CITY OF SANTEE
INITIAL STUDY

1. Project Title: Tyler Street Subdivision

2. Lead Agency Name and Address:

   City of Santee
   10601 Magnolia Avenue
   Santee, CA 92071

3. Contact Person and Phone Number: Michael Jefferson – BLUE Consulting 858-391-8145

4. Project Location: Southern terminus of Tyler Street in the City of Santee, California

5. Project Sponsor's Name and Address:

   Marc Harris

   4204 Jutland Drive, Suite A2, San Diego, California 92117

6. General Plan Designation: R-1 and p/OS

7. Zoning: R1-Low Density Residential and P/OS Park/Open Space

8. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

   The project objective is to provide additional housing opportunities within the City of Santee. The project is located on vacant land on the south end of Tyler Street. The project site is a total of 27.35 acres. The project requires a Tentative Map and Development Review Permit to subdivide the property into 14 residential lots for homes. The homes will feature several sustainable features as described in the sustainability and energy measures narrative (Section Energy VI) associated with this project. Tyler Street will be extended to the south accessing the 14 lots. The Assessor's Parcel Numbers for the site are 386-290-08, 09, 10, 13, 14, 20, 22, 24 & 26. Total grading and construction time is estimated to take approximately 250 working days.

   The project is located to the East of Mission Trails Regional Park. The project is generally bounded on the west by Mesa Road, on the north by Mesa Heights Road, on the south by Grossmont College and Grossmont Middle College High School, and on the east by Holden Road and Clifford Heights Road.

   Of the 27.35 acres onsite, 8.41 are proposed to be impacted; preserving 19.45 acres, approximately 71% of the onsite high-quality habitat. The average residential lot size will be over 20,000 square feet, with residential lots ranging from 15,000 square feet to 27,197 square feet. The remaining area of the project site is reserved for a public road (Tyler Street, Lot A; totaling 0.93 acres) and two open space easements (Lots B and C; totaling 19.45 acres). Lot A will be maintained by an HOA. The fuel modification zones will be maintained by the individual homeowners since the slopes are manufactured cut and fill slopes and are not natural slopes. Lot B and Lot C are the Open Space Lots.

   The property is currently vacant and contains an ephemeral channel which will be preserved within the created Open Space (Lot C), that allows for the ongoing maintenance required in the fuel modification zone 2 (removal of dead material). Onsite, existing Open Space (OS) Lot, per doc. 1994-0535919, is to be impacted by fuel modification zone 1 and 2 impacts. No portion of the existing OS is to be rezoned.

9. Surrounding Land Uses and Setting: (Briefly describe the project's surroundings.)

To the north and west is existing R2 medium density residential tract housing. To the east and south is undeveloped low density residentially zoned land, To the west and south/west is existing Open Space. The existing onsite Open Space easement was created by Padre Municipal Water District in 1992 for the protection of Diegan sage scrub. This existing OS totals approximately 0.91 acres and supports non-native grasslands and disturbed area (dirt roads).

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

California Department of Fish and Game (CDFW) – Streambed Alteration Agreement (SAA - 1600 series) notification for completing the required impact neutral FMZ 2 maintenance activities within the preserved (OS) onsite willow scrub.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significant impacts to tribal resources, procedures regarding confidentiality, etc.?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

No California Native American tribes traditionally or culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture / Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

October 21, 2022
Date

Doug Thomsen
Printed Name

Senior Planner
Title

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analyses Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and

   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues:

I. <u>AESTHETICS.</u> Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on scenic vista?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Community Enhancement Element.

This project is located within City of Santee Multi-Habitat Planning Area (MHPA), the preserve system of the City's Multiple Species Conservation Program (MSCP). The site located east of Mission Trails Regional Park, which is a designated open space area, and is bound to the north by Mesa Height Road. Housing developments border the northern (Mesa Height Road development) and eastern (Clifford Height Road development), Property Lines (PL) and undeveloped land occurs to the south and west.

A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Public views in the City consist of viewsheds, which are generally unobstructed panoramic views of a highly valued landscape from a public vantage point, and view corridors, which are views along public rights-of-way framed by permitted development. A substantial adverse effect to a scenic vista would occur if the project would degrade a view of a designated scenic viewshed or a highly valued landscape.

The Santee General Plan Community Enhancement Element describes numerous topographic features in the City and the surrounding vicinity as providing distinctive views and vistas from developed portions of the City. Although the Santee General Plan does not designate specific scenic vistas in the City, the major ridgeline and hillside systems provided by undeveloped areas of the northern portion of the City, including the project site, present a large portion

of the views and vistas in the City. Jurisdictions outside of the City surrounding the project site, such as the County's Lakeside Community Plan, do not designate scenic vistas in the viewshed of the project site.

The project site is located in a low-lying area south of the San Diego River and north of Mission Trails Regional Park. Scenic resources in the project area include the view of the onsite slope (to be avoided and preserved) rising up to the ridgeline separating the Property form the Mission Trail Regional Park (not visible, on the other side of the ridge line).

The Project was designed to be set down as low on the site as possible while protecting the onsite drainage (elevation of 425 feet) and the ridge (elevation of 675 feet) view line. With the proposed house pads at elevations ranging from 433 to 504.5 feet, the project would not be seen from areas such as Mission Trails Regional Park or Prospect Avenue (closest main street, to the north) due to the intervening distances between these areas and the project site and the existing developed nature of the surrounding landscape.

Therefore, the project will have a less than significant impact on the distinctive views and vistas from within the developed portions of the City.

No other scenic resources have been identified in the project area. As a result, the project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings with a scenic highway?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:
Source(s): City of Santee General Plan, Community Enhancement and Circulation Elements.
The project site is not located within view of a state scenic highway. The closest scenic highway is State Route (SR) 125, approximately 2,200 linear feet (0.42 miles) east of the Property. Next closest is SR 52, approximately 2,770 linear feet or 0.5 miles north of the property. In addition, no rock outcroppings or historic buildings are located onsite and all trees onsite are predominantly located within the wetlands. All wetlands have been avoided and will be placed within a Conservation Easement. As a result, no impact would occur to scenic resources within a state scenic highway.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:
Source(s): City of Santee General Plan
The project is not within a Non-Urbanized area. The property is located within in an urbanized area and the project does not conflict with applicable zoning and other regulations governing scenic quality. Analysis of the proposed project's impacts on visual quality and character considers the changes in available public views of the project site. Public views were analyzed depicting various existing and proposed condition views surrounding the project site. The proposed project would alter the existing aesthetic characteristics of the project site from a limited number of vantage points; all from immediately adjacent rear yards of the surrounding residences. As a result, unless you are at the proposed entry to the development, the project would not be visible from the existing public right of way areas. Policies of the General Plan that project scenic resources are focused on protecting views of the surrounding open space system. As noted above under response I.e.), the project is an infill development that would not adversely impact views from scenic vistas. As designed, the project is down low and encircled by existing development and ridgelines. Changes in the project site's aesthetic appearance would be visible from public vantage points located adjacent to the project site from the surrounding single family residential developments, to the north, and east. Public views form the south and west are blocked by the onsite ridgeline. In addition, the property is surrounded by recreational areas such as Mission Trails to the west, San Diego River to the north, major roadways (Prospect Street to the north) and highways, SR52 to the north and SR125 to the east.

The area within the project site (proposed developed area) is currently vacant and disturbed from prior grading and/or agricultural use(s). As there are no existing structures or development, the site lacks any distinguishable character. The existing visual character of the area is dominated by the steep slopes leading up to the ridgeline, the ridgeline and the wetlands; all proposed to be avoided and preserved. Overall, the project would enhance the visual character and quality of the site and its surroundings because the project removes the accumulated trash that is all located within the development footprint and the residential structures incorporate architectural elements and landscape features that would enhance the visual quality of the area. Thus, the project would not substantially degrade the existing visual character or quality of the site and its surroundings. Impacts would be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Santee Municipal Code

Although there are currently no sources of existing light or glare originating from the project site, the surrounding residential development surrounding the proposed development area are existing sources of light and glare. The project would incrementally increase the amount of light and glare in the area from outdoor lighting. Light spillover, trespass, and potential glare from project lighting are regulated by Section 13.08.070 of the Santee Municipal Code. No Project specific photometric study was required or completed. The code requires that all lights and illuminated signs shall be shielded or directed so as to not cause glare on adjacent properties or to motorists. The minimum performance criteria states that light fixtures for walks, parking areas, driveways, and other facilities shall be provided in sufficient number and at proper locations to provide illumination and clear visibility to all outdoor areas, with minimal shadows or light leaving the property. The lighting shall be stationary, directed away from adjacent properties and shielded so that no light or glare is transmitted or reflected in such concentrated quantities or intensities as to be detrimental to the surrounding area. To eliminate glare to the greatest extent possible, the exterior of the houses have been designed with large roof overhangs and constructed of stucco with cultured stone veneer; materials that would limit any potential glare. As a result, consistency with Section 13.08.070 would ensure that the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information complied by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resource Board – Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee General Plan, Land Use Element; and City of Santee, Zoning Ordinance, Department of Conservation, Farmland Mapping and Monitoring Program.

The project site is currently vacant with disturbance from prior clearing and/or grading and does not support any agricultural operations. As shown on the 2012 San Diego County Important Farmland maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, the project site is mapped as Farmland of Local Importance. But none of the site is mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. According to the Department of Conservation, California Farmland Conversion Report 2008 – 2010, the definition of Farmland of Local Importance for San Diego County is as follows:

"Land that meets all the characteristics of Prime and Statewide, with the exception of irrigation."

and,

"Farmlands not covered by the above categories [Prime, Unique, and Statewide Importance] but are of significant economic importance to the county. They have a history of good production for locally adapted crops. The soils are grouped in types that are suited for truck crops (such as tomatoes, strawberries, cucumbers, potatoes, celery, squash, romaine lettuce, and cauliflower) and soils suited for orchard crops (avocados and citrus)."

The project site does not contain any agricultural operations and has no recent history of agricultural production. As a result, the project does not meet the definition of Farmland of Local Importance, which requires that the land have a history of good production for locally adapted crops. Additionally, the land is not zoned for agricultural use. Therefore, the project would not result in the conversion of agricultural land or any Prime Farmland, Unique Farmland, or Farmland of Statewide importance to a non-agricultural use. No impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; City of Santee, Zoning Ordinance.

The project site is zoned for Low Density Residential (R-1) and Open Space use. The project site is not within an Agricultural Preserve and is not subject to a Williamson Act Contract. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; City of Santee, Zoning Ordinance.

The project site is vacant and supports: Developed area, disturbed area, Diegan coastal sage scrub, southern mixed chaparral. wetlands, grasslands and non-native grassland. The site does not contain any forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). No impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; City of Santee, Zoning Ordinance.

The project site is vacant and does not contain any forest or timberland as defined by Public Resource Code section 4526 or Government Code section 51104(g). No impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; and City of Santee, Zoning Ordinance.

Surrounding land uses are developed with residential or commercial uses. There are no agricultural uses or forest lands on-site or in the vicinity of the project site. Therefore, the project would not result in changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to a non-forest use. No impact would occur.

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; Greenhouse Gas Assessment Tyler Street Project (OB-1, August 2020)

Following the California Clean Air Act, California was divided geographically into 15 air basins for managing the state air resources on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, have similar ambient air quality. The project site is located within the San Diego Air Basin (SDAB). Stationary sources of air emissions within each air basin are regulated by regional air quality districts, of which the project is located within the jurisdiction of the SDAPCD.

Air districts are tasked with regulating emissions such that air quality in the basin does not exceed national or California ambient air quality standards (NAAQS and CAAQS); where NAAQS and CAAQS represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. NAAQS and CAAQS have been established for six common pollutants of concern known as criteria pollutants, which include ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), lead (Pb), and respirable particulate matter (particulate matter less than 10 microns [PM_{10}] and less than 2.5 microns [$PM_{2.5}$]).

The SDAB is currently classified as a federal and state non-attainment area for ozone, and as a state non-attainment area for PM_{10}, and $PM_{2.5}$. The SDAPCD prepared an air quality plan, the 2016 Regional Air Quality Strategy (RAQS), to identify feasible emission control measures intended to progress toward attaining NAAQS and CAAQS for ozone. Reducing ozone concentrations is achieved by reducing the precursors to the photochemical formation of ozone (volatile organic compounds and oxides of nitrogen [NO_X]).

The growth forecasting for the RAQS is based in part on the land uses established by local general plans. Thus, if a project is consistent with land use designated in the local general plan, it can normally be considered consistent with the RAQS. Projects that propose a different land use than is identified in the local general plan may also be considered consistent with the RAQS if the proposed land use is less intensive than the current land use designation. For projects that propose a land use that is more intensive than the current zoning designation, detailed analysis is required to assess conformance with the RAQS.

The project site is currently designated and zoned as Low Density Residential (R-1) and Open Space use. The project would be consistent with the existing land use and zoning designations for the project site, and therefore would be consistent with the growth assumptions of the General Plan. Additionally, as discussed in Section III.b below, project

emissions would not exceed the project-level significance thresholds. Therefore, the project would not result in an increase in emissions that are not already accounted for in the RAQS, and impacts would be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; Greenhouse Gas Assessment Tyler Street Project (OB-1, August 2020)

Construction Phase

Construction of the Project would result in emissions of the criteria air pollutants ROG, NOX, CO, PM10, and PM2.5. Emissions from construction would result from fuel combustion and exhaust from construction equipment and vehicle traffic and fugitive dust from earth moving operations and roadways. Criteria pollutant emissions from off-road construction equipment use were estimated using the latest CalEEMod computer model.

Whereas, construction activity is planned in two phases, with the first phase consisting of the site preparation and grading necessary to produce the site building pads. The second phase will consist of building construction, paving, and architectural coating. CalEEMod defaults were used.

Table 7 presents ppd emissions for construction activities related to the Project. As Table 7 shows, that the thresholds are not exceeded in either construction year. CalEEMod output is in Appendix A.

Table 7 – Construction Criteria Emissions

Year - Construction Phase	**Criteria Emissions (ppd)**				
	ROG	**NOx**	**CO**	**PM10**	**PM2.5**
Construction in 2021	46.780	42.46	36.69	20.41	11.99
Construction in 2022	44.02	1.53	1.84	0.10	0.10
Tyler Street Maximum Daily	***46.78***	***42.5***	***36.7***	***20.4***	***12.0***
Significance Threshold	*137*	*250*	*550*	*100*	*55*
Exceed Thresholds?	*No*	*No*	*No*	*No*	*No*

Operational Phase

CalEEMod was also used to estimate the predicted operational emissions of the Project. Operational emissions include emissions from mobile sources associated with the facility, natural gas usage, architectural coatings, consumer products, and landscaping equipment.

Emissions for each category are presented in Table 8. The thresholds of significance are also included in this table as well as information regarding whether annual operational emissions would exceed those thresholds. As shown in Table 8, operational emissions would be well below SDAPCD thresholds. Detailed emissions calculations are included in Appendix A of the Greenhouse Gas Assessment.

Table 8 – Estimated Operational Criteria

Emissions Emission Category	**Criteria Emissions (ppd)**				
	ROG	**NOx**	**CO**	PM10	**PM2.5**
Mobile	0.20	0.80	2.11	0.61	0.17
Energy	0.01	0.11	0.05	0.01	0.01
Area	0.82	0.25	1.26	0.03	0.03
Project Total	***1.0***	***1.2***	***3.4***	***0.7***	***0.2***
Significance Threshold	*137*	*250*	*550*	*100*	*55*
Exceed Thresholds?	*No*	*No*	*No*	*No*	*No*

Cumulative Impacts

In lieu of specific City guidelines, the County's Air Quality Guidelines (37) was used. The Guidelines state that even if direct air quality impacts from a proposed project are less than significant, the project may still have a cumulatively considerable impact on air quality if the emissions are in combination with other reasonably foreseeable future projects within proximity of the proposed action. Projects that would individually cause a significant direct air quality impact with respect to construction or operational PM10, PM2.5, NOX, or VOC emissions would also be considered to have a cumulatively considerable net increase in emissions.

It has been shown that during construction and operational activities, no significance threshold was expected to be exceeded; therefore, the emissions of particulate matter and NOX would not result in a significant cumulative health impact.

Additionally, the guidelines list special consideration of operational cumulatively considerable net increases due to the mobile nature of the emissions. The following guidelines for determining significance must be used for determining the cumulatively considerable net increases during the operational phase:

- A project that does not conform to the RAQS and/or has a significant direct impact on air quality with regard to operational emissions of PM10, PM2.5, NOX, and/or VOCs would also have a significant cumulatively considerable net increase.

- Projects that cause road intersections to operate at or below a level of service E (analysis only required when the addition of peak-hour trips from the Proposed Project and the surrounding projects exceeds 2,000) and create a CO hotspot create a cumulatively considerable net increase of CO.

The Project is considered consistent with the current RAQS and area- and mobile-source emissions do not cause a significant impact during Project operations. Additionally, the Project does not create a CO hotspot.

