (Fernandez, 2002; Melton, 2023.) Older adults who have previously experienced disasters may feel that they can survive another in their own home, while others may have difficulties evacuating, or are more isolated from information about the risks of not evacuating. (Fernandez, 2002.) As a result of including 445 units of 55+ housing units, the City must revise its REIR and Evacuation Plan to consider this potential reluctance and mitigate this impact.

3. Elderly Residents Faced Difficulties Evacuating Due to Physical Constraints.

O4-2 cont.

Physical limitations also restricted older residents' abilities to respond or evacuate during the Los Angeles wildfires. As explained *supra*, at least 20 of the 29 who died were over the age of 65, and one third of those who died had a physical impairment that affected mobility. These evacuation difficulties were not unique to the Eaton and Palisades Fires, as physical limitations often pose obstacles for elderly populations, which the revised EIR should consider. (*See* Masri et al., 2021; Melton, 2023.) Specifically, the revised assessment should consider older populations' limited mobility and physical strength, which diminishes the older population's ability to respond to disaster. (Asfaw, 2020.) Older adults may also have increased susceptibility to stress and struggle with the loss of access to supportive individuals and services during a wildfire. (Dostal, 2015.)

4. Evacuation Logistics Posed Evacuation Challenges.

Additionally, evacuation logistics proved challenging during the Los Angeles wildfires. Many elderly people have limited assistance and inadequate transportation (Asfaw, 2020; Winkler, 2025), and in the case of the Los Angeles fires, the city and county had no registry for disabled residents. (Jarvie, 2025.) This inadequate planning forced the Disability Community Resources Center to step in to assist with evacuations by calling Ubers and Lyfts, and even autonomous vehicles, to pick up disabled and older residents. (Jarvie, 2025.) Meanwhile, neighbors struggled to find cars that could accommodate disabled residents to help them evacuate. (Jarvie, 2025.) In response, disability advocates are currently urging Los Angeles County to make significant strides

in emergency planning for disabled and older people during wildfire evacuations. (Jarvie, 2025.) The revised EIR should do the same.

Additionally, the health challenges older adults faced during evacuation did not end once they evacuated. Numerous accounts of norovirus spreading in Los Angeles shelters posed further hurdles in recovery. (Christensen, 2025.) Disease spread is a common challenge for older residents during evacuations, as they are more prone to illness-related complications immediately following evacuations. (Asfaw, 2020; Dostal, 2015.) The City must revise its REIR considering disease spread following the Los Angeles fires to ensure that these issues are mitigated after evacuating older adults and other residents from the Project site.

5. Managing and Organizing Older Evacuees Following Initial Evacuation Posed Barriers in Los Angeles.

O4-2 cont.

The mass evacuation of care-dependent residents, mostly over age 65, also created immediate health risks following the Los Angeles fires and stretched public health officials' coordination capabilities to their limits. (Schrank, 2025.) Responders lacked basic supplies like gloves and hand sanitizer, and struggled to provide cots, medical supplies, and care for streams of incoming elderly evacuees. (Lopez, 2025; Schrank, 2025.) Many evacuees required assistance with personal hygiene and had to wait for long periods of time for a volunteer. (Lopez, 2025.) And since evacuating, older residents have continued to struggle to recover emotionally and financially from losing their homes. (Davis, 2025.)

Despite this new information, the 2022 REIR admits no health services will be immediately available following evacuations from the Project: rather, shelters would provide only basic needs such as food, water, and restrooms. (2022 REIR at 4.18-34.) Nowhere does the Evacuation Plan or the 2022 REIR consider the medical risks to more than 700 elderly residents evacuating at once among thousands of other residents or provide details as to how medical services will be provided.

This is a critical omission that must be assessed and mitigated. Beyond the Los Angeles fires, older adults' difficulties following any evacuation are often compounded by a lack of access to prescription medication, healthcare providers, and mental health services. (Melton, 2023.) For example, Fernandez et al. (2002) observed that elderly people who were evacuated in advance of hurricanes in the United States faced

difficulties after arriving at shelters and nursing homes without care instructions or medical records. (Fernandez, 2002.) Due to higher prevalence of chronic conditions, older adults often require specialized diets, medicine, and other medical treatments which can be more difficult to maintain or access following the trauma and disruptions caused by natural disasters. (Melton, 2023; Winkler, 2025; Asfaw et al., 2020.)

6. Wildfire Smoke Posed Heightened Health Risks to Elderly Residents.

Relatedly, many evacuees from the Los Angeles wildfires suffered from wildfire smoke inhalation, an impact missing from the 2022 REIR. In fact, the wildfires coincided with a 16-fold rise in hospital visits for fire-related injuries, such as burns and smoke exposure. (Briscoe, 2025.) This is unsurprising, considering wildfires lead to increased PM2.5 and decreased air quality—increasing the odds of respiratory and health concerns such as burning eyes, runny nose, scratchy throat, headaches, respiratory illness, and exacerbation of pre-existing conditions such as asthma and COPD. (Melton, 2023.) Breathing wildfire smoke is associated with increased outpatient visits, emergency visits, hospitalization, and death from a myriad of respiratory issues. (Melton, 2023.)

O4-2 cont.

As described *supra*, new information explains that older adults are more likely to live with underlying chronic diseases and are especially susceptible to short-term and long-term health effects of wildfire smoke. (Melton, 2023.) Experts warn that prolonged exposure to wildfire smoke, which contains toxic chemicals and fine particulate matter, can exacerbate existing respiratory conditions and contribute to new, long-term health issues. (Zacarias, 2025.) Nowhere does the 2022 REIR or Evacuation Plan even mention these risks, let alone provide plans for getting older populations into cleaner air.

In sum, the new information regarding evacuation challenges requires the City to revise its EIR and evacuation plan to consider risks to Project residents, particularly the more than 700 55+ residents on the Project site. The EIR's emergency response plans must be designed to meet the older population's needs, and emergency and fire management personnel should coordinate with local organizations that focus on caring for older people. Mitigation could include integrating wildfire adaptation programs into aging services programs; services that could help older people with mitigation work (e.g., clearing brush around the home, etc.); or developing emergency response plans that recognize potential physical, communications, and transportation limitations that older people may face in an evacuation. (Melton, 2023.)

III. The 2025 REIR Leaves Out Other New Information on Wildfires in California.

The 2025 REIR also fails to take into account additional new information on increased wildfire risks in California. The 2022 REIR concluded that "[i]mplementation of the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fire." (2022 REIR at 4.18-35.) But the analysis supporting this conclusion is no longer sufficient, as new information indicates heightened risk.

O4-2 cont.

First, new information generally provides that wildfire risks have only grown in recent years. Human-induced climate change has accelerated impacts of extreme weather events, including but not limited to, increases in areas burned in wildfires. (Melton, 2023.) From 2016-2023, wildfires killed more than 200 people in California, burned down more than 50,000 structures, spurred hundreds of thousands to evacuate their homes, and exposed millions to unhealthy levels of smoke and air pollution. (CalFire, 2023.)[1] The majority were ignited by human activity: for example, electrical transmission lines and electrical equipment caused the 2020 Silverado and Zogg Fires, vehicle sparks started the 2020 Apple Fire, pyrotechnics at a gender-reveal celebration started the 2020 El Dorado Fire, and a house fire likely ignited the 2020 Blue Ridge Fire. As a result, placing more homes and people in very high fire-prone areas such as the Project site undoubtedly increases the likelihood of these ignition sources.

Second, new studies emphasize the severity of health risks from wildfire. For example, wildfires place local communities at higher risk of increased occurrences of poor outdoor and indoor air quality from $PM_{2.5}$ from smoke, which can have both acute and long-term health effects that disproportionately affect vulnerable populations, like children, the elderly, those with underlying chronic disease, low-income communities, and communities of color. (Reid-Wainscoat et al., 2024.) In addition, epidemiologists recently found that increased exposure to wildfire smoke may also be linked to higher rates of dementia. (B. Zhang et al., 2023; Z. Zhang et al., 2023.) Researchers further estimate that between 2008 and 2018 California wildfire smoke caused more than 50,000 premature deaths. (Connolly et al., 2024.)

[1] These data are from annual CalFire Incident Reports, available at https://www.fire.ca.gov/incidents.

O4-2 cont.

Third, new information since 2022 sheds light on the costs of wildfires for state and local authorities. Fire suppression costs in areas managed by the California Department of Forestry and Fire (Cal Fire) have skyrocketed from $114 million in the 2000-2001 fiscal year to close to $3 billion for the 2020-2021 and 2021-2022 fiscal years combined. (CalFire, 2022.) During the 2022-2023 fiscal year, CalFire used an estimated $3.3 billion for wildfire protection and suppression. (LAO, 2023.) This does not include the cost of lives lost, property damage, or clean up.

And finally, firefighters have become increasingly strained and over-burdened due to recent extreme weather and fire conditions, which, in combination with poorly planned development, has led to more ignitions and longer fire seasons. Wildland firefighters suffer disproportionately high rates of cancer and other serious diseases, likely due to extreme smoke exposure. (Hwang et al., 2023; Johnson & Lam, 2023.) In addition, the physical and mental fatigue of endlessly fighting fires and experiencing trauma have spurred new reports indicating rising rates of suicide and substance abuse among firefighters. (Cart, 2022.) The revised EIR must assess these impacts and include appropriate mitigation.

IV. The Project Remains Inconsistent with the General Plan.

O4-3

The Project remains inconsistent with the applicable General Plan policies that guide development on the site. These include, but are not limited to, minimum lot size requirements, including a lake or golf course and a dedicated sports park, and including a Development Agreement. The Project's inclusion of 445 "Active Adult" units does not qualify the Project for the State Density Bonus Law, and, even if it did, the State Density Bonus Law does not require or authorize cities and counties to waive or ignore all applicable general plan policies with which a proposed project is inconsistent. Accordingly, if the City wishes to approve the Project as proposed, it should do so by way of an amendment to the General Plan, and should accordingly put the decision to a vote of the citizens of Santee, as required by Measure M.

V. Conclusion

O4-4

Thank you for the opportunity to submit comments on the 2025 REIR for Fanita Ranch. We urge the City to prepare a new EIR for the Project that fully complies with CEQA and recirculate the revised EIR. Because significant new information has become available, the City must reevaluate and incorporate this information, as well as new

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O4-3: The comment states that the proposed project remains inconsistent with the Santee General Plan. Section 4.10, Land Use and Planning, of the Second Recirculated Sections of the Final Revised EIR discusses the proposed project's consistencies and inconsistencies with the Santee General Plan Guiding Principles for the project site. As discussed, the proposed project does not meet the exact requirements of Guiding Principles 3 (lot size), 9 (golf course or recreational facility), and 14(e) (development agreement). However, mere inconsistency with a plan, policy, or regulation does not mandate a significance finding. The conflict must "cause a significant environmental impact" due to a conflict with a policy or regulation "adopted for the purpose of avoiding or mitigating an environmental effect" (California Public Resources Code, Section 21083; CEQA Guidelines, Section 15063[a]). Therefore, the analysis of local land use plans, including the Santee General Plan, concluded that the proposed project would generally not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant. Moreover, as discussed in Section 4.10 of the Second Recirculated Sections, the application of waivers through the state Density Bonus Law and the Essential Housing Program eliminates any inconsistency between the proposed

project and the Santee General Plan Guiding Principles referenced above.

O4-4: This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

research and studies on the Project's impacts that have become available in the last few years.

Given the possibility that the Center will be required to pursue legal remedies in order to ensure that the City complies with its legal obligations including those arising under CEQA, we would like to remind the City of its statutory duty to maintain and preserve all documents and communications that may constitute part of the "administrative record" of this proceeding. (§ 21167.6(e); *Golden Door Properties, LLC v. Superior Court* (2020) 53 Cal.App.5th 733, 762.) The administrative record encompasses any and all documents and communications that relate to any and all actions taken by the City with respect to the Project, and includes "pretty much everything that ever came near a proposed [project] or [] the agency's compliance with CEQA . . . ." (*County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.) The administrative record further includes all correspondence, emails, and text messages sent to or received by the City's representatives or employees, that relate to the Project, including any correspondence, emails, and text messages sent between the City's representatives or employees and the Applicant's representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the City (1) suspend all data destruction policies; and (2) preserve all relevant hardware unless an exact replica of each file is made.

O4-4 cont.

Please add the Center to your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the email listed below.

Sincerely,

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Comment Letter O5: Endangered Habitats League, April 11, 2025

From: Sandi Sawa
To: Marni Borg
Subject: Fw: Second Recirculated Sections of the Revised Environmental Impact Report for Fanita Ranch, SCH# 2005061118
Date: Monday, April 14, 2025 5:57:39 AM
Attachments: 2025-04-10 CBD Fanita Ranch Draft REIR Comments.pdf

From: Dan Silver <dsilverla@me.com>
Sent: Friday, April 11, 2025 1:28:06 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Peter Broderick <pbroderick@biologicaldiversity.org>
Subject: Second Recirculated Sections of the Revised Environmental Impact Report for Fanita Ranch, SCH# 2005061118

April 11, 2025

Sandi Sawa, AICP Director of Planning & Building
Department of Development Services
City Hall, Building 4
10601 Magnolia Avenue
Santee, CA 92071

Re: Second Recirculated Sections of the Revised Environmental Impact Report for Fanita Ranch, SCH# 2005061118

Dear Ms. Sawa:

O5-1

Endangered Habitats League (EHL) wishes to comment on the Second Recirculated EIR by incorporating by reference the letter dated April 10, 2025 from the Center for Biological Diversity to the City (PDF titled "2025-04-10 CBD Fanita Ranch Draft REIR Comments"). EHL endorses and reiterates these comments (also enclosed).

Your confirmation of receipt via return e-mail is requested and appreciated.

Yours truly,
Dan Silver

Dan Silver, Executive Director
Endangered Habitats League
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O5

O5-1: The comment states that the Endangered Habitats League endorses the letter dated April 10, 2025, from the Center for Biological Diversity to the City of Santee and reiterates those comments.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk, as well as Responses to Comments O4-1 through O4-4. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

CENTER for BIOLOGICAL DIVERSITY Because life is good.

April 10, 2025

Sent via email, with references via FTP and FedEx

Sandi Sawa, AICP Director of Planning & Building
Department of Development Services
City Hall, Building 4
10601 Magnolia Avenue
Santee, California 92071
Telephone: (619) 258-4100, extension 167
Email: ssawa@cityofsanteeca.gov

Re: Second Recirculated Sections of the Revised Environmental Impact Report for Fanita Ranch, SCH# 2005061118

Dear Ms. Sawa:

This letter is submitted on behalf of the Center for Biological Diversity (the "Center") regarding the Second Recirculated Revised Environmental Impact Report ("2025 REIR") for Fanita Ranch (the "Project") (State Clearinghouse No. 2005061118). This REIR is the latest environmental document prepared pursuant to the California Environmental Quality Act ("CEQA"), intended to address the deficiencies the San Diego County Superior Court noted in the 2022 First Recirculated REIR for the Project ("2022 REIR").

These comments mark the fourth time the Center has commented on the current version of the Project and follow two successful challenges in San Diego County Superior Court. In July 2020, the Center first commented on the Project's Draft EIR, noting inadequate assessment and mitigation of wildfire risks and reiterated those concerns in comments on the Final EIR two months later. The Center then challenged the City's failure to disclose and analyze the Project's wildfire-related hazards in court. In 2022, the court found the 2020 EIR inadequate under CEQA due to the failure to assess evacuation timing under traffic scenarios; explain how the Project would affect residents' abilities to evacuate; and explain the extent to which the Project would expose residents to significant risk of loss, injury, or death.

Alaska . Arizona . California . Colorado . Florida . Hawaii . N.Carolina . New Mexico . New York . Oregon . Washington, D.C. . La Paz, Mexico
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Following the 2022 opinion, the City revised its wildfire sections in the First Recirculated Sections of the REIR in 2022 (2022 REIR). The Center again commented and successfully challenged the 2022 REIR in court, this time regarding the Project's inconsistencies with the City of Santee's General Plan. The August 2025 court opinion prompted the City to issue this 2025 REIR, which claims that that the Project's 445 Active Adult units would qualify the Project for density bonus benefits under the Density Bonus Law.

However, the 2025 EIR yet again violates CEQA in its wildfire risk assessment. The impact of recent Los Angeles wildfires and challenges with evacuation constitutes new information requiring the City to revise its assessment, especially considering the challenges inherent to evacuating more than 700 older adults from a wildfire. (2020 Draft EIR at 4.13-11.) Additionally. the Los Angeles wildfires provide new information regarding recent wildfire patterns and behavior that requires assessment and further mitigation in a revised EIR.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science. policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Santee and throughout San Diego County.

I. The Project Poses Reasonably Foreseeable Wildfire Risks to Older Adults.

The City must issue a revised EIR assessing and mitigating the distinct challenges in evacuating a 55− community alongside thousands of other residents during a wildfire, informed by new information that has become available since the 2022 REIR. CEQA requires a revised EIR or subsequent EIR when significant new information indicates (1) "[a] new significant environmental impact would result from the project"; or (2) "[a] substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance." (Pub. Res. Code § 21166; CEQA Guidelines § 15088.5(a); CEQA Guidelines. § 15162(a)(2). (a)(3)(A). (B).) CEQA specifically provides that "[w]hen an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required . . . |unless| |n|ew

information, which was not known and could not have been known at the time the environmental impact report was certified as complete. becomes available." (Pub. Res. Code § 21166(c).) That is the case here.

A. Hundreds of Older Adults Will Reside on the Project Site.

As a threshold matter. the Project undeniably poses wildfire risks to a vulnerable group: the hundreds of older adults that will reside in the Active Adult community. The 2025 REIR states that the 445 Active Adult units will be restricted to age 55− and claims that this will qualify the Project for density bonus benefits under the Density Bonus Law. (Gov. Code, § 65915(b)(1)(C); Civil Code § 51.3(b)(4) [defining a "senior citizen housing development" as "a residential development developed, substantially rehabilitated, or substantially renovated for. senior citizens that has at least 35 dwelling units"]; Civ. Code, § 51.3(b)(1) [defining "senior citizen" as ages 551] (2025 REIR, Appendix T at 5.) These 445 units will have about 1.6 residents each, totaling over 700 residents. (2020 EIR at 4.13-11.)

In reality, the Project's Active Adult community will likely attract adults much older than 55. In Virginia, for example, the average age of a 551 community resident is 84. (Borges, 2024.) In Minneapolis, a similar 55− community, Becketwood, has an average age of 80, with the average buyer aged 71. (Gagliano, 2018.) And active adult 55 community developer, Avenida Partners, reports an average age of 74. (Eckstein, 2022.)

B. The Entire Project Site Has Been Updated to a Very High Fire Hazard Severity Zone.

Wildfire evacuations of these older residents, along with thousands of others on the Project site, are reasonably foreseeable, considering new information regarding the Project site's Fire Hazard Severity Zone (FHSZ) (the highest severity level designation). CalFire's updated 2025 maps confirm that a Very High FHSZ now covers the entire Project site, while moderate and high FHSZs now border the Project site. (Cal Fire, 2025.)

Additionally, the Project site remains wildfire-prone, as a total of 15 fires, ranging from 25 acres (un-named 1974 fire) to 280, 278 acres (the 2003 Cedar Fire) have burned through the project site dating back to 1910. (2022 REIR at 4.18-5; 2022 REIR,

Appendix P-1 at 22.) The City even acknowledged in 2022 that "wildfire has occurred and would likely occur in the Project vicinity again." (2022 REIR, EIR Appendix P-1.) The Project fire map further indicates that virtually the entire Project site has been burned at least once, with the vast majority having burned numerous times. (*Id.*, Figure 5.)

C. 55+ Communities Are Statistically More Vulnerable to Wildfire Risks.

Considering these heightened risks, it is critical to take residents' age ranges into account in assessing wildfire hazards on the Project site. CEQA requires the City to "analyze any significant environmental effects the proposed project might cause or risk exacerbating by bringing development and people into the area affected." (Guidelines § 15126.2(a); *see also California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 388.) This includes "any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions [e.g.] . . . wildfire risk areas." (Guidelines, § 15126.2(a) [explaining the types of significant impacts that should be evaluated in an EIR]; *see also* Guidelines § 15065 [EIR must evaluate a project's potential to cause "substantial adverse effects on human beings, either directly or indirectly"].) Locating potentially hundreds of elderly residents, likely aged 70+, in a Very High Fire Hazard Zone certainly could result in "substantial adverse effects."

New information reveals that adults aged 65-74 have 2.3 times the risk of dying in a fire, and from 2013-2022, the 10-year fire death rate trend for this age group increased 45.4%. (U.S. Fire, 2023.) Furthermore, adults aged 75-84 have 2.8 times the risk of dying in a fire, and from 2013-2022 the 10-year fire death rate trend for this age group increased 6%. (U.S. Fire, 2023.)

Recent disasters in the United States since the 2022 REIR further highlight older adults' vulnerability during evacuations. Of the 96 people with identified ages who died in the 2023 Lahaina fire in Hawaii, 72 of them (or 75 percent) were over the age of 60. (Maui Police Department, 2024.) In the recent Los Angeles fires, discussed further below, at least 20 of the 29 deaths were people over 65, and at least 23 of 29 were 55+. (Burke, 2025.) The median age was 77. (Jarvie, 2025.)

II. The Los Angeles Wildfires Provided New Information Regarding the Substantial Risks of Wildfire to Project Residents.

The 2025 REIR also leaves out significant new information from the January 2025 Los Angeles wildfires, including the behavior of these fires and evacuation challenges that arose. Similar to the Project site, both communities evacuated during the Eaton and Palisades fires had high percentages of elderly residents, including 21% of residents in the Eaton Fire zone over age 65 and about 26% impacted by the Palisades Fire. (Lazar, 2025.) And similar to the Project site, the Santa Ana winds contributed to fire danger in affected areas of Los Angeles. As a result, the City must revise the EIR considering Los Angeles' difficulties in evacuating older residents and the behavior of the fires.

A. The Conditions Surrounding the Los Angeles Wildfires Bear Similarities to Conditions at the Project Site.

As explained *supra*, the Project falls in a Very High FHSZ, including "steep topography that can facilitate fire spread" as well as high-velocity Santa Ana winds, which can facilitate fire spread. (2022 REIR at 4.18-15.) These conditions bear similarities to the conditions that gave rise to the January 2025 Eaton Fire and Palisades Fires, the second and third most destructive fires in California history. (Top 20, 2025.) These deadly fires, which destroyed more than 18,000 homes and structures and burned over 57,000 acres, rapidly spread in part due to the Santa Ana winds that also affect the Project site: a climatological phenomenon that regularly occurs in Southern California in the late autumn and winter and could foreseeably contribute to a similarly powerful wildfire on the Project site. (Laskowski, 2025.)

B. A Revised EIR Must Assess Wildfire Risks Considering the Los Angeles Wildfires' Fast-Moving Nature.

Despite these similarities, the 2025 REIR overlooks significant new information regarding the recent Los Angeles wildfires, particularly their fast-moving nature. High Santa Ana winds fuel any ignitions, making fires burn hotter, spread faster and farther, and greatly complicate fire suppression efforts, since deploying air assets like tanker planes and helicopters to spread water and fire retardant can prove difficult. (Laskowski, 2025.) In these conditions, the Eaton fire, burning in the San Gabriel Mountains east of Pasadena, reportedly grew twentyfold in size, from 10 acres to 1000 acres, within just a

few hours, and wildfires on the Project site could grow in a similar manner. (Laskowski, 2025.)

More broadly, the Eaton and Palisades Fires progressed in a manner consistent with recent trends of other fast-moving fires in California. (Thompsen, 2025.) New information reveals that from 2001 to 2020, peak daily growth rate of fires in the U.S. West more than doubled, and in California the average peak growth rate rose 398 percent. (Balch, 2024.) The fast-moving nature of recent fires has contributed to widespread destruction: 78 percent of structures destroyed in fires in the U.S. from 2001-2020 burned in fast-moving fires. (Pappas, 2025.) In fact, a growth rate of more than 4,000 acres in a day serves as one of the most accurate predictors as to whether a fire will cause significant damage to homes and other structures. (Balch, 2024.) In the case of the Los Angeles Fires, the fast-moving fires forced tens of thousands of residents to evacuate, many of whom were forced to abandon their cars and evacuate on foot.

The Los Angeles fires' rapid destruction occurred during conditions that could similarly arise on the Project site: a dry winter in southern California, following a dry fall, following a particularly wet winter. (Pappas, 2025.) In Los Angeles, these conditions created destructive, fast-moving fires, as a wet year increases the growth of highly flammable small shrubs and grasses while a dry year dries out those plants and provides fuel. (Pappas, 2025.) Unusual weather patterns such as this, along with rising temperatures attributable to greenhouse gas emissions, have disrupted natural fire patterns globally and contribute to the likelihood of fast-moving fire on the Project site. (Pappas, 2025.)

The City must revise its 2025 REIR, considering that experts do not expect Santa Ana wind intensity to decline. (Guzman-Morales, 2019.) With fires driven by the Santa Anas, wind blows embers far out ahead of the fast-moving fire front, igniting new fires faster than they can be extinguished. (Pappas, 2025.) As the wet season in southern California continues to yield less rainfall in fall and spring, fire seasons will likely continue to overlap with the typical Santa Ana wind season, increasing the likelihood of a deadly, destructive fire on the Project site similar to the Los Angeles fires. (Pappas, 2025.)

C. The Los Angeles Wildfires Provide Significant New Information Regarding Wildfire Risks to Older Residents.

The Los Angeles fires also provided new information on the significant risks to older adults and all residents from fast-moving wildfires. Nearly a third of those killed in the Eaton fire suffered impairments that affected mobility (Lin. 2025); at least 23/29 of those killed were over the age of 55; and at least 20/29 were over the age of 65. (Burke. 2025.) These deaths have shone a spotlight on Los Angeles County's failure to adequately plan for the evacuation of elderly and disabled residents during wildfires: a failure the revised EIR must address.

1. Many Los Angeles Residents Did Not Receive Correct Evacuation Alerts.

First, a revised EIR must consider that the Los Angeles wireless emergency alert system, similar to the Project's proposed alert system, failed to work correctly during wildfire evacuations and placed all residents, particularly older residents, in danger. (2022 REIR, Appendix P2 at 8-9.) For example, in Altadena, where flames erupted from Eaton Canyon around 6:30 p.m. January 7, neighborhoods on the east side of town received evacuation alerts at 7:26 p.m.; however, west Altadena residents did not receive an evacuation alert until 3:25 a.m. — hours after fires burned through their neighborhoods. (Castleman. 2025.) This emergency alert failure had fatal results: all 17 people that died in the Eaton Fire resided on Altadena's west side. (*Id.*)

This is not the first time wireless alert systems have failed. In 2020, during the LNU Lightning Complex Fire, a coding error prevented cellphone alerts in Napa County from going through. (Jarvie. 2025 [L.A. County's evacuation alert system broke].) The same year, an alert in Sonoma County was sent to a larger area than intended, while another included a hyperlink to an evacuation map for the wrong wildfire. (*Id.*) In the case of the Los Angeles wildfires, the alert system failure resulted in residents hesitating to evacuate, as they trusted in the system. (Castleman, 2025.) Between 2 and 2:30 a.m. near the Eaton Fire, deputies had to drive by with a speaker telling residents to evacuate due to alert failures. (Castleman, 2025.)

Additionally, glitches in the wireless emergency alert system resulted in millions of residents receiving evacuation notices when they were not in evacuation zones. (Nguyen, 2025.) These erroneous notices happened not just once, but twice, creating

panic across the region and distrust of the alert system. (Nguyen, 2025.) In total, these failures proved so significant that the Los Angeles County Board of Supervisors voted for an investigation regarding emergency notifications conducted by an independent third party. (Jarvie, 2025 [Investigation Launched].) Local members of Congress also requested an investigation, including details on the "precise failures" that led to erroneous alerts. (*Id.*)

In the case of the Project, the 2022 REIR explains that the Project's notification system would rely on similar text message/email alerts and would not require the other methods that likely saved many residents during the Los Angeles fires. (2022 REIR, Appendix P2 at 8-9.) These voluntary methods include police cruisers and helicopters with blowhorns, door-to-door notifications, television notifications, and changeable message signs. (2022 REIR, Appendix P2 at 9.) Considering new information, electronic notifications are not sufficient: not only are they prone to error, but they also may not be suited to the Project's older population, which is less likely to receive disaster warnings (Melton, 2023) and may lack access to critical internet communications to monitor fire conditions, preparedness, and evacuation notices. (Melton, 2023; Lin, 2025; Lee et al., 2021; Courtin & Knapp, 2017.)

The City must revise its EIR taking into account the new information regarding the alert system's reliability and suitability for alerting older adults. It should further incorporate the results of the forthcoming Los Angeles County investigations regarding alert system failures into a revised EIR and mitigate accordingly.

2. Some Elderly Residents Were Unwilling to Evacuate.

Relatedly, the revised EIR must consider several reports of older residents refusing to immediately evacuate from the Los Angeles fires. For example, 83-year-old resident, Rodney Nickerson, refused to evacuate and did not survive (CNN, 2025); similarly, 83-year-old Erliene Louise Kelley and 55-year old Randall Lawrence Miod passed away after refusing to evacuate because they had been through similar wildfires before; and Kim Winiecki, 77, and Annette Rossilli, 85, both died after insisting they would be fine staying in their homes. (Burke, 2025.) Arthur Simoneau, 69, also died while attempting to defend his home from the wildfires. (Burke, 2025.)

The Evacuation Plan for the Project does not consider older adults' hesitation to evacuate; rather, it provides plans for a phased evacuation in which those closest to the

wildfire would evacuate first, thereby reducing traffic congestion for the next evacuation phase. (2022 REIR at 4.18-45.) However, even beyond examples from the Los Angeles fires, several studies have noted that the elderly may be less likely to heed disaster warnings than younger persons, which would inevitably interfere with the phased evacuation plan. (Fernandez. 2002; Melton, 2023.) Older adults who have previously experienced disasters may feel that they can survive another in their own home, while others may have difficulties evacuating, or are more isolated from information about the risks of not evacuating. (Fernandez, 2002.) As a result of including 445 units of 55− housing units, the City must revise its REIR and Evacuation Plan to consider this potential reluctance and mitigate this impact.

3. Elderly Residents Faced Difficulties Evacuating Due to Physical Constraints.

Physical limitations also restricted older residents' abilities to respond or evacuate during the Los Angeles wildfires. As explained *supra*, at least 20 of the 29 who died were over the age of 65, and one third of those who died had a physical impairment that affected mobility. These evacuation difficulties were not unique to the Eaton and Palisades Fires, as physical limitations often pose obstacles for elderly populations, which the revised EIR should consider. (*See* Masri et al., 2021; Melton, 2023.) Specifically, the revised assessment should consider older populations' limited mobility and physical strength, which diminishes the older population's ability to respond to disaster. (Asfaw, 2020.) Older adults may also have increased susceptibility to stress and struggle with the loss of access to supportive individuals and services during a wildfire. (Dostal, 2015.)

4. Evacuation Logistics Posed Evacuation Challenges.

Additionally, evacuation logistics proved challenging during the Los Angeles wildfires. Many elderly people have limited assistance and inadequate transportation (Asfaw, 2020; Winkler, 2025), and in the case of the Los Angeles fires, the city and county had no registry for disabled residents. (Jarvie, 2025.) This inadequate planning forced the Disability Community Resources Center to step in to assist with evacuations by calling Ubers and Lyfts, and even autonomous vehicles, to pick up disabled and older residents. (Jarvie. 2025.) Meanwhile, neighbors struggled to find cars that could accommodate disabled residents to help them evacuate. (Jarvie, 2025.) In response, disability advocates are currently urging Los Angeles County to make significant strides

in emergency planning for disabled and older people during wildfire evacuations. (Jarvie, 2025.) The revised EIR should do the same.

Additionally, the health challenges older adults faced during evacuation did not end once they evacuated. Numerous accounts of norovirus spreading in Los Angeles shelters posed further hurdles in recovery. (Christensen, 2025.) Disease spread is a common challenge for older residents during evacuations, as they are more prone to illness-related complications immediately following evacuations. (Asfaw, 2020; Dostal, 2015.) The City must revise its REIR considering disease spread following the Los Angeles fires to ensure that these issues are mitigated after evacuating older adults and other residents from the Project site.

5. Managing and Organizing Older Evacuees Following Initial Evacuation Posed Barriers in Los Angeles.

The mass evacuation of care-dependent residents, mostly over age 65, also created immediate health risks following the Los Angeles fires and stretched public health officials' coordination capabilities to their limits. (Schrank, 2025.) Responders lacked basic supplies like gloves and hand sanitizer, and struggled to provide cots, medical supplies, and care for streams of incoming elderly evacuees. (Lopez, 2025; Schrank, 2025.) Many evacuees required assistance with personal hygiene and had to wait for long periods of time for a volunteer. (Lopez, 2025.) And since evacuating, older residents have continued to struggle to recover emotionally and financially from losing their homes. (Davis, 2025.)

Despite this new information, the 2022 REIR admits no health services will be immediately available following evacuations from the Project: rather, shelters would provide only basic needs such as food, water, and restrooms. (2022 REIR at 4.18-34.) Nowhere does the Evacuation Plan or the 2022 REIR consider the medical risks to more than 700 elderly residents evacuating at once among thousands of other residents or provide details as to how medical services will be provided.

This is a critical omission that must be assessed and mitigated. Beyond the Los Angeles fires, older adults' difficulties following any evacuation are often compounded by a lack of access to prescription medication, healthcare providers, and mental health services. (Melton, 2023.) For example, Fernandez et al. (2002) observed that elderly people who were evacuated in advance of hurricanes in the United States faced

difficulties after arriving at shelters and nursing homes without care instructions or medical records. (Fernandez, 2002.) Due to higher prevalence of chronic conditions, older adults often require specialized diets, medicine, and other medical treatments which can be more difficult to maintain or access following the trauma and disruptions caused by natural disasters. (Melton, 2023; Winkler, 2025; Asfaw et al., 2020.)

6. Wildfire Smoke Posed Heightened Health Risks to Elderly Residents.

Relatedly, many evacuees from the Los Angeles wildfires suffered from wildfire smoke inhalation, an impact missing from the 2022 REIR. In fact, the wildfires coincided with a 16-fold rise in hospital visits for fire-related injuries, such as burns and smoke exposure. (Briscoe, 2025.) This is unsurprising, considering wildfires lead to increased PM2.5 and decreased air quality – increasing the odds of respiratory and health concerns such as burning eyes, runny nose, scratchy throat, headaches, respiratory illness, and exacerbation of pre-existing conditions such as asthma and COPD. (Melton, 2023.) Breathing wildfire smoke is associated with increased outpatient visits, emergency visits, hospitalization, and death from a myriad of respiratory issues. (Melton, 2023.)

As described *supra*, new information explains that older adults are more likely to live with underlying chronic diseases and are especially susceptible to short-term and long-term health effects of wildfire smoke. (Melton, 2023.) Experts warn that prolonged exposure to wildfire smoke, which contains toxic chemicals and fine particulate matter, can exacerbate existing respiratory conditions and contribute to new, long-term health issues. (Zacarias, 2025.) Nowhere does the 2022 REIR or Evacuation Plan even mention these risks, let alone provide plans for getting older populations into cleaner air.

In sum, the new information regarding evacuation challenges requires the City to revise its EIR and evacuation plan to consider risks to Project residents, particularly the more than 700 55+ residents on the Project site. The EIR's emergency response plans must be designed to meet the older population's needs, and emergency and fire management personnel should coordinate with local organizations that focus on caring for older people. Mitigation could include integrating wildfire adaptation programs into aging services programs; services that could help older people with mitigation work (e.g., clearing brush around the home, etc.); or developing emergency response plans that recognize potential physical, communications, and transportation limitations that older people may face in an evacuation. (Melton, 2023.)

III. The 2025 REIR Leaves Out Other New Information on Wildfires in California.

The 2025 REIR also fails to take into account additional new information on increased wildfire risks in California. The 2022 REIR concluded that "[i]mplementation of the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fire." (2022 REIR at 4.18-35.) But the analysis supporting this conclusion is no longer sufficient, as new information indicates heightened risk.

First, new information generally provides that wildfire risks have only grown in recent years. Human-induced climate change has accelerated impacts of extreme weather events, including but not limited to, increases in areas burned in wildfires. (Melton, 2023.) From 2016-2023, wildfires killed more than 200 people in California, burned down more than 50,000 structures, spurred hundreds of thousands to evacuate their homes, and exposed millions to unhealthy levels of smoke and air pollution. (CalFire, 2023.)[1] The majority were ignited by human activity: for example, electrical transmission lines and electrical equipment caused the 2020 Silverado and Zogg Fires, vehicle sparks started the 2020 Apple Fire, pyrotechnics at a gender-reveal celebration started the 2020 El Dorado Fire, and a house fire likely ignited the 2020 Blue Ridge Fire. As a result, placing more homes and people in very high fire-prone areas such as the Project site undoubtedly increases the likelihood of these ignition sources.

Second, new studies emphasize the severity of health risks from wildfire. For example, wildfires place local communities at higher risk of increased occurrences of poor outdoor and indoor air quality from $PM_{2.5}$ from smoke, which can have both acute and long-term health effects that disproportionately affect vulnerable populations, like children, the elderly, those with underlying chronic disease, low-income communities, and communities of color. (Reid-Wainscoat et al., 2024.) In addition, epidemiologists recently found that increased exposure to wildfire smoke may also be linked to higher rates of dementia. (B. Zhang et al., 2023; Z. Zhang et al., 2023.) Researchers further estimate that between 2008 and 2018 California wildfire smoke caused more than 50,000 premature deaths. (Connolly et al., 2024.)

[1] These data are from annual CalFire Incident Reports, available at https://www.fire.ca.gov/incidents.

Third, new information since 2022 sheds light on the costs of wildfires for state and local authorities. Fire suppression costs in areas managed by the California Department of Forestry and Fire (Cal Fire) have skyrocketed from $114 million in the 2000-2001 fiscal year to close to $3 billion for the 2020-2021 and 2021-2022 fiscal years combined. (CalFire, 2022.) During the 2022-2023 fiscal year, CalFire used an estimated $3.3 billion for wildfire protection and suppression. (LAO, 2023.) This does not include the cost of lives lost, property damage, or clean up.

And finally, firefighters have become increasingly strained and over-burdened due to recent extreme weather and fire conditions, which, in combination with poorly planned development, has led to more ignitions and longer fire seasons. Wildland firefighters suffer disproportionately high rates of cancer and other serious diseases, likely due to extreme smoke exposure. (Hwang et al., 2023; Johnson & Lam, 2023.) In addition, the physical and mental fatigue of endlessly fighting fires and experiencing trauma have spurred new reports indicating rising rates of suicide and substance abuse among firefighters. (Cart, 2022.) The revised EIR must assess these impacts and include appropriate mitigation.

IV. The Project Remains Inconsistent with the General Plan.

The Project remains inconsistent with the applicable General Plan policies that guide development on the site. These include, but are not limited to, minimum lot size requirements, including a lake or golf course and a dedicated sports park, and including a Development Agreement. The Project's inclusion of 445 "Active Adult" units does not qualify the Project for the State Density Bonus Law, and, even if it did, the State Density Bonus Law does not require or authorize cities and counties to waive or ignore all applicable general plan policies with which a proposed project is inconsistent. Accordingly, if the City wishes to approve the Project as proposed, it should do so by way of an amendment to the General Plan, and should accordingly put the decision to a vote of the citizens of Santee, as required by Measure M.

V. Conclusion

Thank you for the opportunity to submit comments on the 2025 REIR for Fanita Ranch. We urge the City to prepare a new EIR for the Project that fully complies with CEQA and recirculate the revised EIR. Because significant new information has become available, the City must reevaluate and incorporate this information, as well as new

research and studies on the Project's impacts that have become available in the last few years.

Given the possibility that the Center will be required to pursue legal remedies in order to ensure that the City complies with its legal obligations including those arising under CEQA, we would like to remind the City of its statutory duty to maintain and preserve all documents and communications that may constitute part of the "administrative record" of this proceeding. (§ 21167.6(e); *Golden Door Properties, LLC v. Superior Court* (2020) 53 Cal.App.5th 733, 762.) The administrative record encompasses any and all documents and communications that relate to any and all actions taken by the City with respect to the Project, and includes "pretty much everything that ever came near a proposed [project] or [] the agency's compliance with CEQA . . . ." (*County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.) The administrative record further includes all correspondence, emails, and text messages sent to or received by the City's representatives or employees, that relate to the Project, including any correspondence, emails, and text messages sent between the City's representatives or employees and the Applicant's representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the City (1) suspend all data destruction policies; and (2) preserve all relevant hardware unless an exact replica of each file is made.

Please add the Center to your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the email listed below.

Sincerely,

Meredith Stevenson
Staff Attorney
2100 Franklin Street, Suite 375
Oakland, CA 94612
mstevenson@biologicaldiversity.org

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Comment Letter O6: Preserve Wild Santee, April 10, 2025

O6

From: Save Fanita
To: Sandi Sawa
Cc: Marni Borg
Subject: Re: Fanita Ranch EIR comment upload link
Date: Thursday, April 10, 2025 2:47:16 PM
Attachments: Fanita 2025 2ndRFSEIR PWS v4 04022025 F_cleaned.pdf
ATT00001.txt

Your attachment(s) were cleaned by Check Point Sandblast Threat Extraction.

Click here to restore the original(s) or contact your system administrator.

You may be required to authenticate, in that case follow these instructions:
1. You will be directed to a page where you would be requested to specify your email address.
2. An email with verification code will be sent to you.
3. Copy the code and return to the attachment recovery page.
4. The email with original attachments will be released to your mailbox.

Please exercise discretion when requesting to release suspicious attachments.

Hi Sandi,

Yes, I was able to upload 3 PDFs to the folder.
1: PWS Letter
2: A Binder with Footnotes & References (110 individual PDFs)
3 A18 California-State Climate Summary 2022 that could not be included in the binder due to the PDF setting

I have attached an identical PDF file of PWS Letter without the large exhibit files for your convenience.

I was able to open the documents uploaded without any issue. Please confirm your receipt of the 3 uploads.

And finally, for the record, Preserve Wild Santee has joined / fully supports the letter submitted from the Center for Biological Diversity.

Thank you for your assistance!

Van Collinsworth, Director
Preserve Wild Santee

> On Apr 9, 2025, at 2:16 PM, Sandi Sawa wrote:
>
> Great! Please let me know if you are able to upload to the folder and/or if you have any questions.
>
> Thank you,
> Sandi
>
> Sandi Sawa, MPL, AICP
> Director of Planning and Building/City Planner
> (619) 258-4100 x 167
> ssawa@cityofsanteeca.gov
>
> Please note that I will be out of the office from 4/10-4/20/25.
>
> -----Original Message-----
> From: Save Fanita
> Sent: Wednesday, April 9, 2025 1:52 PM
> To: Sandi Sawa
> Cc: Marni Borg
> Subject: Re: Fanita Ranch EIR comment upload link
>
> I received your message - thank you Sandi Van
>
>> On Apr 9, 2025, at 1:38 PM, Sandi Sawa wrote:
>>

>> Mr. Collinsworth,
>>
>> The email: savefanita@gmail.com has been authorized to upload documents to this one drive folder: https://cityofsanteeca1-my.sharepoint.com/:f:/g/personal/ssawa_cityofsanteeca_gov/EuLeS3QmFaZNiFm393VMpbYBSTAPDKpVtWshfZGed6T1gA?email=savefanita%40gmail.com&e=7mal6A until tomorrow, Thursday, April 10th at 5:00pm. Depending on the size of the document/documents you are uploading, you may still need to compress them.
>>
>> Please confirm receipt of this link and let me know if you have any questions.
>>
>> Sincerely,
>> Sandi
>>
>> Sandi Sawa, MPL, AICP
>> Director of Planning and Building/City Planner
>> (619) 258-4100 x 167
>> ssawa@cityofsanteeca.gov
>>
>> Please note that I will be out of the office from 4/10-4/20/25.
>>
>> -----Original Message-----
>> From: Save Fanita
>> Sent: Tuesday, April 8, 2025 6:54 PM
>> To: Sandi Sawa
>> Subject: Fanita Ranch EIR comment upload link
>>
>> Hello Ms. Sawa,
>>
>> I have a comment letter and exhibits that will likely require direct upload. Please provide me with the upload link for comments.
>>
>> Thank you,
>> Van Collinsworth, Director
>> Preserve Wild Santee
>

PRESERVEWILDSANTEE.ORG

PRESERVE WILD SANTEE

April 2, 2025

Sandi Sawa, AICP, Director of Planning & Building
Santee City Council
By Email: ssawa@cityofsanteeca.gov

RE: Fanita Ranch 2nd Recirculated Sections FREIR (SCH# 200506118) "EIR"

Dear Director Sawa and City Council,

O6-1

PWS urges the City of Santee to reject the latest scheme intended to avoid Santee voters jurisdiction over the project. Approval of the project would clearly violate the will of Santee voters as demonstrated by the establishment of Measure N, The Santee General Plan Protection Initiative, and the prior 2/3 landslide vote of Santee residents against a 3,000-unit development on Fanita Ranch.

Corporate lawyers should not be able to devise schemes to avoid local residents control of land use.

Lawyers working for HomeFed Fanita Rancho LLC (a veil for the New York holding company Jeffries Financial Group that took control of Fanita Ranch in 2012) coordinated with Santee City Attorney's office to devise a scheme intended to circumvent Santee voters. The process devised is anti-democratic, unethical and illegal.

9222 LAKE CANYON ROAD, SANTEE CA SAVEFANITA@GMAIL.COM

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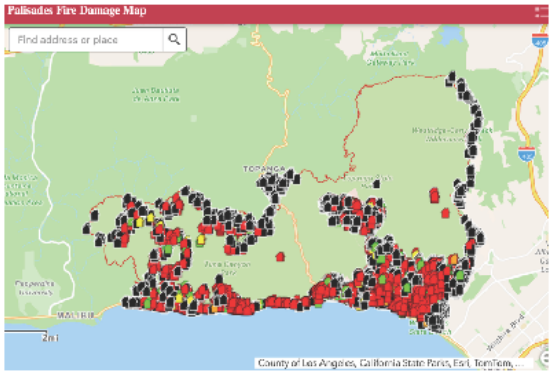
O6-1: The comment provides an introduction to the comment letter and raises voting concerns. Please refer to Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report (EIR) for the Fanita Ranch Project (proposed project). Therefore, no further response is required.

O6-2

Fires of 2025 and other geophysical data since the 2022 project analysis constitute significant new information required to be considered by CEQA



Structure-to-Structure Destruction - Palisades Fire

The second and third most destructive fires in California history occurred in January 2025. The Eaton Fire killed 18, destroyed 9,413 structures and damaged 1,074 other structures.. The Palisades Fire killed 12 and destroyed 6,837 structures and damaged 973 other structures.[1] The destruction occurred despite being relatively "small" in acreage relative to other destructive California fires.

In perspective, the massive total destruction in a single month represents more than triple and more than double the number of structures proposed to be placed in a Very High Fire Hazard Severity Zone on Fanita Ranch. The LA destruction demonstrates under an extreme weather ignition, the entire Fanita Ranch subdivision of 3,000 units could be destroyed in a single night.

[1] CAL FIRE. Top 20 Most Destructive California Wildfires. February 7, 2025. https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/top20_destruction.pdf?rev=9d25d868e50f40aea6083364 2d65b449&hash=1D8AA2515C9CC52EDC5AAEA2358158664

2 of 31

O6-2: In summary, the comment states that recent fires and other geophysical data since the 2022 project analysis constitute significant new information required to be considered by California Environmental Quality Act (CEQA). The comment also compares the proposed project's wildfire risk with recent fires in Los Angeles, Hawai'i, and Colorado. Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk, which addresses these claims.

The comment further states that the Final Revised EIR fails to consider any lower density alternatives for senior housing or provide a meaningful Santee General Plan consistency analysis. Section 4.10, Land Use and Planning, of the Second Recirculated Sections of Final Revised EIR discusses the proposed project's consistencies and inconsistencies with the Santee General Plan Guiding Principles for the project site. The review of local land use plans, including the Santee General Plan, indicated that the proposed project would generally conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant. Moreover, as discussed in Section 4.10 of the Second Recirculated Sections of the Final Revised EIR, the application of waivers through the state Density Bonus Law and the Essential Housing Program eliminates any inconsistency between the proposed project and the Santee

O6-2 cont.

Winds driving the LA fires of 2025 were the most severe Santa Ana wind event in a decade. Considering greater and rising amounts of energy are now trapped inside the earth's atmosphere and there is no escape from the physical law that all energy is conserved, it follows that winds distributing the rising quantity of energy can come with greater velocity and duration. This exposure includes San Diego County and the wind corridor over Fanita Ranch.

The Eaton Fire ignition was reported at 18:18 PST January 7, 2025. Radio traffic and resident accounts indicate that by 18:33, 15 minutes after ignition, flrebrands were setting structures on fire within a one mile distance. A 19:28 radio call reported the Creekside Court community south of New York Drive ablaze, about an hour and 10 minutes after ignition. This area, close to the ignition point, sustained heavy damage from firebrands (burning airborne fuels). A fire with similar circumstances striking Fanita Ranch within15 minutes would make a safe evacuation infeasible and place residents under threat of smoke inhalation and incineration.

In 2023, the Lahaina Fire on Maui burned 2,207 structures and killed 102, making it the deadliest US fire in over a century. Many of the destroyed structures had separations less than 20 feet.[2] The Lahaina destruction was rapid. The first structure ignition reported with 45 minutes of ignition and first death reported with 90 minutes. Reference the Lahaina Fire Incident Analysis Report[3] and Lahaina Fire Comprehensive Timeline Report[4]

The Lahaina wildland fire ignition at 14:55 burned structures within 45 minutes. 911 calls of structure fire are documented at 15:38. The first fatality was reported on Mill Street at 16:24, within 90 minutes of ignition. The fire burned through the urban footprint reaching the waterfront by 16:31 in approximately 96 minutes. The fire perimeter would continue to destructively expand through the night until forward progression was stopped at 05:00, the early morning of August 9, 2023.

[2] IBHS Research. IBHS Early Insights Lahaina Fire 2023. August 2023 Page 5. https://ibhs.org/wp-content/uploads/IBHSEarlyInsights-LahainaFire.pdf

[3] Kerber, Steve. Alkonis, Derek. Lahaina Fire Incident Analysis Report. Fire Safety Research Institute. September 13, 2024. https://d1gi3fvbl0xj2a.cloudfront.net/2024-09/FSRI_Lahaina_Report__Redactions_09102024.pdf

[4] Kerber, Steve. Alkonis, Derek. Lahaina Fire Incident Analysis Report. Fire Safety Research Institute. April 17, 2024. https://d1gi3fvbl0xj2a.cloudfront.net/2024-04/FSRI_Lahaina_Fire-Comprehensive_Timeline_Report_04_17_2024_Redacted_Final_0.pdf

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General Plan Guiding Principles referenced above. No further response is required.

Finally, the comment states that the 2020 traffic studies for the proposed project are outdated. Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

O6-2 cont.

The Lahaina Fire timeline demonstrates there are catastrophic scenarios capable of impacting Fanita Ranch proposed residents well before project inhabitants could be evacuated.

The most destructive fire in Colorado history ignited at 11:05 on December 30, 2021. The Marshall Fire destroyed 1,121 structures, killed 2 residents in different locations, killed "more than 1,000 pets"and burned 6,080 acres. Property damage was tagged at $2 billion.[5] The extensive animal deaths were attributed to the large number or residents at work at the time of ignition or away for the holidays. The extensive pet deaths leaves a heavy emotional burden for residents.[6] Two years later, about half of the victims were still waiting for building permits.

The first evacuation orders were issued "immediately." "The fire was moving faster than some evacuation orders could be developed and launched." The Marshall Fire "began consuming structures almost immediately."[7] Fire crews were able to attack a structure fire at 11:15 about ten minutes from ignition.

In contrast to Fanita Ranch project area, the Marshall Fire evacuation zones have a substantially more robust circulation system consisting of a major freeway and many major roads to facilitate evacuation.

Notably, both fatalities were over age 55. Robert Sharpe, age 69, perished in his home apparently trying retrieve personal mementos for evacuation. Nadine Turnbull, age 91, died when she returned home attempting to rescue her dogs.[8]

As applicable to Fanita Ranch, the Marshall Fire demonstrates the vulnerability of elderly people and large numbers of pets despite and because of a time of fire ignition when large numbers of residents are away from home (11:05 a.m. on a weekday of a holiday week).

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[5] Andersson, Kelly. Colorado's 2021 Marshall Fire Investigation Concluded. Wildfire Today. June 8, 2023. https://wildfiretoday.com/tag/marshall-fire/

[6] Irvine, L., & Andre, C. (2022). Tracking the Effects of the Marshall Fire on Pets and People (Natural Hazards Center Quick Response Research Report Series, Report 347). Natural Hazards Center, University of Colorado Boulder. https://hazards.colorado.edu/quick-response-report/tracking-the-effects-of-the-marshall-fire-on-pets-and-people

[7] Marshall Fire After-Action Report (AAR) December 30, 2022. Page 4. p 8. https://www.superiorcolorado.gov/files/assets/town/v/1/disaster-preparedness-amp-recovery/documents/marshall-fire-operational-after-action-report.pdf

[8] Krause, Rachel. 2 years after the Marshall Fire: Some families rebuild, others stuck in limbo. 9News, December 30,2023. https://www.9news.com/article/news/local/wildfire/marshall-fire/two-years-after-marshall-fire-families-rebuild/73-4e6eb4ca-20b2-4ddb-b730-bde1e2daa702

O6-2 cont.

Destroyed homes by the Marshall Fire had inadequate separation of just 10-20 feet. In contrast, homes that survived had greater separation.[9] Marshall Fire, destroyed home spacing confirms the vulnerability of Senior Units proposed for Fanita Ranch with close proximity/inadequate separation. Greater structure separation can reduce radiant heat levels toxic to both residents and firefighters.

The density of the homes relative to each other in the urban/suburban developments transitioned wildland fires into deadly urban conflagrations of downwind cluster burned homes. The fuel for fire spread on the urban footprint were homes in close proximity to each other, which were vulnerable to direct flame impingement, radiant heat and their conversion into airborne firebrands. Structures that ignite have a high probability of complete destruction and spread to adjacent structures by direct flames, radiant heat and embers creating a domino impact.

There are significant differences in the fuel loads and topography of Fanita Ranch relative to the landscapes of the Lahaina Fire and Marshall Fire. The Lahaina and Marshall landscapes had much lighter grassland fuels on flat and mild topography. Fanita Ranch has much heavier fuel loads of coastal sage and chaparral on steep slopes in excess of 20%. Fanita Ranch heavier fuel loads and topography represent much higher relative hazard factors.

The significant new reality of the massive number of structure-to-structure ignitions requires a reduction in unit density for the proposed Fanita Ranch project. If homes are to be located within the highest designation fire hazard severity zone, a minimum property line set back of twenty-five feet, and preferably 30 feet, should be established to reduce the risk of structure-to-structure ignitions. This would create a range from 50-60 feet of total distance between structures, which removes each structure from an adjacent structure's Home Ignition Zone.

Implementation of a 25-30 feet set back requirement would be more consistent with Essential Element/GP3 minimum lot size requirements within the historical and updated Land Use Elements of the Santee General Plan. The lower density lot size requirement has been consistent since its adoption by the Santee City Council in 1996. All

[9] Gabbert, Bill. Photos show devastation after the 6,000-acre Marshall Fire in Colorado. Wildfire Today, January 1, 2022. https://wildfiretoday.com/2022/01/01/photos-show-devastation-after-the-6000-acre-marshall-fire-in-colorado/

O6-2 cont.

developer attempts to amend the General Plan's lot size requirement have been appropriately defeated by voters and the courts.

Given significant evacuation delays for senior housing and the higher chance of shelter-in-place orders, it's crucial to minimize the risk of structure-to-structure cluster burn fires with potential deadly consequences. Establishing minimum property line set backs of 25-30 feet is a feasible mitigation measure.

The EIR fails to consider any lower density alternatives for Senior Housing or provide a meaningful General Plan consistency analysis.

Fire size/acreage continues to explode

Eighteen of California's largest fires have occurred after the 2003 Cedar Fire in San Diego County established a record for the largest fire at 273,246 acres - a record soon broken repeatedly. Massive fires exceeding 100,000 acres are often called megafires. The 429,603 acre Park Fire of 2024 burned in Northern California destroyed 729 structures. The 429,603 acre Park Fire is now the 4th largest California fire on record.[10]

As weather grows more extreme, we should expect the trend of larger and more destructive fires to continue, placing Fanita Ranch and similar topography at increasing risk. The frequency of destructive megafires is significant new information which requires consideration.

2023 was the hottest year on record, until 2024 set a significant new record.

Every year of this decade has broken any other heat record set in prior decades, confirming the need to plan for accelerating higher temperatures with more extreme weather impacts.[11] The EIR fails to analyze, disclose and mitigate for the significant adverse impacts of accelerating global temperature increase.

Consistent with rising extreme weather risk, since 2022, property insurance rates and cancellations are significantly rising, locally, in

[10] CAL FIRE.. Top 20 Largest California Wildfires. October 10, 2024. https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/top-20-largest-ca-wildfires.pdf?rev=097f901c128347149e2614f2fca4f546&hash=27DDE83DFEF9A69E67C73765892A2B75

[11] Mooney, Attracta. Tauschinski, Jane. Bernard, Steven. World breaches 1.5C global warming target for first time in 2024 - Data for warmest year sparks fears climate change is accelerating faster than expected. Financial Times. January 9, 2025. https://www.ft.com/content/fa914266-71bf-4317-9fdc-44b55acb52f6?utm_source=chatgpt.com.

O6-2 cont.

California and nationwide.[12] In 2022, All State, Farmers and State Farm, among others, stopped issuing property insurance in California.[13] Since the proposed development falls entirely within the most severe fire hazard designation, (VHFHSZ), insurance policies from major insurers for the proposed development cannot be obtained. Rates for fire coverage of last resort by the California "Fair Plan", if it becomes available, are so high as to assure that no new unit on Fanita Ranch (Senior or otherwise) can be considered as "Affordable Housing."

Neither has the EIR analyzed how rising wildfire risk will increase flood risk on and adjacent to the sites steep topography. Flood insurance is likely to be increasingly needed and yet unobtainable. Fire impacts are predicted to increase the pace of flood risks beyond wildfire risks.[14]

During construction phases of the project, how would wildfire or flood losses impact the ability to rebuild, and simultaneously build out the project with newly insured project dwellings?

Who is responsible for the damage and cleanup of toxic material left after a wildfire on Fanita Ranch, regardless of if it comes during the construction phase or after resident sales? Will a bond be required to pay for catastrophic damages as mitigation for the significant hazard?

Note, by year end 2023, only 500 of the 18,804 structures destroyed in the 2018 Camp Fire[15] had been rebuilt. About 97% of the structures lost had not been rebuilt 5 years later.[16]

Repeating temperature records, a failing insurance system and the inability to rebuild after destruction is all significant new information required to be considered, which the EIR fails to do.

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[12] Mills, Evan. Roth Jr, Richard J. Lecomte, Eugene. Availability and Affordability of Insurance Under Climate Change A Growing Challenge for the U.S. Ceres. December 2005. https://www.researchgate.net/publication/255664655_Availability_and_Affordability_of_Insurance_Under_Climate_Change_A_Growing_Challenge_for_the_US

[13] Guevara, Elizabeth. Insurers Flee California in Recent Years. Investopedia, March 04, 2025. https://www.investopedia.com/insurers-flee-california-in-recent-years-experts-say-their-return-depends-on-homeowners-wildfires-8778666?utm_source=chatgpt.com

[14] Guevara, Elizabeth. Flood Risk May Surpass Wildfire Risk in California By 2025 Adding To Home Insurance Costs. Investopedia. February 24, 2025. https://www.investopedia.com/flood-risk-may-surpass-wildfire-risk-in-california-by-2025-adding-to-home-insurance-costs-11683443

[15] CAL FIRE. Top 20 Deadliest California Wildfires. February 7, 2025. https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/top20_destruction.pdf?rev=8d25d868e50f40aea60833642d65b449&hash=1DBAA251C9CC52EDC5AAEA2358158664

[16] Muir-Wood, Robert. Five years on since California Camp fire: The fate of Paradise. Moodys. November 08, 2023. https://www.moodys.com/web/en/us/insights/insurance/five-years-on-since-californias-camp-fire-the-fate-of-paradise.html

Fire seasons are longer and fires are harder to extinguish

"***…when I look back over my career, I cannot deny that fire season is now longer. I cannot deny that fires are harder to extinguish***."[17] LA County Fire Chief Anthony C. Marrone

Chief Marrone's remarks square with my own experience. The first wildland fire I fought with structure loss was in 1981. Despite the fire being wind driven, our ground forces were able to stop the forward progress of the 1981 Swall Fire in Inyo County, saving the community, with few homes lost. While one US Forest Service fire engine was fire damaged, there were no fatalities. In contrast, the 2015 Round Fire burning in the same area consumed 7,000 acres and 40 homes.

O6-2 cont.

The largest fire I fought was the 133,000-acre Wheeler Fire burning near Ojai in 1985. The fire was active from July 1 - 15. Initially, our crew worked 24-hour shifts in WUI neighborhoods extinguishing embers on and around homes. On later shifts we built line by executing backfiring operations. I personally used a drip torch coordinating with a helitorch above. Ojai was saved, but 26 homes were lost.

In contrast, the 2017 Thomas Fire burned the Wheeler Fire footprint and expanded to set a record for size at 281,893 acres (an acreage record broken 8 times in California since then). The fire destroyed 1,060 structures and took 2 lives, significantly greater loss than for the Wheeler Fire my crew fought in 1985.[18]

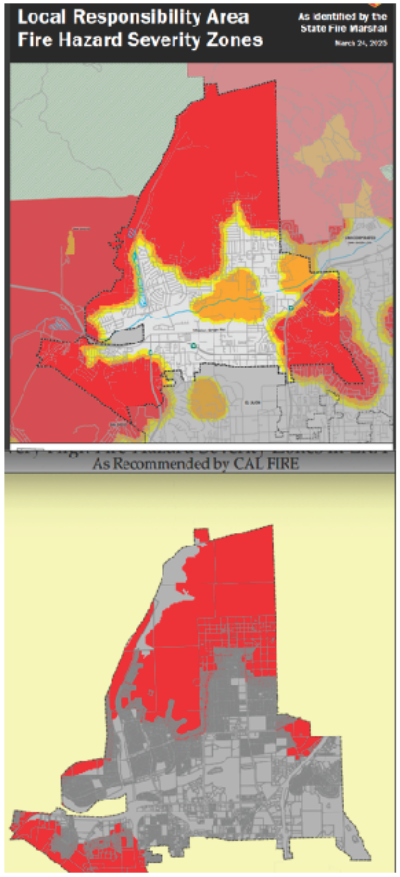
The fires discussed above are personal examples of landscapes where wildfire has grown more extreme over my lifetime despite technological advances in suppression tactics with greater resource availability. Fire intensity has increased substantially in the past 25 years and I expect the trend to continue. This reality has severe implications for people living on or placed on high fire hazard topography, which is a reason why I have spent the last 9 years working in a Fire Prevention Unit where I performed more than 18,500 documented fire inspections and thousands more with analog records no longer available.. Most of these inspections were done in the Cedar and Witch Creek fire corridors.

[17] The Real Story of the LA Fires. PBS Terra. March 19, 2025.

[18] Ojai Valley News. How the Thomas Fire compares to the 1985 Wheeler Fire. December 7, 2017.. https://www.ojaivalleynews.com/archives/how-the-thomas-fire-compares-to-the-1985-wheeler-fire/article_6a766145-6cc8-5e59-9d07-0d7a56770b3e.html

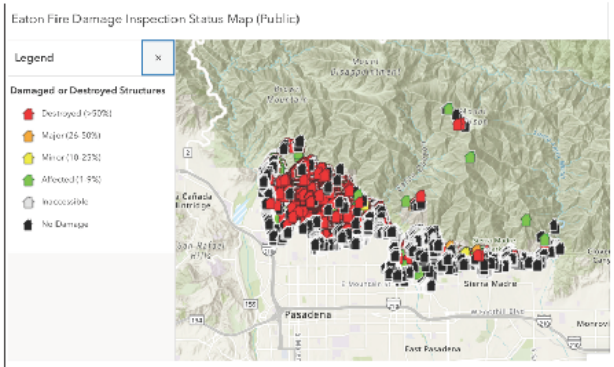
O6-2
cont.

CAL FIRE Released a significant revision to the Very High Fire Hazard Severity Zone Map for the City of Santee, including significant revisions on Fanita Ranch



2025 & 2009 Hazard Map Comparison

O6-2 cont.



Eaton Fire destroyed 7,800 structures outside the VHFHSZ

CAL FIRE's June 11, 2009, Very High Fire Hazard Severity Zone Map[19] was updated March 24, 2025.[20] The most severe hazard zone designations have expanded on Fanita Ranch and other areas of Santee consistent with more extreme weather patterns. Recent climate data from 2003-2018 was utilized for updated maps. The "hazard" level assessments represent the physical conditions expected over a 30-50 year period without risk reduction and the severity or intensity of fire potential in the zone combined with the probability of ignition. This is significant new information the EIR must consider.

The physical hazards on the entire Fanita Ranch have "the highest likelihood of wildfire occurrence and severe fire behavior" as acknowledged by Santee Fire Chief Justin Matsushita, in Agenda Item# 10. In addition, the 2025 Map adds Moderate and High level Hazard Zones off-site adjacent to the project and elsewhere in Santee which has implications for evacuations during major incidents. Performance standards for evacuation (absent from the EIR) should be established.

[19] CAL FIRE. Very High Fire Hazard Severity Zone in LRA As Recommended By CAL FIRE. June 11, 2009. https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map/upload-4/santee.pdf

[20] CAL FIRE. Very High Fire Hazard Severity Zone in LRA As Recommended By CAL FIRE. March, 24, 2025. https://calfire.app.box.com/s/wahuw9ny7cgn89xpch7092ur90r1pwvj/file/1810966895160

Since the map update is significant and legally required, City Staff is seeking Santee City Council direction at a meeting scheduled April 9, 2025, Item #10 (attached). The results of further analysis, public comment and ordinance adoption (with potential expansion of the hazard zones) should be incorporated into the environmental analysis for the Fanita Ranch project. Out of the 9,413 structures destroyed, Staff notes, "7,800 structures burned in the Eaton fire in Altadena were not in any FHSZ." This demonstrates the power of a structure-to-structure fire to burn far into lower and low risk hazard zones once the initial closely spaced structures are transformed into fuel.

Prior to 2009, Santee urban development was largely consolidated in areas of the river valley without fire hazard zone designation. Higher risk hillside development has expanded significantly since 2009 including significant expansion of the wildland-urban-interface (WUI), which adds to risk generated by rising global temperatures.

O6-2 cont.

The 2009 Very High Fire Hazard Zone designation did not designate Sycamore Canyon Creek and some flat terrain on the northwest portion of Fanita Ranch as a Very High Fire Hazard Severity Zone (VHFHSZ). The riparian areas adjacent to the westernmost portions of development were designated "Non-VHFHSZ." The 2025 revision now designates all of Fanita Ranch, including the northwestern riparian area as VHFHSZ. The revision now includes all proposed residential development and other infrastructure entirely within the VHFHSZ. Significantly, any development area that was being considered for a Temporary Refuge Area (TRA) or Safety Zone is now clearly within the most severe hazard zone. All escape routes are within the most severe hazard zone. Any structure considered for shelter-in-place lies within the most severe fire hazard zone. Will performance standards for evacuation be established?

Prior to 2009, there was not any recognized connection of severe fire hazard designated zones of Fanita Ranch to lands off-site to the east or southeast. The 2025 revision now designates more areas of the city as VHFHSZ and connects them using High and Moderate hazard designations. All of Rattlesnake Mountain on the southeast portion of the city is now recognized VHFHSZ and is connected to Fanita Ranch with high hazard zone designation. The Santee Town Center and eastern portions of the San Diego River corridor are now designated High Fire Hazard Severity Zone.

VHFHSZ designations also expanded to residential areas in the west and southwest portions of the city. In total, the most severe designation increased from 46% of the city to 58% of the city (4,907 acres to 6,170 acres of the 10,560 acres in Santee).

How many of Santee's residential and commercial units are now located in a VHFHSZ and what is the numeric difference in units from the 2009 Map? How has the traffic flow changed since the project traffic studies were released circa 2020? How many residential units have been added to the city since 2020? The traffic data is outdated. CEQA requires accurate data for the project revision analysis and disclosures. Recent data should be used to project meaningful evacuation estimates with performance standards aligned with worst case scenario weather and ignition points.

O6-2 cont.

The substantial increase in hazard designations demonstrates the risk of Santa Ana wind driven firestorms threatening Santee's residential and commercial areas has grown. The elevated wildfire hazard raises the probability for impractical mass evacuation orders to be issued that would rely upon Santee's already congested streets.

Seniors are the wealthiest class of Americans. Jeffries Financial Group should not be able to use affordable housing provisions for further enrichment.

Designation of 445 units as "Senior Housing" reserves housing for the wealthiest subset of the population, contradicting the letter and spirit of affordable housing / "Density Bonus" provisions of state law.

O6-3

Since the financial crash of 2008, there has been a massive transfer of wealth from young to old, which has created a permanent renter class nationwide. Consequently, older investors, corporate hedge funds and other financial holding companies continue to increase their vast holdings of vacant second homes, short-term rental vacation homes and other rentals. Americans 55+ have increased their share of housing wealth to 71%. That represents a 17% shift in housing wealth since 1989 to the advantage of individuals age 55+.[21]

[21] Wiltermuth, Joy. This Age Group Owns 79% of Stocks and Equity Funds. Marketwatch. November 20,2024. https://www.marketwatch.com/story/this-age-group-owns-79-of-stocks-and-equity-funds-why-thats-good-for-bonds-ece0f436?utm_source=chatgpt.com

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O6-3: The comment states that designation of 445 units as "Senior Housing" contradicts the "Density Bonus" provisions of state law.

As discussed in the Second Recirculated Sections of the Final Revised EIR, in accordance with California Government Code, Section 65915(b)(1)(C), (e)(1), (f)(3)(A), (p)(1), and California Civil Code, Section 51.3(b)(1), (4), with the inclusion of 445 age-restricted senior units (55 years of age or older) within the Active Adult community, the entire proposed project is entitled to density bonus, waiver, and reduced parking benefits under the Density Bonus Law. The proposed project's 445 senior units far surpass the 35 needed to qualify for mandatory Density Bonus Law benefits, including waivers of development standards in accordance with California Government Code, Section 65915(b)(1)(C), (e)(1).

The comment also states that there is no project description for the senior housing use. The Active Adult land use designation was described in the Final Revised EIR and has not changed. It would apply to approximately 31 acres within Fanita Commons and would allow development of approximately 445 residential units. It would establish areas for age-restricted residential uses in a variety of building types, with densities ranging from 5 to 25 residential units per acre and a maximum building height of 55 feet. The Active Adult land use designation would occur in the

Other data demonstrates the "real homeownership gap between today's young adults and those of 20 years ago is more than three times higher."[22]

Would 556 units of Fanita development be restricted to lower income households as defined in Section 50079.5 of Health and Safety Code and as required to meet the specifications in California Civil Code Section 51.3.5? No evidence has been presented to assure "The development is affordable to lower income households as defined in Section 50079.5 of Health and Safety Code." California Civil Code Section 51.3.5.

O6-3 cont.

Fanita Ranch does not qualify as a Senior Community because it would not meet the 80% age 55+ occupied threshold. Nor is there evidence the development would have age specific policies required by The Housing for Older Persons Act of 1995 (HOPA).

Where are the governing documents for this supposed Senior Housing? Fanita Ranch is not zoned as Senior Housing. At minimum, governing documents are required; California Civil Code Section 51.1.1 (4).

Would the Senior development include a "shared housing building development and a residential care facility for the elderly as defined in Section 1569.2 of the Health and Safety Code?"

No evidence has been presented that 445 Units actually meet the legal terms for a Senior Housing designation. Where is the project description for this proposal?

Senior Housing Designation is a significant impact to public safety

The 445 unit Senior Housing Designation is an undisclosed significant adverse impact to public safety.

O6-4

Fanita Ranch diverse topography is designated "Very High Fire Hazard Severity Zone" (VHFHSZ) by CAL FIRE. The Hazard Severity Zone Map for Santee was updated March 24, 2025 and now includes the entire site, including the riparian areas. The designation is based upon factors like dense vegetation, rugged terrain, and a history of wildfires. Historical data underscores this danger: the area has experienced 65

[22] Goodman, Laurie. Choi, Jung Hyun. Zhu, Jun. The Real Homeownership Gap between Today's Young Adults and Past Generations is Much Larger than You Think. Urban Institute April17, 2023. https://www.urban.org/urban-wire/real-homeownership-gap-between-todays-young-adults-and-past-generations-much-larger-you

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northwestern portion of Fanita Commons, near the Village Center, Farm, and Community Park.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

O6-4: This comment states that the Final Revised EIR does not adequately analyze the risks of placing senior citizens in a Very High Fire Hazard Severity Zone. Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk.

O6-4 cont.

fires in the last century, including the 2003 Cedar Fire, which burned 95% of the site.

Seniors have declining agility, declining hearing and vision and are more likely to be suffering from chronic health issues or disabilities at higher rates than an under age 55 population. Power disruption alone can be life threatening for those dependent upon medical devices.[23]

"Older adults are more likely than others in a community to be socially isolated and have multiple chronic conditions, limitations in daily activities, declining vision and hearing, and physical and cognitive disabilities that hamper their ability to communicate about, prepare for, and respond to a natural disaster (Levac, Toal-Sullivan, and O'Sullivan, 2012; Aldrich and Benson, 2008)."

