~~DRAFT~~ FINAL

PROGRAM
ENVIRONMENTAL IMPACT REPORT

SUSTAINABLE SANTEE PLAN:

THE CITY'S ROADMAP TO GREENHOUSE GAS REDUCTIONS

CITY OF SANTEE

SAN DIEGO COUNTY, CALIFORNIA

LSA

~~August~~ December 2019

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SUSTAINABLE SANTEE PLAN:

THE CITY'S ROADMAP TO GREENHOUSE GAS REDUCTIONS

CITY OF SANTEE

SAN DIEGO COUNTY, CALIFORNIA

Submitted to:

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LSA

~~August~~ December 2019

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PREFACE

The draft Programmatic Environmental Impact Report ("PEIR") for the Sustainable Santee Plan was made available for public and agency review and comment from March 15, 2019 to April 29, 2019.

~~A total of nine (9) c~~ Comment letters were received from a variety of public agencies, interest groups, and private citizens during the review period. ~~Two a~~ Additional letters were received after the close of the review period. None of these comments introduced significant new information that would require a recirculation of the PEIR.

Where the Sustainable Santee Plan or the PEIR were changed to clarify, highlight, or expand points in response to comments, those changes are shown in a "strike out and underline format."

1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that local government agencies, before taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An Environmental Impact Report (EIR) is a public document designed to provide to the public and to local and State governmental agency decision-makers an analysis of potential environmental consequences to support informed decision-making.

This EIR has been prepared by the City of Santee (City) to analyze the potential environmental impacts of the proposed Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions ("Sustainable Santee Plan" or "proposed project"); to discuss alternatives; and to propose mitigation measures for identified potentially significant impacts that will minimize, offset, or otherwise reduce or avoid those environmental impacts.

This EIR has been prepared pursuant to the requirements of CEQA and the CEQA Guidelines. The City is the Lead Agency and, as such, has reviewed all submitted drafts, technical studies, and reports for consistency with applicable City regulations and policies and has commissioned the preparation of this EIR to reflect its own independent judgment. In compliance with and defined in CEQA Guidelines Section 15168, this EIR will serve as a Program EIR. A program EIR is one which may be prepared on a series of actions that can be characterized as long large project and are related either: 1) geographically; 2) a logical part in the chain of contemplated actions; 3) in connection with issuance of rules, regulations, or other criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects.

A program EIR can allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with problems or cumulative impacts. Subsequent activities within the program must be examined in light of the program EIR to determine whether an additional environmental document must be prepared.

Data for this EIR were obtained from review of adopted plans and policies; review of available studies, reports, and data; and specialized environmental assessments prepared for the proposed project (e.g., air quality).

1.2 SUMMARY OF PROJECT DESCRIPTION

The proposed project is adoption and implementation of the Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions ("Sustainable Santee Plan" or "proposed project"), prepared for the City of Santee, which is located within eastern San Diego County, approximately 20 miles due east of the Pacific Ocean and approximately 18 miles east of downtown San Diego. The City is bordered on the west and southwest by the City of San Diego and Marine Corps Air Station Miramar; on the south by the City of El Cajon; on the north by San Diego County; and on the east by unincorporated communities of Lakeside and Eucalyptus Hills. The City is approximately 16.5 square miles and supports a population of 57,000 residents. The City is currently only partially developed,

with approximately half its land undeveloped. The San Diego River flows through the central portion of the City. The major roadways that traverse the City are State Route (SR) 52, SR-125 and SR-67. Figure 1.1 shows the regional location of the City.

The proposed project is intended to provide policy direction and identify actions the City and community can take to significantly reduce the generation of GHGs consistent with California AB 32 and EO S-3-05. The purpose of the Sustainable Santee Plan is to guide the development, enhancement, and ultimately the implementation of actions and strategies that reduce the City's GHG emissions. Overall, in accordance with State regulations, the goal of the Sustainable Santee Plan is to reduce the City's communitywide GHG emissions 40 percent below 2005 emissions by 2030, and 49 percent below 2005 emissions by 2035. In addition, in compliance with the California Air Resources Board 2017 Scoping Plan Update, the City is aiming to reduce communitywide emissions below 3.8 metric tons CO_2e per capita by 2030. The Sustainable Santee Plan describes the baseline GHG emissions produced in the City and projects GHG emissions that could be expected if the Sustainable Santee Plan is not implemented.

Santee has revised the reduction measures in the Sustainable Santee Action Plan (SSP) to include the following, to be implemented in year 2020:

- Require energy audits for existing residential units seeking building permits for modifications, alterations and additions and implementation of energy efficiency retrofit recommendations. The energy reduction targets would be determined based on whether the permit covers a minor or major modification.

- Require energy audits for existing commercial units of 10,000 square feet or more or that seek building permits for modifications, alterations and additions and implementation of energy efficiency retrofit recommendations. The energy reduction targets would be determined based on whether the permit covers a minor or major modification.

- Require all new residential and commercial construction to meet California Green Building Standards Tier 2 voluntary measures.

- Require tree planting in parking lots and streetscapes with a goal of having tree shade on 14% of pavement during summer months by 2030 and 23% by 2035.

- Require enhanced cool roofs on commercial and municipal buildings.

- Construct active transportation routes (sidewalks and pedestrian paths) from Santee Light Rail Transit station to surrounding residential areas.

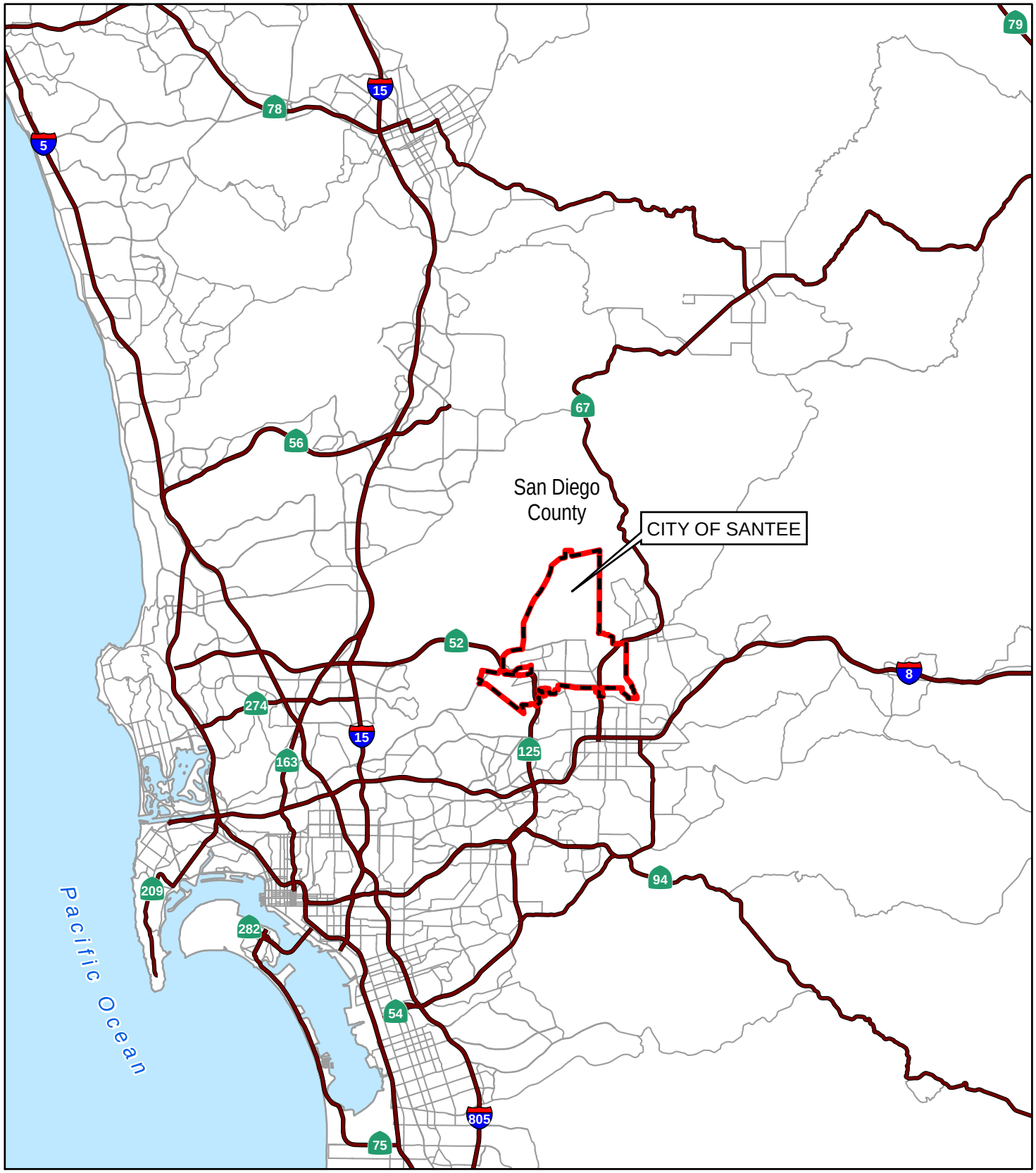
- Require commercial centers within 1/4 mile of the Santee Light Rail Transit station to reduce parking spaces by 10 percent from current zoning requirements.

- Expand bike routes to improve bike transit based on specific mile targets for each Class of bike lane, consistent with the City of Santee Bicycle Master Plan.

- Require new residential units to install electric vehicle chargers.
- Require replacement of traffic signals with Smart Signals, retime traffic signals, and install one round about.
- Require diversion of at least 70 percent of total solid waste generated in the City by 2030 and 80 percent by 2035, pursuant to the City's agreement with the solid waste collector.
- Require all new development to install photovoltaic solar systems, unless installation is infeasible due to poor solar resources established in a solar feasibility study submitted within an applicant's formal project submittal to City.
- Implement a Community Choice Aggregation program to provide 100 percent renewable energy by 2035.
- Install a minimum of one electric vehicle charging station within the public parking at City Hall within fiscal year 2020-2021.

To better distinguish between measures with actions that directly reduce GHG emissions from actions that educate or support emission reducing actions, the City has fine-tuned and separated out the supporting measures, which further the goals of the SSP but are not relied on to meet State reduction targets. The supporting measures are no longer combined with the reduction measures so the public can more easily distinguish them from the mandatory reduction measures.

- Initial supporting measures include designating a Sustainable Program Manager to oversee implementation of the SSP and establishing a City webpage dedicated to the SSP (e.g., providing information on financial incentives and programs for reducing energy use, ridesharing programs, and information for developers seeking to rely on the SSP). These must be implemented within 6 months of approval of the SSP.
- The supporting measures also include more robust efforts to be implemented on or before December 2020, such as establishing an online permitting system to facilitate upgrades to residences and businesses; updating the City's official street tree list to include more water efficient varieties; conducting a municipal energy audit; and conducting a study to evaluate the feasibility of installing electric vehicle charging stations on City property.
- The supporting measures will assist the City in keeping pace with the long term State goal in Executive Order B-55-18 of carbon neutrality by 2045 through further updates and amendments to the SSP, as required for it to serve as a qualified reduction plan under CEQA.



LSA

LEGEND

City Boundary

Sphere of Influence

Freeways and Highways

Roads

N

0 2.5 5

Miles

SOURCE: Esri (2015)

I:\SNT1701\GIS\MXD\ProjectLocation.mxd (11/6/2017)

FIGURE 1,1

Sustainable Santee Plan

Regional Location

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The proposed Sustainable Santee Plan consists of the following chapters and associated objectives:

1. ***Introduction:*** Description of climate change, sustainability, energy efficiency, and why the City is undertaking Sustainable Santee Plan development. Description of existing regulations and benefits of the Sustainable Santee Plan including increasing energy efficiency and reducing GHG emissions, CEQA streamlining and public health.
2. Energy and ***GHG Emissions Inventory, Forecast, and Targets:*** Summary of the City's historic and estimated future GHG emissions, and the reduction targets the City has established.
3. ***GHG Reduction Measures:*** Outline of the reduction goals and strategies that will be implemented to meet the reduction targets. Local co-benefits of each GHG reduction measure are also included.
4. ***Adaptation:*** Description of the potential regional impacts of climate change on the City and measures the City can take for adaptation to climatic changes.
5. ***Plan Implementation:*** Summary of the implementation of the GHG reduction measures, administration and/or staffing, potential funding sources, timelines for measure implementation, community outreach and education and how the Sustainable Santee Plan will be monitored and updated over time.

   Three appendices to the plan provide the methodology, data, and tools related to the Sustainable Santee Plan.

Specific project features are discussed further in Chapter 3.0, Project Description.

1.3 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *CEQA Guidelines* requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. As summarized in Table 1-A, no impacts are considered significant, adverse, and unavoidable after all mitigation is applied. These impacts are also described in detail in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures.

1.4 ALTERNATIVES

Section 21100 of the Public Resources Code and Section 15126.6 of the *CEQA Guidelines* require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the proposed project and that would avoid or substantially lessen any of the significant environmental impacts.

A brief description of the project alternatives is provided below. The alternatives are analyzed in detail in Chapter 5.0, Alternatives.

- ***Alternative 1:*** No Project/No Plan Alternative. CEQA Guidelines Section 15126.6(e)(3)(A) states that when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy, or

operation into the future. As the Sustainable Santee Plan does not propose development, but includes policies to facilitate sustainable development and guide land use decisions together with and as part of the General Plan, the "no project" alternative evaluates impacts that may occur without the sustainable policies and greenhouse gas reduction measures proposed within the Sustainable Santee Plan. This alternative assumes that the City would remain in the same condition as it was at the time the Notice of Preparation (NOP) was published (July 2017). The setting of the City at the time the NOP was published, is described throughout Chapter 4.0 of this EIR with respect to individual environmental issues, and forms the baseline of the impact assessment of the proposed plan. This alternative represents the environmental conditions that would exist if no Sustainable Santee Plan of any kind were to be adopted by the City. The existing practices would continue as they currently do in the foreseeable future.

- ***Alternative 2: Accelerated Reduction Program Alternative.*** During the scoping process, a few public comments requested an analysis of the Sustainable Santee Plan that accelerated the reduction of greenhouse gases to try and achieve a carbon-neutral goal for the City by 2030. To facilitate this analysis, the Accelerated Reduction Program Alternative was selected to evaluate how this alternative might avoid or lessen environmental impacts. Alternative 2 would include more aggressive GHG reduction goals than the proposed project. This alternative would accelerate implementation timeline of the State's 2050 goal in order to substantially reduce GHG emissions by 2030. The 2050 goal as described in Executive Order S-3-05 is to get statewide emissions 80 percent below 1990 levels by 2050. Because statewide emissions includes intra-state aviation and some unique industrial processes that will require continued emissions, implementing this goal at a citywide level will require zero emissions from all sectors (land-based transportation, energy, landfill, water, and land uses) within the City. Alternative 2 represents the environmental conditions that would occur if a zero emissions scenario by 2030 were to be adopted by the City.

The No Project/No Plan Alternative and Alternative 2 would not be environmentally superior to the proposed project on the basis of the minimization or avoidance of physical environmental impacts. With respect to GHG emissions, the No Project/No Plan Alternative would have potentially greater and possibly significant impacts. The Accelerated Reduction Program Alternative would have potentially significant impacts with respect to aesthetics. An accelerated GHG reduction program would require more and larger solar photo voltaic cells and more renewable energy devices than what is envisioned with the plan. Environmentally Superior Alternative would be the proposed project.

1.5 AREAS OF CONTROVERSY

Pursuant to *CEQA Guidelines* Section 15123, this EIR acknowledges the areas of controversy and issues to be resolved that are known to the City or were raised during the scoping process. Major issues and concerns raised during the scoping process include the following: (1) concerns regarding project-related impacts on Multiple Species Conservation Plan (MSCP) areas; and (2) concerns regarding potential impacts to Traditional Cultural Resources.

Please note that this is not an exhaustive list of areas of controversy, but rather key issues that were raised during the scoping process. The EIR addresses each of these areas of concern or controversy,

examines project-related and cumulative environmental impacts, identifies significant adverse environmental impacts, and proposes mitigation measures designed to reduce or eliminate potentially significant impacts. Appendix A includes the NOP and Initial Study (IS), as well as comments received in response to the NOP and IS circulated for the proposed project.

1.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1.A identifies the potential project environmental impacts, proposed mitigation measures, and level of significance after mitigation is incorporated into the proposed project. Environmental topics addressed in this EIR are Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, and Wildfire.

Refer to Section 2.0, Introduction, of this Draft EIR for a discussion of additional effects found not to be significant through the NOP process (i.e., Agricultural Resources, Cultural Resources, Geology/ Soils, Hydrology/Water Quality, Mineral Resources, Noise, Population/Housing, Public Services and Recreation, Transportation/Traffic, and Tribal Cultural Resources).

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Table 1.A: Summary of the Project Impacts, Mitigation Measures, and Level of Significance after Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.1: Aesthetics			
Threshold 4.1.3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	Less than Significant.	No mitigation is required.	Less than Significant.
Threshold 4.1.4: Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	Potentially Significant.	**MM 4.1-1.** All proposed energy-generating structures shall be constructed utilizing non-reflective materials to the maximum extent feasible. If a reflective material is used, appropriate shielding shall be placed or the structure relocated to reduce the amount of visible glare. The City shall review all discretionary projects prior to issuance of building permits to ensure that appropriate shielding and placement of such structures are included in design plans.	Less than Significant.
4.2: Air Quality			
Threshold 4.2.1: Would the project conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant.	No mitigation is required.	Less than Significant.
4.3: Biological Resources			
Threshold 4.3.6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	Less than Significant.	No mitigation is required.	Less than Significant.
4.4: Greenhouse Gas Emissions			
Threshold 4.4.2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant.	No mitigation is required.	Less than Significant.
4.5: Hazards and Hazardous Materials			
Threshold 4.5.5: Would the project result in a safety hazard for people residing or working in the project area?	Potentially Significant.	**MM 4.1-1.** All proposed energy-generating structures shall be constructed utilizing non-reflective materials to the maximum extent feasible. If a reflective material is used, appropriate shielding shall be placed or the structure relocated to reduce the amount of visible glare. The City shall review all discretionary projects prior to issuance of building permits to ensure that appropriate shielding and placement of such structures are included in design plans.	Less than Significant.

Table 1.A: Summary of the Project Impacts, Mitigation Measures, and Level of Significance after Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Threshold 4.5.8**:** Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Potentially Significant	**MM 4.5-1** Within two years of adoption of the Sustainable Santee Plan, the City of Santee shall update the Safety Element of the General Plan and include policies that will implement the climate change adaptation strategies found in Chapter 4 of the Sustainability Plan.	Less than significant
4.6: Land Use and Planning			
Threshold 4.6.2: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant.	No mitigation is required.	Less than Significant.
Threshold 4.6.3: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	Less than Significant.	No mitigation is required.	Less than Significant.
4.7: Wildfire			
Threshold 4.7.1**:** Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than Significant.	No mitigation is required.	Less than Significant.
Threshold 4.7.4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Less than Significant.	No mitigation is required.	Less than Significant.

2.0 INTRODUCTION

This Program Environmental Impact Report ("PEIR") has been prepared to evaluate environmental impacts associated with the proposed Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions ("Sustainable Santee Plan" or "proposed project") in the City of Santee (City). The City is the "public agency which has the principal responsibility for carrying out or approving the project" and, as such, is the "Lead Agency" for this project under the California Environmental Quality Act of 1970 (CEQA) (*CEQA Guidelines* Section 15367). CEQA requires the Lead Agency to consider the information contained in the PEIR prior to taking any discretionary action. This PEIR is intended to serve as an informational document to be considered by the City during deliberations on the proposed project. The Project approvals associated with the proposed project are described in Section 3.0, Project Description.

An Initial Study (IS), prepared by the City, indicated that the proposed project may have a significant effect on the environment and that an PEIR would be required to fully evaluate potential adverse environmental impacts that may result from implementation of the project. As a result, this Draft PEIR has been prepared in accordance with CEQA, as amended (Public Resources Code [PRC] Section 21000, et seq.), and the *State CEQA Guidelines for Implementation of CEQA* (California Code of Regulations [CCR], Title 14, Section 15000, et seq.). This PEIR also complies with the procedures established by the City for the implementation of CEQA.

2.1 PURPOSE AND TYPE OF EIR/INTENDED USES OF THE EIR

This Draft PEIR has been prepared to evaluate environmental impacts that may result from implementation of the proposed project. As the Lead Agency, the City is responsible for preparation of this PEIR and, after the comment/response process, certification of the Final Program Environmental Impact Report (FEIR) and is the authority to approve or disapprove the proposed project as described in this PEIR.

This PEIR is a program-level EIR pursuant to *CEQA Guidelines* Section 15168(a)(3), prepared in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program. This EIR has been prepared to analyze environmental impacts associated with implementation of the Sustainable Santee Plan and to also address appropriate and feasible mitigation measures or project alternatives that would minimize or eliminate these impacts. This document is intended to serve as an informational document. Additionally, this EIR would provide the primary source of environmental information for the Lead Agency to consider when exercising any permitting authority or approval power directly related to implementation of the proposed project.

This PEIR is intended to provide decision-makers and the public with information that enables them to consider the environmental consequences of the proposed action. This EIR identifies significant or potentially significant environmental effects, as well as ways in which those impacts can be reduced to less than-significant levels, whether through the imposition of mitigation measures or through the implementation of specific alternatives to the proposed project.

This Draft PEIR analyzes the proposed project under CEQA at a program level. The proposed project includes the adoption of the proposed Sustainable Santee Plan, which is intended to guide the City and future development in achieving sustainability by utilizing resources effectively and reducing greenhouse gas (GHG) emissions, as well as prepare for potential climate-related impacts through the implementation of goals, measures, actions, and strategies. This PEIR has been prepared as a Program EIR for the following reasons:

- The Sustainable Santee Plan would be implemented over a large geographic area, which is defined as the total area within the City limits (approximately 16.5 square miles).
- The Sustainable Santee Plan itself does not propose any specific, individual development project. It is a policy-level document that outlines an ongoing program to reduce citywide GHG levels.
- GHG analyses for future discretionary projects can be evaluated against the Sustainable Santee Plan, providing tiering opportunities to streamline future environmental review that is consistent with this Program EIR.

Because this PEIR analyzes the Sustainable Santee Plan at a program level, and no specific, individual development projects are, at this time, known, this programmatic analysis is based on an analysis of anticipated growth of the City of Santee.

2.1.1 Tiering and Analysis of Subsequent Projects

CEQA Guidelines Section 15183.5, Tiering and Streamlining the Analysis of GHG Emissions, was added to the *CEQA Guidelines* and describes the criteria needed in a greenhouse gas reduction plan that would allow for the tiering and streamlining of CEQA analysis for subsequent development projects. The following quote is from the *CEQA Guidelines*:

Section 15183.5. Tiering and Streamlining the Analysis of Greenhouse Gas Emissions.

(a) Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce greenhouse gas emissions. Later project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review. Project specific environmental documents may rely on an EIR containing a programmatic analysis of greenhouse gas emissions as provided in section 15152 (tiering), 15167 (staged EIRs) 15168 (program EIRs), 15175-15179.5 (Master EIRs), 15182 (EIRs Prepared for Specific Plans), and 15183 (EIRs Prepared for General Plans, Community Plans, or Zoning).

(b) **Plans for the Reduction of Greenhouse Gas Emissions.** Public agencies may choose to analyze and mitigate significant greenhouse gas emissions in a plan for the reduction of greenhouse gas emissions or similar document. A plan to reduce greenhouse gas emissions may be used in a cumulative impacts analysis as set forth below. Pursuant to Sections 15064(h)(3) and 15130(d), a lead agency 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 or mitigation program under specified circumstances.

(1) Plan Elements: A plan for the reduction of greenhouse gas emissions should:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and

(F) Be adopted in a public process following environmental review.

(2) **Use with Later Activities.** A plan for the reduction of greenhouse gas emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later projects. An environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. If there is substantial evidence that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the plan for the reduction of greenhouse gas emissions, an EIR must be prepared for the project.

Later activities in the program subject to CEQA review must be examined in light of this Program EIR to determine whether additional environmental documentation must be prepared. Specifically, as discretionary activities associated with implementation of and consistent with the Sustainable Santee Plan are proposed, the environmental impacts of implementing those activities will be compared against the analysis set forth in this Program EIR. To the extent that those impacts are within the scope of the Program EIR's comprehensive analysis, no further CEQA documentation would be required. If impacts of later activities are not within the scope of this Program EIR, however, or if individual projects require project-specific analysis of certain impacts, subsequent CEQA review would be required. For additional information, see Chapter 4.0, Existing Environmental Setting, Environmental Analysis Impacts, and Mitigation Measures, of this EIR.

2.2 PUBLIC REVIEW PROCESS

In compliance with the *CEQA Guidelines*, the City has taken steps to maximize opportunities for the public and public agencies to participate in the environmental review process. The City conducted the scoping process, issued a Notice of Preparation (NOP) and IS for the proposed project, and

determined that an EIR was required to evaluate the potentially significant environmental effects of the proposed project and related actions. Additionally, a public scoping session was conducted, as discussed below.

2.2.1 Notice of Preparation

On August 17, 2017, an NOP for the proposed project was distributed by the City via the California State Clearinghouse (SCH). The SCH issued a project number for the PEIR (SCH No. 2017081030). In accordance with *State CEQA Guidelines*, Section 15082, the NOP was circulated to the agencies and individuals who had requested notification for a period of 30 days (later extended to 46 days), during which time written comments were solicited pertaining to environmental issues/topics that the EIR should evaluate. Comments received regarding the NOP were used to identify additional analysis and potential impacts that could result from implementation of the proposed project. The City received 15 comment letters in response to the NOP. These comment letters are included in Appendix A of this Draft PEIR.

2.2.2 Scoping Meeting and Areas of Controversy

The City held a public scoping meeting on August 31, 2017, to present the proposed project and to solicit input from interested individuals regarding environmental issues that should be addressed in this PEIR. Members of the public attended the meeting. No agency representatives attended the meeting.

2.2.3 AB-52 Consultation

Pursuant to the California Public Resources Code Section 21080.3.1, subdivision (b) of CEQA, the City of Santee as Lead Agency initiated consultation with three California Native American tribes that had requested consultation under AB-52 on January 16, 2019. The City received no requests for consultation during the 30-day period provided for such requests.

2.2.4 Public Review Period

This Draft PEIR is being distributed to numerous public agencies and other interested parties for review and comment. The PEIR is also available at the following locations throughout the City and on the City's website.[1]

City of Santee
Office of the City Clerk
10601 Magnolia Avenue, Building #3
Santee, California 92071

City of Santee
Development Services Department
10601 Magnolia Avenue, Building #4
Santee, California 92071

[1] http://www.cityofsanteeca.gov/

Santee Public Library
9225 Carlton Hills Boulevard, Suite 17
Santee, California 92071

All comments received from agencies and individuals regarding the Draft PEIR will be accepted during the public review period, which will not be less than 45 days, in compliance with CEQA. All comments on the PEIR should be sent to the following City contact person:

John O'Donnell, Principal Planner
City of Santee, Development Services Department
10601 Magnolia Avenue, Building #4
Santee, California 92071
Phone: (619) 258-4100, Ext. 182
Email: jodonnell@CityofSanteeCa.gov

Review Period: March 15, 2019 through April 29, 2019

Following the close of the review period, the City will prepare responses to all comments and will compile these comments and responses into an FEIR. All responses to comments submitted on the PEIR by agencies will be provided to those agencies at least 10 days prior to final action on the project. The City will make findings regarding the extent and nature of the impacts as presented in the FEIR. The FEIR will need to be certified as complete by the City prior to making a decision to approve or deny the project. Public input is encouraged at all public hearings before the City.

2.3 SCOPE OF THIS EIR

As required by *State CEQA Guidelines* Section 15128, this PEIR must identify the effects of the proposed project determined not to be significant. The scoping process for this PEIR included the preparation of an IS. Per *State CEQA Guidelines* Section 15063, the City prepared an IS to determine whether the project could have a significant effect on the environment. The City determined that the proposed project may have a significant impact on the environment for the issues of Aesthetics, Air Quality, Biological Resources, Global Climate Change and Greenhous Gas Emissions, Hazards and Hazardous Materials, Wildfire Hazards, and Land Use and Planning and these issues are therefore discussed in Chapter 4.0 of this document.

In addition to identifying potentially significant impacts of the project that required additional study, the IS also identified effects determined not to be significant consistent with *State CEQA Guidelines* Section 15063(c)(3)(B). Impacts that were determined to be less than significant were discussed and evaluated in this PEIR in Appendix A, which includes the IS. The analysis determined that the proposed project would result in no impact or less than significant impact to Agricultural Resources, Cultural Resources, Geology/Soils, Hydrology/Water Quality, Mineral Resources, Noise, Population/Housing, Public Services and Recreation, Transportation/Traffic, and Tribal Cultural Resources. For this reason, potential impacts related to the resources listed above are discussed solely in Appendix A of this PEIR.

2.4 FORMAT OF THE EIR

Pursuant to *State CEQA Guidelines* Section 15120(c), this PEIR contains the information and analysis required by Sections 15122 through 15131. Each of the required elements is covered in one of the EIR chapters described below.

2.4.1 Chapter 1.0: Executive Summary

Chapter 1.0 contains the Executive Summary of the PEIR document, listing all significant project impacts, mitigation measures that have been recommended to reduce any significant impacts of the proposed project, and the level of significance of each impact following mitigation. The summary is presented in a matrix (tabular) format.

2.4.2 Chapter 2.0: Introduction

Chapter 2.0 contains a discussion of the purpose and intended use of the PEIR, background on project initiation and the NOP, and areas of controversy known to the Lead Agency, including issues raised by the public during its review on the NOP.

2.4.3 Chapter 3.0: Project Description

Chapter 3.0 includes a discussion of the project's objectives, characteristics, and relationship to land use plans.

2.4.4 Chapter 4.0: Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures

Chapter 4.0 includes an analysis of the project's environmental impacts. It is organized into the following topical sections: Aesthetics, Air Quality, Biological Resources, Global Climate Change and Greenhouse Gas Emissions, Hazards and Hazardous Materials, Wildfire Hazards, and Land Use/Planning. The environmental setting discussions describe the "existing conditions" of the environment in the City at the time the NOP was prepared and in the vicinity of the City as they pertain to the environmental issues being analyzed (Section 15125 of the *State CEQA Guidelines*).

The project impact discussions identify and focus on the significant environmental effects of the proposed project. The direct and indirect significant effects of the project on the environment are identified and described, giving due consideration to both the short-term and long-term effects, as necessary (Section 15126.2[a] of the *State CEQA Guidelines*).

Chapter 4.0 also includes within each environmental impact analyzed a discussion of the cumulative effects of the project when considered in combination with other projects, causing related impacts, as required by Section 15130 of the *State CEQA Guidelines*.

The discussions of mitigation measures identify and describe feasible measures that could minimize or lessen significant adverse impacts for each significant environmental effect identified in the EIR (Section 15126[e] of the *State CEQA Guidelines*). The level of significance before and after mitigation is reported in each section. Unavoidable adverse effects are identified where mitigation is not expected to reduce the effects to less than significant levels.

2.4.5 Chapter 5.0: Alternatives to the Proposed Project

In accordance with CEQA (Section 15126.6 of the *State CEQA Guidelines*), the alternatives discussion in Chapter 5.0 describes a reasonable range of alternatives that could feasibly attain the basic objectives of the project and are capable of eliminating any significant adverse environmental effects or reducing them to a less than significant level. The alternatives analyzed in Chapter 5.0 include Alternative 1: No Project/No Plan, and Alternative 2: Accelerated Reduction Program.

2.4.6 Chapter 6.0: Long-Term Implications of the Project

Chapter 6.0 includes CEQA-mandated discussions on the following topics as required by Section 15126 of the *State CEQA Guidelines*: (1) significant irreversible environmental changes that would result from implementation of the proposed project; (2) significant adverse environmental impacts for which either no mitigation or only partial mitigation is feasible, and (3) growth-inducing impacts of the proposed project.

2.4.7 Chapter 7.0: Mitigation Monitoring and Reporting Program

PRC Section 21081.6 requires that agencies adopt a mitigation monitoring and reporting program for any project for which findings have been made pursuant to PRC Section 21081. Chapter 7.0 provides a list of all proposed project mitigation measures, defines the parties responsible for implementation and review/approval, and identifies the timing for implementation of each control measure.

2.4.8 Chapter 8.0: List of Preparers, Chapter 9.0: References, and Chapter 10.0: Acronyms and Abbreviations

Chapters 8.0 and 9.0 provide the list of the EIR preparers and technical report authors, and other experts included in the preparation of the EIR; and the references used in this EIR, respectively. Chapter 10.0 provides definitions for acronyms and abbreviations used in the EIR.

2.5 INCORPORATION BY REFERENCE

As permitted in Section 15150 of the *State CEQA Guidelines*, an EIR may reference all or portions of another document that is a matter of public record or is generally available to the public. Information from the documents that have been incorporated by reference has been briefly summarized in the appropriate sections of this EIR, along with a description of how the public may obtain and review these documents. These documents include:

- City of Santee General Plan Elements (as amended); and
- City of Santee Municipal Code and other titles referenced herein

Documents that are incorporated by reference are available for review at the City of Santee, Development Services, located at the address provided above.

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3.0 PROJECT DESCRIPTION

This section describes the proposed *Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions* ("Sustainable Santee Plan" or "proposed project") that is evaluated in this EIR. A description of the proposed project's location, goals, objectives, and required approvals is provided.

3.1 PROPOSED PROJECT

The proposed project is the Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions. Although the Sustainable Santee Plan proposes measures, it does not propose any specific development. The proposed project would involve the adoption of citywide programmatic policy documents; future project-specific actions would be subject to further environmental review and the regulations contained in the adopted General Plan. As such, following approval of the proposed project by the Santee City Council, the future physical improvements associated with the Sustainable Santee Plan would be subject to further review on a project-specific basis. In other words, each future project would be subject to a project-level CEQA review at the time it is proposed for consideration by the City. Therefore, the impact analysis contained in this document addresses the potential environmental implications associated with the adoption of the Sustainable Santee Plan at a programmatic level, not for a project-specific development or for any specific proposal.

3.1.1 Project Location and Scope

The Sustainable Santee Plan encompasses the entirety of the City of Santee, which is located within eastern San Diego County, approximately 20 miles due east of the Pacific Ocean and approximately 18 miles east of downtown San Diego. The City is bordered on the west and southwest by the City of San Diego and Marine Corps Air Station Miramar; on the south by the City of El Cajon; on the north by San Diego County; and on the east by unincorporated communities of Lakeside and Eucalyptus Hills. The City is approximately 16.5 square miles and supports a population of 57,000 residents. The City is currently only partially developed, with approximately half its land undeveloped. The San Diego River flows through the central portion of the City. The major roadways that traverse the City are State Route (SR) 52, SR-125 and SR-67. Figure 3.1 shows the regional location of the City.

The proposed project provides policy direction and identifies actions the City and community can take to significantly reduce the generation of GHGs consistent with California AB 32 and EO S-3-05. The purpose of the Sustainable Santee Plan is to guide the development, enhancement, and ultimately the implementation of actions and strategies that reduce the City's GHG emissions. Overall, in accordance with State regulations, the goal of the Sustainable Santee Plan is to reduce the City's communitywide GHG emissions by 15 percent below 2005 emissions by 2020, 40 percent below 2005 emissions by 2030, and 49 percent below 2005 emissions by 2035. In addition, in compliance with the California Air Resources Board 2017 Scoping Plan Update, the City is aiming to reduce communitywide emissions below 3.8 metric tons CO_2e per capita by 2030. The Sustainable Santee Plan describes the baseline GHG emissions produced in the City and projects GHG emissions that could be expected if the Sustainable Santee Plan is not implemented.

Figure 3.1: Project Location

3.1.2 Project Purpose

The Sustainable Santee Plan has four primary purposes:

1. Present the City's plan for achieving sustainability by utilizing resources efficiently, reducing greenhouse gas emissions, and preparing for potential climate-related impacts.

2. Identify how the City will effectively implement this Sustainable Santee Plan by obtaining funding for program implementation and tracking and monitoring the progress of Plan implementation over time.

3. Allow streamlined CEQA compliance for new development by preparing an Environmental Impact Report for the Plan and developing ~~screening~~ tools that provide clear guidance to developers and other project proponents.

4. Maintain economic competitiveness within the region.

3.1.3 GHG Emissions Inventory, Forecast, and Targets

The Sustainable Santee Plan provides a summary of the City's historic and estimated future GHG emissions in order to understand the local context of GHG emissions, and determine the reduction targets appropriate for the City.

The first step in completing the Sustainable Santee Plan was to update the City's GHG emissions inventory. In 2015, the City completed the 2005, 2008, 2012 and 2013 emissions inventories for community-wide sectors. The results of the 2005 and 2013 inventories are shown in FIGURE 3.2. Sector-level emissions for 2005 and 2013 are also shown in TABLE 3.1.

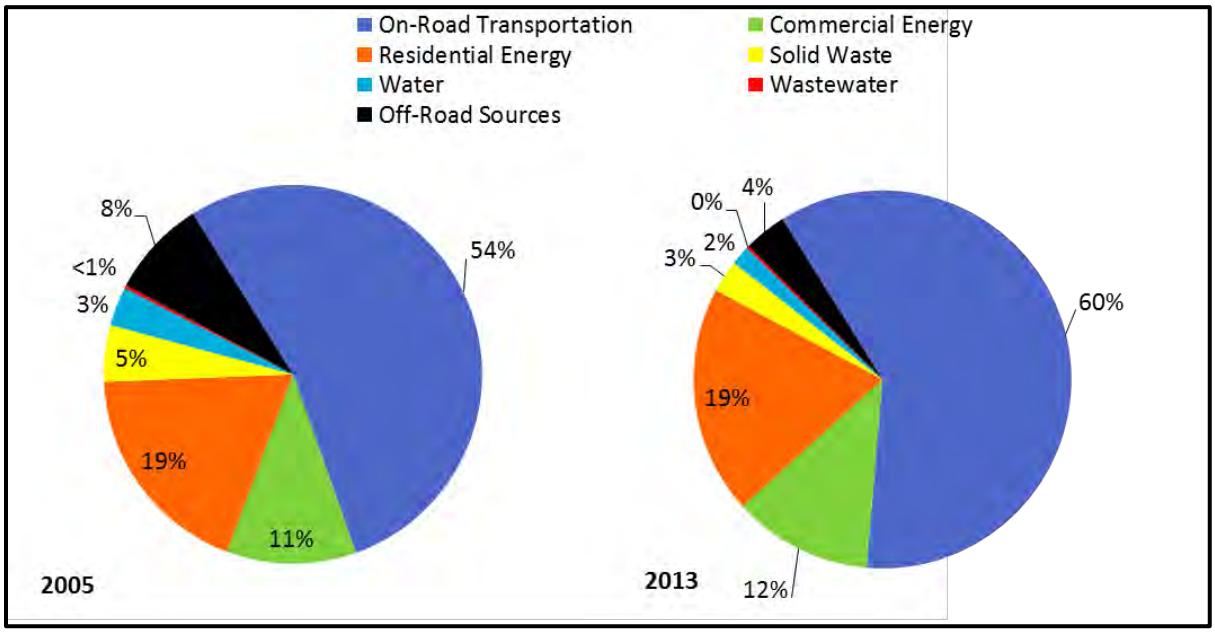


FIGURE 3.2 Community GHG Emissions by Sector for 2005 and 2013

TABLE 3.1 **Community-Wide GHG Emissions by Sector for 2005 and 2013**

Sector	2005 (MT CO_2e)	2013 (MT CO_2e)	% Change 2005–2013
On-Road Transportation	181,812	242,499	33.4%
Residential Energy	63,544	78,651	23.8%
Commercial Energy	37,697	48,025	27.4%
Solid Waste	16,376	11,151	-31.9%
Water	11,354	6,578	-42.1%
Off-Road Sources	28,230	14,699	-47.9%
Wastewater	959	971	1.3%
Total	339,972	402,574	18.4%

Similarly, the City's municipal operations were inventoried for 2005 and 2013. FIGURE 3.3 shows the municipal emissions. Municipal emissions are a subset of community emissions and account for less than 1 percent of community emissions. Sector-level details for 2005 and 2013 are shown in Figure 3.3 and Table 3.2.

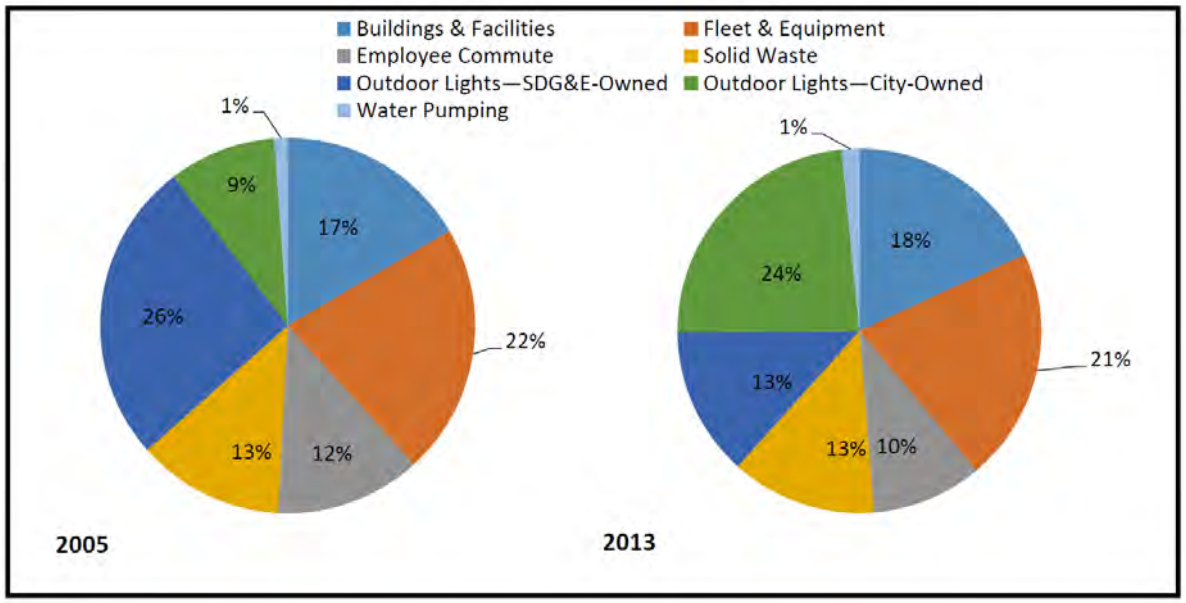


FIGURE 3.3 Municipal GHG Emissions by Sector for 2005 and 2013

TABLE 3.2 **Municipal GHG Emissions by Sector for 2005 and 2013**

Sector	2005 (MT CO_2e)	% of Total	2013 (MT CO_2e)	% of Total	% Change 2005–2013
Outdoor Lights–SDG&E-Owned	433	26%	252	13%	-42%
Fleet & Equipment	359	22%	396	21%	10%
Buildings & Facilities	275	17%	346	18%	10%
Solid Waste	210	13%	247	13%	18%
Employee Commute	208	13%	188	10%	-10%
Outdoor Lights–City-Owned	153	9%	450	24%	194%
Water Pumping	19.0	1%	30.0	2%	58%
Total	1,657		1,909		15%

3.1.4 GHG Emissions Forecasts

The City's future emissions were estimated using demographic indicators such as population and jobs growth. Emissions for the City's municipal operations were estimated using the number of staff anticipated in future years. Growth indicators used are shown by sector in TABLE 3.3.

TABLE 3.3 **Growth Indicators for 2013, 2020, and 2035**

Sector	Demographic Indicator	2013	2020	2035
Solid Waste, Water, Wastewater, Off-Road Sources	Service Population (Population + Jobs)	71,663	76,437	84,200
Population[1]	Population	55,033	59,488	63,518
Residential Energy	Households	19,725	20,995	24,165
Commercial/Industrial Energy	Jobs	16,630	16,949	20,682
Transportation[2]	VMT – Gas	458,785,827	493,494,150	576,966,520
	VMT – Diesel	27,822,637	32,536,348	45,500,895
Municipal Jobs (FTE)	Municipal Emissions[3]	112.8	115	120

SOURCE: SANDAG

FTE = Full-time equivalent employees

[1] Population data are shown for informational purposes but are not used for forecasting any sector.

[2] 2020 VMT is derived from the compound annual growth rate between 2013 and 2035.

[3] The number of jobs in the City is used as an indicator for all municipal operation emissions.

Future emissions estimates also included reductions that would happen with implementation of legislation adopted at the State level. That is, some level of emission reduction is anticipated within the City as a result of policies implemented at the State level, including:

- Low Carbon Fuel Standard
- Assembly Bill (AB) 1493 and Advanced Clean Cars
- California Building Code Title 24
- Renewable Portfolio Standard
- Senate Bill X7-7

The resulting projected emissions are considered an "adjusted" business-as-usual (Adjusted BAU) forecast. Historic emissions, and Adjusted BAU forecasts are shown in FIGURE 3.3 (community) and FIGURE 3.5 (municipal).

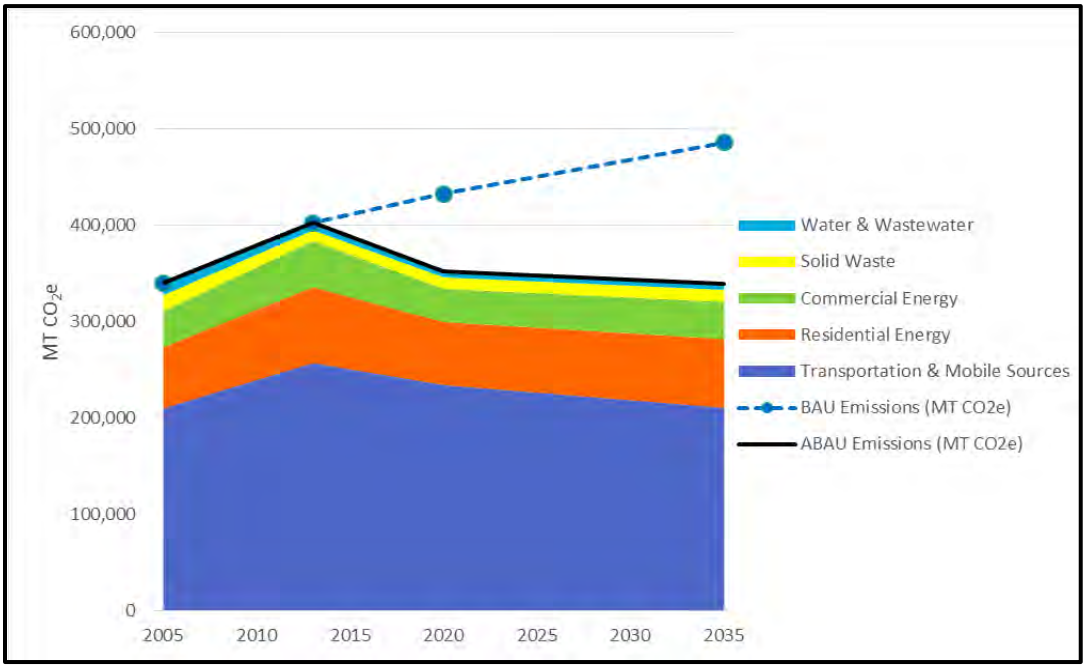


FIGURE 3.4 **Community BAU and ABAU Emissions Forecast**

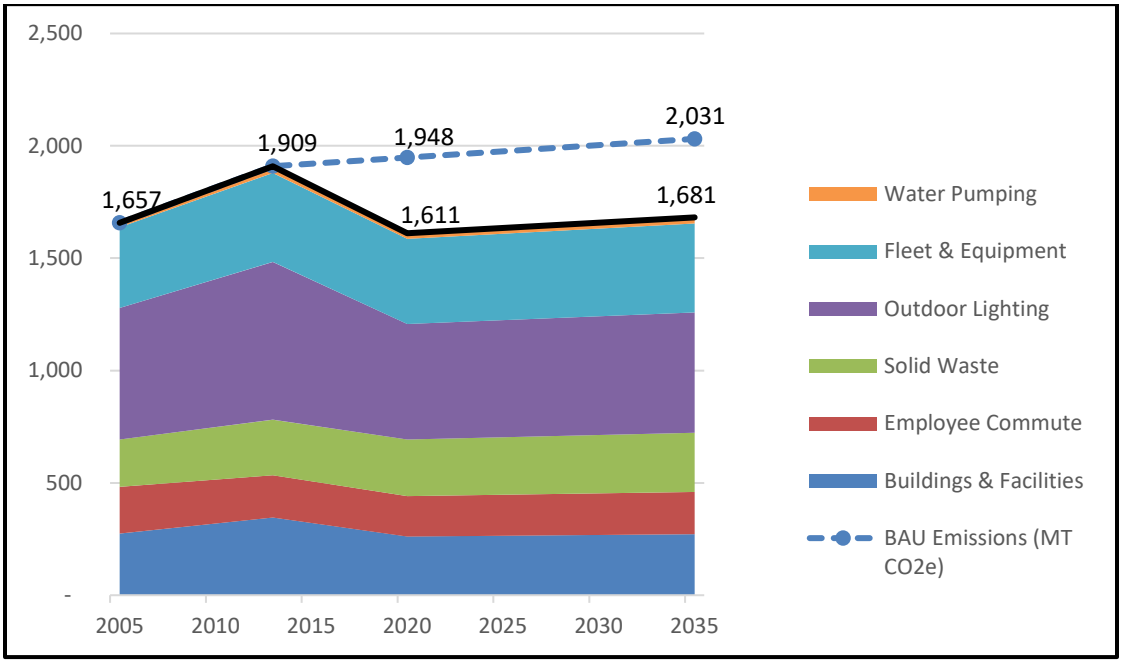


FIGURE 3.5 **Municipal BAU and ABAU Emissions Forecast**

3.1.5 GHG Emissions Targets

Consistent with the State's adopted ~~AB~~ SB 32 GHG reduction target, the City has set a goal to reduce emissions to 40 percent below 1990 levels~~ by the year 2020~~. This target was calculated as a 40~~15~~ percent decrease from 2005 levels, as recommended in the SA~~A~~B 32 Scoping Plan. ~~An interim goal for the City was created for 2030, which was to reduce emissions to 40 percent below 2005 levels~~. A longer-term goal was established for 2035, which was to reduce emissions to 49 percent below 2005 levels. The interim and longer-term goal would put the City on a path toward the State's ~~long-term~~ goal to achieve net carbon neutrality by 2045.~~reduce emissions 80 percent below 1990 levels by 2050~~ (TABLE 3.4).

TABLE 3.4 **Mass GHG Reduction Targets for Community Emissions**

	Community Target
~~2020 Target~~	~~15% below 2005 levels~~
~~2020 Emissions Goal (MT CO_2e)~~	~~288,976~~
2030 Target	40% below 2005 levels
2030 Emissions Goal (MT CO_2e)	~~203,983~~ 249,596
2035 Target	49% below 2005 levels
2035 Emissions Goal (MT CO_2e)	173,386

Notes and Acronyms:
MT CO_2e = Metric tons of carbon dioxide equivalent

FIGURE 3.6 shows how the Mass Emissions Reduction Targets for the City of Santee community emissions aligns with the statewide goals of reducing GHG emissions.

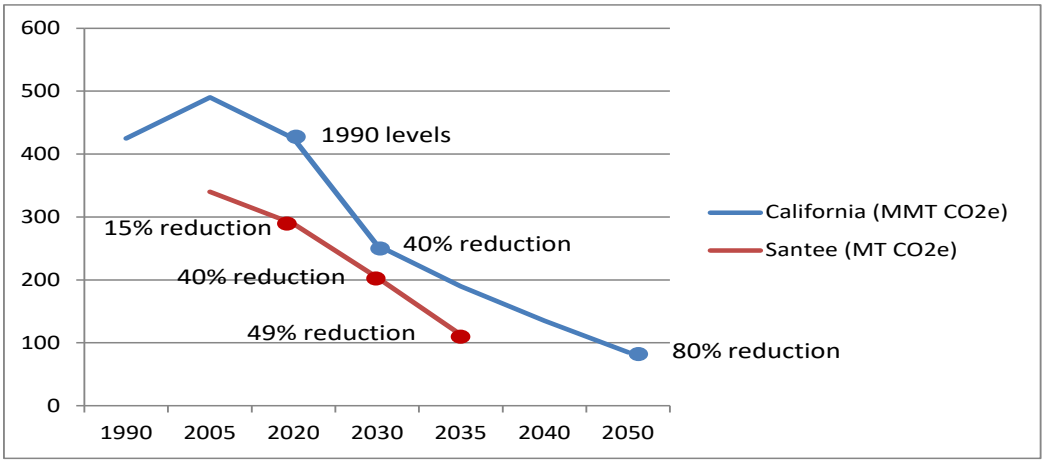


FIGURE 3.6 **Comparison of State Reduction Targets with Santee Reduction Targets**

Achievement of these reduction targets is a combination of reductions induced by State policies along with reductions to be generated by City actions. This is shown graphically in Figure 3.7 and Table 3.5.

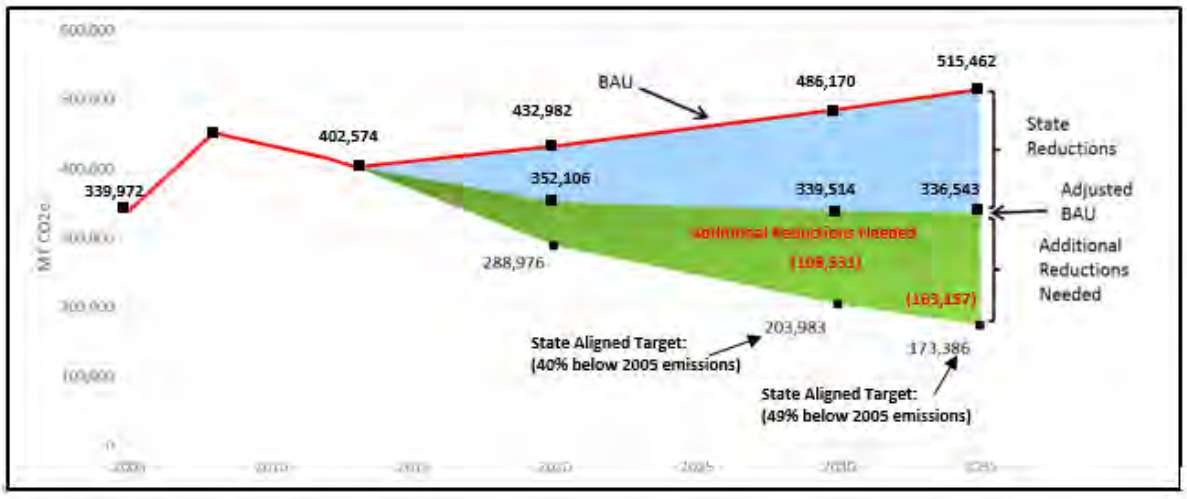


FIGURE 3.7 **Community BAU and ABAU Emissions Forecasts and Targets**

Per Capita Emissions Targets

The 2017 Scoping Plan Update recommends local plan level GHG emissions reduction goals of no more than 6 metric tons CO_2e per capita by 2030 and n~~o~~ 2 metric tons carbon dioxide equivalent (CO_2e) per capita by 2050. These goals consider all statewide emission sources; however, some of the emission sources are not included in the City's GHG inventories, such as industrial and aviation, and the City has no control over these emissions. By comparing the statewide most recent year (2015) GHG inventory and the City's 2013 inventory, it was determined that the City had control over 63 percent of total statewide emission source types. Therefore, the state-aligned emissions goals were proportioned to 3.8 MT CO_2e per capita by 2030, and 1.27 MT CO_2e per capita

by 2050. The ~~2020 and~~ 2035 goals were interpolated from the 2030 and 204550 goals, assuming same rate of reduction of the emission goals each year (TABLE 3.6).

TABLE 3.5 **State-Aligned GHG Reduction Targets for Community Emissions**

Sector	2005	2013	~~2020~~	2030	2035
BAU Emissions (MT CO_2e)	339,972	402,574	~~432,982~~	486,170	515,462
Adjusted BAU Mass Emissions (MT CO_2e)	339,972	402,574	~~352,106~~	339,514	336,543
Service Population (Population + Jobs)	70,152	71,663	~~76,437~~	81,499	84,200
Adjusted BAU Per Capita Emissions (MT CO_2e/SP)			~~4.61~~	4.17	4.00
State-Aligned Performance Target (% change from 2005)			~~-15%~~	-40%	-49%
State-Aligned Performance Target (MT CO_2e)			~~288,976~~	203,983	173,386
Reductions from Adjusted BAU needed to meet the Performance Target (MT CO_2e)			~~63,130~~	~~108,531~~ 135,531	163,157
State-Aligned Efficiency Target (MT CO_2e/SP)			~~5.06~~	3.80	3.16
Reductions from Adjusted BAU needed to meet the Efficiency Target (MT CO_2e/SP)			~~Target Met~~	29,816	70,471

Notes and Acronyms:
MT CO_2e = Metric tons of carbon dioxide equivalent
SP = service population = population + jobs

TABLE 3.6 **Per Capita GHG Reduction Targets for Community Emissions**

	Community Target
~~2020 State Target (MT CO_2e/SP)~~	~~8~~
~~2020 Emissions Goal (MT CO_2e/SP)~~	~~5.06~~
2030 State Target (MT CO_2e/SP)	6
2030 Emissions Goal (MT CO_2e/SP)	3.80
2035 State Target (MT CO_2e/SP)	5
2035 Emissions Goal (MT CO_2e/SP)	3.16

Notes and Acronyms:
MT CO_2e = Metric tons of carbon dioxide equivalent per capita
SP = Service Population

3.1.6 GHG Reduction Measures

The Sustainable Santee Plan details how the City will meet its GHG reduction targets by using goals, measures, and actions at the community and municipal levels. Community Measures are reduction measures to be implemented by the City to reduce its community GHG emissions associated with electricity, natural gas, water, transportation, solid waste, and new development. Municipal Measures are reduction measures to be implemented by the City to further reduce its GHG emissions associated with energy consumption, water use, and transportation. Since City operations

make up a small percentage of the total communitywide GHG emissions, the majority of the GHG reductions would result from the measures that are applied to the communitywide energy usage.

In addition to GHG reduction measures, the Sustainable Santee Plan also provides both GHG reduction measures and supportive measures that have no direct GHG reduction, but are able to boost other GHG reduction measures by increasing the participation levels. The City has separated the supporting measures from the required measures with quantified reductions in the Sustainable Santee Plan. For example, ~~Measure 1.1:~~ Energy Efficiency Training, Education, and Recognition in the Residential Sector has been identified as a Supporting Measure ~~is a measure~~ that provides education to inform people of the behavioral and technological changes that can increase energy efficiency. The Sustainable Santee Plan shows all the Supporting Measures at the end of Chapter 3.

As previously discussed, GHG reduction strategies involve the combined effort of State and City actions. State actions alone are not sufficient to achieve State targets in the years 2030 and 2035. Additional local reductions will be needed. Quantified community and municipal reduction strategies are listed in Tables 3.7 and 3.8 respectively.

TABLE 3.7 **Summary of Community GHG Reduction Strategies and Emission Reductions**

Goals and Measures	2030 Emission Reductions ($MT CO_2e$)	2035 Emission Reductions ($MT CO_2e$)
Goal 1: Increase Energy Efficiency in Existing Residential Units		
1.1: Energy Audits in the Existing Residential Sector		
Permits for Minor Modifications	45	45
Permits for Major Modifications	7,811	7,811
Goal 2: Increase Energy Efficiency in New Residential Units		
2.1: Exceed Energy Efficiency Standards	13,534	17,750
Goal 3: Increase Energy Efficiency in Existing Commercial Units		
3.1: Energy Audis in the Existing Commercial Sector		
Permits for Minor Modifications	660	660
Permits for Major Modifications	8,010	8,010
Goal 4: Increase Energy Efficiency in New Commercial Units		
4.1: Exceed Energy Efficiency Standards	8,705	12,337
Goal 5: Decrease Energy Demand through Reducing Urban Heat Island Effect		
5.1: Tree Planting for Shading and Energy Efficiency	47	22
5.2: Light-reflecting Surfaces for Energy Efficiency	1	1
Goal 6: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled		
6.1: Non-Motorized Transportation Options	315	263
6.2: Implement Bicycle Master Plan to Expand Bike Routes in the City	311	259
Goal 7: Increase Use of Electric Vehicles		
7.1: Electric Vehicle Charger Program	21,723	47,414
Goal 8: Improve Traffic Flow		
8.1: Traffic Flow Improvement Program	2,430	2,130
Goal 9: Decrease Greenhouse Gas Emissions through Reducing Solid Waste Generation		
9.1: Reduce Waste to Landfills	7,233	8,238
Goal 10: Decrease Greenhouse Gas Emissions through Increasing Clean Energy Use		
10.1: Increase Distributed Renewable Energy within Santee	1,800	2,783
10.2: Community Choice Aggregation Program[1]	46,322	56,932
Total Community Measures		
Total of All Measures Excluding CCA	72,615	107,723
Total of All Measures Including CCA	118,937	164,655

[1] CCA is separated from total of other reduction measures.
BAU = Business as Usual
CCA = Community Choice Aggregation
MT CO_2e = metric tons of carbon dioxide equivalent
SB = Senate Bill

Goals and Measures	2020 Emission Reductions (MT CO_2e)	2030 Emission Reductions (MT CO_2e)	2035 Emission Reductions (MT CO_2e)
Goal 1: Increase Energy Efficiency in Existing Residential Units			
1.1: Energy Efficiency Education and Best Practices	Supporting Measure		
1.2: Increase Community Participation in Existing Energy Efficiency Opportunities	45	45	45
1.3: Home Energy Evaluations	Supporting Measure		
1.4: Residential Home Energy Renovations	7,811	7,811	7,811
Goal 2: Increase Energy Efficiency in New Residential Units			
2.1: Exceed Energy Efficiency Standards	5,102	13,534	17,750
Goal 3: Increase Energy Efficiency in Existing Commercial Units			
3.1: Energy Efficiency Training, Education, and Recognition in the Commercial Sector	Supporting Measure		
3.2: Increase Business Participation in Existing Energy Efficiency Programs	660	660	660
3.3: Non-Residential Energy Audits	Supporting Measure		
3.4: Non-Residential Retrofits	8,010	8,010	8,010
Goal 4: Increase Energy Efficiency in New Commercial Units			
4.1: Exceed Energy Efficiency Standards	1,442	8,705	12,337
Goal 5: Increase Energy Efficiency through Water Efficiency			
5.1: Water Efficiency through Enhanced Implementation of SB X7-7	1,279	1,366	1,409
5.2: Exceed Water Efficiency Standards	22	24	25
Goal 6: Decrease Energy Demand through Reducing Urban Heat Island Effect			
6.1: Tree Planting for Shading and Energy Efficiency	330	352	363

Table 3.7 (Continued) Goals and Measures	2020 Emission Reductions (MT CO_2e)	2030 Emission Reductions (MT CO_2e)	2035 Emission Reductions (MT CO_2e)
6.2: Light-reflecting Surfaces for Energy Efficiency	4	4	4
6.3: Carbon Sequestration through Preservation of Natural Lands	Supporting Measure		
Goal 7: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled			
7.1: Non-Motorized Transportation Options	438	395	373
7.2: Implement Bicycle Master Plan to Expand Bike Routes around the City	14,788	13,329	12,600
7.3: Ride Sharing Programs within Businesses	19,761	17,812	16,838

7.4: Electrify the Fleet	3,341	21,723	47,414
7.5: Complete Streets and Safe Routes to Schools Programs	5,477	4,937	4,667
7.6: Reduce Vehicle Trips To/From School	16,431	14,811	14,000
Goal 8: Decrease Greenhouse Gas Emissions through Reducing Solid Waste Generation			
8.1: Reduce Waste to Landfills	7,233	7,9038,974	8,238
Goal 9: Decrease Greenhouse Gas Emissions through Increasing Clean Energy Use			
9.1: Clean Energy	Supporting Measure		
9.2: Community Choice Aggregation Program[1]	38,701	46,322	50,132
Goal 10: Decrease GHG Emissions from New Development through Performance Standards			
10.1: Screening Tables	393	1,003	1,308
Total Community Measures			
Total of All Measures Excluding CCA	92,569	133,135	155,605
Total of All Measures Including CCA	131,270	179,456	203,549

[1] CCA is separated from total of other reduction measures.
BAU = Business as Usual
CCA = Community Choice Aggregation
MT CO_2e = metric tons of carbon dioxide equivalent
SB = Senate Bill

As shown in Table 3.9 below, the projected emission reductions from all measures, other than CCA, would have the City of Santee meeting the GHG reduction targets in 2030 but not 2035. The 2035 GHG reduction target could be met in 2035 with the implementation of a CCA.

TABLE 3.9 **Community Emissions and Targets Comparison**

	2005 MT CO_2e	2020 MT CO_2e	2030 MT CO_2e	2035 MT CO_2e
BAU Emissions	402,574	432,982	486,170	515,462
Reduction Target	--	~~288,976~~	249,596	173,386
State and Federal Reductions	--	80,876	146,656	178,919
Local Measures Reductions Excluding CCA	--	~~92,569~~	72,615 ~~133,135~~	107,723 ~~155,605~~
Total Adjusted Emissions Without CCA	--	~~259,537~~	266,899 ~~206,379~~	228,820 ~~183,125~~
Additional Reductions Needed	--	~~Target Met~~	17,303 ~~Target Met~~	55,434 ~~9,739~~
CCA Reductions	--	~~38,701~~	46,322	56,932 ~~50,132~~
Total Adjusted Emissions With CCA	--	~~220,836~~	220,577 ~~160,057~~	171,888 ~~132,993~~
Additional Reductions Needed	--	~~Target Met~~	Target Met	Target Met

Notes and Acronyms:
BAU = Business as Usual
CCA = Community Choice Aggregation
MT CO_2e = metric tons of carbon dioxide equivalent

3.1.7 Adaptation

Studies show that California will experience warmer temperatures, increased drought, and more extreme weather events.[1] The impacts to the city will be similar.

The City may expect:

- **Increased temperatures**—By the end of this century, the average United States temperatures are predicted to increase by 3 °F to 12 °F, depending upon the amount of future emissions and how the earth responds to those emissions.[2] For California, the average annual temperature is expected to rise by 2.7 °F by 2050 and 4.1 to 8.6 °F by the

[1] California Natural Resources Agency and California Energy Commission, *Our Changing Climate 2012: Vulnerability & Adaptation to the Increasing Risks from Climate Change in California.* CEC-500-2012-007. July 2012.

[2] U.S. Global Change Research Program. 2014. Melillo, Jerry M., Terese (T.C.) Richmond, and Gary W. Yohe, Eds., 2014: *Climate Change Impacts in the United States: The Third National Climate Assessment*.

end of the century.[3] For the city, average temperatures are expected to increase between about 5 °F and 10 °F by the end of the century, depending on the emission scenario.[4]

- **Variable precipitation**— Globally, future precipitation is highly variable, and California is no exception. Annual precipitation in California is expected to increase by more than 12 percent through the end of the 21st century. Most of this increase is expected in Northern and Central California; precipitation in Southern California is expected to decrease by 3.3 percent. All regions of California are expected experience wetter winters, with Southern California rain increasing by 11 percent during the rainy months of December, January, and February.[5]
- **Increase in extreme weather events**—The historical number of extreme heat days (days over 99.9 °F) has been about four in Santee. By 2050, the number of extreme heat days in the city could increase to more than 12 per year, and by the end of the century, the number of extreme heat days could exceed 40 per year. In addition the length of extremely hot days will increase. Historically, the maximum duration of heat waves in the city has been four, but may increase to 10 by mid-century and 20 to 45 by the end of the century.