Expose sensitive receptors to substantial pollutant concentrations?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; Greenhouse Gas Assessment Tyler Street Project (OB-1, August 2020)

Sensitive receptors are defined as land uses where sensitive population groups are likely to be located (e.g., children, the elderly, the acutely ill, and the chronically ill). These land uses include residences, schools, childcare centers, retirement homes, convalescent homes, medical care facilities, and recreational facilities. Sensitive receptors that may be adversely affected by the Project include the surrounding residential land uses.

Since the Project site is adjacent to sensitive receptors, special attention is considered warranted to mitigate the potential for impact to these residences. Even though the construction management team is required to meet the SDAPCD Rule 55, Fugitive Dust Control requirements, which includes prohibition of dust leaving property line for

more than 3 aggregated minutes per hour, special consideration should be observed during the grading activity nearest these residences. Therefore, the following mitigation is required:

MM-AQ-1 – As a supplement to San Diego Air Pollution Control District Rule 55, Fugitive Dust Control, the applicant shall require the contractor to apply water at least twice daily at all active earth disturbance areas sufficient to confine dust plumes to the immediate area.

Diesel Particulate Matter

During construction activities, diesel equipment will be operating and DPM is known to the State as a TAC. However, the risks associated with exposure to substances with carcinogenic effects are typically evaluated based on a lifetime of chronic exposure, which is defined as 24 hours per day, 7 days per week, 365 days per year, for 70 years. The short-term nature of project construction would support that exposure to diesel exhaust emissions during construction would not be significant.

c) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

The CEQA Guidelines indicate that a significant impact would occur if a project would create objectionable odors affecting a substantial number of people. While offensive odors rarely cause any physical harm, they can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and the SDAPCD. Because offensive odors rarely cause any physical harm and no requirements for their control are included in State or federal air quality regulations, the SDAPCD has no rules or standards related to odor emissions, other than its nuisance rule.

The proposed Project does not include elements that would generate objectionable odors, nor would they attract persons to an area where there would be a potential for exposure to objectionable odors. The impact would be less than significant.

IV. BIOLOGICAL RESOURCES. Would the project:

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

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; Tyler Street Biological Assessment; BLUE Consulting Group; July, 2022)

The Property, located over approximately 27.35 acres is located at the terminus of Tyler St. in the City of Santee (City), County of San Diego. The site is located just south of Mesa Heights Road, approximately 2000 feet south of the 52 Freeway and approximately 2000 feet west of the 125 Freeway, on the La Mesa USGS 7.5-minute quadrangle.

The Property is within the City of Santee draft Multiple Species Conservation Plan (MSCP) Subarea Plan and Multiple Habitat Preservation Area (MHPA) and Mission Trails Sub-Unit. A portion of the Property supports designated Critical Habitat for the coastal California gnatcatcher as well as an existing habitat easement to the Padre Dam Water District over approximately 0.91 acres in the south eastern corner of the property. This easement is titled 'Diegan sage scrub easement' but supports non-native grasslands and disturbed habitat (dirt access roads).

A total of seven vegetation communities are mapped on-site: Diegan coastal sage scrub, mixed chaparral, disturbed southern willow scrub, jurisdictional ephemeral drainage, disturbed habitat, native and non-native grasslands.

The proposed Project would potentially significantly impact three sensitive habitat types across 6.78 acres (grading impacts and Zone 1 and upland Zone 2 fuel modification zone maintenance impacts). These impacts are considered significant and require mitigation. The compensatory mitigation is proposed to occur offsite with the purchase of habitat mitigation credits. There is a total of 19.45 acres of high-quality habitat preserved onsite because 0.86 acres of avoided habitat is within the existing 'Padre Dam WD sage scrub easement'.

Fuel Modification Zone (FMZ) 1 maintenance is required onsite within one sensitive habitat types; non-native grasslands. Impacts within the Fuel Modification Zone 1 area are considered significant impacts and compensatory mitigation is required. Fuel Modification Zone 2 maintenance is required onsite within three (3) sensitive habitat types; native grasslands, non-native grasslands and willow scrub. Impacts within the FMZ 2 area in the willow scrub area requires the removal of only dead material. As a result, FMZ 2 impacts to the Willow Scrub are considered impact neutral and compensatory mitigation is not required.

Potentially significant biological impacts shall be reduced to below a level of significance with implementation of the recommended mitigation measures. For the potentially significant impacts to the 6.78 acres of sensitive habitat(s), including double mitigation for the impacts to the non-native grasslands within the existing Padre Dam Municipal Water District sage scrub easement, a minimum of 7.7 acres of sensitive habitat mitigation is required.

Of the 27.35 acres onsite a total of approximately 30% of the Property, totaling 8.41 acres, are proposed to be impacted by the Project. A total of 19.45 acres (70%) of habitat are avoided and to be preserved by the Project. No potentially significant biological impacts to the observed sensitive plant and wildlife species, coastal sage scrub and the observed CDFW jurisdictional ephemeral channel and wetlands (avoided) are proposed. All avoided habitat is to be placed within the created Open Space easements (OS: Lot 'B' and Lot 'C') and within the existing water district OS sage scrub easement. Potentially significant direct impacts which require compensatory mitigation are considered those impacts to sensitive species/habitat(s) within the grading footprint and upland Fuel Modification Zone.

The unavoidable FMZ maintenance impacts to the native grasslands and non-native grasslands within the existing approximately 0.91-acre Padre Dam 'sage scrub easement' are considered significant and both the loss of the habitat and 'sage scrub easement' area acreage is proposed to be mitigated for, see mitigation section.

Sensitive Plants

The proposed Project will impact no sensitive plant species. As designed, proposed Project impacts are located within the portion of the site that had been historically impacted/disturbed and the furthest away from the steep-slopes leading up to the ridgeline and the onsite sensitive upland habitats. As a result, all areas supporting sensitive species are proposed to be avoided and preserved. No additional compensatory mitigation is required.

Sensitive Wildlife

The proposed Project will impact no sensitive wildlife species. As designed, proposed Project impacts are located within the portion of the site that had been historically impacted/disturbed and the furthest away from the steep-slopes leading up to the ridgeline and the sensitive upland habitats that support the sensitive species. As a result, all areas supporting sensitive species are proposed to be avoided and preserved. No compensatory mitigation is required.

As a result of not impacting sensitive wildlife species, the project will have not a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Less than Significant with Mitigation Incorporated.

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

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; Tyler Street Biological Assessment; BLUE Consulting Group; July, 2022)

Biological Impacts – Temporary And Permanent

Of the 27.35 acres onsite a total of approximately 30% of the Property, totaling 8.41 acres, are proposed to be impacted by the Project. Of these impacts, 6.78 acres are considered sensitive habitats and compensatory mitigation is required (Table, below).

Proposed Project - Significant Impacts

Plant Community	Tier	Acres	Grading/ FMZ 1 Impacts	Sage Easement Impacts	FMZ 2 Impacts	Impacts Total
Diegan Coastal Sage Scrub	II	6.36	0.0	0.0	0.0	0.0
Native Grasslands	I	1.24	0.59	0.01	0.01	0.61**
Southern Mixed Chaparral	III	8.84	0.14	0.0	0.0	0.14**
CDFW Willow Scrub (dist.)	I	0.24	0.0	0.0	0.24***	0.24***
CDFW Ephemeral Unvegetated Channel*	I	309 linear feet/0.02	0.0	0.0	0.0	0.0
Non-Native Grasslands	III	8.7	5.27	0.28	0.19	5.74**
Disturbed habitat	IV	1.97	1.63	0.02	0.03	1.68
TOTAL		27.35	7.63	0.31	0.47	8.41

* Area not included in habitat total, calculated as underlying habitat

** Significant Impact

*** FMZ 2 – only dead material is to be removed. Not considered a CDFW significant impact.

Proposed Project – Avoided/Preserved Habitat

Plant Community	Tier	Acres	Impacts	Preserve	% Preserved
Diegan Coastal Sage Scrub	II	6.36	0.0	6.36	100%
Native Grasslands	I	1.24	0.61*	0.63	51%
Southern Mixed Chaparral	III	8.84	0.14*	8.70	98%
CDFW Willow Scrub (dist.)	I	0.24	0.24**	0.24	100%
CDFW Ephemeral Unvegetated Channel*	I	309 linear feet/0.02	0.0	309 linear feet/0.02	100%
Non-Native Grasslands	III	8.7	5.74*	2.96	34%
Disturbed habitat	IV	1.97	1.68	0.29	14%
TOTAL		27.35	8.41	19.45	

* Significant Impact

** FMZ 2 impacts not considered significant – Willow Habitat in FMZ 2 to be included in Preserve

As outlined in the 2018 draft Subarea Area Plan (SAP) mitigation is required to reduce these potentially significant impacts to a level below significance.

Fuel Modification Zone 2 maintenance is required within the wetlands and grasslands. Lake and Streambed Alteration Program by the CA Department of Fish and Wildlife would allow for Zone 2 maintenance which only allows for the removal of the dead material within this Drainage areas. Because this type of FMZ 2 maintenance impacts do not disturb the soils or removed healthy material, it is considered less than significant by CEQA, wildlife agencies, FMZ 2 maintenance is considered impact neutral. No significant impacts to the wetlands are proposed. No compensatory mitigation is required.

All avoided habitat, including the habitat with wetland Willow Scrub FMZ 2 maintenance requirements, is to be preserved in perpetuity within a created Open Space easement.

Regulations within the draft subarea plan require that impacts to chaparral, native and non-native grasslands are mitigated according to the Uniform Mitigation Standards.

For the potentially significant impacts to the 6.78 acres of sensitive habitat(s), a minimum of 7.7 acres of sensitive habitat mitigation is required.

Biological Impacts – Potential Indirect Impacts

Biological resources located adjacent to the proposed development (north, south and east of the property) could be indirectly impacted by both construction and post-construction activities associated with the proposed Project.

Potential indirect impacts may include an increase in urban pollutants entering sensitive water bodies and edge effects. These edge effects include a potential increase in noise, human intrusion, and introduction of domestic animals, night lighting, habitat disturbance and pollutants (fugitive dust).

As described below, potential indirect impacts resulting from the proposed Project are not proposed/expected to occur. Preventative measures will be required and implemented to ensure that indirect impacts do not occur. The Property is currently surrounded by residential development on all side and is actively utilized by the community at large through the numerous trails running through the Property.

The approval and development of the 14 residential lots will require the implementation of all identified preventative measures, during construction and under final residential use, that will separate the areas to be impacted from the preserved areas. As described below, potential indirect impacts into the preserved area (open space) which supports the sensitive habitats and wildlife will be avoided.

1. Water Quality

The proposed project site is located proximate to an ephemeral drainage and will continue to partially drain into the existing ephemeral drainage where it enters the property from a concrete box. Water quality has the potential to be adversely affected by potential surface runoff and sedimentation during the construction and operation of the project; however, Best Management Practices (BMPs) shall be implemented that shall reduce potential impacts to below significance. Therefore, the project is not expected to decrease water quality or affect vegetation, aquatic animals, or terrestrial wildlife that depends upon the water resources.

2. Habitat Disturbance

Development of residential, commercial, office, and/or restaurant uses typically lead to an increase in human presence on and around project sites. However, this is a project which is predominantly within the pre-existing developed envelope. Therefore, while there may be an increase in total human activity in the area, the area has already absorbed the biological loss to function and value and it is unlikely (if possible) that the project could lead to further fragmentation of habitat and the degradation of sensitive habitat if people or pets wandered outside the developed area. Additionally, illegal dumping of green waste, trash, and other refuse, which currently negatively impacts the adjacent habitat, would be eliminated.

3. Edge Effects

Edge effects occur when blocks of habitat are fragmented by development. Potential edge effects include: potential increase in noise, human intrusion, introduction of domestic animals, night lighting and dumping.

These edges make it easier for non-native plant species to invade native habitats. Edge effects can also make it easier for both native and non-native predators to access prey that may have otherwise have been protected within large, contiguous blocks of habitat. In addition, the disruption of predator-prey, parasite-host, and plant-pollinator relations can occur.

The proposed project shall not lead to significant edge effects. The project's proposed landscape plan does not include any invasive plant species. Steep slopes that rim development areas are within the FMZ 1 and 2 and shall be landscaped in Fire Marshal approved native and naturalized plant material and serve as a buffer to native habitat surrounding the project site. In addition, as previously stated, the approval and development of the 14 residential lots will require the implementation of all identified preventative measures and funded to implement access control measures in perpetuity. Therefore, the Project implementation will improve on the existing habitats exposure to the current edge effects, primarily the impact of human use (walking trails with pets and dumping).

4. Night-time Lighting

Development of the project site shall introduce night-time lighting in the form of street and parking lights, car headlights, and residential lights. Night-time lighting on native habitats can provide nocturnal predators with an unnatural advantage over their prey. This could cause an increased loss in native wildlife that could be a significant impact unless mitigated. Nighttime lighting shall be consistent with the City's lighting requirements and shall not cause significant impacts on wildlife habitat. As a result, no photometric study is required.

5. Fugitive Dust

Fugitive dust produced by construction could disperse onto vegetation. Effects on vegetation due to airborne dust could occur adjacent to construction. A continual cover of dust may reduce the overall vigor of individual plants by reducing their photosynthetic capabilities and increasing their susceptibility to pests or disease. This, in turn, could affect animals' dependent on these plants (e.g., seed eating rodents or insects or browsing herbivores).

Fugitive dust impacts shall not be considered significant because the project shall be required to implement mandatory dust control requirements, per the City approved grading plan(s) and grading ordinances, that ensure dust control is implemented and significant impacts shall not occur.

Biologically Significant Direct Impacts and Mitigation:
For the proposed significant impacts to 6.78 acres of sensitive habitat, a total of 7.7 acres of habitat mitigation is required; see table, below. Mitigation will be completed offsite with the purchase of compensatory habitat mitigation credits (7.7) within an approved habitat mitigation preserve.

A total of 19.45 acres of onsite high-quality sensitive habitat (and the sensitive species that are supported by it) are proposed to be avoided and preserved. Avoided area/habitat will be preserved within the proposed two new OS lots, Lot 'B' and Lot 'C'.

Proposed Project Impacts and Habitat Mitigation Requirements

Plant Community	Tier	Onsite Acres	Total Impacts	Mitigation Ratio	Mitigation Acreage
Diegan Coastal Sage Scrub	II	6.36	0.0	N/A	N/A
Native Grasslands	I	1.24	0.61**	2:1	1.22
Southern Mixed Chaparral	III	8.84	0.14**	1:1	0.14
CDFW Willow Scrub (dist.)	I	0.24	0.24	N/A	N/A
CDFW Ephemeral Unvegetated Channel*	I	309 linear feet/0.02	0.0	N/A	N/A
Non-Native Grasslands	III	8.7	5.74**	1:1	5.74
Sage Easement impacts; Native Grasslands	I		0.01**	4:1 (double)	0.04
Sage Easement impacts; Non-Native Grasslands	III		0.28**	2:1 (double)	0.56
Disturbed habitat	IV	1.97	1.68	N/A	N/A
TOTAL		27.35	8.41		7.7

* Area not included in habitat total, calculated as underlying habitat
**Considered a Significant Impact (6.78 acres)

Indirect Impacts Avoidance – Mitigation Measures

- Prior to initiating any construction related activities, including clearing, grubbing, grading and construction, a qualified, City approved biological monitor shall be retained by the project proponent and shall be onsite during clearing, grubbing, and/or grading activities. The biological monitor shall attend all preconstruction meetings and be present during the removal of any vegetation to ensure that the approved limits of disturbance are not exceeded and provide periodic monitoring of the impact area including, but not limited to, trenches, stockpiles, storage areas and protective fencing. In addition, the biological monitor shall be on site during construction to ensure that vehicles stay within the limits of the permitted Project footprint. The biological monitor shall be authorized to halt all associated project activities that may be in violation of the City's draft MSCP Subarea Plan and/or permits issued by any other agencies having jurisdictional authority over the project.

- Prior to initiating any construction related activities, including clearing, grubbing, grading and construction, all workers shall be educated by a City approved biologist to recognize and avoid those areas which have been marked as sensitive biological resources.

- Prior to initiating any construction related activities, including clearing, grubbing, grading and construction, biological fencing (i.e., ESA type fencing) shall be installed. Prominently colored, well -installed fencing and signage shall be in place wherever the limits of grading are adjacent to sensitive vegetation communities or other biological resources, as identified by the qualified monitoring biologist. Fencing shall remain in place during all construction activities. All temporary fencing shall be shown on grading plans for areas adjacent to and/or within the Preserve.

- Immediately following construction activities, the biological monitor shall prepare and submit to the satisfaction of the City, a monitoring report documenting the project's compliance with all minimization/avoidance measures.