FEMA notes: "The senior population is among the most vulnerable, especially for those who live alone."[24] [25] [26] [27]

The 2025 LA fires provide further confirmation of seniors' vulnerability: "…most of the 25 residents who were confirmed to have died during the fire were either aged 65 years or older or had a physical disability that made evacuation near impossible. There were 2 victims of the fires who were diagnosed with cerebral palsy and 1 with a leg amputation that were not able to evacuate without emergency assistance."[28]

During firestorm events, road closures and other factors have created Inability for caregivers to reach evacuation order zones to rescue impaired seniors.

[23] Daniels, Sarah. Bailey, Birdie. Wainright, Rosie. Daniels, Gary. Physiological and behavioural factors that influence evacuation times of elderly people: a systematic literature review. July 15, 2024. https://d197for5662m48.cloudfront.net/documents/publicationstatus/213215/preprint_pdf/ef5c8db07698bb29203eb80b69be5351.pdf

[24] FEMA. Seniors - Prepare Now for an Emergency. April 9, 2021. https://www.fema.gov/fact-sheet/seniors-prepare-now-emergency

[25] Sernberg, Erik. Perspectives on egressibility of older people with functional limitations. Fire Safety Journal 127, 2022. https://www.sciencedirect.com/science/article/pii/S0379711221002514?via=ihub

[26] NIH. Disaster Preparedness and Recovery for Older Adults. https://www.nia.nih.gov/health/safety/disaster-preparedness-and-recovery-older-adults

[27] HHS & NIH. Protecting older adults from the effects of natural disasters and extreme weather | National Institute on Aging. October 18, 2022. https://www.nia.nih.gov/news/protecting-older-adults-effects-natural-disasters-and-extreme-weather

[28] Bonavitacola, Julia. Wildfire Evacuations Spell Difficulties for Disabled, Elderly Residents. AJMC. January 17, 2025. https://www.ajmc.com/view/wildfire-evacuations-spell-difficulties-for-disabled-elderly-residents

O6-4 cont.

Placement of a senior population within a State designated "Very High Fire Hazard Severity Zone" adds layers of complexity to the execution of any evacuation orders issued. The significant adverse impact to public safety of introducing these complexities can be avoided by eliminating the "Senior Units" from the project.

The EIR does not adequately analyze the risks of placing a 445 Unit Senior Community into a scientifically determined Very High Fire Hazard Severity Zone. The EIR fails to consider alternative locations for a Senior Community on or off-site. Introduction of 445 Senior Units (about 15% of total units) is a significant change to the project, yet the EIR fails to provide even a basic map of the major project change.

The failure to provide a detailed project description and basic map of the Senior Housing proposal is a failure to proceed in a manner required by law. Impact analysis and mitigation measures require this foundational information.

The EIR fails to consider the cumulative impacts of multiple Senior Community developments in Very High Fire Hazard Severity Zones on opposite sides of the City. Senior developments significantly increase traffic flow to senior homes during evacuation warnings/orders to rescue or facilitate mobile or less mobile individuals.

How many Senior Units have been built in Santee since release of the 2020 Fanita Ranch EIR and where in the city are the units located? How many Senior Units total are in a VHFHSZ? Please fully disclose the impacts to public safety of building another Senior Housing Community in a VHFHSZ.

The EIR fails to provide adequate detailed fire modeling under various conditions and consider the implications for evacuation of Senior Housing and existing development now in designated High and Very High Hazard Severity Zones. For example, the entire Weston development is reliant upon Mast Blvd as its only evacuation route, and is now designated VHFHSZ.

O6-4 cont.

Research has established individuals over age 55 take significantly longer time to evacuate.[29]

Individuals over age 55 often take significantly longer to evacuate during wildfires and other natural disasters. This conclusion is supported by a combination of empirical observations, case studies, and theoretical models that highlight the unique challenges faced by older adults in evacuation scenarios.

Key delay factors extending evacuation time include the following:

Physical Limitations: Aging often brings reduced mobility, slower walking speeds, or chronic health conditions that require medical equipment (e.g., oxygen tanks or wheelchairs). These physical constraints can slow both the preparation process and the physical act of leaving a home or reaching a safe location.[30]

Preparation Time: Older adults regularly need more time to gather essential items, such as medications, important documents, or supplies for dependents or pets. This additional preparation can extend the time between receiving an evacuation warning and actually departing.

Decision-Making Delays: Psychological factors, such as reluctance to leave a home due to emotional attachment or difficulty processing urgent information (especially in cases of cognitive decline), can delay the decision to evacuate. While some older adults may act promptly due to risk aversion or past experience, others may hesitate, increasing their overall evacuation time.

Transportation Challenges: Many wildfire evacuations rely on vehicles, but older adults may face issues like limited access to transportation, slower reaction times while driving in chaotic conditions, or the need to wait for assistance from others. In cases where evacuation must occur on foot—due to traffic congestion or blocked roads—physical limitations become even more significant.

Evidence strongly suggest that older adults take longer to evacuate:

[29] Gyu-Yeob Jeon. Study on the relation between age and evacuation… Contemporary Engineering Sciences." January 2014. https://www.m-hikari.com/ces/ces2014/ces21-24-2014/49131.html

[30] Stein, Dr. Michael Ashley. How Natural Disasters Can Affect Disabled Individuals. AJMC. January 28, 2025. https://www.ajmc.com/view/q-a-dr-michael-ashley-stein-speaks-on-how-natural-disasters-can-affect-disabled-individuals

O6-4 cont.

Fatality Data: Studies of specific wildfires reveal that older adults are disproportionately represented among victims, implying difficulties in evacuating in time.

For example: In the 2018 Camp Fire in Paradise, California, the majority of the 85 fatalities were individuals over 60, with reports indicating that some couldn't evacuate quickly enough due to mobility issues or traffic congestion.

The 2009 Black Saturday bushfires in Australia showed a similar pattern. The Royal Commission found 76 of the 173 fatalities were elderly or otherwise vulnerable, suggesting that age-related factors prevented timely evacuation.

Qualitative Accounts: Post-disaster surveys and survivor interviews often highlight challenges faced by older adults. For instance, in the Paradise fire, anecdotal evidence describes elderly individuals who needed assistance to leave or who spent extra time gathering belongings, delaying their departure.

Evacuation Modeling: Research in disaster management uses agent-based models to simulate evacuation behaviors. These models frequently assign slower movement speeds and longer decision-making times to older individuals, reflecting assumptions grounded in general studies of walking speeds and human behavior during emergencies. Although these simulations rely on theoretical parameters, they align with observed vulnerabilities in real events.

Broader Disaster Contexts: Studies of other natural disasters, such as hurricanes and tsunamis, reinforce these findings. For example, research following the 2011 Japan tsunami found that older adults were less likely to evacuate immediately and more likely to be caught, partly due to slower response times or physical limitations. While not specific to wildfires, these insights highlight age as a consistent factor in evacuation dynamics.

Beyond direct time measurements, the heightened vulnerability of older adults during wildfires indirectly supports the conclusion they take longer to evacuate:

Higher Mortality Rates: The overrepresentation of older adults among disaster fatalities suggests that they either start evacuating later or move more slowly, reducing their chances of reaching safety in time.

O6-4 cont.

Special Assistance Programs: Emergency planning often includes specific provisions for older adults, such as evacuation registries or prioritized support, recognizing that they may need more time or help to evacuate effectively.

Cumulative evidence—spanning mortality statistics, survivor accounts, and simulation models—consistently points to significant delays for individuals over 55. Research on wildfires and other natural disasters indicates that individuals over age 55 often take significantly longer to evacuate. This is driven by physical, logistical, and psychological factors, as evidenced by higher fatality rates in events like the Camp Fire and Black Saturday bushfires, qualitative reports of evacuation challenges, and theoretical models accounting for age-related vulnerabilities. While direct time measurements are limited, the broader body of disaster research strongly supports the conclusion of significant delays for seniors, making it a well-recognized concern in emergency planning and response.

Fanita Ranch fails to provide adequate disaster resilience measures.

Research concludes: "The increasing frequency and intensity of weather-related and other disaster events combined with the growing proportions of older adults present a new environment in which public health programs and policies must actively promote the resilience of older adults."[31]

What resilience measures will the project incorporate to mitigate the increasing frequency of extreme wildfire, the additional assistance needs of elders and the markedly slower evacuation times of the Senior Housing Designation?

How many of the 445 Senior reserved units will be single level? Multi-level units are not appropriate housing for many seniors. Multi-level units are a significant safety risk for the elderly under normal conditions. The risk rises significantly when exacerbated by the stress of evacuation warnings and evacuation orders.

If the units are multistory, will elevators be installed? If so, how will the elevators operate under power disruption?

[31] Shih RA, Acosta JD, Chen EK, Carbone EG, Xenakis L, Adamson DM, Chandra A. Improving Disaster Resilience Among Older Adults: Insights from Public Health Departments and Aging-in-Place Efforts. Rand Health Q. 2018 Aug 2;8(1):3. PMID: 30083424; PMCID: PMC6075802. https://pmc.ncbi.nlm.nih.gov/articles/PMC6075802/

O6-4 cont.

How much time will it take to evacuate SDC-1539 and SDC-1593 under a wind driven fire requiring evacuation orders to be issued? How much additional time will it take to evacuate Zone SDC-1539 and SDC-1593 by restricting residential occupation of 445 units to age 55+?

Since it is undisputed that a wildfire can impact the proposed project area before evacuation orders can be implemented, what services, if any, will be established to mobilize seniors? What services will be established to advise or guide seniors when evacuation is too late?

What services, if any, will be established to guide seniors from one Temporary Refuge Area (TRA) to another during the approach of a rapid velocity fire front? Will there be greater reliance upon "shelter-in-place" for the 445 Senior Housing designated units? How many of the Senior Units (and the project as a whole) have another residential unit within its 30 foot Home Ignition Zone (HIZ)?

Ignition failure of a single unit which encroaches upon another unit's HIZ, is likely to create a domino of urban conflagration (cluster burns) impacting all down-wind Senior Units with 30 foot HIZ encroachments. Reliance upon shelter-in-place combined with encroached Home Ignition Zones has a potential for catastrophic loss of life. The Palisades and Eaton fires of 2025 in Los Angeles demonstrate the power of urban cluster burns in this new extreme weather era. The "EIR" contains no analysis for the significant adverse impact of narrowly spaced homes which are not fire proof.

This significant impact of fine particulate matter exposure must be disclosed and mitigated.

The increasing frequency of wildfires places proposed Fanita Ranch residents at increased exposure to fine particulate matter breathed in smoke. Increased PM2.5 exposure significantly increases health risk to an already vulnerable population.[32] [33]

[32] Readfearn, Graham. Smoke pollution from Wildfires may be killing an extra 12,000 people a year, new research suggests. The Guardian October 21, 2024. https://www.theguardian.com/environment/2024/oct/22/smoke-pollution-from-wildfires-may-be-killing-an-extra-12000-people-a-year-new-research-suggests?utm_source=chatgpt.com

[33] Park, Chae Yeon. et al. Attributing human mortality from fire PM2.5 to climate change. Nature Climate Change, Volume 14 November 2024. P. 1193-1200. https://www.nature.com/articles/s41558-024-02149-1.epdf?

O6-4 cont.

Would Senior units have battery storage or other power back up systems? If not, will battery storage products be prohibited from internal or external installations?

How must firefighters modify their fire suppression tactics to account for highly flammable internal or external battery storage products and electric vehicles? What are the additional risks under a cluster burn, structure-to-structure, ignition scenario?

How many total project units will have or be allowed Lithium Ion battery storage installations? Would battery storage units be prohibited in all project units due to the vulnerability of the project to wildfire? Who is responsible for a toxic clean-up if structures are destroyed? Will a disaster recovery fee be built into the HOA? Has the project considered placement of grid-scale energy storage at the Sycamore Landfill as an alternative that would avoid the risk of battery ignitions on Fanita Ranch?

Seniors have less physical capacity and often less financial capacity to maintain defensible space over time

Residents cannot rely upon defensible space regulations to be effective, or for Home Owners Associations (HOAs) to enforce or maintain standards over time. Landscaping matures. People accumulate hazardous materials on their property. Seniors' physical abilities decline. Residents often grow complacent over time. As Seniors' retirement savings or income declines, maintenance can become unaffordable or a lower priority.

The San Diego Country Estates in Ramona is governed by an HOA. It is an example of a new development's evolution over time, as described in the preceding paragraph. Due to the heightened fire risk of this subdivision, I've conducted defensible space inspections there every year since 2019, even though it is governed by HOAs.

Despite the fire prevention and HOA maintenance activity, there are substantial numbers of non-compliant inspection notices issued every year. Some of these homes do not become compliant, increasing risk for the neighborhood and subdivision as a whole. Many homeowners request extensions while they describe medical conditions and/or financial constraints as reasons for their violations. Extensions are granted when I believe they are likely to inspire some level of risk reduction.

O6-4 cont.

The process of entropy and percentage of non-compliant properties on Fanita Ranch is likely accelerated and magnified if a decision is made to include "affordable" or "moderate income" households. When fixed or lower income level households are squeezed economically, rates of compliance decline. The inclusion of moderate to lower income households in the project is a significant adverse impact to public safety because the density of the project facilitates structure-to-structure conflagration. A single non-complaint structure could place an entire neighborhood or the entire subdivision at risk of ignition.

Throughout, State Responsibility Areas, enforcement relies almost exclusively upon effective public relations skills. Citations and forced abatements are extremely rare. Thus, noncompliance with PRC 4291, which increases community risk, is still relatively common.

We should expect a similar heightening risk evolution for a Fanita Ranch development, but with risk significantly increased due to the limitations of a senior population. The evolution to higher risk is likely to be further accelerated because the City of Santee does not conduct individual property inspections to insure compliance with PRC 42921 until there is a real estate transaction inspection request.[34] The lack of an individual property inspection compliance program is a significant adverse impact to public safety with a Senior Housing development.

Will the City of Santee establish an individual property defensible space inspection program for homes within the designated Very High Fire Hazard Severity Zone which documents annual compliance with PRSC 4291?

Note, the CAL FIRE updated Fire Hazard Severity Zone Map now identifies Rattlesnake Mountain as "Very High" hazard. The Lantern Crest Senior Housing development at the base of Rattlesnake Mountain now falls within the "Very High" hazard classification. Building another Senior Housing development within the most severe hazard designation would be a known significant adverse impact, by volume and space, upon any assistance resources.

Thirteen of 14 identified Eaton Fire fatalities are known to be over age 55. Eight of nine identified Palisades Fire victims were age 55+. A thirty-two year old victim was disabled. Data for the six other victims is currently unknown. Considering nearly all of the LA fire victims were

[34] City of Santee. Real Estate Vegetation Management Inspections In Santee. https://www.cityofsanteeca.gov/fire-life-safety-services/fire-prevention/real-estate-vegetation-management-inspections

O6-4 cont.

seniors or disabled, the placement of 445 Senior Units Into the Cedar Fire corridor would be extremely negligent.[35] With firestorms increasing frequency and intensity, placement of Seniors into a designated Very High Fire Hazard Severity Zone is clearly a significant adverse impact to public safety.

Other Deficiencies in the 2nd Recirculated FREIR

O6-5

The project description is inadequate. Where are the proposed 445 Senior units on the site? Are the Senior Units spread throughout the residential footprint intermixed with other units? Are they to be located near the sewage treatment plant? Are they directly under the MCAS Miramar fixed-wing or rotary-wing flight paths? Are the Senior Units proposed for Fanita Mountain at the top of fire chimneys or other FM4 chaparral? A map should be presented which locates the proposed Senior Units along with a detailed description and environmental analysis of the revised project.

The EIR lacks specificity regarding population-level effects and long-term habitat viability for endangered or threatened species. It fails to sufficiently explore indirect impacts, such as noise and light pollution from increased human activity, on wildlife behavior and migration patterns. Where will the Senior Housing be located?

Alternatives other than a "No Project" alternative are not considered. A lower density alternative with fewer senior units, or no senior units should be considered. Alternatives that reduce or avoid the heavy reliance upon emergency response should be considered.

O6-6

The Summary distorts events, the law, and the decision of the court. It fails to disclose or discuss the qualified Referendum against the project approval or Measure N, which was inserted into the Santee General Plan by voters. It selectively presents the court's decision with arguments from respondents, distorting the court's direction.

Section 4.10 similarly distorts the "Regulatory Framework" and intent of the state legislature.

The analysis admits the project fails to meet requirements of the Santee General Plan's Guiding Principles/Essential Elements, but concludes

[35] The LA fire victims: Who they were. Los Angeles Times staff. February 12, 2025. https://www.latimes.com/california/story/2025-01-12/los-angeles-fire-eaton-palisades-altadena-victims

without foundation the impact of such failure is not significant. (Page 0-4, 0-5).

The document barely mentions Measure N in Table 0.1 and Appendix T (4.10.34) and errantly dismisses the significance of Measure N in the Santee General Plan.

The analysis fails to disclose the projects inconsistency with the Multiple Species Conservation Plan and fails to disclose that Santee has not adopted a subarea plan because of the project's inconsistencies, despite the existence of the approved regional framework plan since 1998. (4.10-9) It fails to disclose the inconsistency with State and Federal Endangered Species Acts and the State NCCP.

O6-6 cont.

The analysis fails to disclose the project's inconsistencies with required Guiding Principles.

The analysis errantly concludes the project would not physically divide an existing community. In fact, the massive traffic impacts of the project would significantly divide the community. Project generated traffic would discourage pedestrian and bicycle use in existing neighborhoods, to parks, schools and shopping and impede emergency evacuation.

The analysis fails to disclose the evidence current Guiding Principle/ Essential Element #3 was originally adopted by the Santee City Council in a special meeting in response to resident concerns over the numerous significant impacts of a 3,000-unit project. [36] [37]

O6-7

The EIR fails to disclose the project's smaller lots are an increase in density as described in Measure N because the amount of available land on the project site is further limited by resource constraints. The EIR fails to disclose the State and Federal Endangered Species Acts, the NCCP and MSCP limit the amount of land available for grading, which has direct bearing on the total number of units allowed by GP3. Contrary to the EIR conclusion, failure to be consistent with GP3 is a significant environmental impact.

The EIR falsely claims "there is no density limitation the site established in the General Plan or Zoning Ordinances." (4.10-27) The smallest lots allowed on Fanita Ranch are 6,000 square feet and these lots are

[36] Sosa, Ninette. Developer gets mixed results on Fanita Ranch. September 20, 1995.

[37] Saint, Steven. The winding road to Fanita Ranch. The Santee Star. September 12, 1996.

23 of 31

O6-5: This comment states that the project description is inadequate and that an alternative other than the No Project is not considered. In addition, the comment states that the Final Revised EIR lacks specificity regarding population-level effects and long-term habitat viability for endangered or threatened species and does not explore indirect impacts, such as noise and light pollution from increased human activity, on wildlife behavior and migration patterns.

Please refer to Response to Comment O6-3 regarding the project description and refer to Thematic Response 1, Recirculation and Scope of Review Claims, regarding the other claims made in this comment.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

O6-6: This comment states that the Final Revised EIR fails to disclose or discuss the qualified referendum against the project approval or Measure N, which was inserted into the Santee General Plan by voters. Table 4.10-1 of the Second Recirculated Sections of the Final Revised EIR has been revised to address the policies adopted by Measure N—specifically, Objective 12.0 and Policies 12.1 through

O6-7 cont.

limited to 20% of the buildable acreage. The next 20% of lots are limited to 10,000 sq. ft. and the remaining 60% of lots are to be 20,000 sq. ft. or larger. These lot size limits are density limits because there is a finite amount of buildable land. The city council was fully aware the buildable land was limited when they adopted the lot size limits. Principle Planner and eventual Director of Development Services, Douglas Williford, stated the lot sizes would limit the development to approximately 1,200-1,300 units.[38] The 1998 project EIR included a 1,300-unit alternative considered to be consistent with the General Plan.

The analysis provides the false impression that a larger project footprint is a viable alternative. (4.10.26) The "compact footprint" is a given due to resource constraints. Even dismissing resource constraints and using a false assumption the site is without resource constrains, the General Plan still identifies the Fanita Ranch PDA as a finite "2,589 acres." GP3 does not require lots to be "spread over a larger development footprint in compliance with Guiding Principle 3." (4.10.26) It specifies required lot sizes for land potentially available to development.

The conclusion the Guiding Principles are "not mandatory development requirements" is false. Mandatory provisions were clearly delineated by use of the word "shall" which was used in GP3 at its adoption. Furthermore, the word shall was adopted with the clear title of the language as "Essential Elements." The developer's request to revise language in the Essential Elements with the word "may" was rejected.[39] City council members, city staff, the public and press all considered the language adopted by city council to be a requirement.[40] Later manipulation of the language title by a planner, while retaining the clear mandatory directive language in GP3 does not erase the mandatory direction of the Essential Elements/Guiding Principles. The revision of the title to "Guiding Principles" was a poor attempt to create a loophole.

The current density restriction was adopted by city council at hearings September 27, 1995 and October 11, 1995. Hal Ryan supported the larger lot restrictions to reduce "impact on local roads and schools." Jim Bartell voted no because he proposed a limit of 1,000 homes on

[38] Personal attendance of the public hearing and subsequent review of statements in the press. Also, subsequent ballot argument litigation.

[39] Sosa, Ninnette. Developer gets mixed results on Fanita Ranch. Santee Star. February 20, 1995. And personal knowledge from attending the hearing.

[40] Harpster, David. Santee slashes Fanita Ranch's units to 1200 - Council requires developer to add more luxury lots. SDUT. October 13, 1995.

12.4. Please refer to Thematic Response 3, No Public Vote Requirement.

The comment also states that the analysis fails to disclose the proposed project's inconsistency with the Multiple Species Conservation Plan. Section 4.10.5.2 of the Second Recirculated Sections of the Final Revised EIR discusses the proposed project's consistency with the Fanita Ranch Subunit of the City's Draft Multiple Species Conservation Program Subarea Plan.

The comment also states that the analysis fails to disclose the proposed project's inconsistencies with required Santee General Plan Guiding Principles. Section 4.10.5.2 of the Second Recirculated Sections of the Final Revised EIR discusses the proposed project's consistency with the Santee General Plan Guiding Principles. The analysis discloses that the proposed project would be inconsistent Guiding Principles 3 (lot size), 9 (golf course or recreational facility), and 14(e) (development agreement). The conflict must "cause a significant environmental impact" due to a conflict with a policy or regulation "adopted for the purpose of avoiding or mitigating an environmental effect" (California Public Resources Code, Section 21083; CEQA Guidelines 15063[a]). Therefore, the review of local land use plans, including the Santee General Plan, indicated that the proposed project would generally not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or

O6-7

the land to reduce significant impacts. Avoiding significant traffic impacts of a large development was specifically expressed by city council members and the public who expressed concerns about noise, traffic, fire, water, biology and aesthetic impacts.[41] Reference Santee's MSCP Draft Preserve Boundary Map amended and presented by Preserve Wild Santee.[42] Avoidance of fire safety impacts was discussed by editorial as early as March, 1995.[43] The EIR conveniently omits this history and falsely claims it doesn't exist.

Fire Inspectors must balance fire risk with flood risk

Homes compliant with PRC 4291 are still vulnerable to fires and floods because inspectors must use their experience and judgement to balance the fire and flood risks to inspected homes and to their adjacent neighbors.

O6-8

Varied topography, such as on Fanita Ranch, makes achieving an effective balance challenging for each site within the Very High Hazard Zone. A home is compliant if fuels are "maintained and spaced in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure…Consistent with fuels management objectives, steps should be taken to minimize erosion, soil disturbance, and the spread of flammable nonnative grasses and weeds." (PRC 4291)

Balancing risks leaves homes vulnerable to extreme fire weather and extreme precipitation, which is increasing in frequency and severity. This vulnerability is built into any development within a Very High Fire Hazard Severity Zone. Home spacing density which facilitates structure-to-structure fire spread markedly increases the overall vulnerability of the development. Therefore, the decision to introduce inadequate space between structures is a significant and avoidable adverse impact to public safety. The significant adverse impact is magnified when a less mobile, more dependent population is introduced with senior housing.

O6-9

Conclusion

[41] Sosa, Ninette. Council caps Fanita at 1,500 homes. The Santee Star. October 12, 1995.

[42] City of Santee's Draft Preserve Boundaries - Exhibit A. Map as amended by Preserve Wild Santee. 1995

[43] Thompson, Frank. Fanita Ranch development will make it tough for the firefighters. East County Californian. March 22, 1995.

25 of 31

mitigating an environmental effect. Impacts would be less than significant. Moreover, as discussed in Section 4.10 of the Second Recirculated Sections of the Final Revised EIR, the application of waivers through the state Density Bonus Law and the Essential Housing Program eliminates any inconsistency between the proposed project and the Santee General Plan Guiding Principles referenced above.

Finally, the comment states that proposed project's traffic impacts would divide the community and discourage pedestrian and bicycle use in existing neighborhoods. As discussed in Section 4.10.5.1, proposed roadways would connect the project site to established communities in the vicinity, rather than separate them. A proposed extension of Fanita Parkway and Cuyamaca Street would connect the project site to the existing residential development to the south. The proposed project also proposes to construct Magnolia Avenue from its current terminus to the extension of Cuyamaca Street just south of the project site. In addition, implementation of the proposed project would formalize permanent public access trails, trailheads, and staging areas. The proposed project includes more than 35 miles of multimodal public trails allowing access for pedestrians and bicyclists throughout the site and would provide connections to the City center and regional trails. Thus, the proposed trail system would provide enhanced connectivity to existing trails on and near the project site.

O6-9 cont.

The latest scheme intended to bypass Santee voters should be abandoned. Recent urban conflagration wildfires and global heat records provide significant new information CEQA requires to be considered. Designation of 445 Senior Units has significant adverse impacts to public health and safety which have not been avoided, or disclosed and mitigated to below a level of significance.

Sincerely,

/s/

Van K. Collinsworth, Director/Physical Geographer/Fire Professional

Relevant Professional Qualifications:

1980-1993. United States Forest Service, Wildland Firefighter

Fought wildfires from the Mexican border to the Canadian border in the Western United States performing on engine and hand line crews. Performed in supervisory roles on large incidents, squad/crew supervisor, Assistant to Operations and Air Operations Chiefs. Executed backfiring operations. Executed prescription burns.

2016-2025. California Division of Forestry & Fire Protection, CAL FIRE Inspector

O6-10

Conducted well over 18,500 documented fire inspections within State Responsibility Areas since establishment of a digital inspection program in 2017 (the largest number of Defensible Space Inspections among CAL FIRE Inspectors on the San Diego Unit and in the State of California issuing non-compliance notices and conducting re-inspections for compliance).

Established Incident Commands and assisted Incident Commanders on wildfire and other incidents in San Diego County. Assisted the Sheriff's Department, CHP in evacuations, road closures and restricted traffic flows. Identified at risk elderly residents and directed engine resources to assist during wildfire incidents. Identified lightning strike fires. Reviewed wildfire damaged structures. Monitored Vegetative Management Program burns. Trained firefighters and new inspectors on Field Maps inspection procedures.

1995-2025. Geographer

Reviewed environmental documents. Monitored implementation of mitigation measures.

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O6-7: The comment states that failure to be consistent with Guiding Principle 3 is a significant environmental impact. As discussed in Section 4.10.5.2 of the Second Recirculated Sections of the Final Revised EIR, although the proposed project does not meet the exact requirements of Guiding Principle 3 (lot size), the mere inconsistency with a plan, policy, or regulation does not mandate a significance finding. The conflict must "cause a significant environmental impact" due to a conflict with a policy or regulation "adopted for the purpose of avoiding or mitigating an environmental effect" (California Public Resources Code, Section 21083; CEQA Guidelines 15063[a]). There is no evidence that Guiding Principle 3 was adopted to avoid or mitigate an environmental effect. Greater density can increase certain impacts while decreasing others and providing much-needed housing. Here, the significantly reduced footprint of the proposed project would avoid effects associated with a larger development footprint, such as increased impacts associated with grading, erosion, biological resources, cultural resources, geological resources, construction emissions (including air quality and greenhouse gases), and other effects. Consequently, the proposed project's inconsistency with Guiding Principle 3 would likely not result in greater significant impacts overall in comparison to a project with larger lots spread over a larger development footprint in compliance with Guiding

O6-10 cont.

Attachments: Footnote Evidence & Other References

Other References Attached:

Preserve Wild Santee Fanita Ranch FREIR Comment Letter. July 25, 2022. (Inadequate responses)

Studying the impact of climate change on older adult health and well-being. https://www.nia.nih.gov/research/blog/2022/04/studying-impact-climate-change-older-adult-health-and-well-being

2025 US Wildfire Statistics. https://www.bankrate.com/insurance/homeowners-insurance/wildfire-statistics/#fire-damage-restoration

California FAIR Plan Insurance/ What It Is and How It Works | Bankrate. https://www.bankrate.com/insurance/homeowners-insurance/california-fair-plan/

After wildfires, hundreds of thousands of Californians can't get insurance - CBS News. https://www.cbsnews.com/news/wildfires-california-homeowners-insurance-hard-to-find-due-to-magnitude-of-massive-wildfires/

Climate Disruption & Wildfire

Total Wildland Fires and Acres (1983-2024). https://www.nifc.gov/fire-information/statistics/wildfires

Indicators of Climate Change in California - Air Temperatures. https://oehha.ca.gov/climate-change/epic-2022/changes-climate/air-temperatures

Wildland firefighter deaths in the United States… https://pmc.ncbi.nlm.nih.gov/articles/PMC5702908/

Wildfires and WUI Fire Fatalities. https://www.fs.usda.gov/rm/pubs_journals/2020/rmrs_2020_haynes_k001.pdf

The return of conflagration in our built environment. https://ibhs.org/wp-content/uploads/Suburban_Wildfire_Conflagration_WhitePaper.pdf

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Principle 3. Rather, the compact footprint of the proposed project is likely to reduce, rather than increase, overall adverse environmental impacts (see California Public Resources Code, Section 21083[b]). Therefore, the Second Recirculated Sections of the Final Revised EIR concluded that the proposed project would not result in significant environmental impacts due to conflicts with the Santee General Plan Guiding Principles specifically adopted to avoid or mitigate environmental effects. Moreover, as discussed in Section 4.10 of the Second Recirculated Sections of the Final Revised EIR, the application of waivers through the state Density Bonus Law and the Essential Housing Program eliminates any inconsistency between the proposed project and the Santee General Plan Guiding Principles referenced above.

O6-8: The comment states that the decision to introduce inadequate space between structures is a significant and avoidable adverse impact to public safety and is magnified when a less mobile, more dependent population is introduced with senior housing. Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk.

O6-9: This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

O6-10 cont.

Five years on since the California"s Camp fire: The fate of Paradise. https://www.moodys.com/web/en/us/insights/insurance/five-years-on-since-californias-camp-fire-the-fate-of-paradise.html

How we analyzed the risk wildfires pose to older people - CalMatters. https://calmatters.org/projects/older-californians-increased-risk-wildfires/

Wildland Fire Summary and Statistics Annual Report 2024. NICC . https://www.nifc.gov/sites/default/files/NICC/2-Predictive Services/Intelligence/Annual Reports/2024/annual_report_2024.pdf

Wildland Fire Summary and Statistics Annual Report 2023. NICC. https://www.nifc.gov/sites/default/files/NICC/2-Predictive Services/Intelligence/Annual Reports/2023/annual_report_2023_0.pdf

Wildland Fire Summary and Statistics Annual Report 2022. NICC. https://www.nifc.gov/sites/default/files/NICC/2-Predictive Services/Intelligence/Annual Reports/2022/annual_report.2.pdf

Are major natural disaster increasing? Nine out of the 10 years with the highest number of natural disasters occurred in the last decade. USA Facts. https://usafacts.org/articles/are-the-number-of-major-natural-disasters-increasing/

Background on: Wildfires. Insurance Information Institute. https://www.iii.org/article/background-on-wildfires

Key Messages California-StateClimateSummary2022. https://statesummaries.ncics.org/downloads/California-StateClimateSummary2022.pdf

Climate Change Indicators/ Wildfires | US EPA. https://www.epa.gov/climate-indicators/climate-change-indicators-wildfires

Deaths due to wildfires in the U.S. 2023 | Statista. https://www.statista.com/statistics/1422130/usa-number-of-deaths-due-to-wildfires/#:~:text=Wildfires resulted in 130 deaths in the United States in 2023.

Facts + Statistics/ Wildfires | III Insurance Information Institute. https://www.iii.org/fact-statistic/facts-statistics-wildfires#:~:text=California Wildfires (1)-,Key Facts,consumed by fire that year.

New Data Confirms/ Forest Fires Are Getting Worse | World Resources Institute https://www.wri.org/insights/global-trends-forest-fires

O6-10: This comment provides the qualifications of the commenter and several attachments. These attachments are used as references to the aforementioned comment letter.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

O6-10 cont.

Wildfires and Climate Change - Center for Climate and Energy SolutionsCenter for Climate and Energy. https://www.c2es.org/content/wildfires-and-climate-change/

Marshall Fire

Wind-driven wildfire burns hundreds of homes near Boulder, Colorado - Wildfire Today. https://wildfiretoday.com/2021/12/30/wind-driven-wildfire-burns-homes-near-boulder-colorado/

Marshall Fire Archives - Page 2 of 3 - Wildfire Today. https://wildfiretoday.com/tag/marshall-fire/page/2/

Marshall Fire Archives - Page 3 of 3 - Wildfire Today. https://wildfiretoday.com/tag/marshall-fire/page/3/

Marshall Fire Mitigation Assessment Team: Decreasing Risk of Structur-toStructure Fire Spread in a Wildfire https://www.fema.gov/sites/default/files/documents/fema_marshall-fire-mat-decreasing-structure-fire-spread.pdf

Marshall Fire Mitigation Assessment Team: Best Practices for Wildfire-Resilient Planning. FEMA (deleted)

Marshall Fire Mitigation Assessment Team: Homeowner's Guide to Reducing Wildfire Risk Through Defensible Space. FEMA (deleted)

Marshall Fire Mitigation Assessment Team: Building Performance, Observations, Recommendations, and Technical Guidance. FEMA (deleted)

FEMA Mitigation Assessment Team Releases First Report in the Aftermath of a Wildfire - Marshall Fire. https://www.usfa.fema.gov/blog/fema-mitigation-assessment-team-releases-first-report-in-the-aftermath-of-a-wildfire/

When Will Los Angeles Rebuild? Comparing Housing Recovery Timelines after Four Recent Wildfires | Urban Institute. https://www.urban.org/urban-wire/when-will-los-angeles-rebuild-comparing-housing-recovery-timelines-after-four-recent

Wildfire Destruction during the March/April 2025 Recirculated EIR Review Period

National Fire News | National Interagency Fire Center. March 14, 2025.

O6-10 cont.

National Fire News | National Interagency Fire Center. March 28, 2025 https://www.nifc.gov/fire-information/nfn

At least 13 dead in crashes during dust storms; homes destroyed in Oklahoma wildfires - ABC News. https://abcnews.go.com/US/wildfires-oklahoma-texas-amid-extreme-fire-weather-conditions/story?id=119811373

Fires ravage Oklahoma leading to disaster declaration in 12 counties, hundreds of homes lost | KOSU. https://www.kosu.org/local-news/2025-03-15/fires-ravage-oklahoma-leading-to-disaster-declaration-in-12-counties-hundreds-of-homes-lost

Evacuation

Preparing for wildfire evacuation and alternatives: Exploring influences on residents' intended evacuation behaviors and mitigations. https://www.sciencedirect.com/science/article/pii/S2212420921001436

Evacuation decision-making and behavior in wildfires/ Past research, current challenges and a future. https://www.sciencedirect.com/science/article/abs/pii/S0379711220302204

Systematic review and research gaps on wildfire evacuations infrastructure transportation modes networks and planning. https://www.tandfonline.com/doi/full/10.1080/03081060.2024.2348713

Wildfires and Older Adults: A Scoping Review of Impacts, Risks, and Interventions. Int J Environ Res Public Health. 2023 Jun 29;20(13):6252. Melton CC, De Fries CM, Smith RM, Mason LR. https://pubmed.ncbi.nlm.nih.gov/37444100/

40 Acres Community Wildfire Protection Plan. April 2023. https://www.inyocounty.us/sites/default/files/2023-07/40 Acres_Combined.pdf

These San Diego areas are now considered 'very high fire hazard' zones by CAL FIRE. Fox News. https://fox5sandiego.com/news/local-news/these-san-diego-areas-now-considered-very-high-fire-hazard-zones-by-cal-fire/

How Santa Ana winds fueled the deadly wildfires in Southern California. Jon Keeley. UCLA .https://www.universityofcalifornia.edu/news/how-santa-ana-winds-fueled-deadly-fires-southern-california

O6-10 cont.

State of California Public Resource Code Section 4291

CAL FIRE Property Inspection Guide

Genasys Protect Guide & Flyer. https://protect.genasys.com/

Santee Council Agenda Statement, Meeting Date April 9, Item 10: PRESENTING THE SANTEE FIRE HAZARD SEVERITY ZONE MAP AS RECOMMENDED BY CAL FIRE FOR PUBLIC COMMENT AND ASK CITY COUNCIL TO RECEIVE THE REPORT AND PROVIDE STAFF DIRECTION. https://www.cityofsanteeca.gov/documents/city-clerk/council-agendas/2025/04-09-2025-agenda-packet.pdf

Palisades Fire. CAL FIRE https://www.fire.ca.gov/incidents/2025/1/7/palisades-fire

Eaton Fire. CAL FIRE https://www.fire.ca.gov/incidents/2025/1/7/eaton-fire

Letter, Preserve Wild Santee. July 24, 2022

Letter, Preserve Wild Santee. September 23, 2020

Letter, Preserve Wild Santee. June, 26, 2009

Letter, Preserve Wild Santee. December 15, 2018

Lahaina Forward Looking Report

CAO Letter to the San Diego County Board of Supervisors, May 22, 2024, Minute Order, Resolution, Wildfire Guidelines

County of San Diego Wildfire Protection Plan Staff Report, October 14, 2023

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Comment Letter O7: Preserve Wild Poway, April 10, 2025

From: Sandi Sawa
To: Marni Borg
Subject: FW: Opposition Letter to the Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 10, 2025 12:36:58 PM
Attachments: Fanita Ranch Opposition Letter- April 9, 2025.pdf
image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Lori Grennan <lgrennan1@gmail.com>
Sent: Thursday, April 10, 2025 12:23 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>; Ronn Hall <RonnHall@CityofSanteeCa.gov>; Dustin Trotter <DTrotter@CityofSanteeCa.gov>; Laura Koval <LKoval@CityofSanteeCa.gov>; John Minto <JMinto@CityofSanteeCa.gov>; Clerk <clerk@cityofsanteeca.gov>
Subject: RE: Opposition Letter to the Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sandi Sawa, Mayor and Council Members,

Attached is a letter in opposition to the new senior housing proposal for Fanita Ranch.

We look forward to hearing that you will vote the proposal down and support the court and your voters' decision to protect human life and endangered wildlife from wildlifes.

Best wishes,

Lori Grennan
Board Chairperson, Preserve Wild Poway
Poway, CA 92064

O7

O7-1: The comment requests acknowledgment of the court's decision and Santee voters' right to control zoning of the Fanita Ranch Project (proposed project). It also expresses concern with the proposed project placing homes in a high-severity fire zone and destroying endangered habitat and wildlife corridors.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

April 9, 2025

Sandi Sawa, AICP, Director of Planning & Building
Cc: Santee Mayor and City Council

Subject: Opposition Letter to the Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sandi Sawa, Mayor and City Council Members,

Please respect the court's decision and Santee voters' rights to control the zoning of Fanita Ranch. You must reject the dangerous new proposal to bypass Santee voters.

O7-1 Residents and builders in San Diego County are watching your decision on Fanita Ranch. This decision will set a precedent for whether or not lives and wildlife will be protected, or whether builders will be allowed loopholes to skirt around the court and voters. Your decision will not only cause the City of Santee to risk thousands of lives in a high severity fire zone and destroy endangered habitat, but will open the door for other cities to do the same. Therefore, your decision risks human life and endangered habitat within the county. Please stop this from occurring, with a decisive decision in Santee.

Besides the extreme wildfire danger to human life, this 2,000 acre parcel is full of rare and endangered habitat, the Coastal sage scrub. Unfortunately, Southern California's Coastal sage scrub is down to only 10-15% left from historic levels. It is the most endangered habitat in the Continental United States. Fajita Ranch is also vital to wildlife corridors, allowing wildlife movement within the surrounding areas of: Lakeside, Poway, Ramona, Escondido and Julian. This proposed project not only affects the species in Santee, but throughout this region.

Please make sure you vote this dangerous housing project down and let the voices of Santee voters be heard. With a no vote, San Diego County residents, everywhere, will hear your decision loud and clear and breathe a sigh of relief, knowing Santee's City Council upheld the court's decision and listened to their voters.

O7-1 cont.

We hope you make the decision to uphold the law, defend the voices of residents and protect endangered species. Thank you.

Warmest regards,

Lori Grennan
Board Chairperson, Preserve Wild Poway
Poway, CA 92064

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Comment Letter O8: Santee Chamber of Commerce, April 16, 2025

From: Sandi Sawa
To: Marni Borg
Subject: Fw: Fanita Ranch Support
Date: Wednesday, April 16, 2025 3:05:34 PM

From: Kristen Dare <dare@santeechamber.com>
Sent: Wednesday, April 16, 2025 2:24:33 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch Support

Good Afternoon Sandi,
On behalf of the Santee Chamber of Commerce, I am writing to express our strong support for the proposed Fanita Ranch development. This visionary project promises to bring substantial economic and social benefits to our city and the broader region.

The development of Fanita Ranch is projected to introduce approximately 2,949 new residential units, significantly enhancing our housing stock and accommodating the growing demand for diverse housing options. This increase in housing is anticipated to attract new residents who will contribute to the local economy through increased demand for goods, services, and amenities. Consequently, local businesses are likely to experience growth, leading to higher sales tax revenues. Additionally, the introduction of retail spaces and office areas within the development is expected to create job opportunities, further stimulating economic activity. These developments are projected to result in increased property and sales tax revenues, bolstering the city's fiscal health and enabling reinvestment into community services and infrastructure.
Beyond economic considerations, Fanita Ranch is designed with a focus on community well-being. The plan includes a pedestrian-friendly center featuring retail shops, restaurants, offices, and a K-8 school, fostering a vibrant community hub. The development also proposes over 1,600 acres of open space, with almost 30 miles of trails, promoting recreational opportunities and enhancing the quality of life for residents. Improvements to local infrastructure, such as enhancements to Fanita Parkway, Cuyamaca Street, and Magnolia Avenue, are also part of the project, aiming to improve traffic flow and accessibility.

The Santee Chamber of Commerce believes that the Fanita Ranch development aligns with our city's goals for sustainable growth, economic vitality, and enhanced community amenities. We are confident that this project will serve as a catalyst for positive change, benefiting residents and businesses alike. We respectfully urge the City Council to approve the necessary measures to bring this transformative project to fruition.
Thank you for your consideration.

O8-1

O8

O8-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

O8-1 cont.

Thank You,
Kristen Dare, ACE
Interim President/CEO, Santee Chamber of Commerce
278 Town Center Parkway, Suite 202, Santee, CA 92071
Office: 619.449.1515 | Cell: 619.922.1031

Comment Letter I1: Walter Schmidke, February 22, 2025

From: WALTER SCHMIDTKE
To: Sandi Sawa; Rowena Parravano
Cc: Marni Borg; Jamie Bryan
Subject: Re: Notice of Availability Fanita Second Recirculated Sections of the Final REIR
Date: Saturday, February 22, 2025 11:19:35 AM
Attachments: image001.png

I1-1 Received, thank you.
You can remove me from your email, we have moved out of California

On Friday, February 21, 2025 at 02:13:58 PM MST, Rowena Parravano <rparravano@cityofsanteeca.gov> wrote:

Hello,
Attached is an electronic version of the Notice of Availability for the Second Recirculated Sections of the Final REIR for Fanita Ranch. You are receiving this communication because you expressed an interest in the Fanita Ranch project.
If you have any questions concerning this project you may contact Sandi Sawa at (619) 258-4100, extension 167 or at ssawa@cityofsanteeca.gov.
Respectfully,
Rowena Parravano

Rowena Parravano
Administrative Secretary
Engineering Department
Planning & Building Department
(619) 258-4100 x 167
rparravano@cityofsanteeca.gov

I1

I1-1: This comment acknowledges receipt of the Notice of Availability for the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project (proposed project) and asks to be removed from the email list.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. No further response is required.

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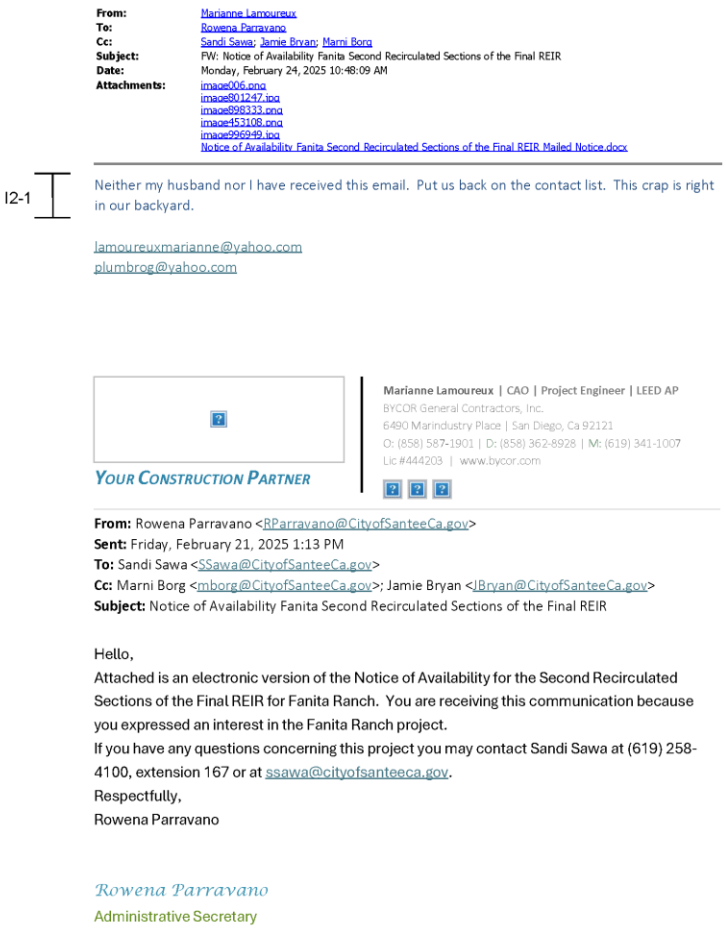
Comment Letter I2: Marianne Lamoureux, February 24, 2025



From: Marianne Lamoureux
To: Rowena Parravano
Cc: Sandi Sawa; Jamie Bryan; Marni Borg
Subject: FW: Notice of Availability Fanita Second Recirculated Sections of the Final REIR
Date: Monday, February 24, 2025 10:48:09 AM
Attachments: image006.png
image801247.jpg
image898333.png
image453108.png
image996949.jpg
Notice of Availability Fanita Second Recirculated Sections of the Final REIR Mailed Notice.docx

I2-1

Neither my husband nor I have received this email. Put us back on the contact list. This crap is right in our backyard.

lamoureuxmarianne@yahoo.com
plumbrog@yahoo.com

YOUR CONSTRUCTION PARTNER

Marianne Lamoureux | CAO | Project Engineer | LEED AP
BYCOR General Contractors, Inc.
6490 Marindustry Place | San Diego, Ca 92121
O: (858) 587-1901 | D: (858) 362-8928 | M: (619) 341-1007
Lic #444203 | www.bycor.com

From: Rowena Parravano <RParravano@CityofSanteeCa.gov>
Sent: Friday, February 21, 2025 1:13 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Marni Borg <mborg@CityofSanteeCa.gov>; Jamie Bryan <JBryan@CityofSanteeCa.gov>
Subject: Notice of Availability Fanita Second Recirculated Sections of the Final REIR

Hello,
Attached is an electronic version of the Notice of Availability for the Second Recirculated Sections of the Final REIR for Fanita Ranch. You are receiving this communication because you expressed an interest in the Fanita Ranch project.
If you have any questions concerning this project you may contact Sandi Sawa at (619) 258-4100, extension 167 or at ssawa@cityofsanteeca.gov.
Respectfully,
Rowena Parravano

Rowena Parravano
Administrative Secretary

I2

I2-1: This comment requests to be added to the contact list for the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. No further response is required.

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Comment Letter I3: Alisa Dunlap, February 25, 2025

I3

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch - Alisa Dunlap
Date: Tuesday, February 25, 2025 2:55:35 PM
Attachments: image001.png
image002.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

From: Wendy Stratton <wstratton@CityofSanteeCa.gov>
Sent: Tuesday, February 25, 2025 2:12 PM
To: Marlene Best <mbest@CityofSanteeCa.gov>; Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: FW: Fanita Ranch - Alisa Dunlap

Hello,
Please see the email below.
Wendy Stratton
Confidential Secretary
City Council and City Manager's Office
(619) 258-4100, Ext. 295

From: Oda-DesHotels, Miyu <Miyu.Oda@sdcounty.ca.gov>
Sent: Tuesday, February 25, 2025 12:49 PM
To: Wendy Stratton <wstratton@CityofSanteeCa.gov>
Subject: Fanita Ranch - Alisa Dunlap

I3-1 Hi Wendy,

We received the following.

I3-1: This comment expresses concern for voting related to the Fanita Ranch Project (proposed project).

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I3-1 cont.

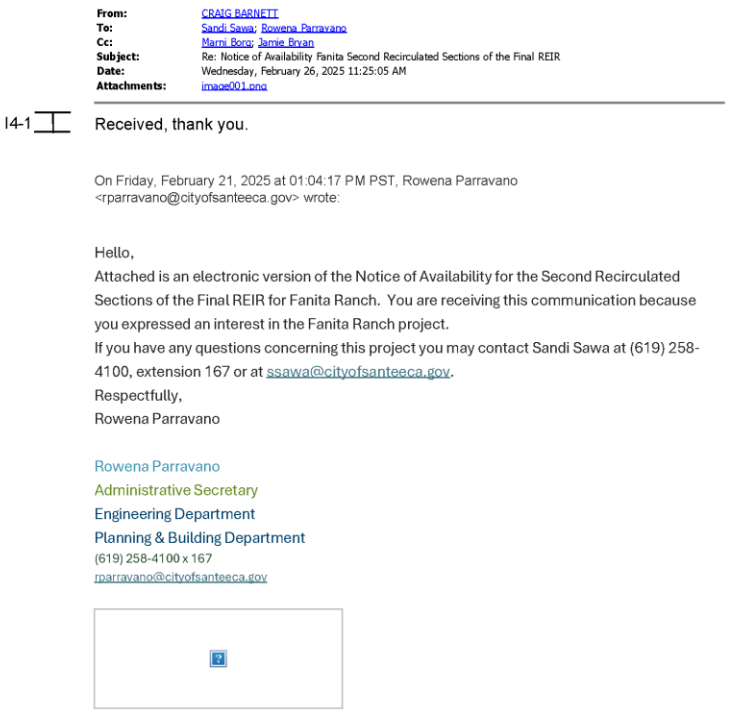
Fanita Ranch
Alisa Dunlap
ajdunlap2@yahoo.com
10442 Len Way Santee, CA 92071-4934
I am wonder as a voter in Santee the residents voted not to have Fanita Ranch, the courts said they cannot build Fanita Ranch. How is the Santee City Counsil still trying to get this built.

Warm regards,

Miyu Oda-Deshotels, MPA
Constituent Services Manager & Policy Aide
Supervisor Joel Anderson – District 2
Direct: (619) 705-9601
Email: Miyu.Oda@sdcounty.ca.gov

Comment Letter I4: Craig Barnett, February 26, 2025

I4



From: CRAIG BARNETT
To: Sandi Sawa; Rowena Parravano
Cc: Marni Borg; Jamie Bryan
Subject: Re: Notice of Availability Fanita Second Recirculated Sections of the Final REIR
Date: Wednesday, February 26, 2025 11:25:05 AM
Attachments: image001.png

I4-1 Received, thank you.

On Friday, February 21, 2025 at 01:04:17 PM PST, Rowena Parravano <rparravano@cityofsanteeca.gov> wrote:

Hello,
Attached is an electronic version of the Notice of Availability for the Second Recirculated Sections of the Final REIR for Fanita Ranch. You are receiving this communication because you expressed an interest in the Fanita Ranch project.
If you have any questions concerning this project you may contact Sandi Sawa at (619) 258-4100, extension 167 or at ssawa@cityofsanteeca.gov.
Respectfully,
Rowena Parravano

Rowena Parravano
Administrative Secretary
Engineering Department
Planning & Building Department
(619) 258-4100 x 167
rparravano@cityofsanteeca.gov

I4-1: This comment acknowledges receipt of the Notice of Availability for the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. No further response is required.

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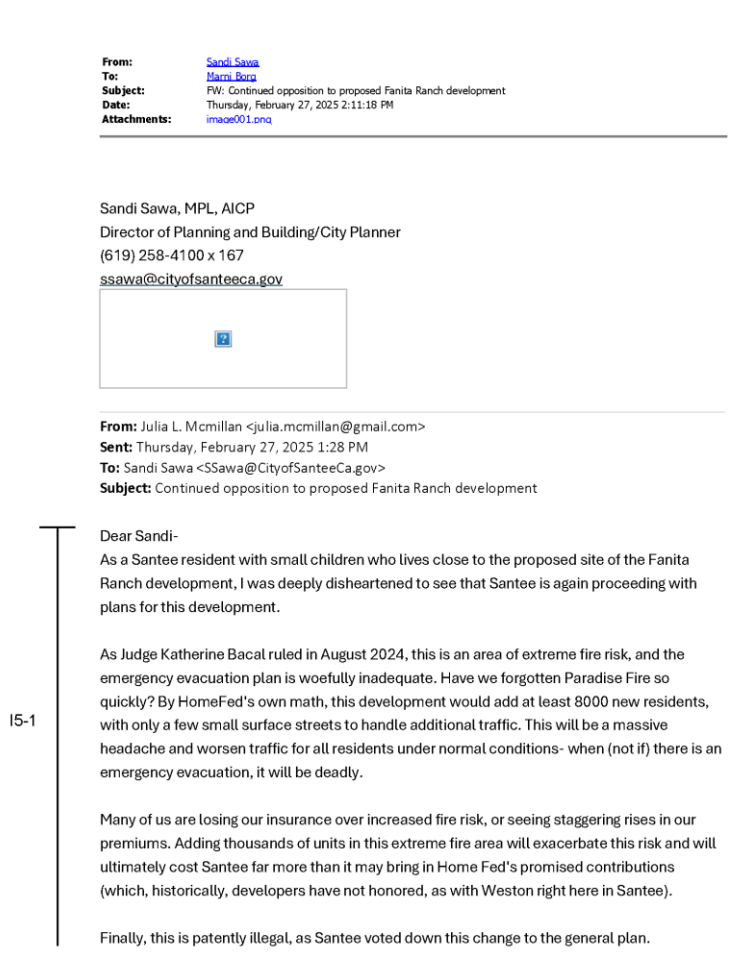
Comment Letter I5: Julia McMillan, February 27, 2025



From: Sandi Sawa
To: Marni Borg
Subject: FW: Continued opposition to proposed Fanita Ranch development
Date: Thursday, February 27, 2025 2:11:18 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

From: Julia L. Mcmillan <julia.mcmillan@gmail.com>
Sent: Thursday, February 27, 2025 1:28 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Continued opposition to proposed Fanita Ranch development

Dear Sandi-
As a Santee resident with small children who lives close to the proposed site of the Fanita Ranch development, I was deeply disheartened to see that Santee is again proceeding with plans for this development.

As Judge Katherine Bacal ruled in August 2024, this is an area of extreme fire risk, and the emergency evacuation plan is woefully inadequate. Have we forgotten Paradise Fire so quickly? By HomeFed's own math, this development would add at least 8000 new residents, with only a few small surface streets to handle additional traffic. This will be a massive headache and worsen traffic for all residents under normal conditions- when (not if) there is an emergency evacuation, it will be deadly.

Many of us are losing our insurance over increased fire risk, or seeing staggering rises in our premiums. Adding thousands of units in this extreme fire area will exacerbate this risk and will ultimately cost Santee far more than it may bring in Home Fed's promised contributions (which, historically, developers have not honored, as with Weston right here in Santee).

Finally, this is patently illegal, as Santee voted down this change to the general plan.

I5-1

I5

I5-1: The comment discusses extreme fire risk, insurance changes due to increased fire risk, and traffic under normal and emergency conditions that could result from implementation of the Fanita Ranch Project (proposed project). The comment also states that the City of Santee (City) already voted down this change to the Santee General Plan.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I5-1 cont.

Thank you for your continued opposition to this terrible idea.

Best,
Julia McMillan
9225 Penmar Road
Santee CA 92071

Comment Letter I6: Laura Poore, February 28, 2025

From: Sandi Sawa
To: Marni Borg
Subject: FW: No to Fanita Ranch!
Date: Saturday, March 1, 2025 7:36:41 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

From: Laura Poore <poorelm@yahoo.com>
Sent: Friday, February 28, 2025 6:57 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: No to Fanita Ranch!

Hello-

I6-1 As a long time resident of Santee who lives north of Cuyamaca, I am aware of the incredibly negative impact the potential Fanita Ranch development would have on my life, safety, and community. As voters, we have voted against this project repeatedly, and it has also legally been determined to be unsafe and irresponsible. It endangers our unique and sensitive wildlife and their habitat. Please hear the residents rather than the pocketbooks of the investors and help us keep our community safe and desirable to live in by not allowing this project to move forward. This development should be cancelled permanently rather than recycled in a new manner. Thank you for your attention to this matter.

Laura Poore

I6

I6-1: The comment states that the Fanita Ranch Project (proposed project) would impact the community and wildlife habitat. It also notes that the City of Santee's voters have voted against the proposed project.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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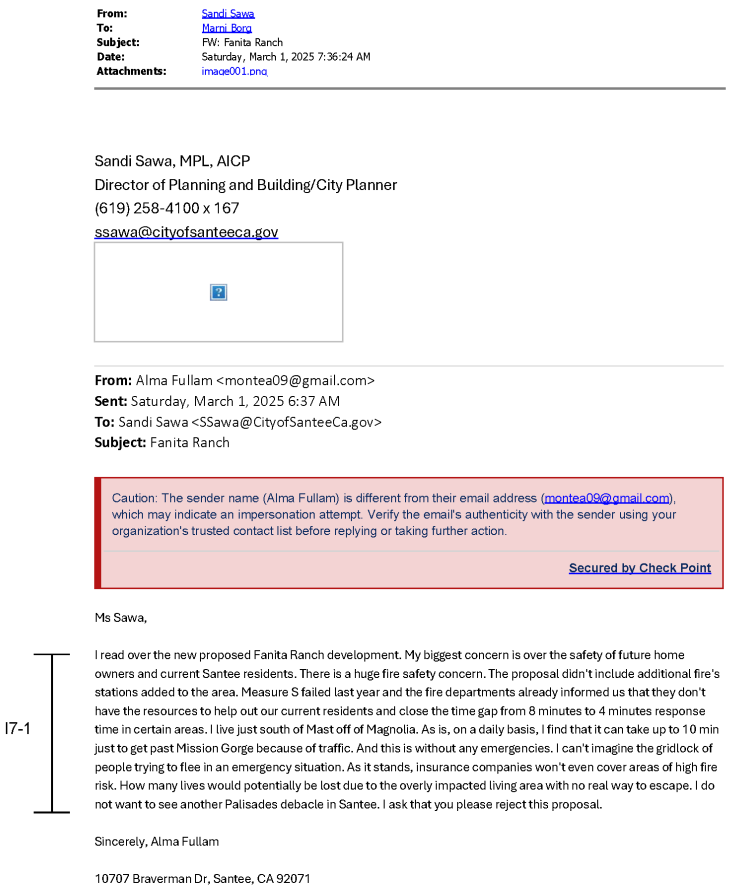
Comment Letter I7: Alma Fullam, March 1, 2025

I7



From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch
Date: Saturday, March 1, 2025 7:36:24 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

From: Alma Fullam <montea09@gmail.com>
Sent: Saturday, March 1, 2025 6:37 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch

Caution: The sender name (Alma Fullam) is different from their email address (montea09@gmail.com), which may indicate an impersonation attempt. Verify the email's authenticity with the sender using your organization's trusted contact list before replying or taking further action.

Secured by Check Point

Ms Sawa,

I7-1

I read over the new proposed Fanita Ranch development. My biggest concern is over the safety of future home owners and current Santee residents. There is a huge fire safety concern. The proposal didn't include additional fire's stations added to the area. Measure S failed last year and the fire departments already informed us that they don't have the resources to help out our current residents and close the time gap from 8 minutes to 4 minutes response time in certain areas. I live just south of Mast off of Magnolia. As is, on a daily basis, I find that it can take up to 10 min just to get past Mission Gorge because of traffic. And this is without any emergencies. I can't imagine the gridlock of people trying to flee in an emergency situation. As it stands, insurance companies won't even cover areas of high fire risk. How many lives would potentially be lost due to the overly impacted living area with no real way to escape. I do not want to see another Palisades debacle in Santee. I ask that you please reject this proposal.

Sincerely, Alma Fullam

10707 Braverman Dr, Santee, CA 92071

I7-1: The comment expresses concern for the fire safety of potential homeowners of the Fanita Ranch Project (proposed project) and current Santee residents. It also expresses concern regarding traffic conditions under both the existing conditions and potential emergency conditions under proposed project buildout.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I8: Joseph McCormick, March 19, 2025

I8

From: Alex Gould
To: Marni Bono; Sandi Sawa
Cc: Bree Osborne
Subject: Fw: You have a new Fanita Ranch Public Comment survey response!
Date: Wednesday, March 19, 2025 9:16:21 AM
Attachments: Outlook-idpaygqq.png

Hi Marni and Sandi,

We received a public comment for Fanita Ranch. See below.

Alex Gould
Marketing Specialist I
(619) 258-4100
Sign Up for E-Notifications

From: Mailchimp Account Services <accountservices@mailchimp.com>
Sent: Wednesday, March 19, 2025 9:12 AM
To: Alex Gould <AGould@CityofSanteeCa.gov>; Bree Osborne <BOsborne@cityofsanteeca.gov>
Subject: You have a new Fanita Ranch Public Comment survey response!

Mailchimp

You have a new survey response from a contact in your audience, "City of Santee".

Joseph McCormick wrote:

> Name
Joseph McCormick
> Email
mccormick1@cox.net
> Comment
Absolutely ridiculous that this is still happening. Our Mayor, who's only opposition last race was a 19 year old who thought running unopposed was crazy.

I8-1

I8-1: This comment expresses concern for existing congestion and traffic related to the Fanita Ranch Project (proposed project). The comment also discusses Santee residents' lack of voting.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I8-1 cont.

> This was a decent idea 25 years ago but everything has changed. We can't get our kids to school in the morning. Morning freeway traffic exits freeway to drive through Santee just to enter freeway again clogging our streets. Intersections become congested the with people blocking Intersections and you want to approve over 6,000 cars daily to this? The people have spoken so why haven't we been heard? Nothing about this project makes sense. No member of the council can can seem to articulate a response to defend your actions other than standard pre determined responses. Mayor Minto response included and kept using the word "because" as he couldn't come up with a legitimate way to defend the project. We reject this project and I hope your back door policies blow up big time.

What's really sad is how few Santee residents voted or got involved in our city politics. I think it gives our city council a message of the people don't care so why should they, let's do what we want. I personally think our latest council members are afraid of the developer suing them if project is denied. The development has been in question for decades yet investors still pursue it and that should be at their expense and not ours. I strongly oppose this project.

View Message

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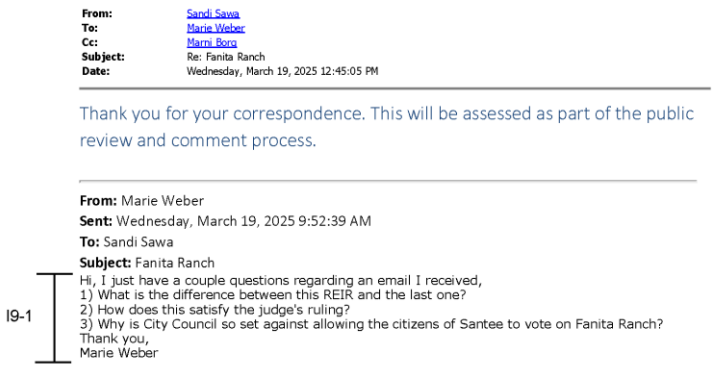
Comment Letter I9: Marie Weber, March 19, 2025



From: Sandi Sawa
To: Marie Weber
Cc: Marni Borg
Subject: Re: Fanita Ranch
Date: Wednesday, March 19, 2025 12:45:05 PM

Thank you for your correspondence. This will be assessed as part of the public review and comment process.

From: Marie Weber
Sent: Wednesday, March 19, 2025 9:52:39 AM
To: Sandi Sawa
Subject: Fanita Ranch

I9-1

Hi, I just have a couple questions regarding an email I received,
1) What is the difference between this REIR and the last one?
2) How does this satisfy the judge's ruling?
3) Why is City Council so set against allowing the citizens of Santee to vote on Fanita Ranch?
Thank you,
Marie Weber

I9

I9-1: The comment asks about the Second Recirculated Sections of the Final Revised Environmental Impact Report (EIR) for the Fanita Ranch Project (proposed project), how the second recirculation satisfies the judge's previous ruling, and Santee citizens voting on the proposed project.

As stated in Chapter 0, Preface, a lawsuit was filed challenging the adequacy of the Final Recirculated Sections of the Final Revised EIR. In September 2024, the San Diego County Superior Court issued a ruling identifying deficiencies in the Final Recirculated Sections related to Santee General Plan inconsistency. No other deficiencies in the Final Recirculated Sections were identified. The Second Recirculated Sections address the identified deficiencies by revising Section 4.10, Land Use and Planning.

Regarding Santee citizens voting on the proposed project, please refer to Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

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Comment Letter I10: JC, March 25, 2025

From: Sandi Sawa
To: Marni Borg
Subject: FW: 2nd Recirculated Sections of the Final EIR for Fanita Ranch
Date: Tuesday, March 25, 2025 2:15:29 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

From: J C
Sent: Tuesday, March 25, 2025 2:12 PM
To: Sandi Sawa
Subject: 2nd Recirculated Sections of the Final EIR for Fanita Ranch

Caution: The sender name (J C) is different from their email address (dacherry04@gmail.com), which may indicate an impersonation attempt. Verify the email's authenticity with the sender using your organization's trusted contact list before replying or taking further action.

Secured by Check Point

I10-1 This is absolutely ridiculous! The people of Santee have spoken and spoken about the Fanita Ranch project, yet the city council cares so little about their constituents.
This has been shot down on so many levels, yet you continue to discredit what we have voted for. It's an abomination and will not stand. We do NOT want this hazardous thing built.

I10

I10-1: The comment states Santee citizens do not want the Fanita Ranch Project (proposed project) built.

Please refer to Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I11: Kristy Hobbs, March 26, 2025

I11

From: Sandi Sawa
To: Marni Borg
Subject: Fw: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, March 27, 2025 7:14:22 AM

From: Kristy Hobbs
Sent: Wednesday, March 26, 2025 9:11:57 PM
To: Sandi Sawa
Cc: Rob McNelis ; Ronn Hall ; Laura Koval ; John Minto ; Dustin Trotter
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and Santee City Council,

I have lived in Santee for twenty-two years and in those twenty-two years, I have never met another Santee resident who was in favor of the Fanita Ranch project, not a single one. Take away the fact that our infrastructure simply can't support that population influx (and touting an additional lane on the 52 as some catchall solution to this issue is so absurd it borders on insulting), most people including myself vehemently oppose this development for the sole reason of safety. How many wildfires do we have to live through before human life is put above profit? How many environmental impact reports need to be issued by qualified individuals until this council puts their constituent's safety above a developer's dollars?

I11-1 Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Please don't forget you are elected officials and it is your duty to listen to your constituents regardless of your own personal agenda.

Respectfully,
Kristy Hobbs

I11-1: This comment expresses concern regarding traffic, population, wildfire, and placing senior housing in a fire hazard severity zone related to the Fanita Ranch Project (proposed project). This comment also addresses the voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, Thematic Response 2, Wildfire Risk, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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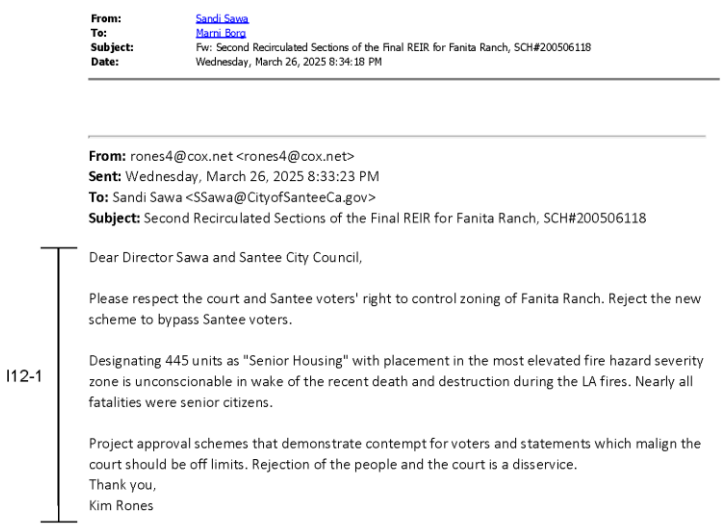
Comment Letter I12: Kim Rones, March 26, 2025

I12



From: Sandi Sawa
To: Marni Borg
Subject: Fw: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Wednesday, March 26, 2025 8:34:18 PM

From: rones4@cox.net <rones4@cox.net>
Sent: Wednesday, March 26, 2025 8:33:23 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

I12-1

Dear Director Sawa and Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. Rejection of the people and the court is a disservice.
Thank you,
Kim Rones

I12-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone and requests acknowledgement of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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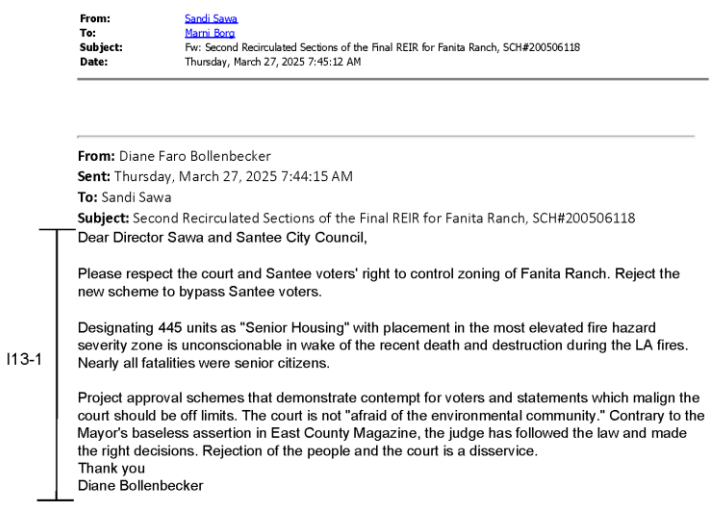
Comment Letter I13: Diane Bollenbecker, March 27, 2025

I13



From: Sandi Sawa
To: Marni Borg
Subject: Fw: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, March 27, 2025 7:45:12 AM

From: Diane Faro Bollenbecker
Sent: Thursday, March 27, 2025 7:44:15 AM
To: Sandi Sawa
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

I13-1

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you
Diane Bollenbecker

I13-1: The comment requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch. It also states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I14: Stephen Houlahan (1), March 27, 2025

I14

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, March 27, 2025 8:16:37 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

I am off every other Friday. My next Friday off is 3/28/2025.

From: Stephen Houlahan
Sent: Thursday, March 27, 2025 8:01 AM
To: Sandi Sawa ; Rowena Parravano
Cc: Dustin Trotter
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

I14-1

Director Sawa and Santee City Council,

As a former Santee City Council Member; former Vice Mayor of Santee; and lifelong resident of the City of Santee, I understand the danger of building in the wildfire prone area north of Santee. The risk of wildfire is so great in Santee that most home-owners insurance increased by 20%, many Santee residents had their homeowner's insurance cancelled outright.
What will the effect on current residents' homeowner's insurance be when thousands of homes are built in this fire zone? How will the potential homeowners within this development insure their homes?
Building in this very high wildfire risk zone is reckless and dangerous. The idea of designating 445 units as "Senior Housing" is downright MURDER by the developer, the Santee City Council, and City of Santee.
The 2025 Palisades Fire and Eaton Fire are only the most recent example of how dangerous wildfire is in Southern California with 29 known casualties, most of whom were elderly and unable to evacuate.
This latest scheme concocted by the developer, Mayor of Santee, and Santee City Council demonstrates their contempt for voters and the court.
In 2019 the citizens of the City of Santee codified the "General Plan Protection Initiative" into law by majority vote and enshrined their will over that of outside developers and corrupted politicians.
The statement by the Mayor of Santee in East County Magazine that court is "afraid of the environmental community" reveals his true intention to circumvent the law and the will of the people of Santee.
It is my well-informed opinion that the judge has followed the law and made the correct decisions.

Given the overwhelming evidence, I compel you to respect the court and Santee voters' right to control zoning of Fanita Ranch by rejecting this unlawful proposal.
With all due respect,
Hon. Stephen William Houlahan RN, MSN, MBA
Former Vice Mayor of the City of Santee 2019
Former Santee City Council Member 2016-2020

I14-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone, provides examples of recent fires, and discusses homeowners insurance. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I15: Stephen Houlahan (2), March 27, 2025

I15

From: "Rowena Parravano"
Sent: 03/27/2025 8:22:24 AM (-07:00)
To: "Jamie Bryan" <JBryan@CityofSanteeCa.gov>
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

FYI.