The Sustainable Santee Plan includes strategies for preparing Santee for changes in climate. These strategies are classified into six (6) categories:

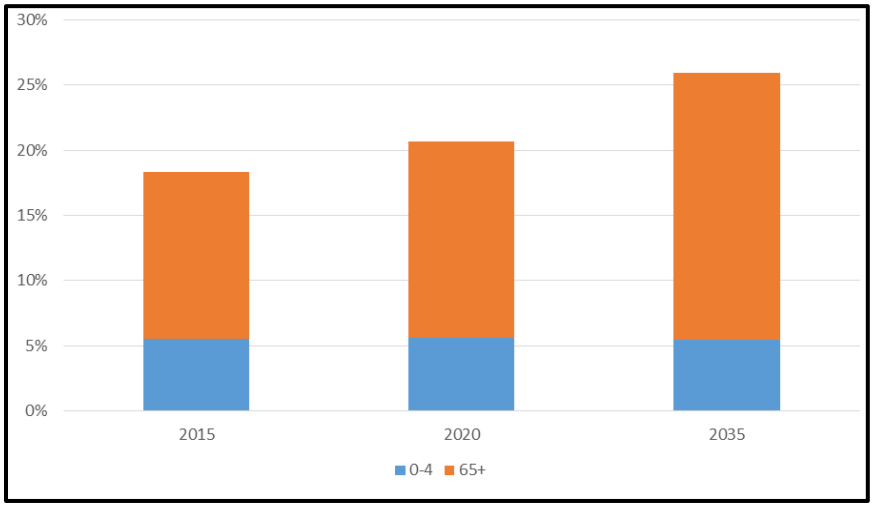
Public Health and Safety: Periods of increased high temperatures or extended high temperatures can lead to increased heat-related, cardiovascular-related, and respiratory illnesses and diseases, and other health impacts. Emergency medical services and hospital visits also increase during heat waves. Changes in temperature are also expected to worsen air quality by increasing ozone and particulate matter concentrations, which can cause or exacerbate respiratory symptoms such as asthma attacks. The City recognizes that climate change will not impact all populations equally. Especially sensitive populations include the young (under 5 years of age) and the elderly (over 65), which constitute 19 percent of the 2015 population and will increase to more than 35 percent of the population by 2035 (FIGURE 3.9). Other populations that could be affected by extreme temperatures include outdoor workers such as construction and maintenance employees. This places limits on work hours and may require additional training for workers to expand their understanding of heat-related illnesses. Adaptation strategies in the Sustainable Santee Plan are:

- Map neighborhoods that could be more vulnerable to the effects of climate change, such as flooding, fire, and the urban heat island effect is important in identifying high risk areas of the City.
- Create cooling centers at public spaces, such as libraries, for populations without air conditioning.
- Implement cooling technologies such as cool roofs and cool pavements.
- Strategically place shade trees near buildings, in parking lots, and along bike and pedestrian pathways.

[3] California Natural Resources Agency and California Energy Commission. 2012. *Our Changing Climate 2012: Vulnerability & Adaptation to the Increasing Risks from Climate Change in California.* CEC-500-2012-007. July.

[4] Scripps Institution of Oceanography. 2017. Projected Temperatures Data Set (2017). Website: http://cal-adapt.org/tools/annual-averages/#climatevar=tasmax&scenario=rcp85&lat=32.84375&lng=-.

[5] Allen, Robert J., and Rainer Luptowitz. 2017. "El Niño-like Teleconnection Increases California Precipitation in Response to Warming." Nature Communications 8 (July): 16055. doi:10.1038/ncomms16055.



SOURCE: SANDAG Data Warehouse

FIGURE 3.8 **Percentage of Santee's Population Considered Sensitive**

Electrical Demand: In addition to the health and public safety risks, the City may face challenges to its energy supply due to warmer temperatures. Peak demand for electricity may increase due to the increased use of air conditioners in the City and other regions of SDG&E territory, which may cause brownouts or blackouts. Additionally, efficiencies of electricity generation and transmission decrease as air temperatures increase, which further inhibit the ability of electric providers to meet increased demand. Adaptation strategies in the Sustainable Santee Plan are:

- Educate the public to become more energy efficient and reduce demand.
- Solar-based or other renewable energy sources to supplement the grid and to reduce peak demand on the grid.
- Improve building envelopes by adding insulation and placing trees to provide shade.
- Encourage cooling technologies.
- Increase the use of smart-meter devices to allow appliances to run on off-peak hours.

Water Availability: Water availability is and has been a vital economic, natural resource, and public health issue in California. Governor Jerry Brown declared a drought State of Emergency in January 2015 and the State Water Resources Control Board (SWRCB) announced in March 2015 water suppliers were encouraged to go beyond the minimum requirements to safeguard remaining water supplies. In April 2015, the Governor issued Executive Order B-29-15 that directs the SWRCB to implement mandatory water reductions to reduce water usage by 25 percent. Multiyear droughts decrease water supplies, while population growth exacerbates the problem by increasing demand. Supply limitations will only intensify as climate change causes reduced rainfall and increased temperatures. The San Diego County Water Authority, the wholesale supplier to San Diego County, expects demand to increase 22 percent between 2009 and 2035.[6] Adaptation strategies in the Sustainable Santee Plan are:

[6] San Diego County Water Authority. 2014. *San Diego County Water Authority Climate Action Plan*. p. 28. March.

- Educate the public about water conservation.
- Encourage low-impact development.
- Expand water recycling and grey-water systems.
- Promote sub-metering in multifamily housing units.
- Promote conversion of turf grass to xeriscaping

Infrastructure Damage: Cities, including Santee, rely on infrastructure for commuting, working, and other basic services. Roadways and buildings are built for long-term use; however, infrastructure is also susceptible to the impacts of climate change as it is generally built to meet historic climate conditions. Therefore, infrastructure is also vulnerable to climate change impacts. Much of the roadways and railways are dark or metal-based, conducting heat and raising temperatures well beyond the observed air temperature. Increased temperatures can cause pavement to soften and to expand, causing potholes. Railways can buckle under extreme heat, requiring trains to go slower to navigate the buckle or stop service for repairs. Flooding can also shorten the life of roadway infrastructure, require more maintenance, and cause traffic delays. Building infrastructure likewise may have shortened lifetimes due to flooding. Adaptation strategies in the Sustainable Santee Plan are:

- Evaluate infrastructure vulnerability based on current degradation and expected climate-related impacts.
- Prioritize and plan for infrastructure improvements.
- Identify alternative routes where infrastructure damage may occur.

Wildfire: Because California is expected to experience increased temperatures and reduced precipitation, there will likely be more frequent and intense wildfires and longer fire seasons. About one-third of the City of Santee is covered by open space, which is the type of land most vulnerable to wildfire. Effects from wildfire can include eye and respiratory illness, worsening asthma, allergies, chronic obstructive pulmonary disease, and other cardiovascular and respiratory diseases.

Homes and buildings near open space areas could also be threatened by future wildfires. All new buildings within a State Responsibility Area, Local Agency Very-High Fire Hazard Severity Zone, or Wildland-Urban Interface Fire Area designated by the enforcing agency must comply with all sections of the Wildland-Urban Interface Fire Area Building Standards. These standards provide a reasonable level of exterior wildfire exposure protection for buildings within these hazard areas and establish minimum standards for materials and material assemblies to lessen the vulnerability of a building to resist the intrusion of flames and burning embers projected during a conflagration or wildfire.[7] Additional resources may be needed to combat additional wildfires in the region, including already-scarce water. Adaptation strategies in the Sustainable Santee Plan include:

- Educate the public on the importance of fire safety.
- Buffer zones between vegetation and structures and infrastructure.
- Identify fire-prone habitats, evaluate and plan for increased risk of larger and more frequent wildfires.

[7] Department of Forestry and Fire Protection, Office of the State Fire Marshal. 2007. *Wildland-Urban Interface Building Standards Information Bulletin*. Website: http://www.fire.ca.gov/fire_prevention/downloads/IB_LRA_Effective_Date.pdf (accessed December 5, 2017).

Social Equity: The City recognizes that some disadvantage populations (e.g., youth, elderly, low-income) may need special assistance in adapting to future climate changes. Disadvantage populations are more likely to be without air conditioning and may need assistance in accessing cooling locations, especially if they do not have cars or cannot drive. Disadvantaged populations may also face increased financial hardships with increased energy use. Some adaptation strategies to ensure the safety of disadvantaged communities include:

- Increase public outreach and educational programs to inform the public of health and safety resources.
- Assist in facilitating access to cooling centers for the public.
- Provide information about available low-income weatherization programs and identify other outreach methods to increase visibility and familiarity with these programs.

3.1.8 Implementation

The Sustainable Santee Plan includes a baseline GHG emissions inventory and recommendations for GHG reduction strategies as a foundation for these efforts. An indicator of the success of these efforts would be a measured reduction in GHG emissions using the measures in the Sustainable Santee Plan. Implementation of the Sustainable Santee Plan could result in construction of energy-generating facilities such as photovoltaic/solar arrays or installation of cool roofs that could be installed on rooftops of new or existing buildings. It could also result in energy-efficiency retrofits in residential, commercial, and municipal buildings throughout the City. In addition to the General Plan, the Sustainable Santee Plan would be an implementation tool that can be used to guide development in the City by focusing on attaining the various goals and policies of the General Plan as well as the GHG reduction goals.

The City's emission reduction efforts would coordinate with State strategies in order to accomplish emission reductions in an efficient and cost-effective manner. The goals and policies set forth in the Sustainable Santee Plan would be implemented through a variety of mechanisms, including:

- Administration and/or staffing;
- Financing and budgeting
- Timelines for measure implementation;
- Community outreach and education; and
- Monitoring, reporting, and adaptive management.

Key to the success of GHG emission reduction efforts is dedicated oversight, required reporting, and periodic revisions to the plan based on updated emissions inventories and/or changes in the regulatory environment. The City may identify one or more staff to act as the Plan Implementation Administrator(s) to guide monitoring, reporting, and dissemination of information to the public. Where possible, the City may use assistants from programs such as CivicSpark, an AmeriCorps program designed to build capacity for local governments to address climate change. This person would educate stakeholders, such as businesses, business groups, residents, developers, and property owners, about the GHG reduction measures that require their participation, encourage participation in these programs, and alert them to program requirements, incentives and/or rebate availability, depending on the measure. The staff would provide annual updates to the City Council on the status of programs within the Sustainable Santee Plan. GHG inventories will be conducted

every 3 to 5 years, the exact year to be determined by funding, to ensure that progress is being made on GHG reductions.

3.2 RELATIONSHIP TO THE GENERAL PLAN

The Santee General Plan provides long-term policy guidance for the physical, economic, and environmental growth in the City. California law requires that other local government programs be consistent with the General Plan. The Sustainable Santee Plan is not part of the General Plan. However, the Sustainable Santee Plan can serve as an implementation tool of the General Plan by focusing on attaining the various goals and policies of the General Plan that relate to GHG emission reduction goals as well as adapting to the changes in the climate. Individual Elements of the General Plan have goals, objectives, and policies related to creating and maintaining a high quality and sustainable city and which can be supported by the Sustainable Santee Plan. These General Plan objectives and policies are summarized in Table 3.10.

TABLE 3.10 Relationship to the General Plan

General Plan Objective or Policy	Sustainable Santee Plan Goal
Land Use Element Policy 3.2: The City should encourage the development and use of recycled water for appropriate land uses to encourage the conservation of, and reduce demand for, potable water.	Goal 2~~5~~: ~~Increase Energy Efficiency through Water Efficiency~~ Increase Energy Efficiency in New Residential Units

TABLE 3.10 Relationship to the General Plan (Continued)

Land Use Element Objective 6.0: Ensure that natural and man-induced hazards are adequately addressed in the location and intensity of development in the City. Policy 6.1: The City shall utilize all mapped information, objectives and policies contained in the Safety and Conservation Elements during the development review process.	Adaptation Planning
Mobility Element Policy 1.1: The City shall provide integrated transportation and land use decisions that enhance smart growth development served by complete streets which facilitate multimodal transportation opportunities.	Goal 6~~10~~: ~~Decrease GHG Emissions from New Development through Performance Standards~~ Decrease GHG Emissions through Reducing Vehicle Miles Traveled

Mobility Element Policy 1.3: The City shall ensure that the entire right of way is designed to accommodate appropriate modes of transportation.	Goal 6~~7~~: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled
Mobility Element Policy 1.4: The City should create a vibrant town center by developing a connected system of multi-modal corridors that encourage walking, biking, and riding transit. A mobility hub should be considered at the existing Santee Trolley Square providing features such as bike share, bike parking, car share, neighborhood electric vehicles real-time traveler information, demand-based shuttle service, wayfinding signage, bicycle and pedestrian improvements, urban design enhancements, etc.	Goal 6~~7~~: ~~Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled~~ Decrease GHG Emissions through Reducing Vehicle Miles Traveled

Mobility Element Policy 2.1: The City shall encourage an automobile Level of Service "D" on street segments and at intersections throughout the circulation network while also maintaining or improving the effectiveness of the non-automotive components of the circulation system (i.e. pedestrians, bicyclists, and public transit), especially in the Town Center area. The City may approve a lower automobile Level of Service if it finds that the effectiveness of non-automotive components of the circulation system would be maintained or improved as a result. In other cases, the City shall not approve any development that causes a drop in the level of service at a street segment or an intersection to LOS "E" or "F", after feasible mitigation, without overriding social, economic, or other benefits.	Goal 6~~7~~: ~~Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled~~ Decrease GHG Emissions through Reducing Vehicle Miles Traveled
Mobility Element Policy 2.9: The City should work with the region to develop traffic and congestion management programs to improve commute times and improve air quality.	Goal 6~~7~~: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled
Mobility Element Policy 3.5: The City shall encourage the use of innovative methods for traffic control (such as roundabouts, curb extensions, and traffic circles) where appropriate that add character, slow vehicle speeds, and create opportunity for improved aesthetics while effectively managing traffic	Goal 6~~7~~: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled
Mobility Element Objective 5.0: Allow parking reductions around transit and affordable housing. Policy 5.1: The City should consider reducing parking requirements in the town center area and at transit stations as transit ridership increases over time due to increased development intensities and a broader mix of land uses. Policy 5.2: The City should maximize shared parking opportunities for uses with varied peak parking periods. Policy 5.3: The City should exercise flexibility in the application of parking standards to support transit-oriented development.	Goal 6~~7~~: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled
Mobility Element Objective 6.0: Increase the use of public transit systems. Policy 6.1: The City should coordinate with SANDAG and MTS to maintain and enhance transit services in the City so that they are efficient, cost-effective, and responsive to growth and redevelopment. Policy 6.2: The City should coordinate with SANDAG and MTS to improve bus stop and shelter facilities to increase the comfort of users. Policy 6.3: The City should coordinate with SANDAG and MTS to provide multi-modal support facilities and adequate access near and to/from transit stops for bicyclists and pedestrians, including children and youth, seniors, and persons with disabilities. Policy 6.4: The City should coordinate with SANDAG and MTS to post route maps and pick-up/drop-off times at each stop. Policy 6.5: The City should coordinate with MTS to encourage establishing	Goal 6: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled; ~~Goal 10: Decrease GHG Emissions from New Development through Performance Standards~~

transit stops in areas of concentrated activity such as near senior housing projects, medical facilities, major employment centers, and mixed use areas. Policy 6.6: The City should coordinate with MTS to accommodate transit centers and major stops with adequate bicycle and pedestrian access and secure bicycle storage where appropriate. Include facilities that are well designed, provide appropriate lighting and are safe, comfortable, and attractive. Policy 6.7: The City should provide incentives for transit-oriented development, such as a parking reduction consistent with regional standards, for more intense development and higher density reside	
Mobility Element Objective 7.0: Develop, maintain, and support a safe, comprehensive and integrated bikeway system that encourages bicycling, as documented in the City's Bicycle Master Plan (BMP). Policy 7.1: The City shall continue to implement and maintain a comprehensive bicycle route system, and to designate appropriate bikeways through the regular update of the City's Bicycle Master Plan. Policy 7.2: The City should strive to achieve objectives and policies identified in the Bicycle Master Plan including those related to bicycle safety awareness, bicycle promotion, maintenance and monitoring. Educational awareness programs shall include an environmental component that teaches bicycle users the importance of staying on designated trails to minimize impacts to wildlife resources. Policy 7.3: The City should promote the development of hiking and bicycle trails along the San Diego River in conjunction with the San Diego River Plan. Any plans for trails along the San Diego River shall be accompanied by a site-specific analysis, as required under CEQA, to confirm that such trails are consistent with the Subarea Plan (SAP) and located in the least environmentally sensitive areas. Policy 7.4: The City should require new development and redevelopment to provide connections to existing and proposed bicycle routes, where appropriate.	Goal 6~~7~~: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled
Mobility Element Objective 8.0: Develop and maintain an accessible, safe, complete and convenient pedestrian system that encourages walking. Policy 8.1: The City should require the incorporation of pedestrian-friendly design concepts where feasible including separated sidewalks and bikeways, landscaped parkways, traffic calming measures, safe intersection designs and access to transit facilities and services into both public and private developments. Policy 8.2: The City should provide for the connectivity of wide, well-lit sidewalks and environments with safety buffers between pedestrians and vehicular traffic, where feasible. Policy 8.3: The City should pursue the elimination of physical barriers around public facilities and commercial centers to improve access and mobility of the elderly and disabled in a manner consistent with the Title 24 of the California Code of Regulations and the federal Americans with Disabilities Act (ADA). Policy 8.4: The City shall require non-contiguous sidewalks on all streets with a residential collector classification or higher, as	Goal 6~~7~~: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled

appropriate. Policy 8.5: The City should identify and implement pedestrian improvements with special emphasis on providing safe access to schools, parks, community and recreation centers, and shopping districts. Policy 8.6: The City should promote walking and improve the pedestrian experience by requiring pedestrian facilities along all classified streets designated on the Circulation Plan; by implementing streetscape improvements along pedestrian routes that incorporate such elements as shade trees, street furniture, and lighting; by orienting development toward the street; by employing traffic calming measures; and by enforcing vehicle speeds on both residential and arterial streets.	
Mobility Element Objective 9.0: Increased use of alternative modes of travel to reduce peak hour vehicular trips, save energy, and improve air quality. Policy 9.1: The City shall encourage and provide for Ride Sharing, Park 'n Ride, and other similar commuter programs that eliminate vehicles from freeways and arterials. Policy 9.2: The City should encourage businesses to provide flexible work schedules for employees. Policy 9.3: The City should encourage employers to offer shared commute programs and/or incentives for employees to use transit. Policy 9.4: The City should encourage the use of alternative transportation modes, such as walking, cycling and public transit. The City should maintain and implement the policies and recommendations of the Bicycle Master Plan and Safe Routes to School Plan to improve safe bicycle and pedestrian access to major destinations. Policy 9.5: The City should improve safety of walking and biking environment around schools to reduce school-related vehicle trips.	Goal ~~6~~7: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled Goal 8: Improve Traffic Flow
Housing Element Policy 3.2: Encourage the use of energy conservation devices such as low flush toilets and weatherization improvements. Promote design concepts that utilize technological advances in the application of alternative energy sources which make the use of the natural climate to increase energy efficiency and reduce housing costs.	Goal 2: Increase Energy Efficiency in New Residential Units Goal 3: Increase Energy Efficiency in Existing Commercial Units Goal 4: Increase Energy Efficiency in New Commercial Units
Housing Element Policy 5.4: Encourage developments of new housing units designated for the elderly and disabled persons to be in close proximity to public transportation and community services.	Goal ~~6~~7: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled
Safety Element Policy 1.1: The City should encourage the use of innovative site design strategies within the floodplain which ensure minimizing of flood hazards, maintaining the natural character of waterways and maximize the use of	Adaptation Planning

water as a design feature. Policy 1.2: All development proposed within a floodplain area shall be required by the City to utilize design and site planning techniques to ensure that structures are elevated at least one foot above the 100-year flood level.	
Trails Element Objective 1.0: Provide safe and viable regional and community trails within the City; Objective 2.0: Provide trails which are designed to impact the environment as little as possible and which blend in with the character of the community; Objective 4.0: Provide promotional material which indicates the type and location of trails in Santee; and Objective 8.0: Provide community trails that link with regional trail systems and facilities.	~~Goal 7: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled~~ Goal 5: Decrease Energy Demand Through Reducing Urban Heat Island Effect

The foundation of planning land use decisions is found in the General Plan. The Sustainable Santee Plan is consistent with and supportive of the General Plan. It would ensure that the impact of future development projects on air quality is minimized, water conserved, and that decisions made by the City and all internal operations within the City are consistent with adopted State legislation.

3.3 OTHER APPLICABLE LAND USE PLANS

The City of Santee has numerous plans that are established to implement and regulate land use and development within a specific project boundary including the Town Center Specific Plan and Gillespie Field and MCAS Miramar Airport Land Use Compatibility Plans (ALUCPs). In most instances, specific plans supersede the original zoning of the land unless otherwise specified. The Town Center Specific Plan was created to achieve the following purposes:

- Establishing a plan for the development of property in its geographic core;
- Providing guidelines for creating a people- and transit-oriented hub for commercial, civic and residential uses along the San Diego River;
- Protecting and enhancing the natural features of the Town Center site, especially the San Diego River;
- Establishing a land use and design framework, which can cohesively tie the new downtown together; and
- Establishing a river and water oriented theme with landscaped boulevards, biological preserves, and defined scale and bulk of buildings.

The ALUCPs were created to achieve the following purposes:

- Promoting airport land use compatibility;
- Providing for the orderly growth of the airport and the area surrounding the airport;
- Safeguarding the general welfare of the inhabitants within the vicinity of the airport and the public in general (Pub. Util. Code §21675(a));

- Serving as a tool for the San Diego County Regional Airport Authority to use in to review land use plans and development proposals within the Airport Influence Area (AIA) at the Airport;
- Providing compatibility policies and criteria applicable to local agencies in their preparation or amendment of general plans and to landowners in their design of new development; and
- Setting guidelines related to land use compatibility, aircraft noise impacts, height protection, and airport safety to ensure land use compatibility.

3.4 DISCRETIONARY ACTIONS, PERMITS AND OTHER APPROVALS

The following actions will be required in order to implement the Sustainable Santee Plan:

- Certification of the Program EIR for the Sustainable Santee Plan by the Santee City Council.
- Adoption of the Sustainable Santee Plan by the Santee City Council.

3.5 INTENDED USES OF THE PROGRAM EIR

One of the goals of the Sustainable Santee Plan is to allow programmatic level review and mitigation of GHG emissions that allows for the streamlining of CEQA review for subsequent development projects. To accomplish this, the Sustainable Santee Plan framework is designed to fulfill the requirements identified in *CEQA Guidelines* Section 15183.5.

Under Section 15183.5 of the CEQA Guidelines, a plan to reduce GHG emissions should:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; **(Chapter 2)**

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable; **(Chapter 2/3)**

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area; **(Chapter 2)**

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; **(Chapter 3)**

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and **(Chapter 5)**

(F) Be adopted in a public process following environmental review.

Note – Next to each Section listed above is the Chapter number (in **bold)** of the Sustainable Santee Plan where that issue is addressed.

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4.0 EXISTING ENVIRONMENTAL SETTING, ENVIRONMENTAL ANALYSIS, IMPACTS, AND MITIGATION MEASURES

4.0.1 OVERVIEW

This Chapter 4 includes seven sections that address the following environmental issues that were either identified in the Initial Study (Appendix A) or, as in the case of Wildfire a new category that was added to the CEQA Guidelines, as having potentially significant impacts and/or requiring further analysis.

- Aesthetics;
- Air Quality;
- Biological Resources;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Land Use and Planning; and
- Wildfire.

4.0.2 ENVIRONMENTAL ISSUES NOT ADDRESSED

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines requires that an EIR contain a statement briefly indicating the reasons that various potentially significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. Per this section of the CEQA Guidelines, this discussion may be included in an attached copy of the Initial Study. The Initial Study for the Sustainable Santee Plan of August 5, 2017 identified the following issues as not to be significant and would not be addressed in the programmatic EIR; however a discussion of these issues is in the Initial Study attached in Appendix A of the EIR:

- Agricultural and Forestry Resources;
- Cultural Resources;
- Geology / Soils;
- Hydrology / Water Quality;
- Mineral Resources;
- Noise;
- Population / Housing;
- Public Services;
- Recreation;

- Tribal Cultural Resources; and
- Utilities and Service Systems

Note that the Notice of Preparation /Initial Study (August 2017) stated that the EIR would review Transportation/Traffic specifically Subsection (f) in that the project would have a potentially significant impact due to a potential conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or would otherwise decrease the performance or safety of such facilities. Two months after the date of the Initial Study, the City of Santee adopted a new Mobility Element of the General Plan (October 25, 2017). The Mobility Element put greater emphasis on complete streets, active transportation, and public transit. Some key policies of the Mobility Element are compared to specific GHG reduction measures from the Sustainable Santee Plan in Table 3.11 of this PEIR. Therefore, Transportation and Traffic, Subsection (f) would have a less than significant impact and this topic was not evaluated in this programmatic EIR.

In addition, Appendix F of the CEQA Guidelines requires that EIRs include a discussion of the potentially significant energy impacts of the project. The Sustainable Santee Plan is a plan and does not create a development that requires additional energy sources. In fact the whole emphasis of the plan is to use less non-renewable energy through the emphasis on renewable energy, active transportation modes, and fostering energy efficient built environment. Therefore, implementation of the Sustainable Santee Plan would result in less energy impacts, and energy is not evaluated in this programmatic EIR.

4.0.3 ENVIRONMENTAL ISSUES ADDRESSED

This chapter includes seven sections that address the following environmental issues and which were identified in the Initial Study (Appendix A) or in the case of Wildfire an added issue to the CEQA Guideline as having potentially significant impacts and/or requiring further analysis.

- Aesthetics;
- Air Quality;
- Biological Resources;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Land Use and Planning; and
- Wildfire

Each of the seven sections identified is organized into eleven subsections, as follows:

- **Scoping Process** describes the analysis of the Initial Study (Appendix A) and notes of any comments received on the relevant environmental topic in response to the NOP.

- **Methodology** describes the approach and methods employed to complete the environmental analysis for the issue under investigation.
- **Existing Environmental Setting** describes the existing conditions at the date of issuance of the Notice of Preparation (August 17, 2017) that may influence or affect the issue under investigation. This section focuses on physical characteristics that are relevant to the environmental topic being analyzed.
- **Regulatory Framework** lists and discusses the laws, ordinances, regulations, and policies that relate to the specific environmental topic and how they apply to the proposed project. The environmental baseline for the analysis of GHG emissions is a 2005 emissions inventory developed as part of the C-CAP.
- **Project Goals and Measures** list the project's goals and measures that are relevant to the environmental topic being analyzed.
- **Impact Significance Criteria** provides the thresholds that are the basis of conclusions of significance, which are primarily the criteria in Appendix G of the *State CEQA Guidelines* and the City of Santee's Initial Study and Initial Study Checklist forms.
- **Project Impacts** describes the potential environmental changes to the existing physical conditions that may occur if the proposed project is implemented. Evidence is presented to show the cause-and-effect relationship between the proposed project and potential changes in the environment. The exact magnitude, duration, extent, frequency, and range or other parameters of a potential impact are ascertained, to the extent feasible, to determine whether impacts may be significant. In accordance with CEQA, potential project impacts, if any, are classified in the following way for each of the environmental topics discussed in this PEIR.
    - *Unavoidable Significant Impact.* Unavoidable significant impacts are those that cannot be fully mitigated or avoided. If the project is approved, decision-makers are required to adopt a Statement of Overriding Considerations pursuant to *State CEQA Guidelines* Section 15093, explaining why the project benefits outweigh the unavoidable adverse environmental effects caused by these significant environmental impacts.
    - *Less than Significant Impact with Mitigation Incorporated*. These are significant environmental impacts that can be feasibly mitigated or avoided. If the project is approved, decision-makers are required to make findings pursuant to *State CEQA Guidelines* Section 15091 that adverse significant impacts have been mitigated to the maximum extent feasible by implementation of mitigation measures.
    - *Less than Significant Impact.* These are environmental impacts that are adverse but not significant. No mitigation is required for less than significant impacts.
- **Level of Significance Prior to Mitigation** summarizes the potentially significant impacts of the project, if any, prior to mitigation.
- **Mitigation Measures** are project-specific measures that would be required of the project to avoid, minimize, rectify, reduce, eliminate, or compensate for a potentially significant adverse impact.

- **Level of Significance after Mitigation** describes the significance of potential impacts after implementation of mitigation measures. Potential significant unavoidable impacts are clearly stated in this section.
- **Cumulative Impacts** describes potential environmental changes to the existing physical conditions that may occur as a result of project implementation together with all other reasonably foreseeable, planned, and approved future projects producing related impacts. The *State CEQA Guidelines* (Section 15355) defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts may result from individually minor but collectively significant projects taking place over a period of time. Projects that have progressed to the state that CEQA review has been initiated are treated as foreseeable probable future projects. For each of the environmental topics considered in this programmatic EIR, the geographic scope of the cumulative analysis is defined.

4.1 AESTHETICS

This section provides a discussion of the existing visual and aesthetic resources in the City and the environmental effects of implementing the proposed Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions ("Sustainable Santee Plan" or "proposed project") with regard to visual quality, views, and light and glare.

The analysis of aesthetics addresses the proposed project's visual relationship with existing and future known land uses in the surrounding area. The analysis of views focuses on the extent to which the proposed project may interfere with visual access to aesthetic features from nearby public vantage points or corridors.

4.1.1 Scope Process

The IS prepared for the proposed project indicated that the proposed project could have potential impacts related to the visual character within the City and from sources of light and glare. Therefore, this topic is analyzed further in this EIR.

The IS determined the proposed project would have no impact on scenic vistas or designated scenic resources within a State Scenic Highway; therefore, these topics are not analyzed further in this EIR. Please refer to Appendix A, IS/NOP, for additional discussion.

The City distributed the NOP for the EIR from August 17 to October 2, 2017. ~~Fifteen c~~ Comment letters were received in response to the NOP. No issues related to visual resources were raised in those comment letters.

4.1.2 Methodology

This section assesses the aesthetic compatibility of the proposed project with the surrounding area and potential impacts to any sensitive views and visual character that may exist in the City's vicinity. The assessment of aesthetic impacts is subjective by nature. This analysis attempts to identify and objectively examine factors that contribute to the perception of aesthetic impacts. Potential aesthetic impacts of the proposed project can be evaluated by considering such factors as the scale, mass, proportion, orientation, landscaping, setbacks, and construction materials associated with the design of a project. The City has not adopted defined standards or methodologies for the assessment of aesthetic impacts.

The analysis of light and glare identifies the locations of light-sensitive land uses and describes the existing ambient conditions in the City's vicinity. The analysis describes the proposed project's proposed light and glare sources and the extent to which proposed project lighting would spill onto adjacent light-sensitive areas. The analysis also considers the potential for sunlight to reflect off of surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles, aviation, or other activities. Glare can also be produced during evening and nighttime hours by artificial light sources, such as illuminated signage and vehicle headlights. Glare-sensitive uses generally include residences and transportation corridors (i.e., roadways).

4.1.3 Existing Environmental Setting

4.1.3.1 Regional Visual Character

The proposed project would apply to the entire 16.5 square miles within the limits of the City of Santee. Santee's location on the fringe of the San Diego metropolitan area gives it visual access to open space beyond its borders. On a clear day, El Capitan Reservoir Recreation Area is well within view and the peaks of the Laguna Mountains are visible in the distance. In addition, Santee is almost completely surrounded by undeveloped land. Mission Trails Regional Park abuts the City on the west and southwest as well as being partially within Santee, providing recreational opportunities as well as a scenic backdrop to the west. Marine Corps Air Station Miramar, which includes thousands of acres of undeveloped land, borders the City to the west and northwest. The County's Sycamore Open Space Preserve and the Goodan Ranch, comprising more than 2,000 acres of natural land, are immediately north of Santee. A low-density portion of the Lakeside community is to the east, with El Capitan Reservoir and the Peninsular Ranges farther in the distance. Gillespie Field, immediately to the south of the City and within El Cajon, constitutes a large open space area necessary for aviation and public safety. The airfield provides a buffer between Santee and industrial areas within El Cajon.[1]

4.1.3.2 Project Site Visual Character

Two main topographic features exist within the City of Santee: the coastal plain of the Coastal Province and the foothills of the Peninsular Range Province. The narrow coastal plain, which is dominated by terraces or mesas and dissected by the San Diego River, occupies the majority of the City. This area, located in the center of the City, is characterized by relatively flat topography. Within the north and southeastern portions of the City are the foothills of the Peninsular Range where the topography is generally steeper.[2]

Some areas are urbanized while peripheral areas still offer a rural setting. Commercial buildings and homes are lower profile, typically two stories or less. Neighborhood cohesiveness is apparent in the mature landscaping and well-kept homes throughout the City. The City has a wealth of physical features that establish community identity:

- San Diego River and other waterway corridors;
- Undeveloped hillsides and ridgelines;
- Town Center;
- Santee Lakes and Mission Trails Regional Parks; and
- San Diego Trolley.

Housing. Newer tract housing (single-family detached) is predominant north of the San Diego River. These homes are typically located on standard subdivision 6,000-square foot or greater lots with

[1] City of Santee. 2003. *General Plan Conservation Element*. August. Page 6-14. http://cityofsanteeca.gov/home (accessed September 6, 2017).

[2] City of Santee. 2003. *General Plan Conservation Element*. August. Page 6-6. http://cityofsanteeca.gov/home (accessed September 6, 2017).

improvements typical of urban development (curb and gutter, sidewalks, underground utilities, storm drains, etc.).

Multiple-family units (apartments, townhomes, and condominiums) predominate along the City's major roads including Mission Gorge Road, Carlton Hills Boulevard, and Magnolia Avenue. As is the case with the City's single-family housing stock, the more recent multiple-family residential developments feature more coordinated site planning and greater amenities (pools, landscaping, open space, etc.).

Mobile homes are located for the most part south of Mission Gorge Road, within self-contained mobile home parks. Mobile homes are distinct elements of the residential development within Santee. They are located in self-contained mobile home parks that function as "micro-neighborhoods." Perimeter design treatments typically include landscaping and block walls. The site layout is typically a grid system of internal roads. Design treatment success is varied among the mobile home parks. Some provide community recreational facilities, adequate street setbacks, and distinctive landscaping and others do not.

The internal organization of Santee's older residential areas is not distinctive and clear delineation of neighborhoods and districts is not often apparent. This has been attributed to the rapid housing expansion that started in the mid-1950s. Strong demand led to the construction of single-family detached tract housing developments, which were built not as an extension of historical settlement patterns but as an economic response to housing market forces. Consequently, residential district boundaries are defined by physical barriers that exist in the City such as SR-67, SR-52, and SR-125, major roads, the San Diego River, Forester Creek, Santee Lakes, and steep topography.

The older housing stock in the south/central part of the City exhibits the highest concentration of units in need of upgrading (1999 Citywide Housing Condition windshield survey). Mobile home parks as a group are well maintained (City of Santee 2003), although some are now quite old. Curbside appeal is an indicator of the level of stewardship in a neighborhood. Negative features that affect this "appeal" include inoperable vehicles, dilapidated fences and walls, front yard encroachments of temporary structures such shade awnings/canopies and weed growth on vacant lots and parkways. Additionally, slopes adjacent to streets may be neglected behind privacy fences. Slopes with public exposure, such as the north side of Mast Boulevard, can be difficult to access and maintain. The City has proactively planted and maintained trees along some of these areas located along very visible major roads.

Commercial Development. Commercial land uses in Santee function as activity centers for residents and visitors. Since these areas are highly visible along major streets, they play an important role in image and identity.

Town Center

The City's primary commercial node is Town Center, the City's 706-acre master-planned city center. Virtually all the significant commercial and office land inventory is located within Town Center. Large tracts of vacant land in the Town Center have been developed as retail "power centers" anchored by big box retailers such as Walmart, Costco, and Home Depot. Santee Trolley Square added over 440,000 square feet of commercial space to the inventory in 2002–2003, offering general

merchandise and other comparison goods shopping and restaurants. These developments differ from the City's older commercial areas in that they exhibit coordinated site designs, including reciprocal access and parking, consistent, high quality architecture, and a high level of amenities such as water fountains, plazas, and enriched building materials. As an example, an amphitheater with an interactive fountain at the terminus of the Trolley line serves as a focal gathering place in the Trolley Square development.

The City adopted the Town Center Specific Plan in October 1986, which established design standards for site planning, public area site improvements, gateway identification, pedestrian and bike paths, street furniture, and signs. Consequently and deliberately, the Town Center has established a commercial identity, consistent with the Town Center Specific Plan, which sets the standard for new development. Recurring architectural elements and site features include stucco, terracotta roof tiles, tile accents, decorative railings, water features, shaded seating areas, and pedestrian promenades. Additionally, reciprocal access, public seating areas, and pedestrian linkages among shopping, residential, and recreational uses have been established.

Mission Gorge Road

The City's principal east-west commercial thoroughfare is Mission Gorge Road, which is characterized in by a mixture of older, independently developed commercial properties and retail stores on single sites with newer commercial development such as Santee Trolley Square and the Marketplace at Santee. Recognizing the prominence of Mission Gorge Road and its role in establishing an image for Santee, in March 1987, the City adopted the Mission Gorge Road Design Standards to establish specific design guidelines for this local scenic road. Existing architectural elements formed the basis for the creation of architectural themes for the various segments of the street. Additionally, standards were established for reciprocal access, streetscape landscaping, signage, and pedestrian and bicycle improvements. Over the past 15 years, the Mission Gorge Road Standards have promoted innovative site design and infused architectural interest on a street that was devoid of distinction.

Other Commercial Strips and Nodes

The principal north-south commercial street is Cuyamaca Street, characterized by independently developed commercial lots offering single destination services (banking, automobile, medical services) and products. Other strip commercial outlets exist along Magnolia Avenue, Mast Boulevard, Carlton Hills Boulevard, and Woodside Avenue. Where these streets intersect, neighborhood shopping centers have developed. The neighborhood shopping center is typically either a freestanding entity (e.g., Santana Village, Carlton Oaks Plaza) or a combination of separate convenience uses. The neighborhood commercial nodes throughout the City provide convenience goods and personal services that meet the daily needs of the immediate neighborhood.

Commercial Design

Over time, Santee businesses have evolved from predominantly independent "mom & pop" stores to corporate outlets within the strip commercial developments along Mission Gorge Road (Vons, Petco, Henrys, Pep Boys, etc.). Neighborhood commercial areas still retain some individual-owned businesses anchored by convenience markets/gas stations.

Commercial centers are subject to the City's development standards that regulate building placement, height, required parking, signs, and landscaping. Comprehensive sign programs for commercial centers have successfully reduced sign clutter and improved signage design. Streetscape landscaping helps contribute to a positive image. Much of the streetscape landscaping in the City's commercial core is maintained through Landscape Maintenance Districts. These publicly operated districts ensure a consistent level of maintenance on the most highly visible landscaped areas.

Industrial Development. Santee's industrial uses are well established along the Woodside Avenue/ SR-67 and Prospect Avenue corridors. The City's industrial development is characterized primarily by warehousing, light manufacturing, assembly, and distribution uses. Along the Prospect Avenue corridor between Magnolia Avenue and Cuyamaca Street, industrial uses are intermixed with commercial and nonconforming residential development. In the Woodside Avenue/SR-67 corridors, recent industrial development has occurred in comprehensively planned industrial parks. There are three master planned industrial parks in Santee: Wheatlands, Maderalado (adjacent to Wheatlands), and the Prospect Business Parks.

The Prospect Avenue industrial area offers a wide variety of building styles, lot configurations, and site features east of Cuyamaca Street, and more cohesive development in an industrial park setting west of Cuyamaca Street. Many of the industrial uses on Prospect Avenue east of Cuyamaca Street were established before incorporation. Uses include contractor storage yards, automobile repair and sales, a Caltrans Maintenance Facility, and vacant parcels within the Gillespie Field Runway Protection Zone. The Prospect Avenue industrial corridor is characterized by a mixture of older smaller individually owned businesses and more recent industrial developments.

The Woodside Avenue/SR-67 area exhibits a more consistent planned industrial park concept where building styles, access, and landscape treatments act as unifying elements. The relatively recent construction of comprehensively planned industrial park development in areas along Woodside Avenue and Prospect Avenue (West of Cuyamaca Street) shows consistently well maintained industrial uses.

Roadways/Streetscapes. Mission Gorge Road establishes the basic primary east-west framework for organization and visual identity for the City and influenced the initial development areas in the City south of the San Diego River. Other major east-west streets include Mast Boulevard and Prospect Avenue. The major north-south streets that cross the San Diego River are Cuyamaca Street, Magnolia Avenue, Carlton Hills Boulevard, and West Hills Parkway.

SR-67 trends north-south along the eastern portion of the City and establishes a very strong visual and physical barrier between the Rattlesnake Mountain area and the rest of the City. The extension of SR-52 from Fanita Drive eastward to SR-67 will extend the regional east-west connection through the City, with freeway connections to local streets at Mast Boulevard, Mission Gorge Road, Fanita Drive, Cuyamaca Street, and Magnolia Avenue.

Direct freeway-to-freeway ramp connections to SR-125 and SR-67 are planned. SR-125 enters the City from the south and runs parallel to Fanita Drive, terminating at Mission Gorge Road.

Mission Gorge Road is a wide traffic corridor providing three lanes of service in each direction. Magnolia Avenue and Cuyamaca Street also provide regional connections to the south in addition to serving local, in-city traffic. The remaining major roads and collectors in Santee carry local traffic within and between neighborhoods. As a result, their scale is local and not regional in nature.

State Routes 67 and 125 have peripheral locations in the City. SR-52 currently terminates at the west end of the City. The extension of SR-52 through the remainder of the City will have a significant visual effect.

State Routes 67 and 125 exhibit grade separations, with minimal interface with local streets. The design of SR-52, which will extend from Fanita Drive to SR-67 includes ramps for local street interface and will be elevated from SR-125 east to its terminus at SR-67. It will introduce ramps, retaining walls, bridge overpasses, and slopes through the southern part of the City. This alignment will not only introduce a significant visual barrier, it will also represent a physical barrier between those areas of the City north and south of the freeway.

Mission Gorge Road traverses the City at grade. It is a wide corridor with landscaped medians from its west entry to Fanita Drive, and between Town Center Parkway and Civic Center Drive. Streetscape features such as landscaping, street furniture, thematic signage, and enriched paving have been added to significant stretches of this corridor as opportunities have arisen.

Landscaped streetscapes and pedestrian improvements have established a pedestrian-friendly feeling for much of Mission Gorge Road. The older areas of Mission Gorge Road do not feature an inviting pedestrian scale.

Class 1 bikeways are designated along portions of Mission Gorge Road, Town Center Parkway, Cuyamaca Street, and Civic Center Drive. Given the large traffic volumes and narrow cross-section on Mission Gorge Road, bike travel is difficult along this corridor. The establishment of a combined sidewalk and bike path within landscaped corridors provides alternative facilities for pedestrians and cyclists on Mission Gorge Road and other streets within Town Center.

Major entry points to the City are provided from the west by Mission Gorge Road and from the east via SR-67 and Woodside Avenue. The west entry along Mission Gorge Road creates a positive statement as the roadway descends into the Santee Valley. The statement is one of an open, rural feeling, utilizing open space and the hillsides as a scenic backdrop. The entry from the east is off SR-67 southbound at Woodside Avenue, where the setting is industrial or northbound at Prospect Avenue where the setting is a mix of industrial and commercial uses. Secondary entry points to the City include Fanita Drive, Cuyamaca Street, and Magnolia Avenue from the south, and El Nopal from the east. As a group, these entryways are undefined.

Scenic Highways. The State's Scenic Highway Program was established in 1963 to protect and enhance California's natural scenic beauty and to protect the social and economic values provided by the State's scenic resources. While scenic highways have traditionally run through open space areas, they can include routes that pass through interesting or unique urban sites. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the

traveler's enjoyment of the view. The City does not contain any officially designated existing State Scenic Highways within its boundaries.

To pursue an official State designation for SR-67 and SR-52, the City would first adopt a scenic corridor protection program and then apply to California department of Transportation ("Caltrans") for scenic highway approval. SR-52, from post mile 9.5 (near Santo Road) to post mile 13.0 (near Mast Boulevard) in the vicinity of Santee, has been designated by the State as State Scenic Highway. The section of SR-52, in Santee between Mast Boulevard and SR-67 is listed by the State as an "unconstructed but eligible" road segment although this segment has been operating since 2011. [3]

Historic Structures. The Edgemoor "Polo Barn" and the Mission Dam Historic site (adjacent to the City) are two significant man-made features illustrative of the Santee community heritage. The green and white "Polo Barn" dates back to 1893 and is considered to be of significant architectural design and a design resource of the community.

The Granite House, or James Love House, is a historic resource of local significance, located in the City's maintenance yard. It was constructed in 1934 using granite quarried from the Coyote Hill quarry. Relocation of the Granite House is necessary with the Forester Creek channel improvements. As such, its preservation either through reconstruction or use of original materials from the structure at a different location or by other symbolic means is important to the City.

The Mission Dam, in the Mission Trails Regional Park, is a registered historic site (National Register of Historic Places, National Historic Landmark, and California Register of Historical Resources) just outside the western City limits. It is a significant design resource documenting the heritage of the region and is an example of the historic uses of the San Diego River.

Open Space. Open space in Santee is predominantly composed of large tracts of undeveloped hillside areas (Fanita Ranch, Rattlesnake Mountain, and hillsides in the southwest portion of the City), land in the San Diego River corridor, and large centrally located vacant parcels in Town Center. Additional open space is provided by parkland (including that associated with school sites) and interspersed vacant parcels.

In summary, open space in Santee provides a number of community design resources:

- Panoramic hillside views and backdrops;
- Visual relief to the intensive developed areas;
- Visual and physical links to the San Diego River and its tributaries (Sycamore Creek and Forester Creek);
- Opportunity areas for new high quality development; and
- Opportunity for recreational activities that reinforce the environmental setting such as hiking trails.

[3] California Department of Transportation List of scenic highways. http://www.dot.ca.gov/design/lap/livability/scenic-highways/ (Accessed February 2, 2019).

The City of Santee is also a participant in the Multiple Species Conservation Program (MSCP) through its Subarea planning efforts. Once adopted, implementation of the City's Subarea Plan will ultimately preserve approximately one fourth of the total area of the City in permanent open space.

Landforms and Views. Encompassed within the landforms of Santee are the flat San Diego River Valley and the gently sloping areas that transition to the steeply sloped hillsides associated with major ridgeline systems. The dramatic hillsides, ridgelines, and rock outcrops form a significant design resource.

The orientation of the San Diego River corridor creates impressive long views within Santee and to the surrounding ridgelines and mountains (including El Capitan). The elevated western entry to the City along Mission Gorge Road also affords an opportunity for scenic views along the San Diego River corridor.

The numerous topographic features of Santee and the surrounding vicinity provide distinctive views and vistas from within the developed portions of the City. This provides residents with scenic backdrops and visual relief from developed portions of the City. The major ridgeline and hillside systems provided by the undeveloped areas of the northern portion of the City, including the Fanita Ranch, present a large portion of these views and vistas. The Rattlesnake Mountain and Mission Trails Regional Park also provide significant views from within Santee.

Surface Water. Surface water resources are composed of three major elements: the San Diego River, Sycamore Creek/Santee Recreational Lakes, and Forester Creek. Secondary elements include Woodglen Vista Creek and Big Rock Creek. This surface water system provides continuous, linear features that not only convey runoff and floodwater but also offer scenic, recreational, habitat preservation, and open space opportunities.

The most significant surface water element in the City is the San Diego River, which flows east to west through the central portion of the City. The river corridor has been maintained and enhanced in accordance with the City's 1984 Santee River Park Plan (discussed in greater detail in the City's General Plan Recreation Element), which seeks to establish a linear rustic park in its urban core, with trails, wildlife interpretation signs, parks, and passive open space.

The Sycamore Creek/Santee Lakes Regional Park provides a strong linear water element/open space corridor that links to the San Diego River corridor from the northern part of the City. The Sycamore Creek/Santee Lakes Regional Park supports recreational activities including picnicking, walking and biking, fishing, and camping.

Forester Creek is currently an unimproved stream that flows into the San Diego River corridor from the south (El Cajon). From a concrete-lined channel in El Cajon, its natural course meanders through a variety of land uses and vacant land, and provides an informal pedestrian link between Cuyamaca Street and Mission Gorge Road. With the completion of the planned Forester Creek Improvement Project, this creek will fulfill its potential as a recreational water element/open space link to the San Diego River.

4.1.4 Regulatory Setting

4.1.4.1 Federal Policies and Regulations

No federal policies or regulations pertaining to aesthetics are applicable to the proposed project.

4.1.4.2 State Policies and Regulations

As described in the IS/NOP, there is no designated State Scenic Highway located within the City. However, a designated State Scenic Highway is located immediately west of the City. SR-52, from post mile 9.5 (near Santo Road) to post mile 13.0 (near Mast Boulevard) in the vicinity of Santee, has been designated by the State as State Scenic Highway on February 2, 2016. However, all of SR-52 has been characterized as eligible for scenic designation. This section of SR-52 within the City of Santee has commercial, industrial, and residential development on both sides. As of February 2019, there are no City plans to pursue scenic designation of SR-52 with its jurisdictions.

The section of SR-52 that has been designated as a scenic highway is located is in the City of San Diego, is surrounded by land under the land use control of the City of San Diego, is located to the northwest of the City of Santee, is approximately 0.45 miles miles from the closest Santee boundary, and portions of Santee are shielded from the roadway by intervening hills. Based on the above, the proposed project would not have a significant impact on scenic highways. Therefore, these regulations are not applicable.

4.1.4.3 Local Policies and Regulations

City of Santee General Plan, Community Enhancement Element. The goal of this element is to respect and integrate the natural and man-made environments of Santee to enhance the quality of life, revitalize older neighborhoods and community places, and sustain a beautiful, distinctive and well organized community for the City's citizens (Santee, 2003). The following objectives related to visual resources are presented in the ~~Conservation~~ Community Enhancement Element:

Objective 2: Strengthen neighborhood identity.

Objective 5: Improve or remove negative visual elements within residential areas.

Objective 6: Improve the appearance and condition of commercial facilities in the City.

Objective 8: Improve the appearance and function of existing and planned industrial areas.

Objective 9: Provide a unifying and distinctive streetscape system throughout the City.

Objective 11: Remove visually disruptive elements from the street system.

Objective 15: Maintain and enhance existing scenic views.

Objective 16: Utilize the natural design elements presented by the river/creek system within the City.

City of Santee Municipal Code. Title ~~17~~ 13, Zoning, of the Santee Municipal Code (SMC) includes site development criteria, as well as design guidelines, for development projects within the City. Among the aspects of development regulated by the SMC are types of allowable land uses, setback and height requirements, solar, landscaping, walls, fencing, signage, access, parking requirements,

storage areas, and trash enclosures. The SMC also provides development review criteria and procedures to determine the development projects' consistency with zoning code, municipal code, and the General Plan.

Town Center Specific Plan. In October 1986, the City of Santee completed a focused effort to plan for the development of property in its geographic core. The Town Center Specific Plan establishes guidelines for creating a people- and transit-oriented hub for commercial, civic, and residential uses along the San Diego River. The Santee Town Center Specific Plan is designed to protect and enhance the natural features of the Town Center site, especially the San Diego River. The Specific Plan is oriented toward establishing a land use and design framework that can cohesively tie the new downtown together. The plan establishes a river and water-oriented theme with landscaped boulevards, biological preserves, and defined scale and bulk of buildings.

4.1.5 Proposed Sustainable Santee Plan – Goals and Measures

The following proposed goals and measures from the Sustainable Santee Plan are applicable to the analysis of aesthetics:

- *Community GHG Reduction Strategies and Emission Reductions.*
  - Goal 1: Increase Energy Efficiency in Existing Residential Units.

    1.1: Energy Audits in Existing Residential Units ~~Efficiency Education and Best Practices~~

    ~~1.2: Increase Community Participation in Existing Energy Efficiency Opportunities~~

    ~~1.4: Residential Home Energy Renovations~~
  - Goal 2: Increase Energy Efficiency in New Residential Units.

    2.1: Energy Efficient Homes
  - Goal 3: Increase Energy Efficiency in Existing Commercial Units.

    3.1: Energy Audits in Existing Commercial Units ~~Efficiency Training, Education, and Recognition in the Commercial Sector~~

    ~~3.2: Increase Business Participation in Existing Energy Efficiency Programs~~

    ~~3.4: Non-Residential Retrofits~~
  - Goal 4: Increase Energy Efficiency in New Commercial Units.

    4.1: Energy Efficient Businesses
  - ~~Goal 5: Increase Energy Efficiency through Water Efficiency~~

    ~~5.1: Increase Energy Efficiency through Enhanced Implementation SBX7-7~~
  - Goal 5~~6~~: Decrease Energy Demand through Reducing Urban Heat Island Effect.

    5.1~~6.1~~: Tree Planting for Shading and Energy Efficiency

    5.2~~6.2~~: Light-reflecting Surfaces for Energy Efficiency

- ~~Goal 10: Decrease GHG Emissions from New Development through Performance Standards.~~

  ~~10.1: Screening Tables~~

- *Municipal GHG Reduction Strategies and Emission Reductions.*
  - Goal M-1: ~~Participate in Education, Outreach, and Planning Efforts for~~ Increase Energy Efficiency of Municipal Buildings.

    M-1.2~~1~~: Install Cool Roofs ~~Increase Energy Savings through the SDG&E Energy Efficiency Partnership~~

Potential Impacts

Measures and Actions to promote and to educate the public on energy efficiency and savings programs (Supporting Measures ~~1.1, 1.2, 1.4, 3.1, 3.2, and 3.4~~) may generate an expanded demand to install roof-top solar photo voltaic panels on the top of existing homes and businesses. Similarly, Measures 2.1, 4.1, ~~6~~5.2, and 10.1 may require roof top or ground mounted solar photo voltaic panels and light reflecting surfaces for new development. Measure~~s~~ 5.1 ~~and 6.1~~ would have the impact of planting more and different types of trees within the City.

4.1.6 Impact Significance Criteria

The thresholds for aesthetic and light and glare impacts used in this analysis are consistent with Appendix G of the *CEQA Guidelines*. The effects of the proposed project on aesthetics are considered to be significant if the proposed project would:

Threshold 4.1.1: Have a substantial adverse effect on a scenic vista.

Threshold 4.1.2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.

Threshold 4.1.3: Substantially degrade the existing visual character or quality of the site and its surroundings.

Threshold 4.1.4: Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area.

The IS, provided in Appendix A and as expanded upon above under State policies section, substantiates the determination that the proposed project would not result in impacts associated with Thresholds 4.1.1 and 4.1.2. As a result, these thresholds are not considered any further in the analyses of the potential impacts of the proposed project related to aesthetics.

4.1.7 Project Impacts

Threshold 4.1.3: *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

The Sustainable Santee Plan does not propose specific development. However, it has measures that ~~encourage~~ require clean energy, energy-saving retrofits to existing buildings, and the planting of new types and increased numbers of trees that would have potential impacts on visual character.

Types of development and retrofits ~~encouraged~~ required by the Sustainable Santee Plan could include incorporation of renewable energy-generating systems in new construction, such as solar panels, photovoltaic arrays, and energy-saving components such as cool roofs ~~and cool pavement~~. Solar photovoltaic panels would likely be visible to visitors, employees, and residents, and screening would inhibit energy production. Depending on the size, mass, and color of these renewable energy-generating and energy-saving components, future redevelopment or development could result in changes to the visual character and quality of an individual site and its surroundings.

However, the incorporation of solar roof-to photo-voltaic systems in buildings is becoming more commonly accepted by the community. Both public high schools in Santee, Santana High School and West Hills High School, have constructed photo-voltaic systems over portions of their respective parking lots. These structures generate renewable energy and act as a shade structure, keeping cars cool in the summer. A similar structure was constructed over the parking lot at the Sports-Plex in Town Center Community Park in Santee. This is in addition to the hundreds of roof-top photo-voltaic systems that have been installed on single-family homes in Santee. Target in Town center has installed a roof-top solar photo-voltaic system behind its parapet was that has helped the building achieve Energy Star Award.

New development projects require a discretionary review under the Santee Municipal Code. These new projects would be required to evaluate their energy efficiency under Measure 2.1~~–10.1 (Screening Tables)~~ and be subject to CEQA review. Discretionary review process would evaluate the ~~Screening Table~~ implementation of energy efficiency improvements to ensure that energy efficiency methodology is compatible with the structure and surrounding development. The General Plan, Land Use Policy 11.1 requires the City to ensure that all requirements set forth within the Community Enhancement Element are implemented during the development review process. This includes the Policies of 6.1, 8.2, and 8.4 of the General Plan, Community Enhancement which are designed to create and maintain a positive visual identify for the City. Light reflecting cool roofs ~~and cool pavement~~ would also be evaluated during this discretionary review.

Energy retrofits on existing structures and installation of solar photo-voltaic systems on rooftops of buildings would not substantially degrade the visual quality or character of the City, as future projects are required to comply with the Municipal Code and be consistent with General Plan policies and measures. The technology of roof-panel construction has improved to the point that steep and obvious mounting angles for such panels is no longer necessary. In fact solar photo-voltaic technology is being incorporated in modern structure's building materials, as per the Tesla solar roof (2019) in which the roof tiles collect the solar energy. Additionally, any energy efficiency device would have to comply with the Santee Municipal Code with regard to height, setbacks, etc. Specifically, Section ~~17~~. 13.06.100 Small Residential Rooftop Solar Energy Systems, requires that the panel or module array does not exceed the maximum legal building height as defined by the City.

The project Measure 5.1 ~~and 6.1~~ would introduce new types and greater number of trees to Santee. Trees reduce the ambient temperatures, create shade, and sequester carbon. Planting trees is consistent with Policy 9.2 of the General Plan, Community Enhancement Element. Trees provide relief from the built environment.

Overall, the impact of the project on Threshold 4.1.3 is less than significant.

Threshold 4.1.4: *Would the project create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?*

Implementation of the Sustainable Santee Plan could result in construction of energy-generating facilities such as solar panels and photovoltaic arrays that would primarily be installed on rooftops of new or existing buildings. These energy-generating structures would not generally include lighting and, therefore, there would be no increased sources of light as a result of implementation of the proposed project.

Glare results from sharply reflected light caused by sunlight or artificial light reflecting from highly finished surfaces such as window glass or brightly colored surfaces. The types of land uses that are typically sensitive to excess glare include homes, hospitals, senior housing, and other types of uses where excessive glare may disrupt sleep. In addition, glare may interfere with the vision of drivers and as discussed in Section 4.5, Hazards and Hazardous Materials, create aviation hazards by interfering with the vision of pilots.

Implementation of the Sustainable Santee Plan could result in energy-generating rooftop structures such as solar panels and photovoltaic arrays, which could introduce substantial new sources of glare. Rooftop solar panels or photovoltaic arrays, to be effective, must be oriented to maximize solar radiation absorption. If these structures were to be constructed adjacent to residential uses or sensitive receptors, the impact from increased glare would be potentially significant. However, solar panels and photovoltaic arrays are designed to maximize sunlight absorption and are generally constructed of dark, light-absorbing materials and are composed of a minimum of reflective surfaces. Modern photo-voltaic systems reflect as little as 2% of incoming sunlight, about the same as water, and less than soil or wood shingles. [4] Therefore, it is not anticipated that solar panels or photovoltaic arrays would result in an increased amount of glare even if they were oriented in such a way as to face sensitive receptors or drivers/pilots.

General Plan policies related to improving visual appearance and neighborhood identity are contained in the Community Enhancement Element. Although none of these policies specifically addresses light and glare effects, and it is unknown at this time where or how many such structures would be constructed under the Sustainable Santee Plan. Each discretionary project pursuant to the Sustainable Santee Plan would be required to undergo individual design and environmental review to develop appropriate mitigation measures particular to each project site. In addition, the following mitigation measure shall be implemented for all discretionary projects under the Sustainable Santee Plan to reduce glare impacts.

With implementation of **MM 4.1-1**, impacts of glare from implementation of the proposed project would be reduced to less than significant by ensuring that energy-generating structures do not pose a safety risk to drivers, adversely affect sensitive receptors, or result in aviation hazards.

[4] Sunshot/U.S. Department of Energy http://solaroutreach.org/wp-content/uploads/2014/06/Solar-PV-and-Glare-_Final.pdf (Accessed February 27, 2019)

4.1.8 Level of Significance Prior to Mitigation

Prior to mitigation, energy-generating structures could result in glare resulting in a potentially significant impact. All other potential impacts related to aesthetics would be less than significant.

4.1.9 Mitigation Measure

MM 4.1-1 All proposed energy-generating structures shall be constructed utilizing non-reflective materials to the maximum extent feasible. If a reflective material is used, appropriate shielding shall be placed or the structure relocated to reduce the amount of visible glare. The City shall review all discretionary projects prior to issuance of building permits to ensure that appropriate shielding and placement of such structures are included in design plans.

4.1.10 Level of Significance after Mitigation

Implementation of MM 4.1-1 will ensure impacts from glare are mitigated to a less than significant level. There would be no significant unavoidable adverse impacts of the proposed project related to aesthetics.

4.1.11 Cumulative Impacts

The geographic context for this cumulative analysis is the City and the view from beyond the City. Due to the City's location where certain areas are bounded by hills, the affected area is not highly visible from surrounding areas nor would the Sustainable Santee Plan have an influence on surrounding areas. Since the Sustainable Santee Plan covers the entire City, cumulative impacts would be same as the impacts identified above for the proposed project. All future development would be required to comply with proposed policies that regulate the design of new buildings as well as protect the existing visual quality of the City. All development or redevelopment projects that are not ministerial would also undergo further environmental and development review on a project-by-project basis to ensure that the visual quality of the surrounding environment is not substantially compromised. Therefore, on a cumulative level, implementation of the proposed project would not substantially degrade the visual quality or character of the City, and the cumulative impact would be less than significant.

Impacts from light and glare are generally localized and site-specific; therefore, the context for an analysis of cumulative impacts from light and glare would be geographically limited to the City. Cumulative development in this geographic area has resulted in moderate to high levels of ambient light and glare typical of urban areas in the more developed areas, and lower levels of light and glare near City boundaries. Future development in this geographic context would further increase sources of light and glare, which could be potentially significant if future projects introduce light and glare into areas of the City that have lower levels of ambient lighting. The proposed project would not result in new sources of substantial light, since future energy-generating structures would generally not be lighted. Therefore, the proposed project would not make a cumulatively considerable contribution to any cumulative light impact. The proposed project could result in localized increases sources of glare. However, implementation of project-level mitigation measures and **MM 4.1-1** would reduce any localized glare impact to less than significant and the project would not make a

cumulatively considerable contribution to any cumulative glare impact. The cumulative impacts would be less than significant.

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4.2 AIR QUALITY

This section evaluates the potential air quality impacts associated with implementation of the proposed Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas reductions ("Sustainable Santee Plan" or "proposed project"). This analysis evaluates the proposed project's consistency with applicable air quality plans. This section is based on information provided in the proposed project's Air Quality Analysis Memo provided in Appendix C.

4.2.1 Scope Process

The Initial Study (IS) prepared for the proposed project indicated that implementation of the proposed project could conflict with or obstruct implementation of the applicable air quality plan. Therefore, this topic is analyzed further in this EIR.

The IS determined implementation of the proposed project would decrease emissions, thereby improving air quality, which would result in a less than significant impact in relation to the following thresholds:

1. The proposed project would not 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.

2. The proposed project would not expose sensitive receptors to substantial pollutant concentrations.
3. The proposed project would not result in other emissions (such as those leading to objectionable odors) adversely affecting a substantial number of people.

Therefore, these topics are not analyzed further in this EIR. Please refer to Appendix A, IS/NOP, for additional discussion.

The City distributed the NOP for the EIR from August 17 to October 2, 2017. ~~Fifteen c~~ Comment letters were received in response to the NOP. No issues related to air quality were raised in those comment letters.

4.2.2 Methodology

The Air Quality Analysis for the proposed project (Appendix C) includes an estimate of emissions associated with short-term construction and long-term operation of the proposed project. Criteria pollutants with regional impacts would be emitted by stationary and mobile sources involving any project-related changes. Energy usage and VMT data were obtained from the proposed project, and the current models, California Emissions Estimator Model (CalEEMod) Version 2016.3.2 and OFFROAD2007, were used to estimate the project-related mobile and stationary source emissions in this air quality assessment.

The net increase in pollutant emissions determines the significance and impact on regional air quality as a result of a proposed project. The results also allow the local government to determine

whether the proposed project would deter the region from achieving the goal of reducing pollutants in accordance with the Air Quality Management Plan (AQMP) in order to comply with the federal and State Ambient Air Quality Standard (AAQS).

4.2.3 Existing Environmental Setting

The project site is in the City of Santee, which is in the San Diego Air Basin (SDAB) and is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD), the California Air Resources Board (ARB), and the United States Environmental Protection Agency (EPA).

4.2.3.1 Regional Air Quality

The State of California and the federal government have established health-based AAQS for seven air pollutants. As shown in Table 4.2.A, these pollutants are ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter with a diameter of 10 microns or less (PM_{10}), fine particulate matter with a diameter of less than 2.5 microns ($PM_{2.5}$), and lead (Pb). In addition, the State has set AAQS for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These AAQS are designed to protect the health and welfare of the populace with a reasonable margin of safety.

Table 4.2.A: Federal and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]		Federal Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
Ozone (O_3)[8]	1-Hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	0.070 ppm (137 µg/m³)		0.070 ppm (137 µg/m³)		
Respirable Particulate Matter (PM_{10})[9]	24-Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		—		
Fine Particulate Matter ($PM_{2.5}$) [9]	24-Hour	No Separate State Standard		35 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	12.0 µg/m³	15 µg/m³	
Carbon Monoxide (CO)	8-Hour	9.0 ppm (10 mg/m³)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m³)	None	Non-Dispersive Infrared Photometry (NDIR)
	1-Hour	20 ppm (23 mg/m³)		35 ppm(40 mg/m³)		
	8-Hour (Lake Tahoe)	6 ppm (7 mg/m³)		—	—	—
Nitrogen Dioxide (NO_2)[10]	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m³)	Same as Primary Standard	Gas Phase Chemiluminescence

Table 4.2.A: Federal and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]		Federal Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
	1-Hour	0.18 ppm (339 µg/m³)		100 ppb (188 µg/m³)	—	
Sulfur Dioxide (SO_2)[11]	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	0.030 ppm (for certain areas)[11]	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	24-Hour	0.04 ppm (105 µg/m³)		0.14 ppm (for certain areas)[11]	—	
	3-Hour	—		—	0.5 ppm (1300 µg/m³)	
	1-Hour	0.25 ppm (655 µg/m³)		75 ppb (196 µg/m³)	—	
Lead[12,13]	30-Day Average	1.5 µg/m³	Atomic Absorption	—	—	High-Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m³ (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average[11]	—		0.15 µg/m³		
Visibility-Reducing Particles[14]	8-Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	**No Federal Standards**		
Sulfates	24-Hour	25 µg/m³	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24-Hour	0.01 ppm (26 µg/m³)	Gas Chromatography			

Footnotes to Table 4.2.A:

1 California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$ and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2 National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measure at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24 hour standard is attained when the expected number of days per calendar year with a 24 hour average concentration above 150 µg/m³ is equal to or less than one. For $PM_{2.5}$, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

3 Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4 Any equivalent procedure which can be shown to the satisfaction of ARB to give equivalent results at or near the level of the air quality standard may be used.