As a result of the Project design, implementation of preventative indirect impacts prevention mitigation measures, avoidance of all riparian habitat, proposed compensatory mitigation measures for the unavoidable loss of sensitive habitats, including: native grasslands, southern mixed chaparral and non-native grasslands, no substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service is proposed. Less than Significant with Mitigation Incorporated.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; Tyler Street Biological Assessment; BLUE Consulting Group; July 2022)

Refer to response for Section IV. b) above. The Project does not significantly impact any riparian habitat. CDFW jurisdictional wetlands and waters were observed onsite. Due to the ephemeral nature of the storm flows through the onsite channel, the USACE has no jurisdiction. The proposed development proposes FMZ 2 within the willow scrub area. This requires the removal of dead material – not living material. As a result, this not does not significantly impact the observed CDFW jurisdictional ephemeral drainage channel (unvegetated) or wetlands (willow scrub). All disturbed CDFW jurisdictional Willow Scrub habitat will be avoided and preserved. No substantial diversion or obstruction to the natural flow, or substantial change to the bed, channel, or bank, or if there is any use of material from the bed, channel, or bank, or if there is deposition of debris, waste, or other material where it may pass into a river, stream, or lake, is proposed. No substantial adverse effect on existing fish and wildlife resources is proposed. All 0.24 acres of wetlands are to be preserved and maintained (FMZ 2) onsite within the OS. No impact. No wetland mitigation is required.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Open Space Conservation Element, City of Santee Draft Multiple Species Conservation Plan (MSCP) Subarea Plan; Tyler Street Biological Assessment; BLUE Consulting Group; May 2022).

The property does not support an identified formal established native resident or migratory wildlife corridors. The proposed Project will not impede the use of native wildlife nursery sites. The project footprint, generally located at the toe of the natural slope, is vacant and has been previously graded/altered. This portion of the site is highly disturbed with accumulated trash in the wetlands and urban uses on three sides. As a result, this area does not function as a wildlife movement corridor. The property is located adjacent to open space (adjacent to the western property line), and between two additional large blocks of existing fully conserved lands. As such the project western portion (to be preserved) supports stepping stone linkages between nearby open space lands. Because the proposed development is clustered in the low-lying area along the eastern property line (adjacent to the existing offsite developed area), potential

impacts to the ridgeline, the habitat and the wildlife corridor is avoided and preserved (supporting the grasslands, CSS and chaparral).

Due to the distance away from the steep slopes and ridgeline (greater than 450 linear feet and 150 feet of vertical elevation) potentially significant direct or indirect impact to the adjacent wildlife movement corridor is not expected to occur. No mitigation is required. Less than significant impact.

Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, Draft MSCP Subarea Plan, General Plan, Land Use Element; Tyler Street Biological Assessment; BLUE Consulting Group; July 2022)

The City of Santee has a Conservation Element in the General Plan. The purpose of the Conservation Element is to identify the community's natural and man-made resources and to encourage their wise management in order to assure their continued availability for use, appreciation and enjoyment. The Conservation Element includes policies and implementation measures to encourage the conservation and proper management of natural resources and open space areas in the City. No standalone protection policy (e.g. for ornamental trees) is applicable in the City. The project would not conflict with or prevent implementation of the Plan because the project site is not located within the Draft Subarea Preserve and is not proposed for conservation.

Thus, the project would not conflict with any local policies or ordinances protecting biological resources. Project impacts would be less than significant.

e) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; Tyler Street Biological Assessment; BLUE Consulting Group; July 2022)

The proposed project would not conflict with the City of Santee Draft MSCP Subarea Plan. As discussed above in Section IVb), the project applies the Standard Uniform Ratios from the draft Subarea Plan to mitigate for habitat impacts. The project preserves the majority of the high-quality habitat onsite, including habitat occupied by the San Diego cactus wren and Coastal California gnatcatcher. Both of these species are proposed covered species in the Draft MSCP Subarea Plan. The project's open space abuts open space to the south, and is between two fully conserved lands. By preserving the easternmost habitat, it allows for Coastal California gnatcatcher and other wildlife stepping stone linkages between the nearby open space lands. Because the proposed project clusters the proposed residential development adjacent to existing development and preserves the onsite open space adjacent to other open space, the project is consistent with the goals of the Subarea Plan. Project impacts would be less than significant.

V. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; Cultural Resources Study for the Tyler Street Residential Project (Brian F. Smith and Associates, Inc; May 3, 2018).

Two previously recorded cultural resources, SDI-11,542H and SDI-11,543, were relocated within the Tyler Street Residential Project boundary during the current study. Site SDI-11,542H is characterized as the remnants of a mid-twentieth century rural residential property with an associated trash scatter situated approximately 125 meters south/southwest of the southern terminus of Tyler Street. Site SDI-11,543 represents a low density prehistoric lithic scatter with no subsurface components situated along an east-to-west-trending ridge approximately 250 meters south/southwest of the southern terminus of Tyler Street. Both sites were originally recorded in 1989 by Affinis (Knight et al. 1989). The current study verified the locations of the sites and conducted a significance testing and evaluation program for both.

The testing of SDI-11,542H and SDI-11,543 has provided information indicating that neither of the two sites represents a location of archaeological significance as defined by CEQA or the City of Santee. Based upon the analysis of the recovered artifacts and testing program, both sites lack additional research potential or deposits and are evaluated as not CEQA-significant and not eligible for the California Register of Historical Resources. Further, because the sites are not significant under any CEQA criteria, they are also not eligible for the National Register of Historic Places. For Site SDI-11,542H, the artifact analysis and review of archival data indicates the site was likely occupied during a short period between the 1940s and 1960s. In addition, the small number of artifacts recovered from subsurface tests indicates the concentration of historic material found in the southwestern corner of the site does not extend beyond the limits of the surface expression of the site. The lack of any developed significant subsurface component also further indicates that the property was not occupied for an extended period of time. For Site SDI-11,543, the lack of subsurface artifacts and the lithic recovery of eight pieces of lithic debitage and one core from the site surface suggests that the prehistoric activity was associated with the testing of material and expedient production of flake-based tools. Quartzite lithic material is extremely common in this region, and the ease of access to this material allowed prehistoric occupants to produce tools as needed without necessarily transporting raw material to use areas. Since the site exhibits a small surface scatter of artifacts with no subsurface deposit, ecofacts, or features, the information already obtained represents a large portion of the research potential of the site and it is unlikely that significant additional and different information would be gathered from further investigations due to the lack of a subsurface deposit. The project site is vacant and does not contain any structures. No historical resources are located on the project site, and therefore, the project would not cause a substantial adverse change in the significance of a historical resource, as defined in Section 15064.5.

Impacts would be less than significant.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; Cultural Resources Study for the Tyler Street Residential Project (Brian F. Smith and Associates, Inc; May 3, 2019).

The proposed development for the Tyler Street Residential Project will include the grading of the location of SDI-11,542H. Although Site SDI-11,543 is to remain in open space, increased development in the general area may indirectly impact the site through greater pedestrian use of the already established trails and dirt roads found on the property. Nevertheless, impacts to the cultural sites will not be significant as the research potential of both resources has been exhausted based upon the recovered testing data. However, due to the location of the project site partially within the floodplain of the wetlands and in an undeveloped area, there is a potential for site grading to inadvertently uncover buried archaeological resources.

As a result, impacts would be potentially significant and mitigation would be required.

CUL-1 Archeological Monitor

Potential impacts to buried artifacts or human remains inadvertently discovered during project grading would be mitigated through the requirement for archaeological and Native American monitors to be present on-site during grading activities. The archeological monitor would ensure that if any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, all work within 50 feet of the resources shall be halted

and a qualified archaeologist shall be consulted to assess the significance of the find according to CEQA Guidelines section 15064.5. If any find is determined to be significant, representatives from the City and the archaeologist will meet to determine the appropriate avoidance measures or other appropriate mitigation. All significant cultural materials recovered shall be, as necessary and at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to historical resources or unique archaeological resources, the City will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed on other parts of the project site while mitigation for cultural resources is being carried out.

If human skeletal remains are uncovered during project construction, the archaeological monitor will direct the contractor or appropriate representative to halt work, contact the San Diego County Coroner to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5(e)(1) of the CEQA Guidelines. If the coroner determines that the remains are Native American, the project proponent will contact the Native American Heritage Commission, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). Per Public Resources Code 5097.98, the contractor shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the contractor has discussed and conferred, as prescribed in this section (California Public Resources Code Section 5097.98) with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

With implementation of archaeological monitoring during grading (CUL-1), the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Project impacts would be less than significant with mitigation.

c) Disturb any human remains, including those interred outside of formal cemeteries?

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element; Cultural Resources Study for the Tyler Street Residential Project (Brian F. Smith and Associates, Inc; May 3, 2018).

See Section V. b) above.

VI. ENERGY. Would the project:

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source: Appendix F (Energy Conservation) of the California Environmental Quality Act (CEQA) Guidelines

This section provides a summary of the energy regulatory framework, discusses the existing conditions on the project Site, discloses potential energy use during construction and operation of the proposed project, and identifies project design features and mitigation measures that may reduce energy consumption and thereby enhance energy conservation.

The proposed project would result in less than significant impacts on the wasteful, inefficient, or unnecessary use of energy due to various design features including balance grading on-site to reduce haul trips during construction, extensive on-site solar to meet the demand for electricity, design of the proposed project, installation of energy efficient appliances and lights, as well as installation of efficient water fixtures. The 14 proposed single family homes shall contain the following sustainable energy efficient measures. All interior lighting shall be high efficacy with vacancy sensor switches at bathrooms, laundry rooms, and garages. All exterior lighting shall be high efficacy with motion sensor I photo cell controls. All appliances and exhaust fans shall be Energy Star compliant. All HVAC systems shall be high efficiency with min. 14 SEER and min. 92% AFUE. All residences shall be equipped with solar ready measures. All garages shall have EV capable circuits for future electric vehicle charging. All water fixtures shall be reduced consumption fixtures complying with current California Green Standards.

Along with the above-listed sustainable measures for each home there will be sustainable features incorporated into the landscaped areas. This includes bioretention drainage control and shade trees. All landscaping shall be drought tolerant and utilize a drip irrigation system for each separate home. With the adherence to the increasingly stringent building and vehicle efficiency standards as well as implementation of the proposed project's design features that would reduce energy consumption, the proposed project would not contribute to a cumulative impact to the wasteful or inefficient use of energy. As such, the proposed project would not result in a cumulatively considerable impact on energy.

The project's operational energy usage would be minimized through compliance with the Sustainable Santee Plan, including such measures as constructing Energy Star Certified buildings. The project would also implement project features required to comply with the California Building Code Standards (i.e., or Title 24 of the California Code of Regulations [CCR]) and California Green Building Standards Code. Therefore, the project would not result in an environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Less than significant impacts would occur.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source: Appendix F (Energy Conservation) of the California Environmental Quality Act (CEQA) Guidelines

The project would be built and operated in accordance with existing, applicable regulations, which include, but are not limited to, the California Green Building Standards Code, CARB regulations, and the Sustainable Santee Action Plan (City 2020). This plan aims to reduce the City's Greenhouse Gas (GHG) emissions by 40 percent below its 2005 levels by 2030. Construction equipment and operation equipment would be maintained to allow for continuous energy-efficient operations. Additionally, the project would incorporate energy-efficient features into the proposed residences in compliance with these regulations, as described above in Item VI.a. The project would therefore not conflict with any state or local plan for energy efficiency, and no impacts would occur.

VII. GEOLOGY AND SOILS. Would the project:

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee Municipal Code; Division of Mines and Geology Special Publication 42 Preliminary Geotechnical and Update letter completed by Advanced Geotechnical Solutions, Inc.; Dated March 12, 2019.

The project site is not located within an area that has been identified as having a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. As a result, the risk of rupture of the ground surface would be unlikely. The primary seismic risk to the San Diego metropolitan area is the Rose Canyon fault zone located approximately 13 miles west of the site. Therefore, the project would not expose people or structures to significant risk of loss injury or death involving rupture of a known earthquake fault. Project impacts would be less than significant.

ii) Strong seismic ground shaking?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee Municipal Code; Preliminary Geotechnical and Update letter completed by Advanced Geotechnical Solutions, Inc.; Dated March 12, 2019. See Section VII. a) i. above.

The primary seismic risk to the San Diego metropolitan area is the Rose Canyon fault zone located approximately 13 miles west of the site. However, as the project would be required to comply with all seismic standards of California Building Code, project impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee Municipal Code; Preliminary Geotechnical and Update letter completed by Advanced Geotechnical Solutions, Inc.; Dated March 12, 2019.

The project site is located in Geotechnical Hazard Zone C1 and C3 according to the Safety Element of the General Plan. Zone C1 is identified as having a moderate to high potential for liquefaction, while zone C3 is classified as having a "low to moderate" potential for liquefaction. As the project site is not underlain by a known active or potentially active fault, the potential for ground rupture due to faulting is considered low. Liquefaction of granular soils can be caused by strong vibratory motion due to earthquakes. A liquefaction analysis of the site was completed and found the site would be susceptible to liquefaction. Total dynamic settlement potential was estimated to range from 0.5 to 1.0 inch for design earthquake ground motion and differential dynamic settlement was anticipated to be 1 inch or less within 50 horizontal feet. Based on this relative small settlement, the geotechnical report recommends inclusion of dynamic settlement in the structural analysis. No ground improvements are recommended to address the liquefaction potential

With implementation of geotechnical recommendations which are automatically required as part of the grading permit under Municipal Code 15.58.120, no substantial risk associated with liquefaction would occur. Project impacts would be less than significant.

iv) Landslides?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee Municipal Code; Preliminary Geotechnical and Update letter completed by Advanced Geotechnical Solutions, Inc.; Dated March 12, 2019.

The project site is located in Geotechnical Hazard Zone C1 and C3 according to the Safety Element of the General Plan. Zone C1 is classified as being marginally susceptible to landslides, while zone C3 is classified as "generally to marginally" susceptible to landslides. However, the project site is relatively flat, and no steep slopes are located on-site or adjacent to the property. No landslides have been observed on the project site or in the vicinity of the project site. Project impacts would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee Municipal Code, Engineering Division.

The project site is relatively flat, which limits the potential for substantial soil erosion. In addition, the project would include landscaping, which would minimize erosion potential. Throughout construction and operation, the project is required to comply with Section 15.58.140 (erosion control plans) of the City of Santee Municipal Code and landscaping requirements. Due to these factors, the project would not result in substantial soil erosion or the loss of topsoil. Project impacts would be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee Municipal Code; Preliminary Geotechnical and Update letter completed by Advanced Geotechnical Solutions, Inc.; Dated March 12, 2019.

The project site was included within the area of analysis and found that potential geotechnical issues related to compaction, liquefaction, and seismicity could be addressed through adherence to specified geotechnical recommendations. Liquefaction potential would be addressed through implementation of geotechnical report recommendations which are automatically required as part of the grading permit under Municipal Code 15.58.120 (refer to VII a) iii above). Thus, as detailed in the Preliminary Geotechnical Investigation, project impacts related to subsidence due to on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse would be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee Municipal Code; Preliminary Geotechnical and Update letter completed by Advanced Geotechnical Solutions, Inc.; Dated March 12, 2019.

The project site is located in Geotechnical Hazard Zone C1 and C3 according to the Seismic Safety Element of the General Plan. Zone C1 and C3 are classified as having a variable potential for soil expansion. During geotechnical field investigations, expansive soils were not observed within the upper soil layers at the site. With implementation of the geotechnical investigation recommendations required as part of the grading permit under Municipal Code

15.58.120, including laboratory testing of import soils for expansion potential, the project would not result in substantial risks to life or property from expansive soils. Thus, project impacts would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion: The project would be served by a public sewer. Therefore, no septic tanks or alternative wastewater disposal systems are proposed. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion: No potentially significant paleontological impact has been identified for the project site and no prehistoric resources have been previously recorded on the project site. The site does not appear to contain any indicators of significant cultural resources or geologic features. The site also does not contain any resources listed on the City's Historic Sites Survey.

While none are expected to occur, if a unique paleontological resource or site or unique geologic feature are discovered during the grading, they shall be recovered by a qualified paleontologist. Potentially significant impacts would be mitigated through the requirement for a paleontological consultant to be hired and available if a unique paleontological resource or site or unique geologic feature is uncovered. This is detailed in the following mitigation measure (PAL-1).

Implementation of PAL-1 would reduce any potentially significant impacts to paleontological resources to a level that is less than significant.

PAL-1 Paleontological Find

A. Pre-Grading Conference

1. Prior to any grading on any portion of the project site, a qualified paleontologist shall be retained to attend the pre-grading construction meeting and would be available to meet the requirements for the project as outlined below. A qualified paleontologist (or paleontological monitor) is an individual with an MS or PhD in paleontology or geology who is familiar with paleontological procedures and techniques. No grading permits shall be issued until the name and contact information for the qualified paleontologist (or paleontological monitor) has been submitted to the Planning Director.