Rowena Parravano
Administrative Secretary
Engineering Department
Planning & Building Department
(619) 258-4100 x 167
rparravano@cityofsanteeca.gov

City of Santee
10601 Magnolia Ave.
Santee, CA 92071
CityofSanteeCA.gov

From: Stephen Houlahan
Sent: Thursday, March 27, 2025 8:01 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>; Rowena Parravano <RParravano@CityofSanteeCa.gov>
Cc: Dustin Trotter <DTrotter@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Director Sawa and Santee City Council,

As a former Santee City Council Member; former Vice Mayor of Santee; and lifelong resident of the City of Santee, I understand the danger of building in the wildfire prone area north of Santee.
The risk of wildfire is so great in Santee that most home-owners insurance increased by 20%, many Santee residents had their homeowner's insurance cancelled outright.

What will the effect on current residents' homeowner's insurance be when thousands of homes are built in this fire zone? How will the potential homeowners within this development insure their homes?

I15-1 Building in this very high wildfire risk zone is reckless and dangerous. The idea of designating 445 units as "Senior Housing" is downright MURDER by the developer, the Santee City Council, and City of Santee.
The 2025 Palisades Fire and Eaton Fire are only the most recent example of how dangerous wildfire is in Southern California with 29 known casualties, most of whom were elderly and unable to evacuate.

This latest scheme concocted by the developer, Mayor of Santee, and Santee City Council demonstrates their contempt for voters and the court.

In 2019 the citizens of the City of Santee codified the "General Plan Protection Initiative" into law by majority vote and enshrined their will over that of outside developers and corrupted politicians.

The statement by the Mayor of Santee in East County Magazine that court is "afraid of the environmental community" reveals his true intention to circumvent the law and the will of the people of Santee.

It is my well-informed opinion that the judge has followed the law and made the correct decisions.

Given the overwhelming evidence, I compel you to respect the court and Santee voters' right to control zoning of Fanita Ranch by rejecting this unlawful proposal.

I15-1: The comment reiterates Comment Letter I14.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I15-1 cont.

With all due respect,

Hon. Stephen William Houlahan RN, MSN, MBA
Former Vice Mayor of the City of Santee 2019
Former Santee City Council Member 2016-2020

Comment Letter I16: Christine and Andy Leidhoff, March 27, 2025

I16

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second RecirculatedSections of the Final Reir for Fanita Ranch SCH#200506118
Date: Thursday, March 27, 2025 10:14:13 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

I am off every other Friday. My next Friday off is 3/28/2025.

From: Christine Leidhoff
Sent: Thursday, March 27, 2025 10:13 AM
To: Sandi Sawa
Cc: Rob McNelis ; Ronn Hall ; Laura Koval ; Dustin Trotter
Subject: Second RecirculatedSections of the Final Reir for Fanita Ranch SCH#200506118

Dear Director Sawa and Santee City Council

I16-1 Once again as a citizen of this city I am imploring to respect the court's decision and voters' rights from further development of Fanita Ranch. It is absurd the city would agree to build this project in such a **dangerous fire zone**. To add, building senior homes where elderly folks would have even a more difficult time mobilizing should the fire emergency warrant evacuation is horrifying. Look at the L A fires! There are already too few evacuation routes and we can clearly imagine the tragic loss of life in this highly plausible situation.

Clearly Mayor Minto is disrespecting the ruling of the judge who has followed the law on environmental issues. I ask myself, why this continual battle for this project? Why would the Mayor speak against a judge's ruling as he did in East County Magazine?

My husband and I would be adversely affected as this plan deem our property PRESERVE LANDS. This designation lowers our building to 25%. You have done this to mitigate wild lands so that you can grant the Fanita Project more building lands. I believe 37% or more. This is grossly corrupt.

We ask that you once and for all cease this ridiculous, dangerous, and corrupt project.

Christine and Andy Leidhoff
11177 Summit Ave
Santee CA 92071

I16-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in a dangerous fire zone. It also discusses voters' rights and preserving wild lands in Santee.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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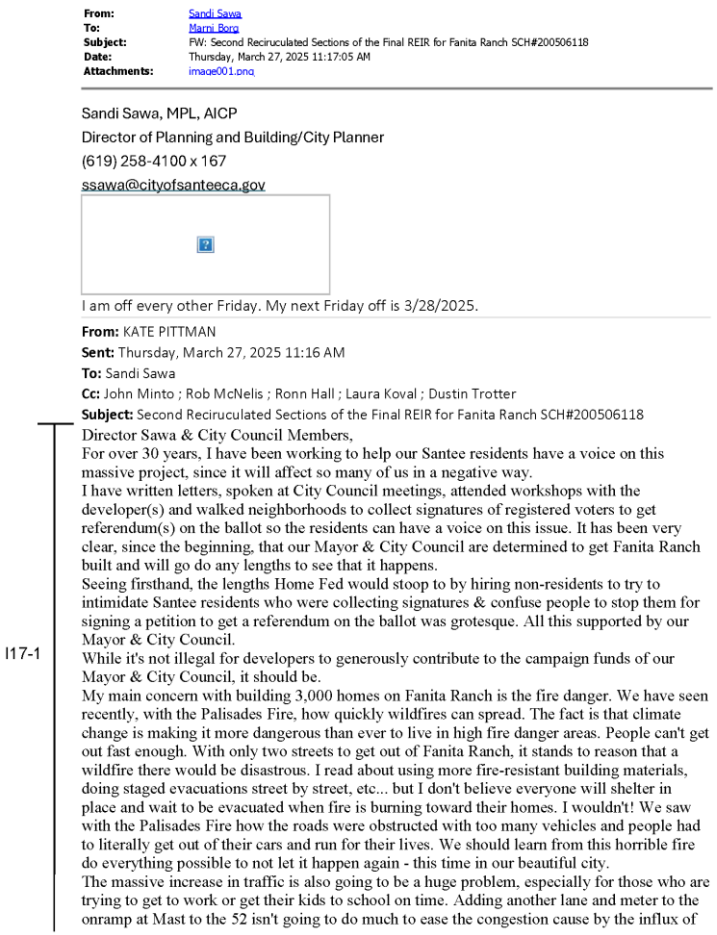
Comment Letter I17: Katherine Pittman, March 27, 2025

I17



From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch SCH#200506118
Date: Thursday, March 27, 2025 11:17:05 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

I am off every other Friday. My next Friday off is 3/28/2025.

From: KATE PITTMAN
Sent: Thursday, March 27, 2025 11:16 AM
To: Sandi Sawa
Cc: John Minto ; Rob McNelis ; Ronn Hall ; Laura Koval ; Dustin Trotter
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch SCH#200506118

Director Sawa & City Council Members,

For over 30 years, I have been working to help our Santee residents have a voice on this massive project, since it will affect so many of us in a negative way.

I have written letters, spoken at City Council meetings, attended workshops with the developer(s) and walked neighborhoods to collect signatures of registered voters to get referendum(s) on the ballot so the residents can have a voice on this issue. It has been very clear, since the beginning, that our Mayor & City Council are determined to get Fanita Ranch built and will go do any lengths to see that it happens.

Seeing firsthand, the lengths Home Fed would stoop to by hiring non-residents to try to intimidate Santee residents who were collecting signatures & confuse people to stop them for signing a petition to get a referendum on the ballot was grotesque. All this supported by our Mayor & City Council.

I17-1 While it's not illegal for developers to generously contribute to the campaign funds of our Mayor & City Council, it should be.

My main concern with building 3,000 homes on Fanita Ranch is the fire danger. We have seen recently, with the Palisades Fire, how quickly wildfires can spread. The fact is that climate change is making it more dangerous than ever to live in high fire danger areas. People can't get out fast enough. With only two streets to get out of Fanita Ranch, it stands to reason that a wildfire there would be disastrous. I read about using more fire-resistant building materials, doing staged evacuations street by street, etc... but I don't believe everyone will shelter in place and wait to be evacuated when fire is burning toward their homes. I wouldn't! We saw with the Palisades Fire how the roads were obstructed with too many vehicles and people had to literally get out of their cars and run for their lives. We should learn from this horrible fire do everything possible to not let it happen again - this time in our beautiful city.

The massive increase in traffic is also going to be a huge problem, especially for those who are trying to get to work or get their kids to school on time. Adding another lane and meter to the onramp at Mast to the 52 isn't going to do much to ease the congestion cause by the influx of

I17-1: This comment discusses the applicant, wildfire, climate change, and existing and future traffic related to the Fanita Ranch Project (proposed project). The comment also addresses voting against the proposed project.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I17-1 cont.

commuters coming from Fanita Ranch. We've seen what happens when Mast & Carlton Oaks gets backed up in the morning, where people speed through neighborhood side streets to beat the traffic. It's dangerous. With the new homes being built on the golf course and other projects going up around town, the traffic impacts are already compounding daily. Adding Fanita Ranch's 3000 homes would just destroy our city. People are not using mass transit and although some do work from home, most do not.

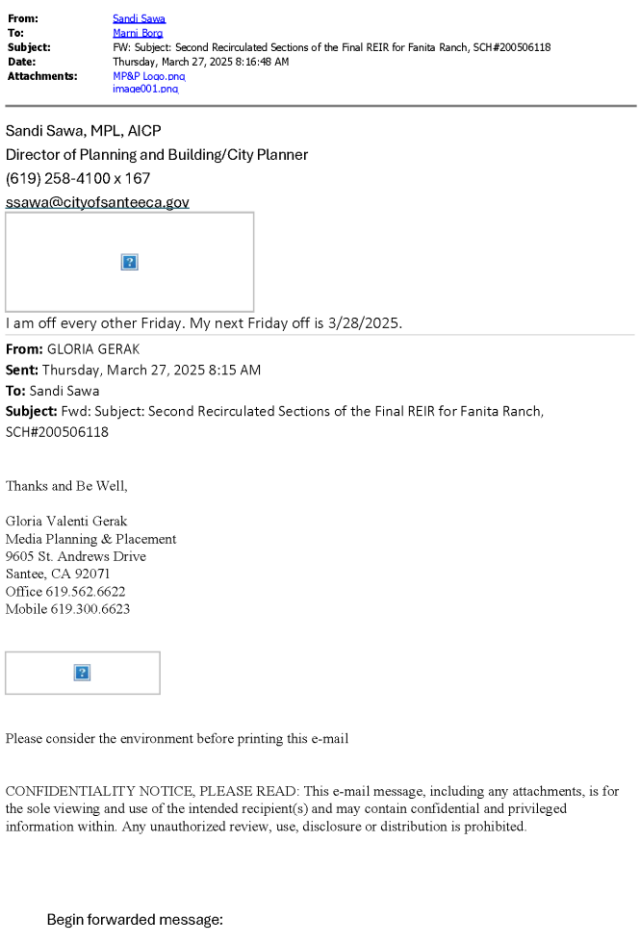
While the need for more housing is a reality, we all know that this will not be "affordable" housing for most. Fanita Ranch is not what the residents of Santee want and it's sad that no matter how hard we try to convey this, we are not listened to. In my experience when talking with residents for the last 30+ years about Fanita Ranch, the people who are most in favor of this project are business owners or in a business that will achieve monetary gain like real estate brokers and agents. The city will get a huge influx of money of course, but at what cost? Please reject this proposal.

Sincerely,

Kathrine J. Pittman

Comment Letter I18: Gloria Valenti Gerak, March 27, 2025

I18



From: Sandi Sawa
To: Marni Borg
Subject: FW: Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, March 27, 2025 8:16:48 AM
Attachments: MP&P Logo.png
image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

I am off every other Friday. My next Friday off is 3/28/2025.

From: GLORIA GERAK
Sent: Thursday, March 27, 2025 8:15 AM
To: Sandi Sawa
Subject: Fwd: Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Thanks and Be Well,

Gloria Valenti Gerak
Media Planning & Placement
9605 St. Andrews Drive
Santee, CA 92071
Office 619.562.6622
Mobile 619.300.6623

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Begin forwarded message:

I18-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone and congestion related to evacuation. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

From: GLORIA GERAK <gvgerak@aol.com>
Subject: Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: March 27, 2025 at 8:04:48 AM PDT
To: ssawa@cityofsantee.gov, "jminto@ci.santee.ca.us" <jminto@ci.santee.ca.us>, jminto@cityofsanteeca.gov
Cc: "jminto@ci.sante" <jminto@ci.sante>, WStratton@cityofsanteeca.gov, dtrotter@cityofsanteeca.gov, rmenelis@cityofsanteeca.gov, ronnhall@cityofsanteeca.gov, lkoval@cityofsanteeca.gov

I18-1

Dear Director Sawa and Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch and reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens. Not only does this place them in danger, but it places the entire community in danger as Mast Blvd. will become clogged with cars making it impossible for residents to leave safely and quickly.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The people HAVE SPOKEN MANY TIMES in voting this controversial project down over and over again. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.
Thank you

Thanks and Be Well,

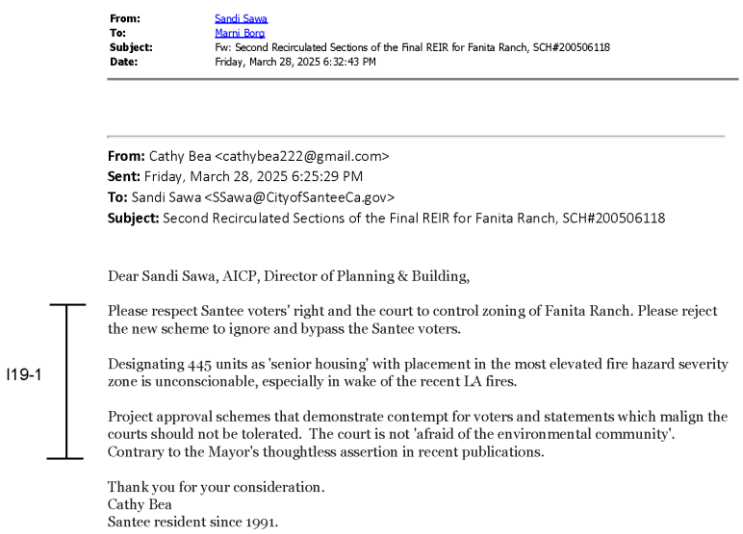
Gloria Valenti Gerak
Media Planning & Placement
9605 St. Andrews Drive
Santee, CA 92071
Office 619.562.6622
Mobile 619.300.6623

Please consider the environment before printing this e-mail

CONFIDENTIALITY NOTICE, PLEASE READ: This e-mail message, including any attachments, is for the sole viewing and use of the intended recipient(s) and may contain confidential and privileged information within. Any unauthorized review, use, disclosure or distribution is prohibited.

Comment Letter I19: Cathy Bea, March 28, 2025

I19



From: Sandi Sawa
To: Marni Borg
Subject: Fw: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Friday, March 28, 2025 6:32:43 PM

From: Cathy Bea <cathybea222@gmail.com>
Sent: Friday, March 28, 2025 6:25:29 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Sandi Sawa, AICP, Director of Planning & Building,

I19-1

Please respect Santee voters' right and the court to control zoning of Fanita Ranch. Please reject the new scheme to ignore and bypass the Santee voters.

Designating 445 units as 'senior housing' with placement in the most elevated fire hazard severity zone is unconscionable, especially in wake of the recent LA fires.

Project approval schemes that demonstrate contempt for voters and statements which malign the courts should not be tolerated. The court is not 'afraid of the environmental community'. Contrary to the Mayor's thoughtless assertion in recent publications.

Thank you for your consideration.
Cathy Bea
Santee resident since 1991.

I19-1: The comment requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch. It also states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I20: L Esry, March 28, 2025

I20

I20-1

From: Sandi Sawa
To: Stacy Bass
Subject: Re: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#2005061118
Date: Friday, March 28, 2025 5:20:47 AM

From: L Esry
Sent: Friday, March 28, 2025 4:56:15 AM
To: Sandi Sawa
Cc: Clerk
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#2005061118

Dear Director Sawa and Santee CityCouncil,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 443 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Head/eyfull fatalities were senior citizens.

Project approval on because that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's business assertion in East County Magazine, the judge has followed the law and made the right decision. Rejection of the people and the court is a disservice.

Thank you

I20-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgement of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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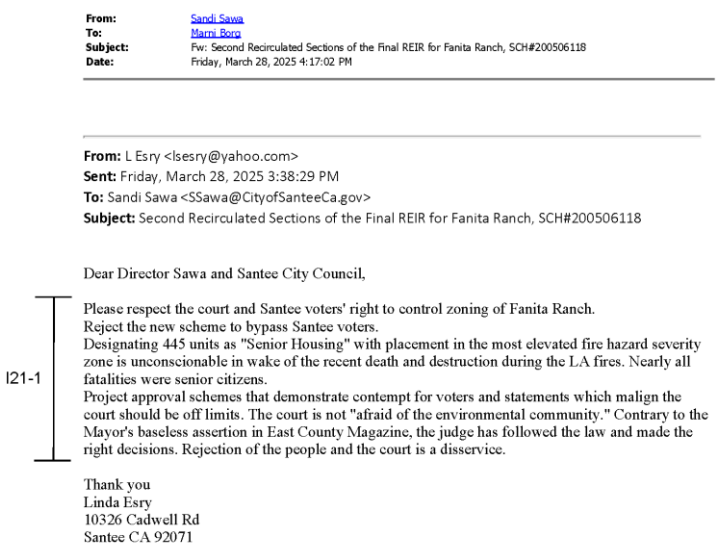
Comment Letter I21: Linda Esry, March 28, 2025

I21



From: Sandi Sawa
To: Marni Borg
Subject: Fw: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Friday, March 28, 2025 4:17:02 PM

From: L Esry <lsesry@yahoo.com>
Sent: Friday, March 28, 2025 3:38:29 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and Santee City Council,

I21-1

Please respect the court and Santee voters' right to control zoning of Fanita Ranch.
Reject the new scheme to bypass Santee voters.
Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.
Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you
Linda Esry
10326 Cadwell Rd
Santee CA 92071

I21-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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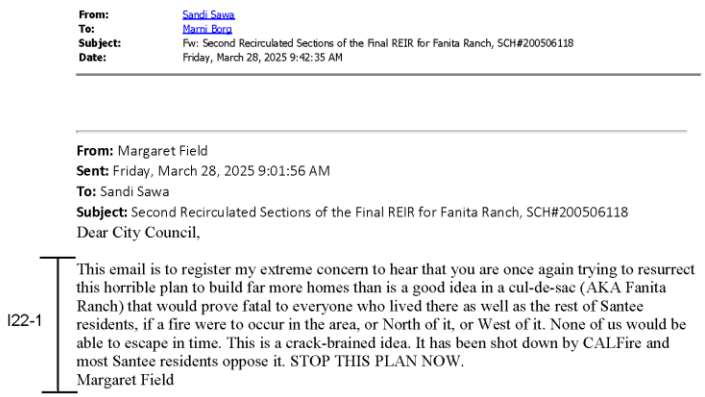
Comment Letter I22: Margaret Field, March 28, 2025

I22



From: Sandi Sawa
To: Marni Borg
Subject: Fw: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Friday, March 28, 2025 9:42:35 AM

From: Margaret Field
Sent: Friday, March 28, 2025 9:01:56 AM
To: Sandi Sawa
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear City Council,

I22-1 This email is to register my extreme concern to hear that you are once again trying to resurrect this horrible plan to build far more homes than is a good idea in a cul-de-sac (AKA Fanita Ranch) that would prove fatal to everyone who lived there as well as the rest of Santee residents, if a fire were to occur in the area, or North of it, or West of it. None of us would be able to escape in time. This is a crack-brained idea. It has been shot down by CALFire and most Santee residents oppose it. STOP THIS PLAN NOW.

Margaret Field

I22-1: This comment expresses general opposition to the Fanita Ranch Project (proposed project) and fire concerns. Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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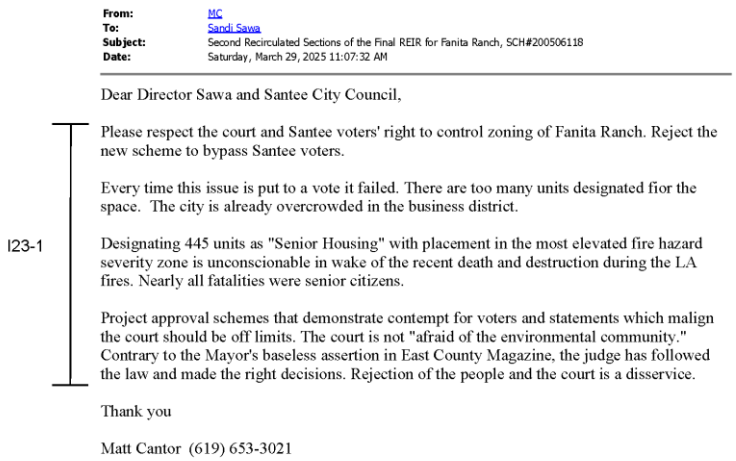
Comment Letter I23: Matt Cantor, March 29, 2025

I23



From: MC
To: Sandi Sawa
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Saturday, March 29, 2025 11:07:32 AM

Dear Director Sawa and Santee City Council,

I23-1

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Every time this issue is put to a vote it failed. There are too many units designated fior the space. The city is already overcrowded in the business district.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you

Matt Cantor (619) 653-3021

I23-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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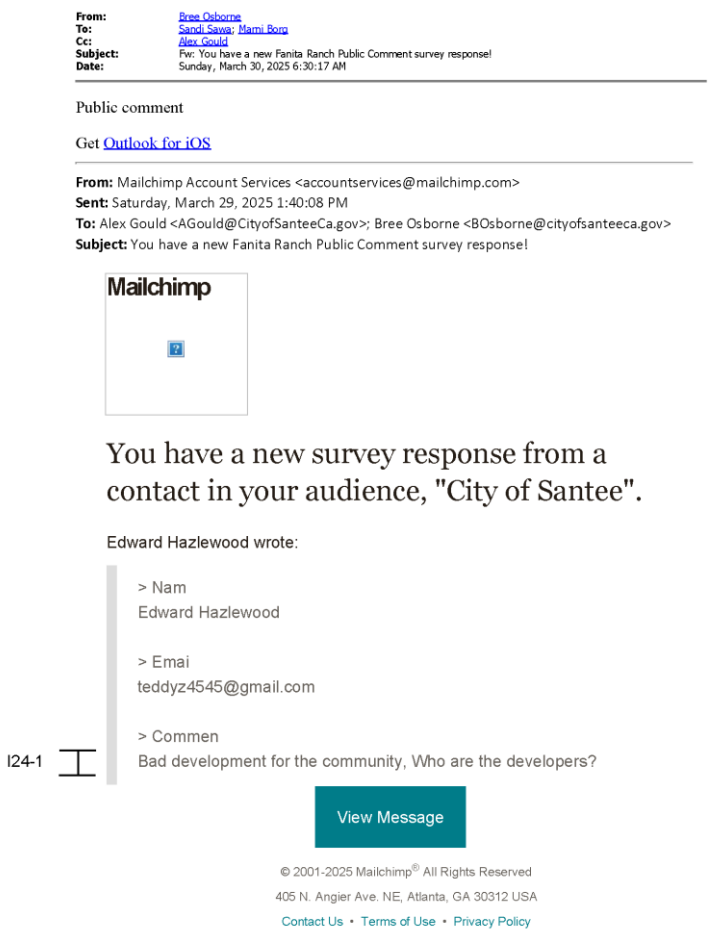
Comment Letter I24: Edward Hazlewood, March 29, 2025

I24



From: Bree Osborne
To: Sandi Sawa; Marni Borg
Cc: Alex Gould
Subject: Fw: You have a new Fanita Ranch Public Comment survey response!
Date: Sunday, March 30, 2025 6:30:17 AM

Public comment

Get Outlook for iOS

From: Mailchimp Account Services <accountservices@mailchimp.com>
Sent: Saturday, March 29, 2025 1:40:08 PM
To: Alex Gould <AGould@CityofSanteeCa.gov>; Bree Osborne <BOsborne@cityofsanteeca.gov>
Subject: You have a new Fanita Ranch Public Comment survey response!

Mailchimp

You have a new survey response from a contact in your audience, "City of Santee".

Edward Hazlewood wrote:

> Nam
Edward Hazlewood

> Emai
teddyz4545@gmail.com

I24-1 > Commen
Bad development for the community, Who are the developers?

View Message

© 2001-2025 Mailchimp® All Rights Reserved
405 N. Angier Ave. NE, Atlanta, GA 30312 USA
Contact Us • Terms of Use • Privacy Policy

I24-1: This comment expresses general opposition to the Fanita Ranch Project (proposed project). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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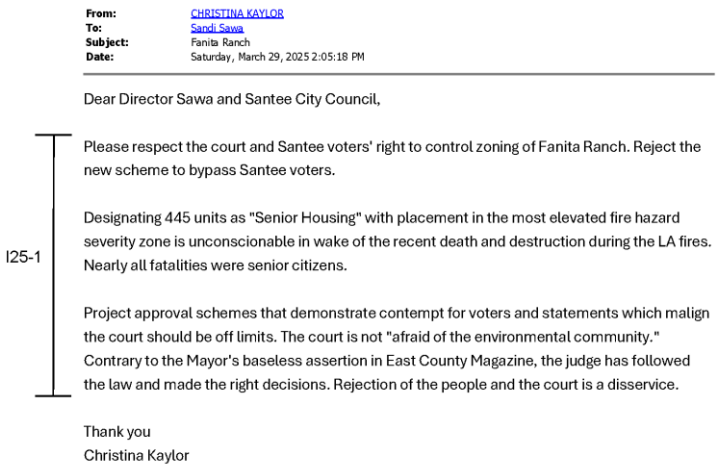
Comment Letter I25: Christina Kaylor, March 29, 2025

I25



From: CHRISTINA KAYLOR
To: Sandi Sawa
Subject: Fanita Ranch
Date: Saturday, March 29, 2025 2:05:18 PM

Dear Director Sawa and Santee City Council,

I25-1

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you
Christina Kaylor

I25-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I26: Mike Leathers, March 29, 2025

I26

From: Mike Leathers
To: Sandi Sawa
Subject: Fanita Ranch
Date: Saturday, March 29, 2025 2:07:56 PM

I26-1 As a resident of Santee since 1964 I have to wonder how many times the citizens of Santee have to say NO to Fanita Ranch. This City Counsel was elected for the people yet our wishes go unheard. Home Federal will and has done all it could to influence this City Counsel with funds thru Political Action Committees to influence a decision. City of Santee listen to the people and do not bypass their wishes. The traffic is horrible, the electric grid is weak at best and to place homes in a box canyon is insane. Listen to the people that elected you.

Mike Leathers

I26-1: This comment requests acknowledgement of the citizens of Santee. It also discusses existing traffic and the electrical grid.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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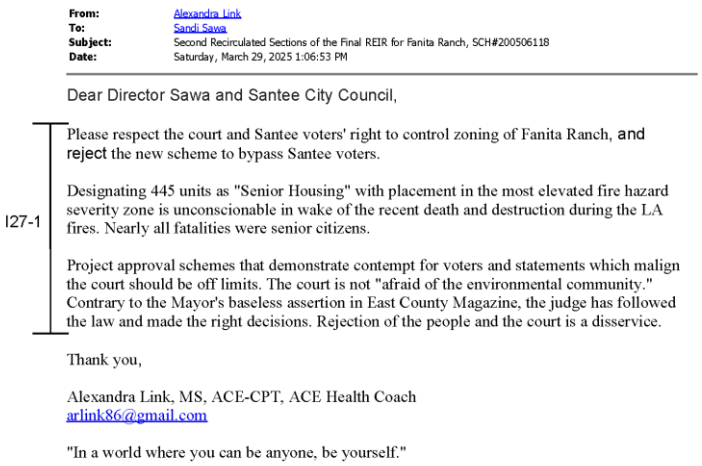
Comment Letter I27: Alexandra Link, March 29, 2025

I27



From: Alexandra Link
To: Sandi Sawa
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Saturday, March 29, 2025 1:06:53 PM

Dear Director Sawa and Santee City Council,

I27-1

Please respect the court and Santee voters' right to control zoning of Fanita Ranch, and reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you,

Alexandra Link, MS, ACE-CPT, ACE Health Coach
arlink86@gmail.com

"In a world where you can be anyone, be yourself."

I27-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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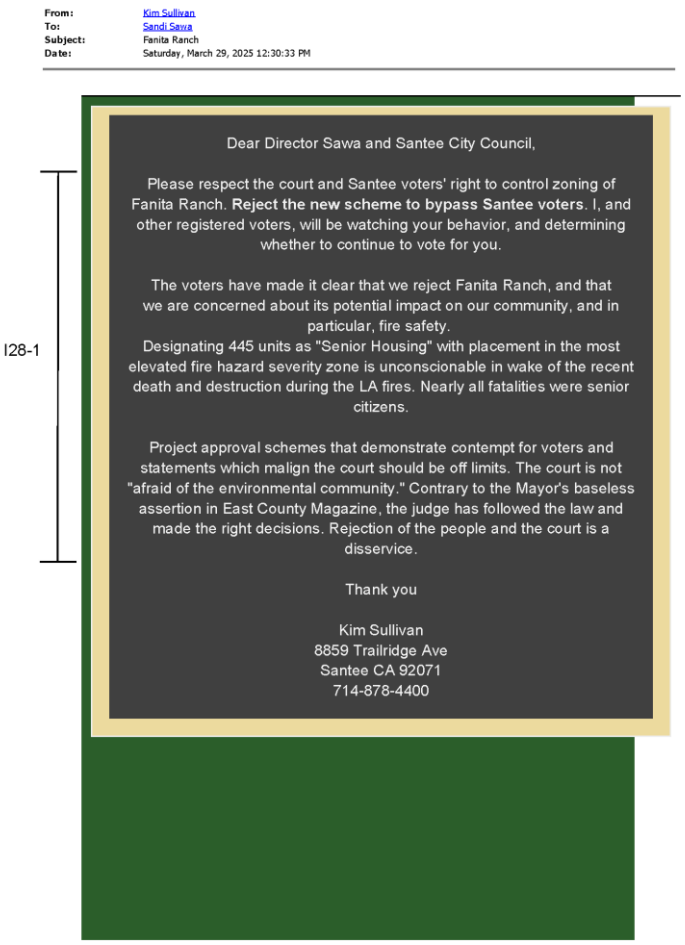
Comment Letter I28: Kim Sullivan, March 29, 2025

I28



From: Kim Sullivan
To: Sandi Sawa
Subject: Fanita Ranch
Date: Saturday, March 29, 2025 12:30:33 PM

Dear Director Sawa and Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. **Reject the new scheme to bypass Santee voters**. I, and other registered voters, will be watching your behavior, and determining whether to continue to vote for you.

The voters have made it clear that we reject Fanita Ranch, and that we are concerned about its potential impact on our community, and in particular, fire safety.
Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you

Kim Sullivan
8859 Trailridge Ave
Santee CA 92071
714-878-4400

I28-1

I28-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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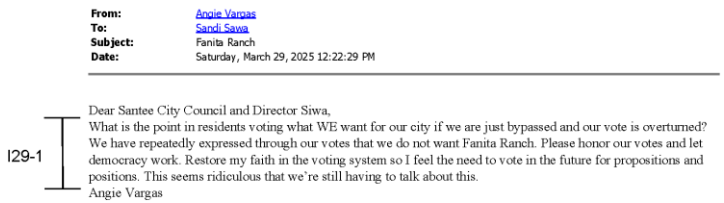
Comment Letter I29: Angie Vargas, March 29, 2025

I29



From: Angie Vargas
To: Sandi Sawa
Subject: Fanita Ranch
Date: Saturday, March 29, 2025 12:22:29 PM

I29-1

Dear Santee City Council and Director Siwa,
What is the point in residents voting what WE want for our city if we are just bypassed and our vote is overturned? We have repeatedly expressed through our votes that we do not want Fanita Ranch. Please honor our votes and let democracy work. Restore my faith in the voting system so I feel the need to vote in the future for propositions and positions. This seems ridiculous that we're still having to talk about this.
Angie Vargas

I29-1: This comment requests acknowledgment of Santee voters.

Please refer to Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

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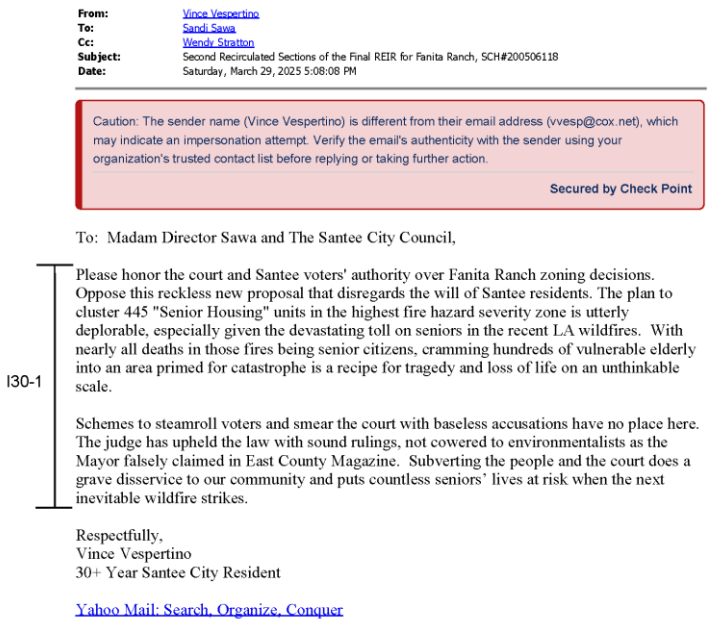
Comment Letter I30: Vince Vespertino, March 29, 2025

I30



From: Vince Vespertino
To: Sandi Sawa
Cc: Wendy Stratton
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Saturday, March 29, 2025 5:08:08 PM

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

Secured by Check Point

To: Madam Director Sawa and The Santee City Council,

I30-1 Please honor the court and Santee voters' authority over Fanita Ranch zoning decisions. Oppose this reckless new proposal that disregards the will of Santee residents. The plan to cluster 445 "Senior Housing" units in the highest fire hazard severity zone is utterly deplorable, especially given the devastating toll on seniors in the recent LA wildfires. With nearly all deaths in those fires being senior citizens, cramming hundreds of vulnerable elderly into an area primed for catastrophe is a recipe for tragedy and loss of life on an unthinkable scale.

Schemes to steamroll voters and smear the court with baseless accusations have no place here. The judge has upheld the law with sound rulings, not cowered to environmentalists as the Mayor falsely claimed in East County Magazine. Subverting the people and the court does a grave disservice to our community and puts countless seniors' lives at risk when the next inevitable wildfire strikes.

Respectfully,
Vince Vespertino
30+ Year Santee City Resident

Yahoo Mail: Search, Organize, Conquer

I30-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in the highest fire hazard severity zone. The comment also requests acknowledgment of the court decisions and voters' authority over the proposed project's zoning decisions.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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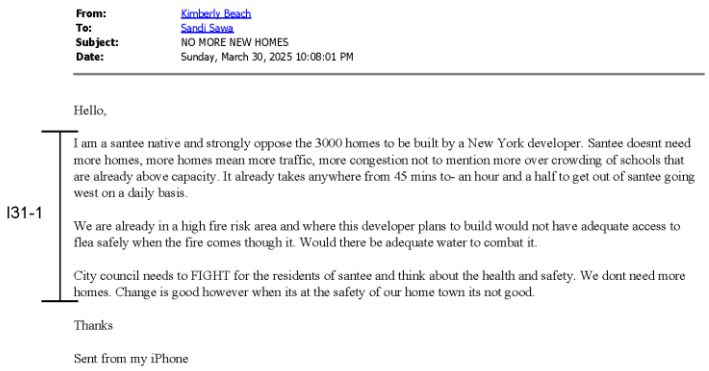
Comment Letter I31: Kimberly Beach, March 30, 2025

I31



From: Kimberly Beach
To: Sandi Sawa
Subject: NO MORE NEW HOMES
Date: Sunday, March 30, 2025 10:08:01 PM

Hello,

I31-1

I am a santee native and strongly oppose the 3000 homes to be built by a New York developer. Santee doesnt need more homes, more homes mean more traffic, more congestion not to mention more over crowding of schools that are already above capacity. It already takes anywhere from 45 mins to- an hour and a half to get out of santee going west on a daily basis.

We are already in a high fire risk area and where this developer plans to build would not have adequate access to flea safely when the fire comes though it. Would there be adequate water to combat it.

City council needs to FIGHT for the residents of santee and think about the health and safety. We dont need more homes. Change is good however when its at the safety of our home town its not good.

Thanks

Sent from my iPhone

I31-1: This comment states the Fanita Ranch Project (proposed project) would increase traffic, create overcrowding in schools, and would not have adequate access to evacuation routes in the case of a fire. This comment also questions water availability.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I32: Rachel Brown, March 30, 2025

I32

From: Rachel Brown
To: Sandi Sawa
Subject: Santee City Council
Date: Sunday, March 30, 2025 10:42:11 PM

Caution: The sender name (Rachel Brown) is different from their email address (wiggleworm2100@yahoo.com), which may indicate an impersonation attempt. Verify the email's authenticity with the sender using your organization's trusted contact list before replying or taking further action.

Secured by Check Point

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Council

REGARDING: New York developer's plans to build over 3000 homes just north of Santee

I32-1 This development will absolutely and severely impact the quality of life and roadways (not in a good way)... including our already horrible daily commutes for the residents of our community. More businesses are increasing the return to office for work so adding another 3000 homes (around 10,000 people) would only add to the stress and squeeze of the daily grind. Adding these homes will undoubtedly impact our classrooms which are already full. We do not have the capacity as a city to handle this influx of people and homes.

A concerned resident

Rachel brown
760 822 5522

Santee resident

I32-1: This comment states that implementation of the Fanita Ranch Project (proposed project) would affect quality of life, increase traffic, and impact local classrooms.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I33: Janice Chandler, March 30, 2025

I33

From: Janice
To: Sandi Sawa
Subject: More homes
Date: Sunday, March 30, 2025 9:56:23 PM

It is my understanding that another 3000 homes are planned to the north of Santee by some New York developers.

Please, no more homes. The roads are pretty much parking lots during rush hour & I can't even imagine what another 3000+ cars & people will do to our beautiful little city. It's nasty now trying to get from one end of town to the other, stores are packed, parking sucks. Way too many people & cars now.

I33-1

What about electricity? SDG&E keeps telling us to up the air conditioning so we won't have any brownouts, we can't wash cars or water lawns due to water conservation. How can the utilities support another 3000 homes? Unless they've been lying to us all along about conserving & there's actually a big surplus.

Between the extra traffic, the burden on our utilities, the stores being even more packed & no parking at all.....wow, does this sound like we really need another 3000 homes & all that comes with it?

Please preserve Santee & the way of life that you are slowly ruining.

Thank you

Janice Chandler

A hero is an ordinary individual who finds strength to persevere & endure in spite of overwhelming obstacles. C. Reeve

I33-1: This comment states that implementation of the Fanita Ranch Project (proposed project) would increase traffic and burden existing utilities.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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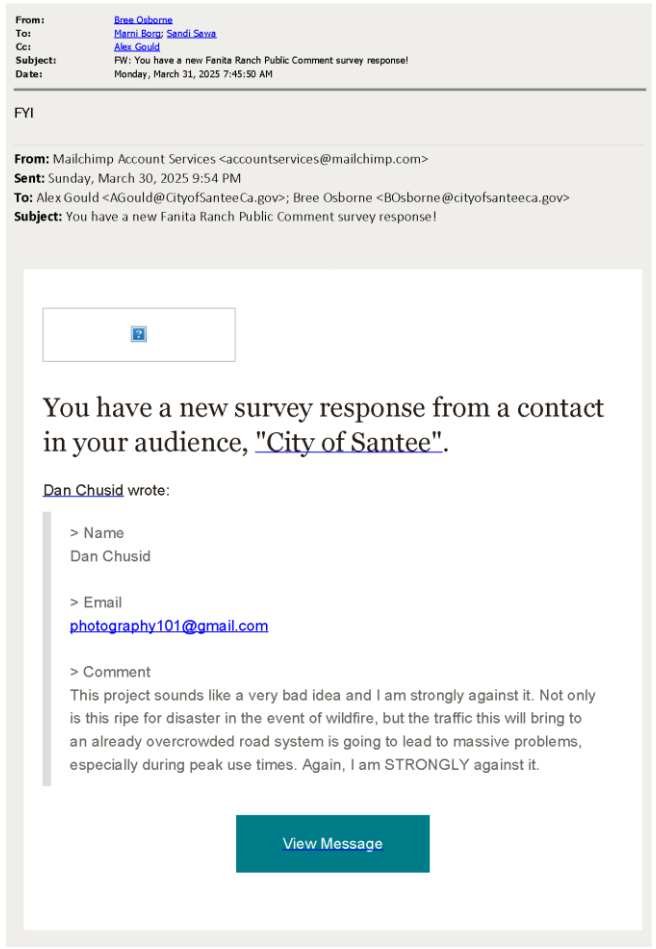
Comment Letter I34: Dan Chusid (1), March 30, 2025

I34



From: Bree Osborne
To: Marni Borg; Sandi Sawa
Cc: Alex Gould
Subject: FW: You have a new Fanita Ranch Public Comment survey response!
Date: Monday, March 31, 2025 7:45:50 AM

FYI

From: Mailchimp Account Services <accountservices@mailchimp.com>
Sent: Sunday, March 30, 2025 9:54 PM
To: Alex Gould <AGould@CityofSanteeCa.gov>; Bree Osborne <BOsborne@cityofsanteeca.gov>
Subject: You have a new Fanita Ranch Public Comment survey response!

You have a new survey response from a contact in your audience, "City of Santee".

Dan Chusid wrote:

> Name
Dan Chusid

> Email
photography101@gmail.com

> Comment
This project sounds like a very bad idea and I am strongly against it. Not only is this ripe for disaster in the event of wildfire, but the traffic this will bring to an already overcrowded road system is going to lead to massive problems, especially during peak use times. Again, I am STRONGLY against it.

View Message

I34-1

I34-1: This comment states that the Fanita Ranch Project (proposed project) would result in a disaster in the event of wildfire, as well as increased traffic.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I35: Dan Chusid (2), March 30, 2025

I35

From: Dan Chusid
To: Sandi Sawa
Subject: RE: Fanita Ranch Housing Project
Date: Sunday, March 30, 2025 10:34:28 PM

To whom it may concern,

I35-1

I want to express my outrage that this project would even be considered to be approved for Santee. We have lived here for nearly 20 years and see this as a very bad idea for the city we love.
It will increase traffic to an unbearable level (especially traffic heading for the 52) and lead to possible gridlock in the event of wildfire or other catastrophe. Having no egress north, west or east, and only going south, is a recipe for disaster.

We just endured three years of truck and machinery noise from the construction of the new water treatment plant and the digging up of the roads behind our house for pipe installation. Now we'd be looking at a constant stream of the same truck and heavy machinery traffic for years to come. That is TOTALLY UNACCEPTABLE.

I have seen the destruction from wildfires twice before, as I formerly lived in Scripps Ranch during the wildfires in 2003 and 2007. No matter how you build these homes, they have the potential to burn and cause injuries and death.

We have numerous other reasons to be against this giant invasive project, that I would be happy to list.

PLEASE DO NOT build this.

Sincerely,
Dan Chusid
Santee Resident

I35-1: This comment states that the Fanita Ranch Project (proposed project) would increase traffic, create construction noise, and result in potential impacts from wildfires.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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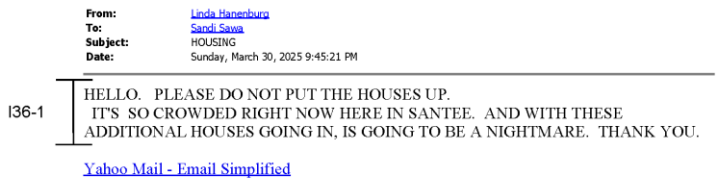
Comment Letter I36: Linda Hanenburg, March 30, 2025

I36



From: Linda Hanenburg
To: Sandi Sawa
Subject: HOUSING
Date: Sunday, March 30, 2025 9:45:21 PM

I36-1 HELLO. PLEASE DO NOT PUT THE HOUSES UP.
IT'S SO CROWDED RIGHT NOW HERE IN SANTEE. AND WITH THESE
ADDITIONAL HOUSES GOING IN, IS GOING TO BE A NIGHTMARE. THANK YOU.

Yahoo Mail - Email Simplified

I36-1: This comment expresses general opposition for the Fanita Ranch Project (proposed project) due to overcrowding.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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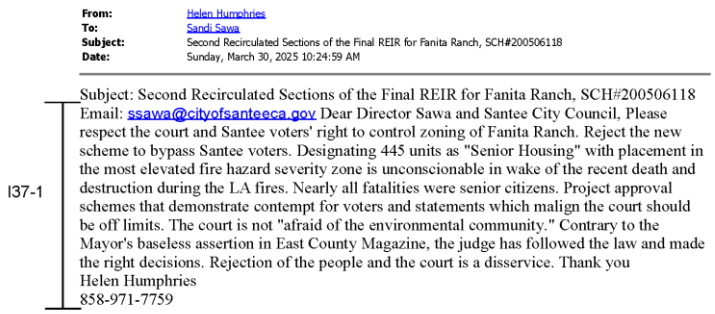
Comment Letter I37: Helen Humphries, March 30, 2025

I37



From: Helen Humphries
To: Sandi Sawa
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Sunday, March 30, 2025 10:24:59 AM

I37-1

Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Email: ssawa@cityofsanteeca.gov Dear Director Sawa and Santee City Council, Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters. Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens. Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice. Thank you
Helen Humphries
858-971-7759

I37-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone and requests acknowledgement of Santee voters' rights to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I38: Samantha Hurst, March 30, 2025

I38

From: Hurst, B S L
To: Sandi Sawa
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Sunday, March 30, 2025 8:19:08 AM

Dear Director Sawa and City Councilmembers,

I38-1 I'm a resident of Santee, and **for the past 5 years I've spoken out against the Fanita Ranch development.** And still—it's back. This time, the developers are disguising it as "Senior Housing," placing hundreds of older adults in our city's highest fire hazard zone. After everything we've seen from the recent L.A. fires—the tragic losses of seniors during recent wildfires—how can this even be considered?

Even more outrageous is the attempt to bypass Santee voters and paint the courts as biased. The court isn't "afraid" of anyone. It followed the law and made the right call! Suggesting otherwise insults both our intelligence and the integrity of the legal system.

We're not just talking about zoning. We're talking about **safety**, **lives**, **respect for the community**, and **the rule of law**.

Please reject this plan. Our city deserves leaders who put people first—not developers!

Sincerely,

Samantha Hurst, PhD, MA
Clinical Professor | Herbert Wertheim School of Public Health & Human Longevity Science
Member, Cancer Control Program, Moores Cancer Center
UC San Diego | Health Sciences
hwsph.ucsd.edu
O: 858.822-0766 | C: 619.818.0809 | E: shurst@health.ucsd.edu

-Resident of **Weston**

I38-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in a high fire hazard severity zone and bypass Santee voters.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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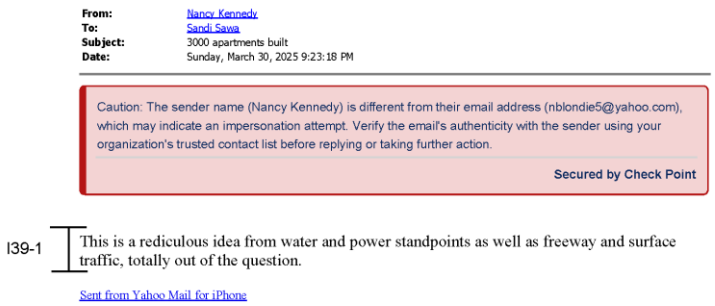
Comment Letter I39: Nancy Kennedy, March 30, 2025

I39



From: Nancy Kennedy
To: Sandi Sawa
Subject: 3000 apartments built
Date: Sunday, March 30, 2025 9:23:18 PM

Caution: The sender name (Nancy Kennedy) is different from their email address (nblondie5@yahoo.com), which may indicate an impersonation attempt. Verify the email's authenticity with the sender using your organization's trusted contact list before replying or taking further action.

Secured by Check Point

I39-1 This is a rediculous idea from water and power standpoints as well as freeway and surface traffic, totally out of the question.

Sent from Yahoo Mail for iPhone

I39-1: This comment expresses opposition to the Fanita Ranch Project (proposed project) due to water, power, and freeway and surface traffic.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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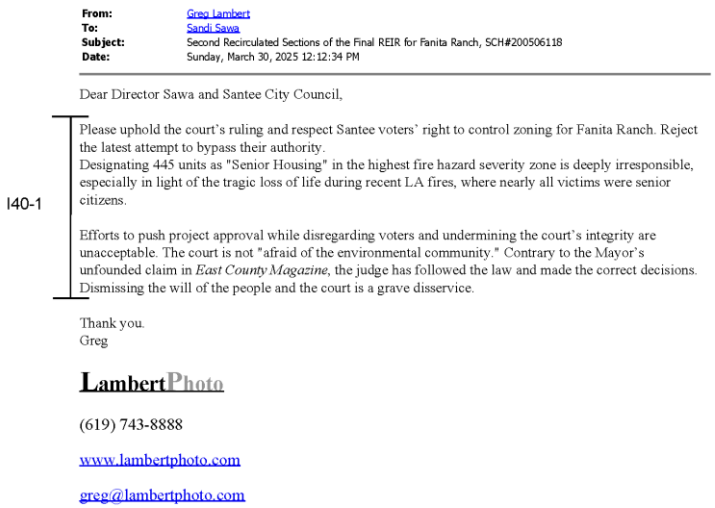
Comment Letter I40: Greg Lambert, March 30, 2025

I40



From: Greg Lambert
To: Sandi Sawa
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Sunday, March 30, 2025 12:12:34 PM

Dear Director Sawa and Santee City Council,

I40-1 Please uphold the court's ruling and respect Santee voters' right to control zoning for Fanita Ranch. Reject the latest attempt to bypass their authority.
Designating 445 units as "Senior Housing" in the highest fire hazard severity zone is deeply irresponsible, especially in light of the tragic loss of life during recent LA fires, where nearly all victims were senior citizens.

Efforts to push project approval while disregarding voters and undermining the court's integrity are unacceptable. The court is not "afraid of the environmental community." Contrary to the Mayor's unfounded claim in *East County Magazine*, the judge has followed the law and made the correct decisions. Dismissing the will of the people and the court is a grave disservice.

Thank you.
Greg

LambertPhoto

(619) 743-8888

www.lambertphoto.com

greg@lambertphoto.com

I40-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in the highest fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning for Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I41: Pamela Meyers, March 30, 2025

I41

From: pam meyers
To: Sandi Sawa
Subject: NO on Fanita Ranch
Date: Sunday, March 30, 2025 11:05:29 PM

I41-1 Hello - my name is Pamela Meyers and I am writing to ask that you support a NO vote specific to the Fanita Ranch housing project. While it is my understanding our right to vote has been ignored, a judge has already ruled against this project. Santee residents have overwhelmingly advised we do not support this project. Santee is overcrowded; I commute to North County twice a week and half of my hour long commute is getting out of Santee and up over 52. I graduated from Santana in 1978 and my husband and I bought our home in Santee in 1989 wanting safe neighborhoods and a quieter lifestyle in which to raise our family. Unfortunately, Santee no longer offers either. While I understand there is a housing shortage, Santee is at capacity. A yes vote would endanger the community during fire season, which is now year around. The citizens of Santee have spoken. No on irresponsible building, no on out of state developers, and no on Fanita Ranch.

Thank you for your time and consideration.

Pamela Meyers

I41-1: This comment discusses the existing traffic congestion in the City of Santee and right to vote. It also states that the Fanita Ranch Project (proposed project) would endanger the community during wildfire season.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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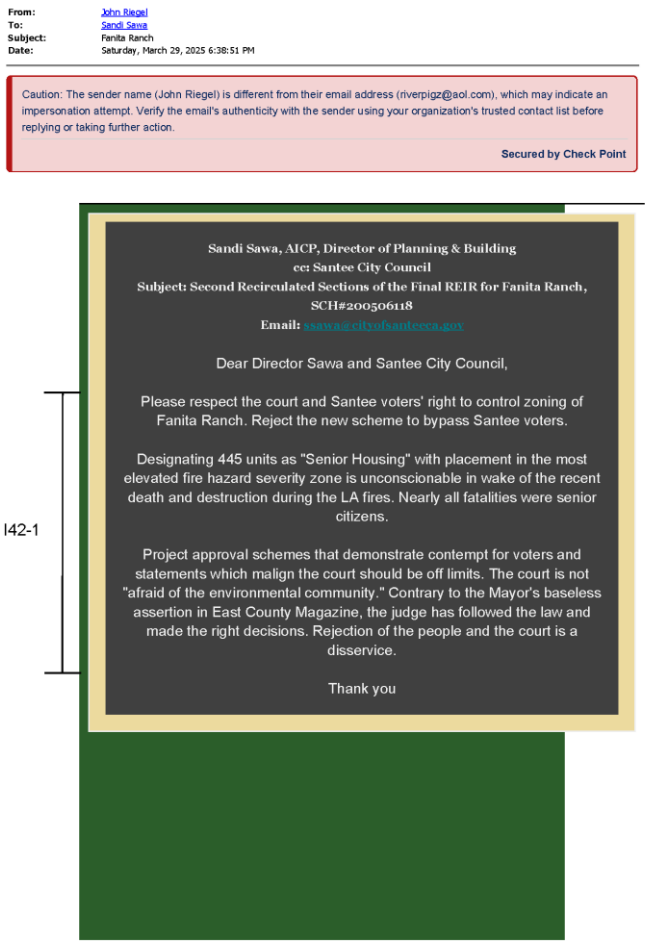
Comment Letter I42: John Riegel, March 30, 2025

I42



From: John Riegel
To: Sandi Sawa
Subject: Fanita Ranch
Date: Saturday, March 29, 2025 6:38:51 PM

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

Secured by Check Point

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Council
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Email: ssawa@cityofsanteeca.gov

Dear Director Sawa and Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you

I42-1

I42-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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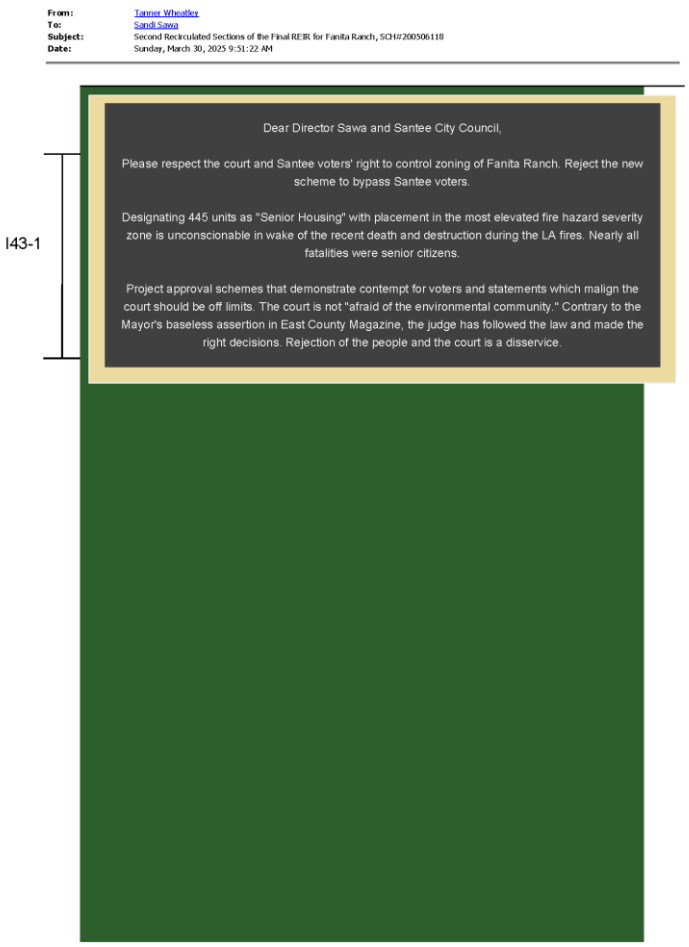
Comment Letter I43: Tanner Wheatley, March 30, 2025

I43



I43-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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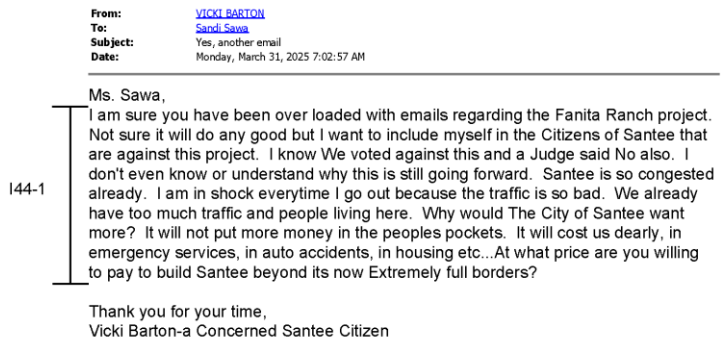
Comment Letter I44: Vicki Barton, March 31, 2025

I44



From: VICKI BARTON
To: Sandi Sawa
Subject: Yes, another email
Date: Monday, March 31, 2025 7:02:57 AM

Ms. Sawa,

I44-1 I am sure you have been over loaded with emails regarding the Fanita Ranch project. Not sure it will do any good but I want to include myself in the Citizens of Santee that are against this project. I know We voted against this and a Judge said No also. I don't even know or understand why this is still going forward. Santee is so congested already. I am in shock everytime I go out because the traffic is so bad. We already have too much traffic and people living here. Why would The City of Santee want more? It will not put more money in the peoples pockets. It will cost us dearly, in emergency services, in auto accidents, in housing etc...At what price are you willing to pay to build Santee beyond its now Extremely full borders?

Thank you for your time,
Vicki Barton-a Concerned Santee Citizen

I44-1: This comment discusses the existing traffic congestion in the City of Santee and expresses general opposition to the Fanita Ranch project (proposed project).

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

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Comment Letter I45: Mary Ann Bennett, March 31, 2025

I45

From: Sandi Sawa
To: Marni Borg
Subject: FW: Opposition to Fanita Ranch
Date: Wednesday, April 2, 2025 3:38:29 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Bennett <emailtobennett@gmail.com>
Sent: Monday, March 31, 2025 9:04 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Opposition to Fanita Ranch

I am submitting my opposition to the Fanita Ranch project for the following reasons:
* Increased traffic. City is already congested during certain times and days. Adding more trash trucks and Amazon vans would impact the peaceful neighborhoods in North Santee. There will also be more impact on our infrastructure.
* increased pollution from more vehicles in the city and noise pollution from more vehicles as well as construction noise and air pollution.
I45-1 * Increased strain on Fire and Law Enforcement. Hiring additional first responders will increase taxes.
* Loss of open space for wildlife and people. People need recreation and wildlife needs a place to live and survive.

I have lived in Santee for 41 years and have seen a lot of growth but I think it needs to stop to preserve our quality of life and keep Santee as a great city to live in.

Thank you for your time and consideration.

Mary Ann Bennett

I45-1: This comment states that implementation of the Fanita Ranch Project (proposed project) would result in increased traffic, pollution, and strain on fire and law enforcement. It also states that the proposed project would result in the loss of open space for wildlife and people and impact infrastructure.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I46: Peter and Deborah Calloway, March 31, 2025

I46

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch
Date: Monday, March 31, 2025 11:32:15 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: dway2 <dway2@cox.net>
Sent: Monday, March 31, 2025 11:28 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch

Dear [Recipient Name],

I am writing to express my serious concerns regarding the potential negative impacts of the Fanita Ranch project on our city's quality of life. As a resident for 29 years, I have witnessed firsthand the significant changes our community has undergone. While I understand the need for development, I believe the Fanita Ranch project, as currently planned, poses unacceptable challenges to our existing infrastructure and overall livability.

I46-1

My primary concern centers on the anticipated increase in traffic congestion. The current infrastructure is already strained, as evidenced by my daily experience of significant delays simply exiting my street onto Mast Avenue during peak hours. The limited number of arterial roads – four north-south and two east-west – are insufficient to handle a substantial increase in vehicle traffic. The resulting congestion could severely impact commute times for residents, negatively affecting their quality of life and potentially impacting emergency response times.

I urge you to carefully reconsider the project's current design and thoroughly assess its potential consequences on our city's traffic infrastructure and overall livability. I am confident that a collaborative effort can lead to a development plan that meets the community's needs

I46-1: This comment states that the Fanita Ranch Project (proposed project) would result in an increase in traffic congestion, impacts to emergency response times, and insufficient infrastructure.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

IX-1
cont.

while preserving the character and tranquility that make our city so desirable.

Sincerely,

Peter and Deborah Callaway

Sent from Yahoo Mail for iPhone

Comment Letter I47: Debra Clark, March 31, 2025

I47

From: Sandi Sawa
To: Marni Borg
Subject: FW: NO on Fanita Ranch
Date: Monday, March 31, 2025 4:44:05 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Debra Clark <barksclark@gmail.com>
Sent: Monday, March 31, 2025 4:40 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: NO on Fanita Ranch

To be brief, I will quickly itemize the reasons. They are not new.

1. Increased traffic and gridlock in town
2. Increased noise and pollution
3. Increased fire risk
4. Current response times for first responders will increase (I know that some minor changes are currently being made and there is another fire station planned BUT, when built out, the extended population will overwhelm those measures.
5. Developer fees will help in the short term but it is a one-time fix. Our budget is stretched now and road repairs are not keeping up with the problem.
6. Loss of nature and wildlife
7. Loss of scenic beauty and quality of life. (New residents may have nice views but most of us would rather look at the hills than houses.)
8. Increased commute times
9. Lack of routes out of Fanita Ranch in an emergency
10. Increased water usage, which we don't have!

I47-1

Thank you for your consideration.

I47-1: This comment states that the Fanita Ranch Project (proposed project) would result in increased traffic, noise, pollution, fire risk, response times, commute times, and water usage. It also states that the proposed project would result in the loss of nature and wildlife, scenic beauty, and quality of life and a lack of emergency escape routes.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I live at: 10006 Holborn Street in Santee
Phone: 619-548-2540

--
Debra Clark
barksclark@gmail.com

Comment Letter I48: Sara Deacon, March 31, 2025

I48

From: Sandi Sawa
To: Marni Borg
Subject: FW: NO TO FANITA RANCH
Date: Monday, March 31, 2025 1:58:59 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Sara Deacon <mrsdeacon09@gmail.com>
Sent: Monday, March 31, 2025 11:41 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: NO TO FANITA RANCH

Hello- these are my "people's comments" for the 4/10 city council meeting.

The Fanita Ranch build is not wanted and not needed. The residents have voted it down countless times and judges have ruled against it, but the city council continues to try and find ways around the votes of the people. This is unethical and the council is not abiding by thier commitment to work for the people.

I48-1

It's been proven that this build would be detrimental to surrounding protected wildlife, in addition to being built in a high fire zone which would cause additional danger to the community and all of its residents. Nothing that the Fanita Ranch community could "add" to the community would outweigh the negatives of the environmental impacts, fire dangers, road way congestion, additional strain on our already challenged electrical grids, etc. Stop trying to force this community upon us when the people have spoken, many times, and have said that we do not want this here. In the words of Mayor Minto:

I48-1: The comment requests acknowledgment of the previous Santee residents' votes and judges' rulings on the Fanita Ranch Project (proposed project). It also states that the proposed project would result in impacts to wildlife, fire dangers, roadway congestion, and additional strain on the electrical grid.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I48-1 cont.

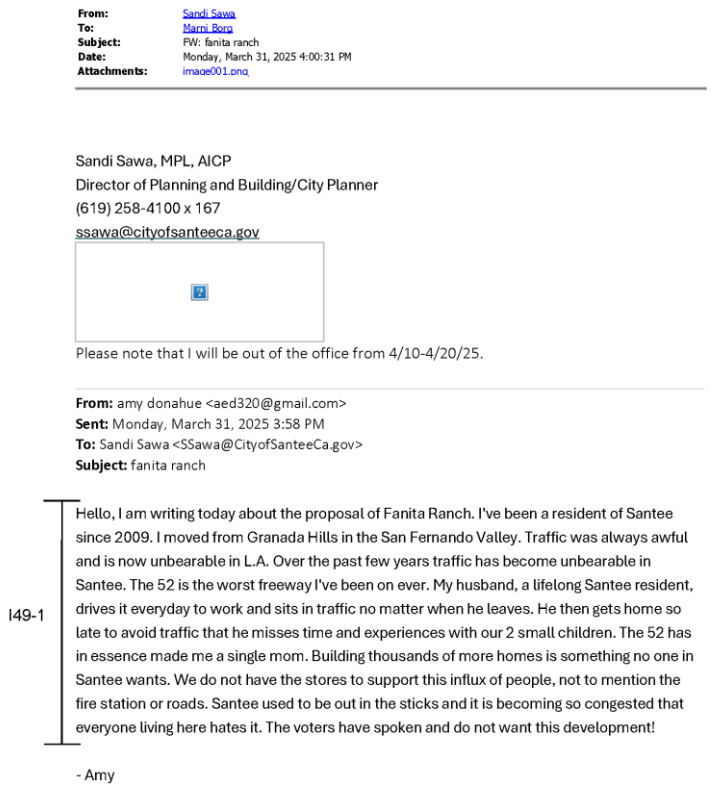
"Santee will continue to follow the law. Although we may not agree with the judge's ruling we will abide by it and take the necessary steps to provide the best amenities for the community that we can."

He should stand by his statement. Fanita Ranch is NOT the best amenity for the community. The best for the community is to leave the land as is. Listen to the environmentalists, the judges, and people that you are supposed to be representing and do not continue to find new loopholes and dishonest ways to try and get this built.

Thank you,
Sara Deacon

Comment Letter I49: Amy Donahue, March 31, 2025

I49



From: Sandi Sawa
To: Marni Borg
Subject: FW: fanita ranch
Date: Monday, March 31, 2025 4:00:31 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: amy donahue <aed320@gmail.com>
Sent: Monday, March 31, 2025 3:58 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: fanita ranch

I49-1 Hello, I am writing today about the proposal of Fanita Ranch. I've been a resident of Santee since 2009. I moved from Granada Hills in the San Fernando Valley. Traffic was always awful and is now unbearable in L.A. Over the past few years traffic has become unbearable in Santee. The 52 is the worst freeway I've been on ever. My husband, a lifelong Santee resident, drives it everyday to work and sits in traffic no matter when he leaves. He then gets home so late to avoid traffic that he misses time and experiences with our 2 small children. The 52 has in essence made me a single mom. Building thousands of more homes is something no one in Santee wants. We do not have the stores to support this influx of people, not to mention the fire station or roads. Santee used to be out in the sticks and it is becoming so congested that everyone living here hates it. The voters have spoken and do not want this development!

- Amy

I49-1: This comment discusses the existing traffic conditions along State Route 52 and expresses concern that the fire stations cannot support it. The comment also states that the existing fire station and roads cannot support the Fanita Ranch Project (proposed project).

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

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Comment Letter I50: Joseph Eigner, March 31, 2025

I50

From: Sandi Sawa
To: Marni Borg
Subject: FW: Please consider Santee residents wishes
Date: Monday, March 31, 2025 10:15:55 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: joe eigner <joeeigner@yahoo.com>
Sent: Monday, March 31, 2025 10:15 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Please consider Santee residents wishes

I50-1 Hello, I have been a resident of Santee my entire life, since 1976. I have seen this city grow and grow and grow. Our infrastructure is Cleary at max capacity as evident by the non stop traffic on Mission Gorge and the horrendous traffic on the 52 every morning and afternoon. Please consider Santee residents wishes and do not make matters worse by allowing Fanita Ranch to proceed. My wife and children will have no option but to pack our bags and move from the city that we once loved.

Sincerely,

Joseph A. Eigner

Joseph A. Eigner, Inc., RDCS, Technical Director
Zavaro Cardiovascular Institute
300 S. Pierce St. Suite 102
El Cajon, CA 92020

- 619.729.5104 Cell
- 619.668.4700 Office
- 619.668.0049 fax

I50-1: This comment states that the existing infrastructure is at maximum capacity and implementation of the Fanita Ranch Project (proposed project) could worsen it.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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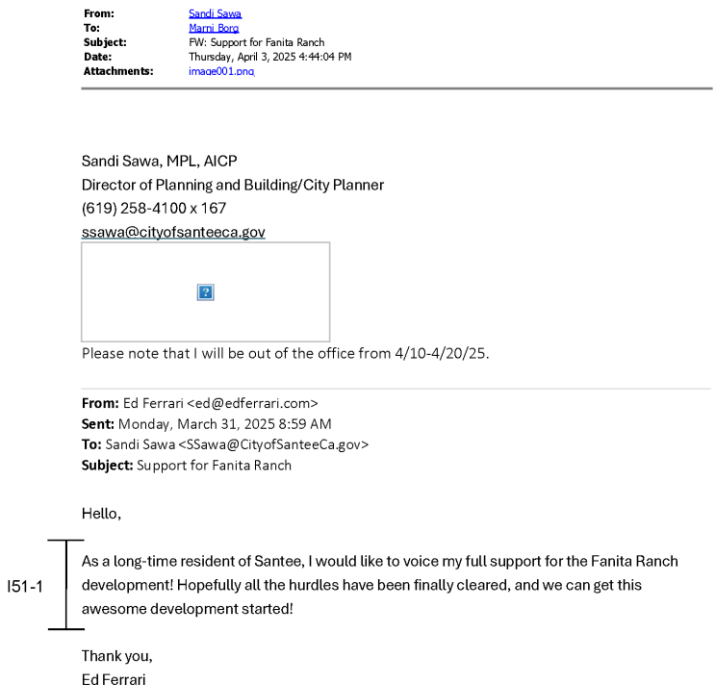
Comment Letter I51: Ed Ferrari, March 31, 2025

I51



From: Sandi Sawa
To: Marni Borg
Subject: FW: Support for Fanita Ranch
Date: Thursday, April 3, 2025 4:44:04 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Ed Ferrari <ed@edferrari.com>
Sent: Monday, March 31, 2025 8:59 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Support for Fanita Ranch

Hello,

I51-1 As a long-time resident of Santee, I would like to voice my full support for the Fanita Ranch development! Hopefully all the hurdles have been finally cleared, and we can get this awesome development started!

Thank you,
Ed Ferrari

I51-1: This comment letter expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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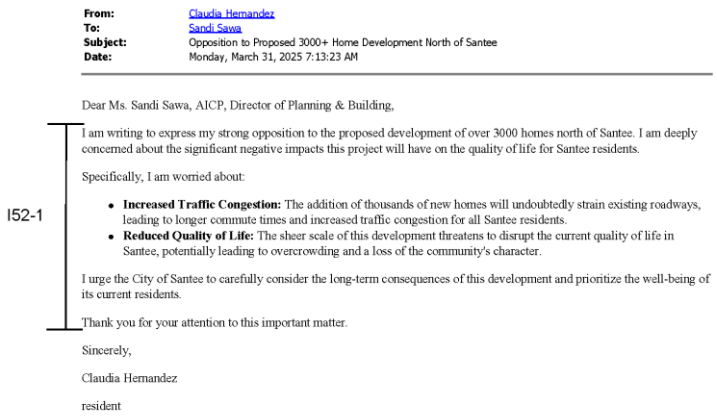
Comment Letter I52: Claudia Hernandez, March 31, 2025

I52



From: Claudia Hernandez
To: Sandi Sawa
Subject: Opposition to Proposed 3000+ Home Development North of Santee
Date: Monday, March 31, 2025 7:13:23 AM

Dear Ms. Sandi Sawa, AICP, Director of Planning & Building,

I52-1

I am writing to express my strong opposition to the proposed development of over 3000 homes north of Santee. I am deeply concerned about the significant negative impacts this project will have on the quality of life for Santee residents.

Specifically, I am worried about:

- **Increased Traffic Congestion:** The addition of thousands of new homes will undoubtedly strain existing roadways, leading to longer commute times and increased traffic congestion for all Santee residents.
- **Reduced Quality of Life:** The sheer scale of this development threatens to disrupt the current quality of life in Santee, potentially leading to overcrowding and a loss of the community's character.

I urge the City of Santee to carefully consider the long-term consequences of this development and prioritize the well-being of its current residents.

Thank you for your attention to this important matter.

Sincerely,

Claudia Hernandez

resident

I52-1: This comment states that the Fanita Ranch Project (proposed project) would result in increased traffic and reduced quality of life.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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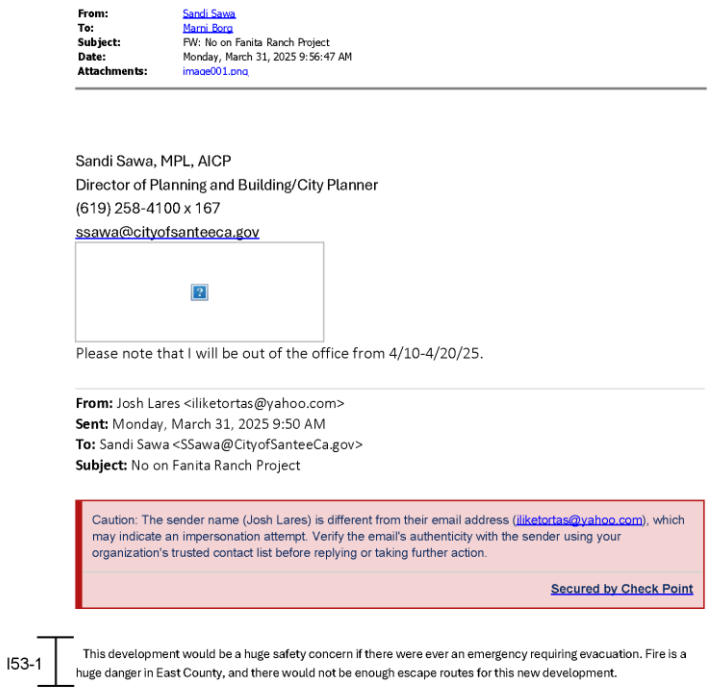
Comment Letter I53: Josh Lares, March 31, 2025

I53



From: Sandi Sawa
To: Marni Borg
Subject: FW: No on Fanita Ranch Project
Date: Monday, March 31, 2025 9:56:47 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Josh Lares <iliketortas@yahoo.com>
Sent: Monday, March 31, 2025 9:50 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: No on Fanita Ranch Project

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

Secured by Check Point

I53-1 This development would be a huge safety concern if there were ever an emergency requiring evacuation. Fire is a huge danger in East County, and there would not be enough escape routes for this new development.