5 National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[6] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[7] Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.

[8] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[9] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[10] To attain the 1-hour national standard, the 3-year average of the 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[11] On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[12] The ARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[13] The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standards are approved.

[14] In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basins, respectively.

°C = degrees Celsius ARB=California Air Resources Board EPA = United States Environmental Protection Agency
µg/m^3 = micrograms per cubic meter mg/m^3 = milligrams per cubic meter ppm = parts per million
ppb = parts per billion

In addition to identifying these primary and secondary AAQS, the State has established a set of episode criteria for O_3, CO, NO_2, SO_2, and PM_{10}. These criteria refer to episode levels representing periods of short-term exposure to air pollutants that actually threaten public health. Health effects are progressively more severe as pollutant levels increase from Stage 1 to Stage 3. An alert will be declared when any one of the pollutant alert levels is reached at any monitoring site and meteorological conditions are such that the pollutant concentrations can be expected to remain at these levels for 12 or more hours or to increase, or as in the case of oxidants, the situation is likely to recur within the next 24 hours unless control actions are taken.

Stage 1 pollutant alert levels[1] are as follows:

- O_3: 392 micrograms per cubic meter (µg/m^3) (0.20 parts per million [ppm]), 1-hour average.

[1] San Diego County Air Pollution Control District. 1991. Rule 127: Episode Criteria Levels. Website: http://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Air_Pollution_Emergency_Plan/APCD_R126-127.pdf (accessed September 19, 2017).

- CO: 17 milligrams per cubic meter (mg/m^3) (15 ppm), 8-hour average.
- NO_2: 1,130 µg/m^3 (0.6 ppm) 1-hour average; 282 µg/m^3 (0.15 ppm) 24-hour average.
- SO_2: 800 µg/m^3 (0.3 ppm), 24-hour average.
- Particulates, measured as PM_{10}: 350 µg/m^3, 24-hour average

Table 4.2.B lists the primary health effects and sources of common air pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety (EPA), these health effects will not occur unless the standards are exceeded by a large margin or for a prolonged period of time. State AAQS (CAAQS) are more stringent than federal AAQS (NAAQS). Among the pollutants, O_3 and particulate matter ($PM_{2.5}$, and PM_{10}) are considered regional pollutants, while the others have more localized effects.

Table 4.2.B: Summary of Health Effects of the Major Criteria Air Pollutants

Pollutant	Health Effects	Examples of Sources
Particulate Matter ($PM_{2.5}$ and PM_{10}: less than or equal to 2.5 or 10 microns, respectively)	• Hospitalizations for worsened heart diseases • Emergency room visits for asthma • Premature death	• Cars and trucks, especially diesels • Fireplaces, wood stoves • Windblown dust from roadways, agriculture, and construction
Ozone (O_3)	• Cough, chest tightness • Difficulty taking a deep breath • Worsened asthma symptoms • Lung inflammation	• Formed by chemical reactions of air pollutants in the presence of sunlight; common sources are motor vehicles, industries, and consumer products
Carbon Monoxide (CO)	• Chest pain in heart patients • Headaches, nausea • Reduced mental alertness • Death at very high levels	• Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Nitrogen Dioxide (NO_2)	• Increased response to allergens	• See CO sources
Toxic Air Contaminants	• Cancer • Chronic eye, lung, or skin irritation • Neurological and reproductive disorders	• Cars and trucks, especially diesels • Industrial sources such as chrome platers • Neighborhood businesses such as dry cleaners and service stations • Building materials and products

The California Clean Air Act (CCAA) provides SDAPCD and other air districts with the authority to manage transportation activities at indirect sources. Indirect sources of pollution are generated when minor sources collectively emit a substantial amount of pollution. Examples of this would be motor vehicles at an intersection, a mall, and on highways. The SDAPCD also regulates stationary sources of pollution throughout its jurisdictional area. Direct emissions from motor vehicles are regulated by the ARB.

4.2.3.2 Climate and Meteorology

Air quality in the SDAB is affected by various emissions sources (e.g., mobile, industry) and by atmospheric conditions such as wind speed, wind direction, temperature, and rainfall. Climate in the SDAB is determined by its terrain and geographical location. The boundaries of the SDAB are contiguous with the political boundaries of San Diego County. The County of San Diego encompasses

approximately 4,260 square miles and is bounded on the north by Orange and Riverside Counties, on the east by Imperial County, on the west by the Pacific Ocean, and on the south by the Mexican State of Baja California. The County is divided by the Laguna Mountain Range which runs approximately parallel to the coast about 45 miles inland and separates the coastal area from the desert portion of the County. The Laguna Mountains have peaks reaching over 6,000 feet, with the highest point in the County being Hot Springs Mountain rising to 6,533 feet. The coastal region is made up of coastal terraces that rise from the ocean into wide mesas, which then, moving farther east, transition into the Laguna Foothills. Farther east, the topography gradually rises to the rugged mountains. On the east side, the mountains drop off rapidly to the Anza-Borrego Desert, which is characterized by several broken mountain ranges with desert valleys in between. To the north of the County are the Santa Ana Mountains, which run along the coast of Orange County, turning east to join with the Laguna Mountains near the San Diego-Orange County border.

The climate of the SDAB, as with all of Southern California, is largely dominated by the strength and position of the semi-permanent high-pressure system over the Pacific Ocean, known as the Pacific High. This high-pressure ridge over the West Coast often creates a pattern of late-night and early-morning low clouds, hazy afternoon sunshine, daytime onshore breezes, and little temperature variation year round. The climatic classification for San Diego is a Mediterranean climate, with warm, dry summers and mild, wet winters. Average annual precipitation ranges from approximately 10 inches on the coast to over 30 inches in the mountains to the east (the desert regions of San Diego County generally receive between 4 and 6 inches per year).

The annual average temperature varies little throughout the SDAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological station closest to the project site is the El Cajon Station.[2] The monthly average maximum temperature recorded at this station from November 1979 to June 2016 ranged from 69.3°F in December to 88.9°F in August, with an annual average maximum of 77.9°F. The monthly average minimum temperature recorded at this station ranged from 41.3°F in December to 64.2°F in August, with an annual average minimum of 52.4°F. December is typically the coldest month, and August is typically the warmest month in this area of the SDAB.

The majority of annual rainfall in the SDAB occurs between November and March. Summer rainfall is minimal and is generally limited to scattered thunder showers in coastal regions and slightly heavier showers in the eastern portion of the SDAB and along the coastal side of the mountains. The El Cajon climatological station monitored precipitation from November 1979 to June 2016. Average monthly rainfall measured in El Cajon during that period varied from 0.63 inch or less between May and October to 2.75 inches in February, with an annual total of 12.40 inches. Patterns in monthly and yearly rainfall totals are unpredictable due to fluctuations in the weather.

The favorable climate of San Diego also works to create air pollution problems. Sinking, or subsiding air, from the Pacific high pressure creates a temperature inversion, known as a subsidence inversion, which acts as a lid to vertical dispersion of pollutants. Weak summertime pressure

[2] Western Regional Climate Center. El Cajon, California (042706). Website: https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca2706 (accessed September 19, 2017).

gradients further limit horizontal dispersion of pollutants in the mixed layer below the subsidence inversion. Poorly dispersed anthropogenic emissions combined with strong sunshine leads to photochemical reactions, which results in the creation of ozone at this surface layer.

Daytime onshore flow (i.e., sea breeze) and nighttime offshore flow (i.e., land breeze) are quite common in Southern California. This leads to emissions being blown out to sea at night and returning to land the following day. Under certain conditions, this atmospheric oscillation results in the offshore transport of air from the Los Angeles region to San Diego County, which often results in high ozone concentrations being measured at San Diego County air pollution monitoring stations. Transport of air pollutants from Los Angeles to San Diego has also been shown to occur aloft within the stable layer of the elevated subsidence inversion. In this layer, removed from fresh emissions of oxides of nitrogen, that would scavenge and reduce ozone concentrations, high levels of ozone are transported into San Diego County. The prevailing wind direction in the City is westerly for 11 months of the year; in August, the prevailing wind is southeasterly to east-southeasterly.

4.2.3.3 Air Pollution Constituents and Attainment Status

The ARB coordinates and oversees both State and federal air pollution control programs in California. The ARB oversees activities of local air quality management agencies and maintains air quality monitoring stations throughout the State in conjunction with the EPA and local air districts. The ARB has divided the State into 15 air basins, based on meteorological and topographical factors of air pollution. Data collected at these stations are used by the ARB and EPA to classify air basins as attainment, nonattainment, nonattainment-transitional, or unclassified, based on air quality data for the most recent three calendar years compared with the AAQS. Nonattainment areas are imposed with additional restrictions as required by the EPA. The air quality data are also used to monitor progress in attaining air quality standards. The four designations are defined as follows:

- Nonattainment: Assigned to areas where monitored pollutant concentrations consistently violate the standard in question, and are imposed with additional restrictions as required by the EPA.
- Maintenance: Assigned to areas where monitored pollutant concentrations exceeded the standard in question in the past but are no longer in violation of that standard.
- Attainment: Assigned to areas where pollutant concentrations meet the standard in question over a designated period of time.
- Unclassified: Assigned to areas where data are insufficient to determine whether a pollutant is violating the standard in question.

Table 4.2.C lists the attainment status for criteria pollutants in the SDAB.

Ozone. O_3 (smog) is formed by photochemical reactions between oxides of nitrogen and reactive organic gases. Ozone is a pungent, colorless gas typical of Southern California smog. Elevated ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, the elderly, and young children. Ozone levels peak during summer and early fall. The entire SDAB is designated as a nonattainment area for the State 1-hour and 8-hour ozone standards. The EPA has officially

designated the status for the Basin regarding the 8-hour ozone standard as "Extreme," which means the SDAB has until 2024 to attain the federal 8-hour O_3 standard.

Table 4.2.C: Attainment Status of Criteria Pollutants in the San Diego Air Basin

Pollutant	State	Federal
O_3 1-hour	Serious Nonattainment	N/A
O_3 8-hour	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment/Unclassified
$PM_{2.5}$	Nonattainment	Attainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Attainment/Unclassified
SO_2	Attainment	Attainment
All others	Attainment/Unclassified	Attainment/Unclassified

Source: Air Pollution Control District (2017), Website: http://www.sdapcd.org/content/sdc/apcd/en/air-quality-planning/attainment-status.html

ARB = California Air Resources Board
CO = carbon monoxide
N/A = not applicable
NO_2 = nitrogen dioxide
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matte less than 2.5 microns in diameter
SO_2 = sulfur dioxide

Carbon Monoxide. CO is formed by the incomplete combustion of fossil fuels, almost entirely from automobiles. It is a colorless, odorless gas that can cause dizziness, fatigue, and impairment to central nervous system functions. The entire SDAB is in attainment for the State standards for CO. The SDAB is designated as an "Attainment/Maintenance" area under the federal CO standards.

Nitrogen Oxides. Nitrogen dioxide (NO_2), a reddish-brown gas, and nitric oxide (NO), a colorless, odorless gas, are formed from fuel combustion under high temperature or pressure. These compounds are referred to as nitrogen oxides, or NOx. NOx is a primary component of the photochemical smog reaction. It also contributes to other pollution problems, including a high concentration of fine particulate matter, poor visibility, and acid deposition (i.e., acid rain). NO_2 decreases lung function and may reduce resistance to infection. The entire Basin is designated as Attainment for the State NO_2 standard and as an "Attainment/Maintenance" area under the federal NO_2 standard.

Sulfur Dioxide. SO_2 is a colorless irritating gas formed primarily from incomplete combustion of fuels containing sulfur. Industrial facilities also contribute to gaseous SO_2 levels. SO_2 irritates the respiratory tract, can injure lung tissue when combined with fine particulate matter, and reduces visibility and the level of sunlight. The entire SDAB is in attainment for both federal and State SO_2 standards.

Lead. Lead is found in old paints and coatings, plumbing, and a variety of other materials. Once in the blood stream, lead can cause damage to the brain, nervous system, and other body systems. Children are highly susceptible to the effects of lead.

Particulate Matter. Particulate matter is the term used for a mixture of solid particles and liquid droplets found in the air. Coarse particles, PM_{10}, derive from a variety of sources, including

windblown dust and grinding operations. Fuel combustion and resultant exhaust from power plants and diesel buses and trucks are primarily responsible for fine particle ($PM_{2.5}$) levels. Fine particles can also be formed in the atmosphere through chemical reactions. PM_{10} can accumulate in the respiratory system and aggravate health problems such as asthma. The EPA's scientific review concluded that $PM_{2.5}$, which penetrates deeply into the lungs, is more likely than PM_{10} to contribute to the health effects listed in a number of recently published community epidemiological studies at concentrations that extend well below those allowed by the current PM_{10} standards. These health effects include premature death and increased hospital admissions and emergency room visits (primarily the elderly and individuals with cardiopulmonary disease); increased respiratory symptoms and disease (children and individuals with cardiopulmonary disease such as asthma); decreased lung functions (particularly in children and individuals with asthma); and alterations in lung tissue and structure and in respiratory tract defense mechanisms. The entire SDAB is a nonattainment area for both federal and State $PM_{2.5}$ standards. The SDAB is also a nonattainment area for State PM_{10} standards, and Attainment/Maintenance for federal PM_{10} standards.

Reactive Organic Compounds. Reactive organic compounds (ROCs), also known as reactive organic gases (ROGs) and volatile organic compounds (VOCs), are formed from combustion of fuels and evaporation of organic solvents. ROCs are not defined criteria pollutants but are a prime component of the photochemical smog reaction. Consequently, ROCs accumulate in the atmosphere more quickly during the winter when sunlight is limited and photochemical reactions are slower.

Sulfates. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized to SO_2 during the combustion process and subsequently converted to sulfate compounds in the atmosphere. The conversion of SO_2 to sulfates takes place comparatively rapidly and completely in urban areas of California due to regional meteorological features. The entire SDAB is in attainment for the State standard for sulfates.

Hydrogen Sulfide. Hydrogen sulfide (H_2S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. In 1984, an ARB committee concluded that the ambient standard for H_2S is adequate to protect public health and to significantly reduce odor annoyance. The entire SDAB is in attainment for the State standard for H_2S.

Visibility-Reducing Particles. Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consist of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size, and chemical composition and can be made up of many different materials such as metals, soot, soil, dust, and salt. The statewide standard is intended to limit the frequency and severity of visibility impairment due to regional haze. The entire SDAB is unclassified for the State standard for visibility-reducing particles.

4.2.3.4 Local Air Quality

The SDAPCD, together with the ARB, maintains ambient air quality monitoring stations in the SDAB. The air quality monitoring station closest to the project site is the El Cajon-Floyd Smith station, and its air quality trends are representative of the ambient air quality in the project area. The pollutants monitored at this station are O_3, PM_{10}, $PM_{2.5}$, and NO_2 and are shown in Table 4.2.D. CO and SO_2 are not monitored at this station. Values for CO are from 2011–2012 at the El Cajon-Redwood Avenue Station, and values for SO_2 are from 2011–2013 at the El Cajon-Redwood Avenue Station. The ambient air quality data in Table 4.2.D show that SO_2, CO, NO_2, and PM_{10} levels stay below the relevant State standards, and CO, PM_{10}, and NO_2 stay below relevant federal standards. O_3 and $PM_{2.5}$ levels occasionally exceed both State and federal standards.

4.2.4 Regulatory Setting

4.2.4.1 Federal Policies and Regulations

Federal Clean Air Act. Pursuant to the Federal Clean Air Act (CAA) of 1970, the EPA established national ambient air quality standards (NAAQS). The NAAQS were established for six major pollutants termed "criteria" pollutants. Criteria pollutants are defined as those pollutants for which the federal and State governments have established AAQS, or criteria, for outdoor concentrations in order to protect public health.

Data collected at permanent monitoring stations are used by the EPA to classify regions as "attainment" or "nonattainment," depending on whether the regions met the requirements stated in the primary NAAQS. Nonattainment areas are imposed with additional restrictions as required by the EPA.

The EPA has designated the San Diego Association of Governments (SANDAG) as the Metropolitan Planning Organization (MPO) responsible for ensuring compliance with the requirements of the CAA for the SDAB.

The EPA established new national air quality standards for ground-level ozone and fine particulate matter in 1997. On May 14, 1999, the Court of Appeals for the District of Columbia Circuit issued a decision ruling that the CAA, as applied in setting the new public health standards for ozone and particulate matter, was unconstitutional as an improper delegation of legislative authority to the EPA. On February 27, 2001, the United States Supreme Court upheld the way the government sets air quality standards under the CAA. The Court unanimously rejected industry arguments that the EPA must consider financial costs as well as health benefits in writing standards. The justices also rejected arguments that the EPA took too much lawmaking power from Congress when it set tougher standards for ozone and soot in 1997. Nevertheless, the court threw out the EPA's policy for implementing new ozone rules, saying that the agency ignored a section of the law that restricts its authority to enforce such rules.

Table 4.2.D: Ambient Air Quality Monitored at the El Cajon-Floyd Smith Station

Pollutant	Standard	2014	2015	2016
Carbon Monoxide (CO)[a]				
Maximum 8-hour concentration (ppm)		1.46[b]	1.86[c]	*
Number of days exceeded:	State: ≥ 9.0 ppm	0[b]	0[c]	*
	Federal: ≥ 9 ppm	0[b]	0[c]	*
Ozone (O_3)				
Maximum 1-hour concentration (ppm)		0.083	0.082	0.096
Number of days exceeded:	State: > 0.09 ppm	0	0	1
Maximum 8-hour concentration (ppm)		0.075	0.067	0.077
Number of days exceeded:	State: > 0.07 ppm	2	0	3
	Federal: > 0.07 ppm	2	0	3
Coarse Particulates (PM_{10})				
Maximum 24-hour concentration (µg/m³)		33	48	39
Number of days exceeded:	State: > 50 µg/m³	0	0	0
	Federal: > 150 µg/m³	0	0	0
Annual arithmetic average concentration (µg/m³)		18.3	22.3	20.0
Exceeded for the year:	State: > 20 µg/m³	No	Yes	No
Fine Particulates ($PM_{2.5}$)				
Maximum 24-hour concentration (µg/m³)		13.9	24.7	19.3
Number of days exceeded:	Federal: > 35 µg/m³	0	0	0
Annual arithmetic average concentration (µg/m³)		*	*	*
Exceeded for the year:	State: > 12 µg/m³	Yes	Yes	Yes
	Federal: > 15 µg/m³	*	Yes	Yes
Nitrogen Dioxide (NO_2)				
Maximum 1-hour concentration (ppm)		0.057	0.059	0.057
Number of days exceeded:	State: > 0.18 ppm	0	0	0
	Federal: > 0.10 ppm	0	0	0
Annual arithmetic average concentration (ppm)		*	*	*
Exceeded for the year:	State: > 0.030 ppm	*	*	*
	Federal: > 0.053 ppm	*	*	*
Sulfur Dioxide (SO_2)[a]				
Maximum 24-hour concentration (ppm)		0.001[b]	0.001[c]	0.001[d]
Number of days exceeded:	State: > 0.04 ppm	0[b]	0[c]	0[d]

Sources: EPA and ARB websites: http://www.epa.gov/airdata/ad_maps.html and www.arb.ca.gov/adam/welcome.html. Also https://www.arb.ca.gov/adam/topfour/topfourdisplay.php.

µg/m³ = micrograms per cubic meter
ARB = California Air Resources Board
EPA = United States Environmental Protection Agency
N/A = data not available
ppm = parts per million

* = insufficient data available to determine the value.
[a] values from El Cajon- Redwood Ave Station
[b] values for 2011
[c] values for 2012
[d] values for 2013

In April 2003, the EPA was cleared by the White House Office of Management and Budget (OMB) to implement the 8-hour ground-level ozone standard. The EPA issued the proposed rule implementing the 8-hour ozone standard in April 2003. The EPA completed final 8-hour nonattainment status on April 15, 2004. The EPA revoked the 1-hour ozone standard on June 15, 2005, and lowered the 8-hour O_3 standard from 0.08 ppm to 0.075 ppm on April 1, 2008.

The EPA issued the final $PM_{2.5}$ implementation rule in fall 2004. The EPA lowered the 24-hour $PM_{2.5}$ standard from 65 to 35 µg/m^3 and revoked the annual PM_{10} standard on December 17, 2006. The EPA issued final designations for the 2006 24-hour $PM_{2.5}$ standard on December 12, 2008.

4.2.4.2 State Policies and Regulations

California Clean Air Act. In 1988, the CCAA required that all air districts in the State endeavor to achieve and maintain CAAQS for carbon monoxide, ozone, sulfur dioxide, and nitrogen dioxide by the earliest practical date. The CCAA provides air districts with authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emissions sources. Each nonattainment air district is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan shows how an air district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

California Air Resources Board. The ARB is part of the California Environmental Protection Agency (CalEPA) and is responsible for coordination and administration of State and federal air quality programs in California. The main goals of the ARB include protecting the public from toxic air contaminants, providing solutions for complying with air pollution rules and regulations, and attaining and maintaining healthy air quality for the State. The ARB also works with both the federal government and local air quality districts to develop California's State Implementation Plan (SIP).

4.2.4.3 Local and Regional Policies and Regulations

San Diego County Air Pollution Control District. The SDAPCD is the local agency responsible for the administration and enforcement of air quality regulations for the SDAB, which includes all of San Diego County. The SDAPCD regulates most air pollutant sources, except for motor vehicles, marine vessels, aircraft, and agricultural equipment, which are regulated by the ARB or EPA. State and local government projects, as well as projects proposed by the private sector, are subject to SDAPCD requirements if the sources are regulated by the SDAPCD. Additionally, the SDAPCD, along with the ARB, maintains and operates ambient air quality monitoring stations at numerous locations throughout San Diego County. These stations are used to measure and monitor ambient criteria and toxic air pollutant levels.

San Diego Association of Governments. SANDAG is the San Diego region's primary public planning, transportation, and research agency, providing the public forum for regional policy decisions about growth, transportation planning and construction, environmental management, housing, open space, energy, public safety, and binational topics. The SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the AAQS in the SDAB.

Regional Air Quality Strategy. The Regional Air Quality Strategy (RAQS) was adopted by the SDAPCD Board in 1992, and was most recently revised in 2016. The RAQS rely on information from the ARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then establish the strategies necessary for the reduction of emissions through regulatory controls. The ARB mobile source emissions projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County as part of the development of their general plans. As such, projects that propose development consistent with the growth anticipated by the general plans would be consistent with the RAQS. In the event that a project would propose development that is less dense than anticipated within the general plan, the project would likewise be consistent with the RAQS. If the project proposes development that is greater than that anticipated in the general plan and SANDAG's growth projections, the project might be in conflict with the RAQS and might have a potentially significant impact related to air quality.

Air Quality Management Plan. The applicable air quality plans are the SIP and RAQS. As discussed above, the SIP includes strategies and tactics to be used to attain and maintain acceptable air quality in the SDAB. The RAQS is a separate document that contains a list of strategies to maintain acceptable air quality. The SIP relies on the same information from SANDAG to develop emissions inventories and emission reduction strategies that are included in the attainment demonstration for the SDAB. The SIP also includes rules and regulations that have been adopted by the SDAPCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and thereby hinder attainment of the NAAQS for O_3.

Measures to Reduce Particulate Matter in San Diego County Report. This report is based on particulate matter reduction measures adopted by the ARB. The SDAPCD evaluated the ARB's list of measures and found the majority were already being implemented in the County. As a result of the evaluation, the SDAPCD proposed measures for further evaluation to reduce particulate matter emissions from residential wood combustion and from fugitive dust from construction sites and unpaved roads.

4.2.4.4 Proposed Sustainable Santee Plan Goals and Measures

The following proposed Goals and Measures are applicable to the analysis of Air Quality.

- *Community GHG Reduction Strategies and Emission Reductions*
  - Goal 1: Increase Energy Efficiency in Existing Residential Units
    - 1.1: Energy Audits in the Existing Residential Sector ~~Energy Efficiency Education and Best Practices~~
    - ~~1.2: Increase Community Participation in Existing Energy Efficiency Opportunities~~
    - ~~1.3: Home Energy Evaluations (Supporting Measure)~~
    - ~~1.4: Residential Home Energy Renovations~~
  - Goal 2: Increase Energy Efficiency in New Residential Units

- 2.1: Energy Efficiency Improvements of Residential Sector ~~Exceed Energy Efficiency Standards~~

- Goal 3: Increase Energy Efficiency in Existing Commercial Units
  - 3.1: Energy Audits in the Existing Commercial Sector ~~Energy Efficiency Training, Education, and Recognition in the Commercial Sector~~
  - 3.2: Increase Business Participation in Existing Energy Efficiency Programs
  - 3.3: Non-Residential Energy Audits
  - 3.4: Non-Residential Retrofits.
- Goal 4: Increase Energy Efficiency in New Commercial Units
- 4.1: Meet or Exceed Tier 2 Voluntary Measures Energy Efficiency Standards ~~Exceed Energy Efficiency Standards~~

- ~~Goal 5: Increase Energy Efficiency through Water Efficiency~~
  - ~~5.1: Support Water Efficiency through Enhanced Implementation of SB X7-7~~
  - ~~5.2: Exceed Water Efficiency Standards~~
- Goal 5: Decrease Energy Demand through Reducing Urban Heat Island Effect
  - ~~6~~5.1: Tree Planting for Shading and Energy Efficiency
  - ~~6~~5.2: Light-reflecting Surfaces for Energy Efficiency
  - ~~6.3: Carbon Sequestration through Preservation of Natural Lands~~
- Goal ~~6~~7: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled
  - ~~6~~7.1: Non-Motorized Transportation Options
  - ~~6~~7.2: Implement Bicycle Master Plan ~~Create Bicycle Master Plan to Expand Bike Routes around the City~~
  - ~~7.3: Promote Ride Sharing Programs within Businesses~~
  - ~~7.4: Electrify the Fleet~~
  - ~~7.5: Complete Streets and Safe Routes to Schools Programs~~
  - ~~7.6: School Bus Program~~

- ~~o~~ Goal ~~7~~8: Increase Use of Electric Vehicles ~~Decrease Greenhouse Gas Emissions through Reducing Solid Waste Generation~~
  - ~~7~~8.1: Electric Vehicle Charger Program ~~Reduce Waste to Landfills~~

- ~~o~~ Goal ~~8~~9: Improve Traffic Flow
  - ~~8~~9.1: Traffic Flow Improvement Program ~~Promote Clean Energy~~
  - ~~9.2: Community Choice Aggregation Program~~

- Goal 9~~10~~: Decrease GHG Emissions through Reducing Solid Waste Generation ~~Decrease GHG Emissions from New Development through Performance Standards~~
  - 9~~10~~.1: Reduce Waste at Landfills ~~Screening Tables~~
- Goal 10: Decrease GHG Emissions through Increasing Clean Energy Use
  - 10.1: Increase Distributed Renewable Energy Generation within the City of Santee
  - 10.2: Community Choice Aggregation Program

- *Municipal GHG Reduction Strategies and Emission Reductions*
  - ~~o~~ Goal M-1: Increase Energy Efficiency in Municipal Buildings ~~Participate in Education, Outreach, and Planning Efforts for Energy Efficiency~~
    - M-1.1: Procurement Policy for Energy-Efficient Equipment ~~Increase Energy Savings through the SDG&E Energy Efficiency Partnership~~
    - M-1.2 Install Cool Roofs
    - M-1.3 Retrofit HVAC and Water Pumping Equipment
  - Goal M-2: Increase Energy Efficiency in Community Buildings and Infrastructure ~~Municipal Buildings~~
    - M-2.1: Traffic Signal and Outdoor Lighting Retrofits ~~Conduct Municipal Energy Audit~~
  - Goal M-~~4~~3: On-Road Energy Efficiency Enhancements; Employee Commute and Vehicle Fleet
    - M-43.1: Employee Carpools
    - M-~~4~~3.2: Purchase of Hybrid or Electric Vehicles
    - M-~~4~~3.3: Replace or Supplement Vehicle Fleet with Hybrid/Electric Vehicles
    - M~~4~~3.4: Install E-Vehicle Chargers
  - Goal M-~~5~~4: Reduce Energy Consumption in the Long Term
    - M-~~5~~4.1: Ongoing Actions and Projected Reductions
  - Supporting Measures

☐ Designate a Sustainable Program Manager to oversee implementation of the Sustainable Santee Plan.

☐ Within six months of adoption of the Sustainable Santee Plan, establish a City webpage dedicated to the Sustainable Santee Plan that provides information to residents, businesses, and project applicants related to the plan, including but not limited to:

- Financial incentives for reducing energy use, such as home upgrades through the HERO program, the California Solar Initiative, the Property-Assessed Clean Energy (PACE) program, and rainwater harvesting rebates;
- Process for obtaining Tier 1 and Tier 2 Green Building Ratings such as LEED, Build It Green/Green Point Rating System, or Energy Star® certified buildings;
- Programs and incentives to facilitate the installation of EV-chargers;

- Updates to Title 24;
- Measures and opportunities to reduce, reuse, and recycle waste;
- Available ridesharing programs and school bus services and the benefits of both;
- Programs and events in Santee promoting energy efficiency and sustainability;
- Options for obtaining an energy audit for residences and businesses, such as through Energy Upgrade California;
- Training opportunities offered by City, SDG&E and other entities on reducing energy and fuel use; and
- Application of the Sustainable Santee Consistency Checklist for new development.
- Application and tracking of the Screening Tables for new development

☐ Within six months of adoption of the Sustainable Santee Plan, establish an email recipient list for Santee residences, business, and interested persons to provide periodic email updates on the Sustainable Santee Plan and information on ways to facilitate its goals.

☐ On or before December 2020:

- Establish online permitting to facilitate upgrades to residences and businesses;
- Update the City's official street tree list to include more water-efficient varieties;
- Update the Zoning Ordinance to add clarity on desired recreational amenities in multifamily complexes to replace the previously desired pool and water features;
- Conduct a municipal energy audit, and continue to do so every two years, to inform City staff on municipal energy use and opportunities for improvement;
- Conduct a study to evaluate the feasibility of installing EV charging stations on City property;
- Upgrade or incorporate water-conserving landscape at City facilities, to the extent feasible; and
- Plant trees in City-owned spaces to reduce urban heat island effect and building energy use and increase carbon sequestration, to the extent feasible.

☐ Track energy efficiency retrofits of existing residential and commercial land uses within the City through the permit application process.

Potential Impacts

The Sustainable Santee Plan is a plan to reduce GHG emissions on Santee consistent with State legislation and regulation. The plan consists of 10 Goals with associated Measures designed to reduce Community-wide GHG emissions and ~~5~~ 4 Goals and associated Measures designed to reduce Municipal GHG emissions (a subset of Community emission). GHG includes some of the Environmental Protection Agency (EPA) designated criteria air pollutants such as Nitrogen Dioxide, Sulfur Dioxide, and Carbon Monoxide. The plan with its Goals and Measures will reduce GHG emissions and thereby improve air quality.

4.2.5 Impact Significance Criteria

The following thresholds of significance are based on Appendix G of the *CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact

with respect to air quality if it would:

Threshold 4.2.1: Conflict with or obstruct implementation of the applicable air quality plan.

Threshold 4.2.2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable Federal or State ambient air quality standard.

Threshold 4.2.3: Expose sensitive receptors to substantial pollutant concentrations.

Threshold 4.2.4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The IS, provided in Appendix A, has determined that the proposed project would not result in impacts associated with **Thresholds 4.2.2** through **Threshold 4.2.4**. As a result, these thresholds are not considered any further in the analyses of the potential impacts of the proposed project related to air quality.

4.2.6 Project Impacts

Threshold 4.2.1: *Conflict with or obstruct implementation of the applicable air quality plan?*

The applicable air quality plans are the SIP and RAQS. As discussed above, the SIP includes strategies and tactics to be used to attain and maintain acceptable air quality in the SDAB. The RAQS is a separate document that contains a list of strategies to maintain acceptable air quality. Consistency with the RAQS is typically determined by two standards. The first standard is whether the proposed project would exceed assumptions contained in the RAQS. The second standard is whether the proposed project would increase the frequency or severity of existing air quality violations, contribute to new violations, or delay the timely attainment of air quality standards or interim reductions as specified in the RAQS.

The RAQS and SIP are intended to address cumulative impacts in the SDAB based on future growth predicted by SANDAG in the 2030 Regional Growth Forecast Update. SANDAG uses growth projections from the local jurisdictions' adopted General Plans; therefore, development consistent with the applicable General Plan would be generally consistent with the growth projections in the air quality plans.

The proposed project would implement goals and measures designed to increase energy efficiency and reduce VMT. The Sustainable Santee Plan includes Community GHG Reduction Strategies and Emissions Reductions, and Municipal GHG Reduction Strategies and Emission Reductions. While these reduction strategies were formulated to reduce greenhouse gases, they also act to improve overall air quality by reducing emissions of criteria pollutants.

The following are potential short-term and long-term air quality impacts that would result from implementation of the Sustainable Santee Plan.

4.2.6.1 Short-Term Construction Air Quality Impacts

Implementation of the proposed project could result in construction of energy-generating facilities

such as photovoltaic/solar arrays or installation of cool roofs that would primarily be installed on rooftops of new or existing buildings. It could also result in energy-efficiency retrofits in existing residential, commercial, and municipal buildings throughout the City. However, details of the potential construction activities are unknown. Each individual construction activity associated with future development projects will need to comply with the CEQA.

4.2.6.2 Long-Term Operational Air Quality Impacts

Long-term air pollutant emission impacts are those associated with stationary sources and mobile sources involving any changes related to the proposed project. The citywide energy usage (including electricity and natural gas) and VMT data were obtained from the proposed project and entered in CalEEMod under User Defined Industrial land use of one unit size. The countywide off-road emissions were calculated from OFFROAD2007 model and proportioned to citywide emissions based on relevant indicator data, as described in the Sustainable Santee Plan. Table 4.2.E presents a summary of the peak daily emissions for the Sustainable Santee Plan baseline year 2005, forecast year 2035 (under business as usual scenario), and changes in emissions ~~between baseline year and forecast years~~. The CalEEMod and OFFROAD2007 model outputs and calculations are provided in Appendix C, Air Quality Analysis Memo.

Table 4.2.E: Regional Operational Emissions

Source	Pollutant Emissions, pounds per day					
	ROG	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
Existing Land Use Emissions (2005)						
Energy	21.6	196.0	164.6	1.2	14.9	14.9
Mobile	1,278.3	3,711.0	6,974.2	12.9	764.1	215.0
Off-Road	729.4	2,220.8	5,293.5	18.3	145.0	—[1]
Total Existing Emissions	**2,029.3**	**6,127.8**	**12,432.4**	**32.4**	**924.0**	**229.9**
General Plan Emissions (2035)						
Energy	25.7	233.9	196.5	1.4	17.8	17.8
Mobile	965.5	4,638.5	5,569.5	16.3	1,329.6	361.9
Off-Road	688.9	268.3	5,946.7	7.5	23.2	—[1]
Total General Plan (2035) Emissions	**1,680.1**	**5,140.7**	**11,712.7**	**25.3**	**1,370.6**	**379.7**
Changes in Emissions with the Sustainable Santee Plan-As compared to BAU Emissions (2035)						
Energy	-8.05	-73.17	-61.46	-0.44	-5.56	-5.56
Mobile	-343.66	-1,651.11	-982.51	-5.81	-473.28	-128.83
Off-Road	0.00	0.00	0.00	0.00	0.00	—[1]
Changes to Emissions Totals	**-351.71**	**-1,724.28**	**-1,043.97**	**-6.25**	**-478.84**	**-134.40**
SDAPCD Thresholds	**75.0**	**250.0**	**550.0**	**250.0**	**100.0**	**55.0**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (December 2018).

Note: [1] Assumes all particulate matter emissions from off-road equipment are PM_{10}.

CO = carbon monoxide
NOx = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SOx = sulfur oxides

Table 4.2.E shows that the Sustainable Santee Plan would decrease all criteria air pollutants emissions from both baseline and buildout of General Plan and thus would not exceed the corresponding SDAPCD daily emission thresholds for any criteria pollutants.

The proposed project would reduce regional criteria air pollutants emissions and is not expected to result in any long-term regional air quality impacts. Therefore, the project will not conflict with the RAQS or SIP, and no significant impact will result with respect to implementation of the air quality plan. The Sustainable Santee Plan is an implementation tool of the City's General Plan, does not change the City's population, is considered to be within the SANDAG growth projections, and thus would be consistent with the SIP and RAQS. Therefore, implementation of the Sustainable Santee Plan would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant.

4.2.7 Level of Significance Prior to Mitigation

All potential impacts related to air quality would be less than significant.

4.2.8 Mitigation Measures

The proposed project would not result in any significant adverse impacts related to air quality. No mitigation is required.

4.2.9 Level of Significance after Mitigation

There would be no significant unavoidable adverse impacts of the proposed project related to air quality.

4.2.10 Cumulative Impacts

The analysis of air quality is cumulative in nature and no separate analysis is required. Cumulative air quality impacts are less than significant.

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4.3 BIOLOGICAL RESOURCES

This section evaluates the potential biological resources impacts associated with implementation of the proposed *Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions* ("Sustainable Santee Plan" or "proposed project") This analysis evaluates the proposed project's consistency with provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or State habitat conservation plan.

4.3.1 Scope Process

The City distributed the NOP for the EIR from August 17 to October 2, 2017. ~~Fifteen c~~ Comment letters were received in response to the NOP. Two issues related to biological resources were raised in those comment letters. The first letter recommended consistency in regard to how the significance of impacts will be evaluated as well as site-specific biological technical reporting for subsequent CEQA environmental documentation for projects that tier from the PEIR. The second letter requested that the City consider the existing Multiple Species Conservation Program (MSCP) including the adopted South County Plan, preliminary draft North County Plan, and preliminary draft map for the East County Study Area as part of the PEIR analysis.

The Initial Study (IS) prepared for the proposed project indicated that implementation of energy production facilities could conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan. The IS also determined that the following impacts would be less than significant 1) an adverse effect on any candidate, sensitive, or special status species; 2) an adverse effect on any riparian habitat or other sensitive natural community; 3) an adverse effect on any state or federally protected wetlands; 4) interfere with the movement of any native resident of migratory fish or species; and 5) conflict with local policies protecting biological resources. Please refer to Appendix A, IS/NOP, for additional discussion

Later activities identified in the Sustainable Santee Plan subject to CEQA review will be examined to determine whether their potential effects to biological resources were analyzed in the PEIR.

4.3.2 Methodology

As noted above, the only potentially significant issue related to biological resources and implementation of the Sustainable Santee Plan is potential conflicts with an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plans. Therefore, *t*he programs and measures contained in the Sustainable Santee Plan were compared to adopted HCPs, NCCPs, and other approved local, regional, or State HCP provisions to determine if any conflicts exist. These HCPs include the San Diego Multiple Species Conservation Program and respective Subarea plans.

4.3.3 Existing Environmental Setting

The proposed project would apply to the entire 16.5 square miles within the limits of the City of Santee. Two main topographic features exist within the City of Santee - the coastal plain of the Coastal Province, and the foothills of the Peninsular Range Province (Santee 2003). The narrow coastal plain, which is dominated by terraces or mesas and dissected by the San Diego River, occupies the majority of the City. This area, which is found in the center of the City, is characterized

by relatively flat topography. Within the north and southeastern portions of the City are the foothills of the Peninsular Range. Topography is generally steeper in the far northern areas of the City, including the Carlton Hills and Fanita Ranch areas, and in the south including the Rattlesnake Mountain, Mission Trails and Grossmont Mesa areas. Topographic elevations range from approximately 300 to 1,200 feet within the City.

Biological resources (plants and wildlife) are often distributed based on the topographic characteristics. The most predominate natural habitat is Coast Sage Scrub followed by Chaparral, Grassland, and Riparian.

The City of Santee is working on their portion of the Multiple Species Conservation Program (MSCP) Subregional Plan (City of San Diego 1998) Area. The MSCP is located in the southwestern portion of the San Diego region, and includes the City of Santee, portions of the unincorporated County of San Diego, and ten other jurisdictions (cities of San Diego, Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, Lemon Grove, National City, and Poway). The MSCP is a comprehensive program designed to create, manage, and monitor an ecosystem preserve and is intended to protect viable populations of native plant and animal species and their habitats in perpetuity, while accommodating continued economic development and quality of life amenities such as open space and hiking opportunities for residents within the area. The MSCP Subregional Plan is implemented through local Subarea Plans.

4.3.4 Regulatory Setting

4.3.4.1 Federal Policies and Regulations

The MSCP serves as an Habitat Conservation Plan (HCP) pursuant to Section 10(a)(1)(B) of the Federal Endangered Species Act.

4.3.4.2 State Policies and Regulations

The MSCP serves as a Natural Community Conservation Plan (NCCP) under the State of California, Fish and Game Code, Section 2800.

4.3.4.3 Local Policies and Regulations

San Diego Multiple Species Conservation Program. The San Diego MSCP was approved in 1998 and covers the southwestern portion of San Diego County. The City of Santee, unincorporated portions of the County, and ten additional city jurisdictions make up the MSCP Plan Area. The San Diego MSCP is a comprehensive conservation program that works to create a balance between preservation of natural resources and biodiversity, and future economic growth. The MSCP covers 900 square miles and focuses on conservation of 85 species (City of San Diego 1998). The San Diego MSCP allows local jurisdictions to maintain land use control and implement their respective portions of the MSCP through Subarea Plans. The City is drafting its Subarea Plan that would preserve more than 2,600 acres of the City as permanent open space and would aim to balance development needs with habitat conservation (City of Santee 2003).

San Diego River Park Master Plan. The San Diego River Park Master Plan provides a vision and guidance for development within a half-mile for a 17.5-mile section of the San Diego River starting

within the boundaries of the City of San Diego extending from the Pacific Ocean and into the City of Santee. The plan provides guidance on how to restore the relationship between the river and surrounding communities making it an asset through the added environmental, social, cultural, and economic value added to a community. The Master Plan is a policy document and includes visions, principles, recommendations, and implementation strategies (City of San Diego 2013).

Conservation Element of the Santee General Plan. Adopted in 2003, 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.

Santee Municipal Code. Chapter ~~17.16~~ 13.16 of the Santee Municipal Code describes the Park/Open Space District which indicates areas of permanent open spaces, biological resource protection and/or areas precluded from major development and encourage recreational activities and preservation of natural resources.

4.3.5 Proposed Sustainable Santee Plan - Goals and Measures

The following proposed Goals and supporting Measures are applicable to the analysis of biological resources:

- *Community GHG Reduction Strategies and Emission Reductions*
  - ~~Goal 5 : Increase Energy Efficiency through Water Efficiency~~
    - ~~5.1: Water Efficiency through Enhance Implementation of SBX7-7~~
  - Goal ~~6~~ 5: Decrease Energy Demand through Reducing Urban Heat Island Effect
    - ~~6~~5.1: Tree Planting for Shading and Energy Efficiency
    - ~~6.3: Carbon Sequestration through Preservation of Natural Lands~~
- *Municipal GHG Reduction Strategies and Emission Reductions.*
  - Goal M-~~3~~1: Increase Energy Efficiency in ~~Community~~ Municipal Buildings ~~and Infrastructure~~
    - M-~~3~~1.2: Install Cool Roofs ~~Upgrade or Incorporate Water-Conserving Landscape~~
    - M-~~3~~1.3: Retrofit HVAC and water pump equipment ~~Plant Trees for Shade and Carbon Sequestration~~

Potential Impacts

~~One of the action items under Goal 5 (Measure 5.1) would be to develop and Urban Forest Management Plan.~~ Goal ~~6~~5 is to decrease energy demand by reducing the urban heat island effect. The is supported by Measure ~~6~~5.1 to plant more trees ~~consistent with the Urban Forest Management Plan and Measure 6.3~~ a Supporting Measure which involves tree planting on City owned spaces to provide Carbon sequestration ~~through preservation of natural lands~~. ~~Municipal Measures M-3.2 and M-3.3 call for water efficient landscapes and the planting of more trees~~. Physical changes to the environment expected to occur as a result of these Goals and Measures would be a more energy efficient municipal facilities and the ~~addition of more water efficient landscape and the~~ addition of more trees in Santee.

4.3.6 Impact Significance Criteria

The thresholds for biological resources used in this analysis are consistent with Appendix G of the *CEQA Guidelines*. The effects of the proposed project on biological resources are considered to be significant if the proposed project would result in:

Threshold 4.3.1: Substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Threshold 4.3.2: Substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Threshold 4.3.3: 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.

Threshold 4.3.4: Substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites.

Threshold 4.3.5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Threshold 4.3.6: Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP.

The IS, provided in Appendix A, substantiates the determination that the proposed project would not result in impacts associated with Thresholds 4.3.1 through 4.3.5. As a result, these thresholds are not considered any further in the analyses of the potential impacts of the proposed project related to biological resources. A comment letter from The California Department of Fish and Wildlife requested that clarity be added for projects that tier off the Sustainable Santee Plan. Later activities identified in the Sustainable Santee Plan subject to CEQA review will be examined to determine whether their potential effects to biological resources were analyzed in the PEIR, and if not a new initial study would need to be prepared leading to either an EIR or a negative declaration. That later analysis may tier from the PEIR.

4.3.7 Project Impacts

Threshold 4.3.6: *Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP.*

The MSCP is the NCCP for San Diego County (City of San Diego 1998). The MSCP allows local jurisdictions to maintain land use control and implement their respective portions of the MSCP through Subarea Plans. The City is drafting its Subarea Plan, which will act as an HCP in combination with the MSCP. The City's MSCP Subarea Plan aims to balance development needs with habitat conservation and would ultimately protect approximately one-fourth of the City as permanent open space (City of Santee 2003). The City's MSCP Subarea Plan will also specify where future

development and habitat preservation are expected to occur and what biological mitigation is required of future development. Once the Sustainable Santee Plan is adopted, any future development projects that would implement Sustainable Santee Plan measures and actions would be subject to all applicable City regulations and requirements, including the City's MSCP Subarea Plan. In addition, future projects would be required to comply with CEQA.

The San Diego River Park Master Plan provides a vision and guidance for development within a half-mile for a 17.5-mile section of the San Diego River, which includes portions of the City of Santee. Future development projects that would implement Sustainable Santee Plan measures and actions would be subject to all applicable visions, principles, recommendations and implementation strategies within the San Diego River Park Master Plan.

Therefore, implementation of the Sustainable Santee Plan would not result in any conflict with approved habitat conservation plans. Impacts would be less than significant.

4.3.8 Level of Significance Prior to Mitigation

All potential impacts related to biological resources would be less than significant.

4.3.9 Mitigation Measures

The proposed project would not result in any significant adverse impacts related to biological resources. No mitigation is required.

4.3.10 Level of Significance after Mitigation

There would be no significant unavoidable adverse impacts of the proposed project related to biological resources.

4.3.11 Cumulative Impacts

The geographic context for this cumulative analysis is the City of Santee, which assumes implementation of the existing and future HCPs located within the City's limits. All development in this geographic context is required to be consistent with the applicable HCPs, and any inconsistencies with the HCPs must be identified as impacts in the environmental analysis.

All future development would be required to comply with the Subarea Plan once it is adopted as well as all applicable City regulations and requirements. Additionally, all development or redevelopment projects would also undergo further environmental and development review on a project-by-project basis to ensure that the surrounding environment is not substantially compromised. Therefore, on a cumulative level, implementation of the proposed project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP. Therefore, the cumulative impact would be less than significant.

4.4 GLOBAL CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS

This section provides a discussion of Global Climate Change (GCC), existing regulations pertaining to GCC, and an analysis of greenhouse gas (GHG) emissions associated with implementation of the proposed Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions ("Sustainable Santee Plan" or "proposed project") . This analysis examines the proposed project's consistency with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases.

4.4.1 Scoping Process

The Initial Study (IS) prepared for the proposed project indicated that implementation of the proposed project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases and further analysis is required in an EIR.

The IS determined implementation of the proposed project would reduce the generation of greenhouse gas emissions, either directly or indirectly and therefore would not have a significant impact on the environment. Therefore, these topics are not analyzed further in this EIR. Please refer to Appendix A, IS/NOP, for additional discussion.

The City distributed the NOP for the EIR from August 17 to October 2, 2017. ~~Fifteen c~~ Comment letters were received in response to the NOP. One letter addressed issues related to global climate change and greenhouse gas. However, the letter was addressing these issues as they relate to the Sustainable Santee Plan, not the environmental analysis, and will therefore not be addressed here. The comments in the letter will be forwarded to the City for review and consideration.

4.4.2 Methodology

The recommended approach for GHG analysis included in the State of California Governor's Office of Planning and Research's (OPR) June 2008 Technical Advisory is to (1) identify and quantify GHG emissions, (2) assess the significance of the impact on climate change, and (3) if significant, identify alternatives and/or mitigation measures to reduce the impact below a level of significance.[1] The June 2008 Technical Advisory provides some additional direction regarding planning documents as follows: "CEQA can be a more effective tool for GHG emissions analysis and mitigation if it is supported and supplemented by sound development policies and practices that will reduce GHG emissions on a broad planning scale and that can provide the basis for a programmatic approach to project-specific CEQA analysis and mitigation. For local government lead agencies, adoption of general plan policies and certification of general plan EIRs that analyze broad jurisdiction-wide impacts of GHG emissions can be part of an effective strategy for addressing cumulative impacts and for streamlining later project-specific CEQA reviews" (June 2008 Technical Advisory, pages 7–8).

A Draft CEQA and Climate Change Advisory was published by OPR in December 2018 which updates the 2008 Technical Advisory to reflect current regulations and case law. This advisory notes the Lead Agency's discretion in choosing a model or methodology it considers most appropriate to

[1] State of California Governor's Office of Planning and Research, Technical Advisory, CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act Review (June 19, 2008).

enable decision makers to intelligently take into account a projects incremental contribution to climate change (p.6). In addition, the draft advisory reiterates the Legislature's intent to use a greenhouse gas reduction plan to streamline analysis of individual projects (p.17).

The current (2019) Appendix G Checklist of the *CEQA Guidelines* suggest that the project be evaluated for the following impacts:

- Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

4.4.3 Existing Environmental Setting

Global climate change refers to alterations in weather, which occur across the Earth as a whole, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by naturally occurring atmospheric gases, including water vapor, carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). These gases allow solar radiation (sunlight) into the Earth's atmosphere, but prevent radiative heat from escaping, thus warming the Earth's atmosphere. Global climate change attributable to anthropogenic (human) emissions of greenhouse gases (primarily CO_2, CH_4, and N_2O) is currently one of the most important and widely debated scientific, economic, and political issues in the United States.

Gases that trap heat in the atmosphere are often referred to as greenhouse gases, analogous to a greenhouse effect. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the Earth's temperature. Without these natural greenhouse gases, the Earth's temperature would be about 61 degrees Fahrenheit cooler. Emissions from human activities, such as vehicle, natural gas, electricity usage, and water usage have elevated the concentration of these gases in the atmosphere. The gases that are widely seen as the principal contributors to human-induced GCC are:[1]

- CO_2
- CH_4
- N_2O
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur Hexafluoride (SF_6)

Greenhouse gases have varying Global Warming Potential (GWP), which is a measure of how much a given mass of greenhouse gas is estimated to contribute to global warming. It is a relative scale that compares the gas in question (e.g., N_2O and CH_4) to that of the same mass of carbon dioxide. CO_2 is

[1] The greenhouse gases listed are consistent with the definition in Assembly Bill (AB) 32 (Government Code 38505), as discussed later in this section.

considered to be a reference gas with a GWP of 1 and is the baseline unit with which all other greenhouse gases are compared. The carbon dioxide equivalent (CO_2e) is most appropriate method of assessing emissions because it gives weight to the GWP of the gas. Table 4.6.A presents a summary of the atmospheric lifetime and GWP of selected gases. The other main greenhouse gases that have been attributed to human activity—methane and nitrous oxides—have GWPs of 21 and 310 million metric tons (MMT)[1] of carbon dioxide equivalent (MMT CO_2e), respectively.

Table 4.4.A: Global Warming Potential of Selected Gases

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide	50-200	1
Methane	12 ± 3	21
Nitrous Oxide	120	310
HFC-23	264	11700
HFC-134a	14.6	1300
HFC-152a	1.5	140
PFC: Tetrafluoromethane (CF_4)	50000	6500
PFC: Hexafluoromethane (C_2F_6)	10000	9200
Sulfur Hexafluoride (SF_6)	3200	23900

Source: Environmental Protection Agency, 2008.

4.4.3.1 Inventory

This section summarizes the latest information on global, United States, California, and local GHG emission inventories.

Global Emissions. Worldwide emissions of CO_2e totaled 25 billion metric tons (MT) in 2012.[2] Global estimates are based on country inventories developed as part of the programs of the United Nations Framework Convention on Climate Change (UNFCCC).

United States Emissions. In 2014, the United States emitted approximately 6,870 million MT of CO_2e. Total U.S. emissions have increased by 7.4 percent from 1990 to 2014, and emissions increased from 2013 to 2014 by 1 percent. The increase from 2013 to 2014 was due to year-to-year changes in prevailing weather, and an increase in on-road vehicles miles traveled. Since 1990, U.S. emissions have increased at an average annual rate of 0.31 percent.[3]

State of California Emissions. California's gross emissions of GHGs decreased by approximately 8 percent from 478.4 MMT CO_2e in 2001 to 440.4 MMT CO_2e in 2015, with a maximum of 489.2 MMT CO_2e in 2004. During the same period, California's population grew by 9 percent from 34.5 to 38.9

1 One teragram (Tg) is equal to one million metric tons. (A metric ton is approximately 1.1 tons).

2 Total of Annex I Country CO_2e emissions, excluding LU/LUCF. UNFCCC, 2013. *Greenhouse Gas Inventory Data.* http://unfccc.int/ghg_data/ghg_data_unfccc/time_series_annex_i/items/3814.php

3 United States Environmental Protection Agency (EPA). Archived website snapshot from January 19, 2017. The U.S. Greenhouse Gas Inventory Report: 1990–2014. https://19january2017snapshot.epa.gov/ghgemissions/us-greenhouse-gas-inventory-report-1990-2014_.html (accessed September 2017).

million people[1]. As a result, California's per capita GHG emissions have decreased over the last 14 years from 14 to 11.3 tonnes of CO_2e per person.[2] In 2015, emissions continued to decrease for the electric power sector. Emissions from all other sectors remained relatively flat or increased slightly from 2014.[3]

The ARB estimates that transportation was the source of approximately 37 percent of the State's GHG emissions in 2015, followed by industrial sources at 21 percent, and electricity generation (both in-state and out-of-state) at 19 percent. The remaining sources of GHG emissions are residential and commercial activities at 9 percent, agriculture at 8 percent, high GWP gases at 4 percent, and recycling and waste at 2 percent.[4]

The ARB staff has projected statewide Business as Usual (BAU) GHG emissions for 2020, which represent the emissions that would be expected to occur in the absence of any GHG reduction actions, at 509.4 MMT CO_2e.[5] GHG emissions from the transportation and electricity sectors as a whole are expected to be approximately 36 percent and 20 percent of total CO_2e emissions, respectively. The industrial sector consists of large stationary sources of GHG emissions, and the percentage of the total 2020 emissions is projected to be 18 percent of total CO_2e emissions. The remaining sources of GHG emissions in 2020 are high GWP gases at approximately 6 percent, residential and commercial activities at 10 percent, agriculture at 7 percent, and recycling and waste at 2 percent.[6]

City of Santee Emissions. The Sustainable Santee Plan (Sustainability Plan) includes a GHG baseline inventory that identifies sources and levels of GHG emissions produced by residents and businesses within the community and municipal operations. The 2005 and 2013 inventories address the following emission sectors: on-road transportation, residential energy, commercial energy, solid waste, water use, off-road sources, and wastewater treatment. Government-related GHG emissions, which include energy use in government buildings and facilities, vehicle fleets and equipment, solid waste, streetlights, employee commutes, and water pumping, are a subset of the communitywide emissions inventory.

Communitywide GHG emissions were also projected for the years 2020, 2030, and 2035 under a BAU scenario. The BAU scenario assumes that historical data and trends are representative of future year consumption rates for energy, water, and waste. A summary of the City's 2013, 2020, 2030, and 2035 BAU emissions is provided in Table 4.4.B. Assuming that the same type of current

1 California Department of Finance. 2017. E-4 Population Estimates for Cities, Counties, and the State 2011–2017 with 2010 Census Benchmark. Website: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-4/2010-17/ (accessed September 05, 2017).

2 California Air Resources Board. 2017. California GHG Emission Inventory. Website: https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2015/ghg_inventory_trends_00-15.pdf.

3 California Air Resources Board. 2017. California Greenhouse Gas Emissions for 2000 to 2015 – Trends of Emissions and Other Indicators. https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2015/ghg_inventory_trends_00-15.pdf, accessed August 2017.

4 Ibid.

5 California Air Resources Board. 2014. 2020 Business-as-Usual (BAU) Emissions Projection: 2014 Edition. Website: https://www.arb.ca.gov/cc/inventory/data/bau.htm (accessed August 30, 2017).

6 California Air Resources Board. 2014. 2020 BAU Forecast, Version May 27, 2014. Website: https://www.arb.ca.gov/cc/inventory/data/tables/2020_bau_forecast_by_scoping_category_2014-05-22.pdf (accessed August 30, 2017).

emissions-generating practices continue to occur within the City, GHG emissions are anticipated to increase by 7.6 percent in 2020 over 2013 levels, by 21 percent in 2030 over 2013 levels, and by 28 percent in 2035 over 2013 levels.

Table 4.4.B: City of Santee Baseline GHG Emissions and Percent Contributions

Emissions Sector	Baseline MT CO_2e (percent of total emissions)				
	2005	2013	2020	2030	2035
On-Road Transportation	181,812 (53%)	242,499 (60%)	264,162 (61%)	298,992 (62%)	318,334 (62%)
Commercial Energy Use	37,697 (11%)	48,025 (12%)	49,467 (11%)	56,486 (12%)	60,362 (12%)
Residential Energy Use	63,544 (19%)	78,651 (20%)	83,753 (19%)	91,986 (19%)	96,401 (19%)
Solid Waste	16,376 (4.8%)	11,151 (2.8%)	11,861 (2.7%)	12,651 (2.6%)	13,066 (2.5%)
Water &Wastewater	12,313(3.6%)	7,549 (1.8%)	8,029 (1.9%)	8,565 (1.8%)	8,845 (1.7%)
Off-Road Sources	28,230 (8.3%)	14,699 (3.7%)	15,710 (3.6%)	17,490 (3.6%)	18,454 (3.6%)
Total	**339,972 (100%)**	**402,574 (100%)**	**432,982 (100%)**	**486,170 (100%)**	**515,462 (100%)**
Estimated Population	54,370	55,033	59,488	62,145	63,518
Estimated Employment	15,782	16,630	16,949	19,354	20,682
GHG Emissions per Service Population [a]	4.85	5.62	5.66	5.97	6.12

Note: [a] Service Population is the sum of population plus employment.
Source: City of Santee, Draft *Sustainable Santee Plan*, February 2019.

Transportation emissions are the largest portion of GHG emissions (with the exception of Residential Energy Use in 2020 forecast). The magnitude of GHG emissions increases from 2008 to 2020, 2030, and 2035 is due primarily to anticipated future population growth (and related consumption) in the City. Although the trends for each projection show an increase in GHG emissions, emission reductions are anticipated due to programs and regulations applied at the federal and State levels, such as vehicle fuel efficiency standards, low carbon fuel standards, and renewable energy portfolio requirements. These actions at the federal and State levels are not considered in the 2020, 2030, and 2035 projections.

Table 4.4.C summarizes municipal baseline emissions.

Table 4.4.C: City of Santee Baseline Municipal Emissions

Emissions Sector	Baseline MT CO_2e (percent of total emissions)				
	2005	2013	2020	2030	2035
Fleet & Equipment	359 (22%)	396 (21%)	404 (21%)	416 (21%)	421 (21%)
Buildings & Facilities	275 (17%)	346 (18%)	353 (18%)	363 (18%)	368 (18%)
Solid Waste	210 (13%)	247 (13%)	252 (13%)	259 (13%)	263 (13%)
Employee Commute	208 (13%)	188 (10%)	192 (10%)	197 (10%)	200 (10%)
Outdoor Lights	586 (35%)	702 (37%)	716 (21%)	737 (21%)	747 (21%)
Water Pumping	19 (1.1%)	30 (1.6%)	31 (1.5%)	31 (1.6%)	32 (1.5%)
Total	**1,657 (100%)**	**1,909 (100%)**	**1,948 (100%)**	**2,003 (100%)**	**2,031 (100%)**

Source: City of Santee, Draft *Sustainable Santee Plan*, February 2019.

4.4.3.2 Effects of Global Warming

Effects from global climate change may arise from temperature increases, climate-sensitive diseases, extreme weather events, and air quality. There may be direct temperature effects through increases in average temperature leading to more extreme heat waves and less extreme cold spells. Those living in warmer climates are likely to experience more stress and heat-related problems. Heat-related problems include heat rash and heat stroke. In addition, climate-sensitive diseases may increase, such as those spread by mosquitoes and other disease-carrying insects. Such diseases include malaria, dengue fever, yellow fever, and encephalitis. Extreme events such as flooding and hurricanes can displace people and agriculture, which would have negative consequences. Global warming may also contribute to air quality problems from increased frequency of smog and particulate air pollution. Table 4.4.D lists greenhouse gases, the effects of each greenhouse gas, and sources for each of the greenhouse gases.

Table 4.4.D: Greenhouse Gas Properties, Effects, and Sources

Constituent	Description and Physical Properties	Health Effects	Sources
Water Vapor	Water vapor (H_2O) is the most abundant, important, and variable greenhouse gas in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization.	There are no health effects from water vapor. When some pollutants come in contact with water vapor, they can dissolve and then the water vapor can be a transport mechanism to enter the human body.	The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.
Carbon Dioxide	Carbon dioxide (CO_2) is an odorless, colorless natural greenhouse gas.	Outdoor levels of carbon dioxide are not high enough to result in negative health effects.	Carbon dioxide is emitted from natural and anthropocentric (human) sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic out gassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood.
Methane	Methane (CH_4) is an extremely effective absorber of radiation, though its atmospheric concentration is less than carbon dioxide and its lifetime in the atmosphere is brief (10–12 years) compared to other greenhouse gases.	There are no health effects from methane.	Methane has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other

Table 4.4.D: Greenhouse Gas Properties, Effects, and Sources

Constituent	Description and Physical Properties	Health Effects	Sources
			anthropocentric sources include fossil-fuel combustion and biomass burning.
Nitrous Oxide	Nitrous oxide (N_2O), also known as laughing gas, is a colorless greenhouse gas.	Nitrous oxide can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses it is harmless. In some cases, heavy and extended use can cause Olney's Lesions (brain damage).	Concentrations of nitrous oxide also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 ppb. Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, e.g., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars.
Chloro-fluorocarbons	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface).	In confirmed indoor locations, working with CFC-113 or other CFCs is thought to have resulted in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.	CFCs have no natural source, but were first synthesized in 1928. They were used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CECs will remain in the atmosphere for over 100 years.
Hydro-fluorocarbons	Hydrofluorocarbons (HFCs) are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the greenhouse gases, they are one of three groups with the highest global warming potential. Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant.	None.	HFCs are manmade for applications such as automobile air conditioners and refrigerants.

Table 4.4.D: Greenhouse Gas Properties, Effects, and Sources

Constituent	Description and Physical Properties	Health Effects	Sources
Per-fluorocarbons	Perfluorocarbons (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6).	None.	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.
Sulfur Hexafluoride	Sulfur hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated, 23,900. Concentrations in the 1990s were about 4 ppt.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.	Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.
Aerosols	Aerosols are particles emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light. Cloud formation can also be affected by aerosols.	Similar health effects associated with particulate matter.	Sulfate aerosols are emitted when fuel containing sulfur is burned. Another source of aerosols (in the form of black carbon or soot) is the result of incomplete combustion or the incomplete burning of fossil fuels. Although particulate matter regulation has been lowering aerosol concentrations in the United States, global concentrations are likely increasing as a result of other sources around the world.

Source: LSA, November 2011

Additionally, according to the 2006 California Climate Action Team Report,[1] the following climate change effects, which are based on trends established by the United Nations Intergovernmental Panel on Climate Change (IPCC), can be expected in California over the course of the next century:

- A diminishing Sierra snowpack declining by 70 percent to 90 percent, threatening the state's water supply;
- Increasing temperatures from 8 to 10.4 degrees Fahrenheit under the higher emission scenarios, leading to a 25 percent to 35 percent increase in the number of days ozone pollution levels are exceeded in most urban areas;
- Increased vulnerability of forests due to pest infestation and increased temperatures;
- Increased electricity demand, particularly in the hot summer months; and
- Increased ground-level ozone formation due to higher reaction rates of ozone-precursors.

[1] California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.

Changes in climate have the potential to affect fire regimes, especially in areas where climate, and not fuel, tends to be the limiting factor. A number of studies have been conducted on the likely effects of climate change on present-day fire regimes. In temperate regions, including the western United States, there is a possibility that increased temperature would extend typical fire seasons, with more fires occurring earlier and later in a given year. There is also a possibility that global warming would foster the creation of faster, hotter fires that would be more difficult to contain and therefore affect larger areas potentially leading to an increase in both the annual area burned and the number of potential catastrophic fires. Although the effects will vary considerably among different ecosystem types, the total area burned will likely increase in some regions. Other factors such as levels of carbon dioxide in the atmosphere may do more than change regimes through weather effects. Greater carbon dioxide availability may also lead to changes in plant growth and decomposition, which can have an impact on fire. However, it is important to realize that a single major fire event can have far greater consequences than small changes in temperature or rainfall over a period of decades. Similarly, the year-to-year and seasonal variations can be far greater than the small gradual changes of long-term climate change.

Climate change also leads to a rise in average global temperature, changes in frequency and distribution of precipitation, and variations in the pattern and occurrence of droughts, floods, and sea level rise. Specifically, it is thought that global climate change impacts to the southwest region of the U.S. would result in an increased frequency of intense precipitation events and the increased risk of flash floods. However, many of the existing hydrologic modeling systems have significant data gaps or are designed to achieve specific accounting goals. As a result, many of the modeling procedures and modeling data are fragmented, poorly integrated, and unable to meet the predictive challenges of a rapidly changing climate.