2. A paleontologist or designee (?) shall be present during grading as determined at the pre-grading conference.

B. Fossil Recovery and Curation

1. If fossils are discovered, the paleontologist (or paleontological monitor) shall be immediately notified to recover them. No work that could impact the uncovered potential paleontological find is permitted until the area is cleared by the paleontologist. In most cases, this salvage can be completed in a short period of time. However, some fossil specimens (such as complete large mammal skeleton) may require an extended salvage period. In these instances the paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. Because of the potential for the recovery of small fossil remains, such as isolated mammal teeth, it may be necessary in certain instances, to set up a screen-washing operation on the site.
2. Fossil remains collected during the monitoring and salvage portion of the mitigation program shall be cleaned repaired, sorted, and cataloged.
3. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall either be deposited (as a donation) in a scientific institution with permanent paleontological collections such as the San Diego Natural History Museum or retained by the City and displayed to the public at an appropriate location such as a library or City Hall.

VIII. GREENHOUSE GAS EMISSIONS. Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan; Greenhouse Gas Assessment Tyler Street Project City of Santee, San Diego County.;OB-1; Dated August 2020.

The GHG emissions estimates for this analysis includes the following sources of annual direct and indirect emissions: (1) area sources (e.g., landscaping-related fuel combustion sources and natural gas fireplaces); (2) energy use associated with residential and non-residential buildings; (3) water and wastewater; (4) solid waste; (5) mobile sources (e.g., passenger vehicles and trucks); and (6) construction. The ongoing operational emissions consist of the first five categories, while the one-time emissions are associated with construction. The typical types of GHG emissions resulting from developments such as the Project are emissions of CO2, CH4, and N2O.

One-time emissions are those construction emissions that are not reoccurring over the life of the Project. The major construction phase included in this analysis is grading and on-site earth balancing. Emissions are from off-road construction equipment and on-road vehicles like worker and vendor commuting and trucks for soil and material hauling.

Some emissions would occur every year after buildout. GHGs are emitted from buildings because of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions when associated with a building. GHGs are also emitted during the generation of the electricity from fossil fuels used by the project buildings, these emissions are indirect emissions.

Indirect GHG emissions also result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. In addition, CalEEMod calculates the indirect GHG emissions associated with waste that is disposed of at a landfill using waste disposal rates by land use and overall composition.

The primary source of annual GHG emissions are associated with on-road mobile sources related to residents, workers, customers, and delivery vehicles visiting the land use types in the project. A summary of all GHG emissions from the proposed Project is presented in Table 9.

Table 9 – Proposed Project GHG Emissions

Category	**CO2e (t/year)**
Direct – Mobile (Amortized Construction)	11.1
Direct – Mobile (Operational)	110.6
Direct – Area Source	11.3
Indirect – Purchased Electricity (Power)	39.2
Indirect – Purchased Natural Gas (Power)	23.0
Indirect – Purchased Electricity (Water)	7.2
Direct – Fugitive – Solid Waste	8.2
TOTAL	211

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee Municipal Code; Greenhouse Gas Assessment Tyler Street Project City of Santee, San Diego County.;OB-1; Dated September 2020.

In 2020, the City of Santee adopted the Sustainable Santee Plan (SSP), which is a qualified greenhouse gas reduction plan under CEQA Guidelines section 15183.5. Agencies may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan.

The SSP includes a Project Consistency Checklist (Checklist) for determining whether development projects are consistent with the SSP. As discussed in the Checklist, the SSP addresses community GHG emissions at the programmatic level; projects demonstrated to be consistent with the SSP through use of the Checklist would result in less than significant contributions to climate change. The Checklist for the revised project is included as Appendix F. The project would be consistent with the existing General Plan and land use zoning designations, and therefore would be consistent with the land use assumptions used in the SSP. As demonstrated in the Checklist, the project would implement all applicable GHG reduction measures related to energy efficiency, solid waste, and clean energy required by the City's Sustainable Santee Plan. Specifically, the project would be consistent with the following goals applicable to the project:

Measure 2.1 – New residential construction meets or exceeds California Green Building Standards Tier 2 Voluntary Measures**.**

It will be completed as an item in the project's conditions of approval and as a note on the grading plan.

Measure 6.1 – Proposed project streets include sidewalks, crosswalks, and other infrastructure that promotes non-motorized transportation options.

While not applicable because the project is such size as to render this measure unfeasible, the Project does include sidewalks on both sides of Tyler Street..

Measure 6.2 – Proposed project installs bike paths to improve bike transit.

The Mobility Element or Active Transportation Plan call for bike paths in this area. Not applicable because the project is such size as to render this measure unfeasible.

Measure 7.1 – Install electric vehicle chargers in all new residential and commercial developments.
a. For new Single Family Residential, install complete 40 Amp electrical service and one e charger.

It will be completed as an item in the project's conditions of approval and as a note on the grading plan.

Measure 8.1 – Implement traffic flow improvement program.

Not applicable because the project is such size as to render this measure unfeasible.

Measure 9.1 – Reduce waste at landfills.

While not applicable because the project is such size as to render this measure unfeasible., the Project will be required to divert construction waste to recycling facilities.

Measure 10.1 – Increase distributed energy generation within City of Santee by implementing the following applicable photovoltaic solar systems: a. Single family residential to install at least 2kW per unit of PV solar systems, unless the installation is infeasible due to poor solar resources established in a solar feasibility study prepared by a qualified solar consultant submitted with an application.

It will be completed as an item in the project's conditions of approval and as a note on the grading plan.

IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion: Source(s): Project Description.

The project includes construction of single-family residential housing development. Construction of the project would involve standard grading and construction activities, which require temporary use of fuels and other hazardous materials. Construction of the project would involve standard grading and construction activities that require temporary use of fuels and other hazardous materials. The use and handling of materials associated with the construction of the project would follow all applicable federal, state, and local regulations, including California Occupational Safety and Health Administration, California Department of Transportation (Caltrans), and Department of Environmental Health Hazardous Materials Division. The project would comply with all applicable state and local regulations for hazardous materials and waste management during project construction and operation of the 14 lot single-family residential development.

The proposed residential uses would involve the routine use of hazardous materials (cleaners, degreasers, etc.). However, such materials are ubiquitous and product labeling identifies appropriate handling and use of these materials. Use of common household hazardous materials are typical of residential uses and are not associated with generation of significant hazards to the public or the environment. Thus, operation of the project would result in a less than significant hazard associated with the routine transport, use, or disposal of hazardous materials would occur.

As a result, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Project impacts would be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): Project Description. See Section VII. a) above.

The project would not involve a use that would result in foreseeable upset and accident conditions from the release of hazardous materials into the environment. The property supports no existing structures. No demolition is required that could be a source of hazardous materials. The proposed residential uses would be associated with the routine use of common hazardous materials; however, no significant hazards due to upset and accident conditions involving the release of hazardous materials would occur because use of common hazardous materials are typical of residential uses and are not associated with generation of significant hazards to the public or the environment. Impacts would be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): Santee School District website.

The project site is not located within one-quarter mile of an existing or proposed school. As a result, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): California Department of Toxic Substances Control, EnviroStor Database; Geotracker Database.

The project site is not identified on the California Department of Toxic Substances Control, Hazardous Waste and Substances Site List compiled pursuant to Government Code Section 65962.5. Additionally, existing residential development are already located directly adjacent to this site. As a result, the project would not create a significant hazard to the public or the environment as a result of being located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. Project impacts would be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): San Diego Regional Airport Authority, Airport Land Use Commission Consistency Determination dated January 2, 2020.

Aeronautical Study Number 2018- AWP-10540-OE.

A Determination was issued by the Federal Aviation Administration (FAA) concerning:

Structure:	Building Houses
Location:	Santee, CA
Latitude:	32-49-45.00N NAD 83
Longitude:	117-00-38.00W
Heights:	510 feet site elevation (SE)
	20 feet above ground level (AGL)
	530 feet above mean sea level (AMSL)

The FAA has reviewed the aeronautical study in of current aeronautical operations in the area of the structure and finds that no significant aeronautical changes have occurred which would alter the determination issued for this structure. Accordingly, pursuant to the authority delegated to me, the effective period of the determination issued under the above cited aeronautical study number is hereby extended and will expire on 07/02/2021 unless otherwise extended, revised, or terminated by this office. You must adhere to all conditions identified in the original determination.

This extension issued in accordance with 49 U.S.C., Section 44718 and, if applicable, Title 14 of the Code of Federal Regulations, part 77, concerns the effect of the structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

Based on this evaluation, marking and lighting are not necessary for aviation safety. Project impacts would be less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan Safety Element; Santee Fire Department.

The project includes provision for emergency response access.

The project site is located in an existing developed area with access to major roadways that would allow for emergency evacuation. In addition, the project has been reviewed and approved by the Fire Marshal with the preparation, coordination and approval of a Fire Protection Plan (FPP; Dudek, 2022). Through this review, it has been shown that the project would not impair implementation of, or physically interfere with, emergency response and impacts would be less than significant.

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

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion: Source(s): General Plan, Safety and Conservation Elements; Santee Municipal Code-Urban Wildland Interface, Tyler Street Brush Management Zone Assessment; Dudek, April 2020 – updated November 2020.

The project site is located adjacent to and within an urbanized area and is not within or adjacent to a California Department of Forestry State Responsibility Area for wildland fire protection. Fuel Modification Zones (FMZ) will be provided around all new single-family development lots within the Project development that are adjacent to open space areas. All dwelling units on the Project site will be highly ignition resistant based on required construction design, materials, and methods. There are six lots that cannot achieve a full 100 feet of FMZ on the Project property for various reasons, including property boundary constraints (Lots 1 through 3), being adjacent to an open space easement area (Diegan Sage Scrub Easement per document 1994-0535919 recorded 9-8-94) for the Diegan coastal sage scrub located in the southeastern portion of the Project site (adjacent to Lots 7 and 8), or an ephemeral drainage channel abuts the northeastern portion of Lots 1 through 5). To mitigate for the reduced FMZs on Lots 1 through 6, the Project's applicant will apply for a 1602 Permit, which is a Lake and Streambed Alteration Program by the CA Department of Fish and Wildlife that would allow for 30% thinning (Zone 2) of the dead and dying material or mowing non-native grasses to lower than 4-inches (if present) within these Drainage areas and by doing so, allowing Lots 3 through 6 to achieve a full 100 feet of fuel modification, Additionally, a 6-foot concrete masonry unit (CMU) fire wall will be installed along the property boundary adjacent to Lots 1 through 3 and code exceeding construction and landscape alternatives are proposed for Lots 1 through 3.

In order to mitigate and to provide the remaining FMZ along the southern and southeastern sides of Lots 7 and 8 within the Diegan Sage Scrub easement areas a small portion of the easement area (Zone 1) and 30% thinning (Zone 2) of the dead and dying material or mowing non-native grasses to lower than 4-inches (if present) within this Diegan Sage Scrub easement area will be within the FMZ. By doing so, Lots 7 and 8 will be able to provide a full 100 feet of FMZ in all directions, including achieving a full 50-ft. irrigated Zone 1 and a full 50-ft. thinning Zone 2. Zone 1 BMZ impacts are considered significant and if required, additional on-site mitigation would be required at a 2:1 mitigation ratio; this mitigation would be completed onsite within the proposed open space areas along the western side of the development. Zone 2 BMZ impacts are considered impact neutral and not considered a significant biological impact. As a result, no compensatory mitigation is required for Zone 2 impacts, including offsite Zone 2 BMZ impacts. Additional code exceeding construction and landscape alternatives that provide the same practical effect as the 100 feet FMZ will also be provided for Lots 7 and 8.

Proposed Mitigation Measures and Recommendations

The following are City and State fire and building code required measures for building in wildland urban interface areas.

1. The proposed Tyler Street 14-lot single-family residential subdivision achieves a minimum 50 feet of on-site FMZ for every lot, and Lots 6 through 14 achieve a full 100 feet of FMZ (50 feet irrigated Zone 1 and 50 feet of a thinned Zone 2) without the need to provide additional mitigation. Lots 1 through 8 are unable to achieve a full 100 feet of FMZ within

the property limits; these lots are able to achieve between 50 and 100 feet of FMZ and will be required to implement the code exceeding mitigation measures described below.

2. Each of the new single-family residential structures within the proposed Tyler Street 14-lot subdivision site will be code compliant, ignition resistive, and fully-sprinklered in compliance with applicable portions of the City of Santee Municipal Code, as well as with the 2019 edition of the California Building Code (CBC), Chapter 7A (or then current edition); 2019 edition of the California Fire Code (CFC), Chapter 49 (or then current edition); and 2019 edition of the California Residential Code (CRC), Section 237 (or then current edition), as adopted by the City;

3. All rooms and enclosed spaces within each of the new single-family residences, including within the garages, will be provided with an NFPA 13D fire sprinkler system with additional coverage. The NFPA 13D system is required:

a. To be designed by a licensed fire protection engineer or SFD-approved sprinkler contractor.

b. To provide fire inspector's test value five feet above grade. To install a fire sprinkler box in garage with wrench and three heads of each type used in design of fire sprinkler system;

c. To provide sufficient water supply as determined by fire sprinkler hydraulic calculations, which may require increased meter and piping size. If fire flow is insufficient for the designed system, alternative options, such as a fire pump designed to boost fire flow, may be considered, to the approval of SFD. Alternative options will be submitted to SFD for approval before installation;

d. Automatic or self-closing doors shall be installed and conform to the exterior door assembly standards addressed in Chapter 7 of the CBC;

4. A fire alarm system shall be installed in accordance with NFPA 72, Fire Protection Signaling System and SFD requirements, for monitoring the flow switch and inter-connection with the dwellings' smoke detectors. The fire alarm system will be supervised by a third-party alarm company. The system will be tested annually, or as needed, with test results provided to SFD;

5. Zone 1 requires a minimum 50 feet of irrigated landscape planted with drought-tolerant, fire resistive plants. No undesirable, highly flammable plant species shall be planted. The landscaping will be routinely maintained and will be watered by an automatic irrigation system that will maintain healthy vegetation with high moisture contents that would prevent ignition by embers from a wildfire;

6. The new residential design also provides an unimpeded, all-weather pathway (minimum three feet wide) on all sides of the residential structures for firefighter access around the entire perimeter of the structure;

Code Exceeding Mitigation Measures As previously mentioned, due to site constraints, it is not possible to achieve the full 100 feet FMZ width for every lot of the proposed Tyler Street 14-lot subdivision Project. As such, this Preliminary Fire Assessment Summary Letter details both required elements for constructing a residential structure in a very high fire hazard severity area, as well as additional measures that will be implemented to mitigate for the lots with non-conforming fuel modifications zones. These measures are customized for this site based on the analysis results and focus on providing functional equivalency as a City defined, full fuel modification zone.

The following are City and State fire and building code required measures to be implemented per the requirements for building in wildland urban interface areas.

1. The proposed Tyler Street 14-lot single-family residential subdivision achieves a minimum 50 feet of onsite FMZ for every lot, and Lots 6 through 14 achieve a full 100 feet of FMZ (50 feet irrigated Zone 1 and 50 feet of a thinned Zone 2) without the need to provide additional mitigation. Lots 1 through 8 are unable to achieve a full 100 feet of FMZ within the property limits; these lots are able to achieve between 50 and 100 feet of FMZ and will be required to implement the code exceeding mitigation measures described below.

2. Each of the new single-family residential structures within the proposed Tyler Street 14-lot subdivision site will be code compliant, ignition resistive, and fully-sprinklered in compliance with applicable portions of the City of Santee Municipal Code, as well as with the 2019 edition of the California Building Code (CBC), Chapter 7A (or then current edition); 2019 edition of the California Fire Code (CFC), Chapter 49 (or then current edition); and 2019 edition of the California Residential Code (CRC), Section 237 (or then current edition), as adopted by the City;

3. All rooms and enclosed spaces within each of the new single-family residences, including within the garages, will be provided with an NFPA 13D fire sprinkler system with additional coverage. The NFPA 13D system is required:

   a. To be designed by a licensed fire protection engineer or SFD-approved sprinkler contractor.
   b. To provide fire inspector's test value five feet above grade. To install a fire sprinkler box in garage with wrench and three heads of each type used in design of fire sprinkler system;
   c. To provide sufficient water supply as determined by fire sprinkler hydraulic calculations, which may require increased meter and piping size. If fire flow is insufficient for the designed system, alternative options, such as a fire pump designed to boost fire flow, may be considered, to the approval of SFD.