I53-1: This comment states that implementation of the Fanita Ranch Project (proposed project) would result in safety concerns during an emergency evacuation.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I54: Jo Malo, March 31, 2025

I54

From: Sandi Sawa
To: Marni Borg
Subject: FW: Proposed Fanita Ranch Project
Date: Monday, March 31, 2025 2:10:31 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: JoJo Malo <jojom1585@gmail.com>
Sent: Monday, March 31, 2025 1:48 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Proposed Fanita Ranch Project

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Council
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch

Dear Director Sawa and Santee City Council,

I have lived in Santee for over 25 years and I am tired of fighting this same battle over this insane idea of building 3000 new homes north of my house on Sima Ct. I have lost faith in our mayor and city council who insist on keeping this dangerous idea alive.

I54-1 Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

I54-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone and lacks evacuation routes. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Our Lawsuit challenging Fanita Ranch approval was successful. The ruling is under appeal by land speculator Jeffries Financial Group of NY

Fanita Ranch Plans Ignore Fire Dangers, Lack Safe Evacuation Routes

I54-1 cont.

"California's affordable housing crisis doesn't give cities free rein to build unsafe homes in places like Fanita Ranch," said Peter Broderick, an attorney at the Center for Biological Diversity. "To prepare for the next disaster, we have to be smarter about where we build, with safety plans that account for the realities of fast-moving fires. Otherwise, we'll put entire communities in grave danger."

The statement by attorney Peter Broderick was long before the devastating Los Angeles wildfires of 2025.

Please don't put us in the path of what could be the worst catastrophic fire event in the history of California!

Sincerely,

Jo Malo
10805 Sima Ct
Santee CA 92071

Comment Letter I55: Steve Norquist, March 31, 2025

I55

From: Sandi Sawa
To: Marni Borg
Subject: FW: 3000 new homes in Santee?
Date: Monday, March 31, 2025 1:03:08 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Steven Norquist <stevennorquist@yahoo.com>
Sent: Monday, March 31, 2025 12:52 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: 3000 new homes in Santee?

I55-1

I have lived in Santee since 1982.
Part of the charm of the city is that it remains *small*.
A close community with high standards.
I would not want to have 3000 more homes shoved into the city.
The impact would likely be very negative.
Hopefully it can be blocked or avoided.

Steven Norquist

I55-1: This comment expresses general opposition to 3,000 more homes in the City of Santee.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

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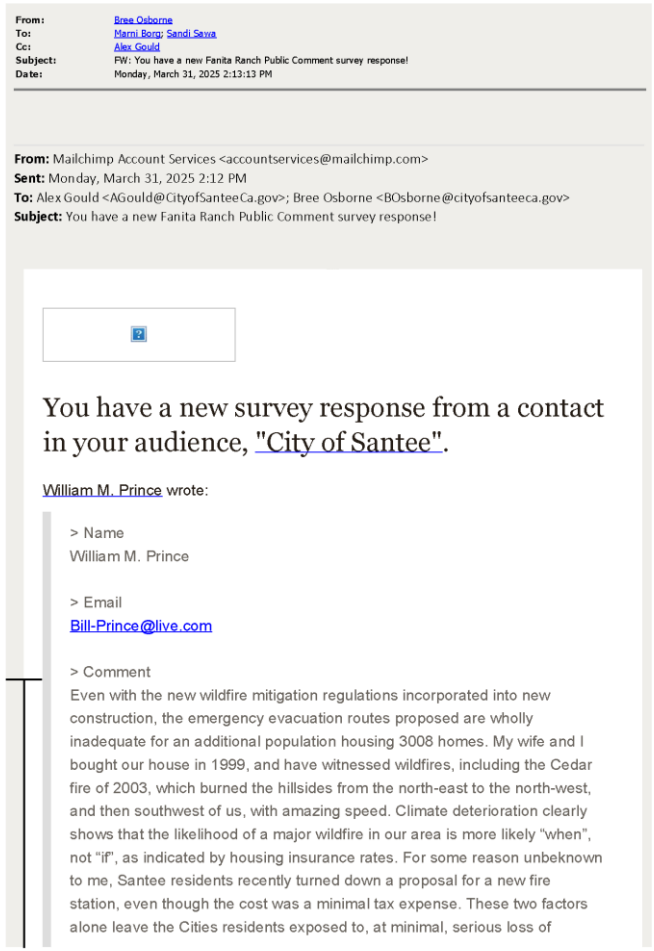
Comment Letter I56: William Prince, March 31, 2025

I56



From: Bree Osborne
To: Marni Borg; Sandi Sawa
Cc: Alex Gould
Subject: FW: You have a new Fanita Ranch Public Comment survey response!
Date: Monday, March 31, 2025 2:13:13 PM

From: Mailchimp Account Services <accountservices@mailchimp.com>
Sent: Monday, March 31, 2025 2:12 PM
To: Alex Gould <AGould@CityofSanteeCa.gov>; Bree Osborne <BOsborne@cityofsanteeca.gov>
Subject: You have a new Fanita Ranch Public Comment survey response!

You have a new survey response from a contact in your audience, "City of Santee".

William M. Prince wrote:

> Name
William M. Prince

> Email
Bill-Prince@live.com

> Comment
Even with the new wildfire mitigation regulations incorporated into new construction, the emergency evacuation routes proposed are wholly inadequate for an additional population housing 3008 homes. My wife and I bought our house in 1999, and have witnessed wildfires, including the Cedar fire of 2003, which burned the hillsides from the north-east to the north-west, and then southwest of us, with amazing speed. Climate deterioration clearly shows that the likelihood of a major wildfire in our area is more likely "when", not "if", as indicated by housing insurance rates. For some reason unbeknown to me, Santee residents recently turned down a proposal for a new fire station, even though the cost was a minimal tax expense. These two factors alone leave the Cities residents exposed to, at minimal, serious loss of

I56-1

I56-1: This comment states that the evacuation routes proposed for the Fanita Ranch Project (proposed project) are inadequate. It also states that the area already experiences traffic congestion.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I56-1 cont.

property, and, at maximum, life and home. Anyone who lives in north Santee experiances serious traffic congestion daily on Magnolia and Cuyamaca, north-south, and Mission Gorge and Mast, east-west. These routes are essential for accessing the next major highways necessary for relocation to a safer location. The Paradise fire in Northern California, as well the Pacific Palaces fire, recently, clearly shows how rapidly fire can spread, when boosted by Santa Ana winds. Even with the current population in Santee, daily workday traffic congestion contributes to long delays in getting onto the 52 and the 67 north, south freeways, which are often closed themselves. Evidence of people trapped in their cars while surrounded by raging infernos and eventually having to walk out is something I hope to never experiance again, but fear is likely to happen, IF appropriate counter-measures are not taken.

Yes, Southern California needs more housing,-and I realize the infrastructure will require expansion for a larger population,-but most important should be the residents safety, then security of property. Please consider my concerns for quality of life in Santee. Thank you.

View Message

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Comment Letter I57: Nelly Purvis, March 31, 2025

I57

From: Sandi Sawa
To: Marni Borg
Subject: FW: UNSAT Housing Development
Date: Monday, March 31, 2025 5:08:34 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Nelly Purvis <nmartin7687@hotmail.com>
Sent: Monday, March 31, 2025 4:50 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: UNSAT Housing Development

Good afternoon

I57-1

I am not sure if this email will bear any weight with the decision process for the 3,000 additional housing Development to be built in North Santee. I'm quite frustrated with how the Developers are able to take advantage of the citizens disapproval for that project, and still push to move forward. The citizens have already voted and spoken against this and it seems like everything we had spoken out about this developer has been tossed aside. No means no. This is a horrible situation when an organization doesn't understand the concept of NO

It seems like this developer has made false promises to improve the freeway condition before building in the past. Then that fell through. They also bypassed the fact that building within that area is a potential fire hazard. These developers are constantly trying to find loopholes even after it was voted against them.

We had issues with the horrific morning traffic commute along that same area all the way up to the 52 freeway. Our residents had to deal with power outages just recently, so now we're adding more people?? How is that going to be any better for us with that situation.

I57-1: The comment requests acknowledgment that Santee citizens have already voted. It also states that the Fanita Ranch Project (proposed project) would be located in an area that is a potential fire hazard and that the area already experiences traffic and energy outage issues.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I57-1 cont.

We have alot of the locals report seeing, a wide variety of animals that live back there in that area. Mountain bikers have seen coyotes, a mountain lion, deer, and other wildlife. The animals keep getting pushed out to a smaller area.

It seems one sided to support this developer when the people have already spoken. Mark my words, whoever supports this within the city council members, I vow to never submit my vote for them ever again in the future. I also am a member of a group that supports preserving the land from unnecessary development and I will spread the word to fight against this. I myself have voted No for this and now I'm hearing this Development is moving forward. I really hope that is not the case. Please hear the plee from the Santee Residents. We don't need any more houses in our area.

Another inconsiderate developer is building homes next to Hilliker's Farm which is comical. These developers don't care about us, they don't care about the traffic or shoving more people. They especially don't care that people are going to live next to a smelly farm just like the housing development on the other side of Hilliker's. Spend the whole day there and find out how nice the aroma is from that farm. Granted, I appreciate that farm and would rather have that farm there then a bunch more houses.

Please don't improve Fanita Ranch or any development.

Very Respectfully

Nelly Purvis
Santee Ca

Comment Letter I58: Jeanne Raimond, March 31, 2025

I58

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch development
Date: Monday, March 31, 2025 11:23:43 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: JEANNE RAIMOND <jraim@cox.net>
Sent: Monday, March 31, 2025 11:23 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch development

Dear Madam,

I58-1 As a citizen of Santee I support my right to vote on the control of development on the Fanita Ranch property. We voters should not be bypassed by decisions made by the City Council.

In fact, I feel NO development should occur in this high fire risk area which is included in a map recently published in the UT. It is foolishness as its highest and puts the rest of us homeowners at risk.

Jeanne Raimond
10828 Greencastle ST.
Santee,CA

I58-1: The comment requests acknowledgment of the Santee voters' and the judge's previous decision on the Fanita Ranch Project (proposed project).

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I59: Marsha Taylor, March 31, 2025

I59

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the final REIR for Fanita Ranch
Date: Monday, March 31, 2025 3:34:52 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Marsha Taylor <marsha5200@gmail.com>
Sent: Monday, March 31, 2025 2:54 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the final REIR for Fanita Ranch

I59-1 Dear Director Sawa and Santee City Council,
Please respect the court and Santee Voters' right to control zoning of Fanita Ranch.
Reject the new scheme to bypass Santee Voters.
Designating 445 units as Senior Housing with placement in the most elevated fire hazard severity is unconscionable in the wake of the recent death and destruction during the LA fires.
Nearly all fatalities were senior citizens.
Thank you,
Marsha Taylor

I59-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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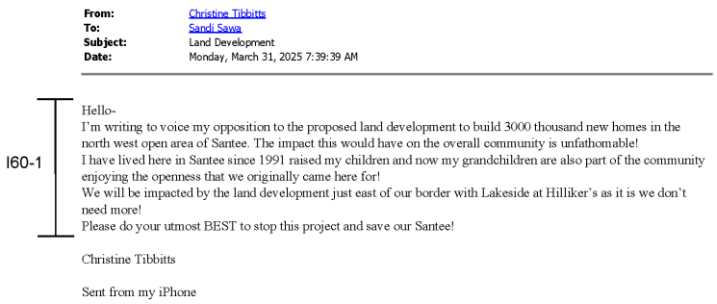
Comment Letter I60: Christine Tibbitts, March 31, 2025

I60



From: Christine Tibbitts
To: Sandi Sawa
Subject: Land Development
Date: Monday, March 31, 2025 7:39:39 AM

I60-1

Hello-
I'm writing to voice my opposition to the proposed land development to build 3000 thousand new homes in the north west open area of Santee. The impact this would have on the overall community is unfathomable!
I have lived here in Santee since 1991 raised my children and now my grandchildren are also part of the community enjoying the openness that we originally came here for!
We will be impacted by the land development just east of our border with Lakeside at Hilliker's as it is we don't need more!
Please do your utmost BEST to stop this project and save our Santee!

Christine Tibbitts

Sent from my iPhone

I60-1: This comment expresses general opposition to the Fanita Ranch Project (proposed project).

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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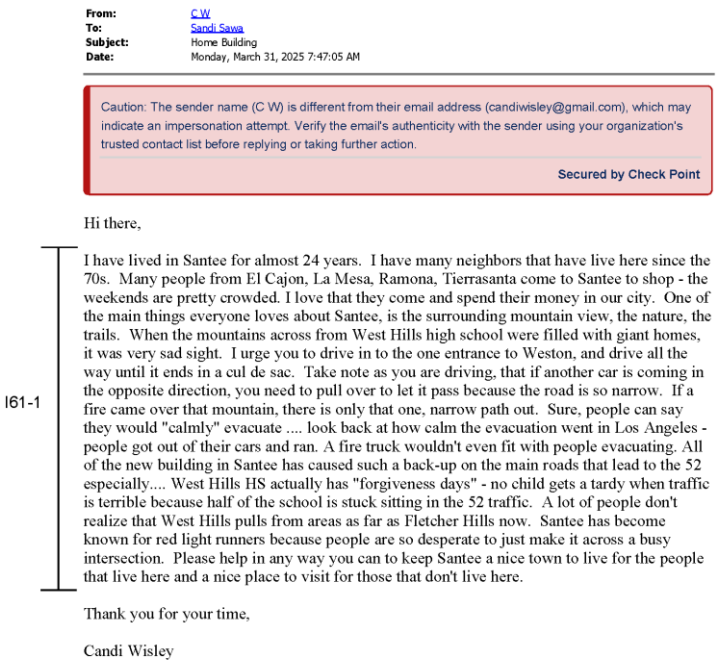
Comment Letter I61: Candi Wisley, March 31, 2025

I61



From: C W
To: Sandi Sawa
Subject: Home Building
Date: Monday, March 31, 2025 7:47:05 AM

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

Secured by Check Point

Hi there,

I61-1

I have lived in Santee for almost 24 years. I have many neighbors that have live here since the 70s. Many people from El Cajon, La Mesa, Ramona, Tierrasanta come to Santee to shop - the weekends are pretty crowded. I love that they come and spend their money in our city. One of the main things everyone loves about Santee, is the surrounding mountain view, the nature, the trails. When the mountains across from West Hills high school were filled with giant homes, it was very sad sight. I urge you to drive in to the one entrance to Weston, and drive all the way until it ends in a cul de sac. Take note as you are driving, that if another car is coming in the opposite direction, you need to pull over to let it pass because the road is so narrow. If a fire came over that mountain, there is only that one, narrow path out. Sure, people can say they would "calmly" evacuate .... look back at how calm the evacuation went in Los Angeles - people got out of their cars and ran. A fire truck wouldn't even fit with people evacuating. All of the new building in Santee has caused such a back-up on the main roads that lead to the 52 especially.... West Hills HS actually has "forgiveness days" - no child gets a tardy when traffic is terrible because half of the school is stuck sitting in the 52 traffic. A lot of people don't realize that West Hills pulls from areas as far as Fletcher Hills now. Santee has become known for red light runners because people are so desperate to just make it across a busy intersection. Please help in any way you can to keep Santee a nice town to live for the people that live here and a nice place to visit for those that don't live here.

Thank you for your time,

Candi Wisley

I61-1: This comment discusses views of the mountains, the existing traffic congestion in the City of Santee, and evacuation in the case of a fire.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

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Comment Letter I62: Mike Dolan, April 1, 2025

I62

From: Sandi Sawa
To: Marni Borg
Subject: FW: Santee residents; The People
Date: Tuesday, April 1, 2025 12:24:43 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Mike Dolan <mikeadolan619@gmail.com>
Sent: Tuesday, April 1, 2025 10:24 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Santee residents; The People

I62-1 To: Sandi Sawa, hello my name is Mike Dolan, I've been a Santee resident for 30 plus years. I've watched the city grow over the decades now and have experienced the current traffic from day to day, it is probably beyond what most residents would desire.
I don't believe the state can enforce more housing with our current traffic density and lack of evacuation routes. I also think that City management needs to be done in another way than continued growth to pay for current upkeep such as the streets that are becoming kind of embarrassing in certain areas main roots not only neighborhood streets. I.E. The added dwellings that have increased traffic density do not seem to be helping City maintenance costs.
Thank you for your service

I62-1: This comment states that the commenter does not believe that the state can enforce more housing with the current traffic density and lack of evacuation routes. It also states that added dwellings do not seem to be helping City of Santee maintenance costs.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

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Comment Letter I63: Jon Fleming, April 1, 2025

I63

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Tuesday, April 1, 2025 1:36:31 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: J <jonathan461@hotmail.com>
Sent: Tuesday, April 1, 2025 1:34 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Caution: The sender name (J) is different from their email address (jonathan461@hotmail.com), which may indicate an impersonation attempt. Verify the email's authenticity with the sender using your organization's trusted contact list before replying or taking further action.

Secured by Check Point

Director Sawa and Santee City Council,

I63-1 Reject the new scheme to bypass Santee voters on this matter. The voters and Judge have already made their position clear.

Thank you,
Jon Fleming
Santee resident and homeowner

I63-1: The comment requests acknowledgment of the Santee voters' and judge's previous decision on the Fanita Ranch Project (proposed project).

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I64: Ioana Vladescu, April 1, 2025

I64

From: Sandi Sawa
To: Marni Borg
Subject: FW: NO FANITA RANCH CONSTRUCTIONS
Date: Tuesday, April 1, 2025 8:14:08 AM

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

-----Original Message-----
From: Ioana Vladescu <cbswx@yahoo.com>
Sent: Tuesday, April 1, 2025 8:00 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: NO FANITA RANCH CONSTRUCTIONS

Good Morning Sandi,

I64-1 As a Santee residents do not agree with the Fanita Ranch, build out. What do we need to do, to make sure that does not happen until there is another way for those residents to leave that area besides on mast blvd and 52.

We already spend hours in/out of Santee.

Thank you,
Ioana Vladescu
Santee Resident

I64-1: This comment expresses general opposition to the Fanita Ranch Project (proposed project) and the lack of exit routes.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I65: Gabriela O'Sullivan, April 2, 2025

I65

From: Sandi Sawa
To: Marni Borg
Subject: FW: DO NOT APPROVE FANITA RANCH
Date: Wednesday, April 2, 2025 12:19:52 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: G Guess <gabriela.guess13@gmail.com>
Sent: Wednesday, April 2, 2025 11:53 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: DO NOT APPROVE FANITA RANCH

Good afternoon,

I65-1 I am emailing today as a resident and homeowner of santee to express my extreme opposition to the Fanita Ranch project. This plan continues to be pushed despite our community being in stark opposition. The addition of 3000 homes and building that community will greatly impact our small town in a multitude of ways. The largest impact will be on the worsening of roadway traffic. This project plans to use our two main roadways as methods of entrance and exit from the community. Our rush hour traffic is already out of hand with only two ways to get in and out of Santee itself. I myself live only 10 miles from my job and yet it regularly takes me 45-60 min to get from my home to my work and back because of this traffic.

Additionally it will strain our communities fire and law enforcement resources as well.

If the developers are so set on building this community they need to look to the north for building roadways and leave santee alone.

please do not approve this build THE VOTERS AND RESIDENTS OF SANTEE DO NOT WANT THIS!
Thank you,

Gabriela O'Sullivan

I65-1: This comment states that the Fanita Ranch Project (proposed project) would worsen roadway traffic and strain fire and law enforcement resources.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I66: Jacob Syage (1), April 2, 2025

I66

From: Sandi Sawa
To: Marni Borg
Subject: FW: Citizen Opposition Note - Proposed Fanita Ranch Housing Project
Date: Wednesday, April 2, 2025 10:50:13 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: J. Sy <jsyage33@gmail.com>
Sent: Wednesday, April 2, 2025 9:42 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Citizen Opposition Note - Proposed Fanita Ranch Housing Project

Dear Santee City Council and Sandi Sawa,

It is with great concern as a local citizen, power systems engineer, and homeowner in Santee that I voice my strong opposition for the development of the proposed Fanita Ranch housing project. This project was voted down by citizens previously, and the sentiment of the greater community must be the driving force behind the future formal approval or opposition of this project.

I66-1

The city of Santee is highly route constrained and already suffers from extensive traffic delays during normal commutes in fair weather. During emergency circumstances, especially wildfires, evacuations with the addition of 3,000 homes/~9,000 additional citizens built within Cal Fire's highest risk category zoning would prove disastrous to citizens of our community and our infrastructure.

Additionally, insuring these homes with a private insurer will prove to be almost impossible. My home is nowhere near a major fire risk zone and my neighbors and I are already at risk of non-renewal this year with major insurance carriers. Some have already received notices that they will be dropped at their current policy expiration date. This will leave us with the now-

I66-1: This comment states that the City of Santee already experiences extensive traffic delays, which would worsen during an emergency evacuation with implementation of the Fanita Ranch Project (proposed project). In addition, this comment raises concerns over insurance, voting, and the additional population without improvements to school capacity, roadway access, cellular availability, and electrical capacity.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I66-1 Cont.

financially depleted California FAIR plan as the only option.

The city is not prepared to add ~15% to our population, without added improvements in school capacities, expanded roadway access (52 Mast bridge expansion, connect to Highway 67 and Scripps Poway Parkway), cellular/fiber connections, and additional electrical capacity with grid reliability improvements.

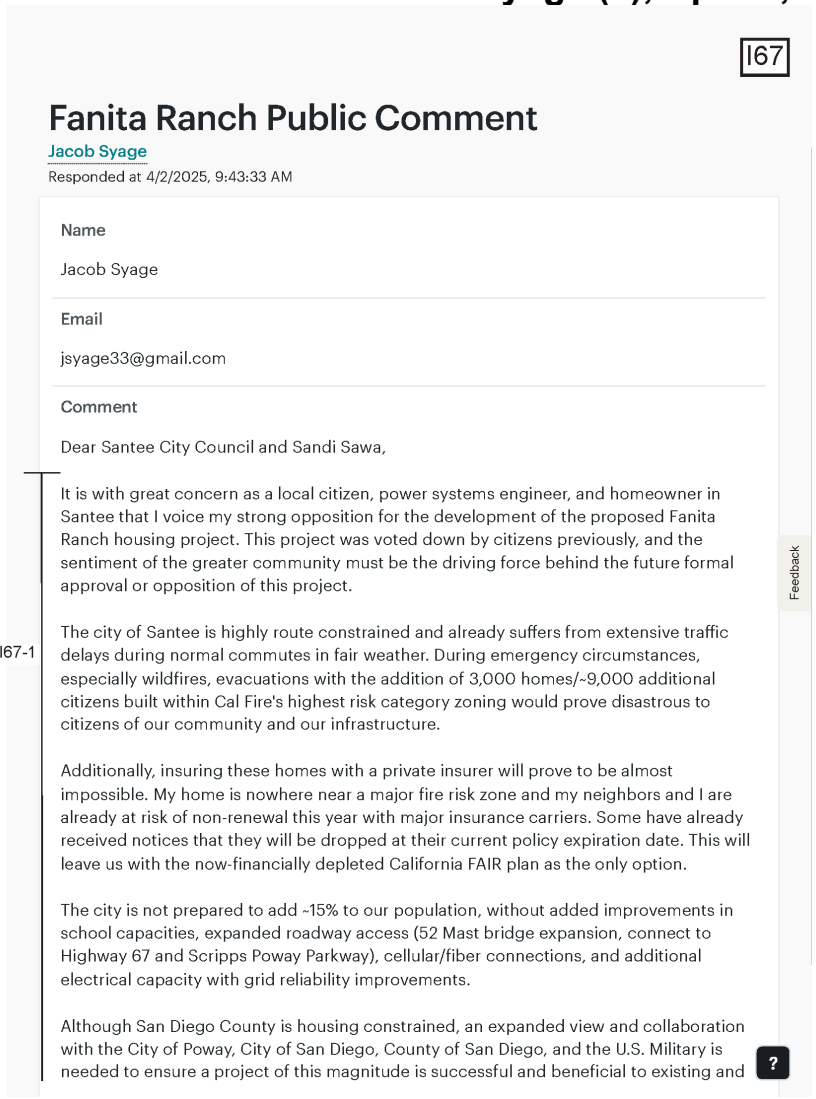
Although San Diego county is housing constrained, an expanded view and collaboration with the City of Poway, City of San Diego, County of San Diego, and the U.S. Military is needed to ensure a project of this magnitude is successful and beneficial to existing and future citizens of our region and the surrounding cities.

I would like to formally oppose the current proposed project, but I encourage the development teams to take a more holistic approach to future design iterations that include developments in access infrastructure and collaboration with our surrounding communities.

Thank you.

Jacob Syage
619-994-4718

Comment Letter I67: Jacob Syage (2), April 2, 2025



I67

Fanita Ranch Public Comment

Jacob Syage

Responded at 4/2/2025, 9:43:33 AM

Name

Jacob Syage

Email

jsyage33@gmail.com

Comment

Dear Santee City Council and Sandi Sawa,

It is with great concern as a local citizen, power systems engineer, and homeowner in Santee that I voice my strong opposition for the development of the proposed Fanita Ranch housing project. This project was voted down by citizens previously, and the sentiment of the greater community must be the driving force behind the future formal approval or opposition of this project.

I67-1 The city of Santee is highly route constrained and already suffers from extensive traffic delays during normal commutes in fair weather. During emergency circumstances, especially wildfires, evacuations with the addition of 3,000 homes/~9,000 additional citizens built within Cal Fire's highest risk category zoning would prove disastrous to citizens of our community and our infrastructure.

Additionally, insuring these homes with a private insurer will prove to be almost impossible. My home is nowhere near a major fire risk zone and my neighbors and I are already at risk of non-renewal this year with major insurance carriers. Some have already received notices that they will be dropped at their current policy expiration date. This will leave us with the now-financially depleted California FAIR plan as the only option.

The city is not prepared to add ~15% to our population, without added improvements in school capacities, expanded roadway access (52 Mast bridge expansion, connect to Highway 67 and Scripps Poway Parkway), cellular/fiber connections, and additional electrical capacity with grid reliability improvements.

Although San Diego County is housing constrained, an expanded view and collaboration with the City of Poway, City of San Diego, County of San Diego, and the U.S. Military is needed to ensure a project of this magnitude is successful and beneficial to existing and

Feedback

?

I67-1: This comment letter is a repeat of Comment Letter I66. Please refer to Response to Comment I66-1, which addresses the same issue raised in this comment.

I67-1 cont.

future citizens of our region and the surrounding cities.

I would like to formally oppose the current proposed project in its current form.

Feedback

Comment Letter I68: Brandy Alvarez, April 3, 2025

I68

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 3, 2025 11:41:40 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Brady Alvarez <bradypalvarez@gmail.com>
Sent: Thursday, April 3, 2025 10:04 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Clerk <clerk@cityofsanteeca.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and the Santee City Council,

Do we want San Diego county to become Los Angeles? Where almost every square inch of natural environment has been turned into a road, building or parking lot?

I68-1

I first discovered Sycamore Canyon many years ago. As a San Diego native and naturalist, I was amazed by this untouched natural environment. Wild artichoke, bountiful oak trees, birds and tarantulas. It is the quietest place within Santee city limits. A place for reflection and admiration of our natural environment. This new housing development would change all of that.

Once this environment is encroached upon and destroyed, it will never come back. Humans need places to live. But we also need nature, for clean water, recreation and education. The wild environment-- the canyons, valleys, oceans are what make San Diego and Santee unique and appealing.

Please respect the courts and voters' rights to control zoning of Fanita Ranch. Don't let an

I68-1: This comment states that the biological and recreational resources within Sycamore Canyon would be impacted by implementation of the Fanita Ranch Project (proposed project). It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I68-1 cont. New York development country destroy natural habitat for the sake of greed and profit.

Thank you,
Brady Alvarez

Comment Letter I69: Ava Torre-Bueno, April 3, 2025

I69

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 3, 2025 12:28:35 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Ava Torre-Bueno <avatb3@gmail.com>
Sent: Thursday, April 3, 2025 12:25 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Council

Dear Director Sawa and Santee City Council,

I69-1

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you

Ava Torre-Bueno

I69-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I70: Mary and J.M. Vargo, April 4, 2025

I70

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch Development
Date: Friday, April 4, 2025 11:49:43 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: J. M. Vargo <jmvargo1910@gmail.com>
Sent: Friday, April 4, 2025 11:28 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: savefanita@10311323.mailchimpapp.com
Subject: Fanita Ranch Development

I70-1

We have resided in Santee for 10+ years and have fought the bi-daily rush hour traffic in Santee mornings and late afternoons making it very inconvenient to travel. Another 6000 cars from 3000 more families will obviously not help that situation.

Nobody in my neighborhood and, in fact, no Santee residents that I have discussed this with is in favor of the proposed Fanita Ranch development.

When Hizzoner and city council members insist on thwarting the will of the voters, there is only one conclusion to be drawn - MONEY! Kickbacks perhaps? Or direct campaign contributions. We voted for John Minto the first time he ran for mayor, but now would cheerfully sign a recall petition if he continues to attempt to force his will. Something smells bad.

Wise up City administration. NOBODY but you wants this.

Mary and J.M. Vargo
El Nopal Estates, 92071

I70-1: This comment states that the Fanita Ranch Project (proposed project) would result in increased traffic on already crowded roadways.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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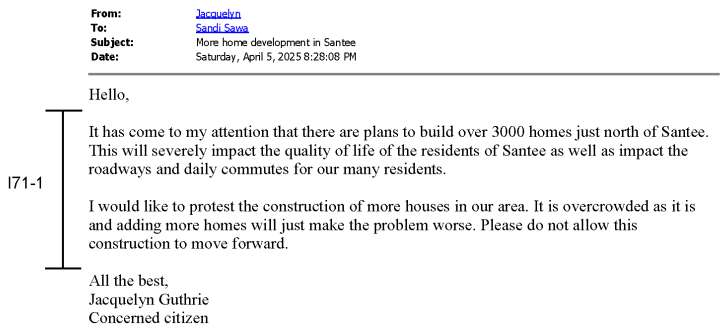
Comment Letter I71: Jacquelyn Guthrie, April 5, 2025

I71



From: Jacquelyn
To: Sandi Sawa
Subject: More home development in Santee
Date: Saturday, April 5, 2025 8:28:08 PM

Hello,

I71-1 It has come to my attention that there are plans to build over 3000 homes just north of Santee. This will severely impact the quality of life of the residents of Santee as well as impact the roadways and daily commutes for our many residents.

I would like to protest the construction of more houses in our area. It is overcrowded as it is and adding more homes will just make the problem worse. Please do not allow this construction to move forward.

All the best,
Jacquelyn Guthrie
Concerned citizen

I71-1: This comment states that the Fanita Ranch Project (proposed project) would impact quality of life, traffic, and daily commutes.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I72: Iliana Sonntag, April 5, 2025

I72

From: Iliana Sonntag
To: Sandi Sawa
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch SCH#200506118
Date: Saturday, April 5, 2025 4:16:43 PM

Dear Director and Santee City Council,

I72-1

The time has come to end this project for good. We have repeatedly made our voices heard and voted down this development in Santee.
We deserve respect as voters and citizens of this city. The court deserves respect as well. Reject this new scheme and deny construction
one final time. This country is founded on the principles of democracy and the citizens of Santee have rejected this Fanita Ranch housing
project several times already! Listen to us!!

The reasons for denial of this massive construction project remain the same. Elevated high risk fire danger continues to grow! Placing housing for the
elderly in a high fire danger area is a disaster in the making. The elderly are most prone to be left behind during fires and they cannot fend for themselves.
There would be no safe evacuation zones from this development and the few roads that exist will be massively congested with all the existing homes
and residents living there already!

In addition to this, Fanita Ranch provides a habitat for 21 mammal species, 22 species of reptiles and 29 species of butterflies. It is also the home
of over 100 bird species including the threatened California gnatcatcher and the endangered least Bell's vireo. Fanita's steep unstable slopes act
as a natural urban growth boundary, scenic viewshed and a logical extension of Mission Trails Regional Park. Destruction of this area would be sinful.

Respectfully,
Iliana Sonntag
Santee Lakes East

I72-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in a high fire danger area and expresses concern regarding evacuation and traffic. It also states that the proposed project area is home to many mammal, reptile, butterfly, and bird species.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I73: Jan Charvat, April 6, 2025

I73-1: The comment requests to acknowledge the Court's decisions and Santee voters' decision to control zoning of Fanita Ranch. The comment also states that the Fanita Ranch Project (proposed project) would place residential development in a high risk fire zone and expresses concern related to evacuation in a dense traffic area.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I74: David Dugger, April 6, 2025

I74

April 6, 2025

Sandi Sawa, AICP, Director of Planning & Building
City of Santee
Emailed: ssawa@cityofsanteeca.gov

RE: Fanita Ranch Second Recirculated Sections Final Revised EIR

Dear Ms. Sawa,

As a former Cal Fire Defensible Space Inspector, please consider my comments on the revised Fanita Ranch project environmental document ("EIR"). My experiences as both a fire inspector and educator provide unique insight into the specific issues of defensible space, wildfire evacuation and public ability to prepare for wildfire emergencies.

The latest proposal would add senior housing. What this senior housing will specifically look like is not addressed in project details. There is no site map indicating where the senior housing will be located. There are no details on the type of housing (i.e., assisted living with multiple tiers of care provided, multiple unit congregated housing, individual units, etc.) that will be offered to seniors.

I74-1 There are no details about services/infrastructure that would be offered to assist seniors that can have mobility issues, recreation limitations specific to the age group, or retail/services that do not require extended trips out of the community.

There are no percentages of how many units will be low-income, moderate-income units. The Fanita Ranch project is on the outskirts of Santee in a hilly/mountainous region that is not conducive to many senior needs. It has a horseshoe access road connected to a congested east/west arterial road (Mast Blvd.) The project is a significant danger to the senior population proposed for the site who may have normal age-related limitations. In a catastrophic situation these limitations would require rapid responses that may be beyond a senior's ability to perform efficiently to evacuate to safety, as project developers envision for all project residents.

As a DSI, who inspected all through San Diego County in numerous jurisdictions, I witnessed seniors that were in danger within the wildland urban interface (WUI). These seniors usually had been living in their homes for many, many years (in most cases raising generations of family within the family structure.) As DSI

I74-1: This comment states that the latest proposal would add senior housing and includes several questions on the project description. The Fanita Ranch Project (proposed project) itself has not changed from that analyzed in the certified 2020 Final Revised Environmental Impact Report (EIR). Please refer to Thematic Response 1, Recirculation and Scope of Review Claims.

This comment also states that the proposed project is located in a Very High Fire Hazard Severity Zone, and describes the difficulties seniors may face during a wildfire evacuation. Please refer to Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

inspectors we worked closely to make these residents aware of the existing fire dangers in their community and to the specific risks their property exhibited.

We provided guidance to resolve fire related issues and bring their homes into code compliance. Overall, I found that seniors were receptive to resolving the issues that had been identified as defensible space violations and accomplishing the required work to the best of their ability. However, I observed that seniors often took more time to resolve the identified violations, which required extensions and multiple re-inspections. Some properties never resolved the violations or only achieved temporary compliance.

Many seniors shared that they did not have the financial resources to hire a company to immediately fix the issues. Many stated they were on a fixed income and/or were only able to do the work themselves. Often, I observed that each week the green recycle containers were full as they worked to satisfy the issues identified.

I74-1 cont.

I expect Fanita Ranch to have similar obstacles to keeping homes compliant as the development ages. Because the development is proposed for a Very High Fire Hazard Severity Zone and homes are close enough together to facilitate structure-to-structure burns, the obstacles seniors face (both physical and financial) to keeping properties compliant are significant. Since it is known that individuals with less financial resources have more violations and it takes more time to bring their homes into compliance, introducing a population, senior or otherwise, with financial and/or physical limitations would introduce significant risk to the development that is avoidable.

The proposal for senior living at Fanita Ranch does not address the type of housing and required services for landscaping. Will the owners be required to provide their own landscaping services or will the project (with a HOA) have landscaping services that will do all (or just front yard) exterior maintenance? If there is a low income/moderate income population, what will be the requirements for maintaining landscaping?

I am a senior over 60 with a replaced hip, and two knee replacements. I have experienced limitations of mobility and need for outside services to assist me back into functional use of my lower limbs. I realize my limitations to this day even with metal joints performing activities I used to do as a 30-year-old. As an older individual I have observed that fellow seniors have a lot of mobility/medical needs.

This first-hand knowledge raises my awareness of the major safety issues of a senior project on Fanita Ranch.

Many seniors I have observed are stubborn about their independence. We fiercely push back at any suggestion that we are incapable of doing activities we have done in the past. Yes, we are slower, more methodical with our actions (usually to not get hurt), but we are determined to do the task that we know we are still capable of doing. This fierce independence from relying on others is a characteristic that could get us killed residing in the Fanita Ranch Very High Fire Hazard Severity Zone. Many of us are also stubborn/unwilling to leave our homes.

Seniors have stuff. We have collections or specific "valuable" individual items; dolls, tools, car, photo albums, etc. that are important to us. In emergencies it is a natural inclination to focus on these items as something that needs to be evacuated along with the dog/cat. Or even worse, stay to the bitter end in denial or a vain hope to protect items relied upon to survive daily.

I74-1 cont.

A Santa Anna wind-driven fire storm that originates close to the project would give seniors very little time to activate a plan to evacuate, even if they prepared one. The important "things" that they feel must be taken to safety, may, in fact, be deadly anchors.

Fire agencies advocate that homeowners have a "go bag" that is ready (usually by front door) at all times during fire season. The standard priority items are important papers, computer hard drives/laptops, a change of clothing, extra medicines, and assorted other necessities. These items should fit into a duffle bag/rolling suitcase that can be thrown in a vehicle/possibly walked out when the homeowner is evacuating. However, it is unknown how many households actually execute this degree of preparation.

These items are just as important for seniors to include. But usually, seniors, as has been earlier noted, have so much more. This project at Fanita Ranch is entirely in a Dark Red Zone critical fire area ("VHFHSZ" designated on the latest fire map posted by CAL FIRE). The time delay for a senior to pack the extra "necessary items" could be the difference between a safe evacuation and being caught in a fire front. How will the project avoid or mitigate for seniors significant physical limitations and behavioral tendencies?

A rational senior living project site should have multiple functioning egress points. It should be without bottleneck choke points (like Mast Blvd. and gridlocked SR67 & SR52.) The site should have multiple avenues for emergency services to assist a senior population.

To avoid the significant adverse impact to public safety of a senior development within a "VHFHSZ", a site off of the WUI, a more insulated area with the highest possibility of survivability in an emergency should be selected. Fanita Ranch exhibits the opposite characteristics of a safe senior community location.

As was observed in many instances with the Altadena, Pacific Palisades and Maui Lahaina firestorms, the residents of the communities became trapped within their neighborhoods because of gridlock of vehicles (primarily abandoned vehicles) in the middle of the road blocking vehicle evacuation options. Frantic evacuees were forced to abandon their vehicle and walk out with what they could carry. At the Fanita Ranch project, they would have the distinct probability that Mast Blvd. would gridlock to prevent evacuation of project residents and existing neighborhoods north of Mast Boulevard. The probability of Fanita Ranch residents abandoning their cars grows exponentially with the approach of a rapid-fire front. Seniors that are gridlocked adjacent to burning vegetation and those who abandon vehicles in this chaotic scenario are likely to suffer fatal burns.

I74-1 cont.

Seniors that rely on others for care services (house bound residents) would be especially vulnerable to a wildland fire storm. They may not be able to evacuate based upon a caregiver's restricted access. Seniors may be living in a congregated senior community with a service staff that may become overwhelmed with a distressed ratio of staff members to residents all needing immediate evacuation assistance. In a "worst case scenario", if a structure the senior resident is living in catches on fire and the senior evacuates to the street, a navigable and walkable (meaning relatively flat) egress to a safety zone is necessary. Where are the evacuation plans, with escape routes and safety zones for the senior neighborhoods?

Senior living, or for that matter any residential living, isolated on a mountainous project site classified "VHFHSZ" is a potential disaster in waiting. The addition of senior housing is a significant and avoidable impact on public safety. Proposing housing for seniors within this identified hazard zone is irresponsible.

Sincerely
/s/

David Dugger
Cal Fire Defensible Space Inspector (2016-2021)
Credentialed Educator
Education master's in administration
Creating member, Valley Center Community Emergency Response Team (CERT)

Comment Letter I75: Sharon Guerrero, April 6, 2025

I75

From: SHARON GUERRERO
To: Sandi Sawa
Subject: Letter re: Fanita Ranch - Second Recirculated Sections, SCH#200506118
Date: Sunday, April 6, 2025 10:17:14 PM
Attachments: Fanita Ranch letter 4-6-25.docx

Hello Director Sawa,
I have attached a letter I would like to share with you and City Council members. Could you please forward the letter to the Mayor and Council members as soon as possible? I only put my name on the letter, but if you need any other information from me, please let me know. I would like this letter to be put in public record, so I did not include my address, phone number or email on it. I hope that is acceptable.
Thank you for your time.

Sharon Guerrero 619-994-1430

I75-1: The comment expresses concern that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch. Additionally, the comment states that the proposed project would impact water, wildlife, endangered species, traffic, and public safety.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

Sandi Sawa, AICP, Director of Planning & Building 4/6/2025
Cc: Santee City Council
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Email: ssawa@cityofsanteeca.gov

To Director Sawa and Santee City Council members,

I am writing this letter due to my concern for the health, safety, & well-being of Santee residents. I have owned 3 homes in different areas of Santee over the last 32 years & I am appalled by the on-going actions of our own Mayor & City Council members regarding the Fanita Ranch proposal. I ask that you respect the Court decision & Santee voters right to control zoning of Fanita Ranch. **Please reject the new scheme to bypass Santee voters**.

I75-1

I understand that HomeFed Corp/The Jeffries Group of New York could care less about the safety or well-being of Santee residents… or the fact that CAL FIRE has designated that area as a "Very High Fire Hazard Severity Zone". As we all know, HomeFed is only concerned about how much money they can make from the land in our community. They have previously contributed funds to our Mayor & some City Council members to gain political favor, & it has worked. It's clear that HomeFed will do whatever they can to make their money, & that includes trying to advertise the development as having "affordable" or "senior" housing, which would be minimal.

With that said, I would expect our elected officials to adequately represent the community they are supposed to serve & protect. Instead, they keep trying to prevent voters from making decisions that greatly impact the community. The Court has already ruled that the Santee City Council should have allowed the citizens to vote on ballot initiative before approving the project, as they violated their own rules regarding new development. It's shameful how the Mayor & some City Council members have pushed their own agenda for personal benefit & do not respect the Courts decisions. The Fanita development was stopped by a public referendum & three Court decisions prior to 2012… yet here we are in 2025 still fighting the same issues because the Developer continues to throw money at officials & associations who will take it.

It's apparent the City Council doesn't want Santee voters to have a say in this project because they know the majority of voters believe it would be detrimental to the safety & well-being of Santee residents… which is why we witness furtive & deceitful behavior. It should be common sense NOT to build approximately 3,000 homes in a Very High Fire Zone, not to mention putting vulnerable seniors there. Our city does not have the infrastructure to support this massive development on the north side of Santee. Additionally, it would have a negative & destructive impact on our water, wildlife, endangered species, traffic, & public safety.

Sincerely,

Sharon Guerrero

Comment Letter I76: Rosemary Hutzley, April 6, 2025

I76

From: Rosemary Hutzley
To: Sandi Sawa
Subject: Fanita Ranch comment.
Date: Sunday, April 6, 2025 6:30:21 AM

Good morning Ms. Sawa,

I76-1

I have a few concerns and comments regarding the building of 3,000 homes in a fire zone.

1. Residents have fought this development for forty years for a variety of reasons: The city went around us and did not allow the people to vote on this housing project which continues to be unpopular.

A. We have antiquated roads in terrible shape/narrow that will prevent a smooth egress and ingress in Santee. During an emergency, the city has a real problem. Lived through evacs, fires around Santee Lakes constant fires in Santee riverbeds and the area where the Cedar fire and Witch Creek burned is in that wildlife quarter behind hills of Santee.

B. Situation was adjudicated a couple of years ago by a San Diego judge-who ruled that area as a fire zone. Insurable?

C. On Mast Blvd, 630-10:00 daily 20 minutes to get on 52 and I live within 2 miles. Ridiculous, the freeway is completely antiquated and takes forever to drive 5 miles. Congestion is terrible going east and west on Santee streets. Now the city wants to make neighborhoods congested going North and South? Emergency Issues?

D. Proposing a senior housing development to skirt the judicial system is just typical for the Santee City Council and a big New York Developer. No seniors will be able to afford those homes nor be able to evacuate. Plainly dishonest, the tactic used by council who voted on the project prior to a community ballot initiative. While we collected signatures, the developer's henchman were trying to obstruct our ability to exercise our citizen rights. Shameful and dishonest.

E. Lastly, the businesses are thriving in Santee-lots of tax money . The city has to be making additional revenue by building on every vacant lot that can be found. Fanita Ranch is just another way of satisfying greed and making our city into an urban style nightmare. Do you like how Clairemont looks? How about El Cajon? We are getting there!

JUST SAY NO FOR GOOD! Rosemary Hutzley

I76-1: This comment states that the Fanita Ranch Project (proposed project) would cause additional traffic in an area already congested, and expresses concern regarding emergency evacuation of senior citizens.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I77: Felicia Kalker, April 6, 2025

I77

From: Felicia K
To: Sandi Sawa
Subject: Stop Fanita Ranch: Keep Santee safe and beautiful
Date: Sunday, April 6, 2025 5:43:36 PM

Dear Director Sawa and Santee City Council,

I77-1

Please understand that we cannot allow the Fanita Ranch development to occur. This would have only a harmful and extremely detrimental impact on the City of Santee and its residents. You must uphold the voters' decision and control zoning of Fanita Ranch. Prove to the voters that you will not take part in any plan to ruin Santee.

First, the development would lead to congestion, traffic, and risk of cutting off a large number of people from safe transport in and out of the area. Imagine the increase in traffic that would occur, and there is only one way in and out. This would necessitate additional road expansions and access points, which in turn leads to additional problems, damage of neighborhoods, and long-term maintenance — but even so, this would not solve the problem. Given that our area here around Santee Lakes is remote and partially cut off from central city traffic patterns and alternate routes, there is already tremendous congestion whenever a lot of people need to get in and out of Santee over by the 125 and the 52 access points off of Mission Gorge Road. I cannot imagine how the City of Santee would cope with any kind of emergency, be it damage to the electrical grid, or fires, or earthquakes or anything else — the current residents would be trapped by increasing the traffic congestion, and you want to add additional thousands of residents in this precise area?

Second, the very beauty and joy of living in Santee is how lovely and semi-rural it is. The whole point of being here is to be apart from the congestion and uglification of the typical urban area. People who live here live here because they don't want to be as far away as Lakeside, but they want the benefit of being near to nature.

In fact, right now the City of Santee has a stellar reputation for maintaining this ideal balance between natural beauty and urban conveniences such as shopping, restaurants and the like. We have a great reputation now, but a development like this would ruin Santee by making it just like the rest of San Diego — overpopulated and overdeveloped.

For a third and important point, the Santee voters have already spoken. Listen to your residents! To do otherwise betrays a complete lack of integrity and honesty. We who live right here know what is going on here better than any developers.

We love our city, and take pride in it being the way it is! We hope you do as well.

Please do not allow the Fanita Ranch development to occur. You can stop this, and maintain the beauty - and safety - of our neighborhoods.

Sincerely,
Felicia Kalker
Santee resident

I77-1: The comment states that the Fanita Ranch Project (proposed project) would result in congestion and increased traffic, including during an emergency. It also expresses concerns that the proposed project would cause overpopulation in a natural area. Additionally, the comment requests acknowledgment of the Santee voters' right to control zoning.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I78: David Kramer, April 7, 2025

I78

From: Sandi Sawa
To: Marni Borg
Subject: FW: Comments IRT Second Recirculated Sections of the Final REIR for Fanita Ranch
Date: Monday, April 7, 2025 3:48:44 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: dkramer22@cox.net <dkramer22@cox.net>
Sent: Monday, April 7, 2025 2:42 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Wendy Stratton <wstratton@CityofSanteeCa.gov>
Subject: Comments IRT Second Recirculated Sections of the Final REIR for Fanita Ranch

Greetings,

I78-1 I urge the Santee City Council to vote against approval of the Fanita Ranch Housing development. Approving residential development solely within a Very High Fire Hazard Severity Zone with very limited emergency egress is irresponsible and reckless. It would put the new residents, and the residents of existing surrounding neighborhoods at increased risk in event that large scale evacuations become necessary to escape an approaching wind driven wild fire.

The City Councils continuous attempts to circumvent court rulings and block a citizen vote on the development give the appearance that the City is working exclusively on behalf of the developer, not for the citizens who elected them, and reflects negatively on the City.

Thank you.

David Kramer
Easthaven Court
Santee, CA 92071
dkramer22@cox.net

I78-1: The comment expresses concern with the placement of the Fanita Ranch Project (proposed project) in a Very High Fire Hazard Severity Zone and evacuation risks. The comment also addresses the court decisions and Santee citizens' vote on the development.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I79: Donna Weiss, April 7, 2025

I79

From: Sandi Sawa
To: Marni Borg
Subject: FW: SCH#200506118
Date: Monday, April 7, 2025 3:58:20 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Donna Weiss <dweiss1946@gmail.com>
Sent: Monday, April 7, 2025 3:50 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: SCH#200506118

I79-1 Dear Director Sawa and Santee City Council, Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters. My concern is the traffic, loss of nature and landscape, and dread of wildfires. Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in ESt County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice. Thank you

I79-1: This comment expresses concerns regarding traffic, loss of nature and landscape, and wildfires. The comment also requests acknowledgment of Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

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Comment Letter I80: Jeff Young, April 7, 2025

I80

From: Sandi Sawa
To: Marni Borg
Subject: FW: SCH #200506118 Fanita Ranch
Date: Monday, April 7, 2025 4:36:21 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Yvonne Young <yvonnejeff@cox.net>
Sent: Monday, April 7, 2025 2:14 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: RE: SCH #200506118 Fanita Ranch

Good Afternoon,
Pushing through the Fanita Ranch project when the voters have already voted against it is ridiculous. You are not listening to the parties that elected you. You have already wasted a lot of money going against your voters. I think this is irresponsible and is going to end up costing all of Santee's residents more money for unnecessary lawsuit's.

I80-1

Respectable

Jeff Young
619-449-5642

I80-1: The comment requests acknowledgment that the voters have already voted against the Fanita Ranch Project (proposed project).

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I81: Mike Aiken, April 8, 2025

I81

From: Mike Aiken
To: Marlene Best; John Minto; Rob McNelis; Ronn Hall; Sandi Sawa; Dustin Trotter; Laura Koval; Carl Schmitz
Subject: Support for Fanita Ranch Project
Date: Tuesday, April 8, 2025 7:41:46 PM

Santee Council and City Staff,

I81-1 I am writing to express my strong support for the Fanita Ranch housing project currently under consideration in Santee. After reviewing the details of the proposal and visiting the project site, I am very impressed with the thoughtful planning and vision that has gone into it. I truly believe this project will be a tremendous asset to our community.

Fanita Ranch will help address Santee's urgent need for new housing, including dedicated components for senior residents—something that is especially important as our population continues to grow and diversify. The plan strikes a meaningful balance between development and open space, while also incorporating vital infrastructure improvements that will benefit the broader community.

This project is being developed by Home Fed Corporation, a company with a strong reputation throughout the region. I have personally visited their past developments in the San Diego area and spoken with residents of those communities. The feedback I've received has been overwhelmingly positive, with many highlighting Home Fed's commitment to quality, long-term value, and thoughtful community design.

Santee deserves a well-executed, future-focused project like Fanita Ranch. I respectfully encourage you to approve this project and help move our city forward in a responsible and inclusive way.

Thank you for your time and consideration.

Sincerely,

Mike Aiken
Director, Carlton Oaks Golf Course

I81-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I82: Russ Barabe, April 8, 2025

I82

From: Sandi Sawa
To: Marni Borg
Subject: FW: second recirculated sections of the final REIR for Fanita Ranch SCH#2000506118
Date: Tuesday, April 8, 2025 6:21:38 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Russell Barabe <russellbarabe@gmail.com>
Sent: Tuesday, April 8, 2025 5:26 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: second recirculated sections of the final REIR for Fanita Ranch SCH#2000506118

Dear Director Sawa and Santee City Council,

I82-1

Please reject current efforts to bypass Santee voters and residents. These people have voted on the zoning of the proposed Fanita Ranch and the courts have upheld this vote.

Now a developer who does not live here, and does not understand what Santa Ana winds are and the damage they can cause is trying to bypass the people of Santee by designating 445 units as senior housing in one of the most dangerous fire hazard zones. The LA fires were a reminder of how fast these fires can move, and a large number of the deaths associated with the LA fires were senior citizens.

Please stand by the original decisions regarding the Fanita Ranch project.

Thank you.

Russ Barabe

I82-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I83: JJ Buksa, April 8, 2025

I83

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch
Date: Tuesday, April 8, 2025 5:01:30 PM

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

-----Original Message-----
From: JJ Buksa <jjbuksa71@gmail.com>
Sent: Tuesday, April 8, 2025 5:00 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch

I83-1 Hi, my name is JJ Buksa. I've been a Santee resident for 54 years. I've seen Santee grow responsibly my whole life. I think Fanita Ranch would bring a lot to our city. We've been waiting for this project to be passed for many years. I support Fanita Ranch.
Sent from my iPhone

I83-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I84: Vicki Call (1), April 8, 2025

I84

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch SCH#200506118
Date: Tuesday, April 8, 2025 10:57:57 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

I84-1

From: vicki call <pennypenze2000@yahoo.com>
Sent: Tuesday, April 8, 2025 10:49 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch SCH#200506118

I84-1: The comment has no text.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

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Comment Letter I85: Vicki Call (2), April 8, 2025

I85

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the
Date: Tuesday, April 8, 2025 10:57:41 AM

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

I85-1

-----Original Message-----
From: vicki call <pennypenze2000@yahoo.com>
Sent: Tuesday, April 8, 2025 10:52 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the

Second Recirculated Sections of the Final REIR for Fanita Ranch SCH#200506118

I85-1: The comment states the name of the Fanita Ranch Project (proposed project) and State Clearinghouse number.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I86: Vicki Call (3), April 8, 2025

I86

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch SCH#200506118
Date: Tuesday, April 8, 2025 12:51:56 PM

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

-----Original Message-----
From: vicki call <pennypenze2000@yahoo.com>
Sent: Tuesday, April 8, 2025 11:51 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch SCH#200506118

April 8, 2025

To: Sandi Sawa AICP, Director of Planning and Building
RE: Why I think it would be a mistake to build Fanita Ranch in fire-prone hills behind the city of Santee

Hello,

I am a 50-year resident of Santee. In 2003, during the Cedar fire, a sheriff knocked on my door and advised me that they were calling for a voluntary evacuation of our neighborhood due to the proximity of the fire. I had the choice to wait to see how things would go, or to take advantage of the notice and gather up more than I would have been able should the fire advance more rapidly than expected. I chose to pack all that I could and go to my mom's. The fire burned all the way to the bottom of the hill at the end of Magnolia Ave. Residents helped to keep it at bay. I was able to return to my home the following day and to provide shelter for my 80-year old aunt and uncle who were living in Crest at the time. They had been evacuated and sent to Valhalla High School, where they stayed for 2 days, until they came to my house. Their house was one of the FEW that survived the Cedar fire in Crest. So I, and those who lived through the Cedar fire in 2003 and the Witchcreek fire of 2007, have first hand experience with the dangers of fire.

I86-1

You, and others who are in the decision-making process, should go to the Weston development across the street from West Hills High School. When you first enter the development, the street is nice and wide. As you go further in, houses are built only on one side of the street, still plenty of room. Keep going and you will find houses on both sides of the street with cars parked on both sides of the street. Two cars cannot pass each other without one pulling over to the side to let the other go by. A dangerous situation in an evacuation setting. I have driven that road all the way back to the end of the complex. IT IS OVER ONE MILE LONG WITH ONLY ONE WAY IN AND ONE WAY OUT. I wouldn't want to live there because of the threat of fire, and the difficulty I would most certainly have getting out. Sometime ago, at a Santee City Council meeting regarding Fanita Ranch, a representative of the fire department said that technology could help in an evacuation situation...section by section of an area could be notified to evacuate. Rob McNellis even disputed that. When people are in a state of panic, it's usually every man for himself.

Have we not learned anything from the disastrous fires of Los Angeles?? Are our memories that short?? All it takes is the right weather conditions and one house that catches fire....that's the start. I don't see how Fanita Ranch would be any different than developments like Weston.

The company that owns Fanita Ranch has spent millions trying to get development going. Should Fanita Ranch be

I86-1: This comment discusses previous wildfires in the City of Santee (City), evacuation during a wildfire, increases in traffic due to the Fanita Ranch Project (proposed project), inadequate infrastructure, and decreased water usage due to the proposed project. The comment also acknowledges prior efforts to get the proposed project on the ballot for a public vote.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

built, approximately 6,000 trips per day would pour onto Magnolia Ave., Cuyamaca St, and Fanita Pkwy. Santee is already heavy with traffic. What would this do to our city? Fanita Ranch residents would use our current infrastructure to go back and forth to their homes. The only street that will be widened is Fanita Pkwy. Not much of a relief. I know we need housing, but it seems homes, apartments and condos are being built in every vacant lot in Santee. Homes that are not affordable, for the most part. Sixty seven (67) homes on Magnolia, across from Walker Preserve, were priced at $1,028,000. Others near Braverman (off Magnolia) started at $750,00 a few years ago. Why is our City Council so determined to get this project though? I don't understand. It seems with all the building in our city, that a share of the property tax dollars would be funneled into the city's budget.

You should also note that several years ago, through a grassroots effort, and with little money, citizens of Santee stood on street corners, in front of grocery stores, near freeway entrances, etc. to let people know we were circulating petitions to put the Fanita Ranch issue on the ballot. Let the people decide whether or not they thought Fanita Ranch was a good idea. Thousands of signatures were gathered from registered voters and the issue was to be placed on the ballot, however, somehow the City Council had it removed. I do not know how it was done, but it was done against the will of the people. Our government is supposed to be for the people, of the people, and by the people, right? Doesn't seem so.

I86-1
cont.

Another issue that was brought up at City Council meetings was utilities. During the Fanita Ranch discussion period, people were asked to cut water usage by 20% due to the drought. How can we build 3,000 homes, if current residents have to cut usage by 20%. Doesn't make sense.

All in all, I have always believed Fanita Ranch would pose a danger to those who would live there should there be a wildfire in the future, and with climate change, the odds are pretty good that Santee will experience wildfires, as we have in the past. The other issue is our infrastructure, which cannot tolerate the additional wear and tear and congestion.

You must consider the quality of life of the people who live here now. Those of us who love our city, who smile when we come down Hwy. 52, or 125 and see our golden hills in the summer and green grass in the spring....a view of Mt. Cuyamaca, El Capital, and our little city nestled in the valley. I have lived here since there were horse stables where Smart and Final are, when Mast Blvd. was a 2-way street with no sidewalks, before there was a bridge over the river on Magnolia Ave. , when Town Center was an open field, etc. I love this town, just so you know.

Regards,

Vicki Call
10164 Peaceful Ct.
Santee, CA 92071
619-627-8332

Comment Letter I87: Rosemary Ciotto, April 8, 2025

I87

From: Rosemary Ciotto
To: Sandi Sawa
Subject: Fanita Ranch
Date: Tuesday, April 8, 2025 7:48:31 PM

Dear Director Sawa and Santee City Council,

I87-1 Why does the City of Santee continue to ignore the.people of Santee's Vote?? Why, who is paying you off? Just like you ignored our vote 3 times for toilet to tap.

I think we need to audit your finances!

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee Voters.

Thank you

Rosemary Ciotto

I87-1: The comment requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

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Comment Letter I88: Chris Cipro, April 8, 2025

I88

From: Sandi Sawa
To: Marni Borg
Subject: Fw: Support for the Fanita Ranch Project
Date: Tuesday, April 8, 2025 6:32:20 PM

From: Chris Cipro <chris@missionrealtygroup.com>
Sent: Tuesday, April 8, 2025 6:09:37 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Support for the Fanita Ranch Project

I88-1

Hello, I hope this message finds you well. As a proud resident of Santee, I am writing to express my strong support for the Fanita Ranch project. I believe that this development is a positive step forward for our community and will bring numerous benefits to Santee.

The project promises to enhance local infrastructure, create job opportunities, and provide much-needed housing options. It will also contribute to the overall growth and vibrancy of our city, making it a more attractive place to live and work.

I am confident that the Fanita Ranch project will serve as an asset to Santee and I wholeheartedly support its development.

Thank you for your time and consideration.

Sincerely,

Chris Cipro
619.519.5119
chris@missionrealtygroup.com
P.S. I'm never too busy for your referrals!

Whenever you're ready, here are four ways I can help you:
1. Follow me on Instagram - https://www.instagram.com/chris.cipro/
2. Sign up for my free website - https://www.chrisciprorealtor.com/
3. Just reply if you'd like to schedule a one on one

I88-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I89: Carl Constantino, April 8, 2025

I89

Sandi Sawa, AICP, Director of Planning & Building **08-April-2025**

cc: Santee City Council

Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Email: ssawa@cityofsanteeca.gov

To Director Sawa, and entire Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. As duly elected representatives of the citizens of Santee, you must reject the new scheme to bypass Santee voters.

Fanita Ranch has been voted down every time by Santee citizens. As the City Council representing the citizens of Santee, it is incumbent upon you to respect the wishes of Santee citizens!

I89-1

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters, and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to Mayor Minto's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice to the citizens, & a disgrace to your office.

Thank you,

Carl Costantino

Santee Citizen since 1981

I89-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I90: Mike Deacon, April 8, 2025

I90

From: Mike D
To: Sandi Sawa
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Tuesday, April 8, 2025 7:29:33 PM

Dear Director Sawa and Santee City Council,

I90-1

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you,

Mike Deacon
Santee Resident

I90-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I91: Linda and George Dochterman, April 8, 2025

I91

From: dox-box2
To: Sandi Sawa
Subject: Final on Fanita Ranch in Santee
Date: Tuesday, April 8, 2025 11:32:36 PM

I91-1 As citizens and registered voters who have resided in Santee for over 2 decades both me and my husband support building the project in Fanita Ranch. Houses should be fire retardant with landscaping to reduce fire risk. All aspects such as the farm are a must for the development. The walking trails need to be established as part of the project while maintaining the wildlife corridors.
We vote yes.
Linda and George Dochterman
9241 Ruffin Rd
Santee Ca

I91-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I92: Mike Helms, April 8, 2025

I92

From: Michael Helms
To: Sandi Sawa
Subject: Fanita Ranch
Date: Tuesday, April 8, 2025 9:07:16 PM

Director Sawa and the Santee City Council,

I92-1 Please respect the voice of the residents of Santee. This is not "your" town, it is our town and the majority has said no to the Fanita Ranch project. Additionally, living on the edge of this proposed sprawl, I have already been cancelled by my hone owners insurance due to high fire risk and it is difficult to find affordable coverage. You already know how bad traffic is both on city streets and Hwy 52. Do the right thing here, restore our faith in the council. No to Fanita Ranch.

Thank You,
Mike Helms
Santee resident

Sent from my iPad

I92-1: The comment expresses concern with insurance due to high fire risk and traffic.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I93: Alison Liebrecht, April 8, 2025

I93

From: Alison Liebrecht
To: John Minto; Sandi Sawa; Ronn Hall; Rob McNelis; Laura Koval; Dustin Trotter
Cc: Clerk
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#2005061118
Date: Tuesday, April 8, 2025 10:10:36 PM

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Council

Via Email

Dear Director Sawa and Honorable Santee City Council,

I93-1

As a resident of District 1, I'm writing to implore you, once again, to please respect the court and Santee voters' right to control zoning of Fanita Ranch for our safety as well as to respect the voters' decision in this matter.

In previous General Public comments discussing the Fanita Development, I urged that we review the lessons learned from the Paradise, CA fires in 2018, with respect to the very limited ingress/egress we have to escape the fires as well as the fire crews' abilities to fight them. I understand that 445 units of "Senior Housing" will be placed in the most elevated fire hazard severity zones of the proposed development. Now pointing to the January 2025 LA fires where nearly all fatalities were senior citizens, the proposed development here would be no different (or worse) because of the number of older Santee residents around the area and not just in the aforementioned senior housing, regardless of the state-of-the-art materials proposed in its construction.

In a time where public trust has been eroded by bait-and-switch tactics, we need to respect residents' concerns and uphold their will by not continuing to promote a rebranded Fanita Housing Development. Without a doubt, we need to shift gears to uncover new ways to bring innovation and opportunity to Santee that will preserve the quality of life the open space in Fanita brings to the community as well as the safety it harbors.

Thank you for your consideration.

I93-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I94: George McMullen, April 8, 2025

I94

From: G. Evan McMullen
To: Sandi Sawa
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Tuesday, April 8, 2025 9:02:50 PM

Dear Director Sawa and the Santee City Council,

I94-1

I speak on behalf of 24 close family members including myself who have resided in Santee as far back as the 1970's.

Personally I have been a resident for 13 years and raised 5 kids here. I have come back into and headed out to work, shopped and took my kids to practice 100,000 times. This is a special place that people are proud of.

It is a shame that those who have sworn to act in the best interest of Santee residents have so clearly and completely disregarded that duty. Santee has voted against this. Not incorrectly. City services are stretched thin, there is serious fire risk, homeless issues, and the streets are exceedingly crowded. It used to take minutes to get to the highway, now 15 minutes just to get on the highway needs to be alotted, and traffic at any time can be heavy.

Having a New York developer whose only concern is making billions from our land beat out out a vote of the people and a mayor who fights against his residents and loses in court is like David beating all odds against Goliath, but then Goliath just resetting and fighting again and again until the bad guy wins. It's a tragedy.

There is a dark history of big decisions made by the Santee government against the will of the people. Reclaimed water, no money spent on fire upgrades (without a tax hike), general inaffectiveness while taxes keep going up. Obviously this decision would be to increase the tax revenue for Santee, but with all the revenue we already have, the problem is not getting more. There is a hole in the bucket so putting more water in won't do anything, though I'm sure it will benefit those pushing this agenda.

Please respect the wishes and court rulings that have already been made and please stop fighting for the big guy to make more money, support your fellow Santee family.

Thank you,

George McMullen

I94-1: This comment requests acknowledgment of the previous public vote and court ruling on the Fanita Ranch Project (proposed project). The comment also mentions inadequate City of Santee services, fire risk, homelessness issues, and traffic.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I95: Nancy Rogers, April 8, 2025

I95

From: Nancy Rogers
To: Sandi Sawa
Subject: Fanita Ranch
Date: Tuesday, April 8, 2025 8:45:28 PM

I95-1 Sent from my iPhone
I am in favor of the development . Sincerely, Nancy Rogers

I95-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I96: Deborah Skinner, April 8, 2025

I96

From: Deborah Skinner
To: Sandi Sawa
Subject: Just say NO Fanita Ranch
Date: Tuesday, April 8, 2025 8:33:52 PM

Dear Director Sawa and Santee City Council,

I am writing to express my sincere concern for the safety and prosperity of the people of Santee. The Fanita Ranch project is UNACCEPTABLE.

Not only will it cause substantial additional risk to current residents in the event of fire, it will perpetuate the horrible traffic patterns and grid lock already faced by current taxpayers. I implore you and the rest of the council members to please continue to respect the court and Santee voters' right to control zoning of Fanita Ranch and reject the new scheme to bypass Santee voters.

I96-1

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone does nothing to protect current residents and would not improve the ability of any resident to be safe in the event of fire. This is an uneducated and reckless proposal especially in the wake of the recent death and destruction during the LA fires. Also designed units for "seniors" is a ploy - a very limited number of seniors will afford such grandiose accommodations. If the goal is truly affordable housing, the cost to purchase should not exceed $150,000 per unit; a reasonable cost for a mass produced efficient 1-2 bedroom stand alone home. We all know this isn't the goal of this disaster of a new plan.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court has followed the law and made decisions based on the law. Remember the courts are objective bodies. Scheming developers are rarely objective especially when it affects THIER bottom line. Rejection of the people and the court is a disservice especially when YOU are voted in by the people of Santee to protect OUR best interests.

I am happy to address my feedback in person, but please consider this a formal rebuke of any proposal to revisit the Fanita Ranch development.

Thank you,
Deborah Skinner

I96-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone and could result in increased traffic. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I97: Jill and Robert Carroll, April 9, 2025

I97

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 10, 2025 8:38:00 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Jill Carroll <jill.carroll82@gmail.com>
Sent: Wednesday, April 9, 2025 10:18 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and the City of Santee,

I97-1 Please respect the Courts and the Santee Citizens Voters rights to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee Voters.
We have lived in Santee almost 43 years and are part of the majority of voters that have voted to stop The Fanita Ranch proposals over the years. Not only is it unsafe but it is not what our community wants. It disgusts, angers and sorrows us that our elected officials ignore what the people and the courts have decided yet they continue to try to get around it for their own benefit.
Please block these tactics and do not allow it to go through.
Sincerely,
Jill and Robert Carroll

I97-1: The comment requests acknowledgment of the Santee voters' right to control zoning over the Fanita Ranch Project (proposed project).

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I98: Barbara Foy, April 9, 2025

I98

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch
Date: Wednesday, April 9, 2025 2:04:30 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Barb Foy <bmaxfoy@gmail.com>
Sent: Wednesday, April 9, 2025 9:09 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch

I98-1 Please stop the advancement of Fanita Ranch with the concept of "Senior Housing." Calling the development by a new name does not make it any safer to wildfire evacuation, nor does it change the impact on the environment. There is a reason so many residents of Santee have been fighting so hard to stop this sprawl of housing. It's a bad idea. It is unsafe. It will have a huge impact on traffic. Most importantly, people will die if there is a fire. That alone should be reason enough to do whatever it takes to stop the project. Santee is not immune to wildfires. My family had to evacuate twice because of fires. They are real, and evacuation routes are not sufficient to handle this proposed development. It is not senior housing. It is developers trying a new tactic to get past the wishes of Santee voters.
Thank you - Barbara Foy

I98-1: This comment raises concern over fire evacuation and traffic as a result of implementation of the Fanita Ranch Project (proposed project).

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I99: Janet Garvin, April 9, 2025

I99

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch
Date: Wednesday, April 9, 2025 6:45:23 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Janet Garvin <jgarvin1950@gmail.com>
Sent: Wednesday, April 9, 2025 5:06 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fwd: Second Recirculated Sections of the Final REIR for Fanita Ranch

---------- Forwarded message ---------
From: **Janet Garvin** <jgarvin1950@gmail.com>
Date: Wed, Apr 9, 2025, 1:35 PM
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch
To: <ssawa@cityfsanteeca.gov>

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Council
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Dear Director Sawa and Santee City Council,

I99-1 As a Santee resident & voter I strongly oppose approval of the Fanita Ranch Project. This project has been pushed forward by the developer , the Mayor & City Council members in spite of opposition by the people of Santee time & time again. The machinations of this council to bypass a legitimate vote of the people is an abuse of power. The fact that they continue to push this project forward is outrageous considering the recent upgrade to severe fire hazard designation. This shows a clear bias toward making money in spite of the danger this project

I99-1: The comment states that the Final Revised Environmental Impact Report (EIR) for the Fanita Ranch Project (proposed project) is inadequate to mitigate the dangers from project implementation. It also expresses concern that the proposed project would place senior housing in an elevated fire hazard severity zone. Additionally, the comment requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised EIR for the proposed project. Therefore, no further response is required.

I99-1 cont.

presents not just in itself but to existing neighborhoods. The Final REIR continues to be inadequate to mitigate the dangers it imposes on the community.
Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters. Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens. Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.
Thank you
Janet Garvin
10338 Settle Rd.
Santee, CA 92071

Comment Letter I100: Brandon Goldberg, April 9, 2025

I100

From: Sandi Sawa
To: Marni Borg
Subject: FW: Support for Fanita Ranch
Date: Wednesday, April 9, 2025 7:09:48 PM
Attachments: Outlook-pmfqilrv.png
image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Brandon Goldberg <brandon@goldstandardmortgage.com>
Sent: Wednesday, April 9, 2025 10:44 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Support for Fanita Ranch

Good morning,

I100-1

I'm writing in support of Fanita Ranch. As a younger family trying to get settled in Santee, we've seen firsthand how hard it is—not just for us, but for so many of our friends—to find a home we can actually afford. That's why we support Fanita Ranch. It gives families like ours a real shot at staying in a city we already love. More homes means more opportunity to put down roots, build a future, and be part of the community long-term.

I know this is a huge life event, there is no such thing as too many questions. Is there anything that I can help with? If you ever feel like we can do something more for you, please let me know.

I100-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I101: Stacie Greene, April 9, 2025

I101

From: Sandi Sawa
To: Marni Borg
Subject: FW: Support for Fanita Ranch
Date: Wednesday, April 9, 2025 3:21:06 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Stacie Greene <stacie@otmadv.com>
Sent: Wednesday, April 9, 2025 2:21 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Support for Fanita Ranch

Good afternoon,

I101-1

As an older senior adult, I am on the lookout for a self-contained community here in San Diego, where I have lived for over 40 years. Looking around, pricing has become so expensive for both rental and purchase. I would like to stay in Sa Diego, but because of the shortage of housing, my choices are very limited. I heard about this upcoming new development and am in favor of building more residents, so I have more choices to live in SD.

I understand the community will have a Senior-friendly design and thus I am in support of the Fanita Ranch development because of its commitment to making Santee livable for residents of all ages. As I get older, it becomes more important to have access to senior accommodating homes, walkable streets, and nearby services. Fanita Ranch is the kind of forward-thinking project that allows older adults to age in place comfortably while staying connected to the community.