Without reliable data to assess impacts of flooding associated with global climate change to any degree of specificity, it is not possible to discern the extent to which the flooding area would change or the frequency at which flooding would occur. Regardless of the potential for an increase in flood events, development in the existing flood areas are already designed to limit impacts to flood related events. These design features include the use of materials resistant to flood damage, the placement of drainage paths around structures to guide floodwaters around and away from proposed structures, and the placement of the lowest floor of any structure at or above the base flood elevation.

4.4.4 Regulatory Setting

4.4.4.1 Federal Regulation of Climate Change

The U.S. Supreme Court ruled in *Massachusetts v Environmental Protection Agency*, 549 U.S. 497, 127 S.Ct.1438 (2007), that carbon dioxide and other GHGs and pollutants must be regulated under the CAA if the EPA determines they pose an endangerment to public health and welfare. At this time, however, no federal legislation or regulations have been enacted specifically addressing GHG emissions reductions and climate change. On December 7, 2009, the EPA Administrator signed a final action with two distinct findings regarding greenhouse gases under Section 202(a) of the CAA:

- The Administrator is proposing to find that the current and projected concentrations of the mix of six key greenhouse gases—CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threatened

the public health and welfare of current and future generations. This is referred to as the endangerment finding.

- The Administrator is further proposing to find that the combined emissions of CO_2, CH_4, N_2O, and HFCs from new motor vehicles and motor vehicle engines contributed to the atmospheric concentrations of these key GHGs and hence to the threat of GCC. This is referred to as the cause or contribute finding.

This EPA action does not impose any requirements on industry or other entities. However, these findings are a prerequisite to finalizing the greenhouse gas emission standards for light-duty vehicles noted below.

On April 1, 2010, the EPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a final joint rule to establish a national program consisting of new standards for model year 2012–2016 light-duty vehicles that would reduce GHG emissions and improve fuel economy. The EPA is finalizing the first-ever national GHG emissions standards under the CAA, and NHTSA is finalizing Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. The EPA GHG standards required these vehicles to meet an estimated combined average emissions level of 250 grams of CO_2 per mile in model year 2016, equivalent to 35.5 mpg.[1] By model year 2014, many program goals were being achieved, with the average new vehicle fuel economy at 30.7 mpg.[2]

4.4.4.2 State Regulation of Climate Change

California Air Resources Board. The ARB is part of the California EPA and is responsible for coordination and administration of State and federal air quality programs in California. The main goals of the ARB include protecting the public from toxic air contaminants, providing solutions for complying with air pollution rules and regulations, and attaining and maintaining healthy air quality for the State. The ARB defines emissions standards for vehicles, as well as other commercial equipment, and several consumer products within the State. The ARB also works with both the federal government and local air quality districts to develop California's SIP.

In the 2017 Climate Change Scoping Plan Update, the ARB proposes strategies for achieving the California 2030 GHG target, established by Senate Bill 32 (SB 32). For local governments, such as the City of Santee, the update recommends a communitywide goal of no more than 6 MT CO_2e per capita by 2030, and no more than 2 MT CO_2e per capita by 2050. These goals are consistent with the 2030 Target Scoping Plan and the State's long-term goals.

Assembly Bill 1493. In a response to the transportation sector's significant contribution to California's CO_2 emissions, AB 1493 (Pavley) was enacted on July 22, 2002. AB 1493, now Health and

[1] United States Environmental Protection Agency. *EPA and NHTSA Finalize Historic National Program to Reduce Greenhouse Gases and Improve Fuel Economy for Cars and Trucks.* Available at: http://www.epa.gov/otaq/climate/regulations/420f10014.pdf, last accessed February 2012.

[2] United States Environmental Protection Agency. 2016. Draft Technical Assessment Report: Midterm Evaluation of Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards for Model Years 2022–2025. Website: https://nepis.epa.gov/Exe/ZyPDF.cgi/P100OXEO.PDF?Dockey=P100OXEO.PDF (accessed August 30, 2017).

Safety Code Section 43018.5, requires the ARB to set GHG emission standards for passenger vehicles and light-duty trucks (and other vehicles whose primary use is noncommercial personal transportation in the State) manufactured in 2009 and all subsequent model years. The ARB adopted the standards in September 2004. When fully phased in, the near-term (2009–2012) standards will result in a reduction of approximately 22 percent in GHG emissions compared to the emissions from the 2002 fleet, while the midterm (2013–2016) standards will result in a reduction of approximately 30 percent.

Senate Bill 1078. Approved by Governor Davis in September 2002, Senate Bill (SB) 1078 established the Renewal Portfolio Standard program, which requires an annual increase in renewable generation by the utilities equivalent to at least 1 percent of sales, with an aggregate goal of 20 percent by 2017. This goal was subsequently accelerated, requiring utilities to obtain 20 percent of their power from renewable sources by 2010 (see SB 107) (see also Executive Order [EO] S-14-08).

Executive Order S-3-05. In June 2005, Governor Schwarzenegger established California's GHG emissions reduction targets in EO S-3-05. This EO established the following goals for the State of California: GHG emissions should be reduced to 2000 levels by 2010; GHG emissions should be reduced to 1990 levels by 2020; and GHG emissions should be reduced to 80 percent below 1990 levels by 2050. The Secretary of CalEPA is required to coordinate efforts of various agencies in order to collectively and efficiently reduce GHGs. Representatives from several state agencies comprise the Climate Action Team (CAT). The CAT is responsible for implementing global warming emissions reduction programs. The CAT fulfilled its report requirements through the March 2006 CAT Report to Governor Schwarzenegger and the legislature (CalEPA 2006). As of the date of this EIR, subsequent CAT reports have been released for 2009 and 2010.

Senate Bill 107. Approved by Governor Schwarzenegger on September 26, 2006, SB 107 requires investor-owned utilities, such as Pacific Gas and Electric, Southern California Edison, and San Diego Gas and Electric, to generate 20 percent of their electricity from renewable sources by 2010. Previously, State law required that this target be achieved by 2017 (see SB 1078).

Assembly Bill 32. California's major initiative for reducing GHG emissions is outlined in AB 32, the "California Global Warming Solutions Act of 2006." AB 32, now Health and Safety Code Section 38500 et seq., required ARB to:

- Establish a statewide GHG emissions cap for 2020, based on 1990 emissions, by January 1, 2008;
- Adopt mandatory reporting rules for significant sources of GHG emissions by January 1, 2008;
- Adopt an emissions reduction plan by January 1, 2009, indicating how emissions reductions will be achieved via regulations, market mechanisms, and other actions;
- Adopt regulations to achieve the maximum technologically feasible and cost-effective reductions of GHGs by January 1, 2011; and
- Prepare a Scoping Plan outlining the State's strategy to achieve the 2020 GHG emissions limit.

The ARB has established that the level of annual GHG emissions in 1990 was 427 MMT of CO_2e.[1] The emissions target of 427 MMT of CO_2e/year requires the reduction of 80 MMT from the State's projected BAU 2020 emissions of 507 MMT[2] (i.e., the 1990 levels are approximately 30 percent below BAU). BAU is a forecast of the California economy in 2020 without implementation of any of the GHG reduction measures identified in the Scoping Plan.

The Scoping Plan was approved by the ARB on December 11, 2008, and includes measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures.[3] More specifically, the Scoping Plan includes aggressive energy efficiency goals and methods for increasing renewable energy use. Meeting the goals in the Scoping Plan will require expanded utility-based energy efficiency programs, more stringent building and appliance standards, green building practices, waste reduction, and innovative strategies that go beyond traditional approaches. The Scoping Plan also relies on expanded efforts by the California Energy Commission (CEC) and California Public Utilities Commission (CPUC).

In August 2011, the Scoping Plan was reapproved by the ARB and included the Final Supplement to the Scoping Plan Functional Equivalent Document (FED). Emission reductions projected to result from the recommended measures in the Scoping Plan were sufficient to attain the emissions goal of 427 MMT of CO_2e by 2020. The Scoping Plan includes a range of GHG reduction actions that may include direct regulations, alternative compliance mechanisms, monetary and nonmonetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. The Scoping Plan, which must be updated every five years, was first updated in February 2014, and approved by the Board on May 22, 2014.[4]

In addition to reducing GHG emissions to 1990 levels by 2020, AB 32 directed the ARB and the CAT[5] to identify a list of "discrete early action GHG reduction measures" that could be adopted and made enforceable by January 1, 2010. On January 18, 2007, Governor Schwarzenegger signed EO S-1-07, further solidifying California's dedication to reducing GHGs by setting a new Low Carbon Fuel Standard. This EO sets a target to reduce the carbon intensity of California transportation fuels by at least 10 percent by 2020 and directs the ARB to consider the Low Carbon Fuel Standard as a discrete early action measure. The ARB adopted the implementing regulation in April 2009. The regulation is expected to increase the production of biofuels, including those from alternative sources such as algae, wood, and agricultural waste. In addition, the Low Carbon Fuel Standard would drive the availability of plug-in hybrid, battery electric, and fuel-cell power motor vehicles. The Low Carbon Fuel Standard is anticipated to replace 20 percent of the fuel used in motor vehicles with alternative fuels by 2020.

1 California Air Resources Board. California 1990 Greenhouse Gas Emissions Level and 2020 Limit. Available at: http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm, last accessed February 2012.

2 California Air Resources Board. Greenhouse Gas Inventory – 2020 Emissions Forecast. Available at: http://www.arb.ca.gov/cc/inventory/data/forecast.htm, last accessed February 2012.

3 California Air Resources Board. 2008. *Climate Change Proposed Scoping Plan: a Framework for Change*. October 2008.

4 California Air Resources Board. 2017. *AB 32 Scoping Plan.* Website: https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm (accessed August 30, 2017).

5 The CAT is a consortium of representatives from State agencies that has been charged with coordinating and implementing GHG emission reduction programs that fall outside of the ARB's jurisdiction.

In June 2007, the ARB approved a list of 37 early action measures, including three discrete early action measures (Low Carbon Fuel Standard, Restrictions on High Global Warming Potential Refrigerants, and Landfill Methane Capture). Discrete early action measures are measures that were required to be adopted as regulations and made effective no later than January 1, 2010, the date established by Health and Safety Code (HSC) Section 38560.5. The ARB adopted an additional six early action measures in October 2007.[1] These measures relate to truck efficiency, port electrification, reduction of PFCs from the semiconductor industry, reduction of propellants in consumer products, proper tire inflation, and SF_6 reductions from the non-electricity sector. The combination of early action measures is estimated to reduce statewide GHG emissions by nearly 16 MMT.[2]

Senate Bill 1368. In September 2006, Governor Schwarzenegger signed SB 1368 (now Public Utilities Code Section 8340), which requires the CEC to develop and adopt regulations for GHG emissions performance standards for the long-term procurement of electricity by local publicly owned utilities. These standards must be consistent with the standards adopted by the CPUC. This effort will help to protect energy customers from financial risks associated with investments in carbon-intensive generation by allowing new capital investments in power plants whose GHG emissions are as low as or lower than new combined-cycle natural gas plants, by requiring imported electricity to meet GHG performance standards in California and requiring that the standards be developed and adopted in a public process.

Senate Bill 97. To assist public agencies in analyzing the effects of GHGs under *CEQA Guidelines*, SB 97 (Chapter 185, 2007) required the OPR to develop *CEQA Guidelines* on how to minimize and mitigate a project's GHG emissions. On December 30, 2009, the Natural Resources Agency adopted *CEQA Guideline Amendments* related to climate change. These amendments became effective on March 18, 2010. The amended guidelines establish several new *CEQA Guidelines* requirements concerning the analysis of GHGs, including:

- Requiring a lead agency to "make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project" (Section 15064(a))
- Providing a lead agency with the discretion to determine whether to use quantitative or qualitative analysis or performance standards to determine the significance of GHG emissions resulting from a particular project (Section 15064.4(a))
- Requiring a lead agency to consider the following factors when assessing the significant impacts from GHG emissions on the environment:
    - The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.

[1] California Air Resources Board. 2007. *Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration*. October 2007.

[2] California Air Resources Board. 2007. "ARB approves tripling of early action measures required under AB 32." News Release 07-46. October 25. Available at: http://www.arb.ca.gov/newsrel/nr102507.htm, last accessed February 2012.

- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional or local plan for the reduction or mitigation of GHG emissions. (Section 15064.4(b))

- Allowing lead agencies to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures, including offsets that are not otherwise required (Section 15126.4(c)).

The amended guidelines also establish two new guidance questions regarding GHG emissions in the Environmental Checklist set forth in Appendix G to the *CEQA Guidelines*:

- Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

The adopted amendments do not establish a GHG emission threshold, and instead allow a Lead Agency to develop, adopt, and apply its own thresholds of significance or to apply those developed by other agencies or experts.[1] The Natural Resources Agency also acknowledges that a Lead Agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions.[2]

Senate Bill 375. Senate Bill 375, signed into law on October 1, 2008, is intended to enhance the ARB's ability to reach AB 32 goals by directing it to develop regional greenhouse gas emission reduction targets to be achieved within the automobile and light truck sectors for 2020 and 2035. The targets are required to consider the emission reductions associated with vehicle emission standards (see Senate Bill 1493), the composition of fuels (see Executive Order S-1-07), and other ARB-approved measures to reduce GHG emissions. In late September 2010, the ARB announced greenhouse gas reduction goals for implementation by regional land use and transportation agencies. Table 4.4.E shows the 2010 reduction goals that were effective through September 30, 2018 as well as updated goals effective October 1, 2018, ~~as well as the ARB proposed updates from June 2017. These updated targets will take effect in 2018, if approved~~. As shown below, the regional emissions reduction goal for San Diego is ~~7~~ 15 percent by 2020 and ~~16~~ 19 ~~percent (19 percent proposed)~~ by 2035 compared to 2005 emissions levels.

[1] The *CEQA Guidelines* do not establish thresholds of significance for other potential environmental impacts, and SB 97 did not authorize the development of a statement threshold as part of this *CEQA Guidelines* update. Rather, the proposed amendments recognize a Lead Agency's existing authority to develop, adopt and apply their own thresholds of significance or those developed by other agencies or experts." *Final Statement of Reasons for Regulatory Action, Amendments to the CEQA Guidelines*, p. 84.

[2] "A project's compliance with regulations or requirements implementing AB 32 or other laws and policies is not irrelevant. Section 15064.4(b)(3) would allow a Lead Agency to consider compliance with requirements and regulations in the determination of significance of a project's greenhouse gas emissions." *Final Statement of Reasons*, p. 100.

Table 4.4.E: ARB SB 375 Reduction Goals

Region	By 2020 (percent)		By 2035 (percent)	
	September 2010	October 2018	September 2010	October 2018
San Francisco Bay Area	7	10	15	19
San Diego	7	15	13	19
Sacramento	7	7	16	19
Central Valley/San Joaquin	5	5-13	10	13-16
Los Angeles/Southern California	8	8	13	19

ARB = California Air Resources Board
SB = Senate Bill 375

The ARB will work with California's 18 metropolitan planning organizations to align their regional transportation, housing, and land use plans and prepare a "Sustainable Communities Strategy" within the Regional Transportation Plan to reduce the number of vehicle miles traveled in their respective regions and demonstrate the region's ability to attain its greenhouse gas reduction targets. If a Sustainable Communities Strategy is unable to achieve the greenhouse gas reduction target, an MPO must prepare an Alternative Planning Strategy demonstrating how the greenhouse gas reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. Senate Bill 375 provides incentives for streamlining *CEQA Guidelines* requirements by substantially reducing the requirements for "transit priority projects," as specified in Senate Bill 375, and eliminating the analysis of the impacts of certain residential projects on global warming and the growth-inducing impacts of those projects when the projects are consistent with the Sustainable Communities Strategy or Alternative Planning Strategy.

Executive Order S-13-08. In November 2008, Governor Schwarzenegger approved and signed Executive Order S-13-08, the Climate Adaptation and Sea Level Rise Planning Directive. This Order requires the California Natural Resources Agency, in coordination with local, regional, State, and federal public and private entities to develop a state Climate Adaptation Strategy. The report is developed to assess vulnerability and outline possible solutions for State agencies to address climate resiliency.

Senate Bill X1-2. On April 12, 2011, Governor Jerry Brown signed Senate Bill X1-2. This bill supersedes the 33 percent by 2020 Renewable Portfolio Standard (RPS), created by Executive Order S-14-08 that Gov. Arnold Schwarzenegger previously signed. The RPS required that all retail suppliers of electricity in California serve 33 percent of their load with renewable energy by 2020. A number of significant changes are made in Senate Bill X1-2:

- Senate Bill X12 extends application of the RPS to all electric retailers in the state, including municipal and public-owned utilities, and community choice aggregators.
- Senate Bill X1 2 creates a three-stage compliance period for electricity providers to meet renewable energy goals: 20 percent of retail sales must be renewable energy products by 2013, 25 percent of retail sales must be renewable energy products by 2016, and 33 percent of retail sales must be renewable energy products by 2020. The 33 percent level must be maintained in the years that follow.

- This three-stage compliance period requires the RPS to be met increasingly with renewable energy that is supplied to the California grid and is located within or directly proximate to California. Senate Bill X1 2 mandates that renewables from this category make up:
  - At least 50 percent for the 2011–2013 compliance period.
  - At least 65 percent for the 2014–2016 compliance period.
  - At least 75 percent for 2016 and beyond.
- Senate Bill X1 2 sets rules for the use of Renewable Energy Credits (RECs):
  - Establishes a cap of no more than 25 percent unbundled RECs going toward the RPS between 2011 and 2013, 15 percent from 2014 to 2016, and 10 percent thereafter.
  - Does not allow for the grandfathering of Tradable REC contracts executed before 2010, unless the contract was (or is) approved by the CPUC.
  - Allows banking of RECs for three years only.
  - Allows Energy Service Providers, CCAs, and IOUs with 60,000 or fewer customers to use 100 percent RECs to meet the RPS.

Senate Bill X1 2 also eliminates the Market Price Referent (MPR), which was a benchmark to assess the above-market costs of RPS contracts based on the long-term ownership, operating, and fixed-price fuel costs for a new 500 megawatt (mW) natural gas-fired combined cycle gas turbine. Using the MPR, the CPUC would provide above-market funds to cover contract costs that exceeded the MPR requires the CPUC to establish a cost limit for each IOU, and authorizes IOUs to stop procuring renewable energy beyond the cost limit. It also requires the CPUC to adopt a standard tariff for renewable projects up to 3 mW in size, with a 750 mW statewide cap on eligibility for the tariff.

Executive Order S-21-09. On September 15, 2009, Governor Schwarzenegger issued Executive Order S-21-09. This Executive Order directed the ARB to adopt a regulation consistent with the goal of Executive Order S-14-08 by July 31, 2010. On September 23, 2010, the ARB adopted the Renewable Electricity Standard (RES) to require a 33 percent by 2020 renewable energy procurement mandate for most retail sellers of electricity in California.[1]

California Code of Regulations Title 24. CCR Title 24, part 11 (California's Green Building Standard Code) was adopted by the California Building Standards Commission in 2010 and became effective in January 2011. The Code applies to all new constructed residential, nonresidential, commercial, mixed-use, and State-owned facilities, as well as schools and hospitals. CALGreen Code comprises Mandatory Residential and Nonresidential Measures and more stringent Voluntary Measures (TIERs I and II).

Mandatory Measures are required to be implemented on all new construction projects and consist of a wide array of green measures concerning project site design, water use reduction, improvement of indoor air quality, and conservation of materials and resources. The CALGreen Building Code

[1] California Air Resources Board. *News Release: California commits to more clean, green energy.* Available at: http://www.arb.ca.gov/newsrel/newsrelease.php?id=155, last accessed February 2012. Also refer to Title 17, Cal. Code Regs., § 97004(a).

refers to Title 24, Part 6 compliance with respect to energy efficiency; however, it encourages 15 percent energy use reduction over that required in Part 6. Voluntary Measures are optional. More stringent measures that may to be used by jurisdictions that strive to enhance their commitment towards green and sustainable design and achievement of Assembly Bill 32 goals are listed. Under Tiers I and II, all new construction projects are required to reduce energy consumption by 15 percent and 30 percent, respectively, below the baseline required under the CEC, as well as implement more stringent green measures than those required by mandatory code. Title 24, Part 6 energy efficiency standards are updated every three years. The recent update to Title 24, Part 6 increased the energy efficiency of buildings by an additional seven percent compared to the 2016 standards and require construction of new residential units to include photovoltaic (PV) solar. These new requirements become effective January 1, 2020.

Senate Bill 32. On September 08, 2016, Governor Brown approved Senate Bill 32. The bill codifies the 2030 GHG emissions reduction target of 40 percent below 1990 levels, which was written into Executive Order B-30-15. The bill went into effect on January 1, 2017, and will require ARB to update the Scoping Plan to reflect the new target.[1]

4.4.4.3 Regional Regulation of Climate Change

San Diego Association of Governments. SANDAG is the Regional Transportation Commission and federally designated MPO for the San Diego region. SANDAG builds consensus, develops strategic plans, obtains and allocates resources, and provides information on a broad range of topics pertinent to the region's quality of life. As a regional Council of Governments, voting members of the association consist of the County of San Diego and the 18 cities in the region.

Regional Comprehensive Plan. The Regional Comprehensive Plan (RCP) was adopted by the SANDAG Board of Directors in 2004 and serves as the long-regional planning framework for the San Diego region. It provides a broad context in which local and regional decisions can be made that move the region toward a sustainable future with more choices and opportunities for all residents of the region. It sets forth a regional strategy to promote smarter growth, focusing on locating higher-density and mixed-use development close to existing and planned transportation infrastructure. This strategy focuses particularly on elevating the role of public transit in people's daily lives. The RCP is based upon three themes:

- Improving the connections between land use and transportation plans by using smart growth principles;
- Using land use and transportation plans to guide decisions about environmental and public facility investments; and
- Focusing on collaboration and incentives to achieve regional goals and objectives.

The RCP better integrates local land use and transportation decisions, and focuses attention on where and how to grow. The RCP contains an incentive-based approach to encourage and channel

[1] California Legislative Information. 2016. SB-32 California Global Warming Solutions Act of 2006: emissions limit. Website: https://leginfo.legislature.ca.gov/faces/billStatusClient.xhtml?bill_id=201520160SB32 (accessed September 5, 2017).

growth into existing and future urban areas and smart growth communities. The RCP identifies certain areas in the region as Smart Growth Opportunity Areas (SGOA). Designation of these opportunity areas is intended to provide guidance to local governments, property owners, and service providers as to where smart growth development should occur from a regional perspective, and focuses attention on these areas as local jurisdictions update their general plans and redevelopment plans. Once these areas are designated by local jurisdictions for development types, densities, and intensities consistent with the goals of this Plan, transportation facility improvements and other infrastructure will be targeted to these areas.

Regional Transportation Plan and Sustainable Communities Strategy. The SANDAG Board of Directors adopted the 2050 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) on October 28, 2011. The 2050 RTP maps out a system designed to maximize transit enhancements, integrate biking and walking elements, and promote programs to reduce demand and increase efficiency. The RTP includes the SCS that integrates how we use land, develop housing, and plan transportation. Pursuant to SB 375, each MPO is required to adopt an SCS as part of its RTP and, using the most recent planning assumptions, demonstrate achievement of the targets for reduction of GHGs. The 2050 RTP/SCS outlines projects for rail and bus services, highways, local streets, bicycling, and walking, as well as systems and demand management. The 2050 RTP/SCS shows how the region will meet the GHG targets for passenger cars and light-duty trucks established by the ARB for 2020 and 2035 by using land in a way that makes development more compact, conserving open space, and investing in a transportation network that reduces VMT and gives residents alternative transportation options.

San Diego Forward: The Regional Plan. The SANDAG Board of Directors adopted the San Diego Forward plan on October 9, 2015. This plan updates of the Regional Comprehensive Plan for the San Diego Region (RCP), updates the Regional Transportation Plan and updates the Sustainable Communities Strategy and combines these documents into one plan. The plan identifies the general location of uses, residential densities, and building densities within the region. It sets forth a forecasted transportation network and development pattern. Goals for this plan include reduced GHG emissions and improved air quality by creating transportation alternatives to the car.

San Diego Air Pollution Control District. The SDAPCD is the agency principally responsible for comprehensive air pollution control in the SDAB. The SDAPCD addresses GHG emissions and climate change through the implementation of federal and State regulations such as the EPA GHG Tailoring Rule and Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills. The SCAPCD also participates in regional initiatives to address GHG emissions. The SDAPCD has participated in the Climate Initiative Vision Action Team to help catalyze comprehensive local action on climate change in the San Diego area, and in the development of SANDAG's SCS. The SDAPCD has also provided expertise to local governments developing Climate Action Plans (CAPs) including County of San Diego and City of San Diego.

Regional Air Quality Strategy. The RAQS was adopted by the SDAPCD Board in 1992, and was most recently revised in 2016. The RAQS relies on information from the ARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then establishes the strategies necessary for the reduction of emissions through regulatory controls. The ARB mobile source emission projections and SANDAG

growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County as part of the development of their general plans.

Air Quality Management Plan. The applicable air quality plans are the SIP and RAQS. As discussed above, the SIP includes strategies and tactics to be used to attain and maintain acceptable air quality in the SDAB. The RAQS is a separate document that contains a list of strategies to maintain acceptable air quality.

4.4.5 Proposed Sustainable Santee Plan Goals and Measures

The following proposed Goals and Measures are applicable to the analysis of global climate change and greenhouse gas emissions:

- *Community GHG Reduction Strategies and Emission Reductions.*
    - Goal 1: Increase Energy Efficiency in Existing Residential Units.
        - 1.1: Energy Audits in the Existing Residential Sector ~~Energy Efficiency Education and Best Practices~~
        - ~~1.2: Increase Community Participation in Existing Energy Efficiency Opportunities~~
        - ~~1.3: Home Energy Evaluations~~
        - ~~1.4: Residential Home Energy Renovations~~
    - Goal 2: Increase Energy Efficiency in New Residential Units.
        - 2.1: ~~Energy Efficient Homes~~ Energy Efficiency Improvements of Residential Sector
    - Goal 3: Increase Energy Efficiency in Existing Commercial Units.
        - 3.1: Energy Audits in the Existing Sector ~~Energy Efficiency Training, Education, and Recognition in the Commercial Sector~~
        - ~~3.2: Increase Business Participation in Existing Energy Efficiency Programs~~
        - ~~3.3: Non-Residential Energy Audits~~
        - ~~3.4: Non-Residential Retrofits~~
    - Goal 4: Increase Energy Efficiency in New Commercial Units.
        - 4.1: Meet or Exceed Tier 2 Voluntary Measures Energy Efficiency Standards ~~Energy Efficient Businesses~~
    - ~~Goal 5: Increase Energy Efficiency through Water Efficiency.~~
        - ~~5.1: Water Efficiency through Enhanced Implementation of SB X7-7~~
        - ~~5.2: Exceed Water Efficiency Standards~~
    - Goal 5: Decrease Energy Demand through Reducing Urban Heat Island Effect.
        - 5.1: Tree Planting for Shading and Energy Efficiency
        - 5.2: Light-reflecting Surfaces for Energy Efficiency
        - ~~6.3: Carbon Sequestration through Preservation of Natural Lands~~
    - Goal 6: Decrease Greenhouse Gas Emissions through Reducing Vehicle Miles Traveled.
        - 6.1: Non-Motorized Transportation Options
        - 6.2: Implement Bicycle Master Plan to Expand Bike Routes around the City
        - ~~7.3: Ride Sharing Programs within Businesses~~
        - ~~7.4: Electrify the Fleet~~
        - ~~7.5: Complete Streets and Safe Routes to Schools Programs~~
        - ~~7.6: Reduce Vehicle Trips To/From School~~

- Goal 7: Increase Use of Electric Vehicles
  - 7.1 Electric Vehicle Charger Program
- Goal 8: Improve Traffic Flow
  - 8.1 Traffic Flow Improvement Program

- Goal ~~8~~9: Decrease Greenhouse Gas Emissions through Reducing Solid Waste Generation.
  - ~~8~~ 9.1: Reduce Waste to Landfills
- Goal ~~9~~ 10: Decrease Greenhouse Gas Emissions through Increasing Clean Energy Use.
  - ~~9~~ 10.1: Increase Distributed Renewable Energy Generation within the City of Santee ~~Clean Energy~~
  - ~~9~~ 10.2: Community Choice Aggregation Program
- ~~Goal 10: Decrease GHG Emissions from New Development through Performance Standards.~~
  - ~~10.1: Screening Tables~~

- *Municipal GHG Reduction Strategies and Emission Reductions*
  - Goal M-1: Increase Energy Efficiency in Municipal Buildings
    - M-1.1: Procurement Policy for Energy-Efficient Equipment
    - M-1.2 Install Cool Roofs
    - M-1.3 Retrofit HVAC and Water Pumping Equipment
  - Goal M-2: Increase Energy Efficiency in Community Buildings and Infrastructure
    - M-2.1: Traffic Signal and Outdoor Lighting Retrofits
  - Goal M 3: On-Road Energy Efficiency Enhancements; Employee Commute and Vehicle Fleet
    - M- 3.1: Employee Carpools
    - M-3.2: Purchase of Hybrid or Electric Vehicles
    - M3.3: Replace or Supplement Vehicle Fleet with Hybrid/Electric Vehicles
    - M3.4: Install E-Vehicle Chargers
  - Goal M-4: Reduce Energy Consumption in the Long Term
    - M-4.1: Ongoing Actions and Projected Reductions

- ~~*Municipal GHG Reduction Goal and Measures.*~~
  - ~~Goal M-1: Participate in Education, Outreach, and Planning Efforts for Energy Efficiency~~
    - ~~M-1.1: Increase Energy Savings through the SDG&E Energy Efficiency Partnership~~
  - ~~Goal M-2: Increase Energy Efficiency in Municipal Buildings~~
    - ~~M-2.1: Conduct Municipal Energy Audit~~
    - ~~M-2.2: Procurement Policy for Energy Efficient Equipment~~
    - ~~M-2.3: Install Cool Roofs~~
    - ~~M-2.4: Retrofit HVAC and Water Pump Equipment~~
  - ~~Goal M-3: Increase Energy Efficiency in Community Buildings and Infrastructure~~

~~M-3.1: Traffic Signal and Outdoor Lighting Retrofits~~
~~M-3.2: Upgrade or Incorporate Water-Conserving Landscape~~
~~M-3.3: Plant Trees for Shade and Carbon Sequestration~~

- ~~Goal M-4: On-Road Energy Efficiency Enhancements; Employee Commute and Vehicle Fleet~~
  ~~M-4.1: Employee Carpools~~
  ~~M-4.2: Purchase of Hybrid or Electric Vehicles~~
  ~~M-4.3: Replace and/or Supplement Vehicle Fleet with Hybrid/Electric Vehicles~~
  ~~M-4.4: Install E-Vehicle Chargers~~
- ~~Goal M-5: Reduce Energy Consumption in the Long Term~~
  ~~M-5.1: Ongoing Actions and Projected Reductions~~

Supporting Measures

- ☐ Designate a Sustainable Program Manager to oversee implementation of the Sustainable Santee Plan.
- ☐ Within six months of adoption of the Sustainable Santee Plan, establish a City webpage dedicated to the Sustainable Santee Plan that provides information to residents, businesses, and project applicants related to the plan, including but not limited to:
  - Financial incentives for reducing energy use, such as home upgrades through the HERO program, the California Solar Initiative, the Property-Assessed Clean Energy (PACE) program, and rainwater harvesting rebates;
  - Process for obtaining Tier 1 and Tier 2 Green Building Ratings such as LEED, Build It Green/Green Point Rating System, or Energy Star® certified buildings;
  - Programs and incentives to facilitate the installation of EV-chargers;
  - Updates to Title 24;
  - Measures and opportunities to reduce, reuse, and recycle waste;
  - Available ridesharing programs and school bus services and the benefits of both;
  - Programs and events in Santee promoting energy efficiency and sustainability;
  - Options for obtaining an energy audit for residences and businesses, such as through Energy Upgrade California;
  - Training opportunities offered by City, SDG&E and other entities on reducing energy and fuel use; and
  - Application of the Sustainable Santee Consistency Checklist for new development.
  - Application and tracking of the Screening Tables for new development
- ☐ Within six months of adoption of the Sustainable Santee Plan, establish an email recipient list for Santee residences, business, and interested persons to provide periodic email updates on the Sustainable Santee Plan and information on ways to facilitate its goals.
- ☐ On or before December 2020:
  - Establish online permitting to facilitate upgrades to residences and businesses;
  - Update the City's official street tree list to include more water-efficient varieties;

- Update the Zoning Ordinance to add clarity on desired recreational amenities in multifamily complexes to replace the previously desired pool and water features;
- Conduct a municipal energy audit, and continue to do so every two years, to inform City staff on municipal energy use and opportunities for improvement;
- Conduct a study to evaluate the feasibility of installing EV charging stations on City property;
- Upgrade or incorporate water-conserving landscape at City facilities, to the extent feasible; and
- Plant trees in City-owned spaces to reduce urban heat island effect and building energy use and increase carbon sequestration, to the extent feasible.

☐ Track energy efficiency retrofits of existing residential and commercial land uses within the City through the permit application process.

☐ Track LEED and Energy Star participation of new construction within the City through the permit application process.

Potential Impacts

The project is a policy document designed to reduce GHG emission in the City of Santee. All the project's Goals and Measures are designed towards achieving GHG reductions. The project as a policy document designed to reduce GHG emissions is important to keep in mind when assessing the potential impacts of the project. The Sustainable Santee Plan (SSP) does not propose new development or land uses. Rather, the SSP proposes reduction measures designed to reduce GHG emissions that would otherwise be emitted by the existing built environment and new development.

4.4.6 Impact Significance Criteria

The following thresholds are based on Appendix G of the *CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant impact related to global climate change if it would:

Threshold 4.4.1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

Threshold 4.4.2: Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The IS, provided in Appendix A, determined that the proposed project would not result in impacts associated with Thresholds 4.4.1. As a result, this threshold is not considered any further in the analyses of the potential impacts of the proposed project related to greenhouse gas.

4.4.7 Project Impacts

Threshold 4.4.2: *Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

Policies adopted for the purpose of reducing the emissions of greenhouse gases at the State level are discussed above, and include AB 32 and SB 375. The purpose of the ~~Sustainability~~ Sustainable Santee Plan is to reduce GHGs within the City. Implementation of the proposed project would not conflict with either of these policies. The proposed project includes baseline GHG emissions inventories for the years 2005 and 2013, emissions reduction targets for the years ~~2020,~~ 2030 and 2035, forecast emissions inventories under a BAU scenario for ~~2020,~~ 2030 and 2035, and reduced 2030 and 2035 inventory that demonstrates the emissions reductions achieved with the implementation of the statewide and local GHG reduction measures outlined in the proposed project. Appendix A of the Sustainable Santee ~~Sustainability~~ Plan contains the GHG Inventories, Long-Term Forecasts, and Target-Setting Report that supports the analysis below. Tables 4.4.F and 4.4.G detail the 2005 baseline communitywide and municipal emissions by sector. In 2005, communitywide emissions totaled 339,972 MT CO_2e and municipal emissions totaled 1,657 MT CO_2e. The largest source of communitywide emissions was on-road transportation, and the largest source of municipal emissions was SDG&E-owned streetlights.

Table 4.4.F: Community GHG Emissions by Sector for 2005

Sector	2005 Emissions (MT CO_2e)
On-Road Transportation	181,812
Residential Energy	63,544
Commercial Energy	37,697
Solid Waste	16,376
Water	11,354
Off-Road Sources	28,230
Wastewater	959
Total	**339,972**

Table 4.4.G: Municipal GHG Emissions by Sector for 2005

Sector	2005 Emissions (MT CO_2e)
Outdoor Lights–SDG&E-Owned	433
Fleet & Equipment	359
Buildings & Facilities	275
Solid Waste	210
Employee Commute	208
Outdoor Lights–City-Owned	153
Water Pumping	19.0
Total	**1,657**

~~AB~~SB32 sets greenhouse gas reduction goals for the State. By 203020, emissions should be at least ~~or~~ 40 percent below 1990 levels, and achieve net carbon neutrality by 2045 ~~emissions should be 80 percent below 1990 levels by 2050. To reach the 2020 target, a 15 percent decrease from 2005 levels is recommended in the AB 32 Scoping Plan.~~ To match the state's 2030 goal, ~~A~~ an interim goal for the City was created for 2030, which was to reduce emissions to 4038 percent below 2005 levels. To put the City on a path toward reaching ~~the~~ carbon neutrality by 2045 ~~State's 2050 goal~~, an

emission reduction of 49 percent below 2005 levels by 2035 is proposed. Tables ~~4.4.H,~~ 4.4.I, and 4.4.J summarize the ~~2020,~~ 2030, and 2035 BAU communitywide and municipal emissions inventories and outline the reduction targets for the City of Santee.

~~**Table 4.4.H: 2020 Mass Emissions Reduction Targets for Community and Municipal Operations**~~

	~~Community~~	~~Municipal~~
~~2020 Emissions Estimate (MT CO_2e)~~	~~432,982~~	~~1,948~~
~~2020 Target~~	~~15% below 2005 levels~~	
~~2020 Emissions Goal (MT CO_2e)~~	~~288,976~~	~~1,408~~
~~Amount to Reduce by 2020~~	~~144,006~~	~~540~~

Table 4.4.I: 2030 Mass Emission Reduction Targets for Community and Municipal Operations

	Community	Municipal
2030 Emissions Estimate (MT CO_2e)	486,170	2,003
2030 Target	40% below 2005 levels	
2030 Emissions Goal (MT CO_2e)	~~203,983~~ 249,596	1,033
Amount to Reduce by 2030	282,187	970

Table 4.4.J: 2035 Mass Emission Reduction Targets for Community and Municipal Operations

	Community	Municipal
2035 Emissions Estimate (MT CO_2e)	515,462	2,031
2035 Target	49% below 2005 levels	
2035 Emissions Goal (MT CO_2e)	173,386	845
Amount to Reduce by 2035	342,076	1,186

The 2020, 2030, and 2035 BAU emissions inventory were estimated in the Sustainable Santee ~~Sustainability~~ Plan using data from regional planning scenarios developed by SANDAG and the City. The BAU inventories represent emissions based on projected growth in population and employment and do not consider policies that will reduce emissions in the future (i.e., policies and related efficiency levels in place in 2013 are assumed to remain constant through 2035). The 2020, 2030 and 2035 community BAU emissions are estimated to be 432,982 MT CO_2e, 486,170 MT CO_2e, and 515,462 MT CO_2e, respectively. These estimates are an increase from 2005 baseline community emissions, with an increase of 93,010 MT CO_2e in 2020, 146,198 MT CO_2e in 2030, and 175,490 MT CO_2e in 2035. The difference between the BAU-forecast community emissions and the established reduction targets for ~~2020,~~ 2030, and 2035 is ~~144,006 MT CO_2e~~, 282,187 MT CO_2e, and 342,076 MT CO_2e, respectively. This is the amount the City of Santee must reduce its community emissions in order to reach its target and match the AB 32 reduction target.

The 2020, 2030, and 2035 municipal BAU emissions are estimated to be 1,948 MT CO_2e, 2,003 MT CO_2e, and 2,031 MT CO_2e, respectively. These estimates are an increase from the 2005 baseline municipal emissions, with an increase of 291 MT CO_2e in 2020, 346 MT CO_2e in 2030, and 374 MT CO_2e in 2035. The difference between the BAU-forecast municipal emissions and the established reduction targets for ~~2020,~~ 2030 and 2035 is ~~540 MT CO_2e,~~ 970 MT CO_2e, and 1,186 MT CO_2e,

respectively. This is the amount the City of Santee must reduce its municipal emissions in order to reach its target and match the SB~~AB~~ 32 reduction target.

The proposed project includes goals, measures, and actions that can be used at the municipal and community levels to meet the City's mass emissions reduction targets identified above. Each goal contains measures to indicate the City's commitment to meeting the goal, and within each measure there are one or more actions presented to indicate the steps the City can take to achieve the measure. Goals at the municipal level include:

- ~~Participate in Education, Outreach, and Planning Efforts for Energy Efficiency;~~
- Increase Energy Efficiency in Municipal Buildings;
- Increase Energy Efficiency in Community Buildings and Infrastructure;
- On-Road Energy Efficiency Enhancements; Employee Commute and Vehicle Fleet; and
- Reduce Energy Consumption in the Long Term.

Goals at the community level include:

- Increase Energy Efficiency in Existing and New Residential Units;
- Increase Energy Efficiency in Existing and New Commercial Units;
- ~~Increase Energy Efficiency through Water Efficiency;~~
- Decrease Energy Demand through Reducing Urban Heat Island Effect;
- Decrease GHG Emissions through Reducing VMT;
- Increase use of Electric Vehicles ;
- Improve Traffic Flow;
- Decrease GHG Emissions through Reducing Solid Waste Generation; and
- Decrease GHG Emissions through Increasing Clean Energy Use.~~; and~~
- ~~Decrease GHG Emissions from New Development through Performance Standards.~~

Implementation of these goals, and their associated measures and actions, would reduce communitywide GHG emissions ~~by 3011 percent compared to the 2020 BAU emissions, and by~~ 40~~39~~ percent below ~~compared to~~ 2005 emissions by 2030, and 49 percent by 2035 ~~BAU emissions~~. State and federal reduction measures would reduce the 2020 BAU emissions by an additional 19 percent, and would reduce the 2035 BAU emissions by 35 percent. Tables 4.4.K and 4.4.L outline the projected communitywide and municipal emissions inventories for the years ~~2020,~~ 2030 and 2035 after implementation of these proposed local reduction strategies, and State and federal GHG reduction measures. Both communitywide and municipal targets will be met by ~~2020,~~ 2030 and 2035 with implementation of goals in the proposed project and State and federal reduction measures.

Table 4.4.K: Community Emissions and Targets Comparison

	2005 MT CO_2e	2020 MT CO_2e	2030 MT CO_2e	2035 MT CO_2e
BAU Emissions	339,972	432,982	486,170	515,462
Reduction Target	—	~~288,976~~	249,596	173,386
State & Federal Reductions	—	80,876	146,656	178,919
Local Reductions excluding CCA	—	~~92,569~~ ~~81,047~~	~~133,135~~ 72,615	~~153,418~~ 107,723
Local Reductions including CCA	—	~~259,537~~	~~206,379~~ 118,937	~~183,125~~ 164,655
Total Adjusted Emissions excluding CCA	—	~~259,537~~ ~~271,059~~	~~206,379~~ 266.899	~~205,081~~ 228,820
Total Adjusted Emissions including CCA	—	~~220,836~~ ~~232,358~~	~~160,057~~ 220,577	~~132,993~~ 177,888
Additional Reductions Needed without CCA	—	~~Target Met~~	~~Target Met~~ 17,303	~~9,739~~ 55,434
Additional Reductions Needed with CCA	—	~~Target Met~~	Target Met	Target Met

BAU = Business as Usual MT CO_2e = metric tons of carbon dioxide equivalent

Table 4.4.L: Municipal Emissions and Targets Comparison

	2005 MT CO_2e	2020 MT CO_2e	2030 MT CO_2e	2035 MT CO_2e
BAU Emissions	1,657	1,948	2,003	2,031
Reduction Target	—	~~1,408~~	~~1,033~~ 994	845
State & Federal Reductions	—	337	346	350
Local Reductions	—	~~260~~	~~787~~ 264	1,054~~0~~
Total Adjusted Emissions	—	~~1,351~~	~~870~~ 399	627~~631~~
Additional Reductions Needed	—	~~Target Met~~	Target Met	Target Met

BAU = Business as Usual MT CO_2e = metric tons of carbon dioxide equivalent

SB 375 sets regional targets for the reduction of GHG emissions from passenger vehicles. The targets for the SANDAG region is ~~are a 7 percent decrease and~~ a 13 percent decrease per capita from 2005 for the year~~s 2020and~~ 2035~~, respectively~~. Table 4.4.M quantifies the BAU per capita emissions from passenger vehicles for 2005, ~~2020,~~ and 2035 and associated reduction targets for the projected years for the City of Santee.

Table 4.4.M: Passenger Vehicle Emissions Reduction Targets

	2005	~~2020~~	2035
On-Road Transportation Emissions (MT CO_2e)	181,812	~~264,162~~	318,334
Santee Service Population [a]	70,152	~~76,437~~	84,200
BAU MT CO_2e per capita	2.59	~~3.46~~	3.78
Reduction Target	—	~~2.41 (7%)~~	2.25 (13%)

[a] Service Population is the sum of population plus employment.

BAU = Business as Usual MT CO_2e = metric tons of carbon dioxide equivalent

The proposed project includes specific goals at the communitywide and municipal levels designed to reduce emissions from passenger vehicles. Community Goal 5, Decrease GHG Emissions through Reducing VMT, includes four measures to effectively achieve this reduction:

1. Encourage Non-Motorized Transportation Options
2. Implement the Bicycle Master Plan to Expand the Bicycle Routes around the City
~~1. Promote Ride-Sharing Programs within Businesses~~
~~4~~3. Electrify the Fleet
2. Complete Streets and Safe Routes to Schools Programs
3. Reduce Vehicle Trips To/From School

Municipal Goal 4, On-Road Energy Efficiency Enhancement; Employee Commute and Vehicle Fleet, also contains four measures to aid in the reduction of passenger vehicle emissions within City operations. These measures are:

1. Encourage or Incentivize Employee Carpools.
2. Encourage or Incentivize Purchase of Hybrid or Electric Vehicles.
3. Replace or Supplement Vehicle Fleet with Hybrid/Electric Vehicles.
4. Install E-Vehicle Chargers.

Table 4.4.N outlines the emissions reduction potential from these measures. Implementation of these measures and their associated actions would reduce emissions from passenger vehicles within the City by 23 percent compared to the 2020 BAU on-road transportation emissions, and by 30 percent compared to the 2035 BAU on-road transportation emissions. State and federal reduction measures would reduce the 2020 BAU on-road transportation emissions by an additional 17 percent, and would reduce the 2035 BAU emissions by an additional 42 percent. Table 4.4.O outlines the adjusted on-road transportation emissions with these proposed local reduction strategies and State and federal GHG reduction measures. Per capita passenger vehicle emissions targets will be met by 2020 and 2035 with implementation of the goals in the proposed project and the State and federal reduction measures.

Table 4.4.N: Emissions Reduction Potential of Sustainable Santee On-Road Transportation Measures

	~~2020~~ 2030 reduction potential (MT CO_2e)	2035 reduction potential (MT CO_2e)
~~C5~~6.1 Encourage Non-Motorized Transportation Options	~~438~~ 315	~~373~~ 263
~~C5~~6.2 Implement Bicycle Master Plan to Expand Bike Routes around City	~~14,788~~ 311	~~12,600~~ 259
~~C5.3 Promote Ride Sharing Programs within Businesses~~	~~19,761~~	~~16,838~~
~~C5.4~~ 7.1 Electrify the Fleet	~~3,341~~ 21,723	47,414
~~C5.5 Complete Streets and Safe Routes to Schools Programs~~ 8.1 Traffic Flow Improvements	~~5,477~~ 2,430	~~4,667~~ 2130
~~C5.6 School Bus Program~~	~~16,431~~	~~14,000~~
Total	~~60,236~~ 24,779	~~95,892~~ 50,066

MT CO_2e = metric tons of carbon dioxide equivalent

Table 4.4.O: Adjusted On-Road Transportation Emissions

	~~2020~~ 2030	2035
SB 375 per capita passenger vehicle emissions target	2.41	2.25
State on-road transportation measures reduction	45,589	135,014
Adjusted on-road transportation Emissions	~~218,573~~ 201,729	183,320
Adjusted on-road transportation Emissions with proposed measures	~~158,337~~ 176,950	~~87,428~~ 133,258
Adjusted MT CO_2e per capita with proposed measures	~~2.07~~ 2.17	~~1.04~~ 1.58

MT CO_2e = metric tons of carbon dioxide equivalent

Because SB 375 does not include reduction targets for 2030, the analysis of on-road transportation emissions compares 2030 and 2035 emissions with the SB 375 reduction targets for 2035. The SB 375 reduction target is 2.25 MT CO_2e per capita. With implementation of the proposed measures in the Sustainable Santee ~~Sustainability~~ Plan, reduction targets for the City of Santee for both ~~A~~ SB 32 and SB 375 will be met by ~~2020~~ 2030 and 2035. In each case, the targets are exceeded by 4 percent or greater ~~than 10 percent~~. Implementation of Sustainable Santee ~~Sustainabilit~~y Plan measures and actions would therefore not result in conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

4.4.8 Level of Significance Prior to Mitigation

All potential impacts related to GHG emissions would be less than significant.

4.4.9 Mitigation Measures

The proposed project would not result in any significant adverse impacts related to GHG emissions. No mitigation is required.

4.4.10 Level of Significance after Mitigation

There would be no significant unavoidable adverse impacts of the proposed project related to GHG emissions.

4.4.11 Cumulative Impacts

The analysis of GHG emissions is cumulative in nature, and no separate analysis is required.

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4.5 HAZARDS AND HAZARDOUS MATERIALS

This section provides a discussion of the existing hazards and hazardous materials on the proposed Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions ("Sustainable Santee Plan" or "proposed project") and in the surrounding area, as well as an analysis of potential impacts that could result from implementation of the proposed project with regard to proposed project being located within an airport land use plan.

4.5.1 Scoping Process

The Initial Study ("IS") prepared for the proposed project indicated that future development projects that would implement proposed project could be located within an airport land use plan and have potential safety hazards impacts from sources of glare. Therefore, this topic is analyzed further in this PEIR.

The IS, used to scope the analysis of the EIR, determined impacts from the proposed project are either less than significant or no impact on the following thresholds:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 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?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

The IS determined that adherence to federal, State, and local regulations regarding the use and disposal of hazardous materials and wastes would reduce to a less than significant level the potential for impacts to human health and safety and the environment in relation to (a) the handling, disposal, and transport of hazardous construction materials, (b) reasonably foreseeable upset and accident conditions, (c) the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and (d) the potential for the proposed project to be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The IS also determined that the proposed project would not be located within the vicinity

of a private airstrip and therefore would have no impact with regard to safety hazards associated with private aviation. In addition, it was determined that the proposed project would have a less than significant impact related to the implementation of an adopted emergency response plan or emergency evacuation plan and wildland fires since any future development projects that would implement proposed project would be subject to review under CEQA and all applicable City regulations, reviews, and requirements. Therefore, these topics are not analyzed further in this EIR. Please refer to Appendix A, IS/NOP, for additional discussion.

The City distributed the NOP for the EIR from August 17 to October 2, 2017. ~~Fifteen c~~ Comment letters were received in response to the NOP (refer to Appendix A). No issues related to hazards and hazardous materials were raised in those comment letters.

4.5.2 Methodology

The analysis in this section focuses on the potential airport and aviation hazards resulting from the implementation of the proposed project. The potential risks were qualitatively evaluated by evaluating the project's location relative to Airport Influence Areas (AIA) established in the Airport Land Use Compatibility Plans (ALUCP) for the airports within 2 miles of the proposed project and applicable Federal Aviation Administration (FAA) regulations. In determining the level of significance, the analysis assumes that construction and operation of future development under the proposed project would comply with all applicable federal, State, and local laws and regulations.

4.5.3 Existing Environmental Setting

The City of Santee is located within two AIAs: Gillespie Field and Marine Corps Air Station (MCAS) Miramar. Gillespie Field is located along the southern border of the City and is a publicly-owned facility sited on approximately 750 acres. Gillespie Field is owned by the County of San Diego and operated by the County's Department of Public Works. It serves the aviation needs of the City of El Cajon and surrounding cities (San Diego County Regional Airport Authority 2010). The airport has over 180,000 annual operations that include aviation aircraft and helicopters (County of San Diego 2017a). Gillespie Field includes three runways, a tower, and a terminal, as well as additional airport-related businesses such as flight schools, repair and maintenance shops, aircraft storage, food and beverage services, fuel, instrument, and avionics shops, rental cars and aircraft sales, and rental services (County of San Diego 2017b).

MCAS Miramar is located along the western border of the City and provides aviation and other facilities and services in support of various United States Marine Corps and Navy operating units. MCAS Miramar encompasses 36 square miles situated within the northern part of the City of San Diego. Interstate 15 divides the base into two functionally distinct areas. The airfield and related aviation and industrial facilities occupy the western portion, while the eastern side is largely open land used for various training purposes. MCAS Miramar is designated as a master jet facility and serves both fixed and rotary-wing aircraft. It has three runways, one helicopter landing deck strip, and six helipads (San Diego County Regional Airport Authority 2011).

Both Gillespie Field and MCAS Miramar have adopted ALUCPs. The ALUCPs contain policies to minimize impacts to residents and employees within their identified AIAs. The ACLUPs have guidelines for land use compatibility and identify specific land use types and their compatibility

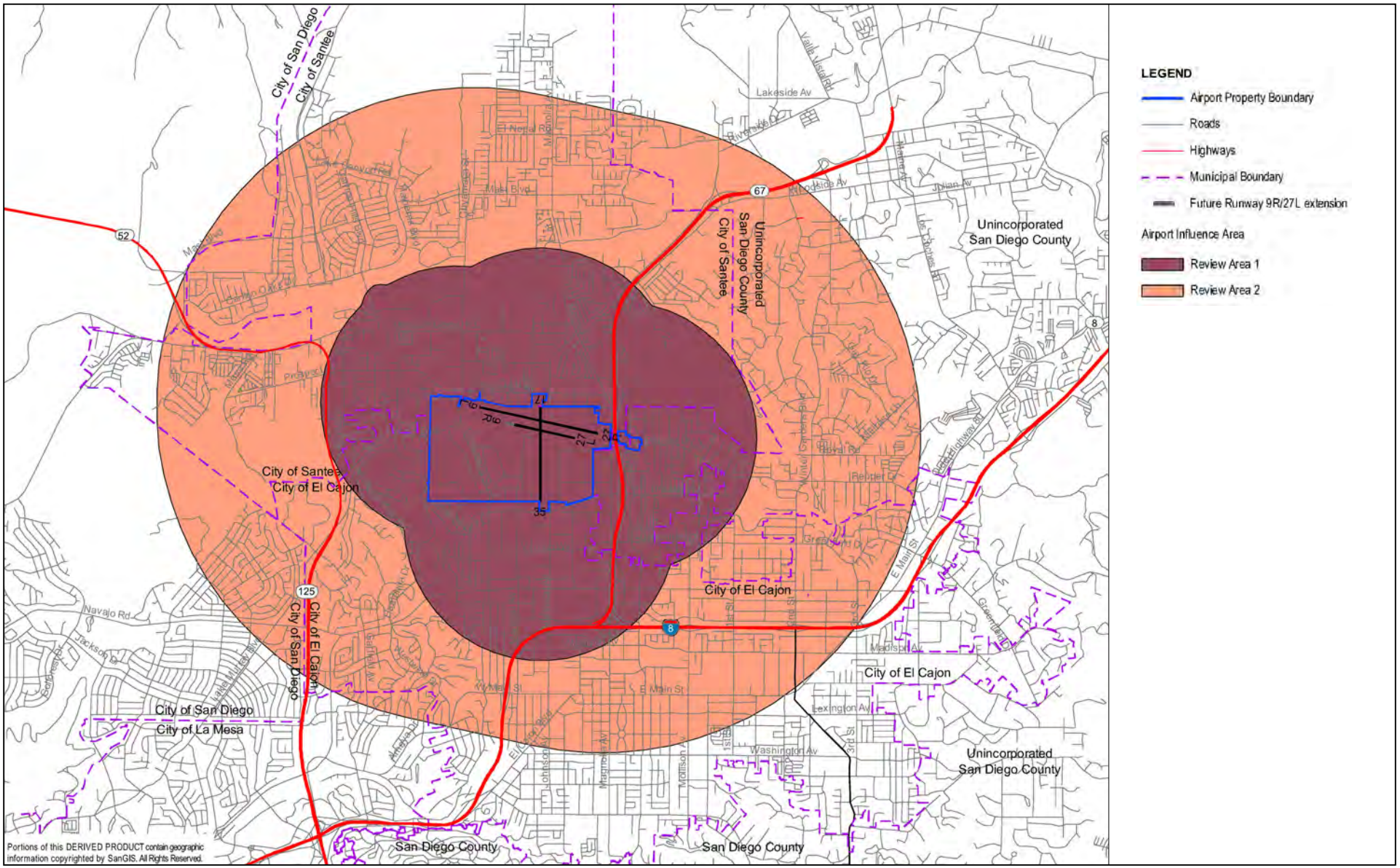
within the AIAs and airport safety zones. The ACLUPs address airport land use compatibility concerns regarding exposure to aircraft noise, land use safety with respect both to people and property on the ground and the occupants of the aircraft, protection of airport airspace, and general concerns related to aircraft overflights. Airport safety zones and height restrictions are intended to protect the safety of the people that work or reside within AIAs. Figures 4.5.1 through 4.5.6 show the following for the two airports: the AIAs, airport safety zones, and Part 77 Airspace Protection.

Concentration of people and facilities in the vicinity of airports raises concerns about safety and aircraft hazards. Section 4.5.4, Regulatory Setting, further describes the federal, State, and local regulations that impose land use and height restrictions in the vicinity of airports to ensure that no structures or activities adversely affect navigable airspace.

4.5.4 Regulatory Setting

4.5.4.1 Federal Policies and Regulations

Federal Regulation 49, CFR Title 14, Part 77. Federal Regulation 49, Code of Federal Regulation (CFR) Title 14, Part 77 establishes standards and notification requirements for objects affecting navigable airspace. In particular, CFR Title 14 Part 77.13 requires that any developer who intends to perform any construction or alterations to structures that exceed 200 feet in height above ground level must obtain project approval from the FAA. Height restrictions set forth by the FAA Federal



LSA

FIGURE 4.5-1

N

0 4000 6000

FEET

SOURCE: Airport Land Commission, San Diego County

I:\SNT1701\G\Gillespie_Airport_Influence_Area.cdr (11/6/2017)

Sustainable Santee Plan

Gillespie Field - Airport Influence Area

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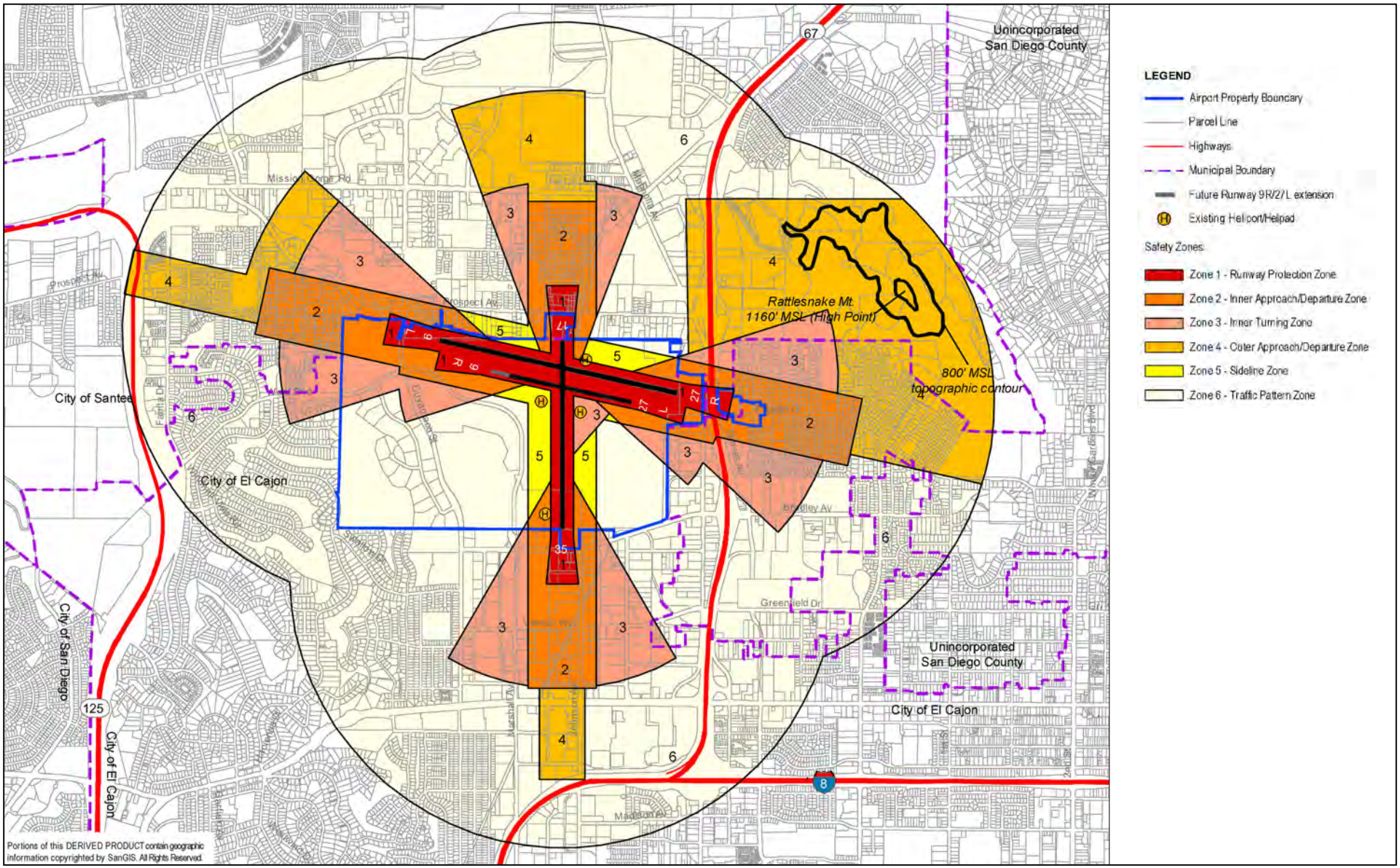

LSA

FIGURE 4.5-2

N

0 1500 3000

FEET

SOURCE: Airport Land Commission, San Diego County

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Sustainable Santee Plan

Gillespie Field - Airport Safety Zones

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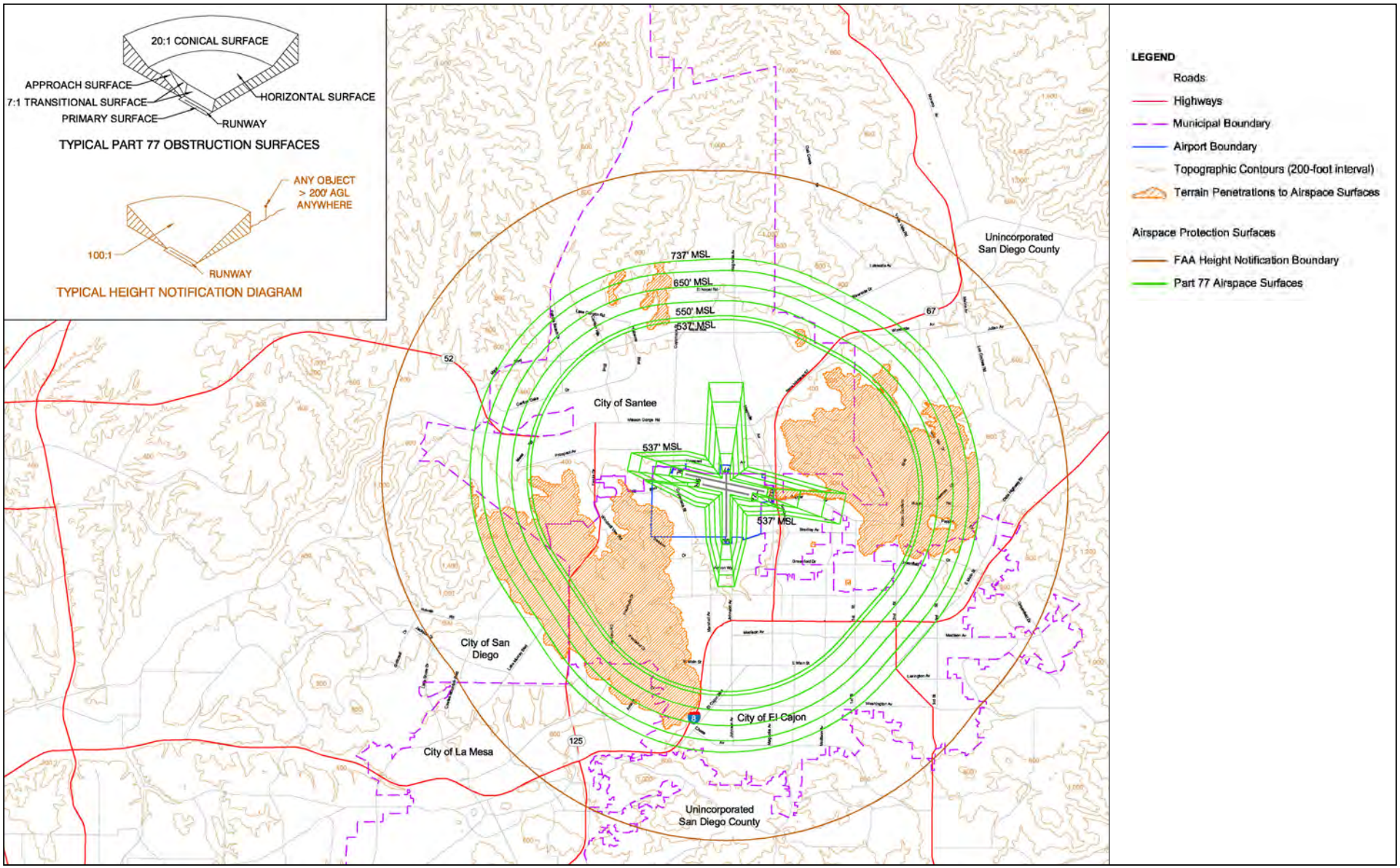