   Alternative options will be submitted to SFD for approval before installation; d. Automatic or self-closing doors shall be installed and conform to the exterior door assembly standards addressed in Chapter 7 of the CBC;

4. A fire alarm system shall be installed in accordance with NFPA 72, *Fire Protection Signaling System* and SFD requirements, for monitoring the flow switch and inter-connection with the dwellings' smoke detectors. The fire alarm system will be supervised by a third-party alarm company. The system will be tested annually, or as needed, with test results provided to SFD;

5. Zone 1 requires a minimum 50 feet of irrigated landscape planted with drought-tolerant, fire resistive plants. No undesirable, highly flammable plant species shall be planted. The landscaping will be routinely maintained and will be watered by an automatic irrigation system that will maintain healthy vegetation with high moisture contents that would prevent ignition by embers from a wildfire;

6. The new residential design also provides an unimpeded, all-weather pathway (minimum three feet wide) on all sides of the residential structures for firefighter access around the entire perimeter of the structure;

The following code exceeding mitigation measures are being provided for nonconforming lots unable to achieve a full 100 feet of fuel modification (Lots 1 through 5, 7 and 8). These code exceeding mitigations were found to meet or exceed the code required 100 feet fuel modification zones through science and application and were accepted by numerous fire agencies throughout California:

1. To mitigate for the reduced FMZs on Lots 1 through 6, the Project's applicant will apply for a 1602 Permit, which is a Lake and Streambed Alteration Program by the CA Department of Fish and Wildlife that would allow for 30% thinning (Zone 2) of the dead and dying material or mowing non-native grasses to lower than 4-inches (if present) within these Drainage areas and by doing so, allowing Lots 3 through 6 to achieve a full 100 feet of fuel modification.

2. To mitigate for the reduced FMZs on and adjacent to Lots 7 and 8 and provide the remaining FMZ along the southern and southeastern sides of Lots 7 and 8 within the Diegan Sage Scrub easement areas, a program has been put in place by the Project's biologist that would allow for 30% thinning (Zone 2) of the dead and dying material or mowing non-native grasses to lower than 4-inches (if present) within this Diegan Sage Scrub easement area. Zone 2 BMZ impacts are not considered a significant biological impact. As a result, no compensatory mitigation is required for Zone 2 impacts, including offsite Zone 2 BMZ impacts (refer to Project's Biological Report for more information on mitigation).

3. Lots 1 through 8 will be required to be maintained as an extended irrigated Zone 1 FMZ landscape with drought-tolerant, fire resistive plants. The Zone 1 FMZ will extend up to the drainage channel adjacent to Lots 1 through 6 and up to the Diegan Sage Scrub easement areas adjacent to Lots 7 and 8. The extended irrigated Zone 1 landscape will include no undesirable, highly flammable plant species shall be planted, that will be routinely maintained and watered by an automatic irrigation system that will maintain healthy vegetation with high moisture contents that would prevent ignition by embers from a wildfire;

4. Because of property boundary constraints, Lots 1 through 3 are unable to achieve a full 100 feet of FMZ onsite. To mitigate for the reduced FMZ, a 6-foot high non-combustible CMU fire wall will be constructed along the rear lot line behind Lots 1 through 3 will be constructed. The fire wall will be installed to function as heat-deflecting walls.

5. In addition to the construction of a 6-foot high CMU wall, the Project proposes to provide exterior glazing in windows (and sliding glass doors, garage doors, or decorative or leaded glass doors) facing the open space and naturally vegetated areas to be dual pane with both panes tempered glass to mitigate for the reduced FMZ within Lots 1 through 3. Dual pane, one pane tempered glass has been shown during testing and in after fire assessments to significantly decrease the

risk of breakage and ember entry into structures. Therefore, requiring code-exceeding dual pane, both panes tempered is anticipated to be an important safety measure that provides enhanced structure protection and provides mitigation for reduced fuel modification zones and limited setbacks from adjacent structures. *The window upgrade also exceeds the requirements of Chapter 7A of the CBC and providing additional protection for the structure's most vulnerable, exterior side* (CODE EXCEEDING MITIGATION MEASURE);

6. Wildland exposed sides of the structures on Lots 1 through 3 shall also include 5/8-inch Type X fire rated gypsum sheathing applied behind the exterior covering or cladding (stucco or exterior siding) on the exterior side of the framing, from the foundation to the roof for a facade facing the open space and naturally vegetated areas. 5/8-inch Type X fire rated gypsum sheathing is required to be manufactured in accordance with established ASTM standards defining type X wallboard sheathing as that which provides not less than one-hour fire resistance when tested in specified building assemblies and has been tested and certified as acceptable for use in a one-hour fire rated system. CertainTeed Type X Gypsum Board has a Flame Spread rating of 15 and Smoke Developed rating of 0, in accordance with ASTM E 84, (UL 723, UBC 8-1, NFPA 255, CAN/ULC-S102); UL classified for Fire Resistance (ANSL/UL 263; ASTM E119) and listed under UL File No. CKNX.R3660 (Certainteed, 2021). Please refer to the specification in Attachment 5_for a more detailed description of CertainTeed 5/8-inch Type X Fire Rated Gypsum sheathing (or similar product) CODE EXCEEDING MITIGATION MEASURE;

7. Areas requiring ventilation to the outside environment will require ember-resistant vents such as Brandguard, Vulcan, or O'Hagin brands. These vents exceed the code requirement of a minimum 1/16-inch not to exceed 1/8-inch openings. All vents used for this project will be approved by SFD. Please refer to the specification in Attachments 6 and 7 for a more detailed description of Brandguard, Vulcan, and O'Hagin ventilation brands. These use of these ember resistant vents are a CODE EXCEEDING MITIGATION MEASURE;

8. Non-combustible fencing shall be required to be installed for areas within Fire Hazard Severity Zones and/or Wildland Urban Interface Areas, including within five feet of every structure and along the side yards of each residence (Santee Municipal Code, Chapter 11.18.020, Section 4908.1). Dudek agrees with the requirements for avoiding wood/combustible fences on perimeter lots that abut unmaintained open space areas. However, the use of Kroy Vinyl Fencing (see *Attachment 8 – Kroy Vinyl Fencing Fire Rating*) or fire retardant treated lumber, such as Hoover's lumber product, are considered acceptable fencing materials to use for the proposed interior 6-foot high fencing (see Attachment 9 – OSFM Approved Hoover X);

9. No eave overhangs. By requiring no eaves instead of the code required boxed eaves, the structure eliminates the ability of capturing hot air and embers that may circulate under a boxed eave and instead allows the hot air to either bounce off the side of the structure or fly over the structure entirely (CODE EXCEEDING MITIGATION MEASURE);

10. Annual FMZ Inspections. Yearly fuel modification maintenance shall be required by the Project's HOA and each individual property owner. The communities HOA as well as individual property owners, shall be responsible for obtaining an FMZ inspection and report from a qualified SFD-approved 3rd party inspector in May of each year certifying that vegetation management activities throughout the Project site and within each individual lot have been performed pursuant to this Fire letter. This includes verifying that wood bark and other combustible mulches shall not be used within the first 5 feet from the homes. See details regarding the fuel modification zone vegetation maintenance program below (CODE EXCEEDING MITIGATION MEASURE).

For Lots 1 through 3 that are unable to achieve the full 100-foot FMZ, windows (and sliding glass doors, garage doors, or decorative or leaded glass doors) facing the open space and naturally vegetated areas will be required to be dual pane with both panes tempered glass. Additionally, the exposed sides of structures shall include 5/8-inch Type X fire rated gypsum sheathing applied behind the exterior covering or cladding (stucco or exterior siding) on the exterior side of the framing, from the foundation to the roof for a facade facing the open space and naturally vegetated areas. The installation of the 5/8-inch Type X fire rated gypsum sheathing increases a wall's fire rating to a minimum of 1 hour, from the 30-minute rating for standard ½-inch drywall. Also, yearly fuel modification maintenance shall be required for all 14 lots by the Project's HOA and each individual property owner.

The communities HOA as well as individual property owners, shall be responsible for obtaining an FMZ inspection and report from a qualified SFD-approved 3rd party inspector in May of each year. Dudek has found that the code exceeding mitigation measures provided have been used for many other similar successful projects and demonstrate that they meet or exceed the code required 100 feet fuel modification zone. Fire behavior modeling, as previously presented, was used to predict flame lengths and was not intended to determine sufficient fuel modification zone widths. However, the results of the fire modeling provide important fire behavior projections, which is key supporting information for determining buffer widths that would minimize structure ignition and provide "defensible space" for firefighters. With that said, it is

anticipated that the proposed structures will be able to withstand the short duration, low to moderate intensity fire and ember shower that is projected from off-site, adjacent fuels based on several factors, as discussed below.

Justification for Reduced Fuel Modification Zones

As presented in this Preliminary Fire Assessment, Fire Behavior Analysis, and FMZ Recommendations Summery Letter Report, the FMZs provided for the proposed Tyler Street Project are not standard FMZs. Rather, Lots 1-8 -cannot achieve the required 100 feet of FMZ due to lot constraints and Project boundary limitations. However, by applying for a 1602 Permit, which would allow for 30% thinning (Zone 2) of the dead and dying material or mowing non-native grasses to lower than 4-inches (if present) within the Drainage areas along the northern property boundary, Lots 3 through 6 would ultimately be able to achieve a full 100 feet of fuel modification, Additionally, the construction of a 6-foot CMU fire wall along the rear property boundary adjacent to Lots 1 through 3, will function as heat-deflecting wall and stop the progression of a ground fire from advancing into the rear yards of these lots. Furthermore, to mitigate and provide the remaining FMZ along the southern and southeastern sides of Lots 7 and 8 within the Diegan Sage Scrub easement areas, a program has been put in place by the Project's biologist that would allow for irrigating within a small portion of the easement area (Zone 1) and 30% thinning (Zone 2) of the dead and dying material or mowing non-native grasses to lower than 4-inches (if present) within this Diegan Sage Scrub easement area. By doing so, Lots 7 and 8 will be able to provide a full 100 feet of FMZ in all directions, including achieving a full 50-ft. irrigated Zone 1 and a full 50-ft. thinning Zone 2. Zone 1 BMZ impacts are considered significant and if required, additional on-site mitigation would be required at a 2:1 mitigation ratio; this mitigation would be completed onsite within the proposed open space areas along the western side of the development. Zone 2 BMZ impacts are considered impact neutral and not considered a significant biological impact. As a result, no compensatory mitigation is required for Zone 2 impacts, including offsite Zone 2 BMZ impacts. Additional code exceeding construction and landscape alternatives that provide the same practical effect as the 100 feet FMZ will also be provided for Lots 7 and 8.

- Structure Ignition

There are two primary concerns for structure ignition: 1) radiant and/or convective heat and 2) burning embers (NFPA 1144 2008, IBHS 2008, and others). Burning embers have been a focus of building code updates for at least the last decade, and new structures in the WUI built to these codes have proven to be very ignition resistant. Likewise, radiant and convective heat impacts on structures have been minimized through the Chapter 7A exterior fire ratings for walls, windows and doors. Additionally, provisions for modified fuel areas separating wildland fuels from structures have reduced the number of fuel-related structure losses. As such, most of the primary components of the layered fire protection system provided for the Tyler Street Project are required by the City of Santee and State codes but are worth listing because they have been proven effective for minimizing structural vulnerability to wildfire and, with the inclusion of required interior sprinklers (required in the 2013 Building/Fire Code update), of extinguishing interior fires, should embers succeed in entering a structure. Even

though these measures are now required by the latest Building and Fire Codes, at one time, they were used as mitigation measures for buildings in WUI areas, because they were known to reduce structure vulnerability to wildfire. These measures performed so well, they were adopted into the code. The following project features are required for this new development in WUI areas and form the basis of the system of protection necessary to minimize structural ignitions as well as providing adequate access by emergency responders:

1. Application of Chapter 7A, ignition resistant building requirements
2. Minimum 1-hour rated exterior walls and doors
3. Multi- pane glazing with a minimum of one tempered pane, fire-resistance rating of not less than 20 minutes when tested according to NFPA 257, or be tested to meet the performance requirements of State Fire Marshal Standard 12-7A-2. For lots unable to achieve the full 100 feet of FMZs (Lots 1 through 5, 7 and 8) dual pane dual tempered glass windows will be installed on the exposed sides of the new residential structures. Dual pane, one pane tempered glass has been shown during testing and in after fire assessments to significantly decrease the risk of breakage and ember entry into structures. Therefore, requiring code-exceeding dual pane, both panes empered is anticipated to be an important safety measure that provides enhanced structure protection and provides mitigation for reduced fuel modification zones and limited setbacks from adjacent structures. *The window upgrade also exceeds the requirements of Chapter 7A of the CBC and providing additional protection for the structure's most vulnerable, exterior side.*
4. Ember resistant vents (recommend BrandGuard or similar vents)
5. Automatic, interior fire sprinkler system to code for occupancy type.

- Fuel Separation

As experienced in numerous wildfires, including the most recent fire storms in San Diego County (2003 and 2007), homes in the WUI are potential fuel. The distance between the wildland fire that is consuming wildland fuel and the home ("urban fuel") is the primary factor for structure ignition (not including burning embers). The closer a fire is to a

structure, the higher the level of heat exposure (Cohen 2000). However, studies indicate that given certain assumptions (e.g., 10 meters of low fuel landscape, no open windows), wildfire does not spread to homes unless the fuel and heat requirements (of the home) are sufficient for ignition and continued combustion (Cohen 1995, Alexander et al. 1998). Construction materials and methods can prevent or minimize ignitions. Similar case studies indicate that with nonflammable roofs and vegetation modification from 10 to 18 meters (roughly 32 to 60 feet) in southern California fires, 85% to 95% of the homes survived (Howard et al. 1973, Foote and Gilless 1996). Similarly, San Diego County after fire assessments indicate strongly that the building codes are working in preventing home loss: of 15,000 structures within the 2003 fire perimeter, 17% (1,050) were damaged or destroyed. However, of the 400 structures built to the 2001 codes (the most recent at the time), only 4% (16) were damaged or destroyed. Further, of the 8,300 homes that were within the 2007 fire perimeter, 17% were damaged or destroyed. A much smaller percentage (3%) of the 789 homes that were built to 2001 codes were impacted and an even smaller percentage (2%) of the 1,218 structures built to the 2004 Codes were impacted (IBHS 2008). Damage to the structures built to the latest codes is likely from flammable landscape plantings or objects next to structures or open windows or doors (Hunter 2008).

These results support Cohen's (2000) findings that if a community's homes have a sufficiently low home ignitability, the community can survive exposure to wildfire without major fire destruction. This provides the option of mitigating the wildland fire threat to homes/structures at the residential location without extensive wildland fuel reduction. Cohen's (1995) studies suggest, as a rule-of-thumb, larger flame lengths and widths require wider fuel modification zones to reduce structure ignition. For example, valid SIAM results indicate that a 20-foot-high flame has minimal radiant heat to ignite a structure (bare wood) beyond 33 feet (horizontal distance). Whereas, a 70-foot-high flame requires about 130 feet of clearance to prevent structure ignitions from radiant heat (Cohen and Butler 1996). This study utilized bare wood, which is more combustible than the ignition resistant exterior walls for structures built today. Obstacles, including steep terrain and non-combustible fire walls can block or deflect all or part of the radiation and heat, thus making narrower fuel modification distances possible. Fires in ravines, chutes, coves, drainages, and steep-sided canyons can, under specific conditions, result in an upward draft, similar to a fireplace chimney. Chimneys on the landscape are created when air is drawn in from lower elevations, creating strong upslope drafts. The result can be acceleration of radiant and convective heat as well as actual fire spread, similar to opening the damper in a fireplace chimney. Areas where the terrain includes a restriction or narrowing can result in this type of acceleration. The terrain features adjacent the Project site include few mild examples of these "chimneys" that are not expected to significantly alter fire behavior.

- Heat Deflecting Walls

The reduced lot sizes of Lots 1 through 3 which are adjacent to a vacant property to the north are areas of concern and provide an opportunity to place a non-combustible, six-foot tall, heat-deflecting wall (lower 1 to 2 feet block wall and upper 4 to 5 feet dual pane, one pane tempered glazing or a six-foot high CMU block wall) to provide additional deflection for these lots to compensate for the reduced fuel modification zones. Walls like these have proven to deflect heat and airborne embers on numerous wildfires in San Diego, Orange, Los Angeles, Ventura, and Santa Barbara County. Rancho Santa Fe Fire Protection District, Laguna Beach Fire Department, Orange County Fire Authority, and others utilize these walls as Alternative methods based on observed performance during wildfires. This has led to these agencies approving use of non-combustible landscape walls as mitigations for reduced fuel modification zones and reduced setbacks at top of slope. These walls are consistent with NFPA 1144 Standard for Reducing Structure Ignition Hazards from Wildland Fire – 2008 Edition, Section 5.1.3.3 and A.5.1.3.3 and International Urban Wildland Interface Code (ICC 2012). NFPA 1144, A.5.1.3.3 states: "Noncombustible walls and barriers are effective for deflecting radiant heat and windblown embers from structures." These walls and barriers are usually constructed of noncombustible materials (concrete block, bricks, stone, stucco) or earth with emergency access openings built around a development where 30 feet (9 meters) of defensible space is not available.