Thank you,

Stacie

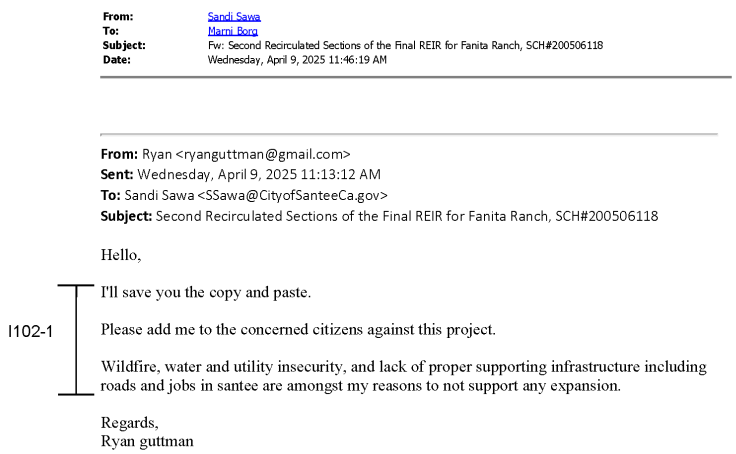
I101-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

Stacie L. Greene
slg7788@gmail.com

Comment Letter I102: Ryan Guttman, April 9, 2025

I102



From: Sandi Sawa
To: Marni Borg
Subject: Fw: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Wednesday, April 9, 2025 11:46:19 AM

From: Ryan <ryanguttman@gmail.com>
Sent: Wednesday, April 9, 2025 11:13:12 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Hello,

I'll save you the copy and paste.

I102-1 Please add me to the concerned citizens against this project.

Wildfire, water and utility insecurity, and lack of proper supporting infrastructure including roads and jobs in santee are amongst my reasons to not support any expansion.

Regards,
Ryan guttman

I102-1: This comment expresses concern with the Fanita Ranch Project (proposed project) due to wildfire, water and utility insecurity, and lack of proper supporting infrastructure, including roads and jobs.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I103: Joni Hendrickson, April 9, 2025

I103

From: Sandi Sawa
To: Marni Borg
Subject: FW: Santee Citizen and registered voter opinion regarding Fanita Ranch Development
Date: Wednesday, April 9, 2025 7:00:37 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: bonjonii <bonjonii@aol.com>
Sent: Wednesday, April 9, 2025 2:36 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Santee Citizen and registered voter opinion regarding Fanita Ranch Development

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Council
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Email: ssawa@cityofsanteeca

Dear Director Sawa and Santee City Council,

If the job of an elected official is to represent the people, then why are the ones in Santee trying to circumvent what we voted against?

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

I103-1 Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East

I103-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I103-1 cont.

County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you
Joni Hendrickson

Sent from my T-Mobile 4G LTE Device

Comment Letter I104: Lynda Marrokal, April 9, 2025

I104

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch
Date: Wednesday, April 9, 2025 6:47:46 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: lynda marrokal <lmarrokal@gmail.com>
Sent: Wednesday, April 9, 2025 6:25 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>; info@laurakoval.com info@laurakoval.com <info@laurakoval.com>
Subject: Fanita Ranch

Dear Mayor and City Council Members,

I104-1 I am writing to you today as a long-time resident of Santee to express my strong support for the Fanita Ranch development project, a vision that was first presented to our community over 35 years ago with the promise of a state-of-the-art, healthy lifestyle community.

The original concept for Fanita Ranch was particularly compelling because it aimed to foster a healthy environment for raising children. It envisioned a diverse range of living conditions, including senior housing, townhouses, single-family homes, and crucially, "move-up" homes that would allow families to stay within Santee as their needs evolved. Sadly, our city currently lacks these vital move-up options, potentially forcing long-time residents to leave the community they cherish.

The inclusion of a working farm within Fanita Ranch was another key element of this healthy lifestyle vision. This farm would have provided an invaluable opportunity to teach our young children about Santee's rich agricultural history. Many of us remember when Santee was a different place, dotted with chicken and dairy farms. The Fanita Ranch farm could help reconnect our children with these roots, fostering an understanding of where our food comes from and promoting a healthy, hands-on learning experience. Furthermore, the potential for this farm to generate some funding for our citizens represents an innovative approach to

I104-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I104-1 cont.

community building.
This project has always represented more than just housing; it was intended to be a cornerstone for community unity. By providing diverse housing options and shared resources like parks and a farm, Fanita Ranch could help us stay together as a community and strengthen the bonds that make Santee a special place to live. Our four founders envisioned Santee as a true place to raise children in safety and beauty, and the original Fanita Ranch plan aligns perfectly with that thoughtful foundation.
It is disheartening to witness the protracted battles this project has faced, often at the hands of environmentalist groups who, in my opinion, have sometimes prioritized obstruction over genuine preservation, even resorting to what some might consider extortionary tactics. It is time we, as a community, focus on our own needs and the long-term benefits that Fanita Ranch can bring. I firmly believe that those who oppose this project are, in fact, hindering Santee's progress and preventing us from realizing a vision that has been promised for decades.
I urge the City Council to fully support the Fanita Ranch development and to work diligently to bring this long-awaited vision to fruition. It is an opportunity to create a thriving, healthy, and unified Santee for ourselves and for generations to come.
Sincerely,
Lynda Marrokal
8643 MARROKAL Lane
Santee, Ca 92071

Comment Letter I105: Suellen Mayberry, April 9, 2025

I105

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 10, 2025 9:04:06 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Sue Mayberry <suemayberry3@gmail.com>
Sent: Wednesday, April 9, 2025 9:54 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Council
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and Santee City Council,

I105-1

Please respect the court and Santee voters' right to control zoning of Fanita Ranch per Measure N rather than attempt to bypass Santee voters as is your duty as public servants.

Designating 445 units as "Senior Housing" in an extreme fire hazard zone is poor planning at a minimum and negligence at the maximum, given the recent deaths and property loss during the fires in Los Angeles. The majority of the deaths from the LA fires were shown to be those of the senior citizen population.

Project approval would demonstrate disrespect for Santee voters and an obvious disregard toward our justice system.

I105-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

Thank you,

Suellen Mayberry

Santee resident

Comment Letter I106: Janet McLees, April 9, 2025

I106

From: Sandi Sawa
To: Marni Borg
Subject: FW: 2nd Recirculation Sections of the final REIR for Fanita Ranch
Date: Thursday, April 10, 2025 8:37:40 AM

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

-----Original Message-----
From: Janet Mc <janetannmc@yahoo.com>
Sent: Wednesday, April 9, 2025 8:52 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: 2nd Recirculation Sections of the final REIR for Fanita Ranch

I106-1 I am writing with concern that the evacuation plan in case of fire is wholly inadequate. The elementary and secondary schools in the area add to the likelihood that chaos would reign and old and new residents would be in increased mortal danger. Insurance premiums have already increased and adding Fanita Ranch to the mix will likely further impact rates. This appears to be an illegal modification of the general plan as this was voted down. Hundreds of Santee citizen signatures and votes showed that the nearly 3000 homes of the proposed Fanita Ranch are against the will of the people.
Sincerely,
Janet A McLees
Santee citizen and voter.

I106-1: The comment states that the evacuation plan for the Fanita Ranch Project (proposed project) is inadequate. The comment also addresses insurance premiums and the Santee citizens' vote against the proposed project.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I107: Paul Morrison, April 9, 2025

I107

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second recirculated sections of final REIR for Fanita Ranch (SCH#2006506118
Date: Wednesday, April 9, 2025 1:58:05 PM

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

-----Original Message-----
From: Paul Morrison <bcampagnolo@me.com>
Sent: Wednesday, April 9, 2025 12:18 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second recirculated sections of final REIR for Fanita Ranch (SCH#2006506118

I107-1

H there. I am a Santee resident and have been for nearly 30 years. I ran for Mayor against Randy Vopel back in the day. I would ask that you consider the will of the voters in Santee in all matters that relate to Fanita Ranch. Please reject any attempts to bypass this issue and allowing the citizens to vote.

Why note build a park with hiking and biking trails that we will all appreciate in years to come. No one wants more traffic on Mast or 52. Open up the other end to Scripps Poway parkway and allow the open space to be available as a buffer to the mad world we all live in.

How much tax revenue are we talking for the project? Will there be a fire station and hospital and Costco and gas station back there?

It would be OK if you only allow access from 67 and Scripps side.

Paul

I107-1: The comment suggests the construction of a park or open space in lieu of the Fanita Ranch Project (proposed project). The comment also addresses traffic on Mast Boulevard and State Route 52 and suggests alternative access to the site from Scripps Poway Parkway or State Route 67. Additionally, it asks if any fire station, hospital, Costco, or gas station would be constructed along with the proposed project and requests acknowledgment of the Santee voters regarding matters pertaining to Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I108: Donna Norris, April 9, 2025

I108

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranchhank
Date: Wednesday, April 9, 2025 8:40:56 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Donna Norris <donnaanorris@yahoo.com>
Sent: Wednesday, April 9, 2025 8:20 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranchhank

Dear Director Sawa and Santee city council

I108-1

The residents of Santee have voted to reject plans to build Fanita Ranch. Please respect their right to control building/zoning . Reject the plan to bypass the Santee Voters.

Do not allow the Fanita Ranch housing plans to continue as they call for "Senior Housing" in a severe fire zone.

Please follow the will of the Santee voters

Thank you,

Donna Norris

I108-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in a severe fire zone. The comment also requests acknowledgement of the Santee voters' right to control building/zoning.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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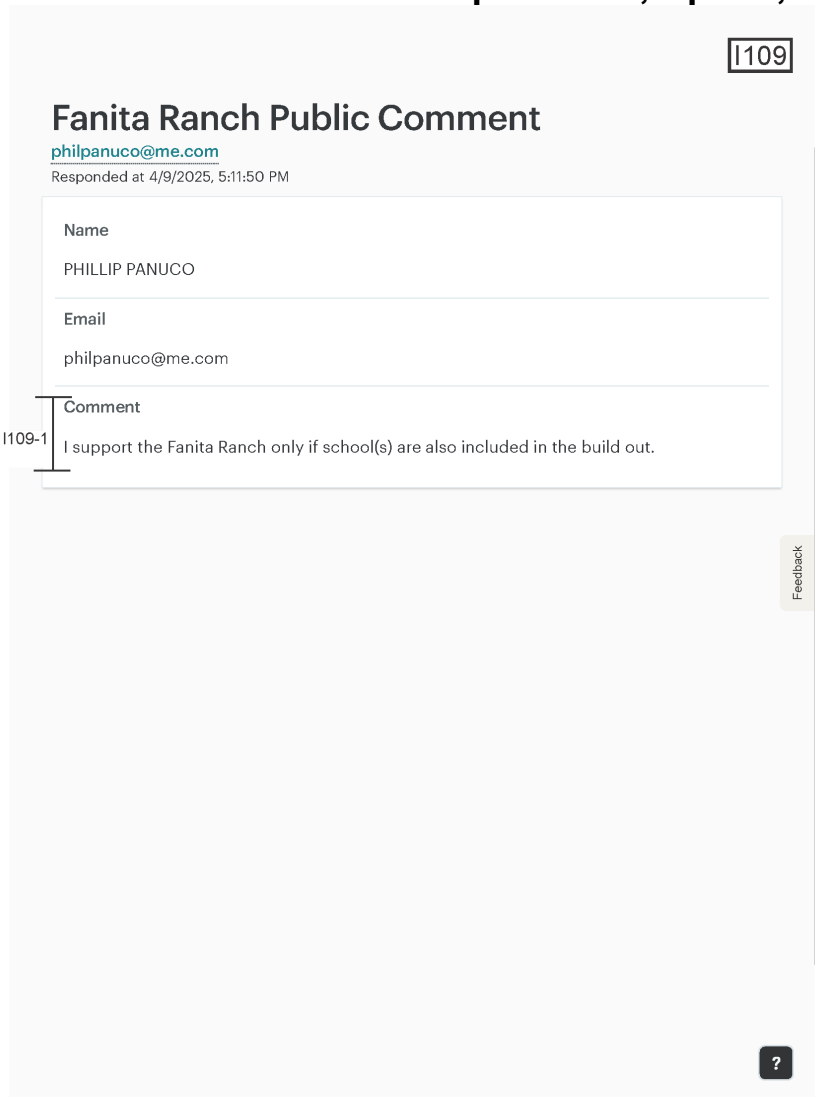
Comment Letter I109: Phillip Panuco, April 9, 2025



I109

Fanita Ranch Public Comment

philpanuco@me.com

Responded at 4/9/2025, 5:11:50 PM

Name

PHILLIP PANUCO

Email

philpanuco@me.com

Comment

I109-1 I support the Fanita Ranch only if school(s) are also included in the build out.

Feedback

?

I109-1: This comment expresses support for the Fanita Ranch Project (proposed project) if schools are included in the buildout.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I110: Michele Perchez, April 9, 2025

I110

From: Sandi Sawa
To: Marni Borg
Subject: FW: second recirculated sections of final EIR Fanita Ranch project (SCH#200506118)
Date: Thursday, April 10, 2025 8:47:28 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: michele perchez <mperchez5@gmail.com>
Sent: Wednesday, April 9, 2025 9:26 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: RE: second recirculated sections of final EIR Fanita Ranch project (SCH#200506118)

Dear Director Sawa and Santee City Council,

Please respect, as public servants, the court's decision and the Santee voters' right to control zoning of Fanita Ranch. Recall that the voters of Santee decisively approved Measure N and as this very large project will have an inordinate impact to our daily lives, voters have earned the right to voice our approval/disapproval for the project.This is the fair thing to do--let the people speak.

I110-1

It is my understanding that 445 units will be earmarked as Senior Housing for this project, a project that will be placed right in the middle of an extreme fire hazard severity zone. Common sense would dictate this site would not even be a consideration given the risk and given the real threat that Santee is sure to experience fires on the scale we have seen with the recent Los Angeles area fires. Knowing that the vast majority of fatalities in those fires were senior citizens, I don't understand why the city planners and council would even contemplate continuing to push forth with this project. Please choose another site for development.

Project approval shows obvious disregard for the will of voters and an ignoring of the court's legal opinion. Contrary to the Mayor's recent comments in East County Magazine, the judge

I110-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of Measure N and the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I110-1 cont. has followed the law and made the right decisions and these should be abided by.

Thank you for taking the time to read my email.

Michele Perchez

Comment Letter I111: Rick Permetti, April 9, 2025

I111

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Wednesday, April 9, 2025 1:55:42 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: rick permetti <permettirick@gmail.com>
Sent: Wednesday, April 9, 2025 9:04 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and Santee City Council,

I111-1

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you

Rick Permetti

I111-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I112: Stephanie Price, April 9, 2025

I112

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch
Date: Thursday, April 10, 2025 9:36:07 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Stephanie Price <postalstephie@yahoo.com>
Sent: Wednesday, April 9, 2025 9:15 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch

Dear Mayor and City Council Members,

I112-1

I'm writing today as a long time resident of Santee to express my strong support for Fanita Ranch.

Santee so desperately needs more affordable and move up housing. And with how they have re-designed it to offer so many option for all different life styles,
it's a shame to have only a few people who want obstruct the development to keep getting in the way of the project.

I urge the City Council to fully support the Fanita Ranch development and to work diligently to bring this project into reality.

I want my kids and grandkids to be able to stay here and not have to find some other place to call home.

Sincerely,
Stephanie Price

I112-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I113: Daniel Rodgers, April 9, 2025

I113

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Wednesday, April 9, 2025 10:27:34 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: dan rodgers <danrodgers5@cox.net>
Sent: Wednesday, April 9, 2025 10:02 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Counsel

Good morning,

I113-1 I just wanted to voice my objection to the obvious end around to get Fanita Ranch built at the displeasure of the voters and taxpayers of Santee.
Our infrastructure is already woefully inadequate for our current number of citizens let alone adding another couple of thousand dwellings.
We are already sitting in traffic for day to day living, we would be trapped if God forbid we had a fire situation like our neighbors in LA.
Please vote to shut this project down and let's improve our infrastructure for those of us who live here now.

Respectfully,

Daniel F. Rodgers

Sent from my iPhone

I113-1: This comment states that the infrastructure is currently inadequate and would not be able to serve the Fanita Ranch Project (proposed project). It also expresses concern related to traffic and fire evacuation.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I114: Debra Rodgers, April 9, 2025

I114

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Wednesday, April 9, 2025 4:41:38 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: deb rodgers <debrodgers@cox.net>
Sent: Wednesday, April 9, 2025 10:36 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Wendy Stratton <wstratton@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Good Morning

I114-1

I wanted to voice my objection to the recommendation to get Fanita Ranch built at the displeasure of the voters and taxpayers of Santee.

Our infrastructure is already inadequate for our current number of citizens, much less adding another several thousand dwellings. By saying that it is primarily for senior housing is just wrong. If we encountered a catastrophic situation like our neighbors to the north of us in LA, Seniors would not be able to get out safely as so many have health issues. Besides that, the rest of the community is already too crowded for the road exit infrastructure in place. We all would be trapped with nowhere to go to exit safely.

Please vote to shut this project down (as the voters have already indicated by voting NO in the past election!) Let's improve our infrastructure for those of us who live here now.

Respectfully,

Debra E. Rodgers

I114-1: The comment states that the area is overcrowded for the current roadway exit infrastructure and expresses concern related to evacuation. The comment also acknowledges the prior public vote pertaining to Fanita Ranch (proposed project).

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

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Comment Letter I115: Nicole Roesler, April 9, 2025

I115

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Wednesday, April 9, 2025 1:57:29 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Nicole M. <nickelassa@gmail.com>
Sent: Wednesday, April 9, 2025 1:22 PM
To: Clerk <clerk@cityofsanteeca.gov>; Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

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

Secured by Check Point

Dear Director Sawa and Santee City Council,

I115-1 As a resident of District 1, I am writing to express my opposition to the proposed Fanita Ranch development in its current form. While I acknowledge the need for additional housing, it is imperative that such developments prioritize the safety and well-being of residents and the broader community. The Fanita Ranch site is situated within a state-designated Very High Fire Hazard Severity Zone. Historically, this area has been susceptible to wildfires, raising significant concerns about the safety of future residents and the potential strain on emergency response resources. The area has burned multiple times, and with climate conditions worsening, the fire danger is only increasing. The proposal to designate 445 units as "Senior Housing" appears to be a strategic move to fast-track the project and bypass a public vote and limit public input on a development of this scale and risk.

I115-1: The comment states that the Fanita Ranch Project (proposed project) is located within a state-designated Very High Fire Hazard Severity Zone, which could strain emergency response resources. In addition, the comment states that the proposed project is located in an already strained transportation corridor (State Route 52), and expresses concern related to daily commutes, emergency response times, and evacuation.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

The Fanita Ranch proposal adds significant pressure to already overburdened infrastructure—particularly State Route 52 (SR-52). This vital freeway is regularly congested during peak hours, and its capacity has not kept pace with the population growth occurring both within Santee and in surrounding jurisdictions. Ongoing development in unincorporated areas of the county, along with continued expansion in neighboring cities like El Cajon and San Diego, continues to increase congestion. Fanita Ranch would introduce thousands of new residents, further clogging an already strained corridor and worsening traffic bottlenecks that affect daily commutes and emergency response times. These regional pressures are compounded by the incomplete connection of Mast Boulevard, a key east-west route originally planned to improve circulation and evacuation access for northern Santee. Evacuation from the area is already dangerously limited in the event of a wildfire, without Fanita Ranch and 7,500-10,000 new residents.

I115-1 cont.

The recent settlement regarding the Otay Ranch Village 13 project offers a pertinent example of how developments in fire-prone areas can be responsibly adjusted to mitigate risks. Originally, that project faced legal challenges due to its location in a wildfire-prone region. The settlement led to several key modifications including a further reduced development footprint, additional enhanced fire safety measures, improved evacuation routes, and developer-funded wildfire surveillance and education. These changes reflect a more balanced approach that takes into account both housing needs and public safety. The Fanita Ranch developer should be required to implement additional comparable measures beyond what is proposed.

While the need for housing is undeniable, it must not come at the expense of resident safety, environmental integrity, or regional infrastructure capacity. Fanita Ranch, in its current form, does not reflect the thoughtful and responsible planning needed in a high-risk area. Santee has made impressive smart progress through infill development projects that add housing within the urban core, close to services, transit, and existing infrastructure without the elevated fire danger and evacuation challenges. That is the model we should continue to support.

If you would provide this email as part of the record for the comment period ending April 10, 2025 for council consideration, I would appreciate it.

Thank you for considering these concerns.

Sincerely,

Nicole Roesler

Comment Letter I116: Rhonda Russell, April 9, 2025

I116

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch
Date: Wednesday, April 9, 2025 7:09:06 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Rhonda Russell <rhonda9754@yahoo.com>
Sent: Wednesday, April 9, 2025 7:06 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch

I116-1 I respectfully reject the second circulation for the Fanita Ranch project bypassing the residents of Santee voters.

The plan was obviously not well thought out especially in light that it would potentially put seniors in harms way with the fires in that area.

Please stand up for us voters/residents of the city of Santee.

Respectfully,
Rhonda Russell,ARM
Associate in Risk Management

Sent from Yahoo Mail for iPhone

I116-1: The comment states that the Fanita Ranch Project (proposed project) would place seniors in a fire area and that the proposed project would bypass voters.

Please refer to Thematic Response 2, Wildfire Risk, and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I117: Reyna Sauza, April 9, 2025

I117

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 10, 2025 9:34:46 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Reyna Sauza <reyna.sauza11@gmail.com>
Sent: Wednesday, April 9, 2025 10:43 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Clerk <clerk@cityofsanteeca.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch via the overwhelmingly popular Measure N in a blatant attempt to bypass Santee voters as stewards of the public will.

I117-1

Designating 445 units as "Senior Housing" squarely within this extreme fire hazard severity zone is poor planning at the minimum, given the recent deaths and property loss during the fires in Los Angeles, knowing that the data shows the vast majority of fatalities in that case were senior citizens.

Project approval shows obvious disrespect for the voters of Santee and disregard toward the judicial branch. Contrary to the Mayor's comments in East County Magazine, the judge has followed the law and made the right decisions. He should know better than to fuel baseless rhetoric.

Thank you,
Reyna Sauza

I117-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I118: Kelie Schallert, April 9, 2025

I118

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch
Date: Wednesday, April 9, 2025 1:46:49 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Schallert, Kelie A CWO-3 USN HSC-85 (USA) <kelie.a.schallert.mil@us.navy.mil>
Sent: Wednesday, April 9, 2025 10:02 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch

Good morning Ms. Sawa,

I am writing in hopes to help preserve Wild Santee. I have lived in Santee since 2009 and have owned 2 houses here. I sold one due to getting stationed in Florida for 3 years, but because I loved Santee so much and what it stood for I bought another house even during the unfortunate peak prices when we got stationed right back here. My family was even considering in retiring here because we love our home and Santee so much. We are definitely reconsidering if this development goes through.

I118-1

Where Santee stands now, we have everything here. That's what people love about it. There is a couple nice town centers already, tons of wildlife, events, clean streets, minimal traffic, minimal crime, beautiful outdoors, views, quiet, and I can go on and on. Allowing another huge development is only going to diminish what Santee is known for. It is going to become overpopulated, noisy, more pollution, less wildlife, less natural views, increase crime, traffic, trash, and also noise.

The families that have been here since they were young are still in a lot of the homes and have passed them down to their children. Specifically on Strathmore Dr. which is where we live. We are on the side of the Santee lakes and have moved here because its quiet and zero backyard noise. To sit after a long hard day and enjoy the peace and quiet and the beautiful views without people honking or driving by, or breathing in car fumes, or worrying about our kids getting out the gate and getting hit by a car. This is also what we paid for when we all bought these houses. Then and now.

I118-1: This comment states that large developments would create more noise, pollution, crime, traffic, and trash and less wildlife and natural views.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the Fanita Ranch Project. Therefore, no further response is required.

I118-1 cont.

We enjoy watching the bicyclists and the wild, not automobiles.

I truly hope you please take into consideration all of our concerns and opinions. This city is everything to us and Fanita Ranch is not the answer.

Thank you for your time.

Very Respectfully,

Kelie Schallert

Comment Letter I119: Evelyn Schwarz, April 9, 2025

I119

From: Sandi Sawa
To: Marni Borg
Subject: FW: Comments for Fanita Ranch REIR SCH #200506118
Date: Thursday, April 10, 2025 8:46:19 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: lasses <lasses@cox.net>
Sent: Wednesday, April 9, 2025 8:29 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Comments for Fanita Ranch REIR SCH #200506118

Director Sawa and Santee city Council,

I119-1

I acknowledge the urgent need for affordable housing, senior housing, and general housing development within our state/community. However, Santee has unfortunately been plagued by subpar developments. The Weston development, originally within the jurisdiction of the City of San Diego was approved and developed with minimal input from Santee residents, and exemplifies this issue. The developer benefited from the designation of affordable housing which allows them to cut development corners and then the City of San Diego relocated that affordable housing out of our impacted community (Santee) and relocated it to Otay, resulting in a development that poses significant risks in an emergency.

The Fanita Ranch project lacks adequate transportation circulation, particularly in emergency situations. To mitigate these concerns, there should be increased access points to alleviate transportation impacts and facilitate emergency evacuations, such as from fires. The planned access to and from the development

I119-1: The comment states that the Fanita Ranch Project (proposed project) lacks adequate transportation circulation, particularly in emergency situations such as fires.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims, and Thematic Response 2, Wildfire Risk. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I119-1 cont.

will significantly impact tranquil neighborhoods and resources such as Santee Lakes that currently serve as the outskirts of Santee. There will be significant secondary "trips" from delivery agencies such as Amazon, UPS, trash trucks, etc. These impacts cannot be easily mitigated or dismissed.

Please just ask yourself this "have we learned nothing" from the devastating fires that have plagued California in particular? Please don't give into the shortcuts. Make this a community improvement that demonstrates exemplary thoughtful planning.

Respectfully,

Evelyn Schwarz
Santee Resident (1990)

Sent from Yahoo Mail for iPad

Comment Letter I120: Lori Scribner, April 9, 2025

I120

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 10, 2025 8:47:53 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Lori Scribner <lori@scribnercomm.com>
Sent: Wednesday, April 9, 2025 9:38 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and Santee City Council,

I120-1

I am beyond shocked that the Mayor of Santee and the City Council refuse to respect the court and Santee voters' right to control zoning of Fanita Ranch. Voters have rejected the Fanita Ranch development and I'm asking you to both respect democracy and our vote by rejecting the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice, and frankly, unAmerican.

Thank you,
Lori Scribner

I120-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I121: Jasen Torbett, April 9, 2025

I121

From: Sandi Sawa
To: Marni Borg
Subject: FW: Support for Fanita Ranch
Date: Wednesday, April 9, 2025 2:15:46 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Jasen Torbet <jasape@att.net>
Sent: Wednesday, April 9, 2025 2:13 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Support for Fanita Ranch

Hello,

I121-1 As longtime residents of Santee, we support the Fanita Ranch project because it gives families like ours the chance to grow without leaving the community we love. For those who have outgrown their homes or want to downsize, Fanita Ranch will offer new housing options right here in Santee. As a local that has already moved-up and sold my older smaller Santee home, it created opportunities for younger families to enter the housing market in Santee. I support much needed housing and want to see more Santee housing!

Jasen Torbett
7751 Britt Place
Santee Ca 92071

I121-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I122: Dean Velasco, April 9, 2025

I122

From: Sandi Sawa
To: Marni Borg
Subject: FW: Full Support for the Fanita Ranch Project
Date: Wednesday, April 9, 2025 7:50:26 AM
Attachments: image001.png
image002.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Dean Velasco <deano@deanospub.com>
Sent: Wednesday, April 9, 2025 7:01 AM
To: Marlene Best <mbest@CityofSanteeCa.gov>; John Minto <JMinto@CityofSanteeCa.gov>; Rob McNelis <RMcNelis@CityofSanteeCa.gov>; Ronn Hall <RonnHall@CityofSanteeCa.gov>; Sandi Sawa <SSawa@CityofSanteeCa.gov>; Dustin Trotter <DTrotter@CityofSanteeCa.gov>; Laura Koval <LKoval@CityofSanteeCa.gov>; Carl Schmitz <CSchmitz@CityofSanteeCa.gov>
Cc: Dean Velasco <deano@deanospub.com>
Subject: Full Support for the Fanita Ranch Project

Santee City Council and City Staff,

I'm writing to express my strong support for the proposed Fanita Ranch housing project here in Santee. As both a longtime resident and the owner of Deano's Pub, I care deeply about the future of our community—both for those of us who live here now and for the new families and individuals who want to call Santee home.

I122-1

Our city is growing, and we need smart, responsible development to meet that demand. Fanita Ranch offers just that. It addresses Santee's urgent need for new housing—including options for seniors—while also preserving open space and bringing in meaningful infrastructure improvements that benefit the entire city.

I've looked into HomeFed Corporation, and I'm impressed by their reputation and past projects in the San Diego area. They're known for quality work, thoughtful planning, and long-term commitment to the communities they build. That's the kind of partner we want helping shape the future of Santee.

I122-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I122-1 cont.

As a local business owner, I also recognize how important it is to support projects that bring responsible growth. New residents mean new customers, more vitality, and stronger support for small businesses like mine.

Santee deserves this kind of forward-thinking development. I encourage you to approve the Fanita Ranch project and help move our city ahead in a balanced, inclusive way.
Thank you for your time and service to our community.

Sincerely,
Dean Velasco
Santee Resident & Owner, Deano's Pub

Dean Velasco, CEO
We Are Chaos
DBA - Deano's Pub
619-890-8462
http://www.deanospub.com

Comment Letter I123: John Williams, April 9, 2025

I123

From: Sandi Sawa
To: Marni Borg
Subject: FW: Support for Fanita Ranch
Date: Wednesday, April 9, 2025 4:17:23 PM
Attachments: f68fa968.jpeg
image001.png
Importance: High

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: John Williams <john@otmadv.com>
Sent: Wednesday, April 9, 2025 4:10 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Support for Fanita Ranch
Importance: High

Good afternoon,

I123-1

As a young professional building my career, one of the biggest hurdles I've faced has been finding affordable and suitable housing in Santee. Despite working in the city and being deeply invested in the local community, it's been difficult to find a place that aligns with both my financial situation and the kind of lifestyle I envision—safe, connected, and close to work. Many of my peers are in the same position, wanting to stay and grow in the place where we work, volunteer, and support local businesses.

That's why Fanita Ranch gives me a sense of hope. It represents the possibility of creating real opportunities for people like me—young professionals, first-time homebuyers, and local workers—to actually live in the community we're already contributing to every day. With thoughtful planning and a focus on accessible housing, Fanita Ranch could be a step toward a more balanced and inclusive Santee, where people don't have to choose between affordable housing and the city they love.

Best,

John Williams
Project Development & Business Growth Manager
Over the Moon Sales & Advertising
Sales, Advertising, Digital Technology, and Signage

I123-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I124: Daniel M. Bickford, April 10, 2025

I124

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch EIR
Date: Thursday, April 10, 2025 12:34:25 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Daniel Bickford <dmbickford@yahoo.com>
Sent: Thursday, April 10, 2025 12:01 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch EIR

I124-1

I appreciate your time and energies in working this much needed project.

Housing is in short supply not only in Santee but in the entire state.

Fanita Ranch is needed to fill that shortage for work force and senior living in Santee.

I plead that the City Council concentrate their approval of the EIR at hand and not the chatter from people about matters that have already been decided.

Thank you,

Daniel M. Bickford
619-375-7692
dmbickford@yahoo.com

I124-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I125: Raymond Marrokal Boffman, April 10, 2025

I125

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita ranch
Date: Thursday, April 10, 2025 9:33:54 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Harry Boffman <hboffmanmd@gmail.com>
Sent: Thursday, April 10, 2025 9:20 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita ranch

I125-1 I'm in.
Favor of Fanita ranch I have been born and raised in Santee I'm 28 years old now and look forward to this project
Raymond Marrokal Boffman
8643 Marrokal Ln, Santee, CA 92071

I125-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I126: Lennea Brown, April 10, 2025

I126

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 10, 2025 5:50:17 PM
Attachments: image001.png

Late comment received.

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Lennea Brown <lennea11@gmail.com>
Sent: Thursday, April 10, 2025 5:49 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Sandi Sawa, AICP, Director of Planning and Building

Cc: Santee City Council

Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Email: ssawa@cityofsanteeca.gov

Dear Director Sawa and Santee City Council,

I126-1

Designating 445 units in the Fanita Ranch project as Senior Housing to circumvent the court decision and Santee voters' right to control zoning of Fanita Ranch is a disservice to the court and to Santee voters. Fanita Ranch is located in an elevated fire hazard severity zone, and the placement of senior housing in this zone is unconscionable given the recent death and destruction of the LA fires where nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the courts should be off limits. Contrary to the Mayor's baseless assertion in East County Magazine, the judge followed the law and made the right decisions. Rejection of the people and the court is an affront.

Thank you,

Lennea Brown

Santee Resident

I126-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also states that circumventing the court and the Santee voters' right to control zoning is a disservice.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I127: Angela DiDio, April 10, 2025

I127

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch
Date: Thursday, April 10, 2025 10:31:23 AM
Attachments: image001.jpg
image002.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: angela didioandassoc.com <angela@didioandassoc.com>
Sent: Thursday, April 10, 2025 10:28 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch

I127-1

I am in support of the Fanita Ranch project –

I have followed this project for literally decades and it appears that the newest submittals strike a balance that should be recognized and supported for:

1. Valuing the environment while still addressing Santee's real housing needs and creating significant open space - integrating trails and natural areas into its design.

2. It's incorporation of smart growth (by forward thinking planning), valuing community input, and making investments that matter (enhancing livability)

3. The project is thoughtfully planned and not the typical urban sprawl

4. It would represent a well-integrated addition to Santee that helps meet real housing needs with care.

Thank you
Angela DIDio

Angela DiDio
2738 Madison Street
Carlsbad, CA 92008
619-540-8074 cell
760-434-0094 office
www.Didioandassoc.com

I127-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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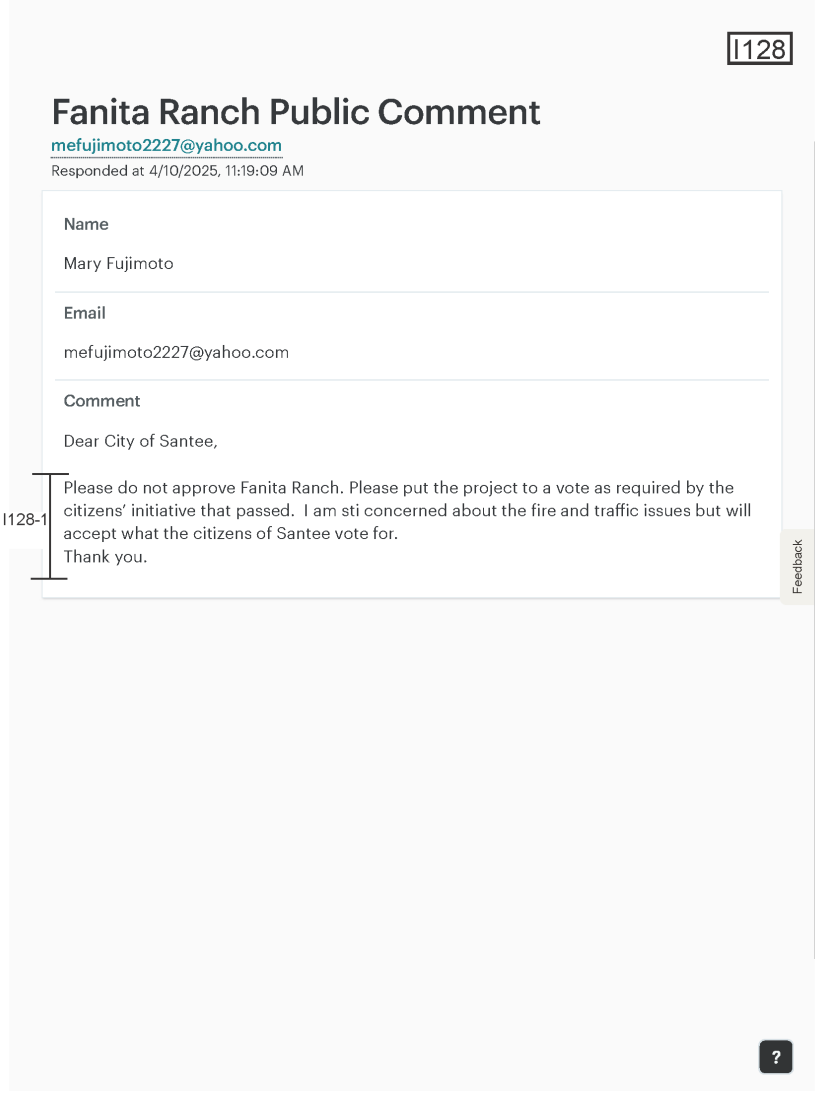
Comment Letter I128: Mary Fujimoto, April 10, 2025



I128

Fanita Ranch Public Comment

mefujimoto2227@yahoo.com

Responded at 4/10/2025, 11:19:09 AM

Name

Mary Fujimoto

Email

mefujimoto2227@yahoo.com

Comment

Dear City of Santee,

I128-1 Please do not approve Fanita Ranch. Please put the project to a vote as required by the citizens' initiative that passed. I am sti concerned about the fire and traffic issues but will accept what the citizens of Santee vote for.
Thank you.

Feedback

?

I128-1: This comment expresses concern for traffic and fire issues related to the implementation of the Fanita Ranch Project (proposed project) and requests that the proposed project be put to a vote.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I129: David Hill, April 10, 2025

I129

From: Sandi Sawa
To: Marni Borg
Subject: FW: In Support of Fanita Ranch Development
Date: Thursday, April 10, 2025 2:53:57 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: David Hill <DHill1@brwncald.com>
Sent: Thursday, April 10, 2025 1:42 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: In Support of Fanita Ranch Development

I129-1 I am writing in support of the Fanita Ranch Development. I am 63 and a renter. I am hoping to purchase a home in the next few years. I would be proud to live in the City of Santee. If nothing else I am hoping that the additional development will result in low housing prices.

Thanks

David Hill
451 A Street
Suite 1500
San Diego CA 92101

I129-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I130: Heather Murray, April 10, 2025

I130

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 10, 2025 9:35:52 AM

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

-----Original Message-----
From: heather murray <heather_mu@yahoo.com>
Sent: Thursday, April 10, 2025 6:50 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Santee City Council,

I130-1 I have been a resident and homeowner in Santee for over 20years. In that time I have seen the Fanita Ranch project come up several times and each time the citizens of Santee have made it clear this is not a project we want built. Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.
Designating 445 units as "senior housing" within this elevated fire zone is unconscionable. Especially in the wake of the recent devastating LA fires.
Project approval schemes that demonstrate contempt for voters should be off limits. The court and the people of Santee have clearly made their wishes on this matter. Santee City council needs to listen to its citizens, rejection of the people and the court is a disservice.

Thank You,
Heather Murray
Sent from my iPhone

I130-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. The comment also requests acknowledgement of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I131: Trevor Myers, April 10, 2025

I131

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch
Date: Thursday, April 10, 2025 11:57:45 AM
Attachments: image001.png
image002.jpg
image003.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Trevor Myers <myers@geoconinc.com>
Sent: Thursday, April 10, 2025 10:37 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch

Hello,

I131-1 I am a Santee resident and support the Fanita Ranch project. This proposed development has been carefully planned over the last 40 years or so to satisfy everyone's needs, except the no growth people that will never support any development. This project brings much needs revenue to the City of Santee to continue providing services, brings infrastructure improvements for all of Santee to enjoy, and provides much needed housing.

Please vote in favor of this project.

Please contact me if you have questions. Thank you.

Trevor Myers, RCE
Senior Engineer
O: 858.558.6900
M: 619.818.4376
myers@geoconinc.com
GEOCON INCORPORATED

I131-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I132: John and Gina Olsen, April 10, 2025

I132

From: Sandi Sawa
To: Marni Borg
Subject: FW: Support for the Fanita Ranch Project
Date: Friday, April 11, 2025 6:59:48 AM

Late comment

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

-----Original Message-----
From: john olsen <johnolsen.santee@gmail.com>
Sent: Thursday, April 10, 2025 7:29 PM
To: John Minto <JMinto@CityofSanteeCa.gov>; Dustin Trotter <DTrotter@CityofSanteeCa.gov>; Rob McNelis <RMcNelis@CityofSanteeCa.gov>; Laura Koval <LKoval@CityofSanteeCa.gov>; Ronn Hall <RonnHall@CityofSanteeCa.gov>
Cc: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Re: Support for the Fanita Ranch Project

Good Evening Council,
We just emailed this to the City Planner Sandi Sawa, and forgot to include you all.

Have a great evening,
John and Gina Olsen

> On Apr 10, 2025, at 7:15 PM, john olsen <johnolsen.santee@gmail.com> wrote:
>
>
> Good Evening Sandi,
>
> My family moved to Santee in 1969 when the Magnolia Terrace development was just getting started. We've done our part to help Santee grow from a two stop sign town to a wonderful little city that is the envy of our neighboring communities.
>
I132-1 > My family supports moving forward with the development of the Fanita Ranch Project so the next generation of families looking for safe and affordable housing can call Santee home.
>
> Please reach out to me if you have any questions about our position on this issue or if I can volunteer on behalf of the project.
>
> Warm Regards,
>
> John and Gina Olsen
> 619 855-1151
>

I132-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I133: Pamela Porteous-Hunt, April 10, 2025

I133

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch
Date: Friday, April 11, 2025 7:00:16 AM
Attachments: image001.png

Late comment

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: PAM HUNT <pamhunt953@gmail.com>
Sent: Thursday, April 10, 2025 6:53 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch

I133-1 We do NOT support the continued building in Fanita Ranch. Voters already voted.

Pamela Porteous-Hunt
Santee, CA

I133-1: This comment expresses opposition to the Fanita Ranch Project (proposed project) and that voters already voted.

Please refer to Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I134: Michael Ranson and Maria De La Cruz, April 10, 2025

I134

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 10, 2025 9:02:12 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Michael Ranson <michaellranson@gmail.com>
Sent: Thursday, April 10, 2025 8:58 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: John Minto <JMinto@CityofSanteeCa.gov>; Laura Koval <LKoval@CityofSanteeCa.gov>; Ronn Hall <RonnHall@CityofSanteeCa.gov>; Dustin Trotter <DTrotter@CityofSanteeCa.gov>; Rob McNelis <RMcNelis@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Council
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Email: ssawa@cityofsanteeca.gov

Dear Director Sawa and Santee City Council,

I134-1 Thank you for continuing the work on behalf of our City and the Developer of Fanita Ranch to diligently oversee the approval process. My wife and I moved to Santee just over 10 years ago and we were excited to learn about the potential of this project. In fact, our home is on Strathmore Drive and the back of the home overlooks Fanita Pkwy and faces Santee Lakes. We purchased the home with an understanding of what has been an important part of the Santee General Plan for decades. We have just lived through the AWP construction (not fun) and understand the changes planned for Fanita Pkwy and how it will directly impact us.

I134-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I134-1 cont.

We support the Fanita Ranch project and look forward to it getting through the appropriate approval processes and becoming an asset to our community.

After moving here, I learned of a small group of opponents to this version, and all previous versions, of Fanita Ranch. They would likely oppose any version that does not preserve 100% of this property. I have learned how one resident with the legal power of a nationwide environmental organization with conservation efforts all over the globe can delay and obstruct the rights of many private landowners right here in our own small city. I have learned that CEQA abuse is real and it often thrives here in Santee. This can be discouraging to all of us who see the potential of this project and others. Particularly when opponents consistently scream accusations of corruption, have the support of an East County online magazine that masquerades as a local media outlet and have now even likened the approval of Fanita Ranch akin to murder because there might be a fire on the property one day in the future.

Please do not be deterred by the few who will never see the potential of what Fanita Ranch will do for the City of Santee and our region. Please continue the work, review the facts and then vote according to where the codes and the law leads you. We believe they will lead you to voting to approve Fanita Ranch when the project is before you once again.

Sincerely,
Michael Ranson and Maria De La Cruz
619.977.1121

Comment Letter I135: Sylvia Rose, April 10, 2025

I135

From: Sandi Sawa
To: Marni Borg
Subject: FW: Support for Fanita Ranch Community Development
Date: Thursday, April 10, 2025 12:35:32 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Sylvia Rose <sylviarhomes@gmail.com>
Sent: Thursday, April 10, 2025 12:12 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Support for Fanita Ranch Community Development

Dear Ms Sawa:

I135-1 My name is Sylvia Rose, and I am a native San Diegan. I have worked in new home sales for many years, and in the case of Fanita Ranch, I have witnessed several attempts to entitle and develop this neighborhood. I've always believed this project holds incredible promise for the community of Santee. Now, with a thoughtfully designed plan that reflects the needs of both current and future residents, there is a real opportunity to finally bring this vision to life.
Santee's existing housing stock is limited, and buyers have few options when they're looking to move up, downsize, or settle here for the first time. Fanita Ranch fills that gap in a meaningful way—offering new homes for families who love this city and want to stay, while also welcoming new residents who will contribute to the local economy and help the community continue to thrive. This community also offers a place for older residents, looking to downsize from their current homes, but to remain in Santee.

I fully support this project and believe it's what Santee needs to grow with purpose and prosperity. I hope you will agree. Thank you.

--
Sincerely,
-Sylvia Rose
DRE #10377761
San Diego Sales & Marketing Council President 2025

I135-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I136: J. Sale, April 10, 2025

I136

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 10, 2025 12:40:13 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: ilovechaos <ilovechaos@protonmail.com>
Sent: Thursday, April 10, 2025 12:24 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Wendy Stratton <wstratton@CityofSanteeCa.gov>; Rob McNelis <RMcNelis@CityofSanteeCa.gov>; John Minto <JMinto@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and Santee City Council,

I136-1

I have been a resident and homeowner in Santee for 27 years. I love Santee. It is located in one of the prettiest river valleys on the planet, as you know. It is also at incredibly high risk of wildfires, as you must also know.

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you for your kind consideration in this regard,

J. Sale

I136-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I137: Stanley L. Streit, April 10, 2025

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Thursday, April 10, 2025 9:34:22 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Stanley L. Streit <stanstreit@gmail.com>
Sent: Thursday, April 10, 2025 8:39 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Cc: Clerk <clerk@cityofsanteeca.gov>; streitgarrett@gmail.com; Katelyn Streit <kstreit@funbike.com>; Ronn Hall <RonnHall@CityofSanteeCa.gov>; Dustin Trotter <DTrotter@CityofSanteeCa.gov>; Laura Koval <LKoval@CityofSanteeCa.gov>; John Minto <JMinto@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and Santee City Council,

I137-1

Having moved to Santee in 1963, it's disappointing and sad to see what has happened to my hometown. To think for a minute this is a good idea clearly shows two things. 1) The Mayor does not care about the Santee residents and the quality of life that is being destroyed by the overdevelopment of Santee, and 2) this decision is absolutely tax revenue driven. This proposed development has been feared by the longtimers since it was introduced some time back. This is sacred ground to those of us who grew up here. Santee and Poway will soon be connected as one giant city if this goes through.

Playing on words like "senior housing" is just a developer (and a developer out of New York no-less) and lawyer game to get people to believe this is something other than urban sprawl and destruction of the natural habitat that is Sycamore Canyon. They don't care about anyone but themselves and their shareholders. How does the Mayor not accept that as the fact it is?

I137

I137-1: The comment states that the Fanita Ranch Project (proposed project) would contribute to more cars and congestion in the community and place senior housing in an elevated fire hazard severity zone. It also addresses an evacuation concern should there be a fire in Sycamore Canyon and requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I137-1 cont.

3,000 more houses means 6,000 more cars, minimum. Have you driven through Santee lately? It's like driving down Mira Mesa Blvd. Isn't it quite obvious that we're full? Have you driven (or rather tried to) through the development across from West Hills High School behind The Lakes? How did that nightmare ever happen? That was supposed to be a protected area, too. What happened? Developer money and tax revenue is what happened. If there is another fire in Sycamore Canyon (and there will be), there is no way to get out of the Canyon. Just like the LA fires.

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

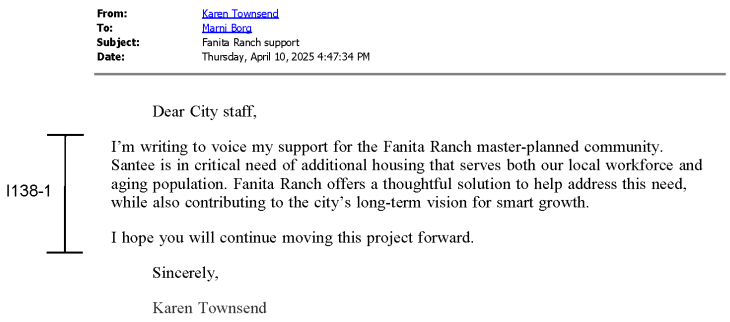
Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes demonstrate contempt for voters and statements which malign the court should be off limits, The court is not afraid of the "environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions.
Rejection of the people and the court is a disservice.

Thank You,

Stanley L. Streit
// SS
[?]

Comment Letter I138: Karen Townsend, April 10, 2025



From: Karen Townsend
To: Marni Borg
Subject: Fanita Ranch support
Date: Thursday, April 10, 2025 4:47:34 PM

Dear City staff,

I138-1

I'm writing to voice my support for the Fanita Ranch master-planned community. Santee is in critical need of additional housing that serves both our local workforce and aging population. Fanita Ranch offers a thoughtful solution to help address this need, while also contributing to the city's long-term vision for smart growth.

I hope you will continue moving this project forward.

Sincerely,

Karen Townsend

I138

I138-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I139: Katharine Turkle, April 10, 2025

I139

From: Sandi Sawa
To: Marni Borg
Subject: FW: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Date: Friday, April 11, 2025 7:00:30 AM
Attachments: image001.png

Late comment

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Katharine Turkle <katharine.turkle@gmail.com>
Sent: Thursday, April 10, 2025 6:34 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118

Dear Director Sawa and Santee City Council,

I139-1

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you, Katharine Turkle

I139-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I140: Nichole Weinman, April 10, 2025

From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch Support
Date: Thursday, April 10, 2025 9:02:27 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Nichole Weinman <NWeinman@jaamelectric.com>
Sent: Thursday, April 10, 2025 6:54 AM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch Support

Hi,

I140-1 My name is Nichole Weinman and I am the president JAAM Electric. We are a local Santee business with over 120 employees. Unfortunately, the majority of my employees cannot live in the city they work in. They absolutely want to live in Santee, but the opportunity just does not exist. Santee needs all levels of housing from entry level, move up and even luxury. Fanita Ranch adds housing at every level. Please support local businesses and employees by supporting Fanita Ranch.

Nichole Weinman
JAAM Electric & Low Voltage
President
9260 Isaac St, Suite D
Santee, CA 92071
Cell: 619-342-5888
www.jaamelectric.com

I140

I140-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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Comment Letter I141: Chris Worthen, April 10, 2025

From: Sandi Sawa
To: Marni Borg
Subject: FW: In Support of Fanita Ranch
Date: Thursday, April 10, 2025 3:21:00 PM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office from 4/10-4/20/25.

From: Chris Worthen <cgcgarvin@gmail.com>
Sent: Thursday, April 10, 2025 12:57 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: In Support of Fanita Ranch

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

Secured by Check Point

Good Afternoon,

I141-1 As a younger family trying to find our footing in Santee, we support Fanita Ranch because it opens the door to homeownership in a city we already love. With more housing options, we—and others like us—can afford to stay, grow roots, and contribute to the local community. This would give us the opportunity to stay closer to our families already living in the area and allow our bonds to only grow stronger and not fade away.

- The Worthens

I141

I141-1: This comment expresses support for the Fanita Ranch Project (proposed project).

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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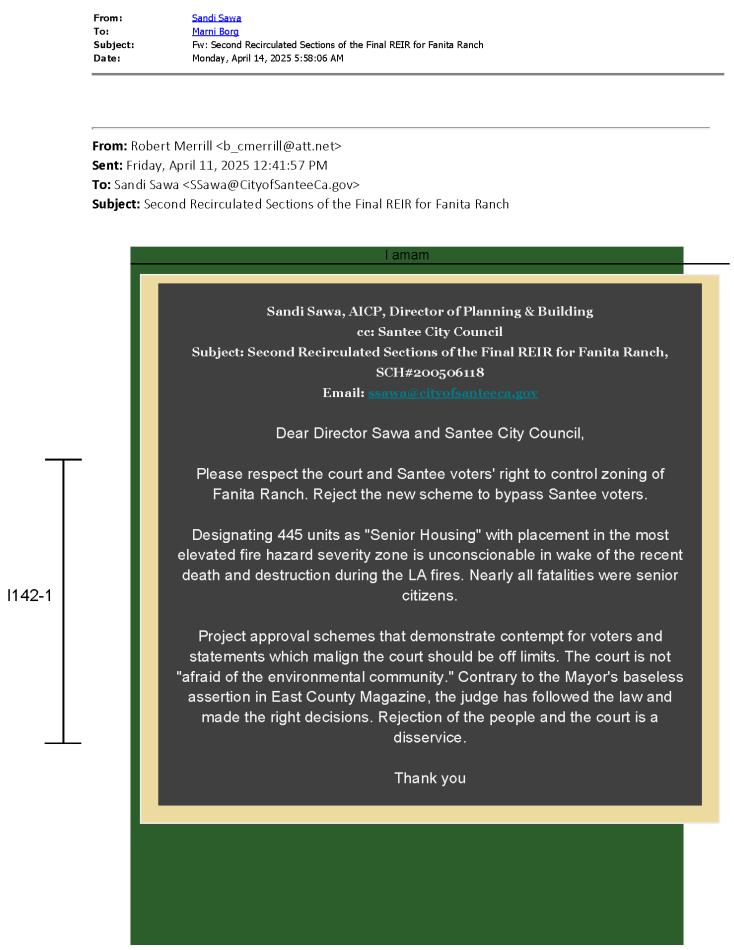
Comment Letter I142: Robert Merrill, April 11, 2025



From: Sandi Sawa
To: Marni Borg
Subject: Fw: Second Recirculated Sections of the Final REIR for Fanita Ranch
Date: Monday, April 14, 2025 5:58:06 AM

From: Robert Merrill <b_cmerrill@att.net>
Sent: Friday, April 11, 2025 12:41:57 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch

I amam

Sandi Sawa, AICP, Director of Planning & Building
cc: Santee City Council
Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch, SCH#200506118
Email: ssawa@cityofsanteeca.gov

Dear Director Sawa and Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you

I142-1

I142

I142-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgment of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

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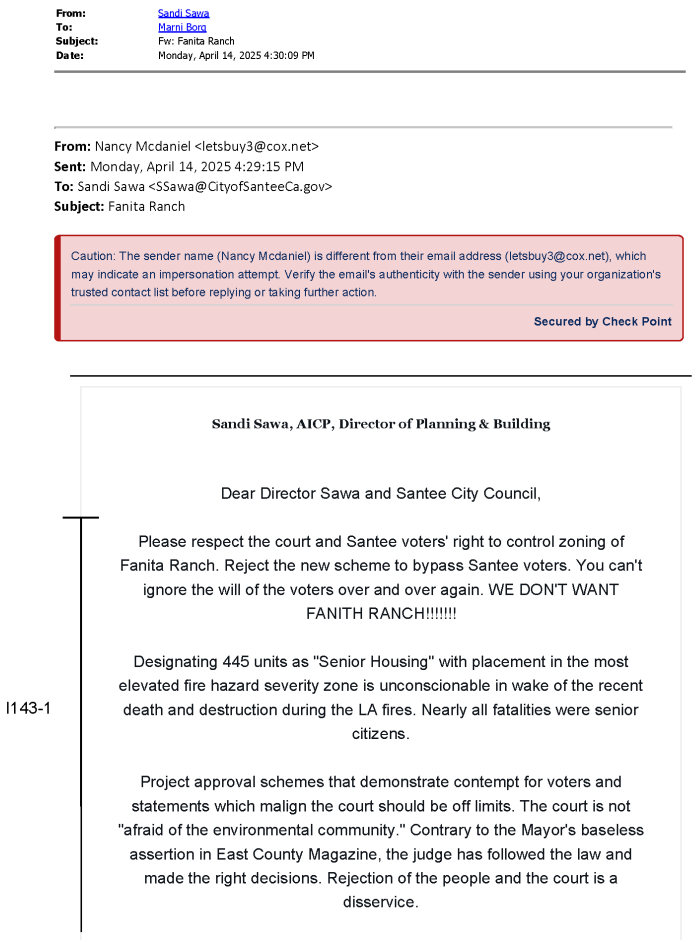
Comment Letter I143: Nancy McDaniel, April 14, 2025

I143



From: Sandi Sawa
To: Marni Borg
Subject: Fw: Fanita Ranch
Date: Monday, April 14, 2025 4:30:09 PM

From: Nancy Mcdaniel <letsbuy3@cox.net>
Sent: Monday, April 14, 2025 4:29:15 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch

Caution: The sender name (Nancy Mcdaniel) is different from their email address (letsbuy3@cox.net), which may indicate an impersonation attempt. Verify the email's authenticity with the sender using your organization's trusted contact list before replying or taking further action.

Secured by Check Point

Sandi Sawa, AICP, Director of Planning & Building

Dear Director Sawa and Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters. You can't ignore the will of the voters over and over again. WE DON'T WANT FANITH RANCH!!!!!!!

I143-1

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

I143-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgement of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I143-1 cont.

Santee citizens have spoken.PLEASE LISTEN

Thank you
Nancy Mc Daniel

Sandi Sawa, AICP, Director of Planning & Building

Dear Director Sawa and Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

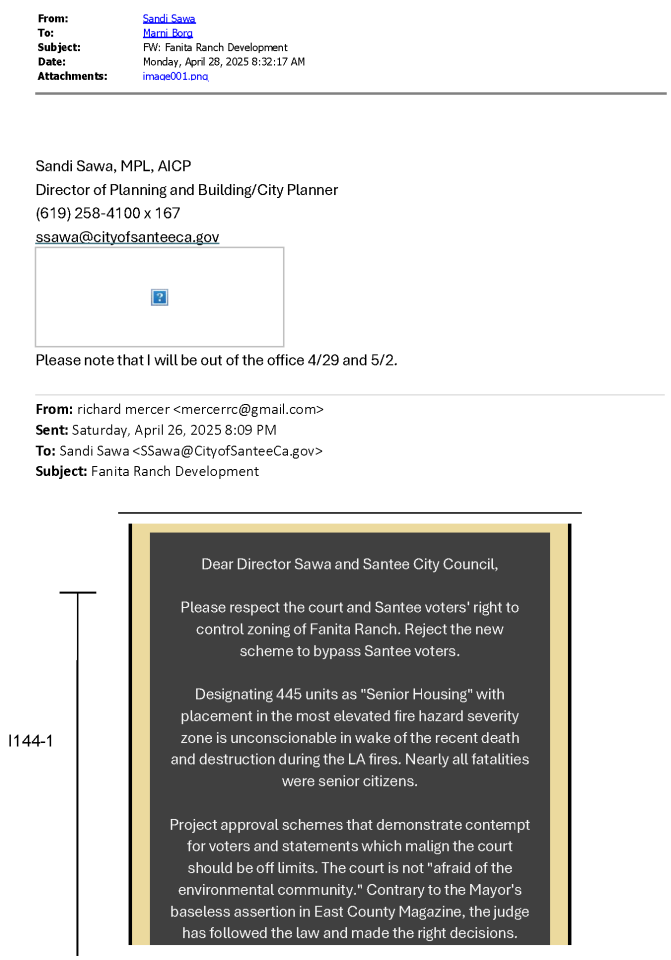
Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions. Rejection of the people and the court is a disservice.

Thank you

Comment Letter I144: Richard Mercer, April 26, 2025

I144



From: Sandi Sawa
To: Marni Borg
Subject: FW: Fanita Ranch Development
Date: Monday, April 28, 2025 8:32:17 AM
Attachments: image001.png

Sandi Sawa, MPL, AICP
Director of Planning and Building/City Planner
(619) 258-4100 x 167
ssawa@cityofsanteeca.gov

Please note that I will be out of the office 4/29 and 5/2.

From: richard mercer <mercerrc@gmail.com>
Sent: Saturday, April 26, 2025 8:09 PM
To: Sandi Sawa <SSawa@CityofSanteeCa.gov>
Subject: Fanita Ranch Development

Dear Director Sawa and Santee City Council,

Please respect the court and Santee voters' right to control zoning of Fanita Ranch. Reject the new scheme to bypass Santee voters.

Designating 445 units as "Senior Housing" with placement in the most elevated fire hazard severity zone is unconscionable in wake of the recent death and destruction during the LA fires. Nearly all fatalities were senior citizens.

Project approval schemes that demonstrate contempt for voters and statements which malign the court should be off limits. The court is not "afraid of the environmental community." Contrary to the Mayor's baseless assertion in East County Magazine, the judge has followed the law and made the right decisions.

I144-1

I144-1: The comment states that the Fanita Ranch Project (proposed project) would place senior housing in an elevated fire hazard severity zone. It also requests acknowledgement of the Santee voters' right to control zoning of Fanita Ranch.

Please refer to Thematic Response 1, Recirculation and Scope of Review Claims; Thematic Response 2, Wildfire Risk; and Thematic Response 3, No Public Vote Requirement. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Second Recirculated Sections of the Final Revised Environmental Impact Report for the proposed project. Therefore, no further response is required.

I144-1
cont.

Rejection of the people and the court is a disservice.

Thank you,

Mercer Family
Santee Residents 20 years

Chapter 2 Errata – Revisions or Clarifications to the Second Recirculated Sections of the Final Revised EIR and Technical Appendices

Based on the City of Santee's (City's) review and in response to the comments received, some text in the Second Recirculated Sections of the Final Revised Environmental Impact Report (EIR) for the Fanita Ranch Project (proposed project) has been clarified or augmented and a new technical appendix has been added. Changes to the wording of information added or deleted in the Second Recirculated Sections are presented below, with changes shown in underlined text (e.g., underlined text) and deletions in strikethrough text (e.g., ~~strikethrough text~~). Changes are presented by section in the order they appear in the Second Recirculated Sections. The sections where no revisions were made are not included in this chapter.

2.1 Section 4.10, Land Use and Planning

Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations

The following text revisions were made to clarify that the certification of the proposed project under Urgency Ordinance 592 would not waive consistency with the provisions of a future Habitat Loss Incidental Take Ordinance:

> Urgency Ordinance No. 592 controls over any other City plan or ordinance in the event of a conflict, with its interpretation being afforded the fullest possible weight to the interest, approval, and provision of housing except where City plans or ordinances relate to the implementation of state or federal regulations and/or permits (Appendix R).

These revisions do not change the calculations, analysis, or conclusions identified in the Second Recirculated Sections.

2.2 Appendix U, Wildfire Safety Memorandum

Appendix U, Wildfire Safety Memorandum, prepared by the Dudek Fire Protection Planning Team, has been added to the Final Revised EIR in response to wildfire safety concerns presented in the public comment letters and included as additional expert support for Thematic Response 2, Wildfire Risk. This addition does not change the calculations, analysis, or conclusions identified in the Second Recirculated Sections.

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Appendix U. Wildfire Safety Memorandum

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DUDEK
MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

Sandi Sawa, AICP, Director of Planning & Building
City of Santee
Planning & Building Department City Hall, Building 4
10601 Magnolia Avenue Santee, California 92071 [Client name]

May 27, 2025

Subject: Second Recirculated Sections of the Final REIR for Fanita Ranch

Dear Sandi:

Dudek provides the following response to the Center for Biological Diversity Fanita Ranch Project REIR comment letter, dated April 10, 2025, and other public comment letters which raise concerns about wildfire safety at Fanita Ranch.

In summary, a number of comment letters liken the Fanita Ranch project, a master-planned, ignition resistant community with the non-ignition resistant, vulnerable communities of Pacific Palisades and Altadena that burned during the January 2025 Los Angeles area wildfires, and the Lahaina community which also experienced a devastating wildfire. Further, the comment letters raise concern over new or changing conditions that would require additional analysis in terms of fire impacts related to Fanita Ranch. As discussed below, the Fanita Ranch project is quite unlike the Los Angeles and Lahaina communities referenced. Moreover, there is no basis for asserting that additional wildfire or evacuation analysis is required for the Fanita Ranch project based on the comments provided by the Center for Biological Diversity (CBD), or other comments received on this subject.

Initially, any comparison of the burned Palisades, Altadena and Lahaina communities with a new, master planned, ignition resistant community is inappropriate. Such comparisons mischaracterize and show a lack of understanding of the hazards, potential risk, and means by which new communities mitigate the types of devastation that occurred in these fires. The comparison between these fires and Fanita Ranch fire risk disregards the factors that determine how well a community will perform against wildfire, including: the fire environment and its potential hazards, customized maintained fuel modification zones, fire hardened structures, code-compliant access, fire-flow and hydrants, automatic interior fire sprinklers, flying ember protections, and ongoing maintenance, amongst others. All of these features are built into new master-planned communities, like Fanita Ranch. These features reduce risk of fire hazard severity zone locations to acceptable levels, as evidenced by new communities that have been tested by fire and reported no related structural damage.

The science of fire protection has been codified (California Fire, Building, and Residential Codes) so that new communities are required to be built to withstand the type of wildfire they may experience. The data (CAL FIRE State Fire Marshal's Office) indicates that new communities are performing well while older communities are experiencing structural losses. More specific responses follow and are provided in relation to the comment topic within the CBD's letter.

Note that the comment-referenced Los Angeles area wildfires occurred in a fire environment nearly 150 miles from Santee with different fuel types, weather, and terrain.

- In contrast to the commenters' characterization, the Palisades and Altadena fire devastation occurred due to the type of development that resulted in an urban conflagration (house to house ignitions), fueled by the mostly older and vulnerable construction (1950's, 1960's and 1970's) and lack of formal and maintained fuel modification, lack of reliable water for fire-flow, and lack of modern code-compliant access (IBHS

2025). Additionally, wildfire was not a focus of the planning, design, construction and maintenance of these communities like it is a new, master planned, ignition resistant community.

- Evacuation of Palisades was hindered by single access to some areas (e.g., Palisades Drive) that would not be code compliant today. Fanita Ranch would include code compliant primary and secondary access points.

- Regarding older adults, it is speculative to assume that Fanita Ranch's 55+ community would include a majority of individuals in the upper age ranges. It is considered an active adult community, not an assisted living community. Regardless of age, the Project provides options for evacuation or on-site sheltering. Along with an ongoing educational campaign to raise awareness and prepare individuals, it will not be beyond the capability of an active adult to drive out of the Project during an evacuation or to receive assistance through San Diego County programs that provide this type of help to residents who are not as mobile as others.

- The commenter seems to suggest that the updated CAL FIRE Fire Hazard Severity Zone Maps have changed conditions at the site. In fact, the updated FHSZ maps have not affected the Fanita Ranch site, and instead make small additions to the Very High zone in the project's vicinity, as well as the inclusion of High and Moderate zones. Fanita Ranch's Fire Protection Plan documents that the majority of the site was designated as a VHFHSZ and the design, protection features and other fire safety measures are a system that addresses the fire hazard. It is very important however to understand that there is a difference between a hazard designation and the potential risk to a building or community. High hazard does not result in high risk if the building or community mitigates the hazard. Newer County communities may be threatened by wildfire, but have been planned, designed, constructed, and maintained to withstand wildfire encroachment and ember storms.

  While Fanita Ranch is, and has been located in a designated Very High FHSZ, it will have significantly lower potential of actual loss than other older communities (such as Palisades and Paradise). This reasoning is based upon the distinction between HAZARD (which the State categorizes) and RISK (which the state does not quantify).

  HAZARD is a property of the potential fire behavior (flame length, crown fire occurrence, capacity to generate embers) in the likely mature vegetation of a given area. RISK, however, is the potential for structural loss from that fire. Thus, even if there is potential low fire hazard in a given area (expected low flame lengths), a given home might be at high risk of ignition if the physical characteristics of the property would facilitate structural ignition (e.g., flammable vegetation next to a home with wood siding).

  Conversely (and describing the condition at Fanita Ranch), a home might be in a high-hazard area (potential exposure to high flame lengths and ember generation) but may actually be at low risk of ignition if the house is built with ignition-resistant construction materials and the resident has created adequate defensible space around the home. This is especially true in planned communities where fuel modification can be provided over large areas and includes a perimeter zone. Syphard, et. al. (2013)[1] research indicates that scenarios with lower housing density, large lots (ranchettes) and larger numbers of small, isolated clusters of development resulted in higher predicted fire risk.

[1] 1] Syphard AD, Bar Massada A, Butsic V, Keeley JE (2013) Land Use Planning and Wildfire: Development Policies Influence Future Probability of Housing Loss. PLoS ONE 8(8): e71708. doi:10.1371/journal.pone.0071708

- The Fanita Ranch FPP identifies the area as having been subject to wildfires. However, areas that are developed with ignition resistant and managed landscapes built to the latest requirements for building in a FHSZ remove the fuels that facilitate fire spread and the fire history in that footprint ceases. Because there were historical wildfires in an area does not indicate future fires, particularly in the developed areas.

- The commenter's statistics regarding the propensity for older people having a higher likelihood of dying in a fire are misleading as they are based on structure fires, not wildfires and it is not clear if those structures were equipped with automatic sprinkler systems, but were likely not provided this life-saving feature. The Project would not be expected to see wildfires encroach into the community and structure fires that do happen will be controlled by automatic sprinkler systems that have a 97% plus success rate of keeping a fire in the room of origin and aiding resident evacuation from the building.

- The number of 65 and older people that died in Lahaina and Paradise are not associated with an active adult, modern, ignition resistant community. They lived in various areas with varying levels of fire safety, fire protection, evacuation plans, and shelter in place options. Comparing these areas with a master planned community's active adult community is inappropriate and invalid.

- The project provided a site-specific analysis of fire behavior using worst-case historical weather input conditions and provided a system of protection that exceeds the needs for those results. The older and vulnerable buildings in Palisades and Alta Dena were the driver for the fire devastation that occurred. Had those areas included the same type of master planned community as Fanita Ranch, the results would have been significantly different and would have been in line with the Orchard Hills community in Irvine that experienced no impacts from a significant wildfire under Santa Ana conditions (Silverado Fire 2020).

- The Project's FPP analyzes fire behavior with input and review from the Santee Fire Department. The FPP accounts for Santa Ana driven wildfires, fast fire spread rates, and fire intensity and provides a site-specific fire protection system designed to address the hazard and reduce the risk to acceptable levels. The statistics that the commenter provided regarding lost homes to wildfire completely ignores the age of the homes, their vulnerability to fire and embers, and the type of fuel modification provided. It is important to note that no master-planned community built after the adoption of California Building Code Chapter 7A has suffered extensive structural losses (Grijalva 2022)[2].

- Emergency Alerts of evacuation areas in Santee include a layered approach so that if one system fails, there are backups in place. Alerts do not rely on the WEA alone, but include WEA, Alert San Diego (Reverse 911), Television, Radio, social media, and in the field law enforcement and fire personnel. Per the Fanita Ranch Evac Plan: Visitors and guests to the Fanita Ranch will be advised of their options during an emergency by law enforcement or fire officials, residents whom they are visiting, commercial vendor staff, or HOA representatives, as appropriate.
- Older adults who refused to evacuate in the wildfires referenced by the commenter and lost their lives were not located in master planned active adult communities. They likely did not receive ongoing education

[2] Grijalva, Ruben. January 2022. Former CAL FIRE Director. Letter to California Board of Forestry regarding safety of Master Planned Communities Citing State Fire Marshal Data.

regarding wildfire and evacuation. Fanita's 55+ (and entire population) will receive ongoing educational outreach and fire readiness and will have the benefit of a large ignition resistant landscape and structures as well as nearby shelters in which they can be relocated. In the fire examples provided by the commenter, evacuation was of far more importance due to the wildfire vulnerability of the homes/structures and the exposure along evacuation routes out of the areas. Fanita includes a fire hardened community and fire-hardened evacuation routes into the urbanized areas of Santee. Very different conditions than the examples provide and not valid comparisons.

- The Fanita Ranch community will provide information to residents regarding notifying County OES and Health and Human Services of special needs residents so that accommodations for their notification

  (Accessible AlertSanDiego, CERT programs, or other), transportation or other special requirements can be provided during an emergency evacuation. Visitors and guests to the Fanita Ranch will be advised of their options during an emergency by law enforcement or fire officials, residents whom they are visiting, commercial vendor staff, or HOA representatives, as appropriate.

  Care for Fanita Ranch's 55+ would be through County and City programs, although for Fanita Ranch, there could be evacuation, or temporary relocation into other parts of the community or into Santee with a short duration since there would be a very minimal possibility of structural losses and disruption. The project is designed to withstand wildfire and keep homes intact. Palisades and Paradise were not.

  Regarding smoke-related health issues, wildfires occurring in and around Fanita Ranch would be short duration as the fuels burned and the fire was driven around the project, further downwind. Residents would be evacuated via the multiple evacuation routes or in a short-notice wildfire event where residents were sheltered on-site, they would be instructed to remain indoors with windows closed.

- The commenter continues to compare the Project and its fire environment with areas that include virtually none of the protective features that result in a fire hardened community. There may be an increased wildfire hazard in some areas in and around Fanita Ranch, but as discussed, any increased risk is based on the lack of protections provided, which in most cases, is associated with fire-vulnerable communities, not new master-planned, ignition resistant communities. Fanita Ranch's wildfire risk is low, as confirmed by Santee Fire Department's evaluation and acceptance of the Project's FPP and given the fire protection features specifically provided and guided by the fire authority and the well-tested code requirements.

- There is no nexus for re-evaluating the Project as there is no new significant information that hasn't already been addressed in the project's FPP regarding wildfire hazard and risk reduction.