LSA

FIGURE 4.5-3

N

0 4500 9000

FEET

SOURCE: Airport Land Commission, San Diego County

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Sustainable Santee Plan

Gillespie Field - Part 77 Airspace Protection

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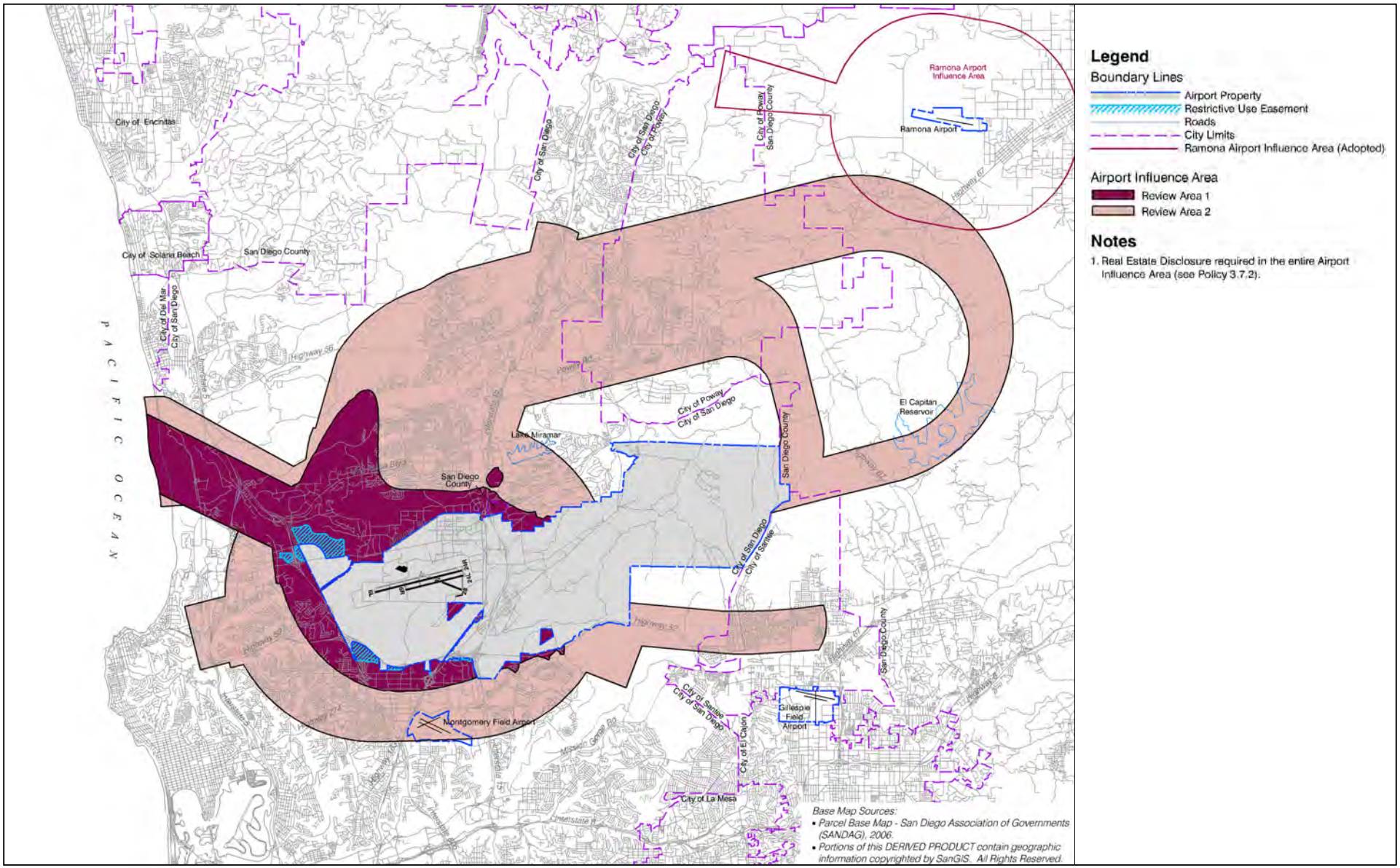

LSA

FIGURE 4.5-4

N

0 12000 24000

FEET

SOURCE: Airport Land Commission, San Diego County

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Sustainable Santee Plan

MCAS Miramar - Airport Influence Area

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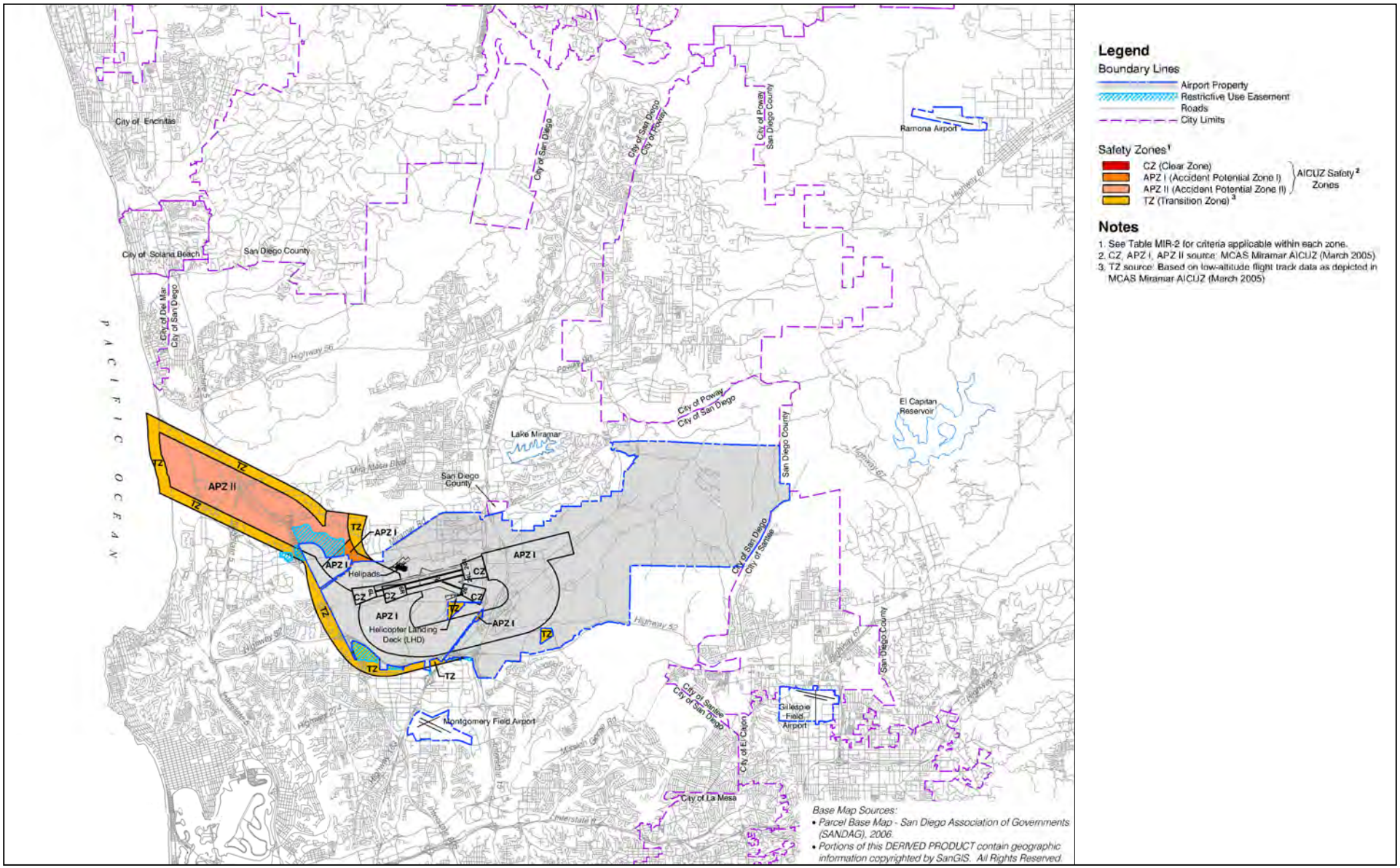

LSA

FIGURE 4.5-5

N

0 12000 24000

FEET

SOURCE: Airport Land Commission, San Diego County

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Sustainable Santee Plan

MCAS Miramar - Airport Safety Zones

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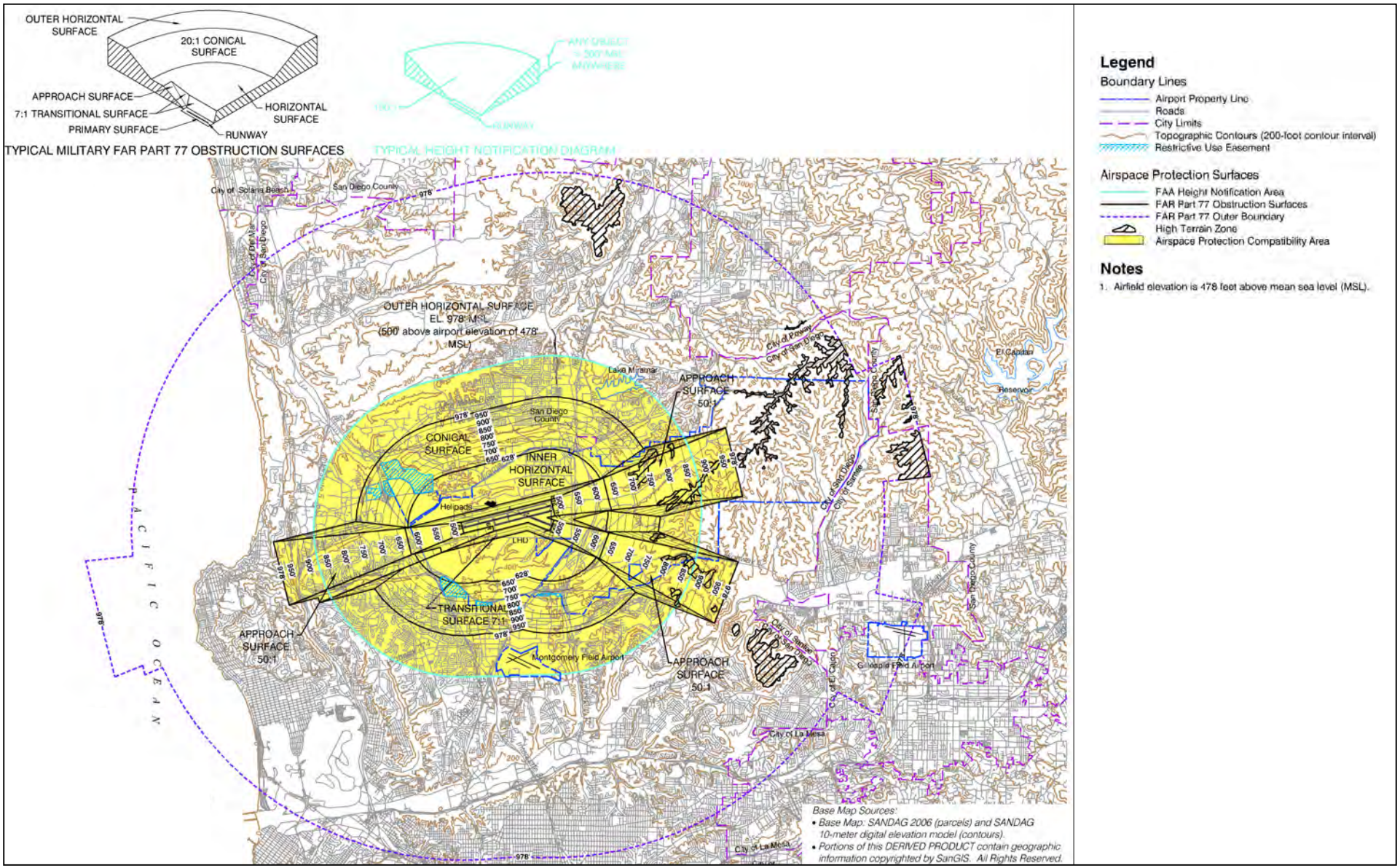

LSA

FIGURE 4.5-6

N

0 12000 24000

FEET

SOURCE: Airport Land Commission, San Diego County

I:\SNT1701\G\Miramar_Airport_P77_Airspace_Protection.cdr (11/6/2017)

Sustainable Santee Plan

MCAS Miramar - Part 77 Airspace Protection

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Aviation Regulation (FAR) Part 77 requires all development exceeding 200 feet in height to submit Form 7460-1 (Notice of Proposed Construction or Alteration) to the FAA. In addition, all projects that exceed the FAR Part 77, Objects Affecting Navigable Airspace, 100:1 slope (100 feet in distance to 1 foot in height) are also required to submit a Notice of Proposed Construction or Alteration to the FAA.

4.5.4.2 State Policies and Regulations

California Public Utilities Code Section 21659. The California Public Utilities Code Section 21659 does not permit construction or alternation of any structure at a height that exceeds the obstruction standards set forth in the regulations of the FAA relating to objects affecting navigable airspace contained in Title 14 CFR, Part 77, Subpart C, unless a permit allowing the construction, alteration, or growth is issued by the department.

California Public Utilities Code Section 21676. California Public Utilities Code Section 21676 requires the local general plans must be consistent with the adopted airport land use compatibility plans developed by airport land use commissions.

State Aeronautics Act. The State Aeronautics Act is contained in the California Public Resources Code Sections 21001 et seq. and is established for several purposes, including encouraging development of private flying and general use of air transportation, fostering and promoting safety in aeronautics, protecting residents in the vicinity of an airport from unreasonable intrusions from airport noise, and establishing regulations for allowing the conduct of aviation activities in a manner not inconsistent with the rights of others.

4.5.4.3 Local Policies and Regulations

Gillespie Field Airport Land Use Compatibility Plan. The Gillespie Field ALUCP, adopted in 2010 by the San Diego County Regional Airport Authority, is intended to promote airport land use compatibility. Specifically, the ALUCP (1) provides for the orderly growth of the Airport and the area surrounding the Airport; and (2) safeguards the general welfare of the inhabitants within the vicinity of the Airport and the public in general (Pub. Util. Code §21675(a)). The ALUCP serves as a tool for the San Diego County Regional Airport Authority to use in to review land use plans and development proposals within the AIA at the airport. In addition, this ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of general plans[1] and to landowners in their design of new development. The ALUCP sets guidelines related to land use compatibility, aircraft noise impacts, height protection, and airport safety to ensure land use compatibility. The Gillespie Field AIA 1, closest to the airport, impacts development in the southeastern portion of the City of Santee

MCAS Miramar Airport Land Use Compatibility Plan. The MCAS Miramar ALUCP, adopted in 2008 (and as amended in 2011) by the San Diego County Regional Airport Authority, is the fundamental tool used by the San Diego County Regional Airport Authority to promote airport land use compatibility. Specifically, this ALUCP (1) provides for the orderly growth of the Airport and the area

[1] Policy 2.2.21 of the ALUCP defines general plans to include any general plan, community plan, specific plan, zoning ordinance, building regulation, land use policy document, or implementing ordinance.

surrounding the Airport; and (2) safeguards the general welfare of the inhabitants within the vicinity of the Airport and the public in general. The ALUCP serves as a tool to review land use development proposals within the AIA at MCAS Miramar. In addition, the ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development. The ALUCP sets guidelines related to land use compatibility, aircraft noise impacts, height protection, and airport safety to ensure land use compatibility. The City of Santee is located outside of the MCAS Miramar's AIA 1. A second review area (AIA 2) located further from the airport, extends over the extreme northern perimeter of the City of Santee and a swath centered along Mast Boulevard extending eastward to Magnolia Avenue.

4.5.5 Proposed Sustainable Santee Plan Goals and Measures

The following proposed Goals and Measures are applicable to the analysis of hazards and hazardous materials:

- *Community GHG Reduction Strategies and Emission Reductions.*
  - Goal 1: Increase Energy Efficiency in Existing Residential Units

    1.1: Energy Audits in the Existing Residential Units ~~Efficiency Education and Best Practices~~

    ~~1.2: Increase Community Participation in Existing Energy Efficiency Opportunities~~

    ~~1.3: Home Energy Evaluations~~

    ~~1.4: Residential Home Energy Renovations~~
  - Goal 2: Increase Energy Efficiency in New Residential Units

    2.1: Exceed Energy Efficiency Standards
  - Goal 3: Increase Energy Efficiency in Existing Commercial Units

    3.1: Energy Audits in the Existing Commercial Sector ~~Efficiency Training, Education, and Recognition in the Commercial Sector~~

    ~~3.2: Increase Business Participation in Existing Energy Efficiency Programs~~

    ~~3.3: Non-Residential Energy Audits~~

    ~~3.4: Non-Residential Retrofits~~
  - Goal 4: Increase Energy Efficiency in New Commercial Units

    4.1: Exceed Energy Efficiency Standards
  - Goal ~~6~~ 5: Decrease Energy Demand through Reducing Urban Heat Island Effect

    ~~6~~ 5.2: Light-reflecting Surfaces for Energy Efficiency
  - Goal 10: Decrease GHG Emissions ~~–~~through Clean Energy Use ~~from New Development through Performance Standards~~

    10.1: Increase Distributed Renewable Generation within Santee ~~Screening Tables~~

- *Municipal GHG Reduction Strategies and Emission Reductions.*
  - Goal M-1.1: Install Cool Roofs ~~Participate in Education, Outreach, and Planning Efforts for Energy Efficiency~~.

Potential Impacts

Measures and Actions to promote and to educate the public on energy efficiency and savings programs (Supporting Measures ~~1.1, 1.2, 1.4, 3.1, 3.2, and 3.4~~) may generate an expanded demand to install roof-top solar photo voltaic panels on the top of existing homes and businesses. Similarly, Measures 2.1, 4.1, ~~6~~5.2, and 10.1 may require roof top or ground mounted solar photo voltaic panels and light reflecting surfaces for new development. Measures 5.1 ~~and 6.1~~ would have the impact of planting more and different types of trees within the City.

4.5.6 Impact Significance Criteria

The thresholds for hazards and hazardous materials impacts used in this analysis are consistent with Appendix G of the *CEQA Guidelines*. The effects of the proposed project related to hazards and hazardous materials are considered to be significant if the proposed project would:

Threshold 4.5.1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Threshold 4.5.2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Threshold 4.5.3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Threshold 4.5.4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

Threshold 4.5.5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Threshold 4.5.6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Threshold 4.5.7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

The Initial Study, provided in Appendix A, determined that the proposed project would not result in impacts associated with Thresholds 4.5.1 through 4.5.4 and Threshold 4.5.6. As a result, these thresholds are not considered any further in the analyses of the potential impacts of the proposed project related to hazards and hazardous materials.

4.5.7 Project Impacts

The Sustainable Santee Plan could be reasonably expected to generate additional solar photo-voltaic systems and other renewable energy devices that would primarily be installed on rooftops of new or existing buildings. These devices could introduce substantial new sources of glare and could also increase overall height of buildings, which may have an impact on existing airports.

Threshold 4.5.5: *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

Implementation of the Sustainable Santee Plan would reduce VMT, thus reducing total vehicular noise in the City. The Sustainable Santee Plan implementation would not add vehicle trips. Implementation of the policies and programs of the Sustainable Santee Plan would augment existing City programs and policies with regard to transit-oriented development. Energy retrofits would likely reduce impacts from vehicular noise to occupants of the particular buildings, since increased insulation and double- or triple-paned windows also would act to buffer exterior noise levels. Installation activities for energy retrofits on existing residential and commercial buildings, or installation of renewable energy facilities such as photovoltaic arrays, may result in temporary increases in noise; however, it is anticipated that such activities would not require large construction equipment that would result in substantial noise. Additionally, each specific development project would undergo evaluation and noise study and mitigation measures if above normally acceptable levels defined in the General Plan prior to project approval for consistency with General Plan policies and standards. There would be less than significant noise impacts from implementation of the Sustainable Santee Plan.

Implementation of the Sustainable Santee Plan could result in construction of energy-generating facilities such as solar panels and photovoltaic arrays that would primarily be installed on rooftops of new or existing buildings. These energy-generating rooftop structures could introduce substantial new sources of glare and could also increase overall height of buildings.

The Gillespie Field Airport is located along the City's southern border and MCAS Miramar Airport is located along the City's western border. Both AIA boundaries extend into the City of Santee. The San Diego County Regional Airport Authority has adopted an ALUCP for each airport that implements the FAA FAR Part 77. The FAA Height Notification Boundary extends 20,000 feet from the nearest point of any runway. Part 77, Subpart B requires FAA notification (through submittal of the FAA Form 7460 1) for structures within the boundary that exceed a slope of 100:1 (100 feet in distance from the runway to 1 foot in height). Outside of the boundary, applicants who intend to perform any construction or alterations that exceed 200 feet in height above ground level must also notify the FAA (through submittal of the FAA Form 7460 1).

The ALUCPs also discuss AIAs, which are divided into two review areas: Review Area 1 and Review Area 2. Review Area 1 consists of locations where noise and safety concerns may necessitate limitations on the types of land uses actions. Specifically, Review Area 1 encompasses locations exposed to aircraft noise levels of 60 dB CNEL or greater together within all of the safety zones. The safety zones are established for the purpose of evaluating the safety compatibility of land use

development. The ALUCP identifies land use types as incompatible, conditional, or compatible, and establishes criteria applicable to each zone. Within Review Area 1, all land use actions are subject to San Diego County Regional Airport Authority review to the extent required by law. Review Area 2 consists of locations beyond Review Area 1 but within the airspace and/or overflight notification areas. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. Therefore, since review procedures in regard to height are in place, implementation of the proposed project would not increase safety hazards for people residing or working in the project area.

Implementation of the proposed project could pose an aviation safety hazard from the glare and increases in height that could result from the energy-generating rooftop structures such as solar panels and photovoltaic arrays. However, as described above, the ALUCPs include review procedures and restrictions for projects located within AIAs. If any project under the Sustainable Santee Plan is determined to present a safety hazard from increased glare or height, appropriate mitigation measures would be required on a project level to reduce or avoid the safety hazard to the satisfaction of the San Diego County Regional Airport Authority. Additionally, as described in Section 4.1, Aesthetics, **MM 4.1-1** shall be implemented for all discretionary projects under the Sustainable Santee Plan to reduce glare impacts.

In addition to adherence to all local, regional, State, and federal regulations and compliance with the guidelines of the ALUCPs, with implementation of **MM 4.1-1**, impacts of glare from implementation of the proposed project would be reduced to less than significant by ensuring that energy-generating structures do not result in safety hazard for people residing or working in the project area.

Threshold 4.5.7: *Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

According to Cal Fire, the northern and southwestern portions of the City are designated as Very High Fire Hazard Severity Zones located in the local responsibility areas for the City of Santee.[2] The northern and southwestern portions of the City are along the wildland urban interface (WUI), where structures are built in close proximity to wildland areas. Approximately 89 residential structures with a population of 222 residents, 3 commercial structures, and 1 fire station are within the Very High Fire Hazard Severity Zones.[3]

Chapter 4 of the Sustainable Santee ~~Sustainability~~ Plan evaluated climate change risks, predicting an increase of wildland fires in the WUI, and recommended adaptation strategies that if implemented would mitigate the future increased risks due to wildland fires within the City of Santee. The adaptation strategies related to wildland fires are found in Chapter 4 of the ~~Sustainability~~ ~~Plan~~

[2] Cal Fire Very High Fire Hazard Severity Zones Map for the City of Santee. Website: http://fire.ca.gov/fire_prevention/fhsz_maps/FHSZ/san_diego/Santee.pdf. Accessed March 6, 2019.

[3] County of San Diego Multi-jurisdictional Hazard Mitigation Plan, 2017 Hazard Mitigation Plan Documents for the City of Santee. Website: https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency_management/HazMit/2017/City-of-Santee-HazMit-Section-5.pdf. Accessed on March 6, 2019.

Sustainable Santee Plan under the titles "Public Health and Safety," and "Wildfire." The adaptation strategies include the following actions that the City should take in addressing wildland fires:

- Map neighborhoods that could be more vulnerable to the effects of climate change including fire to identify high risk areas of the City.
- Educate the public on the importance of fire safety.
- Create buffer zones between vegetation and structures and infrastructure through the use of fire fuel load modifications.
- Identify fire-prone habitats, evaluate and plan for the increased risk of larger and more frequent wildfires.

The City has committed to updating the Safety Element of the General Plan within the next two years which presents an opportunity to include policies within the Safety Element Update aimed at implementing the recommendations in the Sustainable Santee ~~Sustainability~~ Plan related to the adaptation strategies addressing the increased wildland fire risks.

Implementation of the Sustainable Santee ~~Sustainability~~ Plan would reduce the risks of wildland fires within the City. Therefore, this impact is less than significant, however, to ensure the Safety Element of the General Plan is updated to include adaptation strategies addressing the increased wildland fire risks, Mitigation Measure 4.5-1 is provided.

4.5.8 Level of Significance Prior to Mitigation

Prior to mitigation, energy-generating structures could result in glare resulting in safety hazards and a potentially significant impact requiring mitigation. The Sustainable Santee ~~Sustainability~~ Plan, if fully implemented, provides an opportunity to further reduce the hazards associated with wildland fires. All other potential impacts related to hazards and hazardous materials would be less than significant.

4.5.9 Mitigation Measure

MM 4.1-1 All proposed energy-generating structures shall be constructed utilizing non-reflective materials to the maximum extent feasible. If a reflective material is used, appropriate shielding shall be placed or the structure relocated to reduce the amount of visible glare. The City shall review all discretionary projects prior to issuance of building permits to ensure that appropriate shielding and placement of such structures are included in design plans.

MM 4.5-1 Within two years of adoption of the Sustainable Santee Plan, the City of Santee shall update the Safety Element of the General Plan and include policies that will implement the climate change adaptation strategies found in Chapter 4 of the Sustainable Santee ~~Sustainability~~ Plan.

4.5.10 Level of Significance after Mitigation

MM 4.1-1 would reduce the impact of glare to less than significant. **MM 4.5.1** would ensure that the adaptation strategies within the Sustainable Santee ~~Sustainability~~ Plan are implemented, which will further reduce hazards. There would be no significant unavoidable adverse impacts of the proposed project related to hazards and hazardous materials.

4.5.11 Cumulative Impacts

Future development in the City of Santee could be located within the AIAs of Gillespie Field and MCAS Miramar. Development pursuant to the Sustainability Plan and any other related projects within the AIAs would be required to submit Form 7460-1 if buildings or appurtenant structures exceed 200 feet in height and/or exceed the 100:1 slope (100 feet in distance to 1 foot in height). In addition, each project pursuant to the Sustainable Santee ~~Sustainability~~ Plan and future projects, whether within the AIA area or not, would be required to undergo individual design and environmental review to develop appropriate mitigation measures particular to each project site to reduce glare. The San Diego County Regional Airport Authority would review all projects proposed within the AIAs. Adherence to all local, State, and federal regulations would ensure that the proposed project and other related projects do not result in a significant public aviation hazard. Additionally, **MM 4.1-1** shall be implemented for all discretionary projects under the Sustainable Santee ~~Sustainability~~ Plan to reduce glare impacts. Finally, MM 4.5-1 ensures implementation of the Sustainable Santee ~~Sustainability~~ Plan adaptation strategies further reducing hazards related to climate change risk. Therefore, with implementation of **MM 4.1-1** and **MM 4.5-1**, the contribution of the proposed project and other area projects to aviation safety hazards would not be cumulatively considerable and would therefore be less than significant.

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4.6 LAND USE AND PLANNING

This section evaluates the potential land use and planning impacts associated with implementation of the proposed Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions ("Sustainable Santee Plan" or "proposed project"). This analysis evaluates the proposed project's consistency with applicable land use plans, policies, and regulations, and applicable habitat conservation plans or natural community conservation plans.

4.6.1 Scoping Process

The Initial Study (IS) prepared for the proposed project indicated that implementation of the proposed project could conflict with applicable land use plan, policies, or regulations of an agency with jurisdiction over the project (including, but not limited to the General Plan, Specific Plans, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect as well as conflict with the provisions of an adopted HCP or NCCP. Therefore, this topic is analyzed further in this PEIR.

The IS determined that implementation of the proposed project would not change any existing land use designations nor create any physical development and therefore would not affect the two issues listed in the Appendix G Checklist:

1) would not physically divide an established community; and
2) would not 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 environment effect.

Therefore, this topic is not analyzed further in this PEIR. Please refer to Appendix A, IS/NOP, for additional discussion.

The City distributed the NOP for the PEIR from August 17 to October 2, 2017. ~~Fifteen c~~ Comment letters were received in response to the NOP. No issues related to land use and planning were raised in those comment letters.

4.6.2 Methodology

The programs and measures contained in the Sustainable Santee Plan were compared to applicable land use plan policies to determine if any inconsistencies exist. These land use plans include the SDAPCD's RAQS and the SIP, the MSCP, SANDAG's RCP, SANDAG's RTP/SCS, City of Santee General Plan, City of Santee Zoning Code, specific plans adopted by the City, and the Gillespie Field and MCAS Miramar ALUCPs.

4.6.3 Existing Environmental Setting

The City of Santee is located along the San Diego River in the eastern portion of San Diego County. The City encompasses approximately 16.5 square miles and is approximately 18 miles east of downtown San Diego, as shown in Figure 3.1 (Project Location).

The City is bounded on the north by the Sycamore Canyon Open Space Preserve and vacant, privately owned land in the County of San Diego. To the northeast of the City are vacant land and

Slaughterhouse Canyon active mining operations. To the east are the San Diego County communities of Eucalyptus Hills and Lakeside, and to the southeast are the communities of Riverview Farms and Winter Gardens. To the south, Santee is bounded by the City of El Cajon and the Gillespie Field Airport, and to the southwest is Mission Trails Regional Park in the City of San Diego. To the west of Santee are the Sycamore Canyon Landfill and the City of San Diego community of East Elliott. To the northwest is the Marine Corps Air Station at Miramar.

The City of Santee was originally a rural development with dairies, ranches, and vineyards. The area experienced steady population growth from the 1950s into the 1970s, and increased industrial and commercial expansion throughout the 1980s after the City's official incorporation in December 1980. As of 2016, the City had a population of approximately 57,834.[1]

Developed land currently accounts for approximately 58 percent of the total area within the City, with an opportunity for growth on the remaining 42 percent of vacant lands. Most developed land in the City is occupied with residential uses (49%), including both single-family and multiple-family residences. Single-family residences are over one-third of the total developed acreage in the City, and are particularly dominant north of the San Diego River. Public/Semi-Public land uses comprise 21 percent of developed area in the City and include schools, public and private parks, and churches. Commercial uses account for approximately 6 percent of developed area and are concentrated at the intersection of Mission Gorge Road and Cuyamaca Street, in the southern limits of the City, as well as along major City arterials. Industrial uses are approximately 5 percent of developed area and are found north of SR-67 in the east and along SR-52 in the south.

East-west travel within the City is accommodated by Prospect Avenue, Mast Boulevard, Mission Gorge Road, and SR-52, while north-south travel is primarily accommodated by SR-67, SR-125, Magnolia Avenue, and Cuyamaca Street. Mass transit for the City includes Metropolitan Transit System bus service and the San Diego Trolley, which connects Santee to downtown San Diego and the international border. As discussed in the Sustainable Santee Plan, the majority of Santee's GHG emissions (from past inventories and future projections) are attributed to transportation.

4.6.4 Regulatory Setting

4.6.4.1 Federal Policies and Regulations

There are no federal land use policies or regulations that are applicable to the proposed project with respect to land use regulation.

4.6.4.2 State Policies and Regulations

***CEQA Guidelines* Section 15183.5**. Tiering and Streamlining the Analysis of GHG Emissions, was added as part of the *CEQA Guidelines* amendments and describes the criteria needed in a Climate Action Plan (CAP) that would allow for the tiering and streamlining of CEQA analysis for subsequent development projects. The following quote is from the *CEQA Guidelines* amendments:

[1] United States Census Bureau. 2017. *Annual Estimates of the Resident Population: April 1, 2010 to July 1, 2016*. Website: https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk (accessed September 21, 2017).

Section 15183.5. Tiering and Streamlining the Analysis of Greenhouse Gas Emissions.

(a) Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce greenhouse gas emissions. Later project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review. Project-specific environmental documents may rely on an EIR containing a programmatic analysis of greenhouse gas emissions as provided in section 15152 (tiering), 15167 (staged EIRs) 15168 (program EIRs), 15175–15179.5 (Master EIRs), 15182 (EIRs Prepared for Specific Plans), and 15183 (EIRs Prepared for General Plans, Community Plans, or Zoning).

(b) Plans for the Reduction of Greenhouse Gas Emissions. Public agencies may choose to analyze and mitigate significant greenhouse gas emissions in a plan for the reduction of greenhouse gas emissions or similar document. A plan to reduce greenhouse gas emissions may be used in a cumulative impacts analysis as set forth below. Pursuant to sections 15064(h)(3) and 15130(d), a lead agency 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 or mitigation program under specified circumstances.

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;

(F) Be adopted in a public process following environmental review.

(2) Use with Later Activities. A plan for the reduction of greenhouse gas emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later projects. An environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. If there is substantial evidence that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the plan for the reduction of greenhouse gas emissions, an EIR must be prepared for the project.

One of the goals of the Sustainable Santee Plan is to allow programmatic level review and mitigation of GHG emissions that allows streamlining of CEQA review for subsequent development projects. To accomplish this, the Sustainable Santee Plan framework is designed to fulfill the requirements identified in *CEQA Guidelines* Section 15183.5, above.

Executive Order S-13-08, The Climate Adaptation and Sea Level Rise Planning Directive. EO S-13-08 provides clear direction for how the State should plan for future climate impacts. EO S-13-08 calls for the implementation of four key actions to reduce the vulnerability of California to climate change:

- Initiate California's first statewide Climate Adaptation Strategy (CAS) that will assess the State's expected climate change impacts, identify where California is most vulnerable, and recommend climate adaptation policies.
- Request that the National Academy of Sciences establish an expert panel to report on sea level rise impacts in California in order to inform State planning and development efforts.
- Issue interim guidance to State agencies for how to plan for sea level rise in designated coastal and floodplain areas for new and existing projects.
- Initiate studies on critical infrastructure and land use policies vulnerable to sea level rise.

California Code of Regulations Title 24, Part 6. CCR Title 24, Part 6 (California's Energy Efficiency Standards for Residential and Nonresidential Buildings) (Title 24) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy-efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

The Energy Commission adopted 2008 Standards on April 23, 2008, and the Building Standards Commission approved them for publication on September 11, 2008. These updates became effective on August 1, 2009. The Energy Commission adopted the 2008 changes to the Building Energy Efficiency Standards for several reasons:

- To provide California with an adequate, reasonably priced, and environmentally sound supply of energy.
- To respond to AB 32, the Global Warming Solutions Act of 2006, which mandates that California must reduce its GHG emissions to 1990 levels by 2020.
- To pursue California energy policy, which states that energy efficiency is the resource of first choice for meeting California's energy needs.
- To act on the findings of California's Integrated Energy Policy Report (IEPR) that concludes that the Standards are the most cost effective means to achieve energy efficiency, expects the Building Energy Efficiency Standards to continue to be upgraded over time to reduce electricity and peak demand, and recognizes the role of the Standards in reducing energy related to meeting California's water needs and in reducing GHG emissions.

- To meet the West Coast Governors' Global Warming Initiative commitment to include aggressive energy efficiency measures into updates of State building codes.
- To meet the Executive Order in the Green Building Initiative to improve the energy efficiency of nonresidential buildings through aggressive standards.

Senate Bill 375, Sustainable Communities Strategy. SB 375 provides for a new planning process that coordinates land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 requires regional transportation plans, developed by Metropolitan Planning Organizations to incorporate an SCS in their Regional Transportation Plans. The goal of the SCS is to reduce regional VMT through land use planning and consequent transportation patterns. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development.

4.6.4.3 Regional Policies and Regulations

San Diego Association of Governments. SANDAG is the Regional Transportation Commission and federally designated MPO for the San Diego region. SANDAG builds consensus, develops strategic plans, obtains and allocates resources, and provides information on a broad range of topics pertinent to the region's quality of life. As a regional Council of Governments, voting members of the association consist of the County of San Diego and the 18 cities in the region. SANDAG oversees the implementation of regional planning efforts that have included the Regional Comprehensive Plan, the Regional Transportation Plan, the Sustainable Communities Strategies, and San Diego Forward which are discussed below:

Regional Comprehensive Plan. The RCP was adopted by the SANDAG Board of Directors in 2004 and serves as the long-regional planning framework for the San Diego region. It provides a broad context in which local and regional decisions can be made that move the region toward a sustainable future with more choices and opportunities for all residents of the region. It sets forth a regional strategy to promote smarter growth, focusing on locating higher-density and mixed-use development close to existing and planned transportation infrastructure. This strategy focuses particularly on elevating the role of public transit in people's daily lives. The RCP is based upon three themes:

- Improving the connections between land use and transportation plans by using smart growth principles;
- Using land use and transportation plans to guide decisions about environmental and public facility investments; and
- Focusing on collaboration and incentives to achieve regional goals and objectives.

The RCP better integrates local land use and transportation decisions, and focuses attention on where and how to grow. The RCP contains an incentive-based approach to encourage and channel growth into existing and future urban areas and smart growth communities. The RCP identifies certain areas in the region as Smart Growth Opportunity Areas. Designation of these opportunity areas is intended to provide guidance to local governments, property owners, and service providers as to where smart growth development should occur from a regional perspective, and focuses attention on these areas as local jurisdictions update their general plans and redevelopment plans.

Once these areas are designated by local jurisdictions for development types, densities, and intensities consistent with the goals of the RCP, transportation facility improvements and other infrastructure will be targeted to these areas.

Regional Transportation Plan and Sustainable Communities Strategy. The SANDAG Board of Directors adopted the 2050 RTP and SCS on October 28, 2011. The 2050 RTP maps out a system designed to maximize transit enhancements, integrate biking and walking elements, and promote programs to reduce demand and increase efficiency. The RTP includes the SCS, which integrates land use, development of housing, and transportation planning. Pursuant to SB 375, each MPO is required to adopt an SCS as part of its RTP and, using the most recent planning assumptions, demonstrate achievement of the targets for reduction of GHGs. The 2050 RTP/SCS outlines projects for rail and bus services, highways, local streets, bicycling, and walking, as well as systems and demand management. The 2050 RTP/SCS shows how the region will meet the GHG targets for passenger cars and light-duty trucks established by the ARB for 2020 and 2035 by using land in a way that makes development more compact, conserves open space, and invests in a transportation network that reduces VMT and gives residents alternative transportation options.

San Diego Forward: The Regional Plan. The SANDAG Board of Directors adopted the San Diego Forward plan on October 9, 2015. This plan updates of the Regional Comprehensive Plan for the San Diego Region (RCP), updates the Regional Transportation Plan and updates the Sustainable Communities Strategy and combines these documents into one plan. The plan identifies the general location of uses, residential densities, and building densities within the region. It sets forth a forecasted transportation network and development pattern. Goals for this plan include reduced GHG emissions and improved air quality by creating transportation alternatives to the car.

4.6.4.4 Local Policies and Regulations

San Diego Multiple Species Conservation Program. The MSCP for San Diego County was adopted in 1997. The City of Santee, unincorporated portions of the County, and ten additional city jurisdictions make up the San Diego MSCP Plan area. The MSCP is a comprehensive conservation program that works to create a balance between preservation of natural resources and biodiversity, and future economic growth. The MSCP covers 900 square miles and focuses on conservation of 85 species. The MSCP allows local jurisdictions to maintain land use control and implement their respective portions of the MSCP through Subarea Plans. The City is drafting its Subarea Plan, which would preserve more than 2,600 acres in permanent open space and would aim to balance development needs with habitat conservation.[1]

City of Santee General Plan. The Santee General Plan provides long-term policy guidance for the physical, economic, and environmental growth in the City. California law requires that other local government programs be consistent with the General Plan. All City actions, such as zoning, subdivision and design review, redevelopment and capital improvements, and land use allocations must be consistent with the General Plan. The General Plan also designates land use categories within the City and includes information on the general uses, intensity, siting, development, and

[1] City of Santee. 2003. City of Santee General Plan Land Use Element. Adopted August 27, 2003. Website: http://cityofsanteeca.gov/home/showdocument?id=7199 (accessed September 25, 2017).

compatibility uses. General Plan elements for the City include Land Use, Housing, Circulation, Recreation, Trails, Conservation, Noise, Safety, and Community Enhancement. The General Plan elements provide guidance on how other City programs and activities should be changed or strengthened to best implement its policies. The Sustainable Santee Plan does not provide for specific development and simply establishes programs and measures to reduce GHGs. Specific development projects would be required to be consistent with all applicable policies and implementation programs of the General Plan on a project level.

Below are selected policies of the General Plan that relate to the proposed project. Below each policy is the Measure from The Sustainable Santee Plan that is consistent with the General Plan policy.

Land Use Element (LU)

LU Objective 3.0 Provide and maintain the highest level of service possible for all community public services and facilities.

LU Policy 3.1 The City should ensure that land divisions and developments are approved within the City only when a project's improvements, dedications, fees and other revenues to the City and other agencies fully cover the project's incremental costs to the City and other agencies. These costs are for providing new or upgraded capital improvements and other public facilities and equipment resulting from, and attributable to the project, which are necessary to protect and promote the public's health, safety and welfare and to implement feasible mitigation measures. Such facilities include, but are not limited to, parks, bridges, major roads, traffic signals, streetlights, drainage systems, sewers, water, flood control, fire, police, schools, hiking/bicycle trails and other related facilities. In calculating benefits of land divisions and developments, the City may consider other public objectives and goals including social, economic (job creation, secondary economic benefits, etc.) and environmental factors.
Sustainable Santee Plan – Measures 2.1, 4.1, 6.1, 7.1, 9.1, ~~9.2~~ and 10.1

LU Policy 3.2 The City should encourage the development and use of recycled water for appropriate land uses to encourage the conservation of, and reduce demand for, potable water.
~~Sustainable Santee Plan – Measures 5.1 and 5.2~~

LU Policy 3.6 Development projects shall be reviewed to ensure that all necessary utilities are available to serve the project and that any land use incompatibilities or impacts resulting from public utilities shall be mitigated to the maximum extent possible.
Sustainable Santee Plan – Measures 1.1, 2.1, 3.1, 4.1 ~~1.2, 1.3, 1.4, 5.1, 8.1 and~~ 10.1 and 10.2

LU Objective 4.0 **Provide for the development of conveniently located neighborhood shopping centers.**

LU Policy 4.3 The City should locate new neighborhood commercial uses along major roadways in consolidated centers that utilize common access and parking for commercial uses, discourage the introduction of strip commercial uses and require adequate pedestrian links to residential areas.
Sustainable Santee Plan – Measure~~s~~ 6.1~~7.1, 7.2 and 7.5~~

LU Objective 11.0 **Ensure that development in the City is consistent with the overall community character and contributes positively toward the City's image.**

LU Policy 11.1 The City shall ensure that all requirements set forth within the Community Enhancement Element are implemented during the development review process.
Sustainable Santee Plan – Goals 1, 2, 3, 4 and Measures 6.2, ~~9.1, 9.2,~~ and 10.1

Mobility Element (MB)

MB Objective 1.0 **Ensure that the existing and future transportation system is accessible, safe, reliable, efficient, integrated, convenient, well-connected and multi-modal. The system will accommodate active transportation, and accommodate people of all ages, including pedestrians, disabled bicyclists, users of mass transit, motorists, emergency responders, freight providers and adjacent land uses.**

MB Policy 1.1 The City shall provide integrated transportation and land use decisions that enhance smart growth development served by complete streets which facilitate multimodal transportation opportunities.
Sustainable Santee Plan – Measures ~~7.1, 7.2, 7.5, and 10.1~~ 6.1 and 6.2

MB Policy 1.3 The City shall ensure that the entire right of way is designed to accommodate appropriate modes of transportation.
Sustainable Santee Plan – Measures ~~7.1, 7.2, and 7.5~~ 6.1 and 6.2

MB Policy 1.4 The City should create a vibrant town center by developing a connected system of multi-modal corridors that encourage walking, biking, and riding transit. A mobility hub should be considered at the existing Santee Trolley Square providing features such as bike share, bike parking, car share, neighborhood electric vehicles real-time traveler information, demand-based shuttle service, wayfinding signage, bicycle and pedestrian improvements, urban design enhancements, etc.
Sustainable Santee Plan – Measures 6.1 ~~7.1, 7.2 7.5, 10.1,~~ M-~~4~~ 3.1, and M-~~4~~ 3.4

MB Objective 2.0 **Develop an efficient, safe and multimodal transportation network, consisting of local roads, collectors, arterials, freeways and transit services, in a manner that promotes the health and mobility of Santee residents and that meets future circulation needs, provides access to all sectors of the City and supports established and planned land uses.**

MB Policy 2.1 The City shall encourage an automobile Level of Service "D" on street segments and at intersections throughout the circulation network while also maintaining or improving the effectiveness of the non-automotive components of the circulation system (i.e. pedestrians, bicyclists, and public transit), especially in the Town Center area. The City may approve a lower automobile Level of Service if it finds that the effectiveness of non-automotive components of the circulation system would be maintained or improved as a result. In other cases, the City shall not approve any development that causes a drop in the level of service at a street segment or an intersection to LOS "E" or "F", after feasible mitigation, without overriding social, economic, or other benefits.
Sustainable Santee Plan – Measures 6.1, 6.2and 8.1 ~~7.1, 7.2, 7.5 and 7.6~~

MB Policy 2.9 The City should work with the region to develop traffic and congestion management programs to improve commute times and improve air quality.
Sustainable Santee Plan – Measures 6.1, 6.2 and 8.1~~7.1, 7.2, 7.5 and 7.6~~

MB Objective 3.0 **Upgrade and maintain Santee transportation corridors to meet the safety needs of all roadway users – including youth and elderly and travelers of varying physical abilities – and to provide a well-connected system throughout the City.**

MB Policy 3.5 The City shall encourage the use of innovative methods for traffic control (such as roundabouts, curb extensions, and traffic circles) where appropriate that add character, slow vehicle speeds, and create opportunity for improved aesthetics while effectively managing traffic
Sustainable Santee Plan – Measure~~s~~ 8.1~~7.1, 7.2 and 7.5~~

MB Objective 5.0 **Allow parking reductions around transit and affordable housing**

MB Policy 5.1 The City should consider reducing parking requirements in the town center area and at transit stations as transit ridership increases over time due to increased development intensities and a broader mix of land uses.
Sustainable Santee Plan – Measure~~s~~ 6.1 ~~7.1 and 10.1~~

MB Policy 5.2 The City should maximize shared parking opportunities for uses with varied peak parking periods.
Sustainable Santee Plan – Measures 7.1 and 10.1

MB Policy 5.3 The City should exercise flexibility in the application of parking standards to support transit-oriented development.
Sustainable Santee Plan – Measure~~s~~ 6.1 ~~7.1 and 10.1~~

MB Objective 6.0 Increase the use of public transit systems

MB Policy 6.1: The City should coordinate with SANDAG and MTS to maintain and enhance transit services in the City so that they are efficient, cost-effective, and responsive to growth and redevelopment.
Sustainable Santee Plan – Supporting Measures ~~7.1, 7.2, and 10.1~~

MB Policy 6.2 The City should coordinate with SANDAG and MTS to improve bus stop and shelter facilities to increase the comfort of users.
Sustainable Santee Plan – Supporting Measures ~~10.1~~

MB Policy 6.3 The City should coordinate with SANDAG and MTS to provide multi-modal support facilities and adequate access near and to/from transit stops for bicyclists and pedestrians, including children and youth, seniors, and persons with disabilities.
Sustainable Santee Plan – Supporting Measures ~~7.1 and 7.2~~

MB Policy 6.4 The City should coordinate with SANDAG and MTS to post route maps and pick-up/drop-off times at each stop.
Sustainable Santee Plan – Supporting Measures ~~7.1 and 7.2~~

MB Policy 6.5 The City should coordinate with MTS to encourage establishing transit stops in areas of concentrated activity such as near senior housing projects, medical facilities, major employment centers, and mixed use areas.
Sustainable Santee Plan – Supporting Measures ~~7.1, 7.2, and 7.5~~

MB Policy 6.6 The City should coordinate with MTS to accommodate transit centers and major stops with adequate bicycle and pedestrian access and secure bicycle storage where appropriate. Include facilities that are well designed, provide appropriate lighting and are safe, comfortable, and attractive.
Sustainable Santee Plan – Supporting Measures ~~10.1~~

MB Policy 6.7: The City should provide incentives for transit-oriented development, such as a parking reduction consistent with regional standards, for more intense development and higher density reside.
Sustainable Santee Plan – Measure ~~10~~ 6.1

MB Objective 7.0 Develop, maintain, and support a safe, comprehensive and integrated bikeway system that encourages bicycling, as documented in the City's Bicycle Master Plan (BMP).

MB Policy 7.1 The City shall continue to implement and maintain a comprehensive bicycle route system, and to designate appropriate bikeways through the regular update of the City's Bicycle Master Plan.
Sustainable Santee Plan – Measure ~~7~~6.2

MB Policy 7.2 The City should strive to achieve objectives and policies identified in the Bicycle Master Plan including those related to bicycle safety awareness, bicycle promotion, maintenance and monitoring. Educational awareness programs shall include an environmental component that teaches bicycle users the importance of staying on designated trails to minimize impacts to wildlife resources.
Sustainable Santee Plan – Supporting Measures ~~7.1 and 7.2~~

MB Policy 7.3 The City should promote the development of hiking and bicycle trails along the San Diego River in conjunction with the San Diego River Plan. Any plans for trails along the San Diego River shall be accompanied by a site-specific analysis, as required under CEQA, to confirm that such trails are consistent with the Subarea Plan (SAP) and located in the least environmentally sensitive areas.
Sustainable Santee Plan – Supporting Measures and Measure 6.2 ~~7.1 and 7.2~~

MB Policy 7.4 The City should require new development and redevelopment to provide connections to existing and proposed bicycle routes, where appropriate.
Sustainable Santee Plan – Measure~~s~~ 6.2 ~~7.1 and 7.2~~

MB Objective 8.0 Develop and maintain an accessible, safe, complete and convenient pedestrian system that encourages walking.

MB Policy 8.1 The City should require the incorporation of pedestrian-friendly design concepts where feasible including separated sidewalks and bikeways, landscaped parkways, traffic calming measures, safe intersection designs and access to transit facilities and services into both public and private developments.
Sustainable Santee Plan – Measure 6.1 ~~7.5~~

MB Policy 8.2 The City should provide for the connectivity of wide, well-lit sidewalks and environments with safety buffers between pedestrians and vehicular traffic, where feasible.
Sustainable Santee Plan – Measure 6.1 ~~7.5~~

MB Policy 8.3 The City should pursue the elimination of physical barriers around public facilities and commercial centers to improve access and mobility of the elderly and disabled in a manner consistent with the Title 24 of the California Code of Regulations and the federal Americans with Disabilities Act (ADA).
Sustainable Santee Plan – Measure 6.1 ~~7.5~~

MB Policy 8.4 The City shall require non-contiguous sidewalks on all streets with a residential collector classification or higher, as appropriate.
Sustainable Santee Plan – Measure 6.1 ~~7.5~~

MB Policy 8.5 The City should identify and implement pedestrian improvements with special emphasis on providing safe access to schools, parks, community and recreation centers, and shopping districts.
Sustainable Santee Plan – Measure 6.1 ~~7.5~~

MB Policy 8.6 The City should promote walking and improve the pedestrian experience by requiring pedestrian facilities along all classified streets designated on the Circulation Plan; by implementing streetscape improvements along pedestrian routes that incorporate such elements as shade trees, street furniture, and lighting; by orienting development toward the street; by employing traffic calming measures; and by enforcing vehicle speeds on both residential and arterial streets.
Sustainable Santee Plan – Measure 6.1 ~~7.5~~

MB Objective 9.0 Increased use of alternative modes of travel to reduce peak hour vehicular trips, save energy, and improve air quality.

MB Policy 9.1 The City shall encourage and provide for Ride Sharing, Park 'n Ride, and other similar commuter programs that eliminate vehicles from freeways and arterials..
Sustainable Santee Plan – Measures 6.1 and 6.2 ~~7.1 , 7.2, 7.5, and 7.6~~

MB Policy 9.3 The City should encourage employers to offer shared commute programs and/or incentives for employees to use transit.
Sustainable Santee Plan – Measure~~s~~ ~~7.1, 7.3 and~~ M-~~4~~3.1

MB Policy 9.4 The City should encourage the use of alternative transportation modes, such as walking, cycling and public transit. The City should maintain and implement the policies and recommendations of the Bicycle Master Plan and Safe Routes to School Plan to improve safe bicycle and pedestrian access to major destinations.
Sustainable Santee Plan – Measures 6.1 and 6.2. ~~7.1, 7.2, 7.3, 7.5 7.6, and M-4.1~~

MB Policy 9.5 The City should improve safety of walking and biking environment around schools to reduce school-related vehicle trips.
Sustainable Santee Plan – Measures 6.1 and 6.2. ~~7.2, 7.5, and 7.6~~

MB Objective 10.0 The City shall remain actively involved in regional issues.

MB Policy 10.1 The City should promote and support the continued expansion of the San Diego Trolley system which benefits residents of Santee, especially in higher density areas.
Sustainable Santee Plan – Measure~~s~~ 6.1 ~~7.1 and 7.2~~

Recreation Element (RC)

RC Objective 2.0 Provide adequate recreational acreage and facilities in all areas of the City.

RC Policy 2.2 The City shall encourage the inclusion of recreational facilities in all mixed land use developments, especially within the Town Center and the Fanita Ranch.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

Trails Element (TR)

TR Objective 1.0 Provide safe and viable regional and community trails within the City.

TR Policy 1.1 Priority should be placed on establishing multiple-use trails (pedestrians, bicyclists, equestrians) wherever feasible.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Policy 1.2 All new subdivisions or planned developments whether residential, commercial, or industrial which include proposed trail locations shall dedicate easements which will provide safe and direct access to community or regional trails, and provide for trail maintenance.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Policy 1.3 Regional and/or community routes within the City should link up with existing or proposed routes within neighboring jurisdictions.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Policy 1.4 There should be at least one east-west regional corridor extending from San Diego through Town Center to Lakeside and one north-south corridor extending from El Cajon through Town Center north to Fanita Ranch. The corridors should provide for, pedestrian, bicycle, and where feasible, equestrian use.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Policy 1.5 The City's trail network should link focal points of the City such as Town Center, Fanita Ranch, employment centers, schools, residential neighborhoods, parks and open space, and the San Diego River.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Policy 1.6 The City should continue to coordinate regional trail planning, acquisition and development efforts with adjacent jurisdictions.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Policy 1.7 The City should work with utility companies, special districts, school districts and others to provide trails through easements, dedications, joint use agreements or other means.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Objective 2.0 Provide trails which are designed to impact the environment as little as possible and which blend in with the character of the community.

TR Policy 3.1 Large non-residential developments should be encouraged to provide showers and lockers, flexible work schedules and other means to encourage and facilitate use of alternative modes of transportation by employees.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Policy 3.2 Bicycle racks should be made available at all new or rehabilitated nonresidential developments.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Objective 4.0 Provide promotional material which indicates the type and location of trails in Santee.

TR Policy 4.3 As routes are implemented, their availability and use should be encouraged through the City's website, newsletters or the media.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Policy 6.7 Encourage trail connections with planned trails on the Santee Lakes property and future development of Fanita Ranch.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Objective 8.0 Provide community trails that link with regional trail systems and facilities.

TR Policy 8.1 Encourage the establishment of trail systems in the East Elliot area and on the Fanita Ranch that link the Fanita Ranch and Mission Trails Regional Park with Santee Lakes and Goodan Ranch Regional Parks, Sycamore Canyon Open Space Preserve, and any future northern expansion of Mission Trails Regional Park.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

TR Policy 8.2 Encourage trail connections to the Trans-County trail system, the Upper San Diego River Improvement Plan, the Mission Trails Regional Park trail system and trails leading to Goodan Ranch and Sycamore Canyon Open Space Preserve.
Sustainable Santee Plan – Measures ~~7~~ 6.1 and ~~7~~ 6.2

Conservation Element (CS)

CS Objective 3.0 Maintain adequate domestic water supplies for all residents and use with the City.

CS Policy 3.1 The City should encourage the use of drought-resistant vegetation and encourage the use of recycled water for irrigation for both private development as well as public projects and facilities.
~~Sustainable Santee Plan – Measures 5.1, 5.2 and 6.1~~

CS Policy 3.2 The City shall encourage the development and utilization of innovative water conservation measures in all proposed developments.
~~Sustainable Santee Plan – Measures 5.1 and 5.2~~

CS Objective 7.0 Preserve Significant Biological Resources.

CS Policy 7.1 The City shall encourage the preservation and enhancement of significant biological resources in areas designated as permanent open space.
~~Sustainable Santee Plan – Measure 6.3~~

CS Policy 7.2 The City shall require that all development proposals provide appropriate mitigation for identified significant biological resources including selective preservation, sensitive site planning techniques and in-kind mitigation for identified impacts.

~~Sustainable Santee Plan – Measure 6.3~~

CS Policy 7.3 The City shall require that, for all development proposals involving the setting aside of land for permanent open space either on-site or off-site, provisions are in place to ensure the long-term management of the open space and biological resources.
~~Sustainable Santee Plan – Measure 6.3~~

CS Policy 7.4 The City shall complete a Multiple Species Conservation Program Subarea plan that conserves a minimum of 2,600 acres in the City as permanent open space for preservation of habitats and species.
~~Sustainable Santee Plan – Measure 6.3~~

Community Enhancement Element (CE)

CE Objective 4.0 Promote the integration of new residential development with the existing community.

CE Policy 4.2 The City shall ensure that new residential development is adequately linked to the existing community by streets, sidewalks, trails and bikeways.
Sustainable Santee Plan – Measures 6.1 and 6.2 ~~7.1, 7.5~~

CE Objective 9.0 Provide a unifying and distinctive streetscape system throughout the City.

CE Policy 9.10 The City should promote a community tree forestry program, using the resources of the Tree USA program or other similar programs that encourage citywide tree plantings
Sustainable Santee Plan – Supporting Measures and Measure 5.1 ~~5.1, 6.1~~

CE Objective 17.0 Balance development with natural resource protection needs.

CE Policy 17.1 The City should provide for the preservation of significant habitat and vegetation in strategic locations along watercourses and in undeveloped hillside areas.
~~Sustainable Santee Plan – Measure 6.3~~

CE Policy 17.2 The City should promote the incorporation of unique and significant natural resource features (vegetation, habitat, rock outcrops) into development plans.
~~Sustainable Santee Plan – Measure 6.3~~

Town Center Specific Plan. In October 1986, the City of Santee completed a focused effort to plan for the development of property in its geographic core. The Town Center Specific Plan establishes guidelines for creating a people- and transit-oriented hub for commercial, civic, and residential uses

along the San Diego River. The Santee Town Center Specific Plan is designed to protect and enhance the natural features of the Town Center site, especially the San Diego River. The Specific Plan is oriented toward establishing a land use and design framework, which can cohesively tie the new downtown together. The plan establishes a river and water-oriented theme with landscaped boulevards, biological preserves, and defined scale and bulk of buildings.[1]

San Diego River Park Master Plan. The San Diego River Park Master Plan provides a vision and guidance for development within a half-mile for a 17.5-mile section of the San Diego River starting within the boundaries of the City of San Diego extending from the Pacific Ocean and extending into the City of Santee. The plan provides guidance on how to restore the relationship between the river and surrounding communities making it an asset through the added environmental, social and cultural, and economic value added to a community. The San Diego River Park Master Plan is a policy document and includes visions, principles, recommendations and implementation strategies.[2]

Gillespie Field Airport Land Use Compatibility Plan. The Gillespie Field ALUCP, adopted in 2010 by the San Diego County Regional Airport Authority, is intended to promote airport land use compatibility. Specifically, the ALUCP (1) provides for the orderly growth of the airport and the area surrounding the airport; and (2) safeguards the general welfare of the inhabitants within the vicinity of the airport and the public in general (Pub. Util. Code §21675(a)). The ALUCP serves as a tool for the San Diego County Regional Airport Authority to use in to review land use plans and development proposals within the AIA at the airport. In addition, this ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of general plans[3] and to landowners in their design of new development. The ALUCP sets guidelines related to land use compatibility, aircraft noise impacts, height protection, and airport safety to ensure land use compatibility.

MCAS Miramar Airport Land Use Compatibility Plan. The MCAS Miramar ALUCP, adopted in 2008 (and as amended in 2011) by the San Diego County Regional Airport Authority, is the fundamental tool used by the San Diego County Regional Airport Authority to promote airport land use compatibility. Specifically, this ALUCP (1) provides for the orderly growth of the airport and the area surrounding the airport; and (2) safeguards the general welfare of the inhabitants within the vicinity of the airport and the public in general. The ALUCP serves as a tool to review land use development proposals within the AIA at MCAS Miramar. In addition, the ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development. The ALUCP sets guidelines related to land use compatibility, aircraft noise impacts, height protection, and airport safety to ensure land use compatibility.

City of Santee Municipal Code. Title ~~17~~ 13, Zoning, of the SMC includes site development criteria, as well as design guidelines, for development projects within the City. Among the aspects of

1 City of Santee. 1986. *Town Center Specific Plan*. October. http://cityofsanteeca.gov/services/development-services/planning-and-zoning-services/town-center-specific-plan.

2 City of San Diego. 2013. San Diego River Park Master Plan. Website: https://www.sandiego.gov/sites/default/files/sdrp_master_plan_full.pdf (accessed September 26, 2017).

3 Policy 2.2.21 of the ALUCP defines general plans to include any general plan, community plan, specific plan, zoning ordinance, building regulation, land use policy document, or implementing ordinance.

development regulated by the SMC are types of allowable land uses, setback and height requirements, solar, landscaping, walls, fencing, signage, access, parking requirements, storage areas, and trash enclosures. The SMC also provides development review criteria and procedures to determine the development projects' consistency with the Zoning Code, Municipal Code, and the General Plan.

4.6.5 Proposed Sustainable Santee Plan - Goals and Measures

The above discussion on the General Plan delineates how the Goals and Measures of Sustainable Santee Plan are consistent with the General Plan.

4.6.6 Impact Significance Criteria

The thresholds for land use and planning impacts used in this analysis are consistent with Appendix G of the *CEQA Guidelines*. The effects of the proposed project on ~~aesthetics~~ land use are considered to be significant if the proposed project would:

Threshold 4.6.1: Physically divide an established community;

Threshold 4.6.2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; or

The IS, provided in Appendix A, determined that the proposed project would not result in impacts associated with Threshold 4.6.1. As a result, this threshold is not considered any further in the analyses of the potential impacts of the proposed project related to land use and planning.

4.6.7 Project Impacts

Threshold 4.6.2: *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Several regionally and locally adopted land use plans, policies, and regulations would be applicable to development under the proposed Sustainable Santee Plan. These include SANDAG's Regional Comprehensive Plan, the San Diego County's Regional Air Quality Strategy and the State Implementation Plan, the City of Santee Zoning Code, the Town Center Specific Plan, the MCAS Miramar Airport Land Use Compatibility Plan, the Gillespie Field Airport Land Use Compatibility Plan, and the San Diego River Park Master Plan.

To fulfill the purposes of the Sustainable Santee Plan, the City identified the following goals:

- Goal 1: Increase Energy Efficiency in Existing Residential Units.
- Goal 2: Increase Energy Efficiency in New Residential ~~Existing Commercial~~ Units.
- Goal 3: Increase Energy Efficiency in Existing Commercial Units ~~through Water Efficiency~~.
- Goal 4: Increasing Energy Efficiency in New Commercial Units ~~Decrease Energy Demand through Reducing Urban Heat Island Effect~~.

- Goal 5: Decreasing Energy Demand through Reducing Urban Heat Island Effect ~~Increasing Energy Efficiency through Water Efficiency.~~
- Goal 6: Decrease GHG Emissions through Reducing Vehicle Miles Traveled ~~Decreasing Energy Demand through Reducing Urban Heat Island Effect~~ .
- Goal 7: Increase Use of Electric Vehicles ~~Decrease GHG Emissions through Reducing Vehicle Miles Traveled~~.
- Goal 8: Improve Traffic Flow ~~Decrease GHG Emissions through Reducing Solid Waste Generation~~.
- Goal 9: Decrease GHG Emissions through Reducing Solid Waste Generation ~~Decrease GHG Emissions through Increasing Clean Energy Use.~~
- Goal 10: Decrease GHG Emissions through Increasing Clean Energy Use. ~~Decrease GHG Emissions from New Development through Performance Standards.~~
- ~~Goal M-1: Participate in Education, Outreach, and Planning Efforts for Energy Efficiency.~~
- Goal M-1~~2~~: Increase Energy Efficiency in Municipal Buildings.
- Goal M-2~~3~~: Increase Energy Efficiency in Community Buildings and Infrastructure.
- Goal M-3~~4~~: On-Road Energy Efficiency Enhancements; Employee Commute and Vehicle Fleet.
- Goal M-4~~5~~: Reduce Energy Consumption in the Long Term.

Supporting Measures

☐ Designate a Sustainable Program Manager to oversee implementation of the Sustainable Santee Plan.

☐ Within six months of adoption of the Sustainable Santee Plan, establish a City webpage dedicated to the Sustainable Santee Plan that provides information to residents, businesses, and project applicants related to the plan, including but not limited to:

- Financial incentives for reducing energy use, such as home upgrades through the HERO program, the California Solar Initiative, the Property-Assessed Clean Energy (PACE) program, and rainwater harvesting rebates;
- Process for obtaining Tier 1 and Tier 2 Green Building Ratings such as LEED, Build It Green/Green Point Rating System, or Energy Star® certified buildings;
- Programs and incentives to facilitate the installation of EV-chargers;
- Updates to Title 24;
- Measures and opportunities to reduce, reuse, and recycle waste;
- Available ridesharing programs and school bus services and the benefits of both;
- Programs and events in Santee promoting energy efficiency and sustainability;
- Options for obtaining an energy audit for residences and businesses, such as through Energy Upgrade California;

- Training opportunities offered by City, SDG&E and other entities on reducing energy and fuel use; and
- Application of the Sustainable Santee Consistency Checklist for new development.
- Application and tracking of the Screening Tables for new development

☐ Within six months of adoption of the Sustainable Santee Plan, establish an email recipient list for Santee residences, business, and interested persons to provide periodic email updates on the Sustainable Santee Plan and information on ways to facilitate its goals.

☐ On or before December 2020:

- Establish online permitting to facilitate upgrades to residences and businesses;
- Update the City's official street tree list to include more water-efficient varieties;
- Update the Zoning Ordinance to add clarity on desired recreational amenities in multifamily complexes to replace the previously desired pool and water features;
- Conduct a municipal energy audit, and continue to do so every two years, to inform City staff on municipal energy use and opportunities for improvement;
- Conduct a study to evaluate the feasibility of installing EV charging stations on City property;
- Upgrade or incorporate water-conserving landscape at City facilities, to the extent feasible; and
- Plant trees in City-owned spaces to reduce urban heat island effect and building energy use and increase carbon sequestration, to the extent feasible.

☐ Track energy efficiency retrofits of existing residential and commercial land uses within the City through the permit application process.

☐ Track LEED and Energy Star participation of new construction within the City through the permit application process.

Policies in the applicable land use plans identified above are designed to promote sustainability in land use planning. For example, SANDAG's RCP sets forth a regional strategy to promote smarter growth, focusing on locating higher-density and mixed-use development close to existing and planned transportation infrastructure. Additionally, the RTP provides the framework for how the region will meet the GHG targets for passenger cars and light-duty trucks established by the ARB for 2020 and 2035 by using land in a way that makes development more compact, conserves open space, and invests in a transportation network that reduces VMT and gives residents alternative transportation options. The San Diego Air Pollution Control District's RAQS and the SIP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the SDAB. The RAQS relies on information from the ARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then establish the strategies necessary for the reduction of emissions through regulatory controls. The ARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County as part of the development of their general plans. The SIP relies on the same information from SANDAG to develop emissions inventories and emissions reduction strategies that are included in the attainment demonstration for the SDAB. As such, projects that propose development consistent with the growth anticipated by the general plans would be

consistent with the both San Diego Air Pollution Control District's RAQS and the SIP. The Sustainable Santee Plan establishes goals and policies that incorporate environmental responsibility into its daily management of its community and municipal operations. The Sustainable Santee Plan will further the goals and standards of the regional plans with regard to air quality, investing in a transportation network that reduces VMT and giving residents alternative transportation options by implementing measures and programs to reduce energy use, water use, and GHG emissions, and that support alternative modes of transportation and ride sharing.

The goals of the General Plan promote sustainability. The SMC also provides development review criteria and procedures to determine the development projects' consistency with the Zoning Code, Municipal Code, and the General Plan. The Sustainable Santee Plan is a separate document from the General Plan and establishes goals and policies that incorporate environmental responsibility into its daily management of its community and municipal operations. The Sustainable Santee Plan will further the goals and policies of the General Plan with regard to energy and water conservation, efficient multi-modal transportation network, and encouraging commuter programs by implementing measures and programs to reduce energy use, water use, and GHG emissions, and that support alternative modes of transportation and ride sharing.