- Non-Combustible Fencing

The side yard fencing is proposed to use vinyl fencing. The fence returns to the structure (the portion of the fence that attaches to the house and extends perpendicular to the house until it attaches to the property line fencing) would be of a non-combustible material, possibly including masonry, steel, fire retardant-treated wood, or other fire department-approved materials. This fencing arrangement conforms with best practices to minimize the likelihood that fencing material enables fire a pathway to the structure by 1) using non-combustible materials at the wildland interface, 2) ensuring that the fence return to the structure is non-combustible, and 3) utilizing a vinyl product, separated from both the wildland fuels and the structure, that has been fire rated and shown to not sustain burning. Although there are no current Office of the State Fire Marshal (OSFM)-approved listings for vinyl fencing materials, the Kroy CertainTeed Bufftech vinyl fencing proposed by Cornerstone Communities includes a fire rating indicating that it has been fire tested to ASTM standards and performed well and that it exhibits no sustained burn, and can be considered self-extinguishing Dudek has evaluated the use of exterior fire-retardant treated lumber for the rear- or side-yard fencing on perimeter residential lots within the Tyler Street residential community Project. Dudek has determined that the ignition resistant construction requirements for structures remain applicable and valid. However, fire retardant treated lumber, such as

Hoover's lumber product, can be used to substitute for solid block, solid masonry or solid steel in areas designated as a high fire hazard. Per the Office of the State Fire Marshal (OSFM) website, Listing Number 2520-1701:0100 – Hoover Treated Lumber with Exterior Fire X is an approved building material listing product for high fire hazard areas (See Attachment 9 – OSFM Approved Listing 2520-1701:0100). It should be noted that there currently is not an OSFM approved listing for vinyl fencing materials.

- Fuel Modification Area Vegetation Maintenance

All fuel modification area vegetation management shall be completed annually by May 1 of each year and more often as needed for fire safety, as determined by the SFD. The project HOA shall be responsible for all vegetation management throughout the common areas of the project site, in compliance with the requirements detailed herein and SFD requirements. Additionally, private lot owners will be responsible for installing their irrigated fuel modification zones. Prior to establishment of the irrigated fuel modification zone, the entire required irrigated fuel modification zone will be mowed to 4-inch stubble height until such time that the homeowner installs the irrigated fuel modification zone, which will be required to be in place within 6 months of structure occupancy. The residents shall maintain fuel modification zone(s) on their properties. Furthermore, the community CC&R's shall require the HOA to inspect rear yards along the perimeter and require owners to maintain their property in accordance with this Letter Report. Should owner not comply, HOA shall notify the SFD and the SFD will provide inspections per their internal standards.

- Annual Fuel Modification Zone Compliance Inspection

The property owner would obtain an FMZ inspection and report from a qualified SFD-approved 3rd party inspector in May of each year certifying that vegetation management activities throughout the Project Site have been performed pursuant to this Letter Report, including verifying that wood bark and other combustible mulches shall not be used within the first 5 feet from the homes. A copy of the annual inspection report would be provided to the Proposed Project HOA and a copy made available to SFD, if requested.

As a result of the proposed mitigation measures, potential impacts are Less than Significant with Mitigation Incorporated. The Project, with the specific mitigation measures incorporated, would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

X. HYDROLOGY AND WATER QUALITY. Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): General Plan, Conservation Element; Regional Water Quality Control Board Basin Plan; Preliminary Storm Water Mitigation Plan for Tyler Street dated April 1, 2019, prepared by Walsh Engineering and Surveying, Inc.

The project site is located in the San Diego Watershed, Lower San Diego Hydrologic Area, and Santee Hydrologic Sub-Area 907.12. The site drains to the San Diego River, which is impaired for sediments, nutrients, trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses, and pesticides. According to the San Diego Basin Plan, the beneficial uses of the San Diego River include water for industrial purposes, both contact and non-contact recreational uses, and for habitat purposes including warm freshwater habitat, wildlife habitat, and habitat for rare, threatened, or endangered species.

Because the project discharges to an area identified as appropriate for exemption by the Watershed Management Area Analysis (WMAA), this project is exempt from hydromodification flow control requirements.

This project will construct 29 rain gardens/biofiltration basins per Biofiltration (BF) -1 acting as one system which will be constructed along Tyler Street to retain the Design Capture Volume (DCV) of the 14 homes and Tyler Street extension to provide pollutant control. The proposed northeasterly slopes will be self-retaining. The entrance of the Tyler Street extension will be primarily de-minimus and any additional area past the de-minimus threshold will be compensated for by oversizing the proposed biofiltration basins to treat the entire DCV.

The project would have the potential to generate pollutants including trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses, pesticides, sediments, nutrients, heavy metals, and organic compounds, but would not adversely affect any beneficial uses of the San Diego River because the project would treat storm water on-site to ensure pollutants do not adversely affect receiving waters. With incorporation of these design features, potential pollutants would be treated on-site, and no significant sources of chemicals or compounds would contaminate surface water sources or decrease the quality of surface water to below standards established by the San Diego Regional Water Quality Control Board's Basin Plan, Surface Water Quality Objectives.

In addition, the project would incorporate construction and post-construction Best Management Practices (BMPs) in compliance with the City's Standard Urban Storm Water Mitigation Plan. For example, BMPs employed during the construction phase would include fiber rolls, street sweeping and vacuuming, and storm drain inlet protection. Therefore, as detailed in the project's Storm Water Mitigation Plan, impacts would be less than significant. Accordingly, the project would not violate any water quality standards or waste discharge requirements. Project impacts would be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion: Source(s): City of Santee, General Plan, Conservation Element; Padre Dam Municipal Water District

The project would obtain its water supply from the Padre Dam Municipal Water District and would not use groundwater supply for any purpose. Therefore, the project would not deplete supplies of groundwater resources, and no impact would occur.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): General Plan, Conservation Element; Regional Water Quality Control Board Basin Plan; Preliminary Storm Water Mitigation Plan for Tyler Street dated April 1, 2019, prepared by Walsh Engineering and Surveying, Inc.

The project would not substantially alter the existing drainage pattern as discussed in response for Section IX. c). The drainage basin in the pre and post developed condition is 74 acres in size.

The existing drainage is overland flow over the undeveloped land and flows into an existing ephemeral channel where it enters a storm drain system on Tyler street and discharges into the San Diego River. The runoff from the east is urban and drains to the ephemeral channel onsite through a series of storm drains and brow ditches.

In the proposed condition, drainage will continue to flow into the existing storm drain system located at the terminus of Tyler Street. A brow ditch will be constructed at the top of the southwesterly slope directing runoff from the south eastward into the existing ephemeral channel and to the west around the project. The drainage from the west will be directed to a storm drain pipe where it will confluence with the existing storm drain system on Tyler street. Runoff from the 14 homes and Tyler Street extension will flow into the curb and gutter and conveyed into a series of rain gardens/biofiltration basins on both sides of the street designed per City of Santee BMP Design Manual fact sheet BF-1 for pollutant control. The Padre Dam access road will drain into a tree well per City of Santee BMP Design Manual Site Design-1 (SD-1) for treatment.

Thus, the project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate of amount of surface runoff in a manner which would result in flooding on-or off-site. Project impacts would be less than significant.

i. result in substantial erosion or siltation on- or off-site;

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): Source(s): General Plan, Conservation Element; Regional Water Quality Control Board Basin Plan; Preliminary Storm Water Mitigation Plan for Tyler Street dated April 1, 2019, prepared by Walsh Engineering and Surveying, Inc.

Topography of the project development site is gradually sloping with a wetland channel in the low lying portion of the site, immediately downslope of the proposed development. In the proposed condition, drainage will continue to flow into the existing storm drain system located at the terminus of Tyler Street. A brow ditch will be constructed at the top of the southwesterly slope directing runoff from the south eastward into the existing ephemeral channel and to the west around the project. The drainage from the west will be directed to a storm drain pipe where it will confluence with the existing storm drain system on Tyler street. Runoff from the 14 homes and Tyler Street extension will flow into the curb and gutter and conveyed into a series of rain gardens/biofiltration basins on both sides of the street designed per fact sheet BF-1 for pollutant control. The Padre Dam access road will drain into a tree well per SD-1 for treatment. All runoff would ultimately be discharged to the San Diego River and therefore would be exempt from hydromodification requirements.

The project would not substantially alter the drainage pattern of the site or the surrounding area in a manner that could result in substantial erosion because project drainage would be retained on-site prior to discharge to the river, which would prevent erosion. The site design directs flows to landscaped areas. With implementation of the proposed BMPs, including bio-retention swales and proposed landscaping, the project would not result in substantial erosion or siltation on-or off-site. Thus, the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on-or off-site. Project impacts would be less than significant.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Conservation Element. Surface hydrology and hydraulic Calculations for Padre Hills TM 83-04 Santee, San Diego County California; May, 1990 by HCH Partners

No structures are proposed within the floodplain. See response Section VIII. d). As a result, a less than significant impact related to risk of loss, injury or death involving flooding would occur. As indicated in the hydrology study prepared for the adjacent developed property to the north, *Surface hydrology and hydraulic Calculations for Padre Hills TM 83-04 Santee* (May, 1990), the existing and proposed drainage improvements are adequately sized to convey the 100-year flood event. As a result, the project will NOT substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Project impacts would be less than significant.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): Source(s): Preliminary Storm Water Mitigation Plan for Tyler Street dated April 1, 2019, prepared by Walsh Engineering and Surveying, Inc. and the Drainage Study for Tyler Street dated April 3, 2019, prepared by Walsh Engineering and Surveying, Inc. Surface hydrology and hydraulic Calculations for Padre Hills TM 83-04 Santee, San Diego County California; May, 1990 by HCH Partners

The increase in runoff rates resulting from the increase in impervious surfaces would be offset through the use of a biofiltration basin sized to retain storm water and capture pollutants from runoff that leaves the site. With the retention of runoff in an appropriately sized biofiltration basin, project runoff would not exceed the capacity of storm water drainage systems and would not provide substantial sources of polluted runoff.

In the proposed condition, the project will have a peak flow rate of 103 cubic feet per second during the 100 year storm event. The downstream facilities has a capacity of 141 cubic feet per second per the approved Drainage Study from HCH Partners. See responses to Section VIII. a), c), and d) above. Project impacts would be less than significant.

iv. impede or redirect flood flows?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion: Source(s):

Source(s): General Plan, Conservation Element; Regional Water Quality Control Board Basin Plan; Preliminary Storm Water Mitigation Plan for Tyler Street dated April 1, 2019, prepared by Walsh Engineering and Surveying, Inc. Surface hydrology and hydraulic Calculations for Padre Hills TM 83-04 Santee, San Diego County California; May, 1990 by HCH Partners

The project would not substantially alter the existing drainage pattern as discussed in response for Section IX. c). Topography of the project development site is gradually sloping with a wetland channel in the low-lying portion of the site, immediately downslope of the proposed development. In the proposed condition, drainage will continue to flow into the existing storm drain system located at the terminus of Tyler Street. A brow ditch will be constructed at the top of the southwesterly slope directing runoff from the south eastward into the existing ephemeral channel and to the west around the project. The drainage from the west will be directed to a storm drain pipe where it will confluence with the existing storm drain system on Tyler street. Runoff from the 14 homes and Tyler Street extension will flow into the curb and gutter and conveyed into a series of rain gardens/biofiltration basins on both sides of the street designed per fact sheet BF-1 for pollutant control. The Padre Dam access road will drain into a tree well per SD-1 for treatment. All runoff would ultimately be discharged to the San Diego River and therefore would be exempt from hydromodification requirements.

The project would not substantially alter the drainage pattern of the site or the surrounding area because project drainage would be retained on-site prior to discharge to the river, which neither impedes or redirects flood flows. The site design directs flows to landscaped areas. With implementation of the proposed BMPs, including bio-retention swales and proposed landscaping, the project would not result in substantial erosion or siltation on-or off-site. Thus, the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would impede or redirect flood flows on-or off-site. Project impacts would be less than significant.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): Project Plans.

The project site is located approximately 16 miles inland from the coast, at approximately 340 feet above mean sea level. The risk of tsunami is negligible due to the distance from the ocean and high elevation. There would be no risk from a seiche, as the site is not located near a body of water. The project would not be at risk for mudflow, because the there is no source of water above the proposed development. No impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee, General Plan, Conservation Element

The project would obtain its water supply from the Padre Dam Municipal Water District and would not use groundwater supply for any purpose. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact.

XI. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion: Source(s): City of Santee, General Plan, Land Use Element.

The project would develop additional residential units that would contribute to the established community in an area that is currently used for illegally dumping trash. The project site is within an urbanized area with direct access to Tyler Street and is consistent with the General Plan land use designation for residential use. No project features are proposed that would have the potential to physically divide an established community. No impact would occur.

b) 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?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Land Use Element

The project is not located within the coastal zone and no conflicts with any other policies, plans, or regulations have been identified. The proposed 14 single-family residences would be consistent with General Plan designation and zone of R-1 – Low Density Residential, with all residences clustered together within the northern portion of the property.

Onsite, adjacent to the eastern property boundary, an area totaling approximately 0.91 acres is located within an existing Open Space (OS) easement; Padre Dam Municipal Water District 'Diegan Sage Scrub Easement Plan – Mesa Road Reservoir'. A total of 0.05 acres of brush Management Zone 1 maintenance impacts are required to be completed within this existing OS. Mitigation for the loss of the on-native grassland habitat and dedicated OS is proposed; see biology section.

The Property is within the City of Santee draft Multiple Species Conservation Plan (MSCP) Subarea Plan and Multiple Habitat Preservation Area (MHPA) and Mission Trails Sub-Unit. A portion of the Property supports designated Critical Habitat for the coastal California gnatcatcher. 100% of the designated critical habitat is avoided and preserved.

The project has been designed and analyzed in compliance with City ordinances, the draft MSCP and draft MHPA and would not conflict with or prevent implementation of the draft MSCP/MHPA Subarea Plan. Additionally, the proposed residential uses would be compatible with the desired community character of the surrounding residential uses and density and would not conflict with any General Plan policies. The proposed residential structures have been designed to be compatible with the surrounding urban environment that consists of residential uses. As described in Sections 13.4, 13.5, 13.13, and 13.18, all potential environmental impacts would be mitigated to a level less than significant. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

As a result, the project would not conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Project impacts would be less than significant.

XII. MINERAL RESOURCES. Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Conservation Element.

In Santee, the areas with potential mineral resources are located primarily along the floodplain of the San Diego River and on hills underlain by granitic rocks. There are no known mineral resources on the project site. Classification is completed by the State Geologist into Mineral Resource Zones (MRZ). Classification of these areas is based on geologic and economic factors without regard to existing land use and land ownership. The site is listed as MRZ 3.

Construction of the proposed project has the potential to impact the mineral resources of both known and unknown significance in MRZ-3 on the project site The project would not result in the loss of availability of known mineral resources because mining activities would not be compatible with existing development in the surrounding area—including adjacent residential uses. Although there is the potential of mineral recovery from MRZ-3 area on the project site, in accordance with the Santee General Plan Conservation Element, economic, land use compatibility, and environmental protection factors must be considered when deciding on the appropriateness of mining in a particular area. Furthermore, the Santee General Plan designates the project site for Planned Development, not mineral resources extraction. Project impacts would be less than significant.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Element.

The project site is not officially delineated as having locally important mineral resources. See response to Section XII. a) above.

XIII. NOISE. Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): General Plan, Noise Element; Santee Municipal Code Construction Noise

Short-term noise impacts could occur during the construction of the project. Construction personnel and construction equipment and materials deliveries to the site would incrementally increase noise levels on local roads leading to the site. Although there would be a relatively high single event noise exposure potential causing intermittent noise nuisance (passing trucks), the effect on longer-term (hourly or daily) ambient noise levels would be small when compared to existing hourly/daily traffic volumes on Prospect Ave. On South Slope Street, Mesa Heights Road and Tyler Steet, the noise exposure due to construction vehicles accessing the site would be greater due to the lower volume of traffic; however, construction traffic along the road would be temporary and not be substantial in nature relative to the amount of

existing traffic in the project area. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the project site would be a less than significant impact.

Noise generated during excavation, grading, and building erection on the project site may also result in short-term noise impacts over the course of the construction schedule. Construction of the project site would be completed in phases, each of which would have its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. The City's Municipal Code Noise Ordinance (section 5.04.090) restricts construction noise between 7:00 a.m. and 7:00 p.m. on Mondays through Saturdays and all times on Sundays and holidays. If activities involving construction equipment with a manufacturer's noise rating of 85 dBA Lmax or greater will be operating for more than 10 consecutive workdays, a notice must be provided to all property owners and residents within 300 feet of the site no later than 10 days before the start of construction. The notice must be approved by the City and describe the project, the expected duration, and provide a point of contact to resolve noise complaints. A standard condition requires compliance with the above noise standards established in the Santee Municipal Code with regard to construction noise.