Sincerely,

Dudek Fire Protection Planning Team

Michael Huff
Sr. Director/Vice President

FINAL

Second Recirculated Sections of Final Revised Environmental Impact Report

Fanita Ranch Project

February 2025 SCH No. 2005061118

Harris & Associates

Santee
DO MORE ▸ DUE EAST

CITY OF SANTEE, CALIFORNIA
INCORPORATED 1980

FINAL

Second Recirculated Sections of Final Revised Environmental Impact Report

Fanita Ranch Project

SCH No. 2005061118

February 2025

Prepared for:

City of Santee
Department of Development Services
10601 Magnolia Avenue
Santee, California 92071

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Chapter 0 Preface

This chapter describes why portions of the Final Revised Environmental Impact Report (REIR) for the Fanita Ranch Project (proposed project) are being revised and recirculated under the California Environmental Quality Act (CEQA), provides an overview of the content and scope of the Second Recirculated Sections of the Final REIR (Second Recirculated REIR), and summarizes the public comment period after the Second Recirculated REIR has been made available for public and agency review.

0.1 Summary

In September 2020, the City of Santee's (City's) City Council certified the Final REIR for the proposed project as compliant with CEQA. The Final REIR was prepared to analyze the potential significant environmental impacts resulting from the construction and operation of the proposed project. A lawsuit was filed challenging the adequacy of the Final REIR.

In March 2022, the San Diego County Superior Court (Hon. Katherine A. Bacal, presiding) issued a ruling identifying deficiencies in the Final REIR related to evacuation in the event of a wildfire. In March 2022, the trial court entered judgment and a writ of mandate (order) directing the City to set aside certification of the Final REIR and the project approvals for the proposed project. The matter was thereby remanded to the City to correct the deficient portions of the Final REIR.

Recirculated Sections were prepared in June 2022 to correct the deficiencies identified in the trial court's 2022 ruling, judgment, and writ. The Recirculated Sections included new or replaced Chapter 0, Preface, and Section 4.18, Wildfire, in their entirety. The Recirculated Sections also included strikeout/underline changes to Chapter 3, Project Description, and Section 4.10, Land Use and Planning, because the proposed project no longer requested legislative approvals, including a General Plan Amendment, Specific Plan, Rezone, or Development Agreement, but instead requested adjudicatory approval of a Development Plan, Vesting Tentative Map, Development Review Permit, and Conditional Use Permits. On September 14, 2022, the City Council held a public hearing and voted unanimously to certify the Final Recirculated REIR and approve the proposed project.

Another lawsuit was filed challenging the adequacy of the Final Recirculated REIR. In September 2024, the San Diego County Superior Court (Hon. Katherine A. Bacal, presiding) issued a ruling identifying deficiencies in the Final Recirculated REIR related to Santee General Plan inconsistency. No other deficiencies in the Final Recirculated REIR were identified. The matter was remanded to the City to correct the deficient portions of the Final Recirculated REIR. The ruling, judgment, and writ are attached hereto as Appendix S.

This Second Recirculated REIR has been prepared to correct the deficiencies identified in the trial court's 2024 ruling, judgment, and writ. Pursuant to CEQA, if revisions to an EIR are limited to chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified (CEQA Guidelines, Section 15088.5[c]). Therefore, this Second Recirculated REIR includes this Chapter 0, Preface, and strikeout/underline changes to Section 4.10, Land Use and Planning, because only portions thereof have been modified.

Those portions of the Final Recirculated REIR, inclusive of the Final REIR, that were not found deficient will not be recirculated. Pursuant to CEQA Guidelines, Section 15088.5(f)(2), the City will not seek or entertain any further comments on those portions of the Final Recirculated REIR.

The City will prepare written responses to comments received on the Second Recirculated REIR. Thereafter, the City will complete the Final Second Recirculated REIR, consisting of the Second Recirculated REIR, public comments, written responses to comments, and any revisions identified. The City Council will then review the Final Second Recirculated REIR, along with the portions of the Final Recirculated REIR that were not subject to revision, consider the information presented therein before acting on the proposed project, and determine if the Final Second Recirculated REIR, as modified, is adequate, complete, in compliance with CEQA, and reflects the City Council's independent judgment and analysis.

The Second Recirculated REIR has been prepared to address the CEQA deficiency identified in the trial court's ruling. Specifically, the court found that the Final Recirculated REIR failed to adequately disclose the proposed project's inconsistency with the Santee General Plan, which violations were intertwined with the bases for finding inconsistencies with the Santee General Plan (Appendix S [Ruling pp. 5–8]):

- "According to respondents, the project is consistent with the general plan because it was certified as an essential housing project, and so the City was not required to analyze and disclose any claimed inconsistencies" (Appendix S [Ruling p. 5]). The City did not "clearly explain where and how" the City's Essential Housing Program fits in the land use hierarchy (Appendix S [Ruling pp. 7–8]).
- Under the Housing Accountability Act (California Government Code, Section 65589.5), "concluding a particular basis for a project is not inconsistent with the general plan does not necessarily mean that a project is therefore consistent with a general plan" (Appendix S [Ruling pp. 7–8]).
- "[N]either the Density Bonus Law, including section 65915(n), nor the Housing Accountability Act are mentioned in the City's findings of fact and statement of overriding considerations" and "relying on these bases after the findings of fact were made justifying approval the project are thus unpersuasive" (Appendix S [Ruling p. 8]).
- "The City's most recent housing element acknowledged that it removed the prior density bonus program ordinance" to comply with state law. Therefore, the City's

argument that "the ordinance no. 592 is essentially the local ordinance version of the density bonus law that gave it express statutory authority to proceed with its essential housing program based on Government Code section 65915(n)" was "unconvincing" (Appendix S [Ruling p. 8]).

The Second Recirculated REIR responds to the deficiencies in the following manner:

Revisions to Section 4.10, Land Use and Planning

The City has revised the regulatory framework and analysis sections of Section 4.10, Land Use and Planning (Sections 4.10.2 and 4.10.5.2). A summary of these revisions is provided below.

Section 4.10.2, Regulatory Framework

This section describing the existing regulatory framework has first been revised to include state housing laws relevant to the proposed project's consistency with the Santee General Plan, including the Density Bonus Law (DBL) (California Government Code, Section 65915), the Housing Accountability Act (California Government Code, Section 65589.5), and the Housing Crisis Act of 2019 (Senate Bill 330).

This section has also been revised to better describe the Santee General Plan's consideration and guidance for development of the Fanita Ranch property. Further, a discussion of Section 13.26.010 of the City's Zoning Ordinance, which implements the minimum requirements to comply with the DBL in the City, has been added.

Finally, revisions have been made to the discussion of the City's Essential Housing Program, Urgency Ordinance No. 592. The revisions address amendments to the program adopted in light of the court's decision. These amendments clarify the City's authority for adopting the program, including that the program has been adopted in accordance with subdivisions (n) and (r) of the DBL, which empower the City to adopt an ordinance to grant concessions, waivers, and density bonuses for housing projects that exceed or may not meet the strict requirements of the DBL. That is, the Essential Housing Program is not the City's ordinance that specifies how minimum compliance with the DBL will be achieved (California Government Code, Section 65915 [a][1]) but is an authorized expansion of density bonus benefits to promote the efficient development of housing (California Government Code, Section 65915[n], [r]; see also, subdivision [s]).

Section 4.10.5.2, Project Impacts and Mitigation Measures, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations

This section analyzes the proposed project's potential to "cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect." The revisions more explicitly detail the relevant Santee General Plan policies and guidance, Planned Development designation, and "Guiding Principles"

framework for the project site. Limitations established in the Housing Accountability Act regarding "subjective" standards are also addressed.

The discussion of project consistencies and inconsistencies with the Guiding Principles for the project site has been revised to more explicitly identify each principle, whether it was "adopted for the purpose of avoiding or mitigating an environmental effect," and to evaluate whether the project would result in a significant environmental impact due to a conflict with the "land use plan, policy, or regulation." As detailed in Section 4.10.5.2, while the proposed project does not meet the exact requirements of Guiding Principles 3 (lot size), 9 (golf course or recreational facility), and 14(e) (development agreement), the proposed project would not result in significant environmental impacts due to any conflicts with the Guiding Principles specifically adopted to avoid or mitigate environmental effects per the CEQA threshold.

Additionally, revisions in the Second Recirculated REIR demonstrate that the proposed project does not conflict with these Guiding Principles because it is entitled to waivers of development standards under the DBL and the City's Essential Housing Program.

Density Bonus Law Revisions

The Second Recirculated REIR explains that the proposed project does not require a legislative act, such as a General Plan Amendment, Specific Plan, or Rezoning should the City find it is entitled to mandatory waivers and under the DBL (California Government Code, Section 65915, et. seq.) for the provision of a senior citizen housing development, as defined by statute (California Government Code, Section 65915[b][1][C] and [e][1]). As stated by the California Department of Housing and Community Development, "For the purposes of the S[tate] DBL, any hierarchy between planning documents is flattened."[1]

The proposed project would provide approximately 445 age-restricted residential units in a variety of building types with densities ranging from five to 25 residential units per acre, far surpassing the 35 units needed to qualify the whole project for the density bonus and waiver benefits of the DBL (California Government Code, Section 65915[b][1][C], [e][1]).

If the City finds that the proposed project qualifies for benefits under the DBL, the revisions in Section 4.10 explain that the City must waive any development standard that will have the effect of physically precluding the project's construction at the densities and with the amenities proposed. (California Government Code, Section 65915[e][1], [o][2]). The proposed project is entitled to mandatory waivers of the lot size standard in the Guiding Principles because it would physically preclude construction of the proposed project's 2,949 to 3,008 units, including the 445 age-restricted senior units, as designed and with the amenities proposed. Waivers are similarly

[1] Letter to City of Los Angeles, City of Los Angeles Density Bonus Law Implementation – Letter of Technical Assistance (July 31, 2024). https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/HAU/los-angeles-hau399-ta-qcondition-073124.pdf.

appropriate for the few minor variations from Guiding Principle 9, discussed above. The DBL is to be "interpreted liberally in favor of producing the maximum number of total housing units," supporting the application of waivers here (California Government Code, Section 65915[r]).

The granting of density bonus benefits "shall not require, or be interpreted, in and of itself, to require a General Plan Amendment, local coastal plan amendment, zoning change, or other discretionary approval" (California Government Code, Sections 65915(f)(5), (j)(1).) Further, "waived zoning standards are not 'applicable'" to determine "consistency with applicable general plan designations and policies and applicable zoning designations and regulations" (Wollmer v. City of Berkeley [2011] 193 Cal.App.4th 1329, 1349; see also, California Government Code, Sections 65589.5[j][3], 65905.5[c][1]). ("The receipt of a density bonus, incentive, concession, waiver, or reduction of development standards pursuant to Section 65915 shall not constitute a valid basis on which to find a proposed housing development project is inconsistent, not in compliance, or not in conformity, with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision specified in this subdivision.") Thus, with mandatory waivers and/or incentives, the proposed project is consistent with the Santee General Plan and other applicable ordinances.

Essential Housing Program

As with the revisions to the Regulatory Framework section discussed above, revisions have been made in the analysis section to address amendments to the City's Essential Housing Program adopted in light of the court's decision. These amendments clarify the City's authority to adopt the program and its relationship to the DBL. The revisions clarify that projects certified under the program are entitled to an appropriate density bonus, incentives, and/or waivers to develop at the density and with the amenities proposed to eliminate any inconsistency with zoning regulations or development standards. Projects are thereby established to be consistent with the Santee General Plan and do not require a General Plan Amendment or other legislative act for approval. Refer to the discussion above.

Table 4.10-1, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Table 4.10-1 has been revised to address those policies adopted by Measure N—Objective 12.0 and Policies 12.1 through 12.4. The Second Recirculated REIR explains why each policy is inapplicable and negated because the proposed project does not require a General Plan Amendment through the use of DBL waivers, incentives, and/or Essential Housing Program certification, described above, and that Senate Bill 330's limits on growth control measures preempt the requirement during the statewide housing crisis.

In sum, the Second Recirculated REIR more thoroughly discusses the Santee General Plan, discloses potential inconsistencies with the Guiding Principles, discusses the consistency with the policies adopted by Measure N, and details several separate and distinct bases for determining that there would be no significant environmental impact related to conflict with the Santee General Plan policies or regulations that were adopted to avoid or mitigate an environmental effect.

Chapter 3, Project Description, of the previously certified Final Recirculated REIR correctly describes both the physical features of the proposed project and discretionary approvals requested from the City to include EIR certification and approval of a Development Plan, Vesting Tentative Map, Development Review Permit, and Conditional Use Permits. Thus, the remainder of the Final Recirculated REIR accordingly remains unchanged.

Appendices S and T

Appendices S and T have been included in the Second Recirculated REIR. Appendix S consists of the trial court's ruling, judgment, and writ, and Appendix T consists of a memorandum providing additional legal support and analysis for the discussion in Section 4.10, Land Use and Planning.

Table 0-1 provides a brief overview of the Second Recirculated Sections of the Final REIR and their rationale for inclusion in the recirculation.

Table 0-1. Second Recirculated Sections of the Final REIR

Second Recirculated Sections	Rationale for Inclusion in Second Recirculation
New Sections	
Chapter 0, Preface	This preface is included in the second recirculation to provide the public with information concerning the trial court's ruling and Second Recirculated REIR modifications to correct deficiencies identified in the trial court's ruling. This preface is a new section of the Second Recirculated Sections that has not been previously released for public review.
Revised Sections	
Section 4.10, Land Use and Planning Portions of Sections 4.10.2 and 4.10.5.2 Only	These sections describe the existing regulatory framework and evaluate whether the proposed project would conflict with land use plans, policies, and regulations adopted for the purpose of mitigating or avoiding an environmental effect. The revisions in these sections add a discussion of state housing laws and clarify the proposed project's consistency with Santee General Plan policies, regulations, and Guiding Principles; the proposed project's entitlement to benefits under the DBL; and its entitlement to waivers/incentives under the City of Santee's Essential Housing Program, Urgency Ordinance No. 592, as amended. The revisions explain that no legislative action, including any General Plan Amendment, can be required for the proposed project to proceed in light of state housing laws. Table 4.10-1 has been updated to address consistency with Measure N policies.
New Appendices	
Appendix S	This appendix consists of the latest ruling, judgment, and writ.
Appendix T	This appendix provides additional background, legal support, and analysis for the discussion in Section 4.10, Land Use and Planning.

Notes: DBL = Density Bonus Law

Only the above-outlined revised information is contained in the Second Recirculated Sections. All other sections of the Final Recirculated REIR and technical studies remain valid and are not being recirculated for public comment.

0.2 Public Review of Second Recirculated Sections of the Final REIR for Fanita Ranch

The Second Recirculated Sections of the Final Recirlated REIR are available for public review and comment. The City requests that reviewers limit all public comments to the recirculated documents described in Table 0-1. The 45-day public review period is from February 24, 2025, to April 10, 2025. All comments received on the Second Recirculated Sections will be responded to and incorporated into a responses to comments document, which the City will evaluate before a public hearing to consider certification of the Second Recirculated Sections, along with other Final Recirculated REIR sections. The Second Recirculated Sections will be available to review electronically on the City's website at https://www.cityofsanteeca.gov during the 45-day public comment period.

Upon request, the Second Recirculated Sections will be available for review during regular business hours for the duration of the 45-day public review period at the following City Hall locations:

- City of Santee of Planning and Building Department
- City of Santee Clerk's Office
- Santee Branch of the San Diego County Library

Written and electronic comments addressing the Second Recirculated Sections can be mailed or emailed to the following:

Sandi Sawa, AICP Director of Planning & Building
Subject: Second Recirculated Sections of the Final Revised EIR for Fanita Ranch
Department of Development Services
City Hall, Building 4
10601 Magnolia Avenue
Santee, California 92071
Telephone: (619) 258-4100, extension 167
Email: ssawa@cityofsanteeca.gov

Written and electronic comments addressing the Second Recirculated Sections must be received by 5:00 p.m. (Pacific) on Thursday, April 10, 2025. The City's servers have limitations on receiving large files (maximum 10 MB). To ensure your comments are considered, it is recommended that you confirm timely receipt of any large file submissions. The City can provide a link, upon request, if the file(s) is larger than 10 MB. Comments not received by the City may not be considered.

For additional information, please contact Sandi Sawa at (619) 258-4100, extension 167, or ssawa@cityofsanteeca.gov.

0.3 Concurrent Preparation of the Administrative Record

In compliance with California Public Resources Code, Section 21167.6.2:

> THIS DOCUMENT IS SUBJECT TO SECTION 21167.6.2 OF THE PUBLIC RESOURCES CODE, WHICH REQUIRES THE RECORD OF PROCEEDINGS FOR THIS PROJECT TO BE PREPARED CONCURRENTLY WITH THE ADMINISTRATIVE PROCESS; DOCUMENTS PREPARED BY, OR SUBMITTED TO, THE LEAD AGENCY TO BE POSTED ON THE LEAD AGENCY'S INTERNET WEB SITE; AND THE LEAD AGENCY TO ENCOURAGE WRITTEN COMMENTS ON THE PROJECT TO BE SUBMITTED TO THE LEAD AGENCY IN A READILY ACCESSIBLE ELECTRONIC FORMAT.

The record of proceedings can be accessed at https://www.cityofsanteeca.gov.

4.10 Land Use and Planning

The section addresses potential land use and planning impacts that may result from construction or operation of the Fanita Ranch Project (proposed project). The following discussion addresses the existing land use and regulatory conditions of the affected environment, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed project, as applicable.

4.10.1 Environmental Setting

The proposed project is located within the limits of the City of Santee (City). The project site is bordered by Marine Corps Air Station Miramar and Padre Dam Municipal Water District (PDMWD) facilities to the west, including Santee Lakes Recreation Preserve; open space/recreational areas, including Goodan Ranch/Sycamore Canyon County Preserve to the north and west; City residential neighborhoods to the south; and the unincorporated residential community of Eucalyptus Hills to the east (see Figure 3-2, Project Site, in Chapter 3, Project Description).

4.10.1.1 On-Site Land Uses

The project site consists of approximately 2,638 acres of undeveloped canyons, hillsides, and valleys. The project site is characterized by a series of ridgelines and finger canyons predominantly in the northern and central portions of the site that trend in a northeast–southwest direction. Because the project site is undeveloped, it includes several biological communities with varied habitat including wetland, riparian, chaparral, coastal sage scrub, and disturbed grassland. Historical uses of the project site include cattle grazing and possible military training. The San Diego Gas and Electric Company owns a 150-foot-wide transmission line easement that traverses the central portion of the project site from east to west. A water reservoir tank operated by PDMWD north of the current terminus of Carlton Hills Boulevard is also located on site. The site supports a complex system of dirt roads and pioneered trails, many of which have non-authorized use from off-road vehicle traffic, bikers, hikers, dog walkers, and other forms of recreation. Some of the dirt roads occur on a San Diego Gas and Electric Company easement providing necessary access to power transmission lines. The site is regularly used by helicopter pilots and local first responder personnel for training purposes.

4.10.1.2 Existing Surrounding Land Uses

City of Santee

The area directly south of the project site is primarily single-family detached residences on 6,000 square-foot lots. The single-family neighborhood of Carlton Hills is south of the project site immediately east of Fanita Parkway. Along portions of the project site's southeastern boundary are low density and hillside/limited residential areas that permit one residential unit per acre. Directly east of that is land

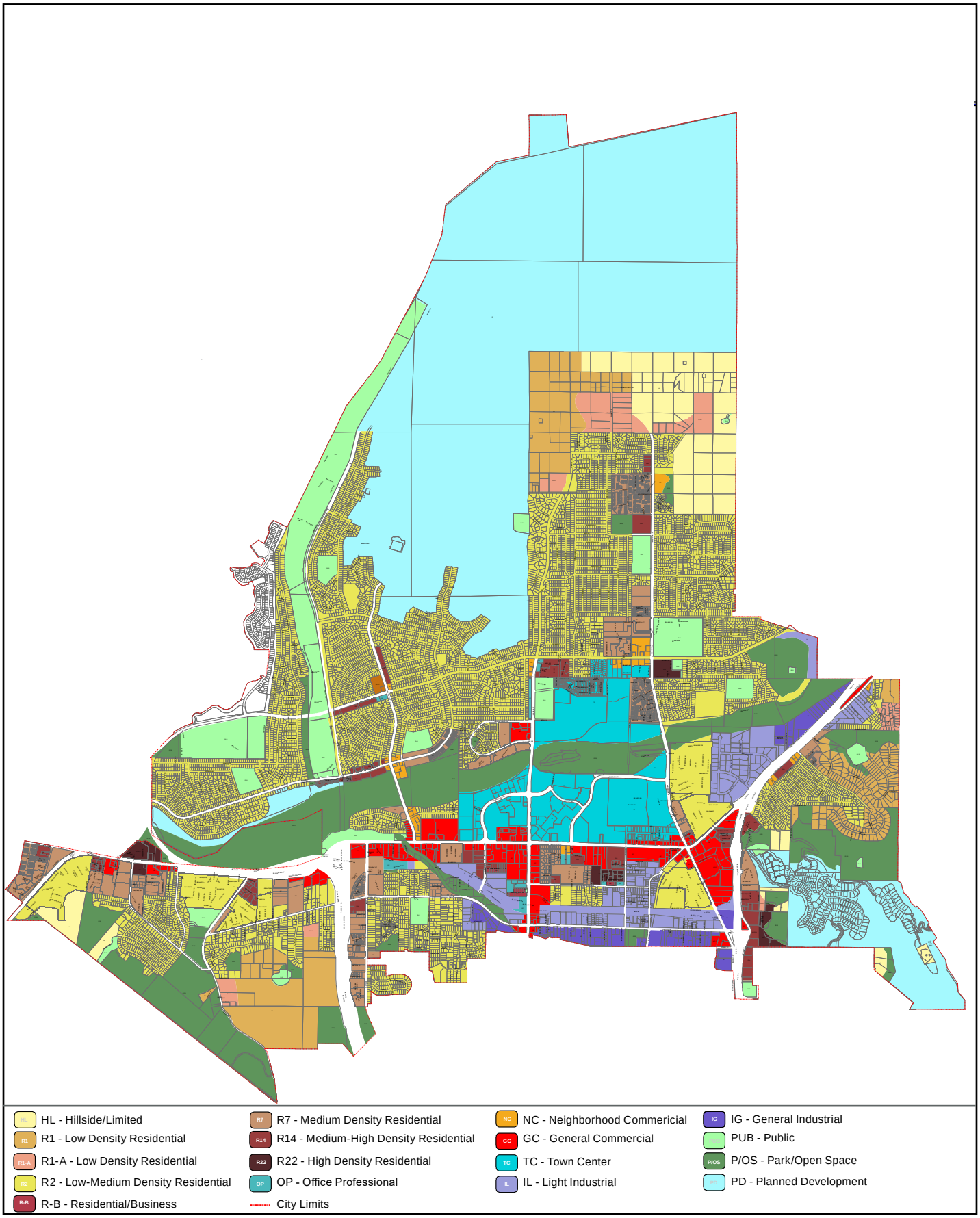
designated as Hillside/Limited (HL). The Hillside/Limited (HL) designation is intended for residential development in areas that exhibit steep slopes, rugged topography, and limited access. Multi-family units (apartments, townhomes, and condominiums) are located predominately along Santee's major roads, including Mast Boulevard, Cuyamaca Street, and Magnolia Avenue south of the project site. Refer to Figure 4.10-1, City of Santee General Plan Land Use Map.

Surrounding the southern portion of the project site is a network of existing roads in the City. Fanita Parkway and Cuyamaca Street travel in a north–south direction south of the project site on the western side and toward the middle of the project site, respectively. Magnolia Avenue runs in a north–south direction east of the southern portion of the project site. South of the project site is Mast Boulevard, which travels in an east–west direction and joins SR-52 just west of the project site. In addition, over 20 residential roads terminate at the southern project site boundary.

The Santee Lakes Recreation Preserve, located west and south of the project site, is owned and operated by PDMWD. It consists of approximately 190 acres, including a campground, the Ray Stoyer Water Recycling Facility, and seven recycled-water lakes. The PDMWD Ray Stoyer Water Recycling Facility treats approximately 2 million gallons per day, some of which is used to recharge the lakes. The seven lakes are located within the former streambed of Sycamore Canyon Creek and are regarded as a major visual and recreational feature in Santee. Recreational activities at this Regional Park include boating, fishing, camping, picnicking, and other forms of outdoor recreation (City of Santee 2003).

County of San Diego

Lands adjacent to the northern and northeastern boundaries of the project site fall within the County of San Diego's (County's) Lakeside Community Plan area. The community of Lakeside is generally located in the western foothills of the Cuyamaca Mountains on the San Diego River and has a rural residential atmosphere. A considerable amount of small-scale farming exists in the community. Many residences include small horse corrals, indicating a high degree of horse ownership. Also included in Lakeside Community Plan Area is Slaughterhouse Canyon, a relatively large area northeast of the project site, separated from the site by a large hillside, where active mining operations take place. East of the project site is the residential subdivision known as Eucalyptus Hills. The San Diego County General Plan Land Use designation for Eucalyptus Hills is Semi-Rural 1 (SR-1), which allows densities of one residential unit per 1, 2, or 4 acres (County of San Diego 2011).



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Source: City of Santee 2020.

Harris & Associates

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Figure 4.10-1

City of Santee General Plan Land Use Map

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North of the project site and west of SR-67 lies the 2,272-acre Goodan Ranch/Sycamore Canyon County Preserve, which is managed by the County's Parks and Recreation Department (County of San Diego 2019). These adjacent parks are designated as Open Space (Conservation) in the Lakeside Community Plan. The Regional Parks are used for passive recreation including equestrian and pedestrian trails. The area located south of Goodan Ranch/Sycamore Canyon County Preserve and north of the project site is designated as Rural Land (RL-40) (one residential unit per 40 acres) and Open Space (Conservation) by the San Diego County General Plan and zoned Agriculture (A70) and Specific Plan (S80). This area is currently undeveloped.

Marine Corps Air Station Miramar

Lands adjacent to the western boundary of the northern portion of the project site are part of Marine Corps Air Station (MCAS) Miramar and are under the jurisdiction of the Department of the Navy. MCAS Miramar encompasses 23,065 acres and is generally bisected by Kearny Villa Road. MCAS Miramar includes thousands of acres of undeveloped land, with a large portion being natural open space. The MCAS Miramar Airport Influence Area (AIA) extends onto the northern portion of the project site and is subject to compatibility analysis.

Developed areas within MCAS Miramar cover about 4,088 acres, including approximately 350 buildings. Uses include aircraft operation and maintenance facilities, runways, utilities, administrative and residential buildings, fuel storage, other storage and supply facilities, research facilities, recreation areas, and civilian leases. Military land uses at MCAS Miramar include operational (e.g., aircraft operations) and non-operational (e.g., community support) uses and functions. Land uses not directly related to the military also take place within MCAS Miramar. These include leases and easements for public highways, roadways, utilities, and landfills, encompassing about 2,900 acres (Dames and Moore, Inc. 2005).

MCAS Miramar is divided into three regions: Main Station, South/West Miramar, and East Miramar. East Miramar is located east of Interstate 15 (I-15) and borders the project site. East Miramar is largely undeveloped and is used for military training and operational exercises and supports the military need for encroachment and access control (Dames and Moore, Inc. 2005). Primary military land uses in this area include field training, ordnance storage and assembly, small arms ranges, and warehousing. There are five dedicated training areas within East Miramar. Specifically, the area adjacent to the project site is called Training Area 1 and is used for infantry training maneuvers, including land navigation training and overnight camping. A Confined Area Landing site is located in this area for rotary-wing flight operations.

Gillespie Field Airport

Gillespie Field Airport is located approximately 2.5 miles south of the project site within the City of El Cajon. It encompasses approximately 757 acres and is owned and operated by the County's Department of Public Works. The airport has three runways and several helipads with two of the

runways running parallel in an east–west alignment and one crosswind runway oriented in a north–south alignment. Gillespie Field provides flight schools, repair and maintenance shops, aircraft storage, food and beverage services, fuel, instrument and avionics shops, rental cars, and aircraft sales and rental services. Almost two-thirds of total annual operations at Gillespie Field are performed by single-engine piston aircrafts, while helicopters account for approximately one-quarter (SDCRAA 2010). The Gillespie Field AIA extends onto the southern portion of the project site; therefore, the project site is subject to compatibility analysis.

City of San Diego

Lands adjacent to the western boundary of the southern portion of the project site are within the East Elliot area of the City of San Diego. The East Elliott Community Plan (City of San Diego 2015) was adopted by the City in 1971, and most recently amended in 2015, to provide guidance for development of this area. Urban development is largely infeasible in East Elliot due to its rugged topography and variety of natural resources. Approximately 2,212 acres of the total 2,745 acres in the East Elliot planning area are designated Open Space land. In 1997, the Multiple Species Conservation Program (MSCP) included the majority of East Elliott in the Multiple Habitat Planning Area (MHPA) to be preserved as natural habitat. Outside of the MHPA boundaries, there are areas within the community plan designated for Low Density Residential development with 45 maximum single-family residential units. These areas are currently undeveloped.

The remaining area of the East Elliot Community Plan is a 517-acre area designated for and currently in use as Sycamore Landfill. Sycamore Landfill is located in Little Sycamore Canyon, accessed from SR-52, approximately 1.8 miles southwest of the project site. Sycamore landfill is operated as a Class III solid waste landfill for the disposal of non-hazardous solid waste and primarily serves residents from the eastern part of the San Diego Metropolitan area, including the Cities of San Diego, Santee, El Cajon, Poway, La Mesa, and Lemon Grove, as well as surrounding unincorporated areas under County jurisdiction (City of San Diego 2012). In 2012, the City of San Diego approved an expansion of Sycamore Landfill by 28.6 acres to increase its lifetime from year 2031 to 2040.

Mission Trails Regional Park

Mission Trails Regional Park is approximately 2 miles southwest of the project site in the City of San Diego. It is a 5,800-acre natural resource park. It is owned and operated by the City of San Diego in partnership with the Mission Trails Regional Park Foundation. The park is bounded by MCAS Miramar and SR-52 to the north, the communities of Tierrasanta and San Carlos to the west and south, respectively, the City to the east, with the East Elliott Community Plan Area acting as a buffer area between the project site and the Regional Park. According to the Mission Trails Regional Park Master Plan Update (City of San Diego 2019), the City of San Diego, along with other federal, state, local, private, and non-profit land conservation partners, has been actively

pursuing the acquisition of land in the East Elliot Community Plan Area. East Elliot is directly north of the Mission Trails Regional Park separated by SR- 52. If it is acquired, it would become part of the existing Mission Trails Regional Park bringing the total acreage of the Regional Park to 9,780 acres (City of San Diego 2019).

Although largely surrounded by residential development, the park contains mountains, valleys, two lakes, a major river and scenic gorge, historic landmarks, wildlife habitats, and cultural resources. The San Diego River and Mission Gorge cut through the park's main ridgeline with the southern end of Mission Gorge containing the park's visitor center and outdoor amphitheater. Because 87 percent of the total existing Mission Trails Regional Park area is included in the MHPA, a majority of the park is anticipated to remain in a natural or near natural state. The main active uses of the park are group picnicking, hiking, biking, rock climbing, boating, and fishing.

State Highways

SR-52 approaches the City from the west, crosses through the City, and terminates at SR-67. SR-67 currently approaches the City from the south, skirts the eastern boundary of Santee, and heads north–northeast toward Lakeside. SR-125 currently approaches the City from the south and terminates just south of the San Diego River at SR-52.

4.10.2 Regulatory Framework

State housing laws apply to the proposed project and are discussed in the following sections. Several regional and local plans have been adopted that apply to the project site and are discussed in the following sections. No federal ~~or state land use~~ plans apply to the proposed project.

4.10.2.1 State

Density Bonus Law (California Government Code, Section 65915 et seq.)

Originally enacted in 1979, California's Density Bonus Law (California Government Code, Section 65915–65918) allows a developer to increase density on a property above the maximum set under a jurisdiction's General Plan land use plan and zoning regulations. The granting of density bonus benefits does not require a General Plan Amendment, Local Coastal Plan Amendment, Zoning Change, or other discretionary approval (California Government Code, Section 65915[f][5], [j][1]). Projects that meet the eligibility requirements of Density Bonus Law (DBL) are entitled to (1) a density bonus (or bonuses) above the maximum allowable residential density, (2) incentives/concessions, (3) development standard waivers, and (4) significantly reduced parking requirement (California Government Code, Section 65915[b]). The DBL requires cities to adopt an ordinance to implement the state law; however, the failure to do so does not relieve a city from complying with the statute (California Government Code, Section 65915[a][1]).

In addition to mandating density bonus benefits, Section 65915(n) provides that an agency may permissively award extra units or benefits to a development, or it may extend density bonus benefits to developments that do not meet the requirements of DBL. Further, the legislature has directed that DBL be "interpreted liberally in favor of producing the maximum number of total housing units (California Government Code, Section 65915[r]).

Housing Accountability Act (California Government Code, Section 65589.5)

California's Housing Accountability Act (HAA) aims to prevent local governments from arbitrarily denying or reducing the density of housing development projects that comply with existing zoning and planning standards. The legislature recently expanded and strengthened the HAA's provisions, recognizing that the critically low housing supply in the state threatens the economic, environmental, and social quality of life in California (California Government Code, Section 65589.5[a][2][A]–[L]).

The HAA limits a local government's ability to deny, reduce the density of, or make infeasible housing development projects of all income levels, including mixed-use projects, that are consistent with objective local development standards (California Government Code, Section 65589.5[a][2][K], [h], [j]). A housing development project that meets all objective standards, except those lawfully modified by a DBL concession and/or waiver, may only be denied or approved at a lower density if the City makes written findings, supported by a preponderance of evidence in the record, that there is a specific, adverse impact upon public health or safety, and mitigation of the adverse impact is not possible (California Government Code, Section 65589.5 [j][1]–[j][4]).

In addition to limiting the denial of housing projects, the HAA establishes when a project application is "deemed complete," contains early vesting provisions, and includes application streamlining and processing provisions (California Government Code, Section 65589.5[d][5], [h][5] and [9], and [j][1]). The HAA further limits the imposition of development conditions (California Government Code, Section 65589.5[d], [h][7], and [i]).

Housing Crisis Act of 2019 (Senate Bill 330)

Enacted in 2019, Senate Bill (SB) 330 was passed to address the ongoing housing crisis in the state. With SB 330, the legislature declared a statewide housing emergency, which Senate Bill 8 (SB 8) extended to remain in effect until January 1, 2030. SB 330 restricts the types of ordinances and policies that can be applied to housing developments and establishes a preliminary application process to help standardize and expedite reviews (California Government Code, Section 65589.5[o], 65941.1, 65943). It also imposes deadlines to ensure timely processing of housing entitlements, limits the number of public hearings for projects, and prohibits a "net loss" of existing housing units (California Government Code, Section 66300[b][1][A], [d], 65905.5, 65950).

SB 330 also specifies that receipt of a density bonus increase, including associated incentives/concessions and waivers, does not constitute a valid basis for finding a project inconsistent with applicable plans and standards. (California Government Code, Section 65905.5[c][1], see also, Section 65589.5[j][3]). Further, it prohibits jurisdictions, including the electorate by initiative or referendum, from enforcing limitations or caps on housing development. (California Government Code, Section 66300[b][1][B] and [D]).

~~4.10.2.1~~4.10.2.2 Local

Multiple Species Conservation Program Plan

The proposed project is within the 900-square-mile (582,243-acre) limits of the Final MSCP Plan study area in southwestern San Diego County. The Final MSCP Plan is a multi-jurisdictional habitat conservation planning program that involves portions of the unincorporated County, 10 additional city jurisdictions, and several special districts. Local jurisdictions and special districts implement the Final MSCP Plan for their respective portions through subarea plans. An objective of the MSCP is to conserve a connected system of biologically viable habitat lands in a manner that maximizes the protection of sensitive species and precludes the need for future listings of species as threatened or endangered. The Final MSCP Plan identifies an MHPA, or area within which the permanent MSCP Preserve would be assembled and managed for its biological resources. The Final MSCP Plan targets 171,917 acres in the MHPA for conservation (City of San Diego 1998). A total of 85 plant and wildlife species are "covered" by the Final MSCP Plan. The MSCP Plan Final EIR/Environmental Impact Statement identifies "Vegetation Community Conservation Target Areas" for conservation by subarea. A total of 2,067 acres are expected to be conserved in the Santee Subarea. With approval of each subarea plan and corresponding implementing agreement, each participating local jurisdiction receives permits or authorization to directly impact or "take" MSCP covered species. The MSCP covered species include species listed as endangered or threatened by the federal Endangered Species Act or California Endangered Species Act, as well as unlisted species (City of San Diego 1998). Table 3-5 in the Final MSCP Plan provides a list of the 85 regional MSCP covered species.

San Diego County Airport Land Use Compatibility Plans

The San Diego County Regional Airport Authority (Authority) is committed to protecting the safety and welfare of the general public and the ability of airports to operate now and in the future. One of the Authority's responsibilities is to serve as the Airport Land Use Commission (ALUC) for the County.

The ALUC is responsible for adopting Airport Land Use Compatibility Plans (ALUCPs) for 16 public use and military airports in the County. ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport, as well as the public in general. ALUCPs focus on a defined area around each airport known as the AIA. The AIA is composed of noise, safety, airspace protection and overflight

factors, in accordance with guidance from the California Airport Land Use Planning Handbook published by the California Department of Transportation, Division of Aeronautics. The project site is located in the vicinity of two airports: MCAS Miramar and Gillespie Field. The San Diego County ALUC has adopted ALUCPs for each airport. The project site is subject to the land use compatibility policies and development criteria within AIAs (SDCRAA 2010, 2011).

San Diego Forward: The Regional Plan

The San Diego Association of Government's (SANDAG's) San Diego Forward: The Regional Plan (Regional Plan) is a regional transportation and sustainability plan that aims to provide a blueprint for a more livable, equitable, and innovative future (SANDAG 2015). It combines and updates two previous plans, the Regional Comprehensive Plan and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), into one document that looks toward 2050. The 2050 RTP lays out a plan for investing an estimated $214 billion in local, state, and federal transportation funds expected to come into the region over the next 40 years. In addition, the RTP forecasts that 388,436 new residences would be required by 2050 to accommodate a 40 percent increase in the regional population. Along with the 2050 RTP, the SANDAG Board of Directors adopted the SCS as required by Senate Bill 375. The SCS details how the region will reduce greenhouse gas emissions to state-mandated levels over time. The Regional Plan covers a broad range of topics including air quality, borders and tribal nations, climate change, economic prosperity, emerging technologies, energy and fuels, habitat preservation, healthy communities, public facilities, shoreline preservation, transportation, and water quality. The Regional Plan strategies are to focus on job growth and housing in urbanized areas with existing public transportation options, preserve open space, invest in a transit network that caters to everyone and includes many options, reduce greenhouse gas emissions, and address housing needs for all economic segments of the population, and to implement The Regional Plan through incentives and collaboration.

Santee General Plan

Divided into nine elements, the Santee General Plan is a statement of intent by the City 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. A summary of each element is provided below.

Land Use Element

The Land Use Element is intended to be the guide to the ultimate pattern of development in the community. It specifies the location, type, and amount of housing, commercial services, industrial uses, parks and public facilities, and open space that would compose the City at buildout. The Land Use Element provides goals, objectives, and policies that guide City decision makers in directing future growth and development and also regulates the types of land uses and land use intensities

within the City (City of Santee 2003). Land uses identified in the Santee General Plan are shown on Figure 4.10-1.

The project site is designated as Planned Development (PD). This designation provides for mixed-use development potentially including employment parks, commercial, recreational, and various densities of residential development. ~~Specifically, the Santee~~ The Santee General Plan provides that Fanita Ranch "represents an area of tremendous development potential" (City of Santee 2003). "The Ranch also is the only remaining area in the City where significant numbers of move-up housing can be built. A good supply of move-up housing is not only needed to provide opportunities for existing residents, but is also a factor in attracting high technology and office users to the City's planned office and technology parks" ~~establishes the Fanita Ranch property as an area for special study under Implementation Objective 8.2, Areas for Special Study, which provides 16 Guiding Priciples for the development of the project site. The 16 Guiding Principles for the project site in the current Land Use Element include the following~~ (City of Santee 2003).

The Santee General Plan establishes the Fanita Ranch property as an area for special study under Implementation Objective 8.2, Areas for Special Study, and provides "development guidelines" to act as a "framework" for developing the Special Study areas. For Fanita Ranch, the Santee General Plan states "planned development will be consistent with the Guiding Principles described below" (City of Santee 2003):

1. The Planned Development may include a comprehensively planned, high architectural quality business or office park. The business or office park shall include such uses as research and development, high technology uses, medical complex, executive headquarters or other similar office or business uses.
2. The Planned Development shall include a community focus (Fanita Center) which includes provisions for public parks, commercial development and institutional uses such as schools, fire station, branch library or branch post office.
3. The plan shall contain a mix of house sizes on lot sizes distributed as follows:
    - 6,000 sq. ft. lots – 20 percent of total lots
    - 10,000 sq. ft. lots – 20 percent of total lots
    - 20,000 sq. ft. lots – 60 percent of total lots or greater
4. The Land Use Plan, Administrative Plan, Circulation Plan, Trails and Open Space Plan, and Illustrative Site Plan shall be sensitive to the natural open space and the preservation of existing natural major land forms. The purpose of this requirement is to protect the major ridgeline and viewshed amenities, to minimize erosion, provide for public safety, protect natural resources and to establish site specific design standards which provide for development in harmony with the environment. The planned development will utilize contour grading techniques which are consistent with these objectives while providing opportunities for creative product design.

5. Other than within the northeastern sector of the site, the General Plan guidelines for hillside development should be used as the basis of the planned development's conceptual grading. Consideration may be given to permit grading of isolated steep slopes or along transition edges of steep slopes. Mass terracing should be avoided in favor of individual pad grading, wherever possible.
6. The plan may consider alternative residential design and grading requirements which are sensitive to the existing topography and out of the City's viewshed.
7. A southern portion of Fanita Ranch, primarily southerly of the SDG&E [San Diego Gas & Electric Company] power line, shall be identified as a regional park and contain no less than 400 acres.
8. The Planned Development should, subject to population demand, contain mini-parks, neighborhood parks, and two community parks. Dedication of a Sports Park, (accessed by Carlton Hills Boulevard), to the City of Santee will fulfill the requirements of one community park.
9. The plan shall contain a championship level, minimum 6,800-yard, par 70-75, 18-hole golf course, including support facilities. A hotel/conference complex shall be included in conjunction with the golf-course facility. An alternative plan may also be designated which, in lieu of a golf course and hotel/conference facility, includes a recreational facility based around a man-made lake, using non-reclaimed water, and which is approximately 200 acres in area.
10. The Planned Development shall include the extension of Fanita Parkway along the western boundary of the property.
11. The Planned Development shall include the extension of Cuyamaca Street into the site, connecting with Fanita Parkway.
12. Additional circulation facilities for the planned development areas shall be considered. The traffic and phasing analysis shall specifically address the following elements:
    a. Extension of Magnolia Avenue north and west to connect with Cuyamaca Street extension.
    b. The provision of a connecting road between the project and State Route 67.
    c. The extension of Carlton Hills Boulevard from its present terminus northward through the site to the developed area.
    d. The participation in and extension of Mast Boulevard east and/or west to connect with State Highways 67 or 52 and Mission Gorge Road.
    e. A four-lane surface street (Fanita Parkway) along the western boundary.
13. The Planned Development shall include a Comprehensive Trails Element designed to link with the proposed trails outside the Fanita Ranch, which is consistent with the objectives and standards set forth within the City's adopted Trails Element to the General Plan. Access to Sycamore Park shall be provided to Santee residents.

14. The Planned Development shall include a Comprehensive Implementation Element which shall consist of:

    a. A cost revenue assessment.
    b. Identification of required public improvements.
    c. A phasing plan for the public improvements and land use.
    d. A financing plan for the public improvements.
    e. A Development Agreement.

    Regarding phasing, all public improvements and land uses shall be phased according to detailed phasing plan as mentioned above (14.3). Public improvements shall be constructed prior to or simultaneously with their projected need. The plan shall contain performance standards or other measurements for determining the timing for all public improvements. Performance standards may include any appropriate means of measurement to determine when a given public improvement is deemed necessary by the City. Private land uses shall be phased to insure that land uses deemed desirable by the City (i.e. golf courses, estate units, executive units, etc.) will be included within the earliest phases of the Fanita Ranch.
15. The Fanita Ranch area shall not be subdivided (except for the Sports Park property) until a Planned Development is adopted by the City of Santee.
16. To ensure that proposed development is appropriate for a given, site, the Planned Development shall contain schematic or illustrative development plans which show prototype circulation systems and residential product types for each area designated by residential development.

Housing Element

The Housing Element of the Santee General Plan is designed to provide the City 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. The Housing Element 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. Fanita Ranch is identified in the Credits Towards the RHNA section of the Santee General Plan Housing Element (Table 34, RHNA Credits and Remaining Need) as providing for at least 2,949 housing units, including 435 moderate and 2,514 above-moderate income housing units, if developed with a school and up to 3,008 housing units if developed without a school (City of Santee 2022a).

Mobility Element

The Mobility Element is intended to guide the development of the City'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. 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; objectives and policies to meet those needs; and an implementation plan (City of Santee 2017).

Recreation Element

The Recreation Element is a permissive element adopted by the City to address recreation resources and facilities in the City. The purpose of this element is to identify park and other recreational resources that exist within the City and to suggest ways in which these resources can be preserved or enhanced. This element discusses existing conditions and future recreational needs (City of Santee 2003).

Trails Element

The Trails Element is a permissive element adopted by the City to identify the location and availability of trails in the City. The purpose of this element is to identify and plan for the City'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 2003).

Conservation Element

The 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 human-made resources and to encourage their wise management in order to assure their continued availability for use, appreciation, and enjoyment (City of Santee 2003).

Noise Element

The purpose of the 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 are addressed as well (City of Santee 2003).

Safety Element

The purpose of the Safety Element is to reduce loss of life, injuries, and damage to property resulting from natural and human-caused public safety hazards, including flooding, geologic and seismic hazards, fire, traffic hazards, and crime. The Safety Element also identifies plans and programs for emergency response (City of Santee 2003).

Community Enhancement Element

The 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 and provides guidelines to achieve such aims (City of Santee 2003).

City of Santee Zoning Ordinance

The City of Santee Zoning Ordinance is consistent with the Santee General Plan and is the primary implementation tool for the Land Use Element. Zoning regulations for the City are adopted and established to serve the public health, safety, and general welfare and to protect the physical, social, and economic stability for residential, commercial, industrial, and other land uses in the City to assure its orderly and beneficial development. The Zoning Ordinance and Map identify specific types of land uses, intensity of uses, and development performance standards applicable to specific areas and parcels of land within the City. According to the Zoning Ordinance Map, the project site is zoned Planned Development (PD). This designation provides mixed-use development potential including employment parks, commercial, recreational, and various densities of residential development. This designation is intended for select properties within the City where a variety of development opportunities may be viable and where the City wishes to encourage innovative and high-quality development. Allowable uses and development standards in each PD District shall be as established through a Development Review Permit consistent with the guidelines contained in the Zoning Ordinance.

Section 13.26.010 of the Zoning Ordinance contains the City's density bonus provision. It states, "The City implements the housing element of the General Plan; Sections 65915 through 65918 of the California Government Code; and, in accordance with those general regulations, provides incentives to developers for the production of housing affordable to lower income households, moderate income households and senior citizens."

City of Santee Essential Housing Program – Urgency Ordinance No. 592

On August 25, 2021, the City adopted Urgency Ordinance No. 592, an Essential Housing Program to boost housing production and improve housing affordability in the City resulting from the statewide and local housing deficit (City of Santee 2021). In enacting Urgency Ordinance No. 592,

a Citywide housing emergency was declared to be in effect in the City until August 25, 2026. Among the reasons for adopting Urgency Ordinance No. 592 were soaring home purchase and rental prices in the City, significant cost burden experienced by City residents, stymied housing production falling short of the City's Regional Housing Needs Assessment (RHNA) allocation, aging housing stock, and lower than optimal vacancy rates. The Essential Housing Program addresses the current housing emergency by expediting and incentivizing the construction of new housing projects that meet specific criteria in order to improve the housing supply and keep pace with housing demand. Under the program, projects that meet the specified criteria set forth by the City Council are deemed to be in compliance with the Santee General Plan, including the Land Use Element and Housing Element, and do not require an amendment to the Santee General Plan, rezone or other legislative act to proceed under the Essential Housing Program.

In response to the trial court's ruling concerning the proposed project, the City on February 12, 2025, amended Urgency Ordinance No. 592, the Essential Housing Program, to address deficiencies identified in the ruling. The urgency ordinance has been amended to clarify any ambiguity surrounding the authority, intent, and implementation of the program. The amendment explicitly affirms that the City, in accordance with the DBL, California Government Code, Section 65915(n) and (r), is empowered to grant concessions, waivers, and density bonuses for housing projects that further City housing objectives but that exceed or may not meet the strict requirements of the DBL. Further, the amendment confirms that a project certified as an Essential Housing Project under the program through the use of waivers, concessions, and/or incentives, as applicable, shall be deemed both in compliance and consistent with the General Plan Land Use Element and Housing Element and shall not require an amendment to the General Plan, an amendment to a Specific Plan, a Rezone, or other legislative act.

4.10.3 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the proposed project would have a significant impact on land use if it would:

- **Threshold 1:** Physically divide an established community.
- **Threshold 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.

4.10.4 Method of Analysis

This section discusses and analyzes potential land use conflicts of the proposed project in relation to the physical division of an existing community or conflicts with existing land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The analysis considers whether the proposed project would result in a physical division of an established community by constructing physical barriers or obstacles to circulation that would

restrict existing patterns of movement in the City or surrounding area. It also analyzes the proposed project's consistency with land use plans, policies, or regulations. A review of applicable land use plans, policies, and regulations was conducted. Those that were adopted for the purpose of avoiding or mitigating an environmental effect were considered for land use compatibility with the proposed project. Regardless of the ultimate development on the proposed school site (school or residential), the impacts to land use would be the same due to similar overall site buildout. Therefore, the following analysis adequately addresses both the preferred land use plan with school and the land use plan without school.

4.10.5 Project Impacts and Mitigation Measures

4.10.5.1 Threshold 1: Physical Division of an Established Community

Would the proposed project cause a significant environmental impact by physically dividing an established community?

Impact: The proposed project would not physically divide an established community.

Mitigation: No mitigation is required.

Significance Before Mitigation: Less than significant.

Significance After Mitigation: Less than significant.

Impact Analysis

Division of an established community occurs as a result of physical features that create a barrier to easy and frequent travel between two or more constituent parts of the community, or block existing connections in an established community. New highways, major roadways or utility corridors that bisect a neighborhood could result in the physical division of an existing community if design features do not promote connections between the bisected areas.

The proposed project does not contain any components that could result in dividing an established community. The project site is an undeveloped area located in the City's boundary. As previously discussed, areas directly north are currently undeveloped, though they are designated as Rural Lands (RL-40) (one residential unit per 40 acres) and Open Space (Conservation) by the San Diego County General Plan and zoned Agriculture (A70) and Specific Plan (S80). Beyond that, north of the project site and west of SR-67 lies the 2,272-acre Goodan Ranch/Sycamore Canyon County Preserve. Areas northeast include undeveloped hillsides and Slaughterhouse Canyon, where active mining operations take place. East of the project site is an unincorporated rural residential subdivision known as Eucalyptus Hills. Existing detached single-family residences in the Carlton Hills neighborhood are south of the project site. The Santee Lakes Recreation Preserve is southwest of the project site and MCAS northwest of the project site.

Proposed roadways would connect, rather than separate, the project site from established communities in the vicinity. A proposed extension of Fanita Parkway and Cuyamaca Street would connect the project site to the existing residential development to the south. The proposed project also proposes to

construct Magnolia Avenue from its current terminus to the extension of Cuyamaca Street just south of the project site.

Additionally, people have historically taken informal access through the proposed project for active and passive recreation. Implementation of the proposed project would formalize permanent public access trails, trailheads, and staging areas. The proposed project proposes more than 35 miles of multimodal public trails allowing access for pedestrians and bicyclists throughout the site and providing connections to the City center and regional trails. Thus, the proposed trail system would provide enhanced connectivity to existing trails in and near the project site. The proposed project would not result in the physical division of an established community. Impacts would be less than significant.

Mitigation Measures

The proposed project would have a less than significant impact; therefore, no mitigation is required.

4.10.5.2 Threshold 2: Conflict with Land Use Plans, Policies, or Regulations

Would 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: The proposed project would not conflict with applicable land use plans, policies, or regulations.

Mitigation: No mitigation is required.

Significance Before Mitigation: Less than significant.

Significance After Mitigation: Less than significant.

Impact Analysis

The review of local land use plans, including the ALUCPs for MCAS Miramar and Gillespie Field, SANDAG's Regional Plan, the Santee General Plan, and the City's Zoning Ordinance, has indicated that the proposed project would be generally ~~consistent with the implementation of these plans, as summarized below.~~ not in conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as summarized below.

Mere inconsistency with a plan, policy, or regulation does not mandate a significance finding. The conflict must "cause a significant environmental impact" due to a conflict with a policy or regulation "adopted for the purpose of avoiding or mitigating an environmental effect" (California Public Resources Code, Section 21083; CEQA Guidelines 15063[a]).

San Diego County Airport Land Use Compatibility Plans

The project site is located in the vicinity of two airports: MCAS Miramar and Gillespie Field. The ALUCPs for each airport establish land use compatibility policies and development criteria for new development within AIAs to protect these airports from incompatible land uses and provide the City with development criteria that would allow for the orderly growth of the areas surrounding the airport.

Compatibility concerns addressed by the ALUCPs include noise, safety, airspace protection, and overflight. The project site abuts the easterly property line of the MCAS Miramar. The entire project site is within the Federal Aviation Regulations, Part 77, Outer Boundary, which establishes standards and Federal Aviation Administration notification requirements for potential hazards to use of navigable airspace. The easterly portions of the project site are in a High Terrain zone, which is an area of land in the vicinity of an airport where the ground is above a surface regulated by Federal Aviation Regulations, Part 77. However, only a small northerly portion of the site falls in Review Area 2 of the AIA. The portion of the site in Review Area 2 would be dedicated as Habitat Preserve and would not be developed, and the remainder of the project site is outside of any AIA. Therefore, the proposed project would not be subject to any land use or development restrictions. In addition, the areas proposed for development fall outside of any Overflight Zones and are not subject to overflight-related disclosure or notification requirements (SDCRAA 2011).

The project site is north of Gillespie Field. Southerly portions of the site are within the Federal Aviation Administration Height Notification Boundary. The proposed Habitat Preserve and Special Use area are within this notification boundary. Within this boundary, the Federal Aviation Administration is required to 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. The Special Use area also falls in the Review Area 2, which requires limitations on the height of structures. Review Area 2 also requires overflight notification documents for residential uses; however, residential uses are not permitted in the Special Use area, except for one caretaker unit. If a caretaker unit is proposed, notification in accordance with the Review Area 2 requirements would be made. The development standards for the Special Use area consider the site's relationship to Gillespie Field and adjacency to off-site neighbors. Height in the Special Use area would be limited to conform to the Gillespie Field ALUCP. Buffers would be required adjacent to existing residences off site to preserve privacy (SDCRAA 2010). Therefore, the proposed project would be consistent with the ALUCPs for MCAS Miramar and Gillespie Field.

San Diego Forward: The Regional Plan

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. The five building blocks include the following (SANDAG 2015):

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 Demand Management, or TDM) 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.

The building blocks and strategies aim to reduce greenhouse gas emissions through a land use pattern that accommodates the region's future employment and housing needs and protects sensitive habitats, cultural resources, and resource areas. SANDAG developed 2020 and 2035 land use pattern models that accommodate 79 percent of all housing and 86 percent of all jobs in the urban area. More than 80 percent of new housing in the region is anticipated to be attached multi-family. The greatest employment density and building intensities would be in existing employment centers. The land use pattern also preserves approximately 1.3 million acres of land, which is more than half the region's land area. These open space lands include habitat conservation areas, parks, steep slopes, farmland, floodplains, and wetlands.

The proposed project proposes Village Center, Medium Density Residential, Low Density Residential, and Active Adult land use designations that would allow for a diversified mix of housing types. Additionally, the proposed development would be clustered into three villages to preserve approximately 63 percent of the site as Habitat Preserve to maintain core habitat identified in the Final MSCP Plan, preserve known wildlife corridors, and maintain a contiguous and connected open space system, which would help implement the first building block. By clustering compact, walkable, sustainable, low-impact development in strategic locations that minimize ecological impacts, development of the proposed project would allow for the restoration of sensitive habitat areas and management of the Habitat Preserve. Implementation of the proposed project would include the establishment of a formal management entity and a management plan to monitor and protect biodiversity. Open space corridors between the villages would preserve connectivity and allow for continued wildlife movement through the site. Wildlife crossings at roadways would be designed to support the safe and efficient movement of wildlife. In addition, existing drainages between the villages would allow for revegetation and restoration of these important features, which provide habitat and connectivity for wildlife.

The proposed project's mobility plan focuses on reducing the number and length of vehicle trips and providing alternatives to fossil fuel-powered vehicle use, which would help implement the second building block. This would be achieved through organizing land uses to locate services and goods close to residences and optimizing circulation systems to create direct, efficient, safe, and comfortable routes for a variety of transportation modes. The proposed project land uses are designed to meet the daily needs of the project residents to minimize trips outside the project site. Emphasis is placed on encouraging a transportation network that generate fewer emissions, such as walking, biking, electric vehicles, transit, and ridesharing. A TDM Plan has been prepared to support alternative modes,

manage shared facilities to optimize transportation modes, implement and support appropriate advanced technologies, and reduce greenhouse gas emissions (see Appendix N). The TDM Plan considers community programs to support and encourage ridesharing, alternative modes, and other strategies to reduce single-occupancy vehicle use, which would help implement the third and fourth building blocks. Implementation of the TDM Plan would be required by Mitigation Measure AIR-6 in Section 4.2, Air Quality. Refer to Section 4.2 for a more detailed description of the TDM measures for the proposed project.

The proposed project includes a Complete Streets system that supports various modes of transportation and offers alternatives to single-occupancy vehicle travel. Streets on the project site are designed as a system of Complete Streets that safely accommodate and support multiple user types, including motorists, pedestrians, bicycles, and transit riders in an effort to manage the transportation system. The Fanita Ranch Development Plan establishes the street designs within the boundaries of the project site. Street improvements associated with development on the project site include the extension of existing streets and the construction of a new internal systems of public and private streets. The proposed project establishes a network of streets of varying design capacities tailored to meet the unique concepts of the three villages. Additionally, the proposed project street designs address safety, aesthetics, and functionality, as well as site constraints.

The proposed project would offer sustainable transportation features that would reduce the number of vehicle trips, reduce emissions, and improve the overall mobility of people in the community, all of which would help implement the fifth building block (innovative pricing policies) of the Regional Plan. One proposed mobility feature is a bicycle circulation network throughout the community through a combination of on-street bike lanes and off-street multi-purpose trails. Bicycle trails would be designed for both recreation and to provide direct access between the villages. Another project feature is a project layout that promotes walkability and wellness. The proposed project would provide direct connections to multiple destinations that shorten the routes and allow walking to be an efficient and viable method of travel. The project proposes two pedestrian bridges that would provide direct connections across the two drainages in Fanita Commons to shorten the walking distance. The bridge that would traverse the northerly drainage would provide convenient access between the Active Adult neighborhood and the Community Park. The bridge that would traverse the southerly drainage would connect Orchard Village to the school, Community Park, and Fanita Commons. Additionally, every street on the project site would include a sidewalk or multi-purpose trail to accommodate pedestrian travel. Trails along the northerly and southerly drainages would also offer pedestrian connections between the school, the Farm, and the Active Adult neighborhood with minimal interruptions from vehicular traffic. The proposed project would include a pedestrian and bicycle mobility system consisting of sidewalks, trails, and bikeways throughout the proposed project, providing linkages between neighborhoods to other key land uses.

The proposed project supports the Regional Plan by proposing a land use pattern and TDM strategies that would accommodate the region's future employment and housing needs and protect sensitive habitats, cultural resources, and resource areas. Therefore, the proposed project would be consistent with the strategies and objectives of the Regional Plan.

Multiple Species Conservation Program

As discussed in Section 4.3, Biological Resources, the proposed land use plan would be consistent with the Fanita Ranch Subunit of the City's Draft MSCP Subarea Plan. The proposed project would adhere to or exceed conditions of coverage and mitigation/conveyance requirements for covered projects as defined in the City's Draft MSCP Subarea Plan (City of Santee 2018). The Santee General Plan, including its Conservation Element and the Natural Communities Conservation Plan Enrollment Agreement executed by the City, requires that any development in the City comply with the City's Draft MSCP Subarea Plan. Refer to Section 4.3 of this EIR for a full discussion and analysis of the proposed project's consistency with the City's Draft MSCP Subarea Plan.

Santee General Plan

The Santee General Plan provides the framework for the City's long range planning vision. The project site is designated for Planned Development (PD), which provides for the following:

> Mixed-use development potential including employment parks, commercial, recreational, and various densities of residential development pursuant to a development plan and entitlements being approved by the City Council. This designation is intended for select properties within the City where a variety of development opportunities may be viable and where the City wishes to encourage innovative and very high quality development in a manner which may not be possible under standard land use designations and their corresponding zones.
>
> While the PD designation does not, in itself, limit the extent or mix of development to occur, other provisions within the General Plan may do so for particular properties. All development which takes place pursuant to the Planned Development designation shall be consistent with the General Plan.

The proposed project provides for mixed-use development of employment, commercial, recreational, and various residential densities, including senior housing, consistent with the framework for development set forth by the Santee General Plan PD designation.

~~Further, t~~The proposed project would develop ~~implement development~~ consistent with ~~the 16~~ Guiding Principles~~., set forth above, for the project site.~~ The proposed project would include business and office uses in the Village Center and include a community focus including public parks, commercial, school, a fire station, and other uses~~.~~ (Guiding Principles 1 and 2). The

proposed project would provide a range of residential densities, including Low Density Residential, Medium Density Residential, and Active Adult. (Id. and Guiding Principle 3). The proposed project would be developed sensitive to natural open space and major landforms: 1,650.4 acres of the site would be preserved as Habitat Preserve. (Guiding Principle 4). The Habitat Preserve would include hillsides with steep slopes to minimize landslide and mudslide hazards and to protect key visual resources. (Guiding Principles 4–6).

The proposed project would provide approximately 78 acres of public parklands for active and passive recreation (including sports fields and parks) and private parklands and 4.5 acres of trail lands consisting of perimeter trails and the Stowe Trail connections planned on the project site, totaling 82.5 acres. (Guiding Principles 2, 4, 7, and 8). Mini-Parks, Neighborhood Parks, a Village Green, Linear Parks, and Community Parks would be included. (Guiding Principle 8). The proposed project would not locate the Sports Park to be accessed by Carlton Hills Boulevard (Guiding Principle 8). However, the principle does not mandate the Sports Park must be provided or that access must be by Carlton Hills Boulevard. It merely states that the PD "should, subject to population demand" contain the variety of parks and that dedication of a "Sports Park, (accessed by Carlton Hills Boulevard), to the City of Santee would fulfill the requirements of one community park" (Guiding Principle 8). This is accordingly not considered a conflict between the proposed project and Guiding Principle 8. Moreover, no significant environmental impact is caused by not constructing a sports park accessed by Carlton Hills Boulevard.

The proposed Fanita Ranch Development Plan contains a comprehensive pedestrian and bicycle trail system that provides connectivity within and between the villages and with the adjacent regional trails and local trails that connect to surrounding open space areas, residential neighborhoods, parks, and the Santee Town Center to the south. (Guiding Principles 4 and 13). Multi-purpose trails would be within the street rights-of-way along Fanita Parkway and Cuyamaca Street, which would support pedestrian and bicycle travel. The multi-purpose trail along Cuyamaca Street would extend south off site to connect to the Santee Town Center and the San Diego River as part of the north–south regional corridor. Trail access in the Habitat Preserve would be subject to the requirements and provisions of the Public Access Plan (provided in Appendix D, Biological Resources Technical Report, of this EIR) and the City's Draft MSCP Subarea Plan.

The project includes an extension of Fanita Parkway along the western boundary of the property, an extension of Cuyamaca Street into the site, the Magnolia Avenue extension, and additional circulation improvements. (Guiding Principles 10–12). The Fanita Ranch Development Plan includes a comprehensive implementation chapter (Chapter 10) identifying public improvements, phasing, financing, and other plans according to projected need. (Guiding Principle 14). The site will not be subdivided until the Fanita Ranch Development Plan is adopted by the City. Chapters 4 and 6 of the Fanita Ranch Development Plan also include illustrative plans showing prototype

circulation systems and residential product types~~.~~ (Guiding Principle 16). The proposed project does not provide a development plan with the following lot sizes referenced in Guiding Principle 3:

- 6,000 sq. ft. lots – 20 percent of total lots
- 10,000 sq. ft. lots – 20 percent of total lots
- 20,000 sq. ft. lots – 60 percent of total lots or greater

The proposed project would accordingly conflict with this principle.~~include a golf course or lake, meet minimum lot size requirements, provide a dedicated Sports Park accessed by Carlton Hills Boulevard, or include a Development Agreement. Overall, the project is generally consistent with the 16 Guiding Principles. Moreover, as discussed below, the project is consistent with the Santee General Plan pursuant to Urgency Ordinance No. 592.~~

~~Urgency Ordinance No. 592, the City's Essential Housing Program, provides an alternative process to boost housing production and improve housing affordability for housing projects that meet specified criteria through 2026 (City of Santee 2021). Under the program, projects that follow the procedures and meet the strict requirements of the program are deemed to be in compliance with the Santee General Plan, including the Land Use Element and Housing Element, and do not require an amendment to the Santee General Plan or other legislative act for approval. Specifically, by complying with the City's Essential Housing Project Credits Assessment Guide and Checklist, Essential Housing Projects will have demonstrated Santee General Plan consistency by furthering the objectives and policies of the plan while not obstructing their attainment (Appendix R).~~

~~Urgency Ordinance No. 592 controls any other City plan or ordinance in the event of a conflict, with its interpretation being afforded the fullest possible weight to the interest, approval, and provision of housing (Appendix R). Certification as an Essential Housing Project is available for use to expedite (1) any new application for a Housing Development Project, (2) any Housing Development Project currently under City review, or (3) any approved, entitled, and/or permitted Housing Development Project not yet built by the date application for certification is made.~~

~~An application under the Essential Housing Program was submitted for the proposed project in December 2021. On December 27, 2021, the City's Director of Development Services certified the proposed project as an Essential Housing Project based on the criteria adopted by the City Council (Appendix R).~~

~~As demonstrated by the December 27, 2022, certification, the proposed project would address the City's housing crisis by providing a mix of residential and nonresidential uses and a mix of housing types and sizes. A total of 2,949 housing units would be developed if the proposed project includes a school, or 3,008 units without a school, including 435 moderate-income units. The proposed project would also contribute up to $2 million for affordable housing.~~

~~Stringent environmental and Santee General Plan consistency criteria established by the Essential Housing Program would be met. The proposed project would implement mobility improvements, including bus stops, traffic calming, an up-to $300,000 contribution to relieve congestion on SR-52, and rideshare/carshare parking. Open space would be conserved. In addition to preserving 1,650.4 acres in the Habitat Preserve, the proposed project would provide at least $300,000 in funding for the management of City-owned natural open space and would plant at least 10 trees per acre of land to be developed. Water use would be reduced by connections to recycled or advanced treated water when PDMWD's East County Advanced Water Purification project is completed.~~

~~With regard to energy, air quality, and GHG emissions, the proposed project's residential units would be all-electric and would exceed Title 24 standards by all-electric residential development, implementing heat pump technology, increasing solar production, and expanding ventilation systems. Appliances would be Energy Star rated, electric vehicle chargers would be provided in the Village Center, and solar panels would be installed on accessory buildings and car ports. Wildfire safety would be ensured through implementation of fuel management zones and the Fire Protection Plan (FPP), among the many other measures set forth in the FPP and Wildland Fire Evacuation Plan (see Appendices P1 and P2).~~

~~Many miles of trails and sidewalks would be provided with the proposed project, and up to $300,000 would be provided to the City to fund additional improvements to trail facilities. Finally, the proposed project's extensive park and recreational facilities would exceed the Santee Municipal Code standards by at least 5 percent and would provide for multi-purpose playing fields and public recreational facilities for Citywide use. The certification of the proposed project based on the City's Essential Housing Project Credits Assessment Guide and Checklist demonstrates that the current development proposal for the project site addresses the City's immediate housing needs and furthers Santee General Plan objectives and policies. Therefore, the proposed project is deemed Santee General Plan consistent and does not require an amendment to the Santee General Plan or other legislative act for approval. The proposed Fanita Ranch Development Plan establishes a program for the comprehensive implementation of the project, including development guidelines and standards, which are imposed through a Development Review Permit process.~~

The proposed project's design condenses the previous development footprint to respect existing topography and preserve 1,650.4 acres of the site as habitat preserve. This approach is consistent with other Guiding Principles that encourage "creative product design" and "alternative residential design" as alternatives to conventional lotting across the site (Guiding Principles 4 and 6). There is no evidence that Guiding Principle 3 was adopted to avoid or mitigate an environmental effect. Greater density can increase certain impacts while decreasing others and providing much-needed housing. Here, the significantly reduced footprint of the proposed project avoids effects associated with a larger development footprint, such as increased impacts associated with grading, erosion,

biological resources, cultural resources, geological resources, construction emissions (including air quality and greenhouse gases), and other effects. Further, as noted by the California Legislature, "building more smaller homes with good access to schools, parks, and services, will provide the most immediate help with the lowest greenhouse gas footprint to state residents" (SB 330, Section 2[a][14]). Consequently, the proposed project's inconsistency with Guiding Principle 3 would likely not result in greater significant impacts overall in comparison to a project with larger lots spread over a larger development footprint in compliance with Guiding Principle 3. Rather, the compact footprint of the proposed project is likely to reduce, rather than increase, overall adverse environmental impacts (see Section 21083[b]).

The proposed project also would not include an 18-hole golf course or human-made lake with potable water, as outlined in Guiding Principle 9. Guiding Principle 9 was not adopted to avoid or mitigate any environmental effect but to provide amenities for the residents of the project and larger community. The inclusion of a golf course or lake would likely increase impacts on water supply, grading, erosion, biological resources, cultural resources, geological resources, construction emissions (including air quality and greenhouse gases), and other effects compared to the proposed project due to expanded grading and irrigation demands. The proposed project presents an environmentally superior alternative, featuring parks, trails, and recreational facilities, while preserving significant sensitive habitat in lieu of dedicating 200 acres to a golf course or human-made lake. Consequently, any conflict with Guiding Principle 9 would not result in a significant environmental impact.

The project's Development Plan includes a comprehensive implementation element (Chapter 10, Implementation) but does not incorporate a "Development Agreement" as specified in Guiding Principle 14(e). Development Plan Chapter 10 addresses issues normally included in a Development Agreement, including project phasing, financing, operation, maintenance, administration, implementation, modification, and monitoring. Additionally, the proposed project's conditions of approval and Mitigation Monitoring and Reporting Program are legally binding upon the developer and ensure the environmental effects of the project would be mitigated to the extent feasible. Therefore, the absence of a Development Agreement in the implementation plan would not create adverse environmental impacts for purposes of this threshold.

Moreover, a Development Agreement, as a contract between two or more willing parties, by its very nature is a subjective undertaking subject to negotiation. As such, Guiding Principle 14 is not an objective development standard as defined by the HHA (California Government Code, Section 65589.5[h][9]).

In summary, the Guiding Principles are intended as guidance for future development of a PD, and not as mandatory development requirements. The proposed project does not result in significant

environmental impacts due to conflicts with Guiding Principles specifically adopted to avoid or mitigate environmental effects.

Additionally, as outlined below, the proposed project does not conflict with these Guiding Principles because it is entitled to the DBL benefits and also has been certified as an Essential Housing Project under the City's Essential Housing Program, resulting in the waiver of conflicting Guiding Principles.

State Density Bonus Law

With the inclusion of 445 age-restricted senior units (55 years of age or older) within the Active Adult community, the entire proposed project is entitled to density bonus, waiver, and reduced parking benefits under the DBL (California Government Code, Section 65915[b][1][C], [e][1], [f][3][A], [p][1]; Civil Code Section 51.3[b][1], [4]).

The proposed project would develop an "Active Adult" neighborhood, which would provide approximately 445 "age-restricted residential uses in a variety of building types with densities ranging from 5 to 25 residential units per acre" (Section 3.3.1.4 of the Final Recirculated REIR). The project's 445 senior units far surpass the 35 needed to qualify for mandatory DBL benefits, including waivers of development standards (California Government Code, Section 65915[b][1][C], [e][1]).

The proposed project is seeking only waivers under the DBL. It does not require, and is not seeking, any bonus density market rate dwelling units under the DBL as there is no density limit at the site established in the General Plan or Zoning Ordinance. The site has been shown to accommodate the 2,949 to 3,008 units proposed by the project while preserving 1,650.4 acres (63 percent) in a Habitat Preserve, with waiver of development standards discussed below (California Government Code, Section 65915[o][6][A] and [B]).[1]

An agency must waive any development standard that will have the effect of physically precluding project construction at the densities and with the amenities proposed (California Government Code, Section 65915[e][1]). A "development standard" is defined as "a site or construction condition, including, but not limited to, a height limitation, a setback requirement, a floor area ratio, an onsite open-space requirement, a minimum lot area per unit requirement, or a parking ratio that applies to a residential development pursuant to any ordinance, general plan element, specific plan, charter, or other local condition, law, policy, resolution, or regulation that is adopted by the local government or that is enacted by the local government's electorate exercising its local

[1] Where no density unit-per-acre standard is provided, base density may be calculated by estimating the "realistic development capacity of the site based on the objective development standards applicable to the project" "excepting those that may be modified by a waiver or concession" (California Government Code, Sections 65915[o][6][A] and [B]). Further, a local agency may apply a limited selection of physical development standards to estimate development capacity so that they're permissibly applied to maximize housing. Base Density Calculation under Assembly Bill 2334 (California Density Bonus Law)

initiative or referendum power, whether that power is derived from the California Constitution, statute, or the charter or ordinances of the local government" (California Government Code, Section 65915[o][2]).