The goals of the MSCP are to conserve biological resources in land use planning, which can be achieved, in part, by locating development outside of sensitive biological areas. The Town Center Specific Plan establishes guidelines for creating a people- and transit-oriented hub for commercial, civic and residential uses along the San Diego River. The San Diego River Park Master Plan provides guidance on how to restore the relationship between the river and surrounding communities making it an asset through environmental, social and cultural, and economic value added to a community. Both the Gillespie Field and MCAS Miramar ALUCPs set guidelines related to land use compatibility, aircraft noise impacts, height protection, and airport safety to ensure land use compatibility.

The Sustainable Santee Plan does not propose any specific development. Any future development projects that would implement Sustainable Santee Plan measures and actions would be subject to all applicable City regulations and requirements, including the General Plan and Specific Plans, as well as HCPs and ALUCPs, and additional CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainable Santee Plan. Therefore, implementation of the Sustainable Santee Plan would not result in any conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. Impacts would be less than significant.

As discussed under **Threshold 4.3.6**, once the Sustainable Santee Plan is adopted, any future development projects that would implement Sustainable Santee Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainable Santee Plan. Therefore, implementation of the Sustainable Santee Plan would not result in any conflict with approved conservation plans. Impacts would be less than significant.

4.6.8 Level of Significance Prior to Mitigation

All potential impacts related to land use and planning would be less than significant.

4.6.9 Mitigation Measures

The proposed project would not result in any significant adverse impacts related to land use and planning. No mitigation is required.

4.6.10 Level of Significance after Mitigation

There would be no significant unavoidable adverse impacts of the proposed project related to land use and planning.

4.6.11 Cumulative Impacts

The geographic context for land use impacts with respect to consistency with applicable land use plans is the City of Santee, which assumes full buildout of the City's General Plan, potential amendments to the General Plan, in the amount of 2,000 dwelling units, and implementation of the HCPs and ALUCPs located within in the City's limits.

While the City of Santee is part of the larger SANDAG region, compliance with SANDAG policies is voluntary, and individual municipalities are not required, although they aim to, conform to SANDAG policies. In addition, land use decisions are subject to the jurisdiction of the San Diego Air Pollution Control District, which implements the air quality regulations for the region. All development in this geographic context is required to be consistent with the applicable General Plan, and any inconsistencies with the HCPs, ALUCPs and air quality regulations must be identified as impacts in the environmental analysis.

It is anticipated that development in general will be reviewed for consistency with adopted land use plans and policies by the City of Santee, in accordance with the requirements of CEQA, the State Zoning and Planning Law, and the State Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. This Sustainable Santee Plan relates to GHG emission reductions and comprehensively evaluates GHG emissions stemming from land use decision and would track development to ensure consistency with the plan. The cumulative impacts of the ~~Sustainability~~ Sustainable Santee Plan on future development and land uses would not be significant.

Because the Sustainable Santee Plan is consistent with the policies of the City of Santee General Plan, the cumulative impact of the Sustainable Santee Plan with respect to consistency with land use plans would be less than significant.

4.7 WILDFIRE

This section provides a discussion of wildfire within the City and surrounding area, existing regulations pertaining to wildfire, and an analysis of potential impacts to occur as a result of the on the proposed Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions ("Sustainable Santee Plan" or "proposed project").

4.7.1 Scoping Process

At the time of publication of the NOP for the proposed project in August 2017, the State CEQA Guidelines, Appendix G (Environmental Checklist) did not include a Wildfire section and therefore the thresholds identified below were not evaluated. An analysis of Wildfire has been added to this PEIR.

4.7.2 Existing Environmental Setting

The City of Santee is located adjacent to undeveloped areas primarily along the north and west boundaries. The City contains areas that have been designated as Very-High Fire Hazard Severity Zones (VHFHSZ). In Figure 4.7.1, the Very High Fire Hazard Severity Zones are shown in red.

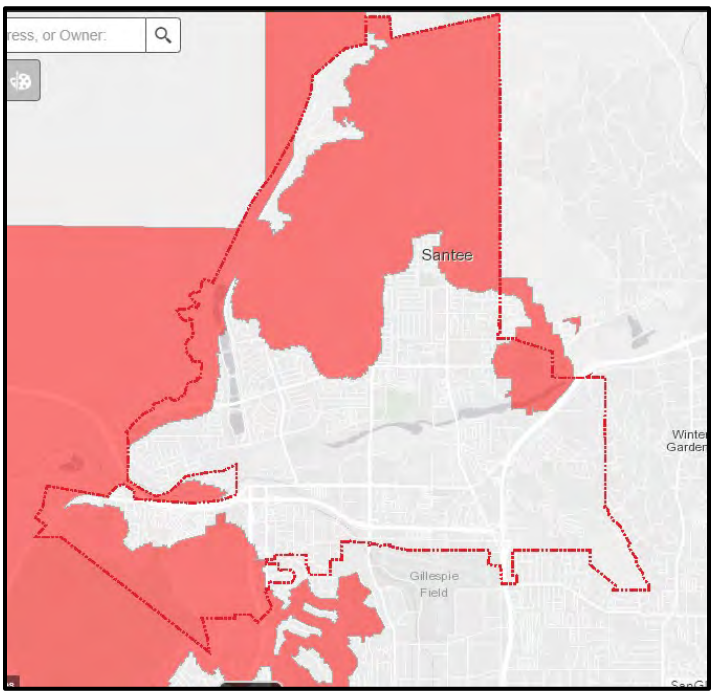

Figure 4.7.1 Very High Fire Hazard Severity Zones

As shown, the VHFHSZ are located in the southwest portion of the City near Mission Trails Regional Park and in the north part of the City near MCAS Miramar and Gooden Ranch/Sycamore Canyon County Preserve. Another portion is located around Rattlesnake Mountain near the development called Sky ranch.

4.7.3 Regulatory Setting

4.7.3.1 Federal Policies and Regulations

There are no federal wildfire policies or regulations that are applicable to the proposed project with respect to wildfire prevention.

4.7.3.2 State Policies and Regulations

California Fire Code, Chapter 47. Provides directions for new development located within the Wildland Urban Interface (WUI) or Fire Hazard Severity Zones

California Building Code, Chapter 7A. Provides guidance for building materials used in new buildings located within the Wildland Urban Interface (WUI) or Fire Hazard Severity Zones.

4.7.3.3 Local Policies and Regulations

Chapter ~~15.20~~ 11.18 of the Santee Municipal Code adopts the current version of the California Fire Code and adds additional amendments for fire protection in Santee, ordinances and to landowners in their design of new development. This section includes additional protections for properties located in Fire Hazard Severity Zones to include requirements for spark arrestors on chimneys, requirements for non-combustible fences, and limitations on the outdoor storage of firewood.

4.7.4 Proposed Sustainable Santee Plan Goals and Measures

The following proposed Goals and Measures are applicable to the analysis of wildfires:

- ~~Goal 5: Increase Energy Efficiency in New Commercial Units~~

  ~~5.1: Water Efficiency through Enhanced Implementation of SB X7-7~~
- Goal ~~6~~5: Decrease Energy Demand through Reducing Urban Heat Island Effect

  ~~6~~ 5.1: Tree Planting for Shading and Energy Efficiency

  ~~6.2: Carbon Sequestration through Preservation of Natural Lands~~

Potential Impacts

Goal 5 ~~and 6~~ along with actions associated with Measure~~s~~ 5.1 ~~and 6.1~~ would generate the planting of additional trees. ~~A~~ Supporting ~~Measures 6.2 would encourage the preservation of natural lands to assist in carbon sequestration.~~

4.7.5 Impact Significance Criteria

The following thresholds are based on Appendix G of the *CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant impact related to wildfire if located in or near state responsibility areas or lands classified as very high fire severity zones:

Threshold 4.7.1: Substantially impair an adopted emergency response plan or emergency evacuation plan?

Threshold 4.7.2: 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?

Threshold 4.7.3: 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?

Threshold 4.7.4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

4.7.6 Project Impacts

Threshold 4.7.1: *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The Sustainable Santee Plan is a policy document and which does not impair an adopted emergency response or emergency evacuation plan. Any future development projects that would implement the proposed project would be subject to all applicable City regulations, reviews, and requirements pertaining to emergency response, emergency access, and maintaining emergency evacuation routes. Impacts would be less than significant.

Threshold 4.7.2: *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

The Sustainable Santee Plan is a policy document that does not include any site specific designs or proposals and does not propose to grant any entitlements for development that would have the potential to expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Any future development projects that would implement ~~Sustainability~~ Sustainable Santee Plan measures and actions would be subject to all applicable City regulations, reviews, and requirements pertaining to emergency response, emergency access, and maintaining emergency evacuation routes, as well as further CEQA analysis of project-specific impacts. Among the wildfire resistive measures available for new development using the Sustainable Santee Plan include: additional insulation requirements, credit for using recycled water, and reduced vehicle trips (reduced spark incidence). No specific aspects of the activities contemplated to implement the Sustainable Santee Plan will alter the slope, prevailing winds, or any other facts that would increase exposure to Santee residents, employees or visitors to increased pollutant concentrations from wildfire. Impacts would be less than significant.

Threshold 4.7.3: *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, require the installation or maintenance of associated infrastructure (such as*

roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The Sustainable Santee Plan is a policy document that is designed to reduce GHG emissions. Measures 5.1 and 6.1 encourage the planting of trees to reduce the Urban Heat Island effect. This effect is the increased temperatures and humidity caused by the pavement and building in already developed areas. Tree planting would be in the more developed areas of Santee and not necessarily in the Very High Fire Hazard Severity Zones located at the periphery of the City. Additionally, any new trees would be water efficient and drought resistive types and would not add to fuel capacity. Therefore, the impact of tree plantings envisioned by the project would have a less than significant effect.

Threshold 4.7.4: *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The Sustainable Santee Plan is a policy document that is designed to reduce GHG emissions. The project would not create a development that would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The types of projects contemplated and encouraged by the Sustainable Santee Plan include building retrofits and the installation of solar panels, and these types of projects would not result in increased runoff, post-fire slope instability, or changes in drainage patterns. Further, all future development implementing the Sustainable Santee Plan would be subject to all existing building codes and development standards in place to control for runoff, instability, and drainage issues. Impacts would be less than significant.

4.7.7 Level of Significance Prior to Mitigation

All potential impacts related to wildfire would be less than significant.

4.7.8 Mitigation Measures

The proposed project would not result in any significant adverse impacts related to wildfire. No mitigation is required.

4.7.9 Level of Significance After Mitigation

There would be no significant unavoidable adverse impacts of the proposed project related to wildfire.

4.7.10 Cumulative Impacts

New development would be required to achieve energy efficiencies and existing development would achieve greater energy efficiencies are among the benefits of the proposed project. The cumulative effective of the Sustainable Santee Plan is reduced GHG emission as compared to the City without the proposed project. No cumulative impact would occur relating to wildfire risk.

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5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act requires that an EIR include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives" (*CEQA Guidelines*, Section 15126.6). This chapter identifies potential alternatives to the proposed *Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions* ("Sustainable Santee Plan" or "proposed project") and evaluates them as required by CEQA.

Key provisions of the *CEQA Guidelines* on alternatives (Section 15126.6[b] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly (15126.6[b]).
- The specific alternative of "no project" shall also be evaluated along with its impact (15126.6[e][1]). The "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (15126.6[e][2]).
- The range of alternatives required in an EIR is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent) (15126.6[f]).
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (15126.6[f][2][A]).
- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include the reasons in the EIR. For example, in some

cases, there may be no feasible alternative locations for a geothermal plant or mining project, which must be in close proximity to natural resources at a given location (15126.6[f][2][B]).

- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (15126.6[f][3]).

5.2 PROJECT OBJECTIVES

As stated in Section 3.0, Project Description, the objectives set forth below have been established for the Sustainable Santee Plan and would aid decision-makers in their review of the proposed project and its associated environmental impacts:

1. Present the City's plan for achieving sustainability by utilizing resources effectively, reducing GHG emissions, and preparing for potential climate-related impacts.
2. Identify how the City will effectively implement this proposed project by obtaining funding for program implementation, and tracking and monitoring the progress of Sustainable Santee Plan implementation over time.
3. Allow streamlined CEQA compliance for new development by preparing a PEIR for the Sustainable Santee Plan and developing ~~screening~~ tools that provide clear guidance to developers and other project proponents.
4. Maintain economic competitiveness within the region.

5.3 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS IDENTIFIED FOR THE PROPOSED PROJECT

No significant unavoidable adverse impacts were identified for the proposed project.

5.4 ALTERNATIVES UNDER CONSIDERATION

Section 21100 of the Public Resources Code and Section 15126.6 of the *CEQA Guidelines* require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the proposed project and that would avoid or substantially lessen any of the significant environmental impacts.

Public comments during the Notice of Preparation and Scoping Meeting focused on including an analysis of a Sustainable Santee Plan that accelerated the reduction of greenhouse gases to try and achieve a carbon-neutral goal for the City by 2030. To facilitate this analysis, the Accelerated Reduction Program Alternative was selected to evaluate how this alternative might avoid or lessen environmental impacts.

Therefore, the alternatives considered in this EIR consist of the following:

- **Alternative 1: No Project.** The No Project Alternative represents a continuation of development occurring under the City's existing General Plan (adopted in 2003) without the adoption of the Sustainable Santee Plan.

- **Alternative 2: Accelerated Reduction Program Alternative.** This alternative would include more aggressive GHG reduction goals that match the State's 2050 goal to be implemented by 2030.

5.4.1 Alternative 1: No Project/No Plan Alternative

5.4.1.1 Description of Alternative

The Sustainable Santee Plan will be used together with the City's General Plan to guide sustainable development into the future. Therefore, this alternative analyzes the environmental effects that could occur if the Sustainable Santee Plan were not implemented and development proceeded under the existing General Plan. Only those issue areas that are discussed in the EIR technical sections are analyzed below.

While the General Plan includes several policies related to resource conservation, it lacks the specificity of program development contained in the Sustainable Santee Plan. Under the No Project Alternative, strategies and actions that implement those policies would not be implemented. Measures that would result in the creation of a Bicycle Master Plan (Measure ~~5~~6.2) and traffic signal and outdoor lighting retrofits (Measure M-~~3~~2.1) would not be implemented. Other actions that would increase building energy efficiency and water use efficiency would not be implemented, and efforts to reduce waste would be less intensive and less coordinated. Overall, the No Project Alternative would result in fewer actions and measures to reduce GHG emissions and less coordinated and presumably less effective implementation of the General Plan's goals and policies to address climate change.

Without the Sustainable Santee Plan, it is uncertain whether the City would achieve its GHG reduction targets of 15 percent below 2005 levels by year 2020 and 49 percent below 2005 levels by the year 2035. Under the No Project Alternative, emissions reductions would occur with implementation of legislation adopted at the State level; however, there would likely be a gap in emissions reduction potential, which the Sustainable Santee Plan is intended to fulfill.

Aesthetics. Development would continue to occur under the existing General Plan, without implementation of the proposed project. Future development would not result in degradation of visual character or quality of the City, as all development would be required to comply with Santee municipal development review criteria and procedures to determine the development projects' consistency with the Zoning Code, Municipal Code, and General Plan. Among the aspects of development regulated by the Santee Municipal Code are types of allowable land uses, setback and height requirements, solar, landscaping, walls, fencing, signage, access, parking requirements, storage areas, and trash enclosures. Thus, the impact from future development on visual character and quality would be less than significant, similar to the proposed project. Additionally, while the Sustainable Santee Plan could result in glare from energy-generating structures, glare could also result from sharply reflected light caused by sunlight or artificial light reflecting from highly finished surfaces such as window glass or brightly colored surfaces, which could result from implementation of the General Plan. Therefore, similar to the proposed project, implementation of the General Plan could require mitigation measures to reduce the impacts of glare.

Air Quality. Development would occur under the existing General Plan, without implementation of the proposed project. The current AQMP relies on information from the ARB and SANDAG. The ARB

mobile source emissions projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County as part of the development of their general plans. As such, projects that propose development consistent with the growth anticipated by the general plans would be consistent with the AQMP and SANDAG regional plans. The Sustainable Santee Plan is intended to reduce greenhouse gas emissions in compliance with AB 32 and subsequent State legislation. Specific measures would be implemented that are in addition to the policies in the General Plan and would facilitate achievement of this goal. Without implementation of the Sustainable Santee Plan, there would be less formalized citywide guidance to reduce greenhouse gas emissions. While these reduction strategies were formulated to reduce greenhouse gases, they also act to improve overall air quality by reducing emissions of criteria pollutants. The goals and measures of the Sustainable Santee Plan being incorporated at the City level provide additional reductions in greenhouse gas emissions and improvements in air quality. Thus, while this alternative would not conflict with or obstruct implementation of the applicable air quality plan, it would have less of a beneficial effect compared to the proposed project.

Biological Resources. Development would occur under the existing General Plan, without implementation of the proposed project. Future development would not result in conflicts with provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP, as once the Subarea Plan is adopted, any future development projects that would implement the General Plan would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts. Thus, the impact from future development conflicting with habitat conservation plans would be less than significant, similar to the proposed project.

Greenhouse Gas Emissions. The Sustainable Santee Plan is intended to reduce greenhouse gas emissions in compliance with AB 32 and the California Air Resources Board's Climate Change Scoping Plan. Specific measures would be implemented that are in addition to the policies in the General Plan that would facilitate achievement of this goal. Without implementation of the Sustainable Santee Plan, there would be less formalized citywide guidance to reduce greenhouse gas emissions. The Sustainable Santee Plan not only provides an emissions inventory and reduction measures, it provides a vehicle through the use of ~~screening tables~~ the CAP Consistency Checklist for determining the success of these measures and demonstrating compliance with the applicable State regulations. Without the Sustainable Santee Plan, there is no formal vehicle for demonstrating compliance with State law, even though existing City policies promote sustainability and would have the effect of reducing greenhouse gas emissions. Thus, this alternative would have less of a beneficial effect and could have a potentially significant impact related to greenhouse gas emissions compliance compared to the proposed project.

Hazards and Hazardous Materials. Development under the General Plan could still include structures in the ALUCP area of both Gillespie Field and MCAS Miramar Airports. Additionally, as described under Aesthetics, glare could also result from implementation of the General Plan, which could affect aircraft safety. Therefore, similar to the proposed project, all proposed development projects would require review by the San Diego County Regional Airport Authority to ensure continuing aircraft safety and implementation of the General Plan could also require mitigation measures to reduce the impacts of glare to less than significant.

Land Use and Planning. The current AQMP relies on information from the ARB and SANDAG. The ARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County as part of the development of their general plans. As such, projects that propose development consistent with the growth anticipated by the general plans would be consistent with the AQMP and SANDAG regional plans. Additionally, any future development projects that would implement General Plan would be subject to all applicable City regulations and requirements, including specific plans, as well as HCPs and ALUCPs, and additional CEQA analysis of project-specific impacts. Therefore, implementation of the General Plan would not result in any conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. However, without adoption of the aggressive reduction policies in the Sustainable Santee Plan, the City's General Plan may not be in compliance with State regulations to reduce GHG emissions, or may not be able to demonstrate to the ARB's satisfaction that it has done so. The Sustainable Santee Plan ensures that the City is in compliance with AB 32 and EO S-3-05. Thus, continuation of the existing General Plan without implementation of the Sustainable Santee Plan would not result in the same beneficial effects of plan compliance, although it would result in a similar less than significant impact with respect to consistency with other identified land use plans.

Wildfire. This area was added to the CEQA Guidelines in December 2018 after the publication of the NOP/IS for the Sustainable Santee Plan. This area of review was added to the PEIR and is discussed in Section 4.7 of this PEIR. The ~~impacts of the~~ project ~~could be reasonably expected to generate~~ includes the planting of additional trees to reduce the urban heat island effect on the developed portions of Santee where the majority of the land surface is covered with buildings or paving. Trees planted to reduce the urban heat island effect, mostly would be located in the center or developed areas of the City and not within the Very High Fire Hazard Severity Zones located at the periphery of the city. In addition such trees would be native and drought resistant thereby less susceptible to fire. Therefore, the project would have a less than significant impact on wildfire.

5.4.1.2 Attainment of Project Objectives

Without adoption and implementation of the Sustainable Santee Plan, there would be no plan that lays out measures and actions for achieving sustainability by utilizing resources effectively and reducing GHG emissions, or strategies for preparing for potential climate-related impacts. Additionally, there would be no plan laying out implementation steps to support achievement of the energy efficiency and GHG reduction goals. There would also be no policy document to be referred to during the planning process for future development projects. The list of specific actions to reduce GHG emissions would not be available. Furthermore, there would be no plan from which future developments could streamline CEQA compliance. Lack of a plan to meet the State's GHG gas reduction goals may make Santee less economically competitive as business owners and residents increasingly prefer locations and homes that require less electricity and energy uses (and as a result, are less expensive to supply with electricity and energy) and that have less impact on the environment. Therefore, this alternative would not meet any of the objectives of the proposed project.

5.4.2 Alternative 2: Accelerated Reduction Program Alternative

5.4.2.1 Description of Alternative

Alternative 2 would include more aggressive GHG Reduction goals that match the State's 2050 goal to be implemented by 2030. The 2050 goal as described in Executive Order S-3-05 is to get statewide emissions 80 percent below 1990 levels by 2050. In addition to these GHG emission reductions, Executive Order B-55-18 has established a new statewide goal of carbon neutrality as soon as possible and no later than 2045. Carbon neutrality refers to achieving net zero carbon emissions by balancing a measured amount of carbon emissions with an equal amount that is sequestered or offset. These are two separate but related targets.

Statewide emissions include intra-state aviation, water-borne transportation, and some unique industrial processes that will require continued GHG emissions. To achieve Carbon Neutrality and to achieve a reduction of GHG emission to 80% below 1990 levels, other State-wide carbon emission sectors would have to achieve zero carbon emissions and buy carbon sequestration credits.

To implement the goals of Carbon Neutrality and a 80% reduction in GHG emissions at the City level actions would include 1) adoption of zero net energy standards for all new construction earlier than planned; 2) retrofitting many existing building with energy savings measures; 3) be a member of a Community Choice Aggregation program, Investor Owned Utility or other energy provider that achieves 100% renewable energy.

Alternative 2 would require the GHG reductions in a shorter time frame. This Alternative would not benefit from technological and regulatory changes that would over a longer time frame. Therefore, the required reductions would involve more local effort. For example everyone living in, working in, and visiting the City could have to own and travel in an electric vehicle or find alternative transportation such as walking or biking. This could also apply to the bus system and heavy-duty trucks that transport goods to and from the City. Since on-road transportation accounts for 60% of all GHG emissions in the City, combustion engines would be banned (e.g., portable generators, lawn mowers, scooters, motorcycles, cars, and trucks) within the City unless carbon credits could offset these emissions.

Alternative 2 would also require that wastewater treatment be contained in covered tertiary treatment with methane capture systems. Methane is a GHG. To achieve GHG or Carbon Neutrality, the water treatment plant would have to be covered to capture these gases or credits purchased to mitigate such emissions. Additionally, all electricity would need to be generated by solar photo-voltaic ("PV") or other zero-emission renewable sources. This would require advanced energy storage systems to provide electricity 24 hours, seven days a week regardless of renewable generation, at any given time. Some of this advanced energy storage capacity is just coming online and may not be economically feasible to be placed near every PV system by 2030.

Alternative 2 would require the GHG reductions in a shorter time frame. This Alternative would not benefit from technological and regulatory changes that would over a longer time frame. Therefore, the required reductions would involve more local effort. Alternative 2 could require all existing buildings and industrial land uses retrofitted to become zero-emission land uses, requiring PV solar retrofits, energy efficiency retrofits, and replacement of all appliances (e.g., no gas appliances). The

City has the opportunity to implement this requirement 1) at point of sale during real estate transactions or 2) when a property owner applies for building or discretionary permit from the City . Alternatives, to this process would be to purchase carbon offset credits. In order to meet the reduction goals all existing land uses would need to change owners, apply for a building or discretionary permit from the City or existing owners would need to voluntarily retrofit their properties so that 100 percent of buildings (businesses and residential land uses) are retrofitted by 2030. It would be unlikely that all of Santee's approximately 19,000 parcels would fall into one of these scenarios by the year 2030.

Aesthetics. Implementation of Alternative 2 would involve incorporation of renewable energy-generating systems in new construction to meet the aggressive zero city emissions by 2030. These systems include solar panels, photovoltaic arrays, and energy-saving components such as cool roofs, similar to the proposed project, as well as larger renewable energy projects. As with the proposed project, future development under Alternative 2 would be required to comply with the Santee municipal development review criteria and procedures to determine the development projects' consistency with the Zoning Code, Municipal Code, and General Plan. However, implementation of Alternative 2 would likely result in more energy-generating systems on rooftops, as well as larger renewable energy projects that would likely affect the visual character of the surrounding community. Thus, the impact from future development under Alternative 2 would be significant. Similar to the proposed project, implementation of Alternative 2 could require mitigation measures to reduce the impacts of glare of smaller renewable energy-generating systems. Unlike the proposed project, this impact would be potentially significant and unavoidable under Alternative 2.

Air Quality. Alternative 2 is intended to implement the State's 2050 goal by 2030. The 2050 goal, as described in Executive Order S-3-05, is to reduce statewide emissions to 80 percent below 1990 levels by 2050. As described above, because statewide emissions include intra-state aviation and some unique industrial processes that will require continued emissions, implementing this goal at a citywide level will require zero emissions from all sectors. Alternative 2 would reduce GHG emissions below the emissions reduction goals of AB 32 and SB 32. Specific measures would be implemented to supplement the policies in the General Plan and would facilitate achievement of zero citywide emissions. Similar to the proposed project, implementation of Alternative 2 would reduce regional criteria air pollutants emissions and is not expected to result in any long-term regional air quality impacts. Therefore, similar to the proposed project, Alternative 2 would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant.

Biological Resources. While development under Alternative 2 would likely result in the construction of more structures compared to the proposed project, it would not result in conflicts with provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP (once the Subarea Plan is adopted). While Alternative 2 would result in development of more and larger renewable energy projects than the proposed project, all projects would still be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts. Thus, the impact from future development conflicting with habitat conservation plans would be less than significant, similar to the proposed project.

Greenhouse Gas Emissions. Alternative 2 is intended to implement the State's 2050 goal by 2030. The 2050 goal as described in Executive Order S-3-05 is to have statewide emissions 80 percent

below 1990 levels by 2050. As described above, because statewide emissions include intra-state aviation and some unique industrial processes that will require continued emissions, implementing this goal at a citywide level will require zero emissions from all sectors. Alternative 2 would reduce GHG emissions below the emissions reductions goal of AB 32 and the ARB's Climate Change Scoping Plan. Specific measures would be implemented to supplement the policies in the General Plan and would facilitate achievement of zero citywide emissions. Therefore, similar to the proposed project, implementation of the Alternative 2 would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

Hazards and Hazardous Materials. Development under Alternative 2 would likely result in the construction of more structures in the ALUCP area of both Gillespie Field and MCAS Miramar Airports compared to the proposed project. Additionally, as described under Aesthetics, glare could also result from implementation of Alternative 2, which could affect aircraft safety. While Alternative 2 would result in development of more and larger renewable energy projects than the proposed project, all proposed development projects would still require review by the San Diego County Regional Airport Authority to ensure continuing aircraft safety. Implementation of Alternative 2 could also require mitigation measures to reduce the impacts of glare to less than significant.

Land Use and Planning. As described above, under Air Quality, similar to the proposed project, implementation of Alternative 2 would reduce regional criteria air pollutant emissions and is not expected to result in any long-term regional air quality impacts. Therefore, similar to the proposed project, Alternative 2 would not conflict with or obstruct implementation of the applicable air quality plan. Additionally, any future development projects that would occur under Alternative 2 would be subject to all applicable City regulations and requirements, including specific plans, as well as HCPs and ALUCPs, and additional CEQA analysis of project-specific impacts. Therefore, implementation of Alternative 2 would not result in any conflict with an applicable habitat conservation plan or regulation of an agency with jurisdiction over the project. Additionally, the alternative's aggressive emissions reductions would be in compliance with State regulations (AB 32 and SB 32) and the California Governor's directive (EO S-3-05). Thus, Alternative 2 would result in a similar less than significant impact with respect to consistency with other identified land use plans.

Wildfire. This area was added to the CEQA Guidelines in December 2018 after the publication of the NOP/IS for the Sustainable Santee Plan. This area of review was added to the PEIR and is discussed in Section 4.7 of this PEIR. The impacts of the project could be reasonably expected to generate the planting of additional trees to reduce the urban heat island effect on the developed portions of Santee where the majority of the land surface is covered with buildings or paving. Trees planted to reduce the urban heat island effect, mostly would be located in the center or developed areas of the City and not within the Very High Fire Hazard Severity Zones located at the periphery of the city. In addition such trees would be native and drought resistant thereby less susceptible to fire. Therefore, the project would have a less than significant impact on wildfire.

5.4.2.2 Attainment of Project Objectives

While Alternative 2 would reduce GHG emissions at a quicker pace, it would not meet two objectives of the project. Objective #2 seeks to identify how the City will effectively implement the Sustainable Santee Plan by obtaining funding for program implementation and tracking and monitoring the progress of Plan implementation over time. The Alternative to accelerate GHG reductions might outpace funding sources such as grants which are designed and timed to achieve State mandates. Many State grant programs are tied to specific and timed achievement of State objectives. If Santee is ahead of this schedule, certain measures would not be eligible for available grants and would require the use of general Funds. This would put strain on the City's ability to fund such a program.

Alternative 2 requires that an energy provider achieve 100% renewable energy by 2030. Current renewable energy rates for the existing CCAs are averaging around 70%. It might be infeasible of achieving 100% renewable energy sourcing by 2030 as the growing number of CCAs may outstrip clean energy production. In addition, many long term contracts with non-renewable sources may remain in place for extended periods of time.

Alternative 2 would also require GHG emission reductions at an accelerated pace than surrounding jurisdictions. Depending on the GHG reduction strategy, additional costs to the City and/or homeowner or business owner could be expected. In the short term, the costs of these GHG reduction strategies could place the City, homeowner, or business owner at an economic disadvantage when compared to surrounding jurisdictions. Homeowners and businesses which are cost-sensitive may choose other cities when deciding where to locate due to the cost of implementing GHG reduction measures. In addition certain measures (1.1~~3~~ and 3.1) ~~may~~ are only ~~be~~ triggered when properties ~~are sold~~ are required to obtain building permits for modifications and it would be difficult to review all of the older residences by the year 2030. And lastly, Alternative 2 would result in significant and unavoidable aesthetic impacts due to larger renewable energy projects and other measures required to meet the more aggressive time line.

Alternative 2's target year of 2030 does not provide sufficient time for these improvements to occur. Therefore, Alternative 2 would not meet the objectives of the proposed project.

Table 5.A: Comparison of the Environmental Impacts of the Proposed Project to the Project Alternatives

Environmental Topic	Level of Impacts After Mitigation		
	Proposed Project	Alternative 1: No Project/No Development Alternative	Alternative 2: Accelerated Reduction Program Alternative
Aesthetics	Less than Significant	Less than Significant	Potentially Significant
Air Quality	Less than Significant	Less than Significant	Less than Significant
Biology	Less than Significant	Less than Significant	Less than Significant
Greenhouse Gas Emissions	Less than Significant	Potentially Significant	Less than Significant
Hazards and Hazardous Materials	Less than Significant	Less than Significant	Less than Significant
Land Use and Planning	Less than Significant	Less than Significant	Less than Significant

Table 5.A: Comparison of the Environmental Impacts of the Proposed Project to the Project Alternatives

Environmental Topic	Level of Impacts After Mitigation		
	Proposed Project	Alternative 1: No Project/No Development Alternative	Alternative 2: Accelerated Reduction Program Alternative
Attainment of All Project Objectives	Meets all of the Project Objectives	Meets None of the Project Objectives	Meets two of the four Project Objectives

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project/No Plan Alternative and Alternative 2 would not be environmentally superior to the proposed project on the basis of the minimization or avoidance of physical environmental impacts. With respect to GHG emissions, the No Project/No Plan Alternative would have potentially greater and possibly significant impacts. With respect to Aesthetics, the Accelerated Reduction Program Alternative would have potentially significant impacts. Therefore, according to the above analysis and as summarized in Table 5.A, the proposed project would be the preferred, Environmentally Superior Alternative.

6.0 LONG-TERM IMPLICATIONS OF THE PROJECT

6.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2 (c) of the *State CEQA Guidelines* requires that an EIR consider and discuss significant irreversible changes that would be caused by implementation of the proposed *Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reduction* ("Sustainable Santee Plan" or "proposed project"). The *State CEQA Guidelines* specify that the use of nonrenewable resources during the initial and continued phases of a project should be discussed because a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary and secondary impacts (such as a highway improvement that provides access to a previously inaccessible area) should also be discussed because such changes generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with the project and should be discussed.

The proposed project does not propose new development; the Sustainability Plan facilitates construction of energy-generating facilities and energy retrofits on existing structures that would entail a small commitment of energy, human resources, and building materials. This commitment of energy, personnel, and building materials would be commensurate with that of other projects of similar magnitude, and none of these commodities is in short supply.

Maintenance of new energy-generating facilities would entail a further commitment of energy resources in the form of natural gas, electricity, and water resources. However, this commitment would be minimal, consisting of routine maintenance of solar panels. The Sustainability Plan does not propose any development that would otherwise entail commitment of energy resources. In fact, the proposed project would result in a long-term reduction in energy demand and reduction of greenhouse gas emissions and other air pollutants, a beneficial impact.

6.2 GROWTH-INDUCING IMPACTS

Sections 15126(d) and 15126.2(d) of the *State CEQA Guidelines* require that an EIR analyze growth-inducing impacts and state that an EIR should discuss the ways in which a proposed project could foster economic or population growth or construction of additional housing, either directly or indirectly, in the surrounding environment. This section examines ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. An assessment of other projects that could affect the environment, individually or cumulatively, is also required. To address this issue, potential growth-inducing effects were examined through analysis of the following questions:

- Would the project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?
- Would the project result in the need to expand one or more public services to maintain desired levels of service?

- Would the project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of the project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

It should be noted that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment (*State CEQA Guidelines*, Section 15126.2[d]). This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment beyond the direct consequences of developing the proposed project as described in earlier sections of this EIR.

6.2.1 Removal of Obstacles to Growth

Climate Action Plans are not, by their nature, growth inducing. The Sustainability Plan provides a framework for reducing greenhouse gas emissions from existing and future development that has previously been planned for in the City's General Plan.

The Sustainability Plan does not propose development; therefore, it would not induce growth. The Sustainability Plan's goals promote non-motorized transportation options so as to decrease dependency on the automobile, encourage alternative transportation modes, reduce energy consumption, and promote sustainability. Additionally, the Sustainability Plan ~~promotes~~ requires retrofits to existing development and installation of new energy-generating structures; it does not include the construction of new infrastructure that would promote growth in inappropriate locations. Thus, the necessary infrastructure that normally triggers growth when introduced is already in place within the City with respect to the proposed project.

A project's growth-inducing potential does not automatically result in growth, whether it is a portion of growth or actually exceeds projected levels of growth. Growth at the local level is fundamentally controlled by the land use policies of local municipalities or counties, which are determined by the local politics in each jurisdiction.

6.2.2 Expansion of Public Services

Retrofits to existing development or construction of new energy-generating structures could require expansion of and/or upgrades to sewer, water, electrical, and gas lines in the City. However, these projects would be required to analyze needed facility extensions on a project level.

6.2.3 Encouragement/Facilitation of Economic Effects

Overall, implementation of the Sustainability Plan would provide a small number of temporary construction jobs to retrofit existing development, construct new energy-generating structures, and expand non-motorized transportation infrastructure. However, this employment would be considered on a project-by-project basis.

6.2.4 Precedent-Setting Action

Approval of the proposed project would not set a precedent that could encourage and facilitate other activities that could significantly affect the environment. In fact, the proposed project would result in a long-term reduction in energy demand and reduction of greenhouse gas emissions and other air pollutants, a beneficial impact.

6.3 SIGNIFICANT EFFECTS THAT CANNOT BE AVOIDED

As determined previously in this EIR, implementation of the proposed project would not result in significant and unavoidable adverse impacts. With implementation of mitigation measures for aesthetics and hazards and hazardous materials, the potential impacts identified in this EIR would be reduced to less than significant.

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7.0 MITIGATION MONITORING AND REPORTING PROGRAM

7.1 MITIGATION MONITORING REQUIREMENTS

Public Resources Code (PRC) Section 21081.6 (enacted by the passage of Assembly Bill 3180) mandates that the following requirements shall apply to all reporting or mitigation monitoring programs:

- The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes that have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.
- The lead agency shall specify the location and custodian of the documents or other materials that constitute the record of proceedings upon which its decision is based.
- A public agency shall provide measures to mitigate or avoid significant effects on the environment that are fully enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents that address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.
- Prior to the close of the public review period for a Draft Environmental Impact Report (EIR), a responsible agency, or a public agency having jurisdiction over natural resources affected by the project, shall either (1) submit to the lead agency complete and detailed performance objectives for mitigation measures that would address the significant effects on the environment identified by the responsible agency or agency having jurisdiction over natural resources affected by the project, or (2) refer the lead agency to appropriate, readily available guidelines or reference documents. Any mitigation measures submitted to a lead agency by a responsible agency or an agency having jurisdiction over natural resources affected by the project shall be limited to measures that mitigate impacts to resources that are subject to the statutory authority of, and definitions applicable to, that agency. Compliance or noncompliance with that requirement by a responsible agency or agency having jurisdiction over natural resources affected by a project shall not limit the authority of the responsible agency or agency having jurisdiction over natural resources affected by a project, or the authority of the lead agency, to approve, condition, or deny projects as provided by this division or any other provision of law.

7.2 MITIGATION MONITORING PROCEDURES

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in compliance with PRC Section 21081.6. It describes the requirements and procedures to be followed by the City to

ensure that all mitigation measures adopted as part of the proposed Sustainable Santee Plan will be carried out as described in this Draft EIR.

Table 7.A lists each of the mitigation measures specified in this Draft EIR and identifies the party or parties responsible for implementation and monitoring of each measure.

Table 7.A: Mitigation and Monitoring Reporting Program

Mitigation Measures		Responsible Party/ Approving Agency	Timing for Mitigation Measure
4.1: Aesthetics			
MM 4.1-1	All proposed energy-generating structures shall be constructed utilizing non-reflective materials to the maximum extent feasible. If a reflective material is used, appropriate shielding shall be placed or the structure relocated to reduce the amount of visible glare. The City shall review all discretionary projects prior to issuance of building permits to ensure that appropriate shielding and placement of such structures are included in design plans.	City of Santee Building Department	Prior to issuance of any building permits
4.2: Air Quality			
The proposed project would not result in any significant adverse impacts related to air quality. No mitigation is required.			
4.3: Biological Resources			
The proposed project would not result in any significant adverse impacts related to biological resources. No mitigation is required.			
4.4: Greenhouse Gas			
The proposed project would not result in any significant adverse impacts related to global climate change and greenhouse gas emissions. No mitigation is required.			
4.5: Hazards and Hazardous Materials			
MM 4.1-1	All proposed energy-generating structures shall be constructed utilizing non-reflective materials to the maximum extent feasible. If a reflective material is used, appropriate shielding shall be placed or the structure relocated to reduce the amount of visible glare. The City shall review all discretionary projects prior to issuance of building permits to ensure that appropriate shielding and placement of such structures are included in design plans.	City of Santee Building Department	Prior to issuance of any building permits
MM 4.5-1	Within two years of adoption of the Sustainable Santee Plan, the City of Santee shall update the Safety Element of the General Plan and include policies that will implement the climate change adaptation strategies found in Chapter 4 of the Sustainability Plan.	City of Santee Planning Division	December 31, 2021
4.6: Land Use and Planning			
The proposed project would not result in any significant adverse impacts related to land use and planning. No mitigation is required.			

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8.0 LIST OF PREPARERS

8.1 CITY OF SANTEE

- Melanie Kush, Planner, Development Services Director
- John O'Donnell, Principal Planner
- Chris Jacobs, Principal Planner

8.2 CONSULTANT TEAM (LSA)

The following individuals were involved in the preparation of the EIR and/or technical reports in support of the EIR. The nature of their involvement is summarized below.

8.2.1 Preparation of the EIR and Air Quality Memorandum

- Lynn Calvert Hayes, AICP, Principal in Charge
- Michael Hendrix, Project Manager
- Autumn Galambos, Environmental Planner
- Sarah Halterman, Environmental Planner
- Zhe Chen, Air Quality/Climate Change Specialist
- Matt Phillips, GIS Specialist
- Steven Dong, Senior Editor

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9.1 REFERENCES

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10.0 ACRONYMS AND ABBREVIATIONS

°F	Degrees Fahrenheit
µg/m^3	Micrograms per Cubic Meter
AAQS	Ambient Air Quality Standard
AB	Assembly Bill
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
BAU	Business as Usual
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standard
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAS	Climate Adaptation Strategy
CAT	Climate Action Team
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CH_4	Methane
City	City of Santee
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
County	County of San Diego
CPUC	California Public Utilities Commission
EIR	Environmental Impact Report
EO	Executive Order
EPA	United States Environmental Protection Agency
FAA	Federal Aviation Administration

FAR	Federal Aviation Regulation
FED	Functional Equivalent Document
FEIR	Final Environmental Impact Report
GCC	Global Climate Change
GHG	Greenhouse Gas
GWP	Global Warming Potential
H_2S	Hydrogen Sulfide
HCP	Habitat Conservation Plan
HFC	Hydrofluorocarbon
HSC	Health and Safety Code
IEPR	Integrated Energy Policy Report
IPCC	United Nations Intergovernmental Panel on Climate Change
IS	Initial Study
mg/m^3	Milligrams per Cubic Meter
MMRP	Mitigation Monitoring and Reporting Program
MMT	Million Metric Tons
MND	Mitigated Negative Declaration
MPO	Metropolitan Planning Organization
MPR	Market Price Referent
MSCP	San Diego Multiple Species Conservation Program
MT	Metric Ton
MTS	San Diego Metropolitan Transit System
mW	Megawatt
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NHTSA	National Highway Traffic Safety Administration
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NOP	Notice of Preparation
NOx	Nitrogen Oxides
O_3	Ozone
OMB	White House Office of Management and Budget
OPR	State of California, Governor's Office of Planning and Research
Pb	Lead
PFC	Perfluorocarbon

PM_{10}	Particulate Matter with a Diameter of 10 Microns or Less
$PM_{2.5}$	Fine Particulate Matter with a Diameter of Less Than 2.5 Microns
ppm	Parts per Million
PRC	Public Resources Code
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
REC	Renewable Energy Credit
RES	Renewable Electricity Standard
ROC	Reactive Organic Compound
ROG	Reactive Organic Gas
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas and Electric
SF_6	Sulfur Hexafluoride
SGOA	Smart Growth Opportunity Area
SIP	State Implementation Plan
SMC	Santee Municipal Code
SO_2	Sulfur Dioxide
SR	State Route
UNFCCC	United Nations Framework Convention on Climate Change
USFWS	United States Fish and Wildlife Service
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound

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APPENDIX A: NOTICE OF PREPARATION, INITIAL STUDY

APPENDIX A-1: NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

CITY OF SANTEE

Notice of Preparation of a Draft Program Environmental Impact Report

TO: Agencies, Organizations, and Interested Parties

SUBJECT: Notice of Preparation of a Draft Program Environmental Impact Report

The City of Santee (City) will be the lead agency, in accordance with the California Environmental Quality Act (CEQA), in the preparation of a Program Environmental Impact Report (PEIR) for the implementation of the proposed Sustainable Santee Plan (Sustainability Plan). The Sustainability Plan is considered a project under CEQA, and the City has discretionary authority over the project.

Agencies: The City requests the view of your agency as to the scope and content of the environmental analysis relevant to your agency's statutory responsibilities and interests in connection with the proposed project. Your agency may need to use the EIR prepared by the City when considering any required permits issued by your agency or when authorizing other approvals related to the project.

Organizations and Interested Parties: The City requests any comments related to environmental concerns associated with this project.

Deadline: CEQA requires a 30-day scoping period. The public review period on the NOP is scheduled to begin on **August 17, 2017** and close on **September 18, 2017.** Because of the time limits mandated by State law, your response must be received by this deadline. Please indicate a contact person and send your response to the following:

John O'Donnell, Principal Planner
Development Services Department
City Hall, Building Four
10601 Magnolia Avenue
Santee, CA 92071
jodonnell@CityofSanteeCa.gov
(619) 258-4100, Ext. 182

A public scoping meeting will be held **4:00 pm - 6:00pm** on **August 31, 2017** at the City Council Chambers, located at Santee City Hall, 10601 Magnolia Avenue, Santee, CA 92071. All parties are welcome to attend and are encouraged to recommend environmental issues, mitigation measures, and alternatives to the project that they believe should be addressed in the PEIR.

Project Title: Sustainable Santee Plan (Sustainability Plan)

Project Location: The proposed project is located within the City of Santee (City), which is located within eastern San Diego County, approximately 18 miles east of downtown San Diego. The City of Santee is bordered on the west and southwest by the City of San Diego and Marine Corps Air Station Miramar; on the south by the City of El Cajon; on the north by San Diego County; and on the east by unincorporated communities of Lakeside and Eucalyptus Hills. The City is approximately 16.5 square miles and supports a population of approximately 56,000 residents. The project area includes the City of Santee. Figure 1 shows the regional location of the City of Santee.

Project Description: The proposed project is intended to provide policy direction and identify actions the City and community will take to significantly reduce the generation of greenhouse gas emissions (GHGs) consistent with California AB 32 and EO S-3-05. The purpose of the Sustainability Plan is to guide the development, enhancement, and ultimately the implementation of actions and strategies that reduce the City's GHG emissions. Overall, the goal of the Sustainability Plan is to reduce the City's community-wide GHG emissions by 15 percent below 2005 emissions by 2020 and 49 percent below 2005 emissions by 2035 in conformance with Assembly Bill 32 Scoping Plan and post-2020 reductions in conformance with the goals set in Executive Order S-3-05. In addition, the City is aiming to reduce community-wide emissions below six metric tons CO2e per capita by 2030 in conformance with Senate Bill 32 and California Air Resources Board Draft 2017 Scoping Plan. The Sustainability Plan would describe the existing regulations pertaining to climate change, calculate baseline GHG emissions produced in the City, project GHG emissions that could be expected if the Sustainability Plan is not implemented, identify reduction strategies to meet reduction targets and calculate GHG emissions reductions with implementation of reduction measures.

Preliminary Environmental Review: The City prepared an Initial Study for the project, which is a preliminary analysis used to focus the forthcoming PEIR analysis on potentially significant impacts. After conducting the preliminary review of the project and preparing the Initial Study, the City determined that the proposed project would result in potentially significant impacts to the following resources, and these resources will be analyzed in detail in the PEIR:

- Aesthetics
- Air Quality
- Biological Resources
- Mandatory Findings of Significance
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Energy Conservation
- Transportation/Traffic
- Land Use/Planning

The Initial Study determined that the proposed project would have no environmental impacts or less-than-significant environmental impacts with respect to Agricultural Resources, Cultural Resources, Geology/Soils, Hydrology/Water Quality, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Tribal Cultural Resources, and Utilities/Service Systems. As such, the analysis of these resource topics will be included in the Effects Found Not to Be Significant chapter of the PEIR.

A **copy of the Initial Study** is available for review at the following locations:

- Development Services Department, 10601 Magnolia Avenue, Building #4, Santee, CA 92071
- Santee Public Library, 9225 Carlton Hills Boulevard #17, Santee CA 92071
- The City of Santee website:

  www.cityofsanteeca.gov

  Please select the "News" Section at the bottom of the home page.

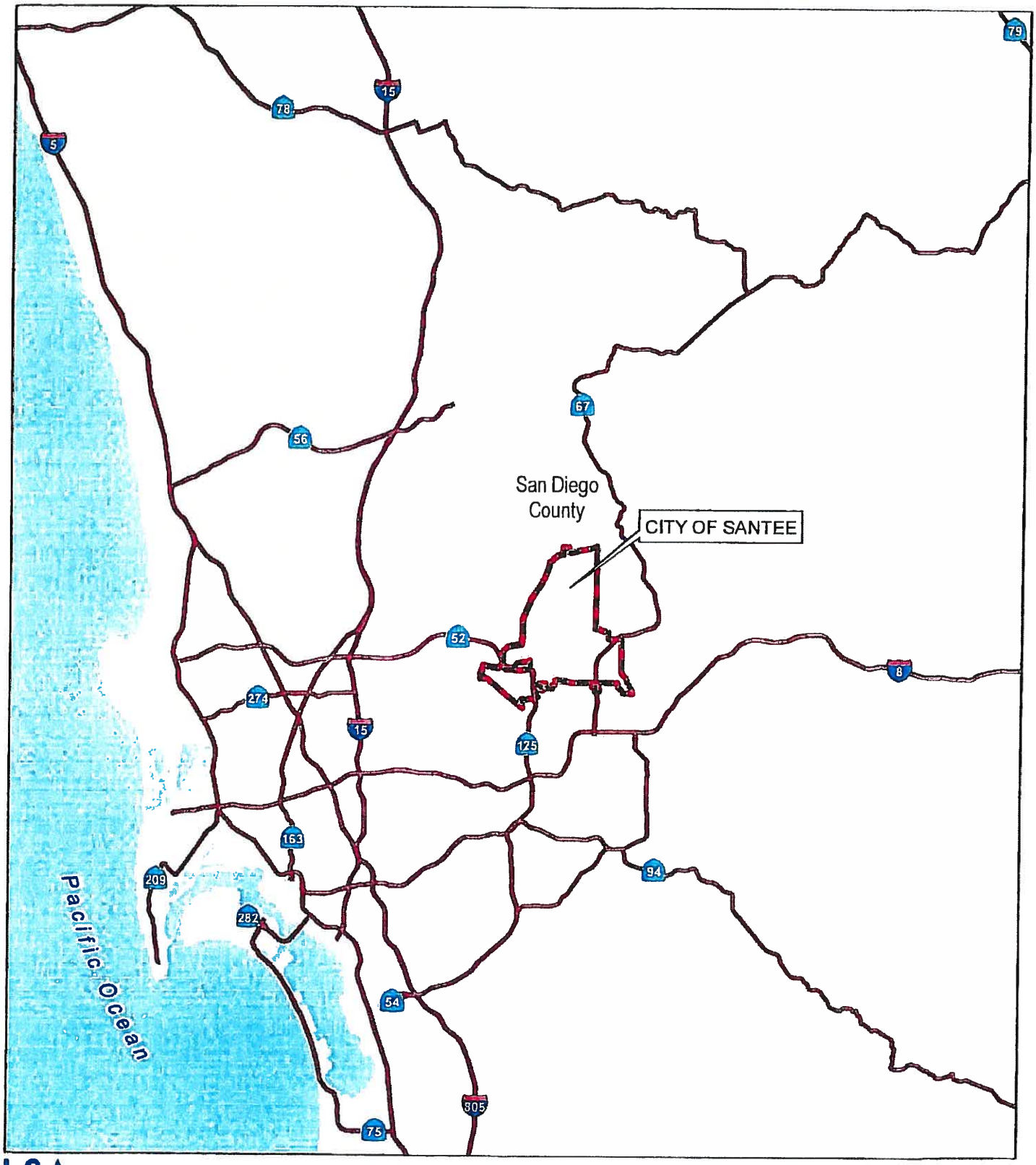
For questions regarding this Notice of Preparation, please contact John O'Donnell at (619) 258-4100, Ext. 182.

8/15/2017

John O'Donnell
Principal Planner
City of Santee

Date

Figure 1 Regional Location



LSA

LEGEND

City Boundary

Sphere of Influence

Freeways and Highways

Roads

0 2.5 5

Miles

SOURCE: Esri (2015)

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FIGURE 1

Sustainable Santee Plan

Regional Location

CITY OF SANTEE

Notice of Preparation of a Draft Program Environmental Impact Report

TO: Agencies, Organizations, and Interested Parties

SUBJECT: Notice of Preparation of a Draft Program Environmental Impact Report
Extended Review Period – Ends October 2, 2017

The City of Santee (City) will be the lead agency, in accordance with the California Environmental Quality Act (CEQA), in the preparation of a Program Environmental Impact Report (PEIR) for the implementation of the proposed Sustainable Santee Plan (Sustainability Plan). The Sustainability Plan is considered a project under CEQA, and the City has discretionary authority over the project.

Agencies: The City requests the view of your agency as to the scope and content of the environmental analysis relevant to your agency's statutory responsibilities and interests in connection with the proposed project. Your agency may need to use the EIR prepared by the City when considering any required permits issued by your agency or when authorizing other approvals related to the project.

Organizations and Interested Parties: The City requests any comments related to environmental concerns associated with this project.

Deadline: CEQA requires a 30-day scoping period. The public review period on the NOP was originally scheduled from August 17, 2017 to September 18, 2017. At the Scoping Meeting held on August 31, 2017 it was discovered that the Page 7 of the Initial Study was omitted from the version posted to the website. This omission was corrected on September 1, 2017 and therefore, the review period has been extended until **October 2, 2017.** As mandated by State law, your response must be received by this deadline. Please indicate a contact person and send your response to the following:

John O'Donnell, Principal Planner
Development Services Department
City Hall, Building Four
10601 Magnolia Avenue
Santee, CA 92071
jodonnell@CityofSanteeCa.gov
(619) 258-4100, Ext. 182

Project Title: Sustainable Santee Plan (Sustainability Plan)

Project Location: The proposed project is located within the City of Santee (City), which is located within eastern San Diego County, approximately 18 miles east of downtown San Diego. The City of Santee is bordered on the west and southwest by the City of San Diego and Marine Corps Air Station Miramar; on the south by the City of El Cajon; on the north by San Diego County; and on the east by unincorporated communities of Lakeside and Eucalyptus Hills. The City is approximately 16.5 square miles and supports a population of approximately 56,000 residents. The project area includes the City of Santee. Figure 1 shows the regional location of the City of Santee.

Project Description: The proposed project is intended to provide policy direction and identify actions the City and community will take to significantly reduce the generation of greenhouse gas emissions (GHGs) consistent with California AB 32 and EO S-3-05. The purpose of the Sustainability Plan is to guide the development, enhancement, and ultimately the implementation of actions and strategies that reduce the City's GHG emissions. Overall, the goal of the Sustainability Plan is to reduce the City's community-wide GHG emissions by 15 percent below 2005 emissions by 2020 and 49 percent below 2005 emissions by 2035 in conformance with Assembly Bill 32 Scoping Plan and post-2020 reductions in conformance with the goals set in Executive Order S-3-05. In addition, the City is aiming to reduce community-wide emissions below six metric tons CO2e per capita by 2030 in conformance with Senate Bill 32 and California Air Resources Board Draft 2017 Scoping Plan. The Sustainability Plan would describe the existing regulations pertaining to climate change, calculate baseline GHG emissions produced in the City, project GHG emissions that could be expected if the Sustainability Plan is not implemented, identify reduction strategies to meet reduction targets and calculate GHG emissions reductions with implementation of reduction measures.

Preliminary Environmental Review: The City prepared an Initial Study for the project, which is a preliminary analysis used to focus the forthcoming PEIR analysis on potentially significant impacts. After conducting the preliminary review of the project and preparing the Initial Study, the City determined that the proposed project would result in potentially significant impacts to the following resources, and these resources will be analyzed in detail in the PEIR:

- Aesthetics
- Air Quality
- Biological Resources
- Mandatory Findings of Significance
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Energy Conservation
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- Land Use/Planning

The Initial Study determined that the proposed project would have no environmental impacts or less-than-significant environmental impacts with respect to Agricultural

Resources, Cultural Resources, Geology/Soils, Hydrology/Water Quality, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Tribal Cultural Resources, and Utilities/Service Systems. As such, the analysis of these resource topics will be included in the Effects Found Not to Be Significant chapter of the PEIR.

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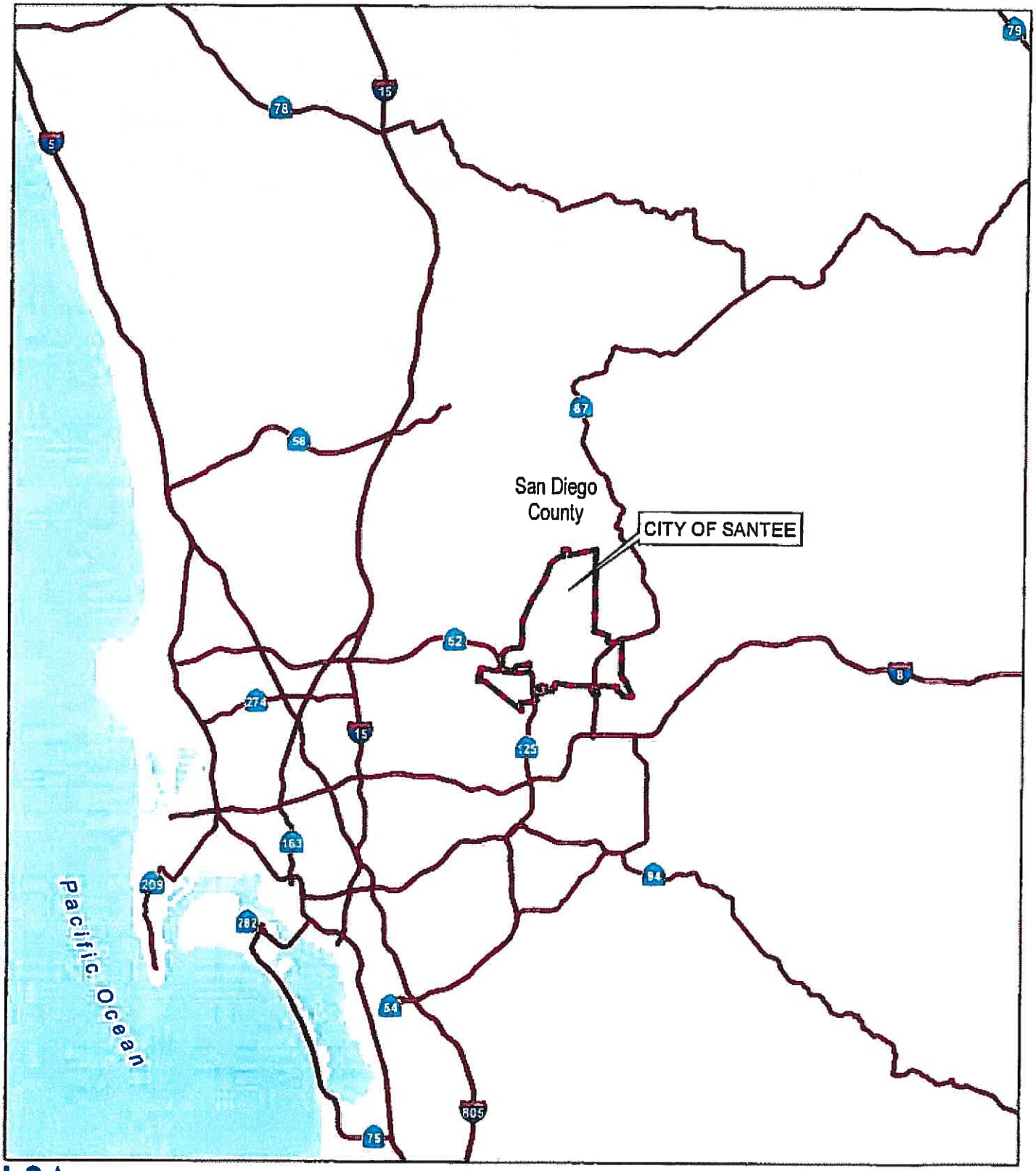
For questions regarding this Notice of Preparation, please contact John O'Donnell at (619) 258-4100, Ext. 182.

John O'Donnell
Principal Planner
City of Santee

9/11/2017
Date

Figure 1 Regional Location



LSA

FIGURE 1

LEGEND

- City Boundary
- Sphere of Influence
- Freeways and Highways
- Roads

0 2.5 5
Miles

SOURCE: Esri (2015)

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Sustainable Santee Plan

Regional Location

APPENDIX A-2: INITIAL STUDY

INITIAL STUDY

SUSTAINABLE SANTEE PLAN

CITY OF SANTEE

SAN DIEGO COUNTY, CALIFORNIA

Prepared for:

City of Santee
10601 Magnolia Avenue
Santee, California 92071

Prepared by:

LSA
703 Palomar Airport Road, Suite 260
Carlsbad, California 92011

Project No. SNT1701

LSA

August 2017

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FIGURE

1.0 INTRODUCTION

1.1 PURPOSE AND CEQA PROCESS

This Initial Study (IS) has been prepared to identify potential environmental impacts in the City of Santee, California (City), from implementation of the proposed Sustainable Santee Plan (Sustainability Plan). The Sustainability Plan is considered a project under the California Environmental Quality Act (CEQA), and the City has discretionary authority over the project. Prior to preparation of this IS, the City determined that a program-level Environmental Impact Report (PEIR) will be prepared for the proposed project. This determination is based on the citywide scope of the project and the horizon year (2035) requiring an extended implementation monitoring period of the Sustainability Plan. Pursuant to *CEQA Guidelines* Section 15367, the City is the Lead Agency in the preparation of this IS and the PEIR for the Sustainability Plan.

This IS has been prepared in conformance with *CEQA Guidelines* Section 15063. The purpose of the IS is to determine the potential significant impacts associated with the implementation of the Sustainability Plan and focus the forthcoming PEIR on potentially significant environmental effects of the Sustainability Plan. In addition, this document is intended to provide the basis for input from public agencies, organizations, and interested members of the public in scoping the forthcoming PEIR and follows the criteria for early public consultation provided in *CEQA Guidelines* Section 15083.

The remainder of this section provides a brief description of approvals required for implementation of the Sustainability Plan and includes details on how to provide input or comment on this IS. Section 2 of this document provides an overview of the Sustainability Plan and Section 3 includes the environmental checklist and evaluation of potential environmental impacts that may reasonably or foreseeably result from implementation of the Sustainability Plan.

1.2 APPROVALS REQUIRED

The City of Santee is designated as the Lead Agency for this project. According to Sections 15050, 15367 and 15381 of the *CEQA Guidelines*, responsible agencies are those public agencies other than the lead agency which have discretionary approval power over the project. The proposed Sustainability Plan is a program-level planning document for the City to use moving forward. As such, the Sustainability Plan does not address or contain a specific or proposed land use development plan, so no responsible agencies are identified at this time. The approval and implementation of the Sustainability Plan would not precipitate any subsequent land use development or redevelopment projects. Specific development projects within the City's jurisdiction would be subject to discretionary approval by the City and, depending on the development proposal, other public agencies. Approval of the Sustainability Plan would require a resolution by the City Council to certify the Final PEIR and adopt the Sustainability Plan.

1.3 INTENDED USES OF THIS DOCUMENT

In accordance with CEQA Guidelines Section 15063, this IS shall be used to: a) focus the PEIR on the effects determined to be significant, and b) identify the effects determined not to be significant and substantiate this conclusion. Effects analyzed under CEQA must be related to a physical change. CEQA Guidelines Section 15358 defines an effect or impact as:

1. Direct or primary effects which are caused by the project and occur at the same time and place.
2. Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems

Interested agencies, organizations and persons shall use the project information and the potential environmental effects analysis in this IS as the basis for comments on the scope of the PEIR.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The City of Santee is a suburb of San Diego in San Diego County, California, as shown in Figure 1.

2.2 PROJECT BACKGROUND

The State of California has adopted a wide variety of regulations aimed at reducing its greenhouse gas (GHG) emissions. While State actions alone cannot stop global warming, the adoption and implementation of legislation demonstrates California's leadership in addressing this critical challenge. State laws, regulations, Executive Orders (EO), and adopted GHG reduction plans have set the framework for cities and counties to prepare and implement their own community and municipal plans for the purposes of reducing GHGs. Specifically, EO S-3-05 and EO B-30-15 have provided GHG emission reduction goals for the State. Assembly Bill 32 (AB 32) and Senate Bill 32 (SB 32) further emplace requirements for reducing GHGs in California. A brief overview of relevant State actions is provided below.

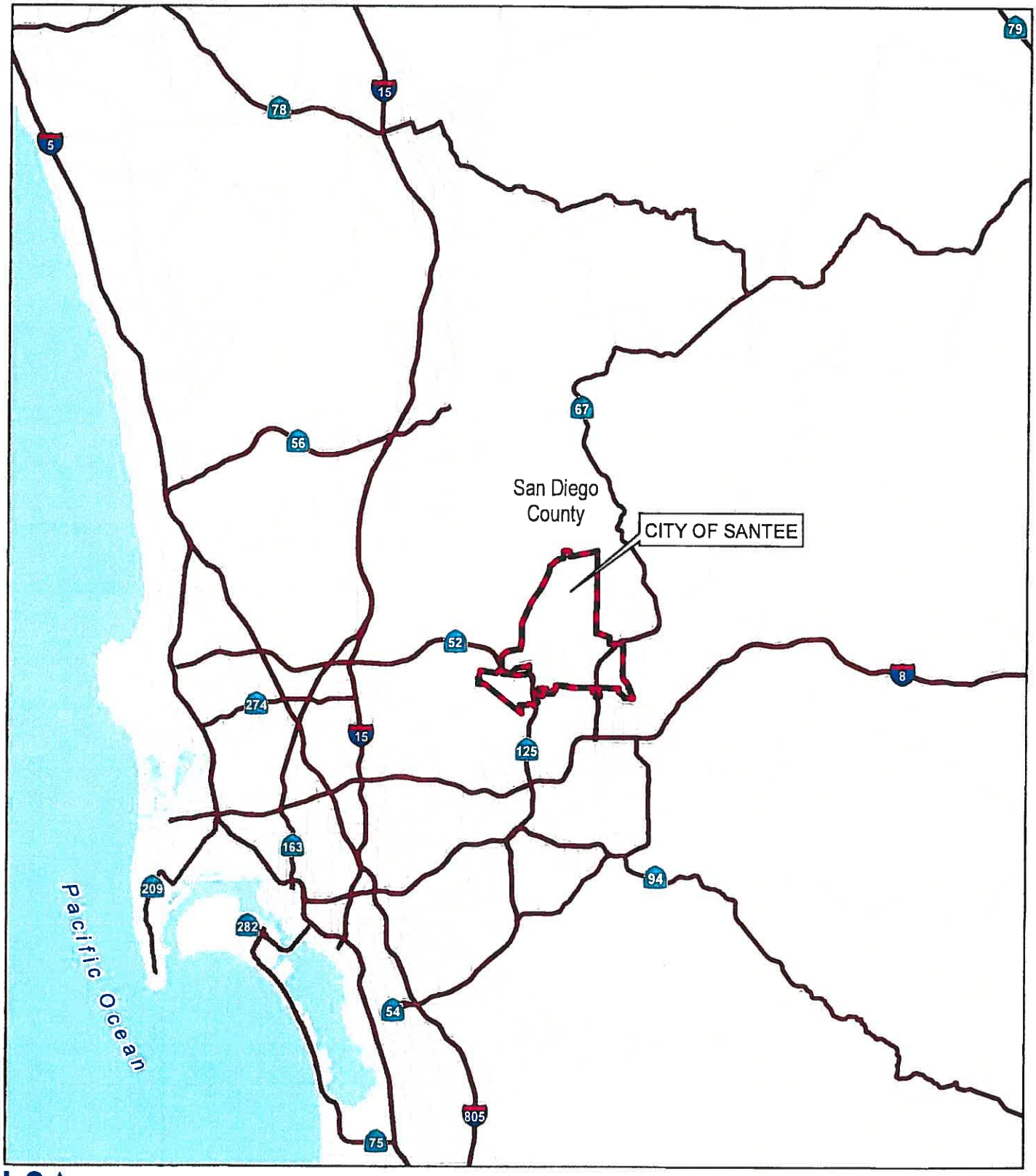
The Draft Sustainability Plan would articulate the City's intentions with respect to reducing communitywide GHG emissions in a manner consistent with AB 32 and SB 32. In addition, the Sustainability Plan is designed to address multiple sectors and resources for increased sustainability within the City. Throughout the Sustainability Plan, the City outlines strategies, objectives, measures, and actions to create an interconnected transportation system and land use pattern; minimize energy consumption; promote water conservation; and conserve, create, and enhance natural assets that improve the community's quality of life.