In terms of permanent operational noise, the General Plan Noise Element (Figure 7-3, Noise/Land Use Compatibility Guide) identifies the normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels for different land uses in the City. For family residential uses, such as the proposed project, noise levels up to 65 dBA are considered normally acceptable, with noise levels between 65 and 70 dBA being conditionally acceptable. Noise levels between 70 and 75 dBA are considered normally unacceptable for family uses, while noise levels in excess of 75 dBA are clearly unacceptable. The State Uniform Building Code establishes interior noise levels of 45 dBA Community Noise Equivalent Level (CNEL) for new residential unit types. When such structures are subject to exterior noise levels of 60 dBA day/night average sound level (Ldn) or greater, an acoustical analysis is required to show that the interior noise levels would not exceed 45 dBA Ldn. This regulation is enforced by the City's Building Inspection Department.

The proposed residential units would be setback over 600 feet from Prospect Avenue, the closest major roadway in the project area, 0.5 miles south of SR-52 and approximately 0.4 miles west of SR-125. According to Figure 7-2 of the Noise Element of the General Plan, the project site is outside the noise contour associate with future noise along these roads. The proposed residential units would be constructed west of the projected 60 dBA noise contour. Therefore, the units would be considered normally acceptable with the future traffic noise levels projected in the project area, which would be less than 65 dBA CNEL. With an exterior noise level of less than 60 dBA, the project would be able to achieve the 45 dBA CNEL interior noise level identified in the State Uniform Building Code using standard building construction techniques.

With regard the project's contribution to traffic noise in the project area, the new vehicle trips would primarily utilize Prospect Avenue, South Slope Street and Mesa Height Road to access the project site. In order for those project trips to create an audible increase in ambient transportation noise levels, they must double the existing daily trips along the affected roads. Due to the nature of the decibel scale, however, a doubling of traffic will result in a three-decibel increase in noise levels, which in and of itself would not normally be a perceivable noise increase. Traffic volumes would need to be increased at least three times to result in a readily perceivable (five decibel) increase in noise (Caltrans 2013). The addition 14 single family residential house daily trips to these roadways would not double the trips on those local roads or expose noise sensitive receptors to a substantial increase in ambient transportation noise.

Therefore, less than significant construction and operational noise impacts would occur.

b) Generation of excessive groundborne vibration or groundborne noise levels?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): Noise Element of the General Plan (2003); Santee Municipal Code; Construction Noise Analysis (2021a)

Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernible but without the effects associated with the shaking of a building there is less adverse reaction. Vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in ground distance. The City of Santee does not regulate construction vibration levels, only the hours of construction activities. Varying degrees of temporary ground-borne vibration would occur during project

construction, depending on the specific construction equipment used and the operations involved. The greatest levels of vibration for the project are anticipated to temporarily occur during the site preparation and soil compaction phases of construction, which are expected to require excavators, dozers, loaders, graders, backhoes and small vibratory roller. All other construction equipment pieces are expected to result in lower vibration levels and all vibration effects would cease upon completion of the construction activities. The adjacent properties contain single family residential structures which do not operate vibration sensitive equipment but would be temporarily exposed to ground-borne vibration during proposed construction. Residences in the project vicinity that are occupied during daytime construction may be exposed to ground-borne vibration that could result in temporary nuisance to daily activities, as well as have the potential to cause building damage if not controlled (Impact NOI-1).

To address this impact, the project would implement MM NOI-1 which outlines operating conditions required to avoid the potentially significant impact. Therefore, with mitigation incorporated into the project, construction phase ground-borne vibration would be a less than significant impact.

MITIGATION MEASURES

MM NOI-1: Construction-Related Ground-Borne Vibration. To avoid building damage or nuisance caused by ground-borne vibration during construction, the construction contractor shall comply with the following documentation and equipment and/or through -ground (or combination of horizontal and vertical) distance restrictions:

1. Prior to initiation of all construction activities, pre-construction building conditions shall be documented for all structures within 12 feet of grading activities.

2. When grading is required within 52 through-ground feet any residential structure, a small bulldozer or similar light equipment shall be used.

3. When soil compaction is required within 12 through-ground feet of any residential structure, a hand-operated tamper or walk-behind compactor shall be used, and the resident(s) of that structure shall be temporarily relocated until soil compaction within 12 through-ground feet of that structure is complete.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee General Plan, Safety Element, Gillespie Field Airport Land Use Compatibility Plan.

The project site is not located within either existing (2010) or projected future (2030) airport noise contours for the Gillespie Field Airport. No other public airports or airstrips are proximate to the project. Therefore, the project would not expose people to excessive noise levels from airport noise. No impact would occur.

XIV. POPULATION AND HOUSING. Would the project:

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan

The City's General Plan anticipates residential uses on this site. The proposed project would not be considered growth inducing because the project site is located within an established community, can be considered in-fill, and provides services typically found in residential communities. Less than significant impact.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee General Plan

The City's General Plan anticipates residential uses on this site. The site is vacant and would not remove any existing housing units/structures. Therefore, the project would not displace existing housing or people. No impact.

XV. PUBLIC SERVICES. Would the project:

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

i. Fire Protection?
ii. Police Protection?
iii. Schools?
iv. Parks?
v. Other Public Facilities?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee, General Plan, Safety Element; Fire Department.

Fire Protection: Based on a review of the project by the Santee Fire Department existing fire services are available to serve the proposed project and no new facilities would be needed. The City is a member of the San Diego County Central Zone for Fire and Emergency response. Each participating member has a mutual aid agreement with each other to provide paramedic and fire protection services in the event that additional fire-fighting units are required. As a result, service levels to the project site would be adequate, and no facilities would be required that could result in significant environmental impacts. No impact would occur.

Police protection: Police protection for the project area is provided by the San Diego County Sheriff's Department under contractual agreement with the City. Budget considerations and other special areas of concern are reflected in the staffing levels, which are addressed prior to renewal of the yearly contract between the City and the San Diego County Sheriff. As a result of ongoing evaluation of adequate staffing, existing police protection would be adequate to serve the project and the project would not necessitate the need for any new police facilities. A less than significant impact would occur.

Schools: Letters of availability from the Santee and Grossmont School Districts were received. This project is in the attendance boundaries of Chet F Harritt Elementary School. It is estimated that this development would generate 7 students. Based on this estimate, Chet F Harritt School can accommodate these new students.

The Grossmont Union High School District is responsible for providing education for students in grades 9 through 12. The subject project is within the District, more specifically it lies within the West Hills High School attendance area. The Grossmont Union High School District has a developer fee assessment policy. The current level of assessment is

$1.00 per square foot for residential and $.16 cents per square foot for commercial projects. At this time, there are no plans to construct a new school in the immediate vicinity of the proposed project.

A). The project would not necessitate the construction of new school facilities or create the need for new school facilities. The Project will pay the developer assessment fees required by the Grossmont Union High School District As a result, a less than significant impact would occur.

Parks: Source(s): City of Santee Parks and Recreation Facilities Master Plan; Municipal Code. a). The project would not adversely affect existing City park facilities or create the need for new park facilities with the additional fourteen single family homes. A less than significant impact would occur.

XVI. RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee Municipal Code. See response to Section XII. a).

The City's 2017 Parks and Recreation Master Plan Update identifies 265.82 acres for various park types in addition to approximately 272.25 acres of regional parkland, including Mission Trails and Goodan Ranch/Sycamore Canyon County Preserve. Approximately 190.91 acres of other recreational facilities, which include the Santee Aquatics Center and Santee Lakes Recreation Preserve, are also accessible to the City. Parks and recreation land in school playgrounds, ballfields, and courts accounts for an additional 109.24 acres in the City. The Recreation Element of the Santee General Plan includes an objective to "provide a minimum of 10 acres of parks 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." According to the Santee General Plan, almost every residence within the City is within 1 mile of a Neighborhood Park and within 3 miles of a Community Park.

As a result, the project would not adversely affect existing City Park facilities or create the need for new park facilities because the project is a 14-house single family residential development with back yards that could only incrementally increase demand for parks. As determined by the city, the 14-lot residential project is too small to require additional park area. The project would not necessitate the need for construction of new parks and would not result in a substantial physical deterioration of existing parks. As a result, a less than significant impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): Project Description. See response to XII. a)

No recreational facilities are required or proposed as part of the project. As a result, no impact would occur from the construction or expansion of recreational facilities.

XVII. TRANSPORTATION. Would the project:

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): Project Description, City Engineer, City of Santee General Plan, Circulation and Safety Elements, Metropolitan Transit System.

Due to the size and location of the 14-lot residential sub-division, the Project is exempt from preparing a project specific traffic report. With incorporation of standard project conditions that require construction (extension) of the public road, Tyler Street, impacts would be less than significant. The project would not result in significant impacts to roadway segments or intersections, and the project would not impede implementation of plans for mass transit or bicycle or pedestrian facilities. The project proposes sidewalks, which will provide access to the nearest bus station approximately 0.2 miles away. The project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities including polices of the City General Plan and would not decrease the performance or safety of these facilities. No impact would occur

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

☐ Potentially Significant Impact ☐Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): Project Description, City Engineer

As stated in: 15064.3. Determining the Significance of Transportation Impacts. - Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. The site is in a High Quality Transit area because it is within ½ mile from a bus transit service. The Project is approximately 1,300 feet from Prospect Street with access to public bus service and would therefore have less than significant transportation impact.

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

☐ Potentially Significant Impact ☐Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): Project Description.

The project's access would be from continuation of the existing Tyler street directly into the residential community. No hazards would result from proposed design features, and no incompatible uses have been identified in the project area that would increase hazards. Project impacts would be less than significant.

d) Result in inadequate emergency access?

☐ Potentially Significant Impact ☐Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): Project design; Santee Fire Department.

See response to Section XV. a) above. The project would provide adequate emergency access via the proposed extension of the existing public road Tyler Street. Therefore, the project's impacts would be less than significant impact.

XVIII. TRIBAL CULTURAL RESOURCES.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in the Public Resources Code section 5020.1(k), or

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Archaeological Survey Report, Brian F Smith dated May 3, 2018.

As described under Section V, Cultural Resources, cultural resources report (BFS, 2018) was prepared for the proposed residential development. The report concluded that mitigation monitoring would be necessary and will be conditioned. Notice shall be provided to the tribes on the City's AB 52 list. However, there is potential for buried unknown archaeological resources that may qualify as tribal cultural resources. Therefore, implementation of the following mitigation measures TCR-1 through TCR-9 and would reduce impacts to tribal cultural resources to less than a significant level.

TCR-1: The Permittee enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe(s) that is traditionally and culturally affiliated with the Project Location ("TCA Tribe") prior to issuance of a grading permit. The purposes of the agreement are (1) to provide the applicant with clear expectations regarding tribal cultural resources; and (2) to formalize protocols and procedures between the City and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains; funerary objects; cultural and religious landscapes; ceremonial items; traditional gathering areas; and cultural items located and/or discovered through a monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities.

TCR-2: Prior to issuance of a grading permit, the Permittee shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior, 2008), and a Native American monitor(s) associated with a TCA Tribe(s) to implement the monitoring program. The archaeologist shall be responsible for coordinating with the Native American monitor(s). This verification shall be presented to the City in a letter from the project archaeologist that confirms the selected Native American monitor(s) is associated with a TCA Tribe(s). The City, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.

TCR-3: The qualified archaeologist and a Native American monitor(s) shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.

TCR-4: During the initial grubbing, site grading, excavation or disturbance of the ground surface, the qualified archaeologist, or an archaeological monitor working under the direct supervisor of the qualified archaeologist, and the Native American monitor(s) shall be on site full-time. If imported fill materials, or fill used from other areas of the project site, are to be incorporated at the project site, those fill materials shall be absent of any tribal cultural resources. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of cultural resources that qualify as historical, unique archaeological, and/or tribal cultural resources. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor(s), shall be responsible for determining the duration and frequency of monitoring.

TCR-5: In the event that previously unidentified cultural resources that qualify as historical, unique archaeological, and/or tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor(s) shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to

allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

TCR- 6: If a cultural resource is discovered that may qualify as a historical, unique archaeological, and/or tribal cultural resource, the qualified archaeologist shall notify the City of said discovery, and shall conduct consultation with TCA tribe(s) to determine the most appropriate mitigation. The qualified archaeologist, in consultation with the City, the TCA Tribe and the Native American monitor(s), shall determine the significance of the discovered resource. Recommendations for the resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor(s) and be submitted to the City for review and approval.

TCR-7: The avoidance and/or preservation of significant cultural resources that qualify as historical, unique archaeological, and/or tribal cultural resources must first be considered and evaluated as required by CEQA. Where any significant resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor(s), and shall be subject to approval by the City. The archaeological monitor, in consultation with the Native American monitor(s), shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.

TCR-8: If the qualified archaeologist elects to collect any archaeological materials that qualify as tribal cultural resources, the Native American monitor(s) must be present during any testing or cataloging of those resources. Moreover, if the qualified archaeologist does not collect the archaeological materials that qualify as tribal cultural resources that are unearthed during the ground disturbing activities, the Native American monitor(s), may at their discretion, collect said resources and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. The project archaeologist shall document evidence that all cultural materials have been curated and/or repatriated as follows:

1.) It is the preference of the City that all tribal cultural resources be repatriated to the TCA Tribe as such preference would be the most culturally sensitive, appropriate, and dignified. Therefore, any tribal cultural resources collected by the qualified archaeologist shall be provided to the TCA Tribe. Evidence that all cultural materials collected have been repatriated shall be in the form of a letter from the TCA Tribe to whom the tribal cultural resources have been repatriated identifying that the archaeological materials have been received.

OR

2.) Any tribal cultural resources collected by the qualified archaeologist shall be curated with its associated records at a San Diego curation facility or a culturally-affiliated Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/ researchers for further study. The collection and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence that all cultural materials collected have been curated shall be in the form of a letter form the curation facility stating the prehistoric archaeological materials have been received and that all fees have been paid.

TCR-8: If the qualified archaeologist elects to collect any archaeological materials that qualify as tribal cultural resources, the Native American monitor(s) must be present during any testing or cataloging of those resources. Moreover, if the qualified archaeologist does not collect the archaeological materials that qualify as tribal cultural resources that are unearthed during the ground disturbing activities, the Native American monitor(s), may at their discretion, collect said resources and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. The project archaeologist shall document evidence that all cultural materials have been curated and/or repatriated through a signed curation agreement and/or collection transfer agreement. TCR-9: Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusion of the archaeological monitoring program and any data recovery program on the project site shall be submitted by the qualified archaeologist to the City. The Native American monitor(s) shall be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report will include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Archaeological Survey Report, Brian F Smith dated May 3, 2018.

As described under Section V, Cultural Resources, cultural resources report (BFSA, 2018) was prepared for the proposed residential development. The report concluded that mitigation monitoring would be necessary and will be conditioned. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. Therefore, with the implementation of the following mitigation measures TCR-1 through TCR-9 would reduce impacts to tribal cultural resources to less than a significant level.

XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Project Description

The proposed on-site sewer system for the residential development would include sewer lines within the proposed internal roadways. The internal system would connect to a line in Tyler Street. The project's incremental increase in demand for wastewater treatment would not exceed current City wastewater capacity based on the consistency of the proposed use with planned land uses that are considered in the City's wastewater capacity planning. The project is consistent with the General Plan; therefore, no additional wastewater treatment facilities are required. Impacts would be less than significant.

This project will be required to comply with the requirements of the City of Santee Engineering Design Standards, waste water discharge regulations and the California Plumbing Code as a condition of project approval. All wastewater would be treated consistent with applicable RWQCB treatment requirements. Because the City of Santee regulations regarding wastewater discharge are compliant with the Regional Water Quality Control Board waste water treatment requirements, this project will not have any significant impact.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Project Description

The project would result in an increase demand for water service. This increase in demand and water service can and would be provided to the proposed project by the Padre Dam Municipal Water District. In April 2021, the District issued a Water Availability letter stating that it has the facilities to serve the project and imposing certain conditions on the project, which the project must satisfy. which has water service in the area to serve the project. The water main

extension for the Project will be completed within existing Tyler Street roadway (i.e., no additional impacts). Because the proposed development is consistent with the General Plan, no additional entitlements or resources would be needed to service the project. This project will have a less than significant impact.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Project Description

The proposed project would include construction of on-site sewer lines to connect the proposed project site to the existing Padre Dam Municipal Water District sanitary sewer system. In April 2021, the District issued a Sewer Availability letter stating that it has adequate facilities to serve the project and imposing certain conditions on the project, which the project must satisfy. The proposed on-site sewer system for the residential development would include sewer lines within the proposed internal roadways. The internal system would connect to a line in Tyler Street. The project's incremental increase in demand for wastewater treatment would not exceed current Padre Dam MWD and City wastewater capacity based on the consistency of the proposed use with planned land uses that are considered in the Padre Dam MWD and City's wastewater capacity planning. The project is consistent with the General Plan; therefore, no additional wastewater treatment facilities are required. Impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Project Description

The project would comply with the City's construction and demolition recycling ordinance (Santee Municipal Code Section 13.38.060) and Solid Waste Ordinance # 339-A, which follows state regulations for solid waste and recycling. The City, including the subject project, is served by the Sycamore Landfill, which has a total remaining capacity of 113,972,637 cubic yards with an operation date into 2042 (Cal Recycle 2020). The project is consistent with its residential land use designation; therefore, the volume of solid waste anticipated is included in the long term waste projections for the City. The project would be served by a landfill with sufficient permitted capacity.