Agencies are "strictly limited in denying requested development standard waivers, … unless doing so would have a specific adverse impact on health or safety (as defined) which could not be mitigated" (California Government Code, Section 65915[e]).

Here, the proposed project is entitled to mandatory waivers of Guiding Principle 3 (lot size standards), and Guiding Principle 9 (approximately 200-acre golf course or lake amenity) because they would physically preclude construction of the project's 2,949 to 3,008 units, including the 445 age-restricted senior units, as designed and with the other amenities proposed (California Government Code, Section 65915[e][1], [o][2]). Waived development standards—Guiding Principles 3 and 9—are not "applicable" and the project may not be deemed inconsistent with the General Plan for any conflict with these principles (California Government Code, Section 65589.5 [j][3]). ["[T]he receipt of a density bonus, incentive, concession, waiver, or reduction of development standards pursuant to Section 65915 shall not constitute a valid basis on which to find a proposed housing development project is inconsistent, not in compliance, or not in conformity, with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision specified in this subdivision."].

Per the DBL, density bonus benefits cannot require a General Plan Amendment, Local Coastal Plan Amendment, Zoning Change, or other discretionary approval (California Government Code, Section 65915[e][1], [f][5], [j][1]). With these mandatory DBL waivers, the proposed project is consistent with the Santee General Plan and other applicable ordinances and requires no legislative action.

Essential Housing Program

The proposed project is also consistent with the Santee General Plan, including the Guiding Principles for the project site, pursuant to Urgency Ordinance No. 592, as amended on February 12, 2025. Urgency Ordinance No. 592, the City's Essential Housing Program, provides an alternative process to boost housing production and improve housing affordability for housing projects that meet specified criteria through 2026 (City of Santee 2021; Appendix S). Under the program, projects that follow the procedures and meet the strict requirements of the program are entitled to waivers from City development regulations, including Guiding Principles, as needed to develop at the density and with the amenities proposed, without the requirement for a General Plan amendment or other legislative act (California Government Code, Section 65915[f][5], [j][1], [n]; Appendix T).

Urgency Ordinance No. 592 controls over any other City plan or ordinance in the event of a conflict, with its interpretation being afforded the fullest possible weight to the interest, approval, and provision of housing (Appendix R).

An application under the Essential Housing Program was submitted for the proposed project in December 2021. On December 27, 2021, the City's Director of Development Services certified the proposed project as an Essential Housing Project based on the criteria adopted by the City Council (Appendix R). No changes have been made to the project which would impact or negate such certification. Note the Essential Housing Program is available to expedite (1) any new application for a Housing Development Project; (2) any Housing Development Project currently under City review; or (3) any approved, entitled, and/or permitted Housing Development Project not yet built by the date application for certification is made.

As demonstrated by the certification and project conditions, the proposed project would address the City's housing crisis by providing a mix of residential and nonresidential uses and a mix of housing types and sizes. A total of 2,949 housing units would be developed if the proposed project includes a school, or 3,008 units without a school, including 435 moderate-income units and 445 age-restricted senior units. The proposed project would also develop 150 low-and moderate-income units and contribute up to $2.6 million for affordable housing.

Stringent environmental and Santee General Plan consistency criteria established by the Essential Housing Program would be met. The proposed project would implement mobility improvements, including bus stops, traffic calming, an up to $300,000 contribution to relieve congestion on SR-52, and rideshare/carshare parking. Open space would be conserved. In addition to preserving 1,650.4 acres in the Habitat Preserve, the proposed project would provide at least $300,000 in funding for the management of City-owned natural open space and would plant at least 10 trees per acre of land to be developed. Water use would be reduced by connections to recycled or advanced treated water when PDMWD's East County Advanced Water Purification project is completed.

With regard to energy, air quality, and greenhouse gas emissions, the proposed project's residential units would be all-electric and would exceed Title 24 standards by all-electric residential development, implementing heat pump technology, increasing solar production, and expanding ventilation systems. Appliances would be Energy Star rated, electric vehicle chargers would be provided in the Village Center, and solar panels would be installed on accessory buildings and car ports. Wildfire safety would be ensured through implementation of fuel management zones and the Fire Protection Plan (FPP), among the many other measures set forth in the FPP and Wildland Fire Evacuation Plan (see Appendices P1 and P2).

Many miles of trails and sidewalks would be provided with the proposed project, and up to $300,000 would be provided to the City to fund additional improvements to trail facilities. Finally, the proposed project's extensive park and recreational facilities would exceed the Santee

Municipal Code standards by at least 5 percent and would provide for multi-purpose playing fields and public recreational facilities for Citywide use.

The certification of the proposed project based on the City's Essential Housing Project Credits Assessment Guide and Checklist demonstrates that the current development proposal for the project site addresses the City's immediate housing needs and furthers Santee General Plan objectives and policies. Therefore, the proposed project is deemed consistent with the Santee General Plan under the Essential Housing Program and does not require an amendment to the Santee General Plan or other legislative act for approval. Any Guiding Principles which would preclude the implementation of the project as proposed are not "applicable" to the project. Any conflict is also not considered an inconsistency with the General Plan or other regulations under state housing law (California Government Code, Section 65589.5[j][3], 65905.5[c][1]).

Consistency with Remainder of General Plan

Table 4.10-1 identifies the goals, objectives, and policies found in the various elements of the Santee General Plan that are relevant to the proposed project and provides an evaluation of the proposed project's consistency with them. Consistent with Appendix G of the CEQA Guidelines, only the goals, objectives, and policies adopted for the purpose of avoiding or mitigating an environmental effect are discussed.

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Land Use Element	
Applicable Objectives and Policies	
Objective 2.0: Allow for the development of a wide range of housing types in the City.	The proposed project would provide for development of a comprehensively planned community that includes a wide range of housing types and sizes, commercial uses, community amenities, and public services and facilities. The community would be supported by an interconnected open space and recreation system, which consists of approximately 1,650.4 acres designated Habitat Preserve, an array of active and passive parks and recreation facilities, an extensive network of walking and biking trails and internal open space areas. The community street system is designed to provide efficient circulation patterns and promote alternative modes of transportation. Parking requirements are included in the Fanita Ranch Development Plan to ensure that adequate off-street parking would be provided throughout the community. The Fanita Ranch Development Plan identifies an appropriate mix of building typologies under each land use designation. The Fanita Ranch Development Plan allows for innovative site planning techniques within each building typology to encourage diversity in residential product types, sizes, and designs, which would meet the housing needs of Santee residents and provide interesting street scenes within the community. The Village Center, Medium Density Residential, and Active Adult land use designations would allow for higher density residential development. These land use areas are located along main roadways of each village near cycling/walking trails, retail and services, parks and recreation facilities, and a school site. Therefore, the proposed project would be consistent with this objective and these policies.
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.	
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.	The proposed project would use, if implemented, purified water or advanced treated water provided by PDMWD through its East County Advanced Water Purification Program. Advanced treated water is a more cost-effective and efficient alternative to recycled water and provides a long-term solution for a sustainable local drinking water supply. The proposed project may use recycled water for construction purposes on a limited and seasonal basis. The Fanita Ranch Development Plan requires that infrastructure and utilities necessary to serve the community be provided prior to or concurrently with development. Impacts resulting from public utilities, if any, would be mitigated to the maximum extent possible in accordance with the mitigation measures identified in the EIR. Additionally, the proposed project includes a Conceptual Phasing Plan that would coordinate the provision of public facilities and services with the anticipated sequence and pattern of development. The four phases of development are conceptual and non-sequential and may occur concurrently. Phases may overlap or vary depending on market conditions. They may also be broken down into smaller sub-phases. Each
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**.**	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
	phase would likely take 2 to 4 years to complete. Construction is anticipated to begin in 2023 with a buildout of approximately 10 to 15 years. The backbone water and sewer improvement in the Special Use area would be included in Phase I, but the remainder of the Special Use area and adjacent mini-park may be developed at any time during project buildout. New utility lines serving the development would be placed underground. Therefore, the proposed project would be consistent with these policies.
Objective 6.0: Ensure that natural and man-induced hazards are adequately addressed in the location and intensity of development in the City.	Potential impacts of natural and man-induced hazards associated with development of the proposed project are addressed in this EIR in Sections 4.6, Geology, Soils, and Paleontological Resources; 4.8, Hazards and Hazardous Materials; and Section 4.18, Wildfire. The proposed project would incorporate appropriate design features and adhere to all applicable restrictions and requirements identified in the EIR to ensure that potential seismic, geological, flood, and wildland fire impacts are mitigated to below a level of significance. The proposed project's land use plan has been designed to avoid or mitigate potentially hazardous conditions on site, such as significant steep slopes and wildland fire hazards. The proposed project includes provisions to ensure that adequate law enforcement and fire protection services would be available to serve the community. Additionally, the Fire Protection Plan (FPP) (Appendix P1) establishes standards for fuel modification, building design and construction, and other pertinent infrastructure criteria that would reduce wildland fire risks to below a level of significance. The proposed project's consistency with the Santee General Plan's Safety and Conservation Elements' goals, objectives, and policies are further discussed in this table under the Safety and Conservation Elements sections. Therefore, the proposed project would be consistent with these policies.
Policy 6.1: The City shall utilize all mapped information, objectives, and policies contained in the Safety and Conservation Elements during the development review process.	
Policy 6.2: The City should promote the use of innovative site planning to avoid on-site hazards and minimize risk levels.	
Objective 7.0: Undertake development of large, contiguous, vacant, or underutilized parcels in a comprehensive manner.	The proposed project would develop the large, contiguous, vacant site into a comprehensive community with residential, commercial, civic, agricultural, and recreational land uses. Therefore, the proposed project would develop the area in a comprehensive manner and would be consistent with Objective 7.0.
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	The large, contiguous 2,638-acre project site would be under single ownership and contains habitats for sensitive resources that would be protected within the Habitat Preserve. In addition to the Habitat Preserve, the proposed project would include a balanced mix of residential, commercial, parks and recreational, agricultural, and open space uses that support economic growth and promote wellness and healthy living. The proposed project includes phased implementation of the development plan and would ensure that adequate public facilities, utilities, and services necessary to serve the

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
ownerships, the plan should apply to the total area of these ownerships. For smaller contiguous vacant or underutilized (i.e., less than 10 acres in area), a comprehensive planning process should be considered to allow for the comprehensive development of the land.	community's needs are in place prior to or concurrent with development to minimize impacts on the City. The proposed project would provide a comprehensive development plan for the project site. Approval of subdivision maps and improvement plans for areas on the project site would occur subsequent to the approval of the proposed project. Therefore, the proposed project would be consistent with these policies.
Policy 7.2: A comprehensive development plan shall be proposed prior to approving any subdivision of land or land development proposal.	
Objective 8.0: Minimize land use conflicts and maximize mutual benefits between adjacent land uses in the City.	Habitat on the project site has been severely degraded over the past few decades by illegal activities including trespassing, dumping, and off-road vehicle use. The proposed project includes a clustered compact, walkable, sustainable, low-impact development in strategic locations that minimize ecological impacts, development of the proposed project would allow for the restoration of sensitive habitat areas and management of the Habitat Preserve. Implementation of the proposed project includes establishment of a formal management entity and management plan to monitor and protect biodiversity. Furthermore, creating neighborhoods adjacent to a public trail system and providing community education programs about the area's natural resources would encourage community appreciation for nature, foster a sense of ownership and stewardship for the land, and encourage voluntary participation in preserving and maintaining these open spaces from further degradation. The proposed project would accommodate a mix of land uses that support economic vitality and provide for public services. Requirements and guidelines for community planning and site development are included in the Fanita Ranch Development Plan. The Fanita Ranch Development Plan would designate approximately 63 percent of the site as Habitat Preserve, which would be protected to allow for conservation and restoration of natural open space and habitats for sensitive plant and wildlife species. The proposed project would implement the applicable mitigation measures identified in the EIR to reduce potential direct or indirect impacts to sensitive biological resources. Therefore, the proposed project would be consistent with this objective and these policies.
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 8.5: 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 uses in adjacent areas and existing and planned land uses in the City.	Development on the project site would include residential, agricultural, and parks and open space uses. This would not result in the expansion of existing mining (e.g., Slaughterhouse Canyon) or any new mining operations north and northeast of the City. Therefore, the proposed project would be consistent with this objective and policy.
Policy 9.3: The City should oppose any new mining operations or expansion of currently approved mining operations to the north and northeast of the City that would conflict with planned development in Fanita Ranch.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Objective 11.0: Ensure that development in the City is consistent with the overall community character and contributes positively towards the City's image.	The proposed project would implement the Santee General Plan Community Enhancement Element by establishing community identity through incorporation of an agrarian theme and gateway/place-making elements into the overall community planning and design; accommodating a diverse collection of housing types and designs; providing roadway and trail connections to existing neighborhoods and open space areas within the City; and creating pedestrian-friendly streetscape that promotes walking and enhances the community aesthetics. The proposed project would provide site development standards and design guidelines for community design, landscaping, and architecture, which would provide guidance for future development to ensure that a high-quality community would be implemented. Therefore, the proposed project would be consistent with this objective.
Objective 12.0: Maintain the integrity and consistency of the General Plan	The proposed project would be developed consistent with the Santee General Plan, as detailed throughout this section.
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.	As discussed above, the site is designated PD, and there is no dwelling unit per acre standard or maximum residential density permitted at the site. With DBL waivers, incentives, and/or EHP certification, no General Plan Amendment is required or proposed. The proposed project also does not propose to change, alter, or increase the General Plan Residential Land Use categories to intensify any use or to change any residential designation to commercial or industrial, or vice versa. Therefore, no voter approval is required. Further, per Policy 12.4 and state law, such a requirement is preempted. The proposed project is entitled to mandatory waivers of development standards under the DBL, and the City cannot require a General Plan Amendment or other legislative action for such waivers (California Government Code, Section 65915 [f][5], [j][1]). In addition, SB 330, California Government Code, Section 66300(b)(1)(B)(i) and (b)(1)(D)(i)–(iii), provides the City may not, during the declared housing crisis, enact or enforce any provision that limits, caps, or imposes a moratorium on housing development, including mixed use development. Therefore, the proposed project would be consistent with this policy.
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.	The proposed project does not propose any change to slope criteria and minimum parcel sizes and lot averaging provisions. The project is entitled to mandatory waivers of development standards under the DBL, including the lot size Guiding Principle 3 (California Government Code, Section 65915[f][5], [j][1]). Therefore, for purposes of the proposed project, this policy does not apply. With DBL waivers, incentives, and/or the EHP certification, no General Plan Amendment is required or proposed. Therefore, the proposed project would be consistent with this policy.

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Policy 12.3: The City Council shall set any election required by this Objective to the next available general municipal election at no cost to the proponent of the land use change, or set a special election, the cost of which shall be borne by the proponent.	This objective is not directed toward reducing environmental impacts. See consistency evaluation for Policies 12.1 and 12.2 above. Therefore, the proposed project would be consistent with this policy.
Policy 12.4: The voter approval requirement of subsection (a) shall not apply where the General Plan amendment is necessary to comply with state or federal law governing the provision of housing, including, but not limited to affordable housing requirements. This exception applies only if the City Council first makes each of the following findings based on substantial evidence in the record: 1) a specific provision of state or federal law requires the City to accommodate the housing that will be permitted by the amendment; 2) the amendment permits no greater density than that necessary to accommodate the required housing; and 3) an alternative site that is not subject to the voter approval requirement in this Policy is not available to satisfy the specific state or federal housing law.	This objective is not directed toward reducing environmental impacts. See consistency evaluation for Policies 12.1 and 12.2 above. With DBL waivers, incentives, and/or EHP certification, no General Plan Amendment is required or proposed. Therefore, this policy does not apply. Such a voter requirement is also preempted by the DBL and SB 330. Additionally, as concerns the proposed project's EHP certification, refer also to Section 5 of Urgency Ordinance No. 592, which makes the findings set forth in this policy for Essential Housing Projects: The City Council finds that the adoption of this Ordinance is necessary to comply with state law governing the provision of housing, including but not limited to, Government Code sections 65583 and 65584 and additional affordable housing requirements, and is necessary to achieve the goals set forth in the City's Housing Element. The City Council finds that this Ordinance permits no greater density than is necessary to accommodate the required housing. The City Council finds that the criteria identified in the Essential Housing Program as establishing eligible Essential Housing Project sites have been narrowly tailored to the housing needs of the City, and alternative sites for Essential Housing Projects are not available to satisfy the requirements of state housing law. For each of these reasons, the proposed project would be consistent with this policy.
Housing Element	
Applicable Objectives and Policies	
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.	The proposed project would provide for a diverse mix of detached and attached housing types in densities ranging from high-density residential development in the Village Centers to Medium and Low Density Residential neighborhoods throughout the community. A variety of residence types and sizes would be offered, which would accommodate different types of households including families, multi-generational households, young singles, empty-nesters, seniors, and more. The proposed project would include an Active Adult land use designation area near the Fanita Commons Village Center, where community services would be located. The current Santee General Plan land use designation of the project site is
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.	
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.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
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.	Planned Development (PD), and the Housing Element identifies the project site to provide 2,949units with a school, or 3,008 units without a school, demonstrating that the site has been planned for residential growth by the City. The proposed project would include 435 moderate-income units consistent with the Santee General Plan Housing Element. The proposed project would provide an implementation program that addresses the phasing of public infrastructure improvements and services to ensure that public facilities and services would be available prior to or in conjunction with projected needs. The Phasing Plan would coordinate the provision of public facilities and services with the anticipated sequence and pattern of development. The four phases of development are conceptual and non-sequential and may occur concurrently. Phases may overlap or vary depending upon market conditions. They may also be broken down into smaller sub-phases. Each phase would likely take 2 to 4 years to complete. Construction is anticipated to begin in 2023 with a buildout of approximately 10 to 15 years. The backbone water and sewer improvement in the Special Use area would be included in Phase I, but the remainder of the Special Use area may be developed at any time during project buildout. Therefore, the proposed project would be consistent with this objective and these policies.
Mobility Element	
Applicable Goal, Objectives, and Polices	
Goal: A balanced, interconnected multi-modal transportation network that allows for the efficient and safe movement of all people and goods, and that supports the current and future needs of Santee community members and travel generated by planned land uses.	The proposed project would integrate land use and transportation planning to enhance smart growth development. Land uses would be organized to locate services and goods close to residences and optimize circulation systems to create direct, efficient, safe, and comfortable routes for a variety of transportation modes. Roadways on the project site would be designed as a system of Complete Streets that safely accommodate and support all users, including motorists, pedestrians, bicyclists, and neighborhood electric vehicles (NEV). Planned street improvements would include the extension of existing roadways (Fanita Parkway, Cuyamaca Street, and Magnolia Avenue) into the project site and the construction of new internal systems of public and private streets. On the project site, specially designed street sections would respond to the physical characteristics of the site, avoiding steep terrain and environmentally sensitive areas, and express the agrarian theme through road design and landscaping. The proposed project would be designed to promote alternative modes of transportation. For example, the street rights-of-way would be designed to accommodate pedestrian, bicycle, and NEV travel as appropriate to the context and setting. The proposed project would pay its fair
Objective 1: Ensure that the existing and future transportation system is accessible, safe, reliable, efficient, integrated, convenient, well-connected and multi-modal. The system will accommodate active transportation, and accommodate people of all ages and abilities, including pedestrians, disabled, bicyclists, users of mass transit, motorists, emergency responders, freight providers and adjacent land uses.	
Policy 1.1: The City shall provide integrated transportation and land use decisions that enhance smart growth development served by complete streets, which facilitate multimodal transportation opportunities.	
Policy 1.2: The City should design streets in a manner that is sensitive to the local context and recognizes that needs vary between mixed use, urban, suburban, and rural settings.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Policy 1.3: The City shall ensure that the entire right-of-way is designed to accommodate appropriate modes of transportation.	share of transportation impact fees. Therefore, the proposed project would be consistent with this goal, objectives, and policies.
Policy 1.5: The City should regularly review, update and collect adequate transportation impact fees (TIF) and ensure the efficient allocation of state and regional funding sources for the development and maintenance of local transportation (across all modes) improvements and operations.	
Objective 2: 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.	Roadways on the project site would be designed as a system of Complete Streets that safely accommodate and support all users, including motorists, pedestrians, and bicyclists. The applicant has worked closely with the City to design safe and appropriate street standards for the community. Project mobility focuses on reducing the number and length of vehicle trips and providing alternatives to gasoline-powered vehicle use. This would be achieved by locating services and goods close to residences and optimizing circulation systems to create direct, efficient, safe, and comfortable routes for a variety of transportation modes. The provision of a farm, a school site, parks and recreation facilities, retail, and office uses would specifically address the needs of project residents and create a self-contained community that requires fewer trips outside of the project site. The design of the proposed project would encourage alternative transportation modes that generate fewer emissions such as walking, biking, use of electric vehicles, transit, and ridesharing. Traffic calming and pedestrian safety measures such as roundabouts, curb extensions, narrow street sections, enhanced crossings, landscape buffers, and on-street parking at appropriate locations would be integrated into the proposed project's mobility system. Section 4.16, Transportation, of this EIR analyzes the Level of Service on key street segments and at key intersections within the vicinity of the project site. The proposed project would implement applicable mitigation measures identified in the EIR to reduce project impacts, as feasible including a TDM Plan. The TDM Plan would support alternative modes, manage shared facilities to optimize transportation modes, implement and support appropriate advanced technologies, and reduce air quality pollutant and greenhouse gas emissions. In addition, the proposed project would initiate a Monitoring Program once the average daily trip amount on Fanita Parkway between Ganley Road and Lake Canyon Road reaches 13,000 ADT to ensure that impacts remain within acceptable levels. Finally, the proposed project would install an adaptive traffic signal control system along Mission Gorge Road between Fanita Drive and Town Center Parkway. Adaptive traffic signals, or "smart" signals, communicate with each other and
Policy 2.1: The City shall encourage an automobile Level of Service "D" on street segments and at intersections throughout the circulation network while also maintaining or improving the effectiveness of the non-automotive components of the circulation system (i.e., pedestrians, bicyclists, and public transit), especially in the Town Center area. The City may approve a lower automobile Level of Service if it finds that the effectiveness of non-automotive components of the circulation system would be maintained or improved as a result. In other cases, the City shall not approve any development that causes a drop in the Level Of Service at a street segment or an intersection to LOS "E" or "F", after feasible mitigation, without overriding social, economic, or other benefits.	
Policy 2.2: The City should ensure adequate accessibility for all modes to the northern undeveloped area of the City by designating a functional network of public streets for future dedication either prior to, or concurrent with anticipated need.	
Policy 2.3: The City shall establish minimum design standards for streets, which include grade, widths, alignment and public improvement requirements in a City design manual.	
Policy 2.6: The City should encourage traffic circulation improvements such as, but not limited to, enhanced roadway markings, synchronized traffic signals, and Intelligent Transportation System (ITS) network management.	
Policy 2.9: The City should work with the region to develop traffic and congestion management programs to improve commute times and improve air quality.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
	dynamically adjust signal timings, memorize traffic patterns, improve traffic flow, and reduce vehicle stops. The improved conditions resulting from implementation of an adaptive traffic signal control system are evidenced by a decrease in overall travel time through the subject corridor. Implementation of an adaptive traffic signal control system would result in a decrease in overall travel time, similar to the benefit that physical widening of the road would provide from increased physical capacity. Therefore, the proposed project would be consistent with this objective and these policies.
Objective 3: Upgrade and maintain Santee transportation corridors to meet the safety needs of all roadway users – including youth and elderly and travelers of varying physical abilities – and to provide a well-connected system throughout the City.	Roadways on the project site would be designed as a system of Complete Streets that safely accommodate and support all users, including motorists, pedestrians, and bicyclists. The applicant has worked closely with the City to design safe and appropriate street standards for the community. Street design elements would include roundabouts, split roads, center medians on major roadways, enhanced crossings, left-turn pockets, curb extensions, and parkways that would be landscaped with native and edible plant species to complement the adjacent open space areas and the Farm. Multiple ingress/egress points and appropriately sized streets would be included to allow quick access for emergency vehicles to all portions of the project site. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 3.1: The City shall encourage the development of improved signalization and intersection design while taking into consideration the safety of all modes.	
Policy 3.2: The City should encourage the utilization of traffic control devices, such as center medians and/or left-turn pockets where appropriate and that do not conflict with safety, and discourage the installation of median cuts where traffic safety cannot be assured.	
Policy 3.3: The City shall ensure that newly constructed roadways are designed to permit rapid access for emergency vehicles.	
Policy 3.4: The City shall provide adequate traffic control devices throughout the City to ensure safe and efficient mobility.	
Policy 3.5: The City shall encourage the use of innovative methods for traffic control (such as roundabouts, curb extensions, and traffic circles) where appropriate that add character, slow vehicle speeds, and create opportunity for improved aesthetics while effectively managing traffic.	
Objective 4: Maximize the utilization of site planning techniques to improve traffic safety.	Driveways on the project site would be designed to take direct access from residential streets or village streets instead of from arterials, collectors, or other major roads. Traffic calming measures would be incorporated into the overall mobility system design, including roundabouts, curb extensions, narrow road sections, enhanced crossings, landscape buffers, and on-street parking at appropriate locations. Guidelines on loading, service, and storage areas for commercial and mixed-use development are provided in Chapter 6 of the Fanita Ranch Development Plan. Setback and off-street parking requirements would be included in Chapter 3 of the Fanita Ranch Development Plan. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 4.1: The City shall encourage new subdivision development be designed in a manner where driveways do not take direct access from prime arterials, major roads or collector streets.	
Policy 4.3: The City shall promote design standards that allow for safe and efficient transport, delivery, loading and unloading of goods from service vehicles within commercial and industrial areas.	
Policy 4.4: The City should pursue minimization of the number of entrances and exits to strategic locations along major thoroughfares by requiring the establishment of	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
shared driveways and reciprocal access between adjoining properties.	
Policy 4.5: The City should establish and implement appropriate setback and off-street parking requirements.	
Objective 5.0: Allow parking reductions around transit and affordable housing**.**	The proposed project's parking regulations for the Village Center areas would take a shared, unbundled approach to reduce the demand for parking and provide parking as efficiently as possible. Due to the mixed-use nature of the Village Center land use designation and the desire to promote walkability, the Village Center designation would approach parking as a shared amenity between uses. The intent would be to allow for shared parking between uses with different operation hours or varied peak parking periods as a means of reducing the visual impact of large parking lots on the public street, reducing pavement that may contribute to the heat island effect, and promoting walking or alternative modes to single-occupancy vehicle use. Shared parking would be managed by a Parking Management Plan or the proposed TDM Plan. The number of required vehicle spaces may be reduced or increased pursuant to the approved Parking Management Plan or TDM Plan. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 5.2: The City should maximize shared parking opportunities for uses with varied peak parking periods.	
Policy 5.3: The City should exercise flexibility in the application of parking standards to support transit-oriented development.	
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.	Bicycle circulation throughout the project site would be facilitated through a combination of on-street bike lanes and off-street multi-purpose trails, as illustrated in the Fanita Ranch Development Plan. Class II bike lanes and multi-purpose trails would be provided along Fanita Parkway, Cuyamaca Street, and Magnolia Avenue. The Habitat Preserve would include mountain biking trails, which would use existing trail routes to the extent feasible to avoid sensitive habitat areas. Bike trails would be designed for both recreation and to provide direct off-street access between the villages. To further promote bicycling on the project site, each Village Center would provide a bike station where riders have access to water and air, electric bike charging stations, and a bicycle sharing system. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 7.1: The City shall continue to implement and maintain a comprehensive bicycle route system, and designate appropriate bikeways through the regular update of the City's Bicycle Master Plan.	
Policy 7.2: The City should strive to achieve objectives and policies identified in the Bicycle Master Plan including those related to bicycle safety awareness, bicycle promotion, maintenance and monitoring. Educational awareness programs shall include an environmental component that teaches bicycle users the importance of staying on designated trails to minimize impacts to wildlife resources.	
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.	Pedestrian circulation throughout the project site would be provided through an extensive network of sidewalks/community trails, multi-purpose trails, perimeter trails, and native trails that connect the three villages and destinations within the villages, as shown on Figure 3-10, Pedestrian Circulation Plan. The key
Policy 8.1: The City should require the incorporation of pedestrian-friendly design concepts where feasible	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
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.	to a successful pedestrian circulation system is to provide safety, connectivity, and comfort. The proposed project would accomplish this through narrow street sections, enhanced street crossings, roundabouts, landscape buffers, and on-street parking to reduce traffic speeds. Streets on the project site would include a sidewalk or a multi-use trail and attractive streetscape to promote walking and enhance the pedestrian experience. Additionally, several features would be designed into the mobility plan to calm traffic, promote pedestrian safety, and provide safe routes to the school site, the Farm, parks and recreation facilities, and Village Centers through narrow road sections, enhanced road crossings, roundabouts, landscape buffers, and on-street parking to slow traffic. At intersections where significant pedestrian crossings are anticipated, crosswalks would be enhanced with striping, signage, and landscape features designed to heighten the driver's awareness and indicate the presence of pedestrians. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 8.2: The City should provide for the connectivity of wide, well-lit sidewalks and environments with safety buffers between pedestrians and vehicular traffic, where feasible.	
Policy 8.3: The City should pursue the elimination of physical barriers around public facilities and commercial centers to improve access and mobility of the elderly and disabled in a manner consistent with the Title 24 of the California Code of Regulations and the federal Americans with Disabilities Act (ADA).	
Policy 8.4: The City shall require non-contiguous sidewalks on all streets with a residential collector classification or higher, as appropriate.	
Policy 8.5: The City should identify and implement pedestrian improvements with special emphasis on providing safe access to schools, parks, community and recreation centers, and shopping districts.	
Policy 8.6: The City should promote walking and improve the pedestrian experience by requiring pedestrian facilities along all classified streets designated on the Circulation Plan; by implementing streetscape improvements along pedestrian routes that incorporate such elements as shade trees, street furniture, and lighting; by orienting development toward the street; by employing traffic calming measures; and by enforcing vehicle speeds on both residential and arterial streets.	
Policy 8.7: The City should promote walking as the primary travel mode for the school trip through implementing the citywide Safe Routes to School Plan.	
Policy 8.8: The City should improve pedestrian safety at intersections and mid-block crossings, where appropriate.	
Policy 8.10: The City should provide connected network of safe pedestrian crossings throughout the City.	
Objective 9.0: Increased use of alternative modes of travel to reduce peak hour vehicular trips, save energy, and improve air quality.	The proposed project would support car-sharing/ride-sharing and NEV use through the provision of passenger loading areas, charging stations, and dedicated preferred parking locations in each Village Center, the school site, the Farm, and the Community Park. NEVs may be operated on public streets where the speed limit would be 35 miles per hour or less. This includes all streets within the village boundaries and between
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.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Policy 9.3: The City should encourage employers to offer shared commute programs and/or incentives for employees to use transit.	the villages. Streets on the project site would be designed as a system of Complete Streets that safely accommodate and support all users, including motorists, pedestrians, and bicyclists. Bicycle circulation throughout the project site would be facilitated through a combination of on-street bike lanes and off-street multi-purpose trails, as illustrated on Figure 3-9, Bicycle Circulation Plan. Pedestrian circulation would be provided through an extensive network of sidewalks/community trails, multi-purpose trails, perimeter trails, and native trails that connect the three villages and destinations within the villages, as shown on Figure 3-10. The intent would be to provide safe bicycling and walking access to major destinations in the community such as the school site, the Farm, parks and recreation facilities, and Village Centers. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 9.4: The City should encourage the use of alternative transportation modes, such as walking, cycling and public transit. The City should maintain and implement the policies and recommendations of the Bicycle Master Plan and Safe Routes to School Plan to improve safe bicycle and pedestrian access to major destinations.	
Policy 9.5: The City should improve safety of walking and biking environment around schools to reduce school-related vehicle trips.	
Recreation Element	
Goal: The goal of the Recreation Element is to provide a system of public parks and recreational facilities which serve the citizens of Santee.	Santee Municipal Code, Chapter 12.40, establishes the provisions for dedication of land, payment of in-lieu fee or a combination of both for the purpose of providing park and recreation facilities to serve future residents of a subdivision development (City of Santee 2022b). Santee Municipal Code, Section 12.40.070, requires the parkland dedication ratio of 5 acres per 1,000 population. Per the public park credit provisions set forth in Santee Municipal Code, Section 12.40.110, developed parkland dedicated to and maintained by the City would receive up to 100 percent park credit. Developed parkland maintained by the homeowners association and trail systems would receive up to 50 percent credit per the private park credit provisions in Santee Municipal Code, Section 12.40.100. The proposed project would provide approximately 78 acres of public parklands for active and passive recreation and private parklands and 4.5 acres of trail lands consisting of perimeter trails and the Stowe Trail connections planned on the project site, totaling 82.5 acres. Approximately 52.4 acres of the total 82.5 acres is available for parkland dedication credit, which satisfies the Santee Municipal Code, Chapter 12.40, Park Lands Dedication, requirement of 5 acres of parkland per 1,000 population and results in a surplus of 4.8 acres. In addition, the proposed project includes 47.6 acres of other recreation and open space areas, which are qualified to meet the Santee General Plan Recreation Element Objective. These areas consist of the 11.5-acre passive portion of the public Community Park, the 27.3-acre Farm, and 10.9 acres of other Agriculture Overlay lands. It should be noted that the underlying land use for the School Overlay school site would be Medium Density Residential. If the 15-acre reserved school site would not be acquired for
Objective 1: 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 1.2: The City shall continue to encourage the Santee School District and the Grossmont Union High School District to jointly develop and use school property for recreational purposes.	
Policy 1.5: The City shall promote the compatibility of land uses adjacent to parks.	
Policy 1.8: The City should, when feasible, require developers to contribute land and develop on that land multi-purpose playing fields or recreational facilities**.**	
Policy 1.9: The City should not count private recreational facilities, or open space in planned residential developments, as fulfilling the requirement for park dedications or in-lieu park fees.	
Policy 1.10: The City shall use the Parks and Recreation Facilities Master Plan as a guide in evaluating development proposals on possible future park sites.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

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	school use within 2 years of approval of the final map containing the school site, the Medium Density Residential land use may be implemented on the site, increasing the project site unit count by 59 units for a maximum total of 3,008 units. Should the land use revert to Medium Density Residential, the developed parkland and recreational facility dedication requirement would increase by 0.9 acre. The project site would meet the obligation for the additional required amount of land or fee in lieu thereof pursuant to the provisions of Santee Municipal Code, Chapter 12.40, which could be by applying the surplus mentioned previously to the dedication credit and dedicating a park within the school site, expanding the Community Park or another park in the Development Plan Area, paying a fee in lieu of dedication, or a combination thereof. Therefore, the proposed project would be consistent with this objective and these policies.
Objective 2.0: Provide adequate recreational acreage and facilities in all areas of the City.	The proposed project would include a variety of community recreation amenities such as active and passive parks, extensive open space natural areas, a comprehensive trail and bikeway system, and a community farm, which would all serve recreational purposes. The proposed school site would be adjacent to a Community Park and a Neighborhood Park to allow for joint use facilities such as play fields, playgrounds, or similar recreational amenities for use by the public. Additionally, private recreation amenities such as clubhouses, community pools, or similar improvements would be part of future development applications. The Community Park would be City owned and maintained, while the Neighborhood Parks, except NP-8, and Mini-Parks would be privately maintained but open to the public. Therefore, the proposed project would be consistent with this objective and these policies.
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.	
Policy 2.5: The City should require the inclusion of private recreation areas in all Planned Residential Developments.	
Policy 2.6: The City shall aggressively pursue the development of additional publicly owned parks and recreation facilities which are distributed throughout the City to meet the needs of all residents	
Trails Element	
Overall Goal: The Trails Element shall encourage alternative means of transportation on a community and regional scale by providing a comprehensive network of bicycle, equestrian, and pedestrian trails which serve present and future needs of our community, and which preserve and/or enhance the community character and the environment.	The proposed project would include a comprehensive pedestrian and bicycle trail system that provides connectivity within and between the villages, and with the adjacent regional trails and local trails that connect to surrounding open space areas, residential neighborhoods, parks, and the Santee Town Center to the south. Multi-purpose trails would be within the street rights-of-way along Fanita Parkway and Cuyamaca Street, which would support pedestrian and bicycle travel. The multi-purpose trail along Cuyamaca Street would extend south off site to connect to the Santee Town Center and the San Diego River as part of the north–south regional corridor. The Habitat Preserve on the project site would be offered for dedication to the City's Draft MSCP Subarea Plan. Trail access in the Habitat Preserve would be subject to the requirements and provisions of the Public Access Plan (see Appendix D, Biological Resources Technical Report, of this EIR) and the City's Draft MSCP Subarea Plan. Therefore, the proposed
Goal: Encourage alternative means of transportation on a regional and community scale.	
Objective 1: 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	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

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proposed trail locations shall dedicate easements which will provide safe and direct access to community or regional trails, and provide for trail maintenance.	project would be consistent with this goal, objective, and these policies.
Policy 1.3: Regional and/or community routes within the City should link up with existing or proposed routes within neighboring jurisdictions.	
Policy 1.4: There should be at least one east–west regional corridor extending from San Diego through Town Center to Lakeside and one north–south corridor extending from El Cajon through Town Center north to Fanita Ranch. The corridors should provide for, pedestrian, bicycle, and where feasible, equestrian use.	
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: Provide trails which are designed to impact the environment as little as possible and which blend in with the character of the community.	Pedestrian circulation throughout the project site would be provided through a network of sidewalks/community trails, multi-purpose trails, perimeter trails, and nature trails as shown on Figure 3-10. The proposed project would provide public access to the existing trails that have been historically used by the public without authorization. New trails would generally follow contour lines and be located where minimal grading or habitat disruption would occur. Trails on the project site would be designated and designed with consideration given to pedestrian and bicycle connections within the site and to the surrounding off-site trails and open space, accessibility, minimal conflicts with sensitive habitat areas, and view opportunities. Trails would utilize concrete or natural surfaces that are appropriate for the intended use and blend with the surrounding areas. Trails would be located along the northerly and southerly drainages, which would offer pedestrian connections between the school site, the Farm, and the Active Adult neighborhood with minimal interruptions from vehicular traffic. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 2.1: Trails should be surfaced with materials which blend in with the surrounding area while complying with safety and maintenance requirements.	
Policy 2.2: Trails should be designated along existing drainage channels, utility right-of-way and other areas which must remain undeveloped.	
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.	
Policy 2.4: Trails should be designated and designed with consideration given to appropriate widths, clearances, grade curvatures, surfacing, surface drainage, design speed, barriers, fences, signage, visibility, intersections, bridges, and street cleaning. Wherever feasible, consideration should be given to ensuring accessibility by the handicapped and other special needs groups in accordance with the Americans with Disabilities Act.	
Objective 3: Provide accommodations for the trail user wherever possible.	To promote bicycling on the project site, each village would provide a bike station where riders have access to water and air, electric bike charging stations, and a bicycle sharing system. The bike stations would be located in the Village Centers. Bicycle parking with bicycle racks would be provided at the school site, the Farm, the Village Centers, the
Policy 3.1: Large non-residential developments should be encouraged to provide showers and lockers, flexible work schedules and other means to encourage and facilitate use of alternative modes of transportation by employees.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Policy 3.2: Bicycle racks should be made available at all new or rehabilitated non-residential developments.	Community Park and Neighborhood Parks, and within the multi-family neighborhoods. Signage and well-defined trail markers would be installed to identify the trail locations and minimize potential conflicts with sensitive habitat areas. Pedestrian circulation throughout the project site would be provided through an extensive network of sidewalks/community trails, multi-purpose trails, perimeter trails, and nature trails for walking and hiking, as shown on Figure 3-10. Bicycle circulation throughout the community would be facilitated through a combination of on-street bike lanes and off-street multi-purpose trails, as illustrated on Figure 3-9. These trails and bikeways would provide connectivity on the project site and to the adjacent regional trails and local trails that lead to surrounding open space areas and neighborhoods. Therefore, the proposed project would be consistent with this objective and these policies.
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**.**	
Policy 3.5: The City shall, in developing a trail system, especially in the San Diego River corridor, coordinate between various projects within the City, as well as with a regional trail system in neighboring jurisdictions.	
Objective 5: To provide paved trails which are safe.	Bicycle circulation throughout the community would be facilitated through a combination of on-street bike lanes and off-street multi-purpose trails, as illustrated on Figure 3-9. The Habitat Preserve would also provide nature trails for mountain biking located within existing trail routes to the extent feasible to avoid sensitive habitat areas. Speeds on residential roads within the Village Centers and residential neighborhoods would be slow enough (25 mph or less) to allow the travel lanes to be shared by both vehicles and bicycles. Bicycle trails would be designed for both recreation and to provide direct access between the villages, ensuring user safety and minimizing interference with traffic, pedestrians, and vegetation. Each Village Center would provide a bike station at an appropriate location where riders have access to water and air, electric bike charging stations, and a bicycle sharing system. Signage and well-defined trail markers would be installed at appropriate trail locations. Amenities such as lighting and benches would be encouraged along trails, where appropriate. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 5.1: The determination of the appropriate type of paved trail should primarily be based upon safety requirements. There are three classifications of bike trails: 1. Bicycle paths (Class I) are the safest type of bicycle trail and should, therefore, be utilized as much as possible for regional and community trails, but not for those designated on small local streets where traffic volume is minimal. 2. Bicycle lanes (Class II) are the second safest type of bicycle trail. These should be utilized as necessary links to bicycle paths or local routes where paths are not feasible. 3. Bicycle routes (Class III) are the least safe type of bicycle trail. They should be utilized as a last priority for necessary links or as interim links prior to the implementation of bicycle paths. When used, they should be signed wherever possible.	
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.	
Policy 5.4: Encourage facilities such as lighting, benches, bathrooms, and drinking fountains along trails where it is appropriate.	
Goal: Designate the location and the appropriate type of improved (paved) bicycle trails that would have the	The proposed project would include a comprehensive pedestrian and bicycle trail system that would provide

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
greatest potential to serve the commuter and recreational needs of the community.	connectivity within and between the villages, and would link the community with the adjacent regional trails and local trails that lead to surrounding open space areas and residential neighborhoods. Trail access in the Habitat Preserve would be subject to the requirements and provisions of the Public Access Plan and the City's Draft MSCP Subarea Plan. Trails throughout the project site would be designed in loops or with multiple connection points so the trail user can change direction and have options to reach their desired endpoints. Therefore, the proposed project would be consistent with this objective and these policies.
Objective 6: Provide unimproved trails that are viable routes within the community.	
Policy 6.1: Priority shall be given to designating unimproved trails for multi-purpose use whenever feasible.	
Policy 6.2: Develop a future system of trails on the Fanita Ranch site as well as throughout the City's multiple species conservation program preserve planning area. Priority shall be given to using existing trail alignments whenever feasible.	
Policy 6.3: Trail segments should not be made available for public use until a usable segment is established and where unauthorized entry onto private property can be controlled.	
Policy 6.6: Trails should be designed in loops to prevent having to repeat the same route.	
Policy 6.7: Encourage trail connections with planned trails on the Santee Lakes property and future development of Fanita Ranch.	
Objective 7: Provide trails which are safe.	Streets on the project site would include a sidewalk or multi-purpose trail to accommodate pedestrians. These sidewalks and multi-purpose trails would be separated from the roads by landscaped parkways. Trails along the riparian area would also offer pedestrian connections between the school site, the Farm, and the Active Adult area with minimal interruptions from vehicular traffic. Limited equestrian access would be allowed on a trail in the northeastern portion of the site. Switchbacks are encouraged where the terrain would be too steep to traverse safely. Signage would be posted at staging areas and key locations on unimproved nature trails advising users of trail gradients and risks. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 7.1: The determination of appropriate types of trails should primarily be based on safety requirements.	
Policy 7.2: Pedestrian and equestrian trails should be separated from the street. Only when absolutely necessary should riding trails be designated on streets.	
Policy 7.3: For new trails, switchbacks should be utilized in areas of steep terrain.	
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: Provide community trails that link with regional trail systems and facilities.	The proposed project would establish a comprehensive trail system that would be designed to connect the proposed project to adjacent regional trails and open space areas including Mission Trails Regional Park, Santee Lakes Regional Park, the San Diego River trail system, and Goodan Ranch/Sycamore Canyon County Preserve. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 8.1: Encourage the establishment of trail systems in the East Elliot area and on Fanita Ranch that links Fanita Ranch and Mission Trails Regional Park with Santee Lakes and Goodan Ranch Regional Park/Sycamore Canyon Open Space Preserve, and any future northern expansion of Mission Trails Regional Park.	
Policy 8.2: Encourage trail connections to the Trans-County trail system, the Upper San Diego River Improvement Plan, the Mission Trails Regional Park trail system and trails leading to Goodan Ranch Regional Park/Sycamore Canyon Open Space Preserve.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Policy 8.3: Encourage trail connections which take advantage of trailhead and support facilities planned or existing within neighboring regional parks.	
Objective 9: Provide trails within the future Multiple Species Conservation Program Preserve which are consistent with the City's subarea plan and implementing agreement.	Trail access in the Habitat Preserve would be subject to the requirements and provisions of the Public Access Plan and the City's Draft MSCP Subarea Plan. Trails would be carefully located and designed to minimize potential conflicts with sensitive habitat areas and wildlife movement routes. An existing equestrian trail would be retained in the northeastern portion of the project site (see Figure 3-6, Conceptual Park, Trails, and Open Space Plan). Where the Stowe Trail abuts the project site Habitat Preserve, equestrian users would be directed to alternative existing trails in the County, as authorized. The proposed project would provide signage and well-defined trail markers along the trails. Habitat areas would be protected through signage, fencing, and community education. Therefore, the proposed project would be consistent with this objective and these policies.
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 form riparian or coastal sage scrub resources to minimize the possibility of cowbird parasitism and to ensure biological values are not impaired.	
Policy 9.6: Avoid conflicts with key movement routes utilized by wildlife to the maximum extent possible**.**	
Conservation Element	
Goal: The goal of the Conservation Element is to conserve open space, natural and cultural resources.	Figure 4.3-4, Habitat Preserve Plan, illustrates the portions of the project site that would be designated as Habitat Preserve and would contribute to the City's Draft MSCP Subarea Plan preserve system. The Habitat Preserve would include hillsides with steep slopes to minimize landslide and mudslide hazards and to protect key visual resources. Grading on the project site would be as efficient as possible to minimize the development footprint and maximize the preservation of significant landforms. Except as described in the Fanita Ranch Development Plan, grading on the project site would comply with the requirements of the Santee Municipal Code. Grading design standards would be provided in Section 8.1.1 of the Fanita Ranch Development Plan. Therefore, the proposed project would be consistent with this goal, objective, and policies.
Objective 1: Protect areas of unique topography or environmental significance to the greatest extent possible.	
Policy 1.1: The City shall encourage significant natural landforms to be maintained during development whenever possible.	
Policy 1.2: The City should encourage, through the environmental review process, the preservation of hillsides with steep slopes as appropriate to minimize danger from landslides and mudslides, as well as to protect key visual resources.	
Policy 1.3: To protect and wisely manage hillsides and topographic resources, the City shall use the following hillside development guidelines: 1. Less than 10 percent: this is not a hillside condition. Conventional grading techniques are acceptable 2. 10 percent –19.9 percent: development with grading will occur in this zone, but existing landforms should retain their natural character. Padded building sites	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
are permitted on these slopes, but contour grading, split level architectural prototypes, with stacking and clustering are expected. 3. 20 percent and over: special hillside grading, architectural and site design techniques are expected, and architectural prototypes should conform to the natural land form. Compact development plans should be used to minimize grading footprints.	
Objective 2: Protect floodways to reduce flood hazards, protect biological resources and preserve the aesthetic quality along water corridors.	The proposed project would provide a storm drainage system that would collect stormwater through a series of swales, catch basins, and culverts, which would direct stormwater to detention/ biofiltration basins as illustrated on Figure 3-13, Conceptual Storm Drainage Plan. This system would allow natural infiltration, evapotranspiration, and filtering of the stormwater to remove microscopic organisms, suspended solids, organic material, nitrogen, and phosphorous. Once cleaned, stormwater from the basins would drain into Sycamore Canyon Creek, then to the San Diego River, which ultimately drains into the Pacific Ocean. The proposed project would not be located within any designated floodway and all development would be outside the 100-year floodplain. Therefore, the proposed project would be consistent with this objective and these policies.
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 2.2: 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.	
Policy 2.6: The City encourages the development of appropriate flood control measures to assure public safety, which also prioritize maintenance of natural habitats and vegetation, and provision of community recreational opportunities as feasible and appropriate.	
Policy 2.7: The City shall ensure that all development proposals are located outside of designated floodways and all development in the 100-year floodplain is consistent with the City's flood damage protection ordinance.	
Objective 3: Maintain adequate domestic water supplies for all residents and uses within the City.	The landscape palettes for the proposed project would include native and drought tolerant plant materials, consistent with Santee Municipal Code, Chapter 13.36, Landscape and Irrigation Regulations, and the California Model Water Efficient Landscape Ordinance. The proposed project would use, if implemented, purified water or advanced treated water provided by PDMWD through its East County Advanced Water Purification. The proposed project may use recycled water for construction purposes on a limited and seasonal basis. Advanced treated water offers a more cost-effective and efficient alternative to recycled water and provides a local, reliable, and sustainable water supply to the project site. This would be complemented by water-efficient landscaping, weather-based irrigation controllers, and water-efficient appliances, fixtures, and water closets in the new buildings. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 3.1: The City should encourage the use of drought-resistant vegetation and encourage the use of recycled water for irrigation for both private development as well as public projects and facilities.	
Policy 3.2: The City shall encourage the development and utilization of innovative water conservation measures in all proposed developments.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Objective 4: Reduce the amount of erosion of soil in the City.	The project site's soil and geologic conditions have been evaluated in Section 4.6 of the EIR. The proposed project would implement the applicable mitigation measures or project design features identified in the EIR. Fanita Ranch Development Plan, Section 8.1, would include grading design standards that address the unique topography of the project site and require slopes that are highly visible from public rights-of-way be designed to include contour grading, landscaping, and similar techniques that create no geological or erosion hazards. Therefore, the proposed project would be consistent with this objective and these policies.
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.	
Policy 4.2: The City shall require appropriate grading, erosion control measures and replanting to minimize erosion and prevent slippage of man-made slopes.	
Objective 7: Preserve significant biological resources.	The following objectives have been established for Habitat Management on the project site: • Designate biologically sensitive and diverse areas of the site as Habitat Preserve for inclusion in the City's Draft MSCP Subarea Plan preserve system. • Ensure the long-term viability and sustainability of native ecosystems on the project site through long-term funded open space management. • Implement the Natural Community Conservation Planning Act design guidelines and standards, including conservation and enhancement of sensitive habitats and species, promotion of healthy biodiversity, and allowance of managed passive recreation activities, such as trails. • Provide carefully planned and managed public access to the Habitat Preserve to allow residents and visitors to enjoy the scenic qualities of the site, connect with nature, and learn about and appreciate the site's biodiversity. • Restore and enhance native plant communities in key locations to support long-term propagation of viable populations of sensitive plant and wildlife species. • Close existing, informally established, and potentially harmful trails and provide revegetation in those areas. • Maintain wildlife corridors through the project site and provide wildlife corridor connections to adjoining open space areas in order to maintain large-scale wildlife movement. • Develop a management strategy to enhance and protect sensitive species, habitats, wildlife corridors, and linkages to ensure they remain functional and healthy. Therefore, the proposed project would be consistent with this objective and these policies.
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.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Objective 8: Preserve significant cultural resources.	Cultural resources are present on the project site. A Phase I intensive survey and report was completed to determine the presence or absence of archaeological features where proposed development or activity could have a potential effect. The survey included archival research of California Historical Resource Information System (CHRIS), a Sacred Lands File search, contacting local tribes, reviewing historical aerial photographs and maps, and a pedestrian survey. The proposed project would implement the applicable cultural resources mitigation measures identified in Section 4.4, Cultural and Tribal Cultural Resources, of the EIR to reduce impacts to a less than significant level. Therefore, the proposed project would be consistent with this objective and these 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.	
Objective 9: Reduce pollutants in urban runoff and stormwater discharges.	Stormwater would be collected using low-impact development techniques and BMPs to treat stormwater near the source and ensure that water captured from runoff is clean prior to discharging into the natural watershed. All stormwater would be treated in compliance with the San Diego Regional Water Quality Control Board Tentative Order RB-2013-0001. In addition, the proposed project will be required to meet full trash capture requirements as imposed by the State of California. Therefore, the proposed project would be consistent with this objective and these policies.
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.	
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.	Approximately 63 percent of the project site would be designated as Habitat Preserve and would remain as natural open space. A Preserve Management Plan that meets the requirements of the City's Draft MSCP Subarea Plan has been prepared for the Habitat Preserve (see Appendix D). Therefore, the proposed project would be consistent with this objective and these policies.
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.	
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.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Objective 11: Promote a balanced mix of open space uses with development throughout the City to enhance visual resources, avoid hazards and conserve resources.	Parks and recreational facilities, trails and open space would play a key role in supporting the vision for the proposed project as a healthy, active community by offering opportunities to exercise and interact with family and the community and to conserve natural and visual resources for a healthy environment. The proposed project would provide a coordinated system of active and passive parks and recreational facilities that meet the recreational needs of the community and regionally connect City residents by providing opportunities to enjoy the scenic qualities of the site. The proposed project would meet the parkland dedication requirements in accordance with the Santee General Plan. Development would be clustered into three villages to preserve natural open space areas and wildlife corridors. In addition to public parks and natural open space, private parks and recreational facilities and open space areas would be provided in the residential development area on the project site for additional recreational opportunities. Therefore, the proposed project would be consistent with this objective and these policies.
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.	
Policy 11.4: The City should ensure that adequate passive and active open spaces are incorporated into the development of the Town Center, Fanita Ranch, Rattlesnake Mountain, and other large, existing vacant areas.	
Policy 11.5: The City shall encourage compact development plans when appropriate to maximize the preservation of open spaces.	
Noise Element	
Goal: Improve the City's overall quality of life by reducing harmful and annoying noise for existing and future residents.	The proposed project would comply with the City's Noise Ordinance and other applicable noise regulations to eliminate or minimize the impact of noise-producing uses on the project site. A Noise Technical Report was prepared for the proposed project (Appendix L) and potential noise impacts have been evaluated in Section 4.12, Noise, of the EIR prepared for the proposed project. Noise impacts would be mitigated to below a level of significance with the exception of a permanent increase in vehicle noise during project operation. Permanent increases in roadway noise levels would be reduced, but reduction to a less than significant level cannot be demonstrated with reasonable certainty with implementation of mitigation measures. Therefore, permanent roadway noise impacts would remain significant and unavoidable. However, because the proposed project would implement all feasible noise mitigation measures to reduce noise impacts, it would be consistent with this objective and these policies.
Objective 1: Control noise from sources adjacent to residential, institutional and other noise-sensitive receptors.	
Policy 1.1: The City shall support a coordinated program to protect and improve the acoustical environment of the City including development review for new public and private development and code compliance for existing development.	
Policy 1.2: The City shall utilize noise studies and noise contour maps when evaluating development proposals during the discretionary review process.	
Policy 1.3: The City shall enforce motor vehicle laws and standards as appropriate, related to traffic flow and speed, in an effort to reduce noise along roadways experiencing high noise levels.	
Policy 1.4: The City shall promote alternative sound attenuation measures rather than traditional wall barrier wherever feasible; these may include glass or polycarbonate walls, berms, landscaping, and the siting of noise-sensitive uses on a parcel away from the roadway or other noise source.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Policy 1.5: The City shall review future projects with particular scrutiny regarding the reduction of unnecessary noise near noise-sensitive areas such as hospitals, schools, parks, etc.	
Policy 1.6: The City shall continue to monitor noise throughout Santee and enforce the standards and regulations of the City's Noise Ordinance.	
Policy 1.16: The City shall ensure that appropriate regulations and standards are incorporated into the City's development policies and ordinances, including the use of noise evaluations in environmental impact reports and statements, which takes all aspects of noise into consideration.	
Objective 2: Ensure that future developments will be constructed to minimize interior and exterior noise levels.	The proposed project would comply with the City's Noise Ordinance and other applicable noise regulations to eliminate or minimize the impact of noise-producing uses on the project site. A Noise Technical Report was prepared for the proposed project (Appendix L) and potential noise impacts have been evaluated as part of the EIR prepared for the proposed project in Section 4.12. The proposed project would implement all feasible noise mitigation measures to reduce noise impacts. Therefore, the proposed project would be consistent with this objective and these policies.
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 developments to mitigate noise impacts to existing uses resulting from new developments when: 1) such development adds traffic to existing City streets that necessitates the widening of the street; and 2) the additional traffic generated by the new development causes the noise standard or significance thresholds to be exceeded.	
Policy 2.3: The City should not require new development to mitigate noise impacts to existing uses when the new development only adds traffic already anticipated by the City's General Plan to an existing street, but does not necessitate widening of that street.	
Safety Element	
Goal: The goal of the Safety Element is to minimize injuries, loss of life, and property damages resulting from natural and human-induces safety hazards.	A Drainage Study was prepared for the proposed project (Appendix J1) and potential hydrologic impacts have been evaluated as part of the EIR prepared for the proposed project in Section 4.9, Hydrology and Water Quality. The proposed project would focus on low-impact development, implement BMPs, and comply with the Stormwater Pollution Prevention Plan to reduce impacts and effects on downstream and upstream properties and on flood-carrying characteristics of the stream. All critical emergency uses on the project site would be located outside of flood hazard areas. Therefore, the proposed
Objective 1: Minimize injuries, loss of life and property damage resulting from flood hazards.	
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.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
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.	project would be consistent with this goal, the objective, and the policies.
Objective 2: Minimize the loss of life and destruction of property in Santee cause by seismic and geologic hazards.	All structures on the project site would be designed in accordance with seismic parameters of the California Building Code. Multiple geotechnical investigations were prepared for the proposed project (Appendices G1 through G4) and potential seismic, geologic and soil impacts have been evaluated as part of the EIR prepared for the proposed project in Section 4.6. The Special Use land use designation applies to a portion of the project site that was previously graded for a City park; however, geotechnical conditions, including landslide susceptibility, make the site unsuitable for park development and limits allowable uses in this land use designation. The Special Use area falls within the Gillespie Field Airport Influence Area (AIA) (Review Area 2) which limits heights to 35 feet. Based on these restrictions, permitted uses for the Special Use area include water quality basins, a solar farm, recreational vehicle and boat storage, and aboveground agriculture. Retail sales and residential uses, except for one caretaker unit, would not be permitted in the Special Use area. The proposed project would implement the applicable mitigation measures identified in the EIR. Therefore, the proposed project would be consistent with this objective and these policies.
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.	
Objective 3: Minimize the risk of damage to persons, property and the environment cause by hazardous materials.	All hazardous materials used during construction would be handled properly and waste would be properly disposed. Waste and recycling, including construction waste and recycling, would comply with CALGreen requirements to divert waste from landfills. A Phase I Environmental Site Assessment was prepared for the proposed project (Appendix I) and potential hazardous material issues have been evaluated as part of the EIR prepared for the proposed project in Section 4.8, Hazard and Hazardous Materials. The proposed project would comply with applicable regulations and implement the Mitigation Measure HAZ-1, to properly document the abandonment of an existing groundwater well, identified in the EIR. Therefore, the proposed project would be consistent with this objective and these policies.
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.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Objective 4: Minimize injuries, loss of life and property damage resulting from fire hazards.	An FPP has been prepared for the proposed project, which establishes fire protection through a system of fire safety features and design measures that have proven to perform effectively in wildland urban interface and high fire hazard severity zones (see Appendix P1). The FPP would be utilized to meet all required state and City fire prevention requirements. Fuel modification for the proposed project is proposed for the entire exterior perimeter, along roadways and interior landscaped areas adjacent to natural open space, and adjacent to existing homes south of the site. The Fuel Modification Zones include a minimum 15-foot-wide setback zone in the rear or side yards of all perimeter lots and a 15-foot-wide irrigated zone starting at the outer edge of the setback zone and moving outward, along with homeowners association managed and maintained Fuel Modification Zones that vary between 115 and 165 feet wide based on the potential wildfire hazard from adjacent fuels. Roadway setbacks would be 50 feet wide, ensuring the safety of evacuation routes. The proposed project includes multiple ingress/egress points and wide roads that allow evacuation traffic circulation from and emergency vehicle access to all portions of the developed areas. The proposed project would comply with water pressure and fire flow code requirements with hydrants installed throughout the community, and all structures fitted with interior sprinklers. Structures on the project site would be fire hardened, built to the ignition resistant standards of the latest fire and building codes. These standards include a focus on the building exteriors to increase resistance to ignition from flames and heat and ember resistant vents to prevent burning ember from penetrating into buildings, the leading cause of structure losses from wildfires. Due to increased demand and larger service areas, Chapter 3 of the Fanita Ranch Development Plan requires designation of a 1.5-acre site for a new City fire station, Fire Station No. 20, which would be located in the Fanita Commons Village Center. The proposed project would meet the established response time standards for fire and life safety services. The proposed project and the Santee Fire Department would work together to implement the appropriate FPP and design related features. In addition, evacuation routes, modeling, and planning are incorporated in Appendix P2. Evacuation time modeling was performed for several evacuation scenarios during a wildfire. With project implementation, evacuation times would remain adequate to ensure public safety in a wildfire or other evacuation scenario. The proposed project would not significantly increase the risk of loss of life or property from a wildfire. Therefore, the proposed project would be consistent with this objective and these policies.
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 4.9: 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**.**	
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.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Objective 5: Minimize injuries, loss of life and property damages and losses resulting from criminal activities.	The Conceptual Lighting Plan for the proposed project would provide general lighting design guidance for roads, pathways, common open space, recreation areas, buildings, special accent lighting, and sign illumination, Outdoor lighting would be considered during Development Review and would be consistent with the Community Lighting Plan. Light fixture specifications, fixture placement and a photometric analysis are submitted as part of a Development Review application or in conjunction with road or other improvement plans proposed within or adjacent to Habitat Preserve areas. Additionally, the proposed project would work closely with the City to evaluate Crime Prevention Through Environmental Design principles and design for elements to be utilized within the community. All structures on the project site would be adequately identified by street address. Sufficient lighting would be provided on structures to deter criminal activity.
Policy 5.5: All structures should be adequately identified by street address and be lighted sufficiently to deter criminal activity.	
Objective 6: Minimize injuries, loss of life, and property damage resulting from traffic hazards.	Roadways on the project site would be designed as a system of Complete Streets that safely accommodate and support all users, including motorists, pedestrians, and bicyclists. Traffic calming measures such as roundabouts, curb extensions, narrow street sections, enhanced crossings, landscape buffers, and on-street parking at appropriate locations would be incorporated to slow down vehicle travel speed and reduce traffic hazards. Shared driveways between adjacent properties within the Village Centers or commercial areas may be utilized, where appropriate. Car-sharing and NEV use are supported on the project site through the provision of passenger loading areas, charging stations, and dedicated preferred parking locations in each Village Center, the school site, the Farm, and the Community Park. Therefore, the proposed project would be consistent with this objective and this policy.
Policy 6.3: Encourage ridesharing, the use of transit and other transportation systems management programs to reduce the number of vehicle miles traveled and traffic congestion.	
Objective 7: Minimize injuries, loss of life, and property damage resulting from airport hazards.	Only a small southerly portion of the project site falls within Review Area 2 of the Gillespie Field AIA. Since the portion of the site within Review Area 2 would be dedicated as Habitat Preserve and would not be developed and the remainder of the project site would be located outside of any AIA, the project site would not be subject to any land use restrictions. Potential aircraft safety and noise hazards have been evaluated by the EIR prepared for the proposed project. Therefore, the proposed project would be consistent with this objective and this policy.
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.	
Community Enhancement Element	
Objective 2.0: Strengthen neighborhood identity.	Gateways announce entry into the proposed project. Access to project site would be achieved from two main entry points. The design theme for proposed project would be represented in many forms, including farm-themed villages and ecological
Policy 2.1: The City shall promote introduction of distinctive landscape treatments, signage, entry statements, etc., in residential areas.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Policy 2.2: The City shall encourage the use of existing natural features (river, hillsides, etc.) as character/ theme sources for new residential development.	resources outside of the villages. The community has been organized to provide a transition from open space areas to neighborhoods within an agricultural setting. The Farm located in Fanita Commons would be the focal point of the community, and each village would be designed to reflect the importance of the Farm through a unique agricultural theme. Therefore, the proposed project would be consistent with this objective and these policies.
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.	
Policy 2.5: The City shall encourage the formation of a focal point/activity center for neighborhoods when feasible and practical.	
Objective 3: Improve the diversity and quality of housing in the City.	The proposed project promotes an appropriate mix of building typologies, varied setbacks, building placement, and orientation throughout the community to ensure diverse and interesting street scenes and avoid repetitious dwelling designs. The proposed project encourages variety with innovative building typologies, provided they are consistent with the intent of the proposed project. Within the Village Centers, mixed-use residential buildings may be designed to incorporate zero front setback and would be located close to retail, services, jobs, and transit, which would offer a desirable urban lifestyle. Therefore, the proposed project would be consistent with this objective and these policies.
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 siting treatments in hillsides and along the river corridor that respect and enhance the features of the natural environment.	
Policy 3.6: The City shall support housing in mixed use projects that offer a desirable urban lifestyle.	
Objective 4: Promote the integration of new residential development with the existing community.	Walking would be encouraged by providing direct connections to multiple destination that shorten the route and allow walking to be an efficient and viable method of travel. This would be achieved by providing a variety of routes and multiple intersections that offer pedestrians a wide range of options and connections to existing routes. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 4.2: The City shall ensure that new residential development are adequately linked to the existing community by streets, sidewalks, trails and bikeways**.**	
Objective 6: Improve the appearance and condition of commercial facilities in the City.	Commercial and mixed-use buildings in the proposed project would be designed to human scale, as described in Chapter 6 of the Fanita Ranch Development Plan. In general, commercial and mixed-use buildings should front onto a street or spine, which may be designed either as a vehicle free zone or in such
Policy 6.1: The City shall ensure that all new commercial developments contribute towards an overall positive and cohesive visual identity.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
Policy 6.6: The City shall ensure all commercial development is designed to a pedestrian scale.	a manner as to allow for use by both pedestrians and vehicles. Where vehicles are allowed, careful design features should be incorporated to define pedestrian movement through changes in paving materials or grade, articulated walks with landscaping or overhead structures. Primary entrances into commercial and mixed-use buildings should be clearly marked and provide a sense of welcoming and convenient access into the building interior. Therefore, the proposed project would be consistent with this objective and these policies.
Objective 7: Consolidate strip commercial uses into functional commercial units.	Due to the mixed-use nature of the Village Center land use designation and the desire to promote walkability, the Village Center designation would include parking as a shared amenity between uses. The intent would be to allow for shared parking between uses as a means of reducing the visual impact of large parking lots on the public street, reducing pavement that may contribute to the heat island effect and promoting walking or alternative modes to single-occupancy vehicle use. Shared parking would be managed by an approved Parking Management Plan or TDM Plan. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 7.1: The City shall promote replacement of individual store parking lots and driveways with shared parking areas and driveways whenever possible.	
Policy 7.2: The City shall promote coordinated structure setbacks, re-orientation of business entrances, coordinate thematic landscaping, minimizing curb cuts, establishment of reciprocal access points between adjacent properties and consolidation of entrance/exit locations during rehabilitation or redevelopment of commercial areas.	
Objective 9: Provide a unifying and distinctive streetscape system throughout the City.	Roadways within the proposed project would be designed as a hierarchy of Complete Streets that safely accommodate and support all users, including motorists, pedestrians, bicyclists, and transit riders. Sidewalks throughout the project site would be buffered by landscaped parkways or on-street parking. At intersections where significant pedestrian crossing would be anticipated, crosswalks are enhanced with striping, signage, and landscape features designed to heighten drivers' awareness and indicate the presence of pedestrians. Streetscape on the project site would be designed to maintain open views and improve visibility where appropriate, and would be scaled in relationship to the function of the roads. Gateways and landmarks within open space areas would take advantage of existing landforms, natural features, and scenic vistas to provide natural orientation and wayfinding. The Farm located in Fanita Commons would be the focal point of the community, and each village would be designed to reflect the importance of the Farm through a unique agricultural theme. The Village Centers would be designed to incorporate amenities such as water fountains, road furniture, and public art to enhance the pedestrian environment. The plant palette developed for the proposed project would offer a unique and diversified range of plant materials. The plant palette would include water-wise ornamental plants, agricultural plants, edible ornamental, and native plants and interesting accent plants, while respecting the existing native landscape and addressing fire management requirements. The plant palette would be drought tolerant, non-
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.	
Policy 9.3: The City shall ensure adequate landscaped buffers are provided between traffic ways and sidewalks.	
Policy 9.4: The City shall provide for streetscape treatments at activity nodes and major decision-making points, through paving materials and lighting, accent plantings and thematic signage to reinforce their importance.	
Policy 9.5: The City shall continue to utilize landscape maintenance districts where practical to ensure the maintenance of streetscape plant materials and hardscape features.	
Policy 9.6: The City should consider introduction of sculptural elements to the streetscape at major activity nodes (such as water fountains, public art, etc.).	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
	invasive, and complement the natural surroundings. Private parks, common open space areas, and private roads would be maintained by a homeowners association, Property Owners Associations, or a Landscape Maintenance District as mutually agreed between the Landowner/Master Developer and City. Therefore, the proposed project would be consistent with this objective and these policies.
Objective 13: Integrate adequate open space uses into new development within the City.	Development in the proposed project would be clustered into three villages to preserve open space areas and wildlife corridors. Natural open space areas, perimeter slopes that would be revegetated with native species, and utility areas such as water reservoirs, basins, and pump stations would be designated as Habitat Preserve. Some or all of the Habitat Preserve would be offered for dedication as part of the City's Draft MSCP Subarea Plan. Within the villages, additional open space areas would be designated as Open Space, which include interior slopes, basins, natural drainage areas, and other undeveloped lands. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 13.1: The City shall ensure the provision of open space which provides adequate visual relief from developed portions of the City.	
Policy 13.3: The City shall ensure that open space is provided in hillside areas proposed for development that performs multiple functions of view maintenance, resource protection and hazard avoidance.	
Objective 14: Minimize alteration of existing topography especially in hillside areas during the development and redevelopment process.	The site would be graded into development pads using a maximum 2:1 slope ratio for fill slopes and a maximum 1.5:1 for cut slopes. Significant cut and fill slopes, when visible from the public right-of-way, would utilize landform grading techniques whereby the proposed contours mimic the flow of the natural contours to complement the natural surroundings. Cut slopes would be revegetated using the appropriate plant palette. Development would be sited below prominent ridgelines. Therefore, the proposed project would be consistent with this objective and these policies.
Policy 14.1: The City shall encourage and work with developers to minimize the impacts of grading for new development throughout the City.	
Policy 14.2: The City shall ensure that development is oriented along natural terrain contours to extent possible to maintain landform integrity.	
Policy 14.3: The City shall require use of contour grading techniques and multi-layered landscaping, whenever possible, to ensure the natural appearance of manufactured slopes.	
Policy 14.4: The City shall require the use of hillside development techniques in areas of steeper slopes.	
Policy 14.5: The City shall encourage the protection of prominent ridgelines whenever feasible. This shall be accomplished by siting development below ridgelines in such a manner that permits the ridgeline to remain visible.	
Objective 15: Maintain and enhance existing scenic views.	Slopes that are highly visible from public rights-of-way, referred to as "public interest" slopes in the Fanita Ranch Development Plan, in the development area of the proposed project would be designed to include slope rounding and contour grading,
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.	

Table 4.10-1. Project Consistency with Relevant City of Santee Goals, Objectives, and Policies

Santee General Plan Goal, Objective, or Policy	Project Consistency Evaluation
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.	landscaping, and similar techniques that result in a natural appearance and create no geological or erosion hazards. Development would be sited below prominent ridgelines to ensure that new structures do not significantly impact existing community-level viewsheds. Therefore, the proposed project would be consistent with this objective and these policies.
Objective 17: Balance development with natural resource protection needs.	The proposed project would designate approximately 63 percent of the site as Habitat Preserve. The Habitat Preserve areas were selected based on the high quality of habitat, the opportunity to provide or preserve wildlife corridors, and hillsides with significant slopes. Gateways and landmarks within open space areas would take advantage of existing landforms, natural features, and scenic vistas to provide natural orientation and wayfinding. Special grading design standards would address the unique topography of the project site, minimize the development footprint, and maximize the preservation of natural open space areas on the project site. Grading within Fanita Ranch would comply with the requirements of the Santee Municipal Code. Therefore, the proposed project would be consistent with this objective and these policies.
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.	
Policy 17.2: The City should promote the incorporation of unique and significant natural resource features (vegetation, habitat, rock outcrops) into development plans.	

As identified in Table 4.10-1, the proposed project would be consistent with all the applicable goals, objectives, and policies of the Santee General Plan.

For all these reasons, the proposed project would not cause a significant environmental impact due to a conflict with the Santee General Plan or any policies or regulations therein that were adopted for the purpose of avoiding or mitigating an environmental effect.

City of Santee Zoning Ordinance

The City of Santee Zoning Ordinance identifies land uses. The project site is zoned Planned Development (PD). This designation provides for mixed-use development potential including employment parks, commercial, recreational and various densities of residential development pursuant to a development plan and entitlements being approved by the City Council. This designation is intended for select properties in the City where a variety of development opportunities may be viable and where the City 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 proposed project promotes the Planned Development (PD) designation because it provides a unique development that includes creative housing types and use configurations not currently

addressed in the City's existing Zoning Ordinance. The proposed project would include detailed development standards and design guidelines intended to facilitate the creation of new and innovative housing types and configurations, walkability, and housing attainability by creating greater efficiency and addressing the diverse range of incomes, lifestyles, special needs, and household types in Santee and the greater San Diego County region. Therefore, the proposed project would be consistent with the City's Zoning Ordinance upon project approval.