Executive Order S-3-05

On June 1, 2005, California Governor Arnold Schwarzenegger announced EO S-3-05, which contains the following GHG emissions targets:

- By 2010, California shall reduce GHG emissions to 2000 levels.
- By 2020, California shall reduce GHG emissions to 1990 levels.
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

Executive Order S-3-05 complements the international efforts in reducing GHG emissions. The Kyoto Protocol, the first International effort to mitigate GHG emissions, set goals in a stair step format toward the 2050 goal and EO S-3-05 matches exactly with the Kyoto Protocol goals. The reason that international agreements and State goals do not simply go directly to the 2050 goal is because technology and the engineering capabilities related to GHG reductions still need to be developed in order to meet that goal. This idea of significant progress in post-2020 allows science, engineering, and society to develop to the point that the 2050 goal can be a reality.



LSA

LEGEND

City Boundary

Sphere of Influence

Freeways and Highways

Roads

0 2.5 5

Miles

SOURCE: Esri (2015)

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FIGURE 1

Sustainable Santee Plan

Regional Location

the Sustainability Plan is to reduce the City's communitywide GHG emissions by 15 percent below 2005 emissions by 2020 in accordance with recommendations within the AB 32 Scoping Plan and following continued reductions in accordance with EO S-3-05, 49 percent below 2005 emissions by 2035. In addition, the City is aiming to reduce communitywide emissions below six metric tons CO_2e per capita by 2030 in accordance with the Proposed 2017 Scoping Plan Update to implement SB 32. The Sustainability Plan would provide general information about climate change and how GHG emissions within the City contribute to it, as well as analyze the potential effects of climate change on the City. In addition, the Sustainability Plan would describe the baseline GHG emissions produced in the City and would project GHG emissions that could be expected if the Sustainability Plan is not implemented. The strategies, measures, and actions that would be proposed in the Sustainability Plan are described in greater detail under "Greenhouse Gas Emissions Reduction Strategies," below.

This Initial Study provides programmatic-level analysis of the proposed plan. The Sustainability Plan would not include any development proposals that would directly result in physical environmental effects due to the construction and operation of facilities. Future projects subject to CEQA review would be required to demonstrate consistency with the goals and actions of the Sustainability Plan for project-level GHG impacts to be deemed less than significant. The purpose of the forthcoming Sustainability Plan would include the following:

- *Present a plan for achieving sustainability within the City by utilizing resources effectively, reducing greenhouse gas emissions (GHG), and improving the public health, safety, and welfare within the community.*
- *Provide a* summary of the City's historic and estimated future GHG emissions in order to understand the local context of GHG emissions, and determine the reduction targets appropriate for the City.
- *Provide GHG Reduction Measures* that promote economic competiveness, are appropriate within the context of the community character, and include local control over emission source.
- *Develop an implementation strategy that tracks and monitoring progress of the Plan over time to ensure that the plan meets the reduction targets.*

2.4 EMISSION INVENTORIES, BASELINE, AND PROJECTIONS

The Sustainability Plan will present an updated GHG emissions inventory, establish an emissions baseline, provide projections of emissions in 2020, 2030, and 2035, and describe the City's emissions reduction targets. The emissions inventory will identify the sources, distribution, and amount of GHG emissions by emission sector, including energy consumption, transportation, off-road sources, water, wastewater, and solid waste.

The City prepared community inventories for the years 2005, 2008, 2012, and 2013 and municipal inventories for the years 2005 and 2013. The 2005 inventory (for both community and municipal operations) is considered the baseline year. The community inventory includes the GHG emissions that result from activities within the community the City serves. The municipal GHG emissions inventory is largely a subset of the community inventory. The municipal inventory includes emissions from activities conducted as part of government operations in the City.

In 2005, the City's total communitywide emissions were 243,505 MT CO_2e. The on-road transportation sector accounted for the greatest percentage of emissions (35 percent), followed by the residential energy sector (26 percent), commercial energy sector (15 percent), off-road sources (12 percent), solid waste (7 percent), and water (5 percent). Emissions from wastewater accounted for less than 1 percent of total communitywide emissions.

The City's municipal emissions were 1,657 MT CO_2e in the baseline year (2005), which is approximately 1 percent of the total community emissions. The City's streetlights (SDG&E-owned) accounted for the greatest percentage of emissions (26 percent), followed by fleet & equipment (22 percent), buildings & facilities (17 percent), solid waste (13 percent), employee commute (13 percent), City-owned outdoor lighting (9 percent), and water pumping (1 percent).

The City established State-aligned reduction targets of 15 percent below 2005 emissions by 2020 and 49 percent below 2005 emissions by 2035. In addition, the City is aiming to reduce community-wide emissions below six metric tons CO_2e per capita by 2030. To determine the emission reductions needed to achieve the City's goals, GHG emissions levels were projected for the years 2020, 2030, and 2035 using two scenarios: a Business-as-Usual (BAU) and an Adjusted BAU scenario. The BAU scenario describes emissions based on projected growth in population and employment and does not consider State policies or regulations that will reduce emissions in the future (that is, California's policies and related efficiency levels in place in 2005 are assumed to remain constant through 2035). The Adjusted BAU scenario describes emissions based on projected growth and considers State policies and regulations adopted or emplaced after 2005 that will achieve GHG reductions in the future.

Community Emissions Forecasts and Targets

The City's community BAU emissions in 2020 are estimated to be 251,897 MT CO_2e, or a 3.4 percent increase from baseline emissions. In 2030, the City's community emissions are estimated to be 281,843 MT CO_2e, or a 15.7 percent increase from baseline emissions. By 2035, emissions are estimated to increase 22.5 percent from the baseline level to 298,257 MT CO_2e. The City's communitywide Adjusted BAU emissions in 2020 are estimated to be 202,273 MT CO_2e in 2020, 207,482 MT CO_2e in 2030, and 211,460 MT CO_2e in 2035. This change represents a 16.9 percent reduction from 2005 by 2020, 14.8 percent reduction by 2030, and 13.1 percent reduction by 2035.

Based on the Adjusted BAU scenario, the City will meet the 2020 and 2030 reduction targets. However, the City would need to reduce 87,272 MT CO_2e emissions below the Adjusted BAU scenario to meet the 2035 reduction target.

Municipal Emissions Forecasts and Targets

The City expects its municipal services to increase slightly over time. By 2020, emissions are estimated to increase 18 percent from the baseline level to 1,948 MT CO_2e. By 2035, emissions are estimated to increase 23 percent from the baseline level to 2,031 MT CO_2e. The City's Municipal Adjusted BAU emissions in 2020 are estimated to be 1,611 MT CO_2e, which is 3 percent lower than the 2005 baseline level. In 2035, emissions are expected to be 1 percent higher than in 2005 (1,681 MT CO_2e).

To be aligned with the community goals,[1] the City would need to reduce its emissions by 203 MT CO_2e from the 2020 Adjusted BAU forecast. By 2035, the City will need to reduce municipal operation emissions by 836 MT CO_2e from the Adjusted BAU forecast to meet a 49 percent reduction goal below 2005 levels.

2.5 GREENHOUSE GAS EMISSIONS REDUCTION STRATEGIES

The preliminary analysis of the Sustainability Plan identifies eight community and five municipal GHG emission reduction strategies that are appropriate for the local community and include local control (either directly or indirectly) over the emission sources. By 2020, these strategies are estimated to decrease community emissions by 26,708 $MTCO_2e$ and municipal emissions by 260 $MTCO_2e$. By 2035, strategies are estimated to decrease community emissions by 102,169 $MTCO_2e$ and municipal emissions by 1,050 $MTCO_2e$.

Each proposed strategy would be made up of goals, measures, and actions. Within each goal, one or more measures would be presented indicating the City's commitment toward meeting the goal. Within each measure, one or more actions would be presented that indicate the steps the City may take in achieving the measure.

Measures that have quantifiable emissions reductions include the GHG reduction potential in 2020 and 2035. Measures that would aid in reducing GHG emissions, but which cannot be quantified, would be identified as supporting measures. In addition to reducing GHG emissions, these measures would result in local benefits, called co-benefits. Co-benefits would be identified with each measure and would range from providing improved air quality and mobility to increased awareness about sustainability.

[1] The community goal of 6 metric tons CO_2e per capita by 2030 is not applicable to municipal emissions.

3.0 ENVIRONMENTAL CHECKLIST AND IMPACT EVALUATION

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 in Section 3.5.

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

3.2 ENVIRONMENTAL FACTORS TO BE ANALYZED FURTHER

Aesthetics (Visual Character, and Light and Glare)

Installation of solar arrays could occur on the rooftops of new or existing structures with implementation of the Sustainability Plan. Depending on the visual characteristics, size, and mass of these structures, introduction of these features could have an adverse impact on the visual character or quality of these features. Additionally, large solar arrays outside of the airport influence areas may result in substantial daytime glare that would affect neighboring land uses and/or motorists. These issues will be analyzed further in the PEIR.

Air Quality (Applicable Air Quality Plan)

The purpose of the Sustainability Plan is to reduce GHG emissions within the City to help contribute to global efforts to reduce the effects of climate change. Requirements/recommendations within the Sustainability Plan include reducing on-road vehicle use, expanding bicycle infrastructure, enhancing public transit, using renewable energy, improving energy efficiency in buildings, improving energy management, increasing water conservation, and reducing the urban heat island effect. In addition to reducing GHGs, implementation of the Sustainability Plan would also help to reduce criteria air pollutants. The Sustainability Plan's consistency with applicable air quality plans will be analyzed in the PEIR.

Biological Resources (Habitat Conservation Plan)

Implementation of energy production facilities could result in conflicts with adopted plans. A more comprehensive discussion of the proposed project's consistency with adopted habitat conservation plans is required. These issues will be analyzed further in the PEIR.

Energy Conservation

Appendix F of the *State CEQA Guidelines* requires PEIRs to include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. In addition, Appendix F seeks inclusion of the following:

- Measures to reduce wasteful, inefficient, and unnecessary consumption of energy during construction, operation, and maintenance of the project;
- Measures for reducing peak energy demand;
- Incorporation of alternative fuels (particularly renewable ones) or energy systems; and
- Incorporation of recycling for nonrenewable resources.

These topics will be analyzed in the PEIR.

Greenhouse Gas Emissions (Applicable Plan, Policy, or Regulation)

The Sustainability Plan would include a baseline GHG emissions inventory, a methodology for tracking and reporting emissions in the future, and requirements/recommendations for GHG reduction strategies as a foundation for these efforts. An indicator of the success of these efforts will be a measured reduction in GHG emissions using the protocols in the Sustainability Plan. The Sustainability Plan is another tool that can be used to guide development in the City by focusing on attaining the various goals and policies of the General Plan as well as the GHG reduction goals. The proposed project's consistency with General Plan policies and statewide and regional goals will be analyzed in the PEIR.

Hazards and Hazardous Materials (Glare)

The increased use of photovoltaic/solar arrays in the vicinity of the airport influence areas of Gillespie Field and Marine Corps Air Station (MCAS) Miramar could increase light and glare, which could represent an increased safety hazard. This issue will be analyzed in further detail in the PEIR.

Land Use and Planning (Applicable Land Use Plan, Policy, or Regulation)

Policies and implementation programs in the Sustainability Plan would facilitate mixed-use development within the growth areas of the City. The PEIR will analyze consistency of the proposed project with the land use designations and policies of applicable plans.

Transportation / Traffic (Active Transportation Plans, Policies, or Programs)

Policies and implementation programs in the Sustainability Plan would encourage alternative methods of transportation such as public transit, walking, or cycling. The PEIR will analyze consistency of the proposed project with adopted plans, policies and programs encouraging alternative modes of transportation.

3.3 ENVIRONMENTAL FACTORS NOT FOUND TO BE SIGNIFICANT

The following issues require no further environmental analysis in the PEIR, as described in detail in the checklist discussions that follow.

- Agricultural Resources;

- Cultural Resources;
- Geology/Soils;
- Hydrology/Water Quality;
- Mineral Resources;
- Noise;
- Population/Housing;
- Public Services and Recreation;
- Tribal Cultural Resources; and
- Utilities and Services Systems.

3.4 DETERMINATION

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 impact" 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 the 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.

8/15/2017

John O'Donnell
Principal Planner
City of Santee

Date

3.5 CHECKLIST AND EVALUATION OF POTENTIAL ENVIRONMENTAL IMPACTS

Aesthetics

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐
d) Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☒	☐	☐	☐

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Less than Significant Impact

The Sustainability Plan would be a policy-level document that does not include any site-specific designs or proposals and does not propose to grant any entitlements for development that would have the potential to degrade the aesthetic quality of the environment or adversely affect visual resources within the City. The Sustainability Plan would propose strategies and measures that would aid in reducing the City's GHG emissions and, thus, would not directly lead to development that would affect a scenic vista. While the Sustainability Plan would be a policy document that does not recommend specific densities, building heights, massing, or design of any projects, future activities implemented under the Sustainability Plan could result in changes to community aesthetics. For example, the Sustainability Plan promotes the installation of photovoltaic (PV) panels on homes and businesses to provide alternate sources of energy. PV panels could be placed on rooftops, which could potentially alter scenic views from homes or businesses located behind the rooftop panels. However, the placement of PV panels for residential use would likely not be large enough to significantly affect views from other residences located uphill or behind the rooftop panels. Installation of these panels would require standard building permits from the City, which would ensure the PV panels would not have a specific, adverse impact on visual resources.

Furthermore, any future development projects that would implement Sustainability Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainability Plan. The City's zoning regulations, standard development conditions, and design guidelines address site and building design. Therefore, the Sustainability Plan would not result in any substantial visual impacts on the physical environment and impacts would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Less than Significant Impact

State scenic highways are those highways that are either officially designated as State Scenic Highways by the California Department of Transportation (Caltrans) or are eligible for such designation. According to the California Scenic Highway Mapping System, there are no officially designated highways within the project area. However, a segment of State Route 52, located west of Santee, was designated a state scenic highway in 2016(Caltrans 2017).

Any future development projects that would implement Sustainability Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainability Plan. Specifically, General Plan Policies 9.7 and 10.1 and Objective 12 will protect the scenic resources and historic buildings associated with State Route 52 (City of Santee 2003). Therefore, implementation of the Sustainability Plan would not result in any substantial damage to scenic resources within a State Scenic Highway. Impacts would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Impact

The Sustainability Plan promotes the renovation of existing buildings to improve energy efficiency, as well as the installation of PV systems on existing and new facilities. The installation of PV panels on rooftops could result in slight changes to existing visual character. **This topic will be analyzed in the PEIR, and mitigation will be developed and included in the PEIR, if necessary, to address potentially significant adverse project effects related to existing visual character.**

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

Potentially Significant Impact

Implementation of the Sustainability Plan would not result in the development of major light sources. Installation of cool roofs (light-reflecting surfaces) and PV panels on homes and businesses is encouraged to reduce the urban heat island effect and the City's dependence on energy sources that produce GHGs. Cool roofs are built from materials with high thermal emittance and high solar reflectance—or albedo—to help reflect sunlight (and the associated energy) away from a building. The cool roofing materials are lighter in color and more reflective than traditional roofing materials; however, their reflective properties do not produce substantial glare.

PV panels can reflect sunlight when the sun is at an angle to the PV panel in relationship to the viewer. However, the reflectance would be temporary and not occur at night. Small-scale PV installments would not result in substantial sources of daytime glare. Thus, their placement and orientation on individual properties would not result in a substantial adverse effect on daytime or nighttime views in the area.

Large solar arrays may result in noticeable glare during the day. Section 3.8, Impact (e), provides that PV projects within the airport influence areas could result in substantial glare that would affect daytime views. Additionally, large solar arrays outside of the airport influence areas may result in substantial

daytime glare that would affect neighboring land uses and/or motorists. **This topic will be analyzed in the PEIR and, if necessary, mitigation will be developed and included in the PEIR to address potentially significant adverse project light and glare effects.**

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 Department 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 compiled 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 forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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 4256), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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?

No Impact

The City does not contain soils designated by the California Department of Conservation (CDC), Division of Land Resources (DLRP), as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDC DLRP 2015). No impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

No Impact

Refer to Agriculture and Forestry Resources Impact (a) above, which discusses the Sustainability Plan's potential impact on agricultural land. The City does not contain any land that is subject to a Williamson Act contract, which is designed to retain prime agriculture and open space by providing tax incentives for property owners (CDC DLRP, 2013). Therefore, implementation of the Sustainability Plan would not conflict with a Williamson Act contract. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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 4256), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact

The City's land cover is designated as Urban and Rangeland (predominantly Shrub and Herbaceous) on the Fire and Resource Assessment Program (FRAP) State of California Land Cover Map (California Department of Forestry and Fire Protection [Cal Fire] 2006), which identifies forest land coverage in California. This designation does not constitute forest land or timberland. There is no land with existing zoning of forest land or timberland within the City. Therefore, the implementation of the Sustainability Plan would not conflict with existing zoning, or cause rezoning of forest land or timberland. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

No Impact

As discussed in Agriculture and Forestry Resources Impact (c) above, there are no areas designated as forest land in the City. Therefore, implementation of the Sustainability Plan would not result in the loss of forest land or conversion of forest land to non-forest use. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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?

No Impact

Refer to Agriculture and Forestry Resources Impacts (a) and (b), above, which discuss the Sustainability Plan's potential to affect farmland or agriculturally zoned land. As identified in these sections, the implementation of the Sustainability Plan would not result in the loss of farmland. As discussed in Agriculture and Forestry Resources Impacts (c) and (d), above, the City does not have land cover designated as forest land. Therefore, the implementation of the Sustainability Plan would not convert forest land to non-forest use. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. The San Diego Air Pollution Control District (SDAPCD) is the local agency charged with administering local, State, and Federal air quality management programs for San Diego County.

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

Would the project:

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

Potentially Significant Impact

The purpose of the Sustainability Plan is to reduce GHG emissions within the City to help contribute to global efforts to reduce the effects of climate change. Requirements and recommendations within the Sustainability Plan would include reducing on-road vehicle use, expanding bicycle infrastructure,

enhancing public transit, using renewable energy, improving energy efficiency in buildings, improving energy management, increasing water conservation, and reducing the urban heat island effect. In addition to reducing GHGs, each of these elements also would help to reduce criteria air pollutants. However, while it is expected that implementation of the Sustainability Plan would reduce air quality emissions, the emissions reduction has not been quantified, and an air quality plan consistency analysis is required. **The Sustainability Plan's consistency with applicable air quality plans will be further analyzed in the PEIR, and mitigation will be developed and included in the PEIR, if necessary, to address potentially significant adverse impacts related to implementation of the applicable air quality plan.**

b) Violate any air quality standards or contribute substantially to an existing or projected air quality violation?

Less than Significant Impact

Implementation of the Sustainability Plan would not add any new vehicle trips or otherwise increase vehicle miles traveled (VMT). Implementation of the Sustainability Plan would decrease VMT and the associated vehicle emissions, thereby improving air quality. The Sustainability Plan implementation would reduce reliance on traditional, more-polluting forms of energy by increasing use of cleaner, alternative energy sources. The change in energy sources would reduce emissions associated with energy production. The Sustainability Plan would promote the renovation of existing structures with energy-efficiency retrofits and renewable energy. The anticipated construction activities required for retrofits and renovations would not involve large internal-combustion equipment that would contribute substantial air emissions. Therefore, the impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less than Significant Impact

Implementation of the Sustainability Plan would not add any vehicle trips. It is anticipated that implementation of the Sustainability Plan would decrease VMT and vehicle emissions, thus improving air quality. The Sustainability Plan implementation would reduce reliance on traditional, more-polluting forms of energy by increasing use of cleaner, alternative energy sources. The change in energy sources would reduce emissions associated with energy production. The Sustainability Plan would promote the renovation of existing structures with energy-efficiency retrofits and renewable energy. The anticipated construction activities required for retrofits and renovations would not involve large internal-combustion equipment that would contribute substantial air emissions or contribute to a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment. Therefore, the impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

d) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact

Implementation of the Sustainability Plan would not add any new vehicle trips or otherwise increase VMT. Implementation of the Sustainability Plan would decrease VMT and the associated vehicle emissions, thereby improving air quality. The Sustainability Plan implementation would reduce reliance on traditional, more-polluting forms of energy by increasing use of cleaner, alternative energy sources. The change in energy sources would reduce emissions associated with energy production. The Sustainability Plan would promote the renovation of existing structures with energy-efficiency retrofits and renewable energy. The anticipated construction activities required for retrofits and renovations would not involve large internal-combustion equipment that would contribute substantial air emissions that could affect sensitive receptors. The impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

e) Create objectionable odors affecting a substantial number of people?

No Impact

The Sustainability Plan would not propose strategies or measures that would directly or indirectly result in the creation of objectionable odors. Sustainability Plan strategies would include construction and installation of renewable energy structures (i.e., solar panels) and expansion of bicycle infrastructure; however, construction activities associated with those measures would not create objectionable odors. Therefore, no impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Biological Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐

Biological Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☒	☐	☐	☐

According to the City's General Plan, the regionally important biological resources that occur within the City include the coastal sage scrub and chaparral-covered hills in the north and south of the City and the riparian corridor along the San Diego River (City of Santee, 2003).

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 Wildlife or U.S. Fish and Wildlife Service?

Less than Significant Impact

Implementation of energy retrofits or energy production facilities could result in removal of habitat or street trees, which can provide nesting opportunities, or otherwise affect protected candidate, sensitive, or special-status species. Chapter 12.24 of the City's Municipal Code promotes urban forestry and protects trees on public property (City of Santee 2016). Furthermore, an objective of the City's General Plan Conservation Element is to preserve significant biological resources. This objective lists four policies (7.1-7.4) that help achieve this goal by encouraging and requiring the preservation, conservation, and/or enhancement of biological resources in the City. All new development that would implement goals and strategies in the Sustainability Plan must be in compliance with the City's Municipal Code and General Plan policies. Therefore, the impact from implementation of the Sustainability Plan would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Less than Significant Impact

The natural waterways within the City provide unique riparian habitat for various species. Riparian/ wetland habitat is considered to be significant wildlife habitat, particularly for bird species. As such, the City's General Plan encourages the maintenance of appropriate open space uses adjacent to these

waterways. Therefore, any future development projects that would implement Sustainability Plan measures and actions near waterways and open spaces would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainability Plan. Impacts would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than Significant Impact

There are over 300 acres of wetland vegetation communities in the City, concentrated primarily along the San Diego River and Sycamore Creek (City of Santee 2003). Implementation of the General Plan's Conservation Element requires the enforcement of appropriate Federal, State, and local water quality regulations. Implementation of the Sustainability Plan would not result in development in any wetland areas. It is possible that retrofit or construction activities could occur adjacent to wetlands. However, compliance with the General Plan would ensure no net loss of wetlands. There would be no significant impact on wetlands. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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?

Less than Significant Impact

General Plan Conservation Element policies and implementation programs promote the recovery and protection of corridors linking separate habitat areas to prevent fragmentation of sensitive natural communities. In addition, all projects are subject to the Migratory Bird Treaty Act (MBTA), which prohibits taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the Department of the Interior. Therefore, any development pursuant to the Sustainability Plan would be evaluated for conformance to these policies and regulations to ensure that riparian habitat or sensitive natural communities are not adversely affected. The impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Less than Significant Impact

An objective of the City's General Plan Conservation Element is to preserve significant biological resources. This objective lists four policies (7.1 through 7.4) to help achieve this goal by encouraging and requiring the preservation, conservation, and/or enhancement of biological resources in the City. Furthermore, projects that implement strategies from the Sustainability Plan would be subject to the City's Water Efficient Landscape Ordinance, Tree Ordinance, all applicable Federal, State, and regional policies and regulations related to the protection of important biological resources. Specifically,

development would be required to comply with the Federal Endangered Species Act, MBTA, Federal Clean Water Act, California Endangered Species Act, California Fish and Wildlife Code, California Wetlands Conservation Policy, and California Department of Fish and Wildlife Lake or Streambed Alteration Program. Therefore, impacts would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Potentially Significant Impact

The San Diego Multiple Species Conservation Program (MSCP) is the Natural Community Conservation Plan (NCCP) for San Diego County (City of San Diego 1998). The MSCP allows local jurisdictions to maintain land use control and implement their respective portions of the MSCP through Subarea Plans. The City is drafting its Subarea Plan, which will act as a Habitat Conservation Plan (HCP) in combination with the MSCP. The City's MSCP Subarea Plan aims to balance development needs with habitat conservation and ultimately protects one-fourth of the City as permanent open space (City of Santee 2003). The Plan will also specify where future development and habitat preservation are expected to occur and what mitigation will be required of future development. **This topic will be analyzed in the PEIR, which will provide a comprehensive discussion of the proposed project's consistency with the adopted plans. Mitigation will be developed and included in the PEIR, if necessary, to address potentially significant adverse impacts related to provisions of an adopted Habitat Conservation Plan, Natural Community Plan, or other approved local, regional, or State habitat conservation plan.**

Cultural Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to *CEQA Guidelines* Section 15064.5?	☐	☐	☒	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5?

Less than Significant Impact

Implementation of the Sustainability Plan would include energy-efficiency retrofit activities, which could be proposed at the site of a historical resource or at the site of a resource considered to be a potential historical resource. Future energy-efficiency retrofit activities have the potential to result in impacts on individual historical resources within the City, including resources listed in or eligible for listing in the National Register of Historic Places, California Register of Historic Places, and the City's inventory of historic resources. Five historic sites have been recorded within the City, representing less than 10 percent of the total cultural resource inventory (City of Santee 2003). In addition, the City has one structure (Edgemoor Farm Dairy Barn) listed in the National Register of Historical Places and one registered Local Historic Landmark (James Love House). General Plan Conservation Element Policies 8.1 and 8.2 incorporate specific measures to identify, register, protect, and preserve historic and archaeological resources into the City planning and environmental review processes. As such, these policies ensure that energy efficiency retrofits to historic buildings would be done without degrading the features of the building that make it a historic resource. Therefore, potential impacts to historic resources as a result of implementation of the Sustainability Plan would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to *CEQA Guidelines* Section 15064.5?

Less than Significant Impact

According to the General Plan, 65 cultural resource sites are known to occur within the City, based on a review of official records. The majority of cultural resources in the City are prehistoric sites with one that has both a prehistoric and a historic component.

Any future development projects that would implement Sustainability Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainability Plan. According to the General Plan Conservation Element, the City shall also use the environmental review process to preserve archaeological resources. Additionally, General Plan Conservation Element Policies 8.1 and 8.2 incorporate specific measures to preserve historic and prehistoric sites, and cultural and archaeological resources. Preservation could include the professional retrieval of artifacts prior to the development of a site or curation of any recovered artifacts as a condition of any cultural resources mitigation program. Therefore, potential impacts to archaeological resources as a result of implementation of the Sustainability Plan would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

No Impact

There are no known unique paleontological resources or geologic features in the City. The Sustainability Plan would result in resource efficiencies and emission reductions and does not propose land uses that would result in ground disturbance. Any future development projects that would implement Sustainability Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts related to ground disturbance and potential paleontological resources. Therefore, the implementation of the Sustainability Plan would result in less than significant impact. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Less than Significant Impact

Human remains are known to occur at one of the prehistoric sites in the City. Human burials have specific provisions for treatment in Section 5097 of the California Public Resources Code. Disturbing human remains could also violate the California Health and Safety Code, Section 7050.5. The General Plan Conservation Element Policy 8.1 also incorporates specific measures to preserve historic and prehistoric sites.

Therefore, through compliance with the California Public Resources Code, the California Health and Safety Code, and General Plan policy, potential impacts to historic and prehistoric sites, and human remains, as a result of implementation of the Sustainability Plan would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Geology and Soils

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐

Geology and Soils

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Would the project:

a) **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

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

Less than Significant Impact

According to the City's General Plan, no active or potentially active faults are known to occur within or adjacent to the City. The Rose Canyon Fault Zone, located approximately 10 miles west of the City, is the closest known active fault. Earthquakes that might occur on the Rose Canyon Fault Zone or other faults within the southern California and northern Baja California area are potential generators of significant ground motion in the City. However, the seismic risk within the City is not considered significantly greater than that of the surrounding municipalities and the San Diego County area in general. Since no Alquist-Priolo Earthquake Fault Zones exist within the City, there are no restrictions on development related to the Alquist-Priolo requirements.

In addition, implementation of the Sustainability Plan would not result in an increased demand for housing and contains no housing component. Therefore, implementation of the Sustainability Plan would not result in an increase in population that could be exposed to rupture of a known earthquake fault. Implementation of the Sustainability Plan would include construction of energy-efficient retrofits or clean energy facilities. These structures could be affected by effects of fault rupture; however, impacts associated with rupture of a known fault would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

ii) Strong seismic ground shaking?

Less than Significant Impact

Any future development projects that would implement Sustainability Plan measures would be subject to the Uniform Building Code (UBC) and the California Building Code (CBC); therefore, the design and construction of the structures would be engineered to withstand the expected ground acceleration that may occur in the City from regional active faults. Proper engineering and adherence to the UBC and CBC guidelines would minimize the risk to life and property from potential ground motion. Therefore, impacts associated with strong seismic ground shaking would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact

Liquefaction is a phenomenon where loose, saturated, and relatively uncohesive soil deposits lose strength during strong ground motions. Primary factors controlling the development of liquefaction include intensity and duration of ground accelerations, characteristics of the subsurface soil, *in situ* stress conditions, and depth to groundwater. According to the City's General Plan, no active or potentially active faults are known to occur within or adjacent to the City. Therefore, impacts associated with seismic-related ground failure, including liquefaction, would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

iv) Landslides?

Less than Significant Impact

According to the City's General Plan, no active or potentially active faults are known to occur within or adjacent to the City. In addition, General Plan Policies 1.2 and 1.3 provide hillside development guidelines and encourage the preservation of hillsides with steep slopes to minimize danger from landslides. Due to hillside management and low potential for ground shaking, it is unlikely that landslides would occur in the City. Therefore, impacts associated with landslides would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Less than Significant Impact

According to the City's General Plan, the geologic stratigraphy of the City consists of several surficial soil types including fill, topsoil, colluvium, and alluvium. Soils located within valley and drainage bottoms are susceptible to erosion. One of the General Plan Conservation Element objectives is to reduce the amount of erosion of soil in the City. General Plan Policies 4.1 and 4.2 require that appropriate soils and geologic surveys be completed for all proposed development and require appropriate grading, erosion control measures, and replanting to minimize erosion and prevent slippage of man-made slopes (City of Santee 2003). In addition, the Regional Water Quality Control Board (RWQCB) requires Storm Water Pollution Prevention Plans (SWPPPs) prior to construction. SWPPPs have extensive erosion control

measures to ensure that erosion is limited to the fullest extent feasible. Compliance with the General Plan and construction period SWPPP would ensure a less than significant impact. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less than Significant Impact

As discussed in Geology and Soils Impacts (a and b), impacts associated with landslides and liquefaction would be less than significant. General Plan Policy 4.1 requires that appropriate soils and geologic surveys be completed for all proposed development. Therefore, unstable soil would be identified prior to construction, and impacts associated with geology unit or soil instability would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?

Less than Significant Impact

Expansive soils have the potential to significantly shrink or swell with changes in moisture content. General Plan Policy 4.1 requires that appropriate soils and geologic surveys be completed for all proposed development. Any future development projects that would implement Sustainability Plan measures would be subject to these surveys and the UBC, which would ensure that they are developed in a way that minimizes the possible effects of expansive soils. Compliance with existing code regulations would ensure a less than significant impact. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

No Impact

The Sustainability Plan would not include strategies that would lead to development projects with septic tanks or alternative wastewater systems. Therefore, no impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of	☒	☐	☐	☐

Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
greenhouse gases?				
Would the project:				

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

Less than Significant Impact

California Health and Safety Code Section 38505(g) defines GHGs to include the following compounds: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). As individual GHGs have varying heat-trapping properties and atmospheric lifetimes, GHG emissions are converted to carbon dioxide equivalent (CO_2e) units for comparison. Using CO_2e units is a consistent methodology for comparing GHG emissions because it normalizes various GHG emissions to a directly comparable measure. The most common GHGs related to human activity are CO_2 (CO_2e = 1), CH_4 (CO_2e = 21), and N_2O (CO_2e = 310).

Community: Based on preliminary calculations, unmitigated GHG emissions in the City would total 251,897 metric tons of carbon dioxide equivalents (MT CO_2e) in 2020, a 3 percent increase over baseline (2005) emissions. By 2035, communitywide emissions are expected to increase to 23 percent over 2005 levels to 298,257 MT CO_2e. Consistent with AB 32, the City has identified a 15 percent community reduction target below baseline (2005) emissions by 2020.

Implementation of existing State reduction programs adopted after 2005 (i.e., Renewable Portfolio Standard [RPS], updates to Title 24 Energy Efficiency Standards, and the implementation of the Clean Car Fuel Standard, commonly referred to as the Pavley Standard) is projected to reduce emissions to 202,273 MT CO_2e by 2020, which makes emissions in 2020 approximately 17 percent lower than baseline (2005) levels, and to 211,460 MTCO_2e in 2035, which is 13 percent lower than baseline levels.

Implementation of the measures and actions that would be contained in the Sustainability Plan is projected to result in a further emissions reduction of 26,708 MT CO_2e by 2020 and 102,169 MT CO_2e by 2035. Total adjusted community emissions, which include reductions from both the Sustainability Plan measures and the State and local reduction programs, would be 175,565 MT CO_2e by 2020 and 109,291 MT CO_2e by 2035. Therefore, GHG emissions would be reduced by approximately 28 percent by 2020 and by 55 percent by 2035 from baseline (2005) levels, respectively, which would meet the applicable AB 32 targets and be aligned with the targets from EO S-3-05 and EO B-30-15.

Proposed Sustainability Plan measures and actions would achieve these reductions by reducing emissions. This reduction would be achieved by decreasing energy consumption in existing and new residential and commercial buildings, increasing water efficiency, increasing awareness of sustainability issues, reducing landfilled waste, promoting clean energy use, expanding sustainable transportation options, optimizing vehicular travel, and applying CEQA screening tables on new developments.

Municipal: Based on preliminary calculations, unmitigated municipal GHG emissions in the City would total 1,948 MT CO_2e in 2020, an 18 percent increase over baseline (2005) emissions. By 2035,

communitywide emissions are expected to increase to 23 percent over 2005 levels to 2,031 MT CO_2e. Consistent with AB 32 and communitywide goals, the City has identified a 15 percent municipal reduction target below baseline (2005) emissions by 2020.

Implementation of existing State reduction programs adopted after 2005 (i.e., RPS, updates to Title 24 Energy Efficiency Standards, and the implementation of the Clean Car Fuel Standard, commonly referred to as the Pavley Standard) is projected to reduce municipal emissions to 1,611 MT CO_2e by 2020, which makes emissions in 2020 approximately 3 percent lower than baseline (2005) levels, and to 1,681 MT CO_2e in 2035, which is 1 percent higher than baseline levels.

Implementation of the measures and actions that would be contained in the Sustainability Plan is projected to result in a further emissions reduction of 260 MT CO_2e by 2020 and 1,050 MT CO_2e by 2035. Total adjusted municipal emissions, which include reductions from both the Sustainability Plan measures and the State and local reduction programs, would be 1,351 MT CO_2e by 2020 and 631 MT CO_2e by 2035. Therefore, GHG emissions would be reduced by 18 percent by 2020 and by 62 percent by 2035 from baseline (2005) levels, respectively, which would meet the applicable AB 32 targets and be aligned with the targets from EO S-3-05 and EO B-30-15.

Proposed Sustainability Plan in and of its self would not generate greenhouse gas emissions. It would be a policy document that would include measures and actions to achieve applicable reductions by reducing emissions. The reductions would be achieved by decreasing energy consumption in municipal buildings, increasing water efficiency, promoting clean energy use, expanding sustainable transportation options, and optimizing vehicular travel. **This topic will be explained in detail but will not be analyzed in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Potentially Significant Impact

The Sustainability Plan would include a baseline GHG emissions inventory, a methodology for tracking and reporting emissions in the future, and requirements and recommendations for GHG reduction strategies as a foundation for these efforts. An indicator of the success of these efforts will be a measured reduction in GHG emissions using the protocols in the Sustainability Plan. The Sustainability Plan is another tool that can be used to guide development to achieve the City's GHG reduction goals. The proposed project's consistency with General Plan policies and statewide and regional goals will be analyzed in the PEIR. **This topic will be analyzed in the PEIR, and mitigation will be developed and included in the PEIR, if necessary, to address potentially significant adverse impacts related to any conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.**

Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site that 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?	☐	☐	☒	☐
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 for people residing or working in the project area?	☒	☐	☐	☐
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

The City falls under the jurisdiction of the San Diego County Hazardous Waste Management Plan, which is the primary planning document providing overall policy on hazardous waste management in the County. In addition, the City's General Plan addresses hazardous materials in the Safety Element.

Would the project:

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

Less than Significant Impact

Implementation of the Sustainability Plan would not result in the routine transport, use, or disposal of hazardous materials. Construction activities associated with retrofit/renovation projects or new mixed-

use or transit-oriented development projects that would be recommended by the Sustainability Plan may require use of common but potentially hazardous construction materials, including vehicle fuels, paints, cleaning materials, and caustic construction compounds. If incorrectly transported, handled, or disposed of, these substances could pose a potential health risk to construction workers and to the general public. However, the transport and handling of these common, potentially hazardous materials at the project site would occur in accordance with California Occupational Safety and Health Administration (Cal OSHA) guidelines. Further, such materials would be disposed of in accordance with California Department of Toxic Substances Control (DTSC) and County regulations. Adherence to Federal, State, and local regulations regarding the use and disposal of hazardous materials and wastes would reduce to a Less than Significant level the potential for impacts to human health and safety and the environment in relation to the handling, disposal, and transport of hazardous construction materials. Therefore, implementation of the Sustainability Plan would have a less than significant impact related to this environmental issue. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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?

Less than Significant Impact

Implementation of the Sustainability Plan would likely result in the renovation of older residential and commercial structures within the City. Structures built prior to 1978 may include asbestos-containing materials (ACMs) and lead-based paint (LBP). If not properly handled and released into the environment in large enough quantities, these materials could pose a threat to construction workers and public safety. However, demolition and construction activities involving hazardous materials removal are heavily regulated and construction workers must comply with applicable Federal and State safety regulations. Compliance with such regulations would reduce the risk on the surrounding environment and worker health to a less than significant impact. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Less than Significant Impact

As discussed in Hazards and Hazardous Materials Impacts (a and b), any future development projects that would implement Sustainability Plan measures would be subject to Federal, State, and local regulations regarding the use and disposal of hazardous materials and wastes. Therefore, indirect effects associated with future projects, including sites within one-quarter mile of an existing or proposed school would have a less than significant impact due to compliance with such regulations. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Less than Significant Impact

According to the DTSC EnviroStor and California State Water Resources Control Board (SWRCB) GeoTracker databases, there are approximately 130 hazardous materials/waste cleanup and/or permitted sites in the City (DTSC 2016; SWRCB 2016). Any future development projects that would implement Sustainability Plan measures would be subject to environmental review, which would include a search of appropriate databases (i.e., EnviroStor, GeoTracker) to determine whether the proposed site is a listed hazardous materials site and the status of the site (i.e., whether further evaluation or cleanup action is required or if the case has received regulatory closure and no further action is required). If located on a listed hazardous materials site, the proposed project would be required to comply with applicable Federal, State, and local regulations related to hazardous materials, which would ensure there would be minimal risk of significant hazard to the public or the environment. Therefore, this impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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 use airport, would the project result in a safety hazard for people residing or working in the project area?

Potentially Significant Impact

The southern and central portions of the City are located within the airport influence areas of Gillespie Field and Marine Corps Air Station (MCAS) Miramar (Ricondo & Associates, Inc. 2010; Mead & Hunt 2011). As described in Aesthetics impact (d), large solar arrays may result in noticeable glare during the day. Therefore, implementation of the Sustainability Plan could pose an aviation safety hazard from the glare that could result from the energy-generating rooftop structures, particularly if large solar arrays are installed. Implementation of the Sustainability Plan could result in a potentially significant impact. **This topic will be analyzed in the PEIR, and mitigation will be developed and included in the PEIR, if necessary, to address potentially significant adverse impacts related to any safety hazards for people residing or working in the project area.**

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact

There are no private airports or airfields located within the City limits. Therefore, implementation of the Sustainability Plan would not result in a safety hazard associated with a private airstrip. No impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Less than Significant Impact

The Sustainability Plan would encourage more efficient land use and transit-oriented development, so it is possible that future projects that implement the strategies of the Sustainability Plan could require temporary road closures during their construction, which could adversely affect evacuation during an emergency event or emergency response. However, any closures would be short term and alternate routes would be provided as necessary. It is unlikely that these actions would significantly interfere with adopted emergency response or evacuation plans. Furthermore, all future proposed projects would be subject to further CEQA analysis of project-specific impacts. Therefore, this impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less than Significant Impact

According to Cal Fire, the northern and southwestern portions of the City are designated as Very High Fire Hazard Severity Zones located in local responsibility areas. The Santee Fire Department provides fire protection services and responds to urban and wildland fires in the City. In addition, the Fire Department administers a weed abatement ordinance to reduce the risk of structural damage from wildfires.

Any future development projects that would implement Sustainability Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainability Plan. To address fire and life safety issues on new development, the City's Fire Marshal reviews all proposed residential, commercial and industrial projects through the City's Development Review process. Therefore, implementation of the Sustainability Plan would not increase exposure of people or structures to wildland fires and impacts would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for	☐	☐	☒	☐

Hydrology and Water Quality Would the project: which permits have been granted)?	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) 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 that would result in substantial erosion or siltation onsite or offsite?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite?	☐	☐	☒	☐
e) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area, as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place structures that would impede or redirect flood flows within a 100-year flood hazard area?	☐	☐	☒	☐
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j) Expose people or structures to inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Less than Significant Impact

The Sustainability Plan would be a policy document that would not propose any new development, but it does include goals and strategies that may result in future development projects that could potentially have environmental impacts. The possible violation of water quality standards or waste discharge requirements may result from runoff during future construction activities. As shown in Land Use and Planning Impact (b), the Sustainability Plan would be consistent with the City's General Plan. Development of projects in the City that implement the Sustainability Plan strategies would be subject

to General Plan Conservation Element Policies 9.1 through 9.5, which aim to identify and eliminate urban runoff problems before development is approved and require new construction to utilize best management practices (BMPs) to reduce pollutants in urban runoff and storm water discharge. Therefore, the impacts would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

Less than Significant Impact

Implementation of the Sustainability Plan would not result in a substantial (if any) increase in impervious surfaces in the City. The Sustainability Plan would promote development in transit-oriented areas, which are already developed with impervious surfaces. The Sustainability Plan would not increase the impermeable surface area such that groundwater recharge would be substantially affected. Energy-efficiency retrofits for existing residential and commercial buildings and installation of renewable energy-generating facilities (such as solar arrays) would not increase impermeable surface area in the City. Installation of renewable energy-generating facilities in open areas may result in a minor increase in impermeable surface area. However, the Sustainability Plan would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. The impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

c) 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 that would result in substantial erosion or siltation onsite or offsite?

Less than Significant Impact

Any future development projects that would implement Sustainability Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainability Plan. In addition, the City's General Plan Conservation Element encourages the protection of waterways and drainage courses. Therefore, the Sustainability Plan would not result in any substantial alteration of existing drainage patterns and impacts would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite?

Less than Significant Impact

Refer to discussion in Hydrology and Water Quality Impact (c) above. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

e) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact

Refer to discussion in Hydrology and Water Quality Impacts (a and c) above. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

f) Otherwise substantially degrade water quality?

Less than Significant Impact

Refer to discussion in Hydrology and Water Quality Impact (a) above. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

g) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact

The Sustainability Plan would not include a housing component; therefore, there would be no impact. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

h) Place structures that would impede or redirect flood flows within a 100-year flood hazard area?

Less than Significant Impact

As discussed above, the Sustainability Plan would not propose any new development, but it does include goals and strategies that may result in future development projects that could potentially have environmental impacts. However, per the City's General Plan Conservation Element Policy 2.7, all development proposals must be located outside of designated floodways and all development in the 100-year floodplain must be consistent with the City's Flood Damage Protection Ordinance. Development of projects in the City that implement the Sustainability Plan strategies would be subject to General Plan policies and City ordinances. Additionally, it is unlikely that the types of new development that would be built to implement the goals and actions of the Sustainability Plan would include the type and size of structures that could impede or redirect flood flows. Therefore, the impacts would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less than Significant Impact

The central portion of the City is located in the San Diego River Valley downstream of three major dams in San Diego County: the San Vicente Dam, the El Capitan Dam, and the Chet Harritt Dam (Lake Jennings) (City of Santee 2003). Installation of renewable energy-generating facilities (such as solar arrays) may be installed on existing or new buildings downstream of these dams. However, the installation of solar arrays on existing or new buildings does not increase the exposure of people or structures to flood related injury or loss. In addition, the City's General Plan Safety Element outlines policies (1.1 through

1.9) to minimize injuries, loss of life and property damage resulting from flood hazards, including dam failure. Implementation of these policies includes an annual review of these dams by the California Department of Water Resources, Division of Dam Safety. No hazardous conditions have been identified. Therefore, the impact of implementing the Sustainability Plan would be less than significant. **This topic will not be analyzed further in the EIR unless new information identifying a potential impact is presented during the scoping process.**

j) Expose people or structures to inundation by seiche, tsunami, or mudflow?

No Impact

A seiche is the periodic oscillation of a body of water resulting from seismic shaking. The City is not close to any big lakes, so seiche is unlikely to occur. A tsunami is a very large ocean wave caused by an underwater earthquake or volcanic eruption. The City is located approximately 14 miles inland from the Pacific Ocean, so people or structures in the City would not be exposed to inundation by tsunami. Mudflows are shallow water-saturated landslides that travel rapidly down slopes carrying rocks, brush, and other debris. As discussed in Geology and Soils Impact (a, iv), landslides are unlikely to occur due to the low potential for ground shaking in the area. Thus, it is unlikely that the project site would be subject to inundation by a seiche, tsunami, or mudflow. Therefore, there is no impact. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Land Use and Planning

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☒	☐	☐	☐

Would the project:

a) Physically divide an established community?

No Impact

The Sustainability Plan would not propose changes to existing land use designations. Instead, it would propose strategies that would improve pedestrian and bicycle mobility as well as promote the use of alternative transportation. The Sustainability Plan would encourage the creation and/or expansion of infrastructure that improves connectivity throughout the community. Therefore, no impact would occur as a result of the Sustainability Plan's implementation. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact

While a separate document, the Sustainability Plan would be utilized as a companion document to the City's General Plan to provide a more comprehensive and detailed framework for land-based policy decisions to reduce greenhouse gas emissions from existing and future development. All of the policies in the City's General Plan were written to maximize efficient use of resources, maintain a high quality of life, enhance job opportunities, promote sustainability, and facilitate access to transportation facilities. Any facilities developed pursuant to the Sustainability Plan would be required to be consistent with General Plan policies to obtain approval. Therefore, the Sustainability Plan would be consistent with the General Plan and the impact is considered less than significant. **However, this topic will be analyzed in the PEIR, which will provide a more comprehensive discussion of the proposed project's consistency with the adopted plans. Mitigation will be developed and included in the PEIR, if necessary, to address potentially significant adverse impacts related to potential conflict with applicable plans adopted for the purpose of avoiding or mitigation an environmental effect.**

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Potentially Significant Impact

As discussed in Biological Resources Impacts (f), the San Diego Multiple Species Conservation Program (MSCP) is the Natural Community Conservation Plan for San Diego County (City of San Diego 1998). The MSCP allows local jurisdictions to maintain land use control and implement their respective portions of the MSCP through Subarea Plans. The City is drafting its Subarea Plan which will act as a Habitat Conservation Plan in combination with the MSCP. The City's MSCP Subarea Plan aims to balance development needs with habitat conservation and ultimately protects one-fourth of the City as permanent open space (City of Santee 2003). The Plan will also specify where future development and habitat preservation are expected to occur and what mitigation will be required of future development.

Once the Subarea Plan is adopted, any future development projects that would implement Sustainability Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainability Plan. Therefore, implementation of the Sustainability Plan would not result in any conflict with approved conservation plans. Impacts would be less than significant. **This topic will be analyzed in the PEIR, which will provide a more comprehensive discussion of the proposed project's consistency with the adopted plans. Mitigation will be developed and included in the PEIR, if necessary, to address potentially significant adverse impacts related to applicable habitat conservation plans, natural community conservation plans.**

Mineral Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Mineral Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

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?

Less than Significant Impact

Valuable sand, gravel and crushed rock resources, extremely important to the construction industry, are found in the City of Santee. There are two designated mineral resources zones (MRZ) in the City: MRZ-2 (areas where adequate information exists to indicate that significant mineral deposits are present or where it was judged that a high likelihood for their presence exists) and MRZ-3 (areas containing mineral deposits whose significance cannot be evaluated from available data). The areas designated in the MRZ-2 zone are primarily along the floodplain of the San Diego River and on hills underlain by granitic rocks. The remainder of the City is designated as MRZ-3.

Apart from mining operations, loss of the availability of mineral resources generally is due to the placement of incompatible land uses, which either directly or indirectly make the resource inaccessible for future extraction. The Sustainability Plan would not propose improvements or changes to existing land use designations. Therefore, implementation of the Sustainability Plan would not result in the significant loss of availability of a known mineral resource. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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?

Less than Significant Impact

As discussed in Mineral Resources Impact (a) above, the Sustainability Plan would not propose improvements or changes to existing land use designations. Therefore, implementation of the Sustainability Plan would not result in the significant loss of a locally important mineral resource recovery site. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Noise

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

Noise

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Would the project:

a) Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact

Implementation of the Sustainability Plan would reduce VMT, thus reducing total vehicular noise in the City. The Sustainability Plan implementation would not add vehicle trips. Implementation of the policies and programs of the Sustainability Plan would augment existing City programs and policies with regard to transit-oriented development. Energy retrofits would likely reduce impacts from vehicular noise to occupants of the particular buildings, since increased insulation and double- or triple-paned windows also would act to buffer exterior noise levels. Installation activities for energy retrofits on existing residential and commercial buildings, or installation of renewable energy facilities such as photovoltaic arrays, may result in temporary increases in noise; however, it is anticipated that such activities would not require large construction equipment that would result in substantial noise. Additionally, each specific development project would undergo evaluation and noise study and mitigation measures if above normally acceptable levels defined in the General Plan prior to project approval for consistency with General Plan policies and standards. There would be less than significant noise impacts from implementation of the Sustainability Plan. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

b) Expose persons to or generate excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact

Implementation of the Sustainability Plan would not result in vibration-generating facilities. Construction vibration that could occur during energy-efficiency retrofit or installation of photovoltaic arrays would not be substantial, and if these activities were to occur on or near fragile buildings, all

appropriate measures would be required pursuant to the General Plan Noise Element objectives and policies to 1) control noise from sources adjacent to residential, institutional and other noise-sensitive receptors and 2) ensure that future developments will be constructed to minimize interior and exterior noise levels. Renewable energy-generating structures such as solar arrays do not produce substantial vibration and would be located on rooftops of existing or new structures. If such facilities were to be proposed for fragile buildings or areas of sensitive receptors, appropriate mitigation or design revision would be required either through the City's design review or plan check process to ensure that the structures would not generate excessive ground borne vibration or noise during operation. Therefore, the impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

c) Cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact

Implementation of the Sustainability Plan would reduce VMT, thus reducing total vehicular noise in the City. The Sustainability Plan implementation would not add vehicle trips. Implementation of the policies and programs of the Sustainability Plan would augment existing City programs and policies with regard to transit-oriented development. Energy retrofits would likely reduce impacts from vehicular noise to occupants of the particular buildings, since increased insulation and double- or triple-paned windows also would act to buffer exterior noise levels. Any noise generated during construction activities would be temporary. Thus, there would be no substantial permanent noise impacts from implementation of the Sustainability Plan. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

d) Cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact

Potential construction activities from implementation of the Sustainability Plan would be energy retrofits on existing residential and commercial buildings, and installation of renewable energy facilities such as photovoltaic arrays. However, as discussed above, energy-efficiency retrofit or installation of photovoltaic arrays would not be substantial, and if these activities have the potential to exceed the City's noise thresholds, a noise study and all appropriate measures would be required pursuant to the General Plan Noise Element objectives and policies to 1) control noise from sources adjacent to residential, institutional and other noise-sensitive receptors and 2) ensure that future developments will be constructed to minimize interior and exterior noise levels. Therefore, the impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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 expose people residing or working in the project area to excessive noise levels?

No Impact

The nearest airports to the City are Gillespie Field and MCAS Miramar, located to the south and west of the City. However, the Sustainability Plan would not include strategies associated with airports, and

would not result in a significant impact on future air traffic operations. Therefore, noise-sensitive land uses would not be exposed to excessive noise levels from aviation noise as a result of the Sustainability Plan. No impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact

There are no private airports or airfields located within the City limits. Therefore, the proposed project would not expose people to excessive noise levels associated with a private airstrip. No impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Population and Housing

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Would the project:

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

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

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact

The Sustainability Plan would not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning; therefore, it would not change resident population or total jobs in the City.

Implementation of the Sustainability Plan would not induce substantial population growth that could exceed local and regional growth projections either directly or indirectly. The Sustainability Plan implementation would not result in an increased demand for housing and would not contain a housing component. Implementation of the Sustainability Plan also would not displace substantial numbers of

people or existing housing. Therefore, there would be no impact on population and housing. **These topics will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Public Services

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

Would the project:

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

i) Fire protection?

ii) Police protection?

iii) Schools?

iv) Parks?

v) Other public facilities?

No Impact

The Sustainability Plan would not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning, so it would not change resident population or total jobs in the City. Demand for public services, including all the services above, is based on service population, which is a total of resident population and jobs. Thus, the nature of the project would not affect the demand for public services. Therefore, there would be no impact. **These**

topics will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.

Recreation

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Would the project:

a) 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?

No Impact

The Sustainability Plan would not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning; therefore, it would not change resident population or total jobs in the City.

Implementation of the Sustainability Plan would not increase resident population in the City. Demand for parks and recreational facilities is based on population. As there would be no population increase as a result of implementation of the Sustainability Plan, there would be no need for the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. No impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

No Impact

No new recreational facilities or expansion of existing facilities are proposed as part of the Sustainability Plan, nor would any be warranted or required for implementation of the Sustainability Plan. Therefore, no impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Transportation/Traffic

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐

Would the project:

a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

No Impact

Implementation of the Sustainability Plan measures and actions would encourage the use of transit service, add additional bicycle infrastructure (consistent with regional and local plans), and discourage single-occupancy vehicle use. Achieving each of these goals would result in a reduction in traffic loads, which would reduce the number of vehicle trips, volume to capacity ratio, and intersection congestion within the City. Furthermore, no proposed measure or action would directly increase traffic in relation to the existing traffic load and capacity of the system. Therefore, implementation of the Sustainability

Plan would have a beneficial impact on transportation in the City compared to current conditions. No impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?

No Impact

Refer to Transportation/Traffic Impact (a). Implementation of the Sustainability Plan would have a beneficial effect in alleviating congestion by reducing VMT and facilitating alternative modes of transportation. No impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?

No Impact

Refer to Transportation/Traffic Impact (a). Implementation of the Sustainability Plan would not result in changes in air traffic. As such, no impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

No Impact

The Sustainability Plan would not include facilities that would substantially increase hazards, nor would it construct incompatible uses. Furthermore, any future development projects that would implement Sustainability Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainability Plan. The City's zoning regulations, standard development conditions, and design guidelines address site and building design. Therefore, the Sustainability Plan would not result in any substantial increase in hazards due to design features or incompatible uses. No impact would occur. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

e) Result in inadequate emergency access?

Less than Significant Impact

As discussed above in Hazards and Hazardous Materials Impact (g), the Sustainability Plan would encourage more efficient land use and transit-oriented development, so it is possible that future projects or actions could require temporary road closures during their construction, which could adversely affect evacuation during an emergency event or emergency response. However, any closures would be short term and alternate routes would be provided as necessary. It is unlikely that these actions would significantly interfere with adopted emergency response or evacuation plans. Furthermore, all future proposed projects would be subject to further CEQA analysis of project-specific impacts. Therefore, this impact would be less than significant. **This topic will not be analyzed further in**

the PEIR unless new information identifying a potential impact is presented during the scoping process.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially Significant Impact

Existing and planned bicycle facilities are identified in the City of Santee Bicycle Master Plan (KTU+A, 2009) the draft City of Santee Mobility Element (2017), and the 2050 Regional Transportation Plan (SANDAG, 2011). The Sustainability Plan would be consistent with this Master Plan by encouraging the expansion of bicycle routes throughout the City and promoting the use and expansion of alternative transportation services. As the Sustainability Plan would encourage alternative methods of transportation, such as public transit and bicycle facilities, it would be consistent with the intent of regional plans that seek to improve subregional and regional transportation. Therefore, implementation of the Sustainability Plan would not decrease the performance or safety of any alternative transportation facility. **This topic will be analyzed in the PEIR, which will provide a comprehensive discussion of the proposed project's consistency with the adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities.**

Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

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

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

Less than Significant Impact

The Sustainability Plan would not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning. Any future development projects that would implement Sustainability Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainability Plan. Because implementation of the Sustainability Plan does not propose any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning and because future development projects would be subject to independent environmental review, impacts to Traditional Cultural Resources (TCRs) that are listed or eligible for listing in the California Register of Historical Resources and local register of historic resources, as a result of implementation of the Sustainability Plan would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Less than Significant Impact

As identified in Cultural Resources, five historic sites have been recorded within the City, representing less than 10 percent of the total cultural resource inventory (City of Santee 2003). In addition, the City has one structure (Edgemoor Farm Dairy Barn) listed in the National Register of Historical Places and one registered Local Historic Landmark (James Love House). However, the Sustainability Plan would not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning. Any future development projects that would implement Sustainability Plan measures and actions would be subject to all applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the Sustainability Plan. Additionally, implementation of the Sustainability Plan would not propose any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning and future development projects would be subject to independent environmental review. Therefore, impacts to TCRs that are listed or eligible for listing in the California Register of Historical Resources or local register of historic resources would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐

Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider that 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?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with Federal, State, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than Significant Impact

The Sustainability Plan would not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning, so it would not change resident population or total jobs in the City. Therefore, the Sustainability Plan would not result in additional sources of wastewater. In addition, one of the goals of the Sustainability Plan would be to decrease water consumption, which would result in a reduction in wastewater generation. Therefore, implementation of the Sustainability Plan would not exceed the wastewater treatment requirements of the San Diego Regional Water Quality Control Board. This impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact

The Sustainability Plan would be a policy document that would not propose specific new development that would have the potential to increase population or result in the development of land uses that would increase demand for water supplies, water treatment, and wastewater treatment. In addition, one of the goals of the Sustainability Plan would be to decrease water consumption, thereby reducing the demand for potable water supplies, generation of wastewater, and the need for new or expanded treatment and distribution infrastructure. Therefore, implementation of the Sustainability Plan would not result in the construction or expansion of water or wastewater treatment facilities. This impact would be less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact

The Sustainability Plan would be a policy document that does not propose specific new development that would have the potential to increase the amount of surface runoff. Therefore, there would be no need to provide new or expanded storm water drainage facilities. If it is determined later that projects that would require storm water drainage facilities are needed to implement the goals and actions of the Sustainability Plan, then additional CEQA analysis would be conducted to determine the extent of possible impacts based on project-specific information. Therefore, the implementation of the Sustainability Plan would have a less than significant impact. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact

Implementation of the Sustainability Plan would not result in an increase in population. Thus, no new water supplies would be required. Furthermore, the Sustainability Plan would promote water conservation, which would actually reduce the City's water demand. Therefore, implementation of the Sustainability Plan would have a less than significant impact. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

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

Less than Significant Impact

Refer to discussion in Utilities and Service Systems Impact (b) above. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact

Implementation of the Sustainability Plan would not result in an increase in population. Thus, a significant increase in solid waste generation is not expected. In addition, the Sustainability Plan would encourage recycling and promotes the reduction of solid waste generation. Therefore, implementation of the Sustainability Plan would have a less than significant impact. **However, this topic will be analyzed further in the PEIR to provide a comprehensive discussion of the project's influence on the solid waste capacities of local landfill facilities.**

g) Comply with Federal, State, and local statutes and regulations related to solid waste?

No Impact

The Sustainability Plan would not recommend any strategy or measure that does not comply with applicable solid waste regulations. Therefore, no impact would occur. **This topic will not be analyzed further in the EIR unless new information identifying a potential impact is presented during the scoping process.**

Mandatory Findings of Significance

Does the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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?	☐	☐	☒	☐
b) 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 projects, and the effects of probable future projects.)	☒	☐	☐	☐
c) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Does the project:

a) 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?

Less than Significant Impact

As discussed in Biological Resources, implementation of the Sustainability Plan would not result in development in areas of sensitive biological habitat, wetlands, or riparian areas, nor would it interfere with wildlife movement. Continued compliance with existing regulations would ensure that future projects would have a less than significant impact on plant and wildlife species and their habitat. Furthermore, future projects intended to implement the goals and actions of the Sustainability Plan would be subject to applicable Federal, State, and local regulations that protect such resources. This impact is less than significant.

As discussed in Cultural Resources, implementation of the Sustainability Plan would have no direct impact on prehistoric and historic resources. Continued compliance with existing regulations would ensure that the Sustainability Plan would have a less than significant impact on prehistoric and historic resources. Furthermore, future projects intended to implement the goals and actions of the Sustainability Plan would be subject to further CEQA analysis of project-specific impacts. This impact is less than significant. **This topic will not be analyzed further in the PEIR unless new information identifying a potential impact is presented during the scoping process.**

b) 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 projects, and the effects of probable future projects.)

Potentially Significant Impact

The Sustainability Plan could potentially result in adverse environmental impacts that are cumulatively considerable. The purpose of the Sustainability Plan would be to contribute to a cumulative reduction in GHG emissions, which would have beneficial cumulative environmental effects. However, as discussed in the sections on Hazards and Hazardous Materials and Aesthetics, strategies and measures that would be proposed in the Sustainability Plan may result in indirect adverse environmental impacts. Such impacts could include potential glare impacts and change in existing visual character from PV facilities. **These adverse impacts are considered potentially significant and will be analyzed further in the PEIR. Mitigation will be developed and included in the PEIR, if necessary, to address potentially significant adverse impacts related to historic resources.**

c) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact

Implementation of the Sustainability Plan could potentially result in substantial adverse effects on human beings, indirectly, such as potential glare impacts from PV facilities. As discussed in Hazards and Hazardous Materials, implementation of the Sustainability Plan could pose an aviation safety hazard from the glare that could result from the energy-efficient or energy-generating rooftop structures, particularly if large solar arrays are installed. **This impact is considered potentially significant and will be analyzed further in the PEIR. Mitigation will be developed and included in the PEIR, if necessary, to address potentially significant adverse impacts related to historic resources.**

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5.0 REPORT PREPARERS

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Autumn Galambos	Environmental Planner
Sarah Halterman	Assistant Environmental Planner

APPENDIX A-3: SCOPING MEETING

Appendix A-3.a: Scoping Meeting Agenda

City of Santee

Scoping Meeting Agenda

DATE: August 31, 2017

Informal Open House—4:00 pm to 4:45 pm

- Handouts:
  - Notice of Preparation
  - Comment/Speaker Cards
- Documents Available for Review:
  - Initial Study
  - Notice of Preparation
- Project Team available for informal questions:

Presentation—4:45 pm to 5:00 pm

- Overview of the Sustainable Santee Plan
  - Background
  - Goals and Objectives
  - Components of the Plan
  - How the City will use the Plan
- Overview of the Environmental Impact Report (EIR) Process:
  - Purpose of the EIR
  - Approximate Schedule of the Process

Public Comments—5:00 pm to 6:00 pm

- Those wishing to make oral public comments during the meeting need to fill out speaker cards.

Appendix A-3.b: Scoping Meeting Comment Cards

Comment Card

Please provide your comments below. Use back of card if more space is needed.

Project: Draft Program Environmental Impact Report for the Sustainable Santee Plan

Community Choice Energy (CCA) should be an essential element of the Preferred Alternative.

Name Van Collinsworth Telephone: _____

Address 9222 Lake Canyon Road City Santee Zip 92071

Signature Van Collinsworth Date 8/31/2017

Comment Card

Please provide your comments below. Use back of card if more space is needed.

Project: Draft Program Environmental Impact Report for the Sustainable Santee Plan

Name Haley Johnson Telephone: _____

Address Haley.Johnson@WeAreHarris.com City _____ Zip _____

Signature _____ Date _____

Comment Card

Please provide your comments below. Use back of card if more space is needed.

Project: Draft Program Environmental Impact Report for the Sustainable Santee Plan

Thank you for offering the meeting
I learned a lot & everyone was
friendly

Name Patti LaBouff Telephone: 619-306-4987

Address 8584 Fanita Drive City Santee Zip 92071

Signature Patti LaBouff Date 8-31-17

Comment Card

Please provide your comments below. Use back of card if more space is needed.

Project: Draft Program Environmental Impact Report for the Sustainable Santee Plan

sophie@climateactioncampaign.org

Name Sophie Wolfram Telephone: (914) 715-2451

Address Climate Action Campaign City San Diego Zip [redacted]

Signature S Wolfram Date 08/31/17

Comment Card

Please provide your comments below. Use back of card if more space is needed.