The project would comply with all applicable regulations related to solid waste. A less than significant impact would occur.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee General Plan, Project Description

The project would comply with the City's construction and demolition recycling ordinance (Santee Municipal Code Section 13.38.060) and Solid Waste Ordinance # 339-A, which follows state regulations for solid waste and recycling. The project would comply with all applicable regulations related to solid waste. No impact would occur.

XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☒ No Impact

Discussion:

Source(s): City of Santee General Plan, Project Description

The Project is adjacent to areas or lands classified as very high fire hazard severity zones and have incorporated Brush Management requirements that control the potential fuel load within 100 feet of the residential structures, or the equivalent with mitigation measures implemented, and 25 feet off of the paved road surface to allow for passable ingress and egress from the development. A minimum 100-foot-wide FMZ is required by the SFD (Santee Municipal Code Chapter 11.18.020, Section 4907.2, Title 14, and PRC 4290-4291) for defensible space in areas adjacent to naturally vegetated, open space lands. Based on the site plan, the majority the lots within the Project site achieve 100 feet or more of on-site FMZ, which includes a minimum 50-foot wide Zone 1 (irrigated and re-planted with SFD approved fire resistive, less flammable plant species) and a 50-foot wide Zone 2 (no more than 30% of native vegetation should remain within the square footage of the planted area). However, as stated above, conceptual building footprints partially protrude into the 100 feet FMZ along the northern, southeastern, and eastern boundaries, more specifically Lots 1 through 3, 7, and 8 are constrained to providing between 50 to 100 feet of achievable on-site fuel modification. The remaining on-site fuel modification is restricted in the north by an ephemeral drainage easement (adjacent to Lots 1 through 5) and to the southeast and east by the Project boundary and onsite OS easement (adjacent to Lots 7 and 8). With the development meeting the City standards, the Project will not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Project Description

The Project is adjacent to areas or lands classified as very high fire hazard severity zones and have incorporated Brush Management requirements that control the potential fuel load within 100 feet of the residential structures and 25 feet off of the paved road surface to allow for passable ingress and egress from the development. Due to the east facing steep up-slope leading away from the development, the prevailing winds, and other factors such as the construction of the homes (double glazed windows and boxed eaves) and the maintained Fuel Modification Zone (FMZ).

As a result, the Project will not exacerbate wildfire risks, and thereby would not unduly expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Less than significant impact.

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Source(s): City of Santee General Plan, Project Description

The Project will require the installation and maintenance of associated infrastructure (such as roads, brush management zones, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. These impacts, both temporary and ongoing impacts have been assessed and mitigation identified

in the biological resources section. All maintenance of the FMZ will be completed by the landscaping company identified by the to-be-created Home Owners Association (HOA) for the neighborhood.

The following are City and State fire and building code required measures for building in wildland urban interface areas.

1. The proposed Tyler Street 14-lot single-family residential subdivision achieves a minimum 50 feet of on-site FMZ for every lot, and Lots 6 and 9 through 14 achieve a full 100 feet of FMZ (50 feet irrigated Zone 1 and 50 feet of a thinned Zone 2). Lots 1 through 5, 7, and 8 are unable to achieve a full 100 feet of FMZ; these lots are able to achieve between 50 and 100 feet of FMZ and will be required to implement the code exceeding mitigation measures described below.

2. Each of the new single-family residential structures within the proposed Tyler Street 14-lot subdivision site will be code compliant, ignition resistive, and fully-sprinklered in compliance with applicable portions of the City of Santee Municipal Code, as well as with the 2019 edition of the California Building Code (CBC), Chapter 7A (or then current edition); 2019 edition of the California Fire Code (CFC), Chapter 49 (or then current edition); and 2019 edition of the California Residential Code (CRC), Section 237 (or then current edition), as adopted by the City;

3. All rooms and enclosed spaces within each of the new single-family residences, including within the garages, will be provided with an NFPA 13D fire sprinkler system with additional coverage. The NFPA 13D system is required:

    a. To be designed by a licensed fire protection engineer or SFD-approved sprinkler contractor.

    b. To provide fire inspector's test value five feet above grade. To install a fire sprinkler box in garage with wrench and three heads of each type used in design of fire sprinkler system;

    c. To provide sufficient water supply as determined by fire sprinkler hydraulic calculations, which may require increased meter and piping size. If fire flow is insufficient for the designed system, alternative options, such as a fire pump designed to boost fire flow, may be considered, to the approval of SFD. Alternative options will be submitted to SFD for approval before installation;

    d. Automatic or self-closing doors shall be installed and conform to the exterior door assembly standards addressed in CBC Chapter 7A, Section 704A.3.2.3;

4. A fire alarm system shall be installed in accordance with NFPA 72, Fire Protection Signaling System and SFD requirements, for monitoring the flow switch and inter-connection with the dwellings' smoke detectors. The fire alarm system will be supervised by a third-party alarm company. The system will be tested annually, or as needed, with test results provided to SFD;

5. Zone 1 requires a minimum 50 feet of irrigated landscape planted with drought-tolerant, fire resistive plants. No undesirable, highly flammable plant species shall be planted. The landscaping will be routinely maintained and will be watered by an automatic irrigation system that will maintain healthy vegetation with high moisture contents that would prevent ignition by embers from a wildfire;

6. The new residential design also provides an unimpeded, all-weather pathway (minimum three feet wide) on all sides of the residential structures for firefighter access around the entire perimeter of the structure;

The following code exceeding mitigation measures are being provided for nonconforming lots unable to achieve a full 100 feet of fuel modification (Lots 1 through 5, 7 and 8). These code exceeding mitigations were found to meet or exceed the code required 100 feet fuel modification zones through science and application and were accepted by numerous fire agencies throughout California:

1. To mitigate for the reduced FMZs on Lots 1 through 6, the Project's applicant will apply for a 1602 Permit, which is a Lake and Streambed Alteration Program by the CA Department of Fish and Wildlife that would allow for 30% thinning (Zone 2) of the dead and dying material or mowing non-native grasses to lower than 4-inches (if present) within these Drainage areas and by doing so, allowing Lots 3 through 6 to achieve a full 100 feet of fuel modification.

2. To allow for the FMZs on and adjacent to Lots 7 and 8, the Project's applicant obtained an easement from Prospect Hills II, LLC, which would allow the Project's HOA to conduct approximately 50 feet of offsite Zone 2 30% thinning of the dead material or mowing non-native grasses to lower than 4-inches (if present) in the northeastern portion of Lot 7. Additionally, in order to provide the remaining FMZ along the eastern sides of Lots 7 and 8 within the onsite 'Diegan Sage Scrub' easement areas, a mitigation program has been put in place by the Project's biologist that would allow for 30% thinning (Zone 2) of the dead and dying material or mowing non-native grasses to lower than 4-inches (if present) within this Diegan Sage Scrub easement area. Within the willow scrub Zone 2 BMZ maintenance area, because no live and/or native material is removed, impacts are not considered a significant biological impact. As a result, no compensatory mitigation is required for Zone 2 impacts within the Willow Scrub habitat (refer to Project's Biological Report for more information on mitigation).

3. Lots 1 through 8) will be required to be maintained as an extended irrigated Zone 1 FMZ landscape with drought-tolerant, fire resistive plants. The Zone 1 FMZ will extend up to the drainage channel adjacent to Lots 1 through 6 and up to the Diegan Sage Scrub easement areas adjacent to Lots 7 and 8. The extended irrigated Zone 1 landscape will include no undesirable, highly flammable plant species shall be planted, that will be routinely maintained and watered by an automatic irrigation system that will maintain healthy vegetation with high moisture contents that would prevent ignition by embers from a wildfire;

4. Because of property boundary constraints, Lots 1 through 3 are unable to achieve a full 100 feet of FMZ onsite. To mitigate for the reduced FMZ, a 6-foot high non-combustible CMU fire wall constructed along the rear lot line behind Lots 1 through 3 will be constructed. The fire wall will be installed to function as heat-deflecting walls.

5. In addition to the construction of a 6-foot-high CMU wall, the Project proposes to provide exterior glazing in windows (and sliding glass doors, garage doors, or decorative or leaded glass doors) facing the open space and naturally vegetated areas to be dual pane with both panes tempered glass to mitigate for the reduced FMZ within Lots 1 through 3. Dual pane, one pane tempered glass has been shown during testing and in after fire assessments to significantly decrease the risk of breakage and ember entry into structures. Therefore, requiring code-exceeding dual pane, both panes tempered is anticipated to be an important safety measure that provides enhanced structure protection and provides mitigation for reduced fuel modification zones and limited setbacks from adjacent structures. The window upgrade also exceeds the requirements of Chapter 7A of the CBC and providing additional protection for the structure's most vulnerable, exterior side (CODE EXCEEDING MITIGATION MEASURE);

6. wildland exposed sides of the structures on Lots 1 through 3 shall also include 5/8-inch Type X fire rated gypsum sheathing applied behind the exterior covering or cladding (stucco or exterior siding) on the exterior side of the framing, from the foundation to the roof for a facade facing the open space and naturally vegetated areas. 5/8-inch Type X fire rated gypsum sheathing is required to be manufactured in accordance with established ASTM standards defining type X wallboard sheathing as that which provides not less than one-hour fire resistance when tested in specified building assemblies and has been tested and certified as acceptable for use in a one-hour fire rated system. CertainTeed Type X Gypsum Board has a Flame Spread rating of 15 and Smoke Developed rating of 0, in accordance with ASTM E 84, (UL 723, UBC 8-1, NFPA 255, CAN/ULC-S102); UL classified for Fire Resistance (ANSL/UL 263; ASTM E119) and listed under UL File No. CKNX.R3660 (Certainteed, 2021). Please refer to the specification in Attachment 5_for a more detailed description of CertainTeed 5/8-inch Type X Fire Rated Gypsum sheathing (or similar product) CODE EXCEEDING MITIGATION MEASURE;

7. Areas requiring ventilation to the outside environment will require ember-resistant vents such as Brandguard, Vulcan, or O'Hagin brands. These vents exceed the code requirement of a minimum 1/16-inch not to exceed 1/8-inch openings. All vents used for this project will be approved by SFD. Please refer to the specification in Attachments 6 and 7 for a more detailed description of Brandguard, Vulcan, and O'Hagin ventilation brands. These use of these ember resistant vents are a CODE EXCEEDING MITIGATION MEASURE;

8. Non-combustible fencing shall be required to be installed for areas within Fire Hazard Severity Zones and/or Wildland Urban Interface Areas, including within five feet of every structure and along the side yards of each residence (Santee Municipal Code, Chapter 11.18.020, Section 4908.1). Dudek agrees with the requirements for avoiding wood/combustible fences on perimeter lots that abut unmaintained open space areas. However, the use of Kroy Vinyl Fencing (see Attachment 8 – Kroy Vinyl Fencing Fire Rating) or fire retardant treated lumber, such as Hoover's lumber product, are considered acceptable fencing materials to use for the proposed interior 6-foot high fencing (see Attachment 9 – OSFM Approved Hoover X);

9. No eave overhangs. By requiring no eaves instead of the code required boxed eaves, the structure eliminates the ability of capturing hot air and embers that may circulate under a boxed eave and instead allows the hot air to either

bounce off the side of the structure or fly over the structure entirely (CODE EXCEEDING MITIGATION MEASURE);

10. Annual FMZ Inspections. Yearly fuel modification maintenance shall be required by the Project's HOA and each individual property owner. The communities HOA as well as individual property owners, shall be responsible for obtaining an FMZ inspection and report from a qualified SFD-approved 3rd party inspector in May of each year certifying that vegetation management activities throughout the Project site and within each individual lot have been performed pursuant to this Fire letter. This includes verifying that wood bark and other combustible mulches shall not be used within the first 5 feet from the homes. See details regarding the fuel modification zone vegetation maintenance program below (CODE EXCEEDING MITIGATION MEASURE).

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

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Wildfires can greatly reduce the amount of vegetation from hillsides. Plant roots stabilize the soil and above-ground plant parts slow water, allowing it to percolate into the soil. Removal of surface vegetation resulting from a wildfire reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris. If hydrophobic conditions exist post-fire, the rate of surface water runoff is increased as water percolation into the soil is reduced (Moench and Fusaro 2012). The potential for surface runoff and debris flows therefore increases significantly for areas recently burned by large wildfires (Moench and Fusaro 2012).

Slope failures, mudflows, and landslides are common in areas where steep hillsides and embankments are present and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. However, as presented in Section 4.6, Geology and Soils, the proposed project site is not at risk of landslide or mudflow. Given the characteristics of the project site, post-fire conditions are not expected to increase risks associated with slope failures, mudflows, or landslides.

Increases in surface runoff and erosion are also possible in a post-fire environment where surface vegetation has been removed and steep slopes can increase runoff flow velocity. As presented in Section 4.9, Hydrology and Water Quality, the incorporation of stormwater treatment basins, as well as the relatively flat (graded pads) nature of the project site, would greatly reduce the potential for off-site erosion as compared to the project site's current condition. CAL FIRE mapping data also indicates no post-fire erosion threat potential for the project site or the immediate surrounding area (CAL FIRE 2009). Finally, the irrigated and maintained landscaping is not be expected to be burned (removed) entirely should a fire occur on the project site, unlike post-fire conditions in native vegetation where complete removal is common. Considering these project site features and characteristics, post-fire conditions are not expected to increase risks associated with runoff and erosion.

Considering the project site's terrain and proximity of hillsides, and with implementation of project grading, construction and erosion control BMPs, potential impacts associated with runoff, post-fire slope instability, or drainage changes are considered less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

☐ Potentially Significant Impact ☒ Less than Significant with Mitigation Incorporated

☐ Less Than Significant Impact ☐ No Impact

Discussion:

Potentially significant impacts to sensitive habitats were identified that would require mitigation as detailed in Section IV. a) and d). In addition, potentially significant impacts to unknown buried cultural resources and human remains were identified that would be mitigated through implementation of archaeological monitoring as discussed in Section V. b) and d).

However, no significant and unavoidable impacts were identified that would have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Project impacts would be less than significant with mitigation.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.)

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in Sections I. through XVII. of this form. In addition to evaluation of potential project-specific effects, this evaluation considered the project's potential for incremental effects that may be cumulatively considerable when viewed in connection with the effects of past, current, or probable future projects in the area.

Regarding cumulative aesthetics impacts, the scope for cumulative analysis of impacts related to aesthetics and views is the viewshed surrounding the project site. While development of the cumulative project sites would result in a cumulative change to the visual character of the immediate area, this change would not be considered adverse considering the proposed amenities and architectural interest that would be provided by the project. Cumulative projects would not be within the same visual environmental as the project, thus no cumulatively significant aesthetic impact would occur.

Regarding potential cumulative impacts from air quality, GHG emissions, and noise construction impacts, applicable regulatory requirements addressing noise levels, and air emissions during construction would ensure a cumulative impact would not occur. No cumulative operational noise impact would occur due to required compliance with property line noise limits.

There are no anticipated cumulative impacts to biological resources, because the project would fully mitigate its impacts to biological resources and none of the cumulative projects would have significant unavoidable impacts to biological resources. A majority of the cumulative projects are located in urban areas on disturbed lands that would not have the potential to contribute to a cumulative impact.

Regarding historic, archaeological, paleontological, and tribal cultural resources, a cumulative impact has not been identified for these issue areas because significant impacts to these resources associated with other cumulative projects would either not occur or would be mitigated as part of a discretionary permit process.

Regarding geology and soils impacts, these impacts are limited to localized impacts on each individual development. Because there are no potentially significant impacts identified for this project, the project does not contribute to any cumulative impacts.

No cumulative impact related to hydrology and water quality would occur, because individual developments would be required to prepare and comply with drainage studies and storm water management plans that would ensure significant drainage and storm water impacts would not occur and cumulative impacts would be avoided.

Because the project traffic generation falls below analyzed traffic volumes, no additional cumulative impacts would occur as a result of the project. No significant cumulative impact has been identified. Thus, cumulative impacts would be less than significant.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

☐ Potentially Significant Impact ☐ Less than Significant with Mitigation Incorporated

☒ Less Than Significant Impact ☐ No Impact

Discussion:

The project as designed adequately addresses public health and safety objectives identified in the General Plan and Municipal Code. No significant impact was identified that could result in an adverse impact to human beings. Therefore, the project would result in a less than significant effect on human beings either directly or indirectly.

Authority: Public Resources Code 21083, 21094.5.5
Reference: Public Resources Code Sections 21094.5 and 21094.5.5