Mitigation Measures

Because the proposed project would not result in a significant impact associated with adopted land use plans, policies, and regulations, no mitigation measures are required.

4.10.6 Cumulative Impacts and Mitigation Measures

Would implementation of the proposed project have a cumulatively considerable contribution to a cumulative land use and planning impact considering past, present, and probable future projects?

Cumulative Impact	Significance	Proposed Project Contribution
Threshold 1: Physically Divide an Established Community	Less than significant	Not cumulatively considerable.
Threshold 2: Conflict with Land Use Plans	Less than significant	Not cumulatively considerable.

4.10.6.1 Cumulative Threshold 1: Physical Division of an Established Community

The geographic context for the analysis of cumulative land use impacts in the City. Cumulative projects identified in Table 4-2, Cumulative Projects, in Chapter 4, Environmental Impacts Analysis, would include the construction of new or widened roadways, airports, railroad tracks, open space areas, or other features that would individually have the potential to physically divide an established community. In addition to these larger projects, smaller cumulative projects could have the effect of forming a barrier to access that would physically divide a community. Such impacts would generally be limited to an individual community and would not be cumulative in nature. Multiple projects in the same community could combine to result in a cumulative effect to the division of that community. However, all cumulative projects would be required to comply with the Santee General Plan and undergo development review prior to approval. This would ensure that a significant cumulative impact related to the physical division of an established community would not occur. Further, the proposed project does not propose any new land uses or infrastructure projects, including roadways that would divide established communities. Therefore, the proposed project's contribution would not be cumulatively considerable.

4.10.6.2 Cumulative Threshold 2: Conflict with Land Use Plans, Policies, or Regulations

The geographic context for the analysis of cumulative land use impacts in the City. This section evaluates the potential for the proposed project to result in a significant contribution to cumulative land use impacts resulting from future development that is inconsistent with applicable land use plans or policies adopted for the purpose of protecting the environment. The proposed project would be consistent with the Santee General Plan and other relevant plans and policies. Furthermore, the cumulative projects identified in Table 4-2 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. In any case, 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 or in other jurisdictions. Therefore, the proposed project, along with the identified cumulative projects, would not result in a cumulative land use impact. The proposed project's contribution would not be cumulatively considerable.

4.10.7 References

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Appendix S. Ruling, Judgment and Writ

MINUTE ORDER AND RULING

SUPERIOR COURT OF CALIFORNIA,
COUNTY OF SAN DIEGO
CENTRAL

MINUTE ORDER

DATE: 08/09/2024 TIME: N/A DEPT: C-69

JUDICIAL OFFICER: KATHERINE A. BACAL
CLERK: S. Christensen
REPORTER/ERM: Not Reported
BAILIFF/COURT ATTENDANT:

CASE NO: **37-2022-00041478-CU-MC-CTL** CASE INIT.DATE: 10/14/2022
CASE TITLE: **Preserve Wild Santee vs City of Santee [IMAGED]**
CASE CATEGORY: Civil CASE TYPE: (U)Other Complaint (Not Specified): Other Complaint

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The Court having taken this matter under submission on 06/14/2024, now rules as follows:

RULING ON SUBMITTED MATTER

Petitioners' first amended petition for writ of mandate and complaint is **GRANTED**.

Preliminary Matters

The unopposed request for judicial notice under Evidence Code section 452(c) and (h) [ROA # 133] by petitioners Preserve Wild Santee, Center for Biological Diversity, California Chaparral Institute and Endangered Habitats League (collectively, "petitioners") of exhibits A through E in support of their opening brief is granted.

The request for judicial notice [ROA # 138] by respondents City of Santee and Santee City Council (collectively "City") and real party in interest HomeFed Fanita Rancho, LLC ("HomeFed") of exhibits 1—4 is denied as irrelevant. Their request for judicial notice of exhibits 5-9 is granted.

Petitioners' supplemental request for judicial notice [ROA # 155] of exhibit 1 is granted.

Background

The first amended petition ("FAP") alleges the following causes of action (1) violation of California Environmental Quality Act ("CEQA") – inadequate environmental impact report, findings, statement of overriding considerations; (2) violation of state planning and zoning law – inconsistency with general plan; (3) violation of subdivision map act – inconsistency with general plan; and (5) violation of elections code – approval of project despite qualifying referendum. ROA # 18. The fourth cause of action, for violation of state very high fire hazard regulations, was dismissed after City and HomeFed's demurrer was sustained without leave to amend. ROA # 58.) Petitioners filed the petition under CCP section 1085 and/or 1094.5, and Public Resources Code section 21168 *et seq*. FAP ¶ 7. Respondent and real party filed answers to the FAP. ROA # 59, 69.

In a bifurcated hearing, the Court heard oral argument as to the first cause of action for violation of CEQA. It then held oral argument on the second, third and fifth causes of action and took the matter under submission. The Court now issues this ruling as to all causes of action.

Standards of Review

In reviewing an agency's compliance with CEQA the Court's inquiry extends "only to whether there was a prejudicial abuse of discretion." *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 512. "[A]n agency may abuse its discretion under CEQA either by failing to proceed in the manner CEQA provides or by reaching factual conclusions unsupported by substantial evidence." *Id.*, citing Pub. Res. Code § 21168.5. Whether the agency employed correct procedures is reviewed *de novo*, whereas the agency's substantive factual conclusions are accorded "greater deference." *Id.* "The ultimate inquiry, as case law and the CEQA guidelines make clear, is whether the EIR includes enough detail 'to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.'" *Id.* at 516 (citations omitted).

The second and third causes of action are brought under a petition for writ of administrative mandamus under CCP section 1094.5. Under that section,

> (b) The inquiry in such a case shall extend to the questions whether the respondent has proceeded without, or in excess of, jurisdiction; whether there was a fair trial; and whether there was any prejudicial abuse of discretion. Abuse of discretion is established if the respondent has not proceeded in the manner required by law, the order or decision is not supported by the findings, or the findings are not supported by the evidence.
>
> (c) Where it is claimed that the findings are not supported by the evidence, in cases in which the court is authorized by law to exercise its independent judgment on the evidence, abuse of discretion is established if the court determines that the findings are not supported by the weight of the evidence. In all other cases, abuse of discretion is established if the court determines that the findings are not supported by substantial evidence in the light of the whole record.

CCP § 1094.5(b) & (c).

The fifth cause of action, for violation of the Elections Code, is brought pursuant to CCP section 1085. "Mandamus will lie to compel a public official to perform an official act required by law. (Code Civ. Proc., § 1085.) Mandamus will not lie to control an exercise of discretion, i.e., to compel an official to exercise discretion in a particular manner. Mandamus may issue, however, to compel an official both to exercise his [or her] discretion (if he [or she] is required by law to do so) and to exercise it under a proper interpretation of the applicable law." California *Teachers Assn. v. Ingwerson* (1996) 46 Cal.App.4th 860, 865, internal citations omitted. "Mandamus will also lie to correct an abuse of discretion by an official acting in an administrative capacity." Petitioner has the burden. Evid. Code § 664.

The petitioners seek a writ of mandate directing respondents to vacate and set aside the REIR certification and associated project approvals; directing the City to comply with the State Planning and Zoning Law, the Subdivision Map Act, the Elections Code, and all applicable state regulations; and petitioners seek a declaration that the City's certification and approval of the Fanita Ranch Project

("project") violated the CEQA and CEQA Guidelines, the State Planning and Zoning Law, the Subdivision Map Act, the Elections Code, and that the certification and approval are invalid. FAP, Prayer ¶¶ 1-4.

Discussion

CEQA (1st COA)

The FAP alleges the EIR is legally defective and respondents prejudicially abused their discretion in violation of CEQA when they approved the project. FAP ¶ 97. The FAP alleges (a) respondents failed to amend and recirculate the EIR for public review and comment; (b) the final EIR's responses did not adequately respond to petitioners' comments; (c) the EIR is inconsistent with the applicable general plan; and (d) the EIR fails to disclose, analyze and/or mitigate biological resource impacts, impacts regarding wildfire and wildfire safety, and transportation and traffic. FAP ¶¶ 87-99. Respondents deny the allegations. ROA # 59, 69.

a. ***CEQA Notice Recirculation Requirements***

Petitioners argue the City did not notify the Center that the draft recirculated EIR was available. OB at 33; see also FAP ¶ 96 (alleging failure to recirculate the EIR as required, which deprived the public and public agencies of meaningful opportunity to review and comment). Respondents apparently do not directly address this argument in their opposition. See Opp. at 39-40 (stating petitioners raised only two issues in the opening brief under CEQA: the comment and disclosure issues). Respondents mention, however, that the record shows the recirculated EIR was provided for public and agency review and comment from July 10, 2022 – July 25, 2022. Opp. at 19, AR 1764, 3212-3217, 14598-14600.

CEQA requires that a lead agency provide public notice of an EIR preparation to the "last known name and address of all organizations and individuals who have previously requested notice, and shall also be given by posting the notice on the internet website of the lead agency," and by at least one of the following procedures: in a newspaper; by posting in the area where the project is to be located; and direct mailing to owners/occupants of contiguous property. Pub. Res. Code § 21092(b)(3) and 14 Cal. Code Regs. ("CEQA Guidelines") § 15087(a).

Here, the record indicates notice was accomplished. The Center does not point to evidence in the record that it previously requested notice. Even if the City did not specifically notify the Center of the availability of the draft recirculated EIR, the evidence indicates the Center transmitted a comment letter and attachments to the City during the review and comment period on July 25, 2022. ROA # 128 at 1, citing Peter Broderick Decl. ¶¶ 3-5, Ex. A; Haskins Decl. ¶¶ 4-8, Ex. A. Accordingly, the Court does not find a notice violation under the CEQA on this basis.

b. ***CEQA Comment Requirements***

Petitioners also argue the City failed to respond to the Center's comments on the draft recirculated EIR, including comments concerning the new wildfire analysis and safety impacts, and comments from a transportation expert concerning the evacuation analysis. OB at 13-14, 34-35, citing AR 20492.12-.13, and AR20492.448.

The City argues that although it omitted the Center's letter from the final recirculated EIR, its final recirculated EIR adequately responded to and addressed the issues raised in the Center's comment

letter because those issues were also raised by others, and so petitioners cannot establish prejudice. Opp. at 40-45. Respondents rely on the California Supreme Court's opinion in *Environmental Protection Information Center ("EPIC") v. California Dept. of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 484.

This Court likewise finds the guidance and analysis in *EPIC* applicable here. The *EPIC* Court posited that the question is whether the agency's error in failing to consider certain comments is prejudicial. *Id.* at 484-485. To assess that question, the Court first considers "what constitutes prejudicial error in cases involving environmental review. As previously noted, 'Only if the manner in which an agency failed to follow the law is shown to be prejudicial, or is presumptively prejudicial, as when the department or the board fails to comply with mandatory procedures, must the decision be set aside....'" *Id.* at 485, citation omitted. "If it is established that a state agency's failure to consider some public comments has frustrated the purpose of the public comment requirements of the environmental review process, then the error is prejudicial." *Id.* at 487. "When an agency adequately addresses an environmental issue in response to one commenter, it may refer to the prior response when addressing other commenters, and a failure to respond to a particular comment is not prejudicial error when the issue raised by the comment is adequately addressed elsewhere." *Id.* at 487, footnote 9.

In advance of the hearing, the Court posed a question in the tentative regarding whether respondents adequately responded to the issue raised in Neal Liddicoat's comment that the wildfire evacuation plan in the draft recirculated EIR did not establish a "performance standard" to determine whether the project evacuation times are significant. ROA # 167, citing AR 20492.448-449. Having considered the arguments in the briefing and presented orally at the hearing, and the evidence in the record, the Court agrees with respondents that the City adequately addressed the issue raised by Liddicoat in their comments.

As shown by Liddicoat's letter, the issue is that if the City "has no established standard within CEQA, how was it determined that the Project's impact was less than significant?" AR 20492.448. Liddicoat commented, "[a]bsent an adopted standard of significance regarding acceptable evacuation times, no determination is possible as to the magnitude of the Project-related impact." AR 20492.449.

Here, the record shows this issue was addressed in the comments under Thematic Response 4(b). There, the City explained that CEQA has not "adopted numerical time standards to determine whether a timeframe is appropriate." AR 1793. Instead, it is "[p]ublic safety" that is "generally the guiding consideration for evaluating impacts related to emergency evacuation." *Id.* The City further explained that it "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." *Id.* As explained by respondents at the hearing, the record shows the Appendix G standard is the standard the City used. *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63, 133, 139-140 (where EIR relied on Guidelines' Appendix G to provide standard of significance, appellate court concluded agency did not abuse its discretion in determining the "methodology for evaluating the impact to its evacuation plan or selecting the standard of

significance"). Thus, this issue was adequately addressed and petitioners have not established prejudice on this basis.

The record also shows the agency adequately addressed the additional environmental issues raised by the Center. Opp. at 43-44, AR 6685-6686, 1790, 3887-3888, see also, AR 2206-2207 (addressing comment regarding roadway capacities assumed in the calculation of evacuation times); AR 1903-1905 (addressing comment regarding detection and notification time in evacuation scenarios); AR 1887-1889 (addressing comment regarding nighttime evacuation assumption and congestion); AR 2292-2293 (addressing comment regarding residents who would evacuate even if not under evacuation order); and AR 1793-1795 and 3752-3753 (addressing evacuation performance standard). Accordingly, the Court does not find a violation of CEQA based on comment requirements.

c. ***CEQA Requirements re: Disclosure of Inconsistencies***

Petitioners argue the EIR failed to disclose the project's inconsistency with the general plan. OB at 36. Petitioners argue the general plan imposes mandatory policies for development, including density restrictions. *Id.* Petitioners argue the 2022 recirculated EIR states the project is consistent with the general plan, and in doing so swept under the rug that the project is inconsistent. *Id.*, and Reply at 25, citing CEQA Guidelines § 15125(d); *Napa Citizens for Honest Gov. v. Napa County Bd. Supervisors* (2001) 91 Cal.App.4th 342, 381, 386-87; AR 989, 991-995.

Respondents argue petitioners conflate their argument that the project is inconsistent with the general plan with CEQA's requirements to evaluate plan inconsistencies. Opp. at 45-46, citing *The Highway 68 Coalition v. County of Monterey* (2017) 14 Cal.App.5th 883, 894, AR 3331-3358, AR 561-564. According to respondents, the project is consistent with the general plan because it was certified as an essential housing project, and so the City was not required to analyze and disclose any claimed inconsistencies. *Id.*

Whether the City can be found to have violated CEQA on this basis is intertwined with the second and third causes of action in the FAP regarding alleged inconsistencies with the general plan. Accordingly, this claim is discussed in connection with the second and third causes of action below.

d. ***Impacts Analysis***

The FAP alleges the EIR fails to disclose, analyze and/or mitigate biological resource impacts, impacts regarding wildfire and wildfire safety, and transportation and traffic. As noted by respondents, the petitioners do not argue the substance of the final recirculated EIR's analysis is inadequate. Opp. at 38. Rather, the petitioners challenged the City's alleged failure to respond to the Center's written comments (which is discussed above). *Id.* Thus, argue respondents, petitioners forfeited their legal challenge as to the substance or adequacy of the wildfire and evaluation analysis by not raising it in their opening brief. *Id.* Petitioners do not appear to rebut this on reply. Accordingly, the Court does not find a violation of the CEQA on this basis.

Violation of State Planning And Zoning Law – Inconsistency with General Plan (2nd COA)

Petitioners' FAP alleges that when the City approved the project it did not amend the general plan; that the project is inconsistent with general plan policy adopted by voter initiative ("Measure N"), which

requires certain land use changes be approved by a vote of the people; and the City abused its discretion and violated state planning and zoning law by approving a project inconsistent with the City's general plan. FAP ¶¶ 101-104. Petitioners bear the burden to establish inconsistency between the project and the plan. *Cal. Native Plant Soc. v. City of Rancho Cordova* (2009) 172 Cal.App.4th 603, 639.

The City and HomeFed assert in opposition that this cause of action is time-barred. Response Brief ("RB") at 20. They also argue this cause of action is meritless because state housing laws (the density bonus law and Gov. Code section 3937) authorize the essential housing program urgency ordinance no. 592 ("ordinance"), and the cause of action is meritless because substantial evidence in the record supports the City's consistency findings. *Id.* at 22-26, 27-36.

Time Bar

HomeFed asserts in its answer that the limitations period in Government Code section 65009 applies to bar the second cause of action. HomeFed Answer, 11th Aff. Def. ROA # 59. The City did not cite section 65009 in its statute of limitations affirmative defense. Answer, 8th Aff. Def., ROA # 69.

The City and HomeFed have the burden to show the statute of limitations bars this action. *Pollock v. Tri-Modal Distr. Services* (2021) 11 Cal.5th 918, 947. Both HomeFed and the City argue the 90-day statute of limitations period applies to commence an action to challenge a legislative body's decision "on the matters listed in Sections 65901 and 65903, or to determine the reasonableness, legality, or validity of any condition attached to a variance, conditional use permit, or any other permit;" and "[c]oncerning any of the proceedings, acts, or determinations taken, done, or made prior to any of the decisions" in the statute. Gov. Code § 65009(c)(1)(E) & (c)(1)(F). RB at 13, 20-22.

The state planning and zoning law (Gov. Code §§ 65000 *et seq.*) contains a section with general provisions, which includes a time limitations provision on bringing actions to challenge decisions by a legislative body regarding general or specific plans, zoning ordinances, regulations attached to specific plans, development agreements, variances, and permits. Gov. Code § 65009(c)(1).

HomeFed and the City argue the petitioners challenge the urgency ordinance that adopted the essential housing program, which occurred in August 2021, and the City planning director's final decision to certify Fanita Ranch as an essential housing project, which occurred on December 27, 2021. RB at 20-21, citing OB at 20-28, AR 3961-3962, AR 1773-1779, 1779-1782. To support their position, HomeFed and the City rely on *Venice Coalition*, which involved a ministerial process through a specific plan in which the *Venice Coalition* petitioners challenged the specific plan. *Venice Coalition to Preserve Unique Community Character v. City of Los Angeles* (2019) 31 Cal.App.5th 42.

Here, HomeFed and the City have not met their burden to show the 90-day statute of limitations period applies. The FAC and record show petitioners challenge a specific land use approval, not merely a ministerial approval. Unlike *Venice Coalition*, the petitioners here challenge the final land use approval during which the City adopted findings of fact to state the project was consistent with the general plan. AR 561-64, Reply at 19-20. The petitioners are not challenging the planning director's December 27, 2021 certification. Even though petitioners discuss the underlying ordinance and certification in their

opening brief, this does not necessarily transform the crux of their challenge to the land use approval. Rather, such discussion may reasonable be inferred as providing support context and information to their timely challenge of the final land use approval that occurred on September 14, 2022, after which they filed suit within the 90-day period on October 14, 2022. AR 561-564; ROA # 1. Consequently, the 90-day limitations period does not bar the second cause of action.

Whether a General Plan Amendment Was Required or Whether State Housing Laws Authorize the Essential Housing Program Urgency Ordinance

As to the merits of the second cause of action, the parties present two starkly different positions and legal theories in this case. Petitioners assert the City committed fundamental legal error by using the certification as an excuse to avoid the need for a general plan amendment, and in doing so violated state planning and zoning law. OB at 19-26; Reply at 10-11. Petitioners argue the City's certification does not fit within the state land use hierarchy, and the City and HomeFed's attempts to rely on laws and standards outside the hierarchy of the general plan does not mean they proceeded in the manner required by law. Pet. Supp. Brief [ROA # 156] at 2-5; Reply at # 140 (if a local agency fails to notify a project applicant of objective requirements, the project is "deemed consistent ... only when substantial evidence supports the Project's consistency" with the general plan's objective standards," citing Gov. Code § 65589.5(j)(1), (f)(4)).

In contrast, the City and HomeFed argue that certain laws authorize the City to bypass general plan amendment requirements, and that the project may be "deemed consistent" under state housing laws, such as the Housing Accountability Act. RB at 23-25, 27-28, 36. The City argues the urgency ordinance waived or superseded the general plan's guiding principle standard for minimum lot sizes, and that this was authorized. City Supp. Brief [ROA # 166] at 1-2. The City points to the density bonus law as an example of a project inconsistent with development standards, to show that like the density bonus law, the ordinance here likewise does not violate the general plan. RB at 11, 22-25, citing Gov. Code § 65915, *Bankers Hills 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 771; City Supp. Brief at 3-4 (arguing the ordinance also is being used to satisfy the state laws re: provision of affordable housing) and citing AR 3966, AR 14621, 1767-1768; 1770-1771. The City also argues the director's certification of the project fits within the general plan land use hierarchy. City Supp. Br. at 4-5. HomeFed joins in the City's arguments. ROA # 165 at 1. HomeFed argues the Housing Accountability Act ("HAA") applies to this project and mandates approval of this project. ROA # 165. HomeFed argues that an applicant who receives incentives, concessions or waivers under the Density Bonus Law does not mean a project is inconsistent with a general plan. Supp. Br. at 3, citing § 65589.5(j)(3). Thus, argues HomeFed, a project that provides sufficient affordable housing under the ordinance may waive City development standards, do not require amendment and are deemed compliant with the general plan. *Id.* at 3-4. The City joins in HomeFed's arguments. ROA # 166 at 1.

The City and HomeFed's position have flaws that appear fatal to defend against the challenges raised by petitioners in the FAC. Although the City urges that the certification fits in the land use hierarchy the City does not clearly explain where and how it fits, and, in circular fashion, cites to the ordinance to state a certification is deemed in compliance and consistent with the General Plan Land Use and Housing Elements. City Supp. Br. at 4-5, citing AR 3961-3962 [Ord. 592 § 4.D.1]. The fallacy with HomeFed's

argument is that concluding a particular basis for a project is not inconsistent with the general plan does not necessarily mean that a project is therefore consistent with a general plan. Indeed, as petitioners have aptly noted, the Housing Accountability Act restricts local governments from *denying* certain housing applications; it does not mandate local government *approvals* of projects. Reply at 15, citing Gov. Code § 65589.5(a)(2)(K), (d)(2)&(d)(5) & (j)(1). This distinction is material and is one which the City's and HomeFed's arguments do not convincingly refute.

Moreover, neither the Density Bonus Law, including section 65915(n), nor the Housing Accountability Act are mentioned in the City's findings of fact and statement of overriding considerations on September 14, 2022. AR 561-564. HomeFed expressly did not seek any incentives, waivers or concessions under the Density Bonus Law. AR 3992. The City and HomeFed's arguments relying on these bases after the findings of fact were made justifying approval the project are thus unpersuasive.

At oral argument, City and HomeFed emphasized that the ordinance no. 592 is essentially the local ordinance version of the density bonus law that gave it express statutory authority to proceed with its essential housing program based on Government Code section 65915(n). This argument also is unconvincing, as it does not address the fact that the City's most recent housing element acknowledged that it removed the prior density bonus program ordinance from the municipal code to ensure continued compliance with the state's density bonus requirements. RJN, City of Santee Sixth Cycle Housing Element (Ex. A), p.46; Santee Municipal Code § 13.26.010 (City implements the housing element of the general plan under its density bonus provision). City's arguments attempting to rebut petitioners' showing on this basis are unconvincing. City Supp. Br. at 3-4. Accordingly, petitioners have met their burden to show City abused its discretion and did not proceed in the manner required by law. The petition as to the second cause of action is granted.

Violation of Subdivision Map Act – Inconsistency With General Plan (3rd COA)

Petitioners' FAP alleges the City violated state law requirements by "approving a vesting tentative map for the Project" inconsistent with the City's general plan requirements regarding issues such as density, transportation, roadway improvements, minimum lot sizes, planning requirements, park dedication and specific amenities. FAP ¶¶ 105-107. Petitioners reference the Subdivision Map Act in just one section of their opening brief. OB at 17 (stating that the Subdivision Map Act "likewise mandates that subdivision approvals, including approvals of vesting tentative maps, must be consistent with the applicable general plan.") The City and HomeFed also mention this Subdivision Map Act only once, in arguing that the general plan claims are meritless because state housing laws authorize the essential housing program urgency ordinance. RB at 22.

At oral argument, petitioner acknowledged the third cause of action for violation of the Subdivision Map Act rises or falls with the second cause of action for violation of the State Planning and Zoning Law. See also e.g., Reply at 6, 13, 17-18, 25 (tying arguments regarding the Subdivision Map Act to its earlier arguments regarding the State Planning and Zoning Law), citing Gov. Code § 66473.5 (general requirement that tentative map or parcel map be consistent with the general plan or specific plan). The Subdivision Map Act is found in Title 7, Planning and Land Use, Division 2, Subdivisions. Gov. Code, §§

66410 *et seq*. In line with the reasoning as to the second cause of action, petitioners' third cause of action for violation of the Subdivision Map Act is granted.

Because the Court found general plan inconsistences under the second and third causes of action, the EIR failed to disclose those inconsistencies. Accordingly, petitioners' first cause of action for violation of the CEQA is granted based on the failure to discuss inconsistencies.

Violation of Elections Code – Approval of Project Despite Qualifying Referendum (5th COA)

Petitioners assert that under the Elections Code, the City had the option of either repealing the ordinance or submitting it to the voters for approval or rejection. MPA at 9, citing Elec. Code § 9241. They argue state law prohibits local jurisdictions from approving the same or similar legislation for a one-year period after a referendum qualified for the ballot is either passed by a vote or the referendum approval is rescinded. OB at 29, citing Cal. Const. art 4 § 1, Elec. Code § 9241. The FAP alleges the City violated the Elections Code by removing a qualified certified referendum about the project from the November 8, 2022 ballot, and then readopting the project (on Sept. 14, 2022) well before one year elapsed from the City's May 25, 2022 repeal of the project approvals. FAP ¶ 115, OB at 30.

The Elections Code's section 9241 states:

> If the legislative body does not entirely repeal the ordinance against which the [referendum] petition is filed, the legislative body shall submit the ordinance to the voters, either at the next regular municipal election occurring not less than 88 days after the order of the legislative body, or at a special election called for the purpose, not less than 88 days after the order of the legislative body. The ordinance shall not become effective until a majority of the voters voting on the ordinance vote in favor of it. *If the legislative body repeals the ordinance or submits the ordinance to the voters, and a majority of the voters voting on the ordinance do not vote in favor of it, the ordinance shall not again be enacted by the legislative body for a period of one year after the date of its repeal by the legislative body or disapproval by the voters.*

Elec. Code § 9241, emphasis added.

Here, petitioners assert the City "repealed" the Fanita Ranch Project approvals on May 25, 2022. FAP ¶ 113, 115, OB at 29, citing AR 24151-53, 1595-99, 1609-12. The City also acknowledges that on May 25, 2022, the City "adopted a resolution setting aside all prior project approvals on May 25, 2022 — including the Final REIR certification and the 2020 GPA approval — and subsequently filed its return. (AR 1767; RJN Ex. 9 [Fanita Ranch III Initial Return to Peremptory Writ].)" RB at 15. City and HomeFed argue, however, that section 9241 does not apply under the circumstances of this case because it makes no sense to have a referendum for legislation that no longer existed, since the Court ordered the prior EIR invalid and to be set aside. Yet section 9241 makes no exception for when a judicial body directs a city to rescind an approval pursuant to a writ.

City and HomeFed also argue the one-year delay required by Elections Code section 9241 would be inconsistent with the expedited processing timeframes for housing developments under the Housing Accountability Act and Housing Crisis Act (SB 330). RB at 38-39. In accordance with the policy reasons

explained above, these sections likewise do not apply and cannot form the basis for non-compliance with the Elections Code here. The petition on the third cause of action is granted.

Conclusion

For the reasons stated, petitioners' first amended petition for writ of mandate on the first, second, third and fifth causes of action in the complaint is **GRANTED**.

The minute order is the order of the Court.

Petitioner to prepare the proposed writ. The Clerk to serve notice.

Katherine A. Bacal

Judge Katherine A. Bacal

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
Central
330 W. Broadway
San Diego CA 92101

SHORT TITLE: PRESERVE WILD SANTEE VS CITY OF SANTEE [IMAGED]

CLERK'S CERTIFICATE OF SERVICE BY MAIL	CASE NUMBER: **37-2022-00041478-CU-MC-CTL**

I certify that I am not a party to this cause. I certify that a true copy of the 08/09/2024 Minute Order was mailed following standard court practices in a sealed envelope with postage fully prepaid, addressed as indicated below. The mailing and this certification occurred at San Diego, California on 08/12/2024.

Clerk of the Court, by: S. Christensen , Deputy

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FILED
San Diego Superior Court
Central Division

OCT 01 2024

Clerk of the Superior Court
By: A. Yim, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

PRESERVE WILD SANTEE, CENTER FOR BIOLOGICAL DIVERSITY, ENDANGERED HABITATS LEAGUE, and CALIFORNIA CHAPARRAL INSTITUTE

Petitioners,

v.

CITY OF SANTEE, CITY OF SANTEE CITY COUNCIL, and DOES 1 through 20, inclusive,

Respondents,

HOMEFED FANITA RANCHO, LLC, and DOES 21 through 40, inclusive,

Real Parties in Interest.

Case No. 37-2022-00041478-CU-MC-CTL

[~~PROPOSED~~] JUDGMENT

Action Filed: October 14, 2022
Trial Date: June 14, 2024
Department: Dept. C-63
Judge: Hon. Katherine Bacal

Petitioners Preserve Wild Santee, Center for Biological Diversity, Endangered Habitats League, and California Chaparral Institute ("Petitioners") by the above-captioned action challenged the September 14, 2022 decision of the City of Santee and the City of Santee City Council ("Respondents") to re-approve the Fanita Ranch Project ("Project"), adopt findings, adopt resolutions approving a vesting tentative map, a development plan, and other approvals for the Project, and certify an Environmental Impact Report ("EIR") for the Project. The matter came on for hearing on June 14, 2024, in Department C-69 of the above-captioned court, the Honorable Katherine Bacal, presiding. Appearances were as noted in the record. The Court having reviewed the record of proceedings in this matter and having heard oral argument and fully considered the arguments of all parties, both written and oral, and after taking the matter under submission, issued a ruling by Minute Order on August 9, 2024 ("Order"), a copy of which is attached hereto as Exhibit A, and incorporated herein by reference.

For the reasons set forth in the Order,

IT IS NOW ORDERED, ADJUDGED, AND DECREED that:

1. Judgment is hereby entered in favor of Petitioners, Preserve Wild Santee, Center for Biological Diversity, Endangered Habitats League, and California Chaparral Institute, and against Respondents City of Santee and City of Santee City Council, and Real Party in Interest HomeFed Fanita Rancho, LLC.

2. The Peremptory Writ of Mandate attached hereto as Exhibit B shall issue from this Court, ordering Respondents to, *inter alia*:

   a. Set aside and vacate in its entirety Resolution No. 112-2022 of the City Council for the City of Santee Certifying the Revised Environmental Impact Report (SCH # 2005061118), Including the Recirculated Sections of the Revised EIR (except for chapter 4.18 "Wildfire), for the Fanita Ranch Project; Adopting Findings of Fact and a Statement of Overriding Considerations Under the California Environmental Quality Act; Adopting a Mitigation Monitoring and Reporting Program; and Approving the Project;

   b. Set aside and vacate in its entirety Resolution No. 113-2022 of the City Council of the City of Santee, California Approving the Application of HomeFed Fanita

Rancho LLC for Fanita Ranch Vesting Tentative Map TM2022-1 for the Subdivision of Approximately 2,638 Acres into 1,467 Lots to Develop the Fanita Ranch Master Planned Community Located North of the Terminus of Fanita Parkway in the Fanita Ranch Planned Development Area;

c. Set aside and vacate in its entirety Resolution No. 114-2022 of the City Council of the City of Santee, California Approving the Application of HomeFed Fanita Rancho LLC for Fanita Ranch Development Plan and Development Review Permit DR2022-4 for the Subdivision of Approximately 2,638 Acres into 1,467 Lots to Develop the Fanita Ranch Master Planned Community Located North of the Terminus of Fanita Parkway in the Fanita Ranch Planned Development Area;

d. Set aside and vacate in their entirety any and all permits, entitlements, or other land use approvals issued in reliance on the above-described Project environmental documents or land use approvals that the Court has commanded be set aside.

3. It is declared and adjudged that, consistent with and for the reasons set forth in the Court's Order, Respondents' actions in approving the Project and certifying the EIR (except chapter 4.18 "Wildfire) violated the State Planning and Zoning Law, the Subdivisions Map Act, the Elections Code, and the California Environmental Quality Act.

4. Petitioners are entitled to recover costs in an amount to be determined. This Court reserves jurisdiction to hear post-trial issues matters, including the award costs and attorney's fees.

5. Pursuant to Public Resources Code section 21168.9(b), the Court shall retain jurisdiction over these proceedings by way of a return to the Peremptory Writ of Mandate until such time as this Court determines that the City has complied with the terms of the writ.

6. Nothing in this Judgment directs Respondents to exercise their discretion in any particular way.

DATED: 10/1/24

SAN DIEGO COUNTY SUPERIOR COURT

By: Hon. Katherine Bacal
Judge of the Superior Court

PEREMPTORY WRIT OF MANDATE

FILED
San Diego Superior Court
Central Division

OCT 01 2024

Clerk of the Superior Court
By: A. Yim, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

PRESERVE WILD SANTEE, CENTER FOR BIOLOGICAL DIVERSITY, ENDANGERED HABITATS LEAGUE, and CALIFORNIA CHAPARRAL INSTITUTE

Petitioners,

v.

CITY OF SANTEE, CITY OF SANTEE CITY COUNCIL, and DOES 1 through 20, inclusive,

Respondents,

HOMEFED FANITA RANCHO, LLC; and DOES 21 through 40, inclusive,

Real Parties in Interest.

Case No. 37-2022-00041478-CU-MC-CTL

~~[PROPOSED]~~ **PEREMPTORY WRIT OF MANDATE**

Action Filed: October 14, 2022
Trial Date: June 14, 2024
Department: Dept. C-63
Judge: Hon. Katherine Bacal

TO RESPONDENTS CITY OF SANTEE AND CITY OF SANTEE CITY COUNCIL:

Judgment having been entered in this proceeding, ordering that a peremptory writ of mandate be issued from this Court:

IT IS NOW ORDERED that, promptly after service of this Peremptory Writ of Mandate upon Respondents,

1. Respondents shall:

   a. Set aside and vacate in its entirety Resolution No. 112-2022 of the City Council for the City of Santee Certifying the Revised Environmental Impact Report (SCH # 2005061118), Including the Recirculated Sections of the Revised EIR (except for Chapter 4.18 "Wildfire"), for the Fanita Ranch Project; Adopting Findings of Fact and a Statement of Overriding Considerations Under the California Environmental Quality Act; Adopting a Mitigation Monitoring and Reporting Program; and Approving the Project;

   b. Set aside and vacate in its entirety Resolution No. 113-2022 of the City Council of the City of Santee, California Approving the Application of HomeFed Fanita Rancho LLC for Fanita Ranch Vesting Tentative Map TM2022-1 for the Subdivision of Approximately 2,638 Acres into 1,467 Lots to Develop the Fanita Ranch Master Planned Community Located North of the Terminus of Fanita Parkway in the Fanita Ranch Planned Development Area;

   c. Set aside and vacate in its entirety Resolution No. 114-2022 of the City Council of the City of Santee, California Approving the Application of HomeFed Fanita Rancho LLC for Fanita Ranch Development Plan and Development Review Permit DR2022-4 for the Subdivision of Approximately 2,638 Acres into 1,467 Lots to Develop the Fanita Ranch Master Planned Community Located North of the Terminus of Fanita Parkway in the Fanita Ranch Planned Development Area;

   d. Set aside and vacate in their entirety any and all permits, entitlements, or other land use approvals issued in reliance on the above-described Project

environmental documents or land use approvals that the Court has commanded be set aside.

2. Respondents are further ordered to suspend all project activity that could result in any change or alteration to the physical environment unless and until Respondents have corrected the deficiencies identified in the Court's Judgment and attached August 9, 2024 Order; reconsidered an EIR certification determination and findings relative to the project; and brought their determination and findings into compliance with the requirements of the California Planning and Zoning Law and CEQA.

3. Respondents are further ordered to file and serve a return to the writ no later than 60 days after service of this writ. The return shall specify the actions taken to comply with the terms of this Peremptory Writ of Mandate.

4. The Court shall retain jurisdiction over these proceedings by way of a return to this Peremptory Writ of Mandate pursuant to Public Resources Code section 21168.9(b) until such time as this Court determines that the City has complied with the terms of this writ.

5. Nothing in this Peremptory Writ of Mandate directs Respondents to exercise their discretion in any particular way.

THE FOREGOING PEREMPTORY WRIT OF MANDATE ISSUES IMMEDIATELY.

DATED: 10/01/2024

SAN DIEGO SUPERIOR COURT

By: _____
CLERK OF THE SUPERIOR COURT

Appendix T. Memorandum

BEST BEST & KRIEGER LLP
ATTORNEYS AT LAW

Memorandum

To: City of Santee

From: BBK

Date: February 20, 2025

Re: *Density Bonus Law Waivers and Essential Housing Program Certification for the Fanita Ranch Project, Santee, California*

I. OVERVIEW

The purpose of this memorandum is to provide the legal support to the City of Santee (City) and its City Council to address the deficiencies noted by the San Diego County Superior Court in the Final Recirculated Revised Environmental Impact Report (Final Recirculated REIR) for the Fanita Ranch project (Fanita Ranch or Project). Specifically, the trial court granted relief to petitioners based on General Plan inconsistencies,[1] highlighting the need for a clearer explanation of how the Project approvals align with the City's General Plan land use hierarchy, particularly with respect to reliance on the State Density Bonus Law (DBL) (Gov. Code, § 65915) and the Housing Accountability Act (HAA) (Gov. Code, § 65589.5). Additionally, the trial court found that the City must better articulate how the Project's processing under the Essential Housing Program conforms to the General Plan and land use hierarchy.

This memorandum provides the legal analysis to support the City's resolution of the identified deficiencies. As to the DBL, it demonstrates that the City may find that the Project is entitled to mandatory waivers, which eliminate any General Plan constraints, such as minimum lot size standards and the requirement for a golf course/lake outlined in the Guiding Principles for Fanita Ranch. Further, the analysis explains how the City may find that the Project qualifies for incentives due to its significant contribution to affordable and senior housing.

The memorandum also examines the Project's processing under the City's Essential Housing Program and the City's recent amendments to that program. It clarifies how the program lawfully extends DBL benefits to projects addressing critical housing needs during the declared housing crisis. It also discusses the applicant's entitlement to rely on the Essential Housing Program under Senate Bill (SB) 330 and the Housing Crisis Act of 2019, which freezes applicable development regulations at the time a preliminary housing application is submitted.

The memorandum also explains that because the City may find that the Project qualifies for mandatory waivers, which renders General Plan constraints inapplicable, and is therefore deemed consistent under the City's Essential Housing Program, the City may find that the Project

[1] The ruling did not specify the precise General Plan inconsistencies found, but recited the inconsistencies alleged by petitioners and identified the need for a clearer explanation of how the Project approvals align with the General Plan's land use hierarchy. (See Ruling, at pp. 7-8.)

does not require a General Plan Amendment or any other legislative act, and so a public vote on the Project under Measure N is not required.

The memorandum first addresses the application of the DBL to the project, clarifying how its provisions resolve alleged General Plan inconsistencies and support the project's compliance with state housing laws. Second, it addresses the Essential Housing Program and related amendments, explaining how the Program extends DBL benefits to meet critical housing needs.

This memorandum addresses the trial court's ruling and its implications beyond the specific requirements of the California Environmental Quality Act (CEQA). Under CEQA, the environmental review process mandates an assessment of whether a proposed project may result in significant environmental impacts due to conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. However, the trial court's decision raised considerations that extend beyond CEQA's requirements, warranting further analysis and extending into consistency/inconsistency with the City's General Plan and the application of state DBL. For these reasons, this memorandum provides an analysis of such issues for completeness.

II. Factual Background

The Fanita Ranch project initially sought a General Plan Amendment, Specific Plan, Development Agreement, and Rezoning approval, as detailed in the August 2020 Final Revised EIR.

However, with the 2022 Final Recirculated REIR, the proposed project instead requested EIR certification and approvals for a Development Plan, Vesting Tentative Map, Development Review Permit, and Conditional Use Permits. This change reflected the declared housing crisis and impact of state housing laws—including the State Density Bonus Law (DBL) (Gov. Code § 65915 et seq.) and the HAA—which in certain circumstances may limit the City's discretion to impose legislative entitlements to further statewide housing objectives. The change also reflected the City's adoption of its Essential Housing Program under the authority granted by the DBL to streamline and spur housing development.

The City certified the 2022 Final Recirculated REIR and approved the Project on September 14, 2022, and an action to challenge those approvals was filed. The court granted the challenge in part, finding that the 2022 Final Recirculated REIR failed to adequately disclose the Project's purported land use inconsistencies.

The proposed Project's physical characteristics and requested entitlements have not changed compared to the 2022 Final Recirculated REIR. However, the Project attributes that entitle it to DBL benefits, as opposed to those benefits available under the Essential Housing Program, were not plainly detailed in the 2022 Project approval. Those attributes include the provision of 445 senior housing units within the Project's Active Adult Community, as well as the development of 150 low-and moderate-income units and $2.6 million contribution towards the provision of very-low-income units.

On February 12, 2025, the City Council adopted an Amendment to Urgency Ordinance No. 592 (the ordinance that adopted the Essential Housing Program) to address the Court's ruling. The Amendment explains that the Essential Housing Program is authorized by the DBL and other state

housing laws. It also clarifies that projects that follow its procedures and meet its strict requirements are deemed to be in compliance with the Santee General Plan through the use of density bonus units, concessions, incentives, and/or waivers to eliminate any inconsistency with inconsistent development standards or regulations, as appropriate, to allow certified housing projects to develop at the density and with the amenities proposed. Pursuant to the DBL, the Amendment explains the granting of the bonus, concessions, incentives, or waivers do not require an amendment to the Santee General Plan or any other legislative action/approval, as any such regulations do not apply to the Project. (Gov. Code, §§ 65915(f)(5), (j)(1).) The Fanita Ranch Project remains certified as an Essential Housing Project under the City's Essential Housing Program.

III. The Density Bonus Law

A. Density Bonus Law Background and Relationship to Land Use Hierarchy

Originally enacted in 1979, California's Density Bonus Law (Gov. Code, §§ 65915, et seq.) offers advantages for applicants/owners/developers that provide market-rate, affordable, and senior housing projects. The Legislature stated that the DBL is to be "interpreted liberally in favor of producing the maximum number of total housing units." (Gov. Code, § 65915, subd. (r).) Projects that meet the eligibility requirements of DBL are entitled to (1) a density bonus (or bonuses) above the maximum allowable residential density, (2) incentives/concessions, (3) development standard waivers, and (4) significantly reduced parking requirements. (Gov. Code, § 65915 (b).) The DBL requires cities to adopt an ordinance to implement the state law; however, the failure to do so does not relieve a city from complying with the statute. (Gov. Code, § 65915, (a)(1).)

Under the DBL, a density bonus applies to the maximum allowable residential density, defined as the "greatest number of units allowed by the specific zoning range, specific plan, or land use element of the general plan applicable to the project." (Gov. Code, § 65915 (o)(6).) In a July 2024 Letter of Technical Assistance to the City of Los Angeles, the State Department of Housing and Community Development (HCD) stated: "For the purposes of the S[tate] DBL, any hierarchy between planning documents is flattened" to permit the greatest number of housing units.[2] (Emphasis added.) It thus appears that according to HCD, the DBL eliminates the "hierarchy" in regulatory planning documents by flattening any prior hierarchy.

The DBL requires an agency to grant certain incentives or concessions, and waive or reduce development standards that would have the effect of physically precluding the construction of a housing development at the density, or with the requested incentives, permitted by the DBL, unless one or more of the listed exceptions apply. (Gov. Code, § 65915 (d)(1)(B)-(C), (e)(1).) Density bonus benefits do not require a general plan amendment, local coastal plan amendment,

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[2] See Letter to City of Los Angeles, *City of Los Angeles Density Bonus Law Implementation – Letter of Technical Assistance* (July 31, 2024). https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/HAU/los-angeles-hau399-ta-qcondition-073124.pdf

HCD is the state agency responsible for accountability and enforcement of state housing laws, including DBL, and provides guidance on implementation and enforcement of state housing laws, including DBL. (Gov. Code, § 65585 (j)(3).)

zoning change, or other discretionary approval. (Gov. Code, §§ 65915(f)(5), (j)(1).) As HCD explained in another Letter of Technical Assistance, explained:

> A fundamental aspect of the S[tate] DBL is that it allows a project to exceed the maximum allowable densities expressed in the General Plan (i.e., a density bonus) and to exceed certain development standards that may be expressed in the General Plan (i.e., maximum floor area ratios, building heights, etc.). SDBL has, since its inception, allowed developments to be inconsistent with the General Plan for the explicit purpose of producing affordable housing.[3]

(See also, *Wollmer v. City of Berkeley* (2011) 193 Cal.App.4th 1329, 1349 [stating that waived development standards are not applicable for determining consistency with general plan designations or policies or zoning designations and regulations]; and *Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 783 [stating that agency is preempted from denying a project for inconsistency with a waived development standard].)

Section 65915, subdivision (n) provides that an agency may award a development extra units or benefits or extend density bonus benefits to developments that do not meet the minimum requirements of the DBL. The Legislature has also directed that DBL be "interpreted liberally in favor of producing the maximum number of total housing units." (Gov. Code, § 65915 (r).)

B. The DBL applies because the Project "seeks a density bonus"

The DBL applies when a qualifying project "seeks a density bonus" for a housing development. (Gov. code § 65915(a)(1).) The statute defines a "density bonus" as "a density increase over the otherwise maximum allowable gross residential density as of the date of application by the applicant to the city, county, or city and county, or, if elected by the applicant, a lesser percentage of density increase, including, but not limited to, *no increase in density."* (Gov. Code, § 65915 (f), emphasis added.) The definition of "density bonus" thus explicitly includes projects, like Fanita Ranch, that do not seek to increase density, but seek other benefits of the DBL, such as incentives, concessions or waivers.[4] The Project seeks a "density bonus" within the meaning of the DBL.

C. Project's Entitlement to Mandatory DBL Benefits

The City may legally find that the proposed Project's provision of a qualifying senior citizen housing development entitles it to density bonus benefits under the DBL. (Gov. Code, § 65915(b)(1)(C), *Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 832-

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[3] See Letter to County of El Dorado, *Cameron Park Housing Project – State Density Bonus Law and AB 2334 – Letter of Technical Assistance* (March 9, 2023). Cameron Park Housing Project – State Density Bonus Law and AB 2334 – Letter of Technical Assistance

[4] The Project does not seek an increase in density because under the General Plan, there is no density limit for the Project site. With respect to the General Plan, the site is designated Planned Development (PD), which provides for "[m]ixed-use development potential including employment parks, commercial, recreational, and various densities of residential development pursuant to a development plan and entitlements being approved by the City Council." (Santee General Plan, Land Use Element, p. 1-29. The designation itself "does not, in itself, limit the extent or mix of development to occur…" (Santee General Plan, p. 1-29.)

833) ("*Friends of Lagoon Valley*"). Specifically, the Project would develop 445 age-restricted units within an Active Adult community. (See Section 3.3.1.4 of Final Recirculated REIR.)

Under the DBL, a project is eligible for a density bonus, waiver, and reduced parking benefits if it qualifies as a "senior citizen housing development, as defined in Sections 51.3 and 51.12 of the Civil Code." (Gov. Code, § 65915, subds. (b)(1)(C), (e)(1), (f)(3)(A), (p)(1).) Civil Code section 51.3(b)(4) defines a "senior citizen housing development" as "a residential development developed, substantially rehabilitated, or substantially renovated for, senior citizens that has at least 35 dwelling units." (*Id.,* emphasis added.) In this context, "senior citizens" means people who are 55 years of age or older. (Civ. Code, § 51.3(b)(1).) The Project provides considerably more "senior citizen housing development" than required by law (compare 35 units to the Project's 445 age-restricted units within an Active Adult community in Fanita Ranch).

In *Friends of Lagoon Valley,* the First District Court of Appeal clarified the DBL benefits that flow from providing "senior citizen housing development" regardless of project size:

> "The statute states that a developer is entitled to a density bonus if it agrees to construct a "senior citizen housing development as defined in Sections 51.3 and 51.12 of the Civil Code." (Gov. Code, § 65915, subd. (b)(3) [2005 version].) Under Civil Code section 51.3, "'[s]enior citizen housing development' means a residential development developed, substantially rehabilitated, or substantially renovated for, senior citizens that has at least 35 dwelling units." (Civ. Code § 51.3, subd. (b)(4).) Here, Triad agreed to provide a senior citizen housing development of 100 units—nearly three times as many units as were necessary to obtain a density bonus. Thus, pursuant to Government Code section 65915, subdivision (g)(1), Triad was entitled to a density bonus of "at least 20 percent," and the City had discretion to provide a greater bonus. (Gov. Code, § 65915, subd. (n)). …
>
> We recognize that, under our interpretation, the senior housing provision of Section 65915 has the potential to create a windfall for developers in some circumstances. In a large-scale project with development of 2,000 units, for example, a developer would have to build 200 low income units or 100 very low income units to qualify for a density bonus of 20 percent . . . *but could obtain the same density bonus by constructing only 35 units of senior citizen housing*."

Friends of Lagoon Valley, *supra*, 154 Cal.App.4th 807, 832-833 (emphasis added.)

The Court in *Friends of Lagoon Valley* also found that"[no]thing in [the DBL] states or suggests that the density bonus for senior citizen housing could not be applied to the development project as a whole." (See *Friends of Lagoon* Valley, *supra*, 154 Cal.App.4th at 832.)

The Project Description in the Final Recirculated REIR, which has not changed, explains the proposed Project would develop an "Active Adult" neighborhood, which would provide 445 "age-restricted residential uses in a variety of building types with densities ranging from 5 to 25 residential units per acre." (Section 3.3.1.4 of Final Recirculated REIR.) The Project's 445 age-restricted "senior citizen housing" units far surpass the 35 units needed to qualify for the density bonus and waiver benefits under the state DBL. (Gov. Code, § 65915, subds. (b)(1)(C), (e)(1).)

Thus, the City may legally find that the Project is a qualifying density bonus project and is entitled to mandatory density bonus benefits, including a density bonus and waivers of development standards, for meeting the senior housing requirements of Government Code section 65915 (b)(1)(C). (*Id., Friends of Lagoon Valley*, *supra*, 154 Cal.App.4th at pp. 832-833.) DBL benefits are mandatory and do not require discretionary review. (Gov. Code, § 65915 subd. (e)(1).)[5]

The proposed Project would additionally develop 150 low-and moderate-income units on- or off-site and contribute $2.6 million to a City fund for development of very-low-income units. As the court in *Friends of Lagoon Valley* noted, the DBL allows developers to obtain greater density bonus benefits "in exchange for even more low income or senior housing than is provided for in Section 65915." (*Friends of Lagoon* Valley, *supra*, 154 Cal.App.4th at 825-826, Gov. Code, § 65915 (n).)

D. The Project is Entitled to The Project's Entitlement to Mandatory Waivers of Development Standards

To accommodate the proposed Project at the density and with the amenities proposed, the City may conclude that the Project is entitled to under the DBL to waivers of the following General Plan Guiding Principles:

1. Guiding Principle 3, which provides the Planned Development plan "shall contain a mix of house sizes on lot sizes distributed as follows:
   - 6,000 sq. ft. lots – 20 percent of total lots
   - 10,000 sq. ft. lots – 20 percent of total lots
   - 20,000 sq. ft. lots – 60 percent of total lots or greater."
2. Guiding Principle 9, which provides:

   > "The plan shall contain a championship level, minimum 6,800-yard, par 70-75, 18-hole golf course, including support facilities. A hotel/conference complex shall be included in conjunction with the golf-course facility. An alternative plan may also be designated which, in lieu of a golf course and hotel/conference facility, includes a recreational facility based around a man-made lake, using non-reclaimed water, and which is approximately 200 acres in area.

3. Guiding Principle 14, subdivision (e), which provides the plan "shall include a Comprehensive Implementation Element which shall consist of:… (e) A Development Agreement….

1. Legal Principles

For qualifying projects, the DBL requires an agency to waive any development standard that will have the effect of physically precluding project construction at the densities and with the amenities proposed. (Gov. Code, § 65915, subd. (e)(1).) A "development standard" is defined as "a site or construction condition, including, *but not limited to*, a height limitation, a setback

[5] See also Letter to City of Glendale, *Discretionary Review of State Density Bonus Law Waiver Requests – Letter of Technical Assistance.* Department of Housing and Community Development (February 5, 2024) Discretionary Review of State Density Bonus Law Waiver Requests – Letter of Technical Assistance.

requirement, a floor area ratio, an onsite open-space requirement, a minimum lot area per unit requirement, or a parking ratio that applies to a residential development pursuant to any ordinance, general plan element, specific plan, charter, or other local condition, law, policy, resolution, or regulation that is adopted by the local government or that is enacted by the local government's electorate exercising its local initiative or referendum power, whether that power is derived from the California Constitution, statute, or the charter or ordinances of the local government." (Gov. Code, § 65915, subd. (o)(2), emphasis added.)

If the City finds that the Project is subject to the DBL, HCD's technical assistance explains that the granting of appropriate development standard waivers is mandatory and does not require or permit discretionary review.[6] The DBL states: "[I]n no case may a city, county, or city and county apply any development standard that will have the effect of physically precluding the construction of a development meeting the criteria of subdivision (b) at the densities or with the concessions or incentives permitted by this section." (Gov. Code, § 65915 subd. (e)(1).)[7] The City's authority to disapprove waivers is limited to a request that "would have a specific, adverse impact … upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact," or if the waiver "would have an adverse impact on any real property that is listed in the California Register of Historical Resources, or to grant any waiver or reduction that would be contrary to state or federal law." (*Ibid*.)

HCD has advised that an agency is "strictly limited in denying requested development standard waivers, preventing it from applying any development standard that would physically preclude a project as proposed unless doing so would have a specific adverse impact on health or safety (as defined), which could not be mitigated (Gov. Code, § 65915, subd. (e))."[8] As with other DBL benefits, granting waivers does not require a general plan amendment, local coastal plan amendment, zoning change, or other discretionary approval. (See Gov. Code, §§ 65915, subds. (f)(5), (j)(1).)

Interpreting the DBL, the Court of Appeal in *Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775 held that "so long as a proposed housing development project meets the criteria of the Density Bonus Law by including the necessary affordable units, a city may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes 'amenities' beyond the bare minimum of building components."

The Court of Appeal in *Wollmer v. City of Berkeley* (2011) 193 Cal.App.4th 1329, 1349 ("*Wollmer"*) held that "waived zoning standards are not 'applicable'" for purposes of determining

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[6] See also Letter to City of Glendale, *Discretionary Review of State Density Bonus Law Waiver Requests – Letter of Technical Assistance.* Department of Housing and Community Development (February 5, 2024) Discretionary Review of State Density Bonus Law Waiver Requests – Letter of Technical Assistance.

[7] *Id.* ["A development project meeting the requirements of the SDBL is entitled to not only an increase in the number of units allowed on the site (*i.e*., a "density bonus"), but also to a prescribed number of concessions/incentives and any development standard waivers which are necessary to facilitate the project overall."]

[8] Letter to City of Mill Valley, *Blithedale Terrace Mixed-Use Project – Notice of Potential Violation,* Department of Housing and Community Development (January 9, 2023). Blithedale Terrace Mixed-Use Project – Letter of Support and Technical Assistance

"consistency with applicable general plan designations and policies and applicable zoning designations and regulations."

2. Grounds for granting the requested mandatory waivers

The lot size development standard and mix in Guiding Principle 3 would preclude the Project from being built as proposed, as it would limit the number of units allowed to be constructed. Guiding Principle 3 lot size development standard is consistent with the previously approved project in 2007 (the Barratt American Development Plan), which would allow for up to 1,395 residential units on site based on the lot size mix. Based on that previous design, only 1,465 acres of the site would be designated as habitat preserve. The Project's design condenses the previous development footprint to respect existing topography and preserve 1,650.4 acres of the site as habitat. This approach is consistent with other Guiding Principles that encourage "creative product design" and "alternative residential design" as alternatives to conventional lotting across the site. (Guiding Principles 4 and 6.)

Based on the above evidence, if the City determines that the Project is a qualifying project, the Project is entitled to a mandatory waiver of the lot size development standard in Guiding Principle 3 because the applicant has provided documentation showing that imposing this development standard would physically preclude construction of the project's 2,949 to 3,008 units — including the 445 age-restricted senior citizen housing units — as designed and with the amenities proposed. (Gov. Code, § 65915, subds. (e)(1), (o)(2) [providing for waivers of a minimum lot area per unit requirement]; *Bankers Hill 150, supra,* 74 Cal.App.5th at p. 775.)

Also based on the above evidence, if the City determines that the Project is a qualifying project, the Project is entitled to mandatory waivers of Guiding Principles 9 (approximately 200-acre golf course or lake amenity) and 14 (Development Agreement) as it would physically preclude construction of the Project's 2,949 to 3,008 units and Guiding Principle 14 (See also, Gov. Code, § 65915 (e)(1), (o)(2) [providing for waivers of open space requirements and other conditions].)

With respect to Guiding Principle 14's requirement of a Development Agreement, the Second Recirculated Sections of the Final REIR Land Use section confirms that the although the Project's Development Plan does not incorporate a "Development Agreement," it does include a comprehensive implementation element (Chapter 10, Implementation). Here, it appears that the purpose of Guiding Principle 14 is not to avoid or mitigate environmental effects, but instead to ensure that public improvements are constructed concurrently with their anticipated need. The Project's Development Plan addresses phasing, financing, operation, maintenance, administration, implementation, modification, and monitoring of public facilities and improvements, thereby addressing the purpose of the principle. And even if the principle concerned project impacts on the environment, here, the Project's conditions of approval and MMRP ensure that the Project's environmental effects will be mitigated to the extent feasible.

Accordingly, with mandatory waivers and concessions, the City may conclude that the conditions of approval satisfy the requirements of Guiding Principle 14. The Project would not conflict with any Guiding Principle and does not require — or propose — a General Plan Amendment, Specific Plan, Rezone, Development Agreement, or any other legislative act, which can be associated with increased costs. (See Legislative Analyst report, "California's High Housing Costs, Causes and Consequences," March 17, 2015 at p. 17 [A study of jurisdictions in

the Bay Area found that each additional layer of independent review was associated with a 4 percent increase in a jurisdiction's home prices].)

IV. Housing Accountability Act and SB 330

Pursuant to the Housing Accountability Act ("HAA"; Gov. Code § 65589.5) and SB 330, codified at Government Code section 65905.5 and adopted as part of the Housing Crisis Act of 2019, if a proposed housing development project complies with applicable, objective general plan, zoning, and subdivision standards and criteria, the agency may not disapprove a housing development project or require projects be developed at a lower density unless the agency makes specific statutory findings supported by a preponderance of the evidence in the record. (Gov. Code, § 65589.5, subd. (j)(1), 65905.5, subd. (c)(1)).

Additionally, the HAA and SB 330 clarify that the receipt of a density bonus, incentive/concession, waiver, or reduction of development standards pursuant to the DBL is not a valid basis on which to find that a proposed housing development project is inconsistent, not in compliance, or not in conformity with an applicable objective standard or other similar provision. (Gov. Code, §§ 65589.5, subd. (j)(3), 65905.5, subd. (c)(1)). Thus, the City may find that with the required DBL waivers and/or incentives, the Project complies with applicable objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect at the time that the application was deemed complete.

V. Essential Housing Program

A. The Essential Housing Program Extends DBL Benefits to Projects that Meet the Program's Criteria

Since 2021, Urgency Ordinance No. 592, the City's Essential Housing Program, has provided an expedited pathway to increase housing production and improve affordability for eligible projects (City of Santee 2021). However, in the litigation challenging the Fanita Ranch project, the trial court found that the City did not clearly explain how the project approvals under that Program aligned with the established land use hierarchy and state housing laws.

On February 12, 2025, the Santee City Council will take final action on an Amendment to Urgency Ordinance No. 592 to address the trial court's concerns. The amended ordinance explicitly details that the DBL and other state housing laws authorize the City's Essential Housing Program to streamline housing production and enhance affordability by circumventing unnecessarily burdensome governmental and legislative processes.

The amendment emphasizes that the DBL empowers local governments to adopt ordinances that grant density bonuses, incentives, concessions, waivers, and parking reductions beyond those mandated by state law. Specifically, Government Code section 65915, subdivision (n) states:

> "If permitted by local ordinance, nothing in this section shall be construed to prohibit a city county, or city and county from granting a density bonus greater than what is described in this section for a development that meets the requirements of this section or from granting a proportionately lower density bonus than what is required by this section for developments that do not meet the requirements of this section."

This provision, subdivision (n), allows the Essential Housing Program to exceed state requirements, creating opportunities for local flexibility in supporting housing projects. (*Friends of Lagoon Valley, supra,* 154 Cal.App.4th at p. 825.) This ensures that proposed projects can achieve their intended density with the amenities proposed without requiring amendments to the General Plan or other legislative actions. (Gov. Code, §§ 65915, subds. (f)(5), (j)(1).)

State housing laws, including the HAA, mandate that locally authorized density bonus benefits are treated equivalently to those under State law. For example, Government Code sections 65589.5, subdivision (o)(2)(E) and 65655, subdivision (a) provide that local programs extending additional density bonuses or waivers for affordable housing the same as benefits required under the DBL. As discussed above, waived zoning standards are considered not "applicable" to a project (*Wollmer, supra*, 193 Cal.App.4th at p. 1349), and receipt of density bonus benefits are not a basis for a finding of general plan inconsistency. (Gov. Code, 65589.5, subd. (j)(3), 65905.5, subd. (c)(1).) If the City approves incentives, concessions or waivers in accordance with the DBL, then the Housing Accountability Act precludes a determination that the project is inconsistent or non-compliant with the local plans, development standards or policies based on the benefits received under the DBL.

This streamlined approach reinforces the City's commitment to accelerating housing development while maintaining compliance with state housing mandates. Urgency Ordinance No. 592 further strengthens this commitment by controlling over any conflicting City plan or ordinance, and with the City's interpretation afforded the fullest possible weight to the interest, approval, and provision of housing.

B. Legal Precedent Supporting Expanded Local Density Programs

In the Fanita Ranch litigation, questions arose regarding whether Urgency Ordinance No. 592 served as the City of Santee's implementation of the state-mandated provisions of the Density Bonus Law (DBL). For instance, the trial court noted:

> "City and HomeFed emphasized that the ordinance no. 592 is essentially the local ordinance version of the density bonus law that gave it express statutory authority to proceed with its essential housing program based on Government Code section 65915(n)."

(*Ruling, at p. 8.*)

To clarify, the City's Zoning Ordinance, Section 13.26.010, explicitly states that it, "implements the housing element of the General Plan; Sections 65915 through 65918 of the California Government Code; and, in accordance with those general regulations, provides incentives to developers for the production of housing affordable to lower income households, moderate income households and senior citizens." (Gov. Code, § 65915, subd. (a)(1).) This provision ensures that the City is in full compliance with the state-mandated requirements of the DBL.

Urgency Ordinance No. 592 is not the City's version of state DBL. Instead, it is a state-authorized program designed to expand density bonus benefits under the authority of Government Code section 65915, subdivision (n). This provision empowers local jurisdictions to adopt additional density bonus incentives, concessions and waivers through ordinances, in addition to the minimum requirements to implement the DBL. Importantly, Section 65915, subdivision (n)

does not require expanded bonuses or incentives to be incorporated into an agency's density bonus ordinance implementing state law — they may instead be authorized by a separate local ordinance.

The Court in *Banker's Hill* upheld a local program that exceeded the DBL requirements. In *Bankers Hill 150, supra,* 74 Cal.App.5th at p. 771, fn. 6, the Court of Appeal affirmed that local ordinances may exceed state-mandated DBL provisions. Citing *Friends of Lagoon Valley* (154 Cal.App.4th at pp. 824-830), the Court of Appeal noted, "A city's local ordinance may provide for a density bonus or incentives that exceed the Density Bonus Law." (*Id.*)

Bankers Hill considered San Diego's Affordable Homes Bonus Program, adopted in 2016. It exceeded state DBL by offering increased density bonuses and additional incentives to qualifying projects, leading to the entitlement of 2,300 homes within 20 months — a significant improvement over what would have been achieved under state law alone. The program also eliminated parking requirements for certain projects, further boosting housing production. (*Id.*)

The Court of Appeal in *Bankers Hill 150* observed that, by the time the matter was heard, the specific density bonus provisions under state law had been expanded to align with San Diego's local program. (*Bankers Hill 150, supra,* 74 Cal.App.5th at p. 771, fn. 7, referencing AB 2345.) It emphasized that agencies retain the authority to exceed and expand upon state DBL requirements, enabling further innovation in housing production. (*Id.*)

Other municipalities have also established successful local programs,[9] which have been demonstrated to be a lawful and successful means of expanding and extending DBL benefits.

C. The Fanita Ranch Project is a Certified Essential Housing Project

The Essential Housing Program is available to expedite: (1) any new application for a Housing Development Project, (2) any Housing Development Project currently under City review, or (3) any approved, entitled, and/or permitted Housing Development Project not yet built by the date application for certification is made. An application under the Essential Housing Program was submitted for the proposed Project in December 2021. On December 27, 2021, the City's Director of Development Services certified the Project as an Essential Housing Project based on the criteria adopted by the City Council. Nothing has changed concerning the Project's physical or affordable attributes that impacts its certification.

As demonstrated by the certification and project conditions, the Project would address the City's housing crisis by providing a mix of residential and nonresidential uses and a mix of housing types and sizes. A total of 2,949 housing units would be developed if the proposed Project includes a school, or 3,008 units without a school, including 435 moderate-income units and 445 age-restricted senior citizen housing units. The Project would also develop 150 low-and moderate-income units and contribute up to $2.6 million for affordable housing.

Stringent environmental and Santee General Plan consistency criteria established by the Essential Housing Program would be met. The proposed Project would implement mobility improvements, including bus stops, traffic calming, an up to $300,000 contribution to relieve congestion on SR-52, and rideshare/carshare parking. Open space would be conserved. In

[9] *See* Transit Oriented Communities Incentive Program (https://planning.lacity.gov/plans-policies/transit-oriented-communities-incentive-program); HOME-SF (https://sfplanning.org/home-sf#:~:text=The%20HOME-SF%20program%20is%20San%20Francisco%E2%80%99s%20local%20density,and%20up%20to%20two%20extra%20stories%20of%20height.)

addition to preserving 1,650.4 acres in the Habitat Preserve, it would provide at least $300,000 in funding for the management of City-owned natural open space and plant at least 10 trees per acre of land to be developed. Water use would be reduced by connections to recycled or advanced treated water when PDMWD's East County Advanced Water Purification project is completed.

As to energy, air quality, and GHG emissions, the Project's residential units would be all-electric and exceed Title 24 standards by all-electric residential development, implementing heat pump technology, increasing solar production, and expanding ventilation systems. Appliances would be Energy Star rated, electric vehicle chargers would be provided in the Village Center, and solar panels would be installed on accessory buildings and car ports. Wildfire safety would be ensured through implementation of fuel management zones and the Fire Protection Plan (FPP), among the many other measures set forth in the FPP and Wildland Fire Evacuation Plan (see Appendices P1 and P2).

Many miles of trails and sidewalks would be provided, and up to $300,000 would be provided to the City to fund additional improvements to trail facilities. Finally, the proposed Project's extensive park and recreational facilities would exceed the Santee Municipal Code standards by at least 5 percent and provide multi-purpose playing fields and public recreational facilities for Citywide use.

Certification of the Project based on the City's Essential Housing Project Credits Assessment Guide and Checklist demonstrates that it addresses the City's immediate housing needs and furthers Santee General Plan objectives and policies. Therefore, the Project is deemed Santee General Plan consistent under the Essential Housing Program and does not require an amendment to the Santee General Plan or other legislative act for approval. Any Guiding Principles with which the Project is in conflict, including Guiding Principles 3, 9, and 14 (e), are waived under DBL and not "applicable" to the project. (*Wollmer, supra,* 193 Cal.App.4th at p. 1349.) Any conflict is also *not* considered an inconsistency with the General Plan or other regulations under state housing law. (Gov. Code, §§ 65589.5 (j)(3), 65905.5 (c)(1).)

VI. DBL AND SB 330'S LIMITATION ON GROWTH CONTROL MEASURES PREEMPT AND NEGATE MEASURE N

The trial court's ruling noted that petitioners argued a General Plan Amendment (GPA) was required for the Project, which would trigger Measure N's requirement for a public vote prior to approval. (Ruling p. 5.) However, as detailed above, if the City finds that no GPA or other legislative action is required for the Project, Measure N does not mandate a public vote. Measure N also specifically provides that it shall not be construed to interfere with rights to obtain density bonuses or other entitlements available under affordable housing laws.

Measure N added Policies 12.1 through 12.4 to the City's General Plan Land Use Element:

- 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.

- 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.

- Policy 12.3: The City Council shall set any election required by this Objective to the next available general municipal election at no cost to the proponent of the land use change, or set a special election, the cost of which shall be borne by the proponent.

- Policy 12.4: The voter approval requirement of subsection (a) shall not apply where the General Plan amendment is necessary to comply with state or federal law governing the provision of housing, including, but not limited to affordable housing requirements. This exception applies only if the City Council first makes each of the following findings based on substantial evidence in the record: 1) a specific provision of state or federal law requires the City to accommodate the housing that will be permitted by the amendment; 2) the amendment permits no greater density than that necessary to accommodate the required housing; and 3) an alternative site that is not subject to the voter approval requirement in this Policy is not available to satisfy the specific state or federal housing law.

The City Attorney's Impartial Analysis for Measure N noted that judicial interpretation of the measure "may be required to assess the Measure under Government Code section 66300(b)(1)(B)." Section 66300(b)(1)(B), also known as SB 330, appears to include language that would limit a city or its voters through initiative power from enacting or enforcing any development standard that imposes a cap on housing development. It states that with respect to land where housing is an allowable use, the city (defined to include voters through initiative power) "shall not enact a development policy, standard, or condition" that would have any of the following effects: (A) decreasing the intensify of land uses; (B) imposing a moratorium or limitation on housing development; (C) imposing new subjective design standards post January 1, 2020; and (D) places caps or limits on the number of applications or permits during time period. (Government Code §§ 66300, subds. (a)(3), (b)(1)(B)(i), (b)(1)(D)(i) – (iii).) We also note that SB 330 is to be "broadly construed so as to maximize the development of housing within this state." (Gov. Code, § 66300 (e)(2).)

An argument could be made that Measure N conflicts with state housing law and policy and are prohibited. In *Building Industry Assn. v. City of Oceanside* (1994) 27 Cal.App.4th 744, 771, the court held that a proposition conflicting with state housing policy on its face can be invalidated as a matter of law, rendering it invalid from the date of adoption. (See also, *Yes in My*

Back Yard v. City of Culver City (2023) 96 Cal.App.5th 1103, 1112-1120; Gov. Code, §§ 66300, 66301 [extending Section 66300's effect to January 1, 2034].)

Even if not preempted, Measure N does not apply to the Project. First, no public vote is triggered under Policy 12.1. As explained in section III above, neither the General Plan nor the Zoning Ordinance prescribe a density limit for the Project site, so the Project does not "increase the residential density permitted by law." And as explained in section III, with DBL waivers, the Project is permitted onsite; no "increase" in permitted density would occur. (Policy 12.1 (1); Gov. Code, §§ Gov. Code, §§ 65915,subds. (e)(1), (f)(5), (j)(1); 65589.5, subd. (j)(1), (3); *Bankers Hill 150, supra,* 74 Cal.App.5th at p. 783; *Wollmer, supra,* 193 Cal.App.4th 1329, 1349 [waived development standards are not applicable].) Additionally, under the Essential Housing Program, the residential density proposed is permitted and lot size standard waived. Lastly, there is no proposed change in land use category or redesignation to residential, commercial, or industrial. (Policy 12.1(2), (3).)

Second, the Project does not propose changes to the slope criteria, minimum parcel sizes, or lot averaging provisions of the City's General Plan that would permit increased density or intensity under Policy 12.2. As explained in section III(D), if the City finds that the Project is a qualifying project, the Project is entitled to waive the lot size provision of Guiding Principle 3 under DBL. (Gov. Code, § 65915, subds. (e)(1), (n); *Wollmer, supra,* 193 Cal.App.4th 1329, 1349 [waived development standards are not "applicable."]) Further, the Essential Housing Program provides such waivers. No GPA or other legislative action is required for the waiver. (Gov. Code, § 65915, subds. (f)(5), (j)(1).)

Thus, the City can legally find that under the text of Policy 12.4 and state law, including DBL, the voter requirements are inapplicable and preempted. (Gov. Code, §§ 65915, subds. (e)(1), (f)(5), (j)(1); 65589.5, subds. (j)(1), (j)(3).) Additionally, Section 5 of Urgency Ordinance No. 592 makes the findings set forth in Policy 12.4 for Essential Housing Projects:

> "The City Council finds that the adoption of this Ordinance is necessary to comply with state law governing the provision of housing, including but not limited to, Government Code sections 65583 and 65584 and additional affordable housing requirements, and is necessary to achieve the goals set forth in the City's Housing Element. The City Council finds that this Ordinance permits no greater density than is necessary to accommodate the required housing. The City Council finds that the criteria identified in the Essential Housing Program as establishing eligible Essential Housing Project sites have been narrowly tailored to the housing needs of the City, and alternative sites for Essential Housing Projects are not available to satisfy the requirements of state housing law."

VII. CONCLUSION

The City may legally conclude that the Fanita Ranch Project complies with state housing laws, including the DBL, the HAA, and SB 330, and adheres to the City's Essential Housing Program without requiring a GPA or any other legislative action.