Project: Draft Program Environmental Impact Report for the Sustainable Santee Plan

Name Tom Blessent Telephone (619) 993 3561

Address 1903 Wright Place #220 City Carlsbad, CA Zip 92008

Signature [signature] Date 08/31/2017

APPENDIX A-4: COMMENT LETTERS

Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Ken Alex
Director

Memorandum

Date: September 12, 2017

To: All Reviewing Agencies

From: Scott Morgan, Director

Re: SCH # **2017081030**
Sustainable Santee Plan

Pursuant to the attached letter, the Lead Agency has *extended* the review period for the above referenced project to **October 2, 2017** to accommodate the review process. All other project information remains the same.

cc: John O'Donnell
City of Santee
10601 Magnolia Avenue
Santee, CA 92071

CITY OF SANTEE

September 11, 2017

State Clearinghouse
P.O. Box 3044
Sacramento, CA 95812-3044

Subject: **Sustainable Santee Plan –SCH Number 2017081030**

To provide additional time for public and agency review and comment of the Sustainable Santee Plan (State Clearinghouse Number 2017081030), we request that the review period for the Notice of Preparation (NOP) be extended until **October 2, 2017**.

Please contact me at (619) 258-4100 Ext. 182 or jodonnell@cityofsanteeca.us if you have any questions.

Respectfully,

John O'Donnell, AICP
Principal Planner

cc. File

NOI Distribution List CK

County: San Diego

SCH# 2017081030

Resources Agency

- [■] **Resources Agency**
  Nadell Gayou
  - [ ] **Dept. of Boating & Waterways**
    Denise Peterson
  - [ ] **California Coastal Commission**
    Allyson Hitt
  - [ ] **Colorado River Board**
    Lisa Johansen
  - [ ] **Dept. of Conservation**
    Crina Chan
  - [ ] **Cal Fire**
    Dan Foster
  - [ ] **Central Valley Flood Protection Board**
    James Herota
  - [ ] **Office of Historic Preservation**
    Ron Parsons
- [■] **Dept of Parks & Recreation**
  Environmental Stewardship Section
  - [ ] **S.F. Bay Conservation & Dev't. Comm.**
    Steve Goldbeck
  - [ ] **Dept. of Water Resources**
    Resources Agency
    Nadell Gayou

Fish and Game

- [ ] **Depart. of Fish & Wildlife**
  Scott Flint
  Environmental Services Division
- [ ] **Fish & Wildlife Region 1**
  Curt Babcock
- [ ] **Fish & Wildlife Region 1E**
  Laurie Harnsberger
- [ ] **Fish & Wildlife Region 2**
  Jeff Drongesen
- [ ] **Fish & Wildlife Region 3**
  Craig Weightman
- [ ] **Fish & Wildlife Region 4**
  Julie Vance
- [ ] **Fish & Wildlife Region 5**
  Leslie Newton-Reed
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6**
  Tiffany Ellis
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6 I/M**
  Heidi Calvert
  Inyo/Mono, Habitat Conservation Program
- [ ] **Dept. of Fish & Wildlife M**
  William Paznokas
  Marine Region

Other Departments

- [ ] **California Department of Education**
  Lesley Taylor
- [ ] **OES (Office of Emergency Services)**
  Monique Wilber
- [ ] **Food & Agriculture**
  Sandra Schubert
  Dept. of Food and Agriculture
- [ ] **Dept. of General Services**
  Cathy Buck
  Environmental Services Section
- [ ] **Housing & Comm. Dev.**
  CEQA Coordinator
  Housing Policy Division

Independent Commissions,Boards

- [ ] **Delta Protection Commission**
  Erik Vink
- [ ] **Delta Stewardship Council**
  Kevan Samsam
- [ ] **California Energy Commission**
  Eric Knight
- [■] **Native American Heritage Comm.**
  Debbie Treadway
- [ ] **Public Utilities Commission**
  Supervisor
- [ ] **Santa Monica Bay Restoration**
  Guangyu Wang
- [ ] **State Lands Commission**
  Jennifer Deleong
- [ ] **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Cal State Transportation Agency CalSTA

- [ ] **Caltrans - Division of Aeronautics**
  Philip Crimmins
- [ ] **Caltrans – Planning HQ LD-IGR**
  Christian Bushong
- [ ] **California Highway Patrol**
  Suzann Ikeuchi
  Office of Special Projects

Dept. of Transportation

- [ ] **Caltrans, District 1**
  Rex Jackman
- [ ] **Caltrans, District 2**
  Marcelino Gonzalez
- [ ] **Caltrans, District 3**
  Eric Federicks – South
  Susan Zanchi - North
- [ ] **Caltrans, District 4**
  Patricia Maurice
- [ ] **Caltrans, District 5**
  Larry Newland
- [ ] **Caltrans, District 6**
  Michael Navarro
- [ ] **Caltrans, District 7**
  Dianna Watson
- [ ] **Caltrans, District 8**
  Mark Roberts
- [ ] **Caltrans, District 9**
  Gayle Rosander
- [ ] **Caltrans, District 10**
  Tom Dumas
- [ ] **Caltrans, District 11**
  Jacob Armstrong
- [ ] **Caltrans, District 12**
  Maureen El Harake

Cal EPA

Air Resources Board

- [ ] **Airport & Freight**
  Jack Wursten
  - [ ] **Transportation Projects**
    Nesamani Kalandiyur
  - [ ] **Industrial/Energy Projects**
    Mike Tollstrup
- [ ] **California Department of Resources, Recycling & Recovery**
  Sue O'Leary
- [ ] **State Water Resources Control Board**
  Regional Programs Unit
  Division of Financial Assistance
- [ ] **State Water Resources Control Board**
  Cindy Forbes – Asst Deputy
  Division of Drinking Water
- [ ] **State Water Resources Control Board**
  Div. Drinking Water #_____
- [ ] **State Water Resources Control Board**
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] **State Water Resouces Control Board**
  Phil Crader
  Division of Water Rights
- [ ] **Dept. of Toxic Substances Control**
  CEQA Tracking Center
- [ ] **Department of Pesticide Regulation**
  CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- [ ] **RWQCB 1**
  Cathleen Hudson
  North Coast Region (1)
- [ ] **RWQCB 2**
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] **RWQCB 3**
  Central Coast Region (3)
- [ ] **RWQCB 4**
  Teresa Rodgers
  Los Angeles Region (4)
- [ ] **RWQCB 5S**
  Central Valley Region (5)
  - [ ] **RWQCB 5F**
    Central Valley Region (5)
    Fresno Branch Office
  - [ ] **RWQCB 5R**
    Central Valley Region (5)
    Redding Branch Office
- [ ] **RWQCB 6**
  Lahontan Region (6)
  - [ ] **RWQCB 6V**
    Lahontan Region (6)
    Victorville Branch Office
- [ ] **RWQCB 7**
  Colorado River Basin Region (7)
- [ ] **RWQCB 8**
  Santa Ana Region (8)
- [■] **RWQCB 9**
  San Diego Region (9)

- [ ] **Other** _____
  _____
  _____
- [ ] _____
  Conservancy

Last Updated 8/3/2107

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

September 13, 2017

Mr. John O'Donnell, Principal Planner
City of Santee Development Services Department
10601 Magnolia Avenue
Santee, CA 92071
jodonnell@cityofsanteeca.gov

Subject: Comments on the Notice of Preparation of a Programmatic Environmental Impact Report for the Sustainable Santee Plan, City of Santee, San Diego County, California (SCH No. 2017081030)

Dear Mr. O'Donnell:

The Department of Fish and Wildlife (Department) has reviewed the City of Santee's Notice of Preparation (NOP) and Initial Study (IS) for the Sustainable Santee Project (proposed project). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the proposed project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of Santee (City) participates in the NCCP program in preparing its draft Multiple Species Conservation Plan Subarea Plan (SAP).

The proposed project is intended to provide policy direction and identify actions the City and community will take to reduce the generation of greenhouse gas emissions consistent with California Assembly Bill 32 and Executive Order S-3-05. The purpose of the City's sustainability plan is to guide the development, enhancement, and implementation of actions and strategies that reduce the City's greenhouse gas emissions. The goal of the proposed project is to reduce the City's community-wide greenhouse gas emissions 15 percent below 2005 emissions by 2020, and 49 percent below 2005 emissions by 2035 in conformance with the Assembly Bill 32 Scoping Plan and in conformance with the goals set by Executive Order S-3-05. The proposed project would describe the existing regulations pertaining to climate change, calculate baseline greenhouse gas emissions produced within the City, project greenhouse gas emissions that could be expected if the proposed project is not implemented, identify reduction strategies to meet reduction targets, and calculate greenhouse gas emission reductions with the implementation of reduction measures.

The proposed project is located within the City, within eastern San Diego County, approximately 18 miles east of downtown San Diego. The City is bordered on the west and southwest by the City of San Diego and Marine Corps Air Station Miramar, on the south by the City of El Cajon, on the north by San Diego County, and on the east by the unincorporated communities of Lakeside and Eucalyptus Hills. The City is approximately 16.5 square miles supporting a population of approximately 58,000 residents.

We offer our comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating impacts to biological resources, and to ensure that the proposed project is consistent with ongoing regional habitat conservation planning efforts.

The analysis supporting each of the IS's CEQA determinations of significance (and ultimately, the Programmatic Environmental Impact Report's [PEIR] CEQA findings of significance) should clearly define the impacts anticipated to fall within the scope of the PEIR (e.g., reducing greenhouse gas emissions) versus those impacts that would result from subsequent project-level impacts. For example, the IS's *Environmental Checklist and Impact Evaluation: Biological Resources (b)* is clear that subsequent projects may require site-specific CEQA analysis by concluding, "...any future development projects that would implement Sustainability Plan measures and actions near waterways and open spaces would be subject to further CEQA analysis of project-specific impacts...." In contrast, the *Environmental Checklist and Impact Evaluation: Biological Resources (a)* states that specific projects could result in habitat removal but does not specify how the significance of those impacts will be evaluated.

We recommend that the text of the IS be revised for consistency. For example, the text within the IS contradicts the analyses presented within the IS checklist, *Biological Resources (a).* While the text of the IS states that "[t]he Sustainability Plan would not include any development proposals that would directly result in physical environmental effects due to the construction and operation of facilities" (p. 8), the IS checklist *Biological Resources (a)* states that projects adopted pursuant to the PEIR "...could result in removal of habitat or street trees..." (p. 21). Although it is reasonable for the PEIR to forecast potential impacts associated with future discretionary actions, the PEIR should not suggest that the IS's analysis is adequate for site-specific development or retrofits. Therefore, the Department recommends that all projects that tier from this PEIR and will impact natural resources require site-specific biological technical reporting, subsequent CEQA environmental documentation, and, when applicable, appropriate mitigation. The PEIR, the IS, and all other substantiating documentation should specify that impacts to wildlife species and their habitats will require subsequent, site-specific CEQA analysis.

The Department recommends the PEIR analyze the project, and reasonably foreseeable projects, for consistency with the City's draft SAP. Although draft, the City, Department, and U.S. Fish and Wildlife Service have collectively dedicated considerable time, resources, and funds in preparing the City's draft SAP. These efforts reflect conservation standards and conservation analysis critical to completing the City's SAP, and protecting sensitive plants, animals, and their habitats as memorialized in a July 29, 2014, letter to the Department. However, the IS does not acknowledge the considerable effort in developing the *draft* SAP, rather, it limits the analysis to *adopted plans.* "Implementation of energy production facilities could result in conflicts with *adopted plans* [emphasis added]" (p. 11). The Department continues to work with the City to advance the successful completion of the City's SAP. The Department believes that proactive planning efforts can successfully facilitate the Sustainable Santee Plan without adversely affecting the City's draft SAP.

We appreciate the opportunity to comment on the referenced NOP and IS. The Department requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of the forthcoming hearing date for the project (CEQA Guidelines; §15073(e)). Questions regarding this letter and further coordination on these issues should be directed to Eric Weiss at (858) 467-4289 or eric.weiss@wildlife.ca.gov.

Sincerely,

Gail K. Sevrens
Environmental Program Manager
South Coast Region

ec: Scott Morgan, State Clearinghouse, Sacramento
Doreen Stadtlander, U.S. Fish and Wildlife Service, Carlsbad
Eric Porter, U.S. Fish and Wildlife Service, Carlsbad

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
4050 TAYLOR STREET, MS 240
SAN DIEGO, CA 92110-2714
PHONE (619) 688-6968
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

September 14, 2017

11-SD-VAR
(52, 67, 125)
Sustainable Santee Plan
DEIR NOP SCH# 2017021030

Mr. John O'Donnell
Principal Planner
City of Santee
10601 Magnolia Avenue
Santee, CA 92071

Dear Mr. O'Donnell:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the Notice of Preparation for the Sustainable Santee Plan (Plan) Draft Environmental Impact Report (DEIR), area served by State Route 52 (SR-52), State Route 67 (SR-67), and State Route 125 (SR-125). The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multi-modal transportation network.

Caltrans supports the efforts of the City of Santee (City) to reduce greenhouse gas emissions. In June 2016, Caltrans approved the California Transportation Plan (CTP) 2040, the first California transportation plan published that provides a pathway for transportation to help meet the State's climate goals. The CTP 2040 is an expression of how the State will reinforce the region's efforts in Sustainable Communities Strategies and take conforming action for the interregional transportation system. Achieving the goal of the CTP 2040 through State-regional partnership efforts helps meet State-regional policy directives of livable communities, economic growth and emission reductions. It is also acknowledged that the CTP 2040 is aspirational in achieving greenhouse gas reductions, while the regional transportation plan must be revenue constrained, making it challenging to achieve desired outcomes.

The CTP 2040 is available here:
http://www.dot.ca.gov/hq/tpp/californiatransportationplan2040/2040.html

Land Use and Smart Growth

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

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP). Early coordination with Caltrans is encouraged in locations that may affect both Caltrans and the City.

Caltrans appreciates the continued coordination with the City of Santee. If you have any questions, please contact Vanessa De La Rosa, Transportation Planner, at (619) 688-4289 or by e-mail sent to vanessa.delarosa@dot.ca.gov.

Sincerely,

ROY ABBOUD, Acting Branch Chief
Local Development and Intergovernmental Review Branch

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710

Edmund G. Brown Jr., Governor

August 25, 2017

John O'Donnell
City of Santee
10601 Magnolia Avenue
Santee, CA 92071-1266

Sent via e-mail: jodonnell@cityofsanteeca.gov

RE: SCH# 2017081030; Sustainable Santee Plan Project, City of Santee; San Diego County, California

Dear Mr. O'Donnell:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws**.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
   a. A brief description of the project.
   b. The lead agency contact information.
   c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
   d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
   a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project's impacts on tribal cultural resources.
   d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
   a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
   b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
    a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
    b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.
        ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        i. Protecting the cultural character and integrity of the resource.
        ii. Protecting the traditional use of the resource.
        iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

    This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have been already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst

cc: State Clearinghouse

County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 694-2962 • Fax (858) 694-2555
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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

September 19, 2017

John O'Donnell
Principal Planner
Development Services Department
10601 Magnolia Avenue
Santee, CA 92071

Via e-mail: jodonnell@CityofSanteeCa.gov

RESPONSE TO COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE SUSTAINABLE SANTEE PLAN

Dear Mr. O'Donnell,

The County of San Diego (County) reviewed the City of Santee's (City) Notice of Preparation of a Draft Program Environmental Impact Report (PEIR) for the Sustainable Santee Plan dated August 15, 2017 (Project).

The County appreciates the opportunity to review the Project, and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

BIOLOGICAL RESOURCES

1. The draft Initial Study for the Project indicates that there could be potential significant impacts to biological resources as a result of implementation of energy production facilities. The Initial Study implies that an analysis will be conducted regarding potential impacts to Habitat Conservation Plans (HCPs) in accordance with CEQA Guidelines. The County agrees that an analysis should be completed to address these potential impacts.

2. The County has a Multiple Species Conservation Program (MSCP), which includes one adopted Plan covering the southern portion of the County (South County Plan). In addition, the County is currently working on preparing an MSCP Plan to cover the northern portion of the County (North County Plan), and will receive future direction on an MSCP Plan for the eastern portion of the County (East County Plan) once the North County Plan is significantly underway. The County requests that the City consider the existing South County Plan and preliminary draft North County Plan and preliminary draft map for the East County Study Area as part of the EIR analysis. Information regarding all three efforts is available on the County's website at the following address: http://www.sandiegocounty.gov/pds/mscp/.

3. As demonstrated in mapping for the South County Plan the eastern edge of the City is located adjacent to County lands that are included within the South County Plan. The County requests that potential impacts to adopted HCPs that could result from implementation of the proposed project specifically

wildlife corridors or other biological resources that may exist between County lands and lands within the City. Information regarding the South County Plan is available at the following address: http://www.sandiegocounty.gov/content/dam/sdc/pds/mscp/docs/mscp_areas.pdf.

TRANSPORTATION/TRAFFIC

1. The Project is intended to "provide policy direction and identify actions the City and community will take to significantly reduce the generation of greenhouse gas emissions (GHGs) consistent with California AB 32 and EO S-3-05". The City should implement the Mobility Element Mast Boulevard connection to the County segment to provide a direct path of travel for travelers. The connection will fulfill the intent of the Sustainability Plan to reduce emissions by providing a connection for bicycle and walk travel and by eliminating out of direction automobile travel caused by the current gap in the network.

WASTEWATER

1. Based on the information provided in the NOP, it appears there could potentially be an impact to District trunk sewer line. Because the Sustainability Plan includes the entire municipal boundary, the project scope traverses the District trunk sewer line (Attachment A). Once individual projects are proposed by the City, the District will need to conduct a site-specific and more thorough analysis to ensure the existing underground wastewater infrastructure is not impacted.

The County looks forward to receiving future documents and/or notices related to this Project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Timothy Vertino at 858-495-5468 or by e-mail at timothy.vertino@sdcounty.ca.gov.

Sincerely,

MARY KOPASKIE BROWN, AICP, MCIP
Chief, Advance Planning Division
Planning & Development Services

Attachments: Attachment A: Trunk Sewer Line Location Map

E-mail cc: Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Vincent Kattoula, CAO Staff Officer, LUEG
Crystal Benham, Land Use / Environmental Planner, PDS
Jeff Kashak, Environmental Planner, DPW
Everett Hauser, Transportation Specialist, PDS

401 B Street, Suite 800
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(619) 699-1900
Fax (619) 699-1905
sandag.org

September 14, 2017

File Number 3300300

Mr. John O'Donnell
Development Services Department
City of Santee
10601 Magnolia Avenue
Santee, CA 92071

Dear Mr. O'Donnell:

SUBJECT: Sustainable Santee Plan Notice of Preparation

Thank you for the opportunity to comment on the City of Santee's Sustainable Santee Plan Notice of Preparation (NOP). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (Regional Plan). These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG's comments are submitted from a regional perspective emphasizing the need for better land use and transportation coordination.

Smart Growth

SANDAG appreciates that the City of Santee has prioritized multimodal transportation, transit-oriented development, and land use changes that support the goals of the Smart Growth Concept Map and Regional Plan. Implementation of the Sustainable Santee Plan's goals and objectives will help facilitate more transportation options for current and future residents.

A key goal of the Regional Plan is to focus growth in smart growth opportunity areas. The City of Santee has four smart growth opportunity areas: An Existing/Planned Town Center (ST-1), a Potential Mixed-Use Transit Corridor (ST-2), and two Potential Community Centers (ST-3 and ST-4). The City of Santee should continue facilitating access to existing and future transit services in these areas.

Transportation Demand Management

Please consider incorporating transportation demand management (TDM) strategies into the City of Santee's Sustainable Santee Plan Program Environmental Impact Report (PEIR) to encourage the use of alternative travel modes that can assist with decreasing congestion and greenhouse gas emissions. Specific TDM strategies to consider include:

- Develop policies that encourage employers to offer TDM programs to their employees. The iCommute employer services program can work with local businesses to offer customized commuter benefit programs that promote transportation alternatives to employees.

- Encourage developers to incorporate TDM-supportive capital improvements into developments through the entitlement process.

- Consider implementing the mobility hub concept at high-frequency transit stations near major employer sites and commercial destinations to encourage commuters to use public transportation. Additional information on mobility hubs is available at SDForward.com/mobilityhubs.

- Promote the use of shared mobility services (e.g., vanpool, carpool, transit, and on-demand rideshare services) and incentivize rideshare options as an alternative to driving alone.

- Provide and promote the use of Park & Ride facilities.

- Develop a comprehensive parking management plan and consider parking management strategies that reduce parking demand and encourage the more efficient use of the existing parking supply. Parking management strategies could include shared parking, parking cash-out, and designated parking for high-occupancy vehicles and other shared mobility options at employment sites.

- Incorporate bike infrastructure and amenities into developments, including convenient and secure bike parking, as well as showers and lockers at employment sites and near transit.

Additionally, the City of Santee can partner with the SANDAG TDM program, iCommute, to take advantage of regional TDM programs and services. This includes the SANDAG Vanpool Program, online ridematching services, the Guaranteed Ride Home program, and bike encouragement programs (e.g., the GO by BIKE Mini-Grant program, the Walk, Ride, and Roll to School Mini-Grant and education program). Information on the SANDAG TDM program can be accessed through iCommuteSD.com.

Other Considerations

SANDAG has a number of additional resources that can be used for additional information or clarification on smart growth and TDM. These can be found on the SANDAG website at sandag.org/igr:

- SANDAG Regional Parking Management Toolbox

- Riding to 2050, the San Diego Regional Bike Plan

- Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in Environmental Impact Reports

- Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region

- Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities

- Trip Generation for Smart Growth

- Parking Strategies for Smart Growth

- Designing for Smart Growth, Creating Great Places in the San Diego Region

When available, please send any additional environmental documents related to this project to:

SANDAG
Attention: Intergovernmental Review
401 B Street, Suite 800
San Diego, CA 92101

We appreciate the opportunity to comment on the City of Santee's Sustainable Santee Plan NOP. If you have any questions, please contact me at (619) 699-1943 or at seth.litchney@sandag.org.

Sincerely,

SETH LITCHNEY
Senior Regional Planner

SLI/KHE/abar

October 2, 2017

John O'Donnell, Principal Planner
Development Services Department
City Hall, Building Four
10601 Magnolia Avenue
Santee, CA 92071

Subject: Comments on the Notice of Preparation of a Draft Program Environmental Impact Report (PEIR) for the proposed Sustainable Santee Plan

Dear Mr. O'Donnell:

Padre Dam Municipal Water District (District) has received your notice of preparation of a draft PEIR for the proposed Sustainable Santee Plan and appreciates an opportunity to provide comments. The District fully supports the goals and objectives of the Sustainable Santee Plan developed by the City to improve sustainability and reduce greenhouse gas emissions regionwide.

As the City is aware, the District is planning to implement the East County Advanced Water Program (ECAWP) to increase regional water supply reliability. It is the District's goal that the ECAWP Project ultimately produces up to 30 percent of East San Diego County's potable water supply by 2040. By providing a local source for potable water, the ECAWP Project would reduce reliance on imported water, thereby reducing GHG emissions associated with having to pump water from the Sacramento-San Joaquin Bay Delta in northern California or from the Colorado River for consumption.

Because of the potential for the ECAWP to reduce imported water use for the community and provide a local, sustainable, and drought-resilient source of potable water, it would be valuable to discuss the ECAWP in the Sustainable Santee Plan.

We look forward the opportunity to work collaboratively with the City of Santee to develop the Sustainable Santee Plan. Questions regarding this letter and further coordination on these issues should be directed to Albert C. Lau, P.E. Director of Engineering and Planning or Mark Niemiec, P.E., Engineering Manager.

PADRE DAM MUNICIPAL WATER DISTRICT

Albert C. Lau, P.E.
Director of Engineering and Planning

CALIFORNIA CHAPARRAL INSTITUTE
...the voice of the chaparral

CENTER for BIOLOGICAL DIVERSITY

Preserve Wild Santee

September 11, 2017

John O'Donnell, Principal Planner
Santee City Council
10601 Magnolia Avenue
Santee, CA 92071
jodonnell@cityofsanteeca.gov

RE: Scope of the EIR for the Santee Climate Action Plan – "Sustainability Plan"

Dear Mr. O'Donnell and Santee City Councilmembers,

The term "climate change" does not sufficiently describe the trending instability and breakdown of the earth's climatic life support systems caused primarily by fossil fuel consumption. The climate breakdown is resulting in extreme weather disasters for all species.

The environmental analysis should begin by discussing the current status of Greenhouse Gases (GHGs) in the atmosphere (including local, regional and global baseline emissions). This baseline analysis should be used to explain the significance of GHG growth projections and the ability to control feedback loops that exacerbate the pace of and ability to control climate breakdown that trends toward greater catastrophic weather extremes.

The relationship of Santee's Climate Action Plan (CAP) to the goal of achieving climate stability or deteriorating into a state of permanent climate breakdown (including the ramifications thereof) should be addressed to set the full context for the plan. The analysis should include a discussion of how in quantifiable terms, California mandated targets, if achieved, relate to the global actions required to reach climate stability.

Aggressive emergency actions are required now due to decades of failure to acknowledge and act upon the impacts of fossil fuel reliance and other human caused emissions that are now manifesting into extreme weather events and firestorms. GHG emissions trap greater solar energy that adds significant fuel into the weather systems that distribute the energy worldwide. Destructive events with vast human and economic costs are rapidly increasing in frequency and magnitude.

Current international agreements are insufficient to keep global warming under the 1.5° to 2°C target required to avoid severe impacts that include an unalterable reinforcing breakdown cycle. "2030 emissions will be 12 to 14 gigatonnes above levels needed to limit global warming to 2°C...The world must urgently and dramatically increase its ambition to cut roughly a further quarter off predicted 2030 global greenhouse emissions..."[1] Current policy results trend toward a catastrophic 3.5°C global temperature increase.

We must take more aggressive action locally and globally to eliminate the emissions reduction gap required to limit global warming to 1.5°C to 2°C.[2]

> "If we don't, we will mourn the loss of biodiversity and natural resources. We will regret the economic fallout. Most of all, we will grieve over the avoidable human tragedy; the growing numbers of climate refugees hit by hunger, poverty, illness and conflict will be a constant reminder of our failure to deliver." [3]

We would consider the Environmental Impact Report (EIR) to be inadequate without a thorough disclosure of this global and statewide context, including avoidance measures, which is the motivating factor for requiring effective climate stabilizing actions.

Alternative: Zero Net Emissions - Maximum Carbon Negative Plan

The GHG emission targets set by Executive Orders and Legislation in California (although important leadership measures) are themselves not enough to prevent catastrophic global climate change / climate instability. To generate the opportunity to meet warming targets in the Paris global climate agreement and to avoid even greater catastrophic impacts, a carbon negative plan will need to be implemented globally. Hence, local climate action plans must be aggressive innovative leaders in not only eliminating and avoiding GHG emissions, but in maximizing ways to store carbon. Leading by example is essential.

---

[1] UNEP Release. *World must urgently up action to cut a further 25% from predicted 2030 emissions*, November 3, 2016

[2] Vidal, John. *UN on wrong track with plans to limit global warming to 2°C, says top scientist*...James Hansen says current 'half arsed' plans to reduce emissions will lead to dangerous climate change... December 3, 2015.

[3] UNEP Synthesis Report Forward by Erik Solheim, Head of UN Environment and Jacqueline McGlade, UN Environment Chief Scientist. *The Emissions Gap Report 2016*, November 2016.

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Therefore, a "**Zero Net Emissions - Maximum Carbon Negative Plan Alternative**" should be prepared and adopted.[4]

On-site measures that avoid and reduce a project's GHG emissions to the extent feasible must be the priority prior to shifting to off-site mitigation measures. Closest proximity to the project site should the priority for any off-site measures adopted.

Methods for carbon capture and long-term storage should be analyzed. Potential measures include:

1. Restoration of native plant communities in city parks, preserves and private open spaces.
2. Urban tree programs that select species for longevity, drought resistance, mass and ability to diffuse heat islands (i.e., Quercus agrifolia).
3. Soil amendment and conservation for carbon storage.
4. Conversion of Sycamore Landfill waste capacity into permanent carbon storage as zero waste goals are achieved.
5. Conversion of undeveloped area parcel zoning into "Carbon Sequestration Open Space Zones", thereby avoiding GHG emissions while simultaneously providing potential carbon storage.
6. Providing civic space and support for local farmers markets within walking distance of most city neighborhoods, including access to reclaimed water and development of greywater systems to support yard scale agriculture and urban forests that store carbon.
7. Carbon storage of vegetation on undeveloped parcels should be calculated, including carbon stored below ground in root systems. Removal of the carbon stored and the long-term storage capacity should be considered in any new development project as a significant impact.
8. Completion of Santee's Multiple Species Conservation Program Subarea Plan with enhanced carbon storage components, such as the conservation of Fanita Ranch.
9. Favorable processing of redevelopment that replaces portions of parking lots with parking structures and reclaims the remaining paved area for civic functions on park like carbon storage landscapes.
10. Resurfacing of public transportation surfaces with solar energy generation mediums and earmarking the value of the energy produced to support carbon storage projects.
11. Replacement of artificial turf fields with well-maintained natural grass irrigated with reclaimed water.
12. Incentives to convert plastic grass into drought-tolerant or native species and limiting new artificial turf surfaces to 100 square feet per parcel.

---

[4] Roberts, David, *It's time to start talking about 'negative' carbon dioxide emissions*, Vox, August 18, 2017.

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Project Description

After undertaking the contextual analysis described in this letter's opening paragraph and after review of the CAPs within our region, the project goals should be reevaluated and adjusted to exceed the political targets established by the state to be more consistent with the real world situation of climate breakdown as documented by science.

What equivalence/relationship does the target of reducing city "community-wide GHG emissions to "15% below 2005 levels by 2020" have to the statewide mandate to reduce GHG emissions to 1990 levels by 2020? Similarly, what equivalence/relationship is "49% below 2005 levels by 2035" to 80% below 1990 levels by 2050? What equivalence/relationship do the statewide targets have to the reductions required to reach climate stabilization?

Substantial evidence needs to be included that explains the data set for the emission baseline year chosen and the corresponding percent of reduction target. The interim target deadline of 2035 should be modified to 2030 (with percentage of reductions adjusted according to evidence) to remain consistent with the state target year of 2030. Margins of error should be revealed for the years that emission data has been calculated in Santee. What evidence suggests that 2005 is the most accurate data set or otherwise most appropriate for use as the baseline? The most accurate data set year should be selected for the baseline, which is likely a more recent set.

Measures adopted to meet emission reduction targets must be quantifiable, enforceable and demonstrate substantial evidence they will be implemented effectively. Funding mechanisms, responsible parties, anticipated levels of emission reductions and clear timelines should be identified. Progress should be monitored constantly and annual reports should be prepared and presented to the public. GHG inventories should be updated at a minimum, every 3 years. The CAP should be updated periodically with the first update set for 2025 and at a minimum a new update every 5 years thereafter.

As a result of fossil fuel emissions, we are on the cusp of perpetual catastrophic climatic breakdown regionally and worldwide. Recognizing this inescapable reality, Governor Brown's Executive Order B-30-15 requires greenhouse gas emissions to be 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050. Governor Brown also signed into law SB 350 that requires by 2030, widespread electrification of the transportation sector, half of all power generated to be from renewable sources, and a doubling of energy efficiency in buildings.

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To reach these targets, local jurisdictions must act aggressively with their land use decisions. Within this context, we request that Santee prepare a Climate Action Plan (CAP) with aggressive quantifiable and enforceable measures to exceed state mandated emission targets.

Suggested Climate Goals for Santee:
- 100% Clean Renewable Power Consumption by 2030
- 75% Electrification of the entire local Transportation sector by 2030
- 50% Less Power Consumed in Public and Government Structures by 2030
- 35% Urban Forest Canopy by 2030 to reduce heat islands and store carbon
- Zero Waste by 2030 and increased Water Conservation Targets.
- Reduced Vehicle Miles Traveled (increased use of alternatives by adopting policy that favors transit, walking and biking with specified share targets)
- No discretionary approvals of residential developments that are more than ½ mile from an existing mode of public transit.
- Zero Net Emissions / Carbon Negative by 2050
- Social justice implemented as a component of climate investments
- Update of the General Plan with supporting ordinances to incorporate these adopted climate goals

Implementation

Santee must develop an efficient means to implement, monitor (with specific timelines and requirements to remedy insufficient progress) and enforce actions intended to meet the GHG reduction levels established by climate goals.

Therefore, GHG reduction measures considered for inclusion should be quantified with specific expected reduction levels and estimated cost ranges. These estimates should be verified following implementation through monitoring and reporting made available to the public. Only then can informed comparisons and decisions be made about adoption of specific actions. It is important to know Santee's 1990 level of emissions, subsequent emissions data and what current emissions levels are so that a realistic strategy can be designed to meet and exceed mandated levels.

Santee's ordinances should also be revised to effectively implement planned GHG reductions. All of the above may be important toward receiving competitive grants that may become available to support implementation of Climate Action Plans.

Driving Innovation and Efficiency with Community Choice Energy

An essential element of Santee's CAP should be formation of Santee's own Community Choice Aggregation (CCA) or joining in a regional CCA as an effective means to reach the 100% clean power target.

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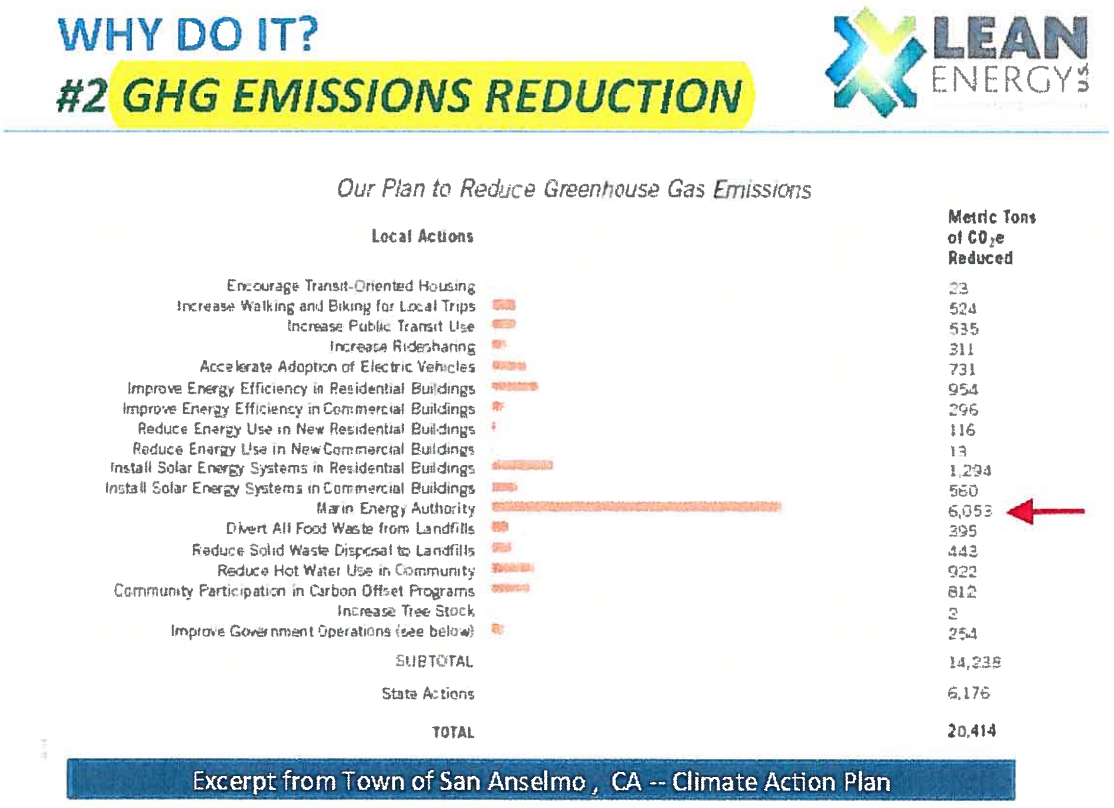
CCA's are proven to provide cleaner power at lower rates than Investor Owned Utilities (IOUs). CCA is the single most effective tool available to reduce GHG emissions due to the ability to utilize competitive market forces. **CCA can be the revenue source to seed the CAP.**

The Lean Energy GHG Reduction chart below demonstrates how the GHG reductions from Marin Energy Authority CCA dwarf any other single reduction measure. CCA provides 30% of San Anselmo CAP's total GHG reductions (6,053 of 30,414 Metric Tons CO2e reduced).

To recognize the dramatic potential of CCA, a dual point total structure for CEQA streamlining of projects should be prepared. An initial high point total should be required for initial streamlining, which could be gradually reduced as CCA actions resulting in GHG reductions are realized and tabulated.



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GHG Reduction Measure Recommendations

- Form a CCA
- Require PV solar on all new commercial and residential structures
- Require new residential buildings to be net-zero energy buildings
- Require new commercial buildings to be energy positive buildings
- Require new parking lots to be covered with PV solar
- Require Electrical Vehicle Chargers in new commercial centers
- Promote Neighborhood and other Electric Vehicles considered to be 70% more energy efficient than vehicles with combustion engines
- Expand Bike Routes
- Remove barriers to alternative transportation
- Develop and Implement an Urban Forest Management Plan
- Conserve additional Natural Open Space within the City

The above and the other options provided by staff should be quantified for comparison and prioritization purposes.

Climate Disaster Resilience, Adaptation and Contingency Measures

A geographic analysis of current city land uses with projections for vulnerability to extreme weather events should be developed that includes potential measures to resist or rebound from such events.

For instance, areas of the city vary by dates and standards of construction and are sited in locations that may be more vulnerable to extreme flood and fire events. Analysis should discuss strategies to bolster vulnerable buildings/locations and determine options for higher standards of reconstruction or abandonment of higher risk locations.

It may be prudent for the City to build up a disaster relief fund that could be used to initiate rebuilding of vital infrastructure damaged by severe events. Options for funding disaster relief and other climate stabilization initiatives should be considered.

Conclusion

Effective measures that will transition us away from fossil fuel emissions and remove carbon from the atmosphere are critical steps toward achieving climate stability and are long overdue. Adoption of an effective CAP is crucial to our collective well-being.

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Preserve Wild Santee

Thank you for considering these comments.
/s/

Van K. Collinsworth
Director, Preserve Wild Santee
Conservation Coordinator, California Chaparral Institute

John Buse, Senior Counsel
Center for Biological Diversity

Duncan McFetridge
Save Our Forests & Ranchlands
Cleveland National Forest Foundation

Sophie Wolfram
Climate Action Campaign

Frank Landis
California Native Plant Society San Diego

Dan Silver
Endangered Habitats League

Laura Hunter
Escondido Neighbors United

Pamela Heatherington
Environmental Center of San Diego

April Rose Maurath Sommer
Protect Our Communities Foundation

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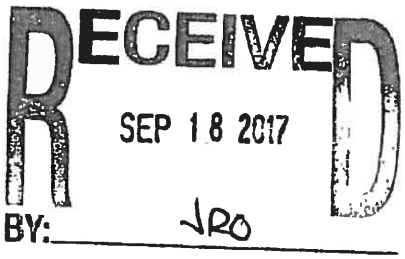
Preserve Wild Santee

John O'Donnell

From: Jim Clark <ipodjlc@gmail.com>
Sent: Monday, September 18, 2017 5:17 PM
To: John O'Donnell
Subject: Climate action plan



Mr. O'Donnell:

I recently reviewed the article in the UT regarding the proposals to bring Santee into compliance with State ordered climate regulations. Although in general the proposals seem reasonable, I disagree with the proposal to reduce travel by car and to increase bike paths. Much of , if not the greater proportion of, car travel through Santee, is pass through traffic by people headed to Lakeside and beyond and El Cajon. Many people come from outside Santee to shop, eat and enjoy the park and sports facilities. These people will not be coming in with bicycles no matter how many bike lanes are added. As an example of the ineffective addition of bike lanes is the stretch between Carlton Hills and West on Carlton Oaks. I traveled that route for many years going to highway 52 and after the bike lane was expanded traffic became more congested and over the course of several years never saw more than a paltry few cyclists.

It is unreasonable to attempt to social engineer the behavior of drivers who need to travel great distances by adding bike lanes that will further congest traffic in the interest of a very limited number of bike riders. The idea may academically soothing but in a common sense reality, is an unrealistic approach to met the States unrealistic goals.

Thank you for your consideration.

Jim Clark

APPENDIX B

SUSTAINABLE SANTEE ACTION PLAN:

The City's Roadmap to Greenhouse Gas Reductions

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APPENDIX C

AIR QUALITY MEMORANDUM

MEMORANDUM

DATE: February 22, 2019

TO: City of Santee

FROM: LSA Associates, Inc.

SUBJECT: Air Quality Analysis for Sustainable Santee Plan

This Air Quality Analysis memo has been prepared to evaluate the potential air quality impacts associated with the proposed Sustainable Santee Plan (Plan) in the City of Santee (City), San Diego County (County), California. This report provides a project-specific Air Quality Analysis by examining the impacts of the proposed Plan on the regional air quality. Guidelines identified by the County in its *Guidelines for Determining Significance and Report Format and Content Requirements – Air Quality* (County of San Diego 2007) were followed in this memo.

Project Description

The City is committed to providing a more livable, equitable, and economically vibrant community through the incorporation of energy efficiency features and reduction of greenhouse gas (GHG) emissions. By using energy more efficiently, the City will keep dollars in the local economy, create jobs, and improve the community's quality of life. These efforts toward reducing GHG emission must be done in coordination with the City's land use decisions. The foundation of planning land use decisions is found in the General Plan policies and programs.

The General Plan addresses a number of different resources within the City that must be managed properly. Among these resources are water and air quality. Goals within the Land Use and Conservations Elements specifically speak to water conservation and air quality. In order to implement this goal, to provide a more livable, equitable and economically vibrant community, and preserve the attributes of its unique valley location and quality lifestyle, the City has committed to prepare and implement the Sustainability Plan. The Sustainability Plan would ensure that the impact of future development projects on air quality is minimized, water conserved, and that decisions made by the City and all internal operations within the City are consistent with adopted state legislation.

The Plan was designed under the premise that the City and the community it represents are uniquely capable of addressing emissions associated with sources under the City's jurisdiction. The

City's emission reduction efforts should coordinate with the state strategies in order to accomplish emission reductions in an efficient and cost-effective manner.

The proposed Plan includes a baseline GHG emissions inventory and recommendations for GHG reduction strategies as a foundation for these efforts. An indicator of the success of these efforts will be a measured reduction in GHG emissions using the measures in the Plan. The Plan is another implementation tool of the General Plan that can be used to guide development in the City by focusing on attaining the various goals and policies of the General Plan as well as the GHG reduction goals.

The Plan achieves the purpose and goals described above by providing: an analysis of GHG emissions and sources attributable to the City; estimates on how those emissions are expected to increase; recommended policies and actions that can reduce GHG emissions to meet state, federal, and international targets.

Regional Air Quality Regulations and Standards

The SDAPCD is the local agency responsible for the administration and enforcement of air quality regulations for the San Diego Air Basin (SDAB), which includes all of San Diego County. The SDAPCD regulates most air pollutant sources, except for motor vehicles, marine vessels, aircraft, and agricultural equipment, which are regulated by the California Air Resources Board (ARB) or Environmental Protection Agency (EPA). State and local government projects, as well as projects proposed by the private sector, are subject to SDAPCD requirements if the sources are regulated by the SDAPCD. Additionally, the SDAPCD, along with the ARB, maintains and operates ambient air quality monitoring stations at numerous locations throughout San Diego County. These stations are used to measure and monitor ambient criteria and toxic air pollutant levels.

The San Diego Association of Governments (SANDAG) is the San Diego region's primary public planning, transportation, and research agency, providing the public forum for regional policy decisions about growth, transportation planning and construction, environmental management, housing, open space, energy, public safety, and binational topics. The SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the Ambient Air Quality Standards (AAQS) in the SDAB. The San Diego County RAQS were initially adopted in 1991, and are updated on a triennial basis. The Regional Air Quality Strategy (RAQS) were updated in 1995, 1998, 2001, 2004, 2009, and most recently in December 2016 (County of San Diego 2016). The RAQS outline the SDAPCD's plans and control measures designed to attain the State air quality standards for O_3. The SDAPCD has also developed the SDAB's input to the State Implementation Plan (SIP), which is required under the Clean Air Act (CAA) for pollutants that are designated as being in nonattainment for national air quality standards for the SDAB.

The RAQS rely on information from the ARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then establish the strategies necessary for the reduction of emissions through regulatory controls. The ARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the

County as part of the development of their general plans. As such, projects that propose development consistent with the growth anticipated by the general plans would be consistent with the RAQS. In the event that a project would propose development that is less dense than anticipated within the general plan, the project would likewise be consistent with the RAQS. If the project proposes development that is greater than that anticipated in the general plan and SANDAG's growth projections, the project might be in conflict with the RAQS and SIP, and might have a potentially significant impact related to air quality.

The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the SDAB. The SIP also includes rules and regulations that have been adopted by the SDAPCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and, thereby, hinder attainment of the National Ambient Air Quality Standards (NAAQS) for O_3.

In addition to RAQS and SIP, the SDAPCD adopted the *Measures to Reduce Particulate Matter in San Diego County* report in December 2005 (County of San Diego 2005). This report is based on particulate matter reduction measures adopted by the ARB. The SDAPCD evaluated the ARB's list of measures and found the majority were already being implemented in the County. As a result of the evaluation, the SDAPCD proposed measures for further evaluation to reduce particulate matter emissions from residential wood combustion and from fugitive dust from construction sites and unpaved roads.

Short-Term Construction Air Quality Impacts

Implementation of the Plan could result in construction of energy-generating facilities such as photovoltaic/solar arrays or installation of cool roofs that would primarily be installed on rooftops of new or existing buildings. It could also result in energy-efficiency retrofits in existing residential, commercial, and municipal buildings throughout the City. However, details of the potential construction activities are unknown yet. Each individual construction activity associated with future development projects will need to comply with the California Environmental Quality Act (CEQA). Therefore, no significant impact would occur as a result of the Plan.

Long-Term Operational Air Quality Impacts

Long-term air pollutant emission impacts are those associated with stationary sources and mobile sources involving any Plan-related changes. The citywide energy usage (including electricity and natural gas) and vehicle miles traveled (VMT) data were obtained from the Plan and entered in CalEEMod under User Defined Industrial land use of one unit size. The countywide off-road emissions were calculated from OFFROAD2007 model and proportioned to citywide emissions based on relevant indicator data, as described in the Plan. Table A presents a summary of the peak daily emissions for the Plan baseline year 2005, forecast year 2035, and changes in emissions between baseline year and forecast years. The CalEEMod and OFFROAD2007 model outputs and calculations are provided in Attachment A.

Table A shows that the Plan would decrease all criteria air pollutants emissions from baseline and thus would not exceed the corresponding SDAPCD daily emission thresholds for any criteria pollutants. Therefore, Plan-related long-term air quality impacts would be less than significant.

Table A: Regional Operational Emissions

Source	Pollutant Emissions, lbs/day					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing Land Use Emissions						
Energy	21.6	195.9	164.6	1.2	14.9	14.9
Mobile	1,278.3	3,711.0	6,974.2	12.9	764.1	215.0
Off-Road	729.4	2220.8	5293.5	18.3	145.0	-[1]
Total Existing Emissions	**2,029.3**	**6,127.8**	**12,432.4**	**32.4**	**924.0**	**229.9**
General Plan Emissions (2035)						
Energy	18.4	167.5	140.7	1.0	12.7	12.7
Mobile	965.5	4,638.5	5,569.5	16.3	1,329.6	361.9
Off-Road	605.8	283.6	5501.7	6.4	23.1	-[1]
Total General Plan (2035) Emissions	**1,680.1**	**5,140.7**	**11,712.7**	**25.3**	**1,370.6**	**379.7**
Changes in Emissions with the Sustainable Santee Action Plan (2035)						
Energy	-8.05	-73.17	-61.46	-0.44	-5.56	-5.56
Mobile	-343.66	-1,651.11	-1,982.51	-5.81	-473.28	-128.83
Off-Road	0.00	0.00	0.00	0.00	0.00	—[1]
Changes to Emissions Totals	**-351.71**	**-1,724.28**	**-2,043.97**	**-6.25**	**-478.84**	**-134.40**
SDAPCD Thresholds	**75.0**	**250.0**	**550.0**	**250.0**	**100.0**	**55.0**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (December 2018).
Note: [1] Assume all particulate matter emissions from off-road equipment are PM_{10}.
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides

Air Quality Management Plan Consistency

The applicable air quality plans are the SIP and RAQS. As discussed above, the SIP includes strategies and tactics to be used to attain and maintain acceptable air quality in the SDAB. The RAQS is a separate document that contains a list of strategies to maintain acceptable air quality. Consistency with the RAQS is typically determined by two standards. The first standard is whether the proposed project would exceed assumptions contained in the RAQS. The second standard is whether the proposed project would increase the frequency or severity of existing air quality violations, contribute to new violations, or delay the timely attainment of air quality standards or interim reductions as specified in the RAQS.

The RAQS and SIP are intended to address cumulative impacts in the SDAB based on future growth predicted by SANDAG in the 2030 Regional Growth Forecast Update. SANDAG uses growth projections from the local jurisdictions' adopted General Plans; therefore, development consistent with the applicable General Plan would be generally consistent with the growth projections in the air quality plans.

The proposed Plan would reduce regional criteria air pollutants emissions and is not expected to result in any long-term regional air quality impacts. Therefore, the project will not conflict with the RAQS or SIP, and no significant impact will result with respect to implementation of the air quality plan. The proposed Plan is an implementation tool of the City's General Plan and does not change the population, and thus is considered to be within the SANDAG growth projections. Therefore, the proposed Plan is consistent with the SIP and RAQS.

References

County of San Diego, *Guidelines for Determining Significance and Report Format and Content Requirements: Air Quality*, March 2007.

County of San Diego, *2016 Revision of the Regional Air Quality Strategy for San Diego County*, December 2016.

County of San Diego, *Measures to Reduce Particulate Matter in San Diego County,* December 2005.

LSA Associates, *Sustainability Santee Plan*, February 2019.

ATTACHMENT A: CALEEMOD PRINTOUTS AND OFF-ROAD EMISSIONS CALCULATIONS

Santee CAP Baseline 2005

San Diego County APCD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1.00	User Defined Unit	1.00	1.00	1

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	13			**Operational Year**	2019
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	720.49	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - City of Santee

Construction Phase - no construction

Off-road Equipment -

Vehicle Trips - 165,566,539 VMT annually

Energy Use - residential + commercial energy usage

Water And Wastewater - assume indoor/outdoor half-half

Solid Waste - community solid waste generation

Mobile Land Use Mitigation -

Off-road Equipment -

Table Name	Column Name	Default Value	New Value

tblEnergyUse	NT24E	0.00	250,015,672.00
tblEnergyUse	NT24NG	0.00	729,633,485.00
tblLandUse	BuildingSpaceSquareFeet	0.00	1.00
tblLandUse	LandUseSquareFeet	0.00	1.00
tblLandUse	LotAcreage	0.00	1.00
tblLandUse	Population	0.00	1.00
tblProjectCharacteristics	OperationalYear	2018	2019
tblSolidWaste	LandfillNoGasCapture	6.00	100.00
tblSolidWaste	SolidWasteGenerationRate	0.00	68,961.00
tblVehicleTrips	CC_TL	7.30	1.00
tblVehicleTrips	CC_TTP	0.00	33.00
tblVehicleTrips	CNW_TL	7.30	1.00
tblVehicleTrips	CNW_TTP	0.00	34.00
tblVehicleTrips	CW_TL	9.50	1.00
tblVehicleTrips	CW_TTP	0.00	33.00
tblVehicleTrips	PR_TP	0.00	100.00
tblVehicleTrips	ST_TR	0.00	454,853.13
tblVehicleTrips	SU_TR	0.00	454,853.13
tblVehicleTrips	WD_TR	0.00	454,853.13
tblWater	IndoorWaterUseRate	0.00	1,098,500.00
tblWater	OutdoorWaterUseRate	0.00	1,098,500.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					

2017	0.0000	0.0000	0.0000	0.0000	0.0000	1.0455	0.0000	0.0000	0.9619	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**1.0455**	**0.0000**	**0.0000**	**0.9619**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	1.0455	0.0000	0.0000	0.9619	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**1.0455**	**0.0000**	**0.0000**	**0.9619**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	21.5578	195.9800	164.6232	1.1759		14.8945	14.8945		14.8945	14.8945		235,175.9823	235,175.9823	4.5075	4.3116	236,573.5156
Mobile	600.0460	1,741.9980	3,273.7822	6.0391	351.1443	7.5462	358.6905	93.8671	7.0712	100.9383		614,620.3199	614,620.3199	55.2434		616,001.4037

Total	**621.6038**	**1,937.9780**	**3,438.4055**	**7.2149**	**351.1443**	**22.4407**	**373.5849**	**93.8671**	**21.9657**	**115.8327**		**849,796.3024**	**849,796.3024**	**59.7509**	**4.3116**	**852,574.9195**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	21.5578	195.9800	164.6232	1.1759		14.8945	14.8945		14.8945	14.8945		235,175.9823	235,175.9823	4.5075	4.3116	236,573.5156
Mobile	600.0460	1,741.9980	3,273.7822	6.0391	351.1443	7.5462	358.6905	93.8671	7.0712	100.9383		614,620.3199	614,620.3199	55.2434		616,001.4037
Total	**621.6038**	**1,937.9780**	**3,438.4055**	**7.2149**	**351.1443**	**22.4407**	**373.5849**	**93.8671**	**21.9657**	**115.8327**		**849,796.3024**	**849,796.3024**	**59.7509**	**4.3116**	**852,574.9195**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	11/2/2017	11/1/2017	5	1	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	600.0460	1,741.9980	3,273.7822	6.0391	351.1443	7.5462	358.6905	93.8671	7.0712	100.9383		614,620.3199	614,620.3199	55.2434		616,001.4037
Unmitigated	600.0460	1,741.9980	3,273.7822	6.0391	351.1443	7.5462	358.6905	93.8671	7.0712	100.9383		614,620.3199	614,620.3199	55.2434		616,001.4037

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	454,853.13	454,853.13	454853.13	165,566,539	165,566,539
Total	454,853.13	454,853.13	454,853.13	165,566,539	165,566,539

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	1.00	1.00	1.00	33.00	33.00	34.00	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.581689	0.044135	0.186694	0.113515	0.018244	0.005600	0.015197	0.022573	0.001888	0.002088	0.006279	0.000742	0.001357

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	21.5578	195.9800	164.6232	1.1759		14.8945	14.8945		14.8945	14.8945		235,175.9823	235,175.9823	4.5075	4.3116	236,573.5156
NaturalGas Unmitigated	21.5578	195.9800	164.6232	1.1759		14.8945	14.8945		14.8945	14.8945		235,175.9823	235,175.9823	4.5075	4.3116	236,573.5156

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	1.999e+006	21.5578	195.9800	164.6232	1.1759		14.8945	14.8945		14.8945	14.8945		235,175.9823	235,175.9823	4.5075	4.3116	236,573.5156
Total		**21.5578**	**195.9800**	**164.6232**	**1.1759**		**14.8945**	**14.8945**		**14.8945**	**14.8945**		**235,175.9823**	**235,175.9823**	**4.5075**	**4.3116**	**236,573.5156**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	1999	21.5578	195.9800	164.6232	1.1759		14.8945	14.8945		14.8945	14.8945		235,175.9823	235,175.9823	4.5075	4.3116	236,573.5156
Total		**21.5578**	**195.9800**	**164.6232**	**1.1759**		**14.8945**	**14.8945**		**14.8945**	**14.8945**		**235,175.9823**	**235,175.9823**	**4.5075**	**4.3116**	**236,573.5156**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Unmitigated	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000

Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	**4.0000e-005**	**0.0000**	**1.0000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**2.2000e-004**	**2.2000e-004**	**0.0000**		**2.3000e-004**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	**4.0000e-005**	**0.0000**	**1.0000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**2.2000e-004**	**2.2000e-004**	**0.0000**		**2.3000e-004**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Santee CAP 2030

San Diego County APCD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1.00	User Defined Unit	1.00	1.00	1

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	13			**Operational Year**	2030
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	720.49	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - City of Santee

Construction Phase - no construction

Off-road Equipment -

Vehicle Trips - 155,502,699 VMT annually

Energy Use - residential + commercial energy usage

Water And Wastewater - assume indoor/outdoor half-half

Solid Waste - community solid waste generation

Mobile Land Use Mitigation -

Off-road Equipment -

Table Name	Column Name	Default Value	New Value

tblEnergyUse	NT24E	0.00	174,831,465.00
tblEnergyUse	NT24NG	0.00	623,658,742.00
tblLandUse	BuildingSpaceSquareFeet	0.00	1.00
tblLandUse	LandUseSquareFeet	0.00	1.00
tblLandUse	LotAcreage	0.00	1.00
tblLandUse	Population	0.00	1.00
tblProjectCharacteristics	OperationalYear	2018	2019
tblSolidWaste	LandfillNoGasCapture	6.00	100.00
tblSolidWaste	SolidWasteGenerationRate	0.00	27,685.00
tblVehicleTrips	CC_TL	7.30	1.00
tblVehicleTrips	CC_TTP	0.00	33.00
tblVehicleTrips	CNW_TL	7.30	1.00
tblVehicleTrips	CNW_TTP	0.00	34.00
tblVehicleTrips	CW_TL	9.50	1.00
tblVehicleTrips	CW_TTP	0.00	33.00
tblVehicleTrips	PR_TP	0.00	100.00
tblVehicleTrips	ST_TR	0.00	427,205.22
tblVehicleTrips	SU_TR	0.00	427,205.22
tblVehicleTrips	WD_TR	0.00	427,205.22
tblWater	IndoorWaterUseRate	0.00	573,128.00
tblWater	OutdoorWaterUseRate	0.00	573,129.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					

2017	0.0000	0.0000	0.0000	0.0000	0.0000	1.0455	0.0000	0.0000	0.9619	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**1.0455**	**0.0000**	**0.0000**	**0.9619**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	1.0455	0.0000	0.0000	0.9619	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**1.0455**	**0.0000**	**0.0000**	**0.9619**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	18.4267	167.5151	140.7127	1.0051		12.7312	12.7312		12.7312	12.7312		201,018.1280	201,018.1280	3.8529	3.6853	202,212.6782
Mobile	563.5726	1,636.1120	3,074.7878	5.6720	329.8002	7.0875	336.8877	88.1614	6.6414	94.8028		577,261.0798	577,261.0798	51.8854		578,558.2155

Total	**581.9993**	**1,803.6271**	**3,215.5006**	**6.6771**	**329.8002**	**19.8187**	**349.6189**	**88.1614**	**19.3725**	**107.5340**		**778,279.2080**	**778,279.2080**	**55.7383**	**3.6853**	**780,770.8939**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	18.4267	167.5151	140.7127	1.0051		12.7312	12.7312		12.7312	12.7312		201,018.1280	201,018.1280	3.8529	3.6853	202,212.6782
Mobile	563.5726	1,636.1120	3,074.7878	5.6720	329.8002	7.0875	336.8877	88.1614	6.6414	94.8028		577,261.0798	577,261.0798	51.8854		578,558.2155
Total	**581.9993**	**1,803.6271**	**3,215.5006**	**6.6771**	**329.8002**	**19.8187**	**349.6189**	**88.1614**	**19.3725**	**107.5340**		**778,279.2080**	**778,279.2080**	**55.7383**	**3.6853**	**780,770.8939**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	11/2/2017	11/1/2017	5	1	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	563.5726	1,636.1120	3,074.7878	5.6720	329.8002	7.0875	336.8877	88.1614	6.6414	94.8028		577,261.0798	577,261.0798	51.8854		578,558.2155
Unmitigated	563.5726	1,636.1120	3,074.7878	5.6720	329.8002	7.0875	336.8877	88.1614	6.6414	94.8028		577,261.0798	577,261.0798	51.8854		578,558.2155

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	427,205.22	427,205.22	427205.22	155,502,700	155,502,700
Total	427,205.22	427,205.22	427,205.22	155,502,700	155,502,700

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	1.00	1.00	1.00	33.00	33.00	34.00	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.581689	0.044135	0.186694	0.113515	0.018244	0.005600	0.015197	0.022573	0.001888	0.002088	0.006279	0.000742	0.001357

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	18.4267	167.5151	140.7127	1.0051		12.7312	12.7312		12.7312	12.7312		201,018.1280	201,018.1280	3.8529	3.6853	202,212.6782
NaturalGas Unmitigated	18.4267	167.5151	140.7127	1.0051		12.7312	12.7312		12.7312	12.7312		201,018.1280	201,018.1280	3.8529	3.6853	202,212.6782

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	1.70865e+006	18.4267	167.5151	140.7127	1.0051		12.7312	12.7312		12.7312	12.7312		201,018.1280	201,018.1280	3.8529	3.6853	202,212.6782
Total		**18.4267**	**167.5151**	**140.7127**	**1.0051**		**12.7312**	**12.7312**		**12.7312**	**12.7312**		**201,018.1280**	**201,018.1280**	**3.8529**	**3.6853**	**202,212.6782**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	1708.65	18.4267	167.5151	140.7127	1.0051		12.7312	12.7312		12.7312	12.7312		201,018.1280	201,018.1280	3.8529	3.6853	202,212.6782
Total		**18.4267**	**167.5151**	**140.7127**	**1.0051**		**12.7312**	**12.7312**		**12.7312**	**12.7312**		**201,018.1280**	**201,018.1280**	**3.8529**	**3.6853**	**202,212.6782**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Unmitigated	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000

Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	**4.0000e-005**	**0.0000**	**1.0000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**2.2000e-004**	**2.2000e-004**	**0.0000**		**2.3000e-004**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	**4.0000e-005**	**0.0000**	**1.0000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**2.2000e-004**	**2.2000e-004**	**0.0000**		**2.3000e-004**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Santee CAP 2035

San Diego County APCD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1.00	User Defined Unit	1.00	1.00	1

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	13			**Operational Year**	2035
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	720.49	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - City of Santee

Construction Phase - no construction

Off-road Equipment -

Vehicle Trips - 156,700,992 VMT annually

Energy Use - residential + commercial energy usage

Water And Wastewater - assume indoor/outdoor half-half

Solid Waste - community solid waste generation

Mobile Land Use Mitigation -

Off-road Equipment -

Table Name	Column Name	Default Value	New Value

tblEnergyUse	NT24E	0.00	151,385,069.00
tblEnergyUse	NT24NG	0.00	598,425,989.00
tblLandUse	BuildingSpaceSquareFeet	0.00	1.00
tblLandUse	LandUseSquareFeet	0.00	1.00
tblLandUse	LotAcreage	0.00	1.00
tblLandUse	Population	0.00	1.00
tblProjectCharacteristics	OperationalYear	2018	2019
tblSolidWaste	LandfillNoGasCapture	6.00	100.00
tblSolidWaste	SolidWasteGenerationRate	0.00	20,911.00
tblVehicleTrips	CC_TL	7.30	1.00
tblVehicleTrips	CC_TTP	0.00	33.00
tblVehicleTrips	CNW_TL	7.30	1.00
tblVehicleTrips	CNW_TTP	0.00	34.00
tblVehicleTrips	CW_TL	9.50	1.00
tblVehicleTrips	CW_TTP	0.00	33.00
tblVehicleTrips	PR_TP	0.00	100.00
tblVehicleTrips	ST_TR	0.00	430,497.23
tblVehicleTrips	SU_TR	0.00	430,497.23
tblVehicleTrips	WD_TR	0.00	430,497.23
tblWater	IndoorWaterUseRate	0.00	454,176.51
tblWater	OutdoorWaterUseRate	0.00	454,176.51

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					

2017	0.0000	0.0000	0.0000	0.0000	0.0000	1.0455	0.0000	0.0000	0.9619	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**1.0455**	**0.0000**	**0.0000**	**0.9619**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2017	0.0000	0.0000	0.0000	0.0000	0.0000	1.0455	0.0000	0.0000	0.9619	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**1.0455**	**0.0000**	**0.0000**	**0.9619**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	17.6811	160.7376	135.0196	0.9644		12.2161	12.2161		12.2161	12.2161		192,885.0891	192,885.0891	3.6970	3.5362	194,031.3088
Mobile	567.9154	1,648.7197	3,098.4819	5.7157	332.3416	7.1421	339.4838	88.8408	6.6926	95.5334		581,709.4085	581,709.4085	52.2853		583,016.5398

Total	**585.5966**	**1,809.4573**	**3,233.5015**	**6.6801**	**332.3416**	**19.3582**	**351.6998**	**88.8408**	**18.9086**	**107.7494**		**774,594.4979**	**774,594.4979**	**55.9822**	**3.5362**	**777,047.8488**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	17.6811	160.7376	135.0196	0.9644		12.2161	12.2161		12.2161	12.2161		192,885.0891	192,885.0891	3.6970	3.5362	194,031.3088
Mobile	567.9154	1,648.7197	3,098.4819	5.7157	332.3416	7.1421	339.4838	88.8408	6.6926	95.5334		581,709.4085	581,709.4085	52.2853		583,016.5398
Total	**585.5966**	**1,809.4573**	**3,233.5015**	**6.6801**	**332.3416**	**19.3582**	**351.6998**	**88.8408**	**18.9086**	**107.7494**		**774,594.4979**	**774,594.4979**	**55.9822**	**3.5362**	**777,047.8488**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	11/2/2017	11/1/2017	5	1	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	567.9154	1,648.7197	3,098.4819	5.7157	332.3416	7.1421	339.4838	88.8408	6.6926	95.5334		581,709.4085	581,709.4085	52.2853		583,016.5398
Unmitigated	567.9154	1,648.7197	3,098.4819	5.7157	332.3416	7.1421	339.4838	88.8408	6.6926	95.5334		581,709.4085	581,709.4085	52.2853		583,016.5398

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	430,497.23	430,497.23	430497.23	156,700,992	156,700,992
Total	430,497.23	430,497.23	430,497.23	156,700,992	156,700,992

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	1.00	1.00	1.00	33.00	33.00	34.00	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.581689	0.044135	0.186694	0.113515	0.018244	0.005600	0.015197	0.022573	0.001888	0.002088	0.006279	0.000742	0.001357

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	17.6811	160.7376	135.0196	0.9644		12.2161	12.2161		12.2161	12.2161		192,885.0891	192,885.0891	3.6970	3.5362	194,031.3088
NaturalGas Unmitigated	17.6811	160.7376	135.0196	0.9644		12.2161	12.2161		12.2161	12.2161		192,885.0891	192,885.0891	3.6970	3.5362	194,031.3088

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	1.63952e+006	17.6811	160.7376	135.0196	0.9644		12.2161	12.2161		12.2161	12.2161		192,885.0891	192,885.0891	3.6970	3.5362	194,031.3088
Total		**17.6811**	**160.7376**	**135.0196**	**0.9644**		**12.2161**	**12.2161**		**12.2161**	**12.2161**		**192,885.0891**	**192,885.0891**	**3.6970**	**3.5362**	**194,031.3088**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	1639.52	17.6811	160.7376	135.0196	0.9644		12.2161	12.2161		12.2161	12.2161		192,885.0891	192,885.0891	3.6970	3.5362	194,031.3088
Total		**17.6811**	**160.7376**	**135.0196**	**0.9644**		**12.2161**	**12.2161**		**12.2161**	**12.2161**		**192,885.0891**	**192,885.0891**	**3.6970**	**3.5362**	**194,031.3088**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Unmitigated	4.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000

Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	**4.0000e-005**	**0.0000**	**1.0000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**2.2000e-004**	**2.2000e-004**	**0.0000**		**2.3000e-004**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.0000e-005					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	**4.0000e-005**	**0.0000**	**1.0000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**2.2000e-004**	**2.2000e-004**	**0.0000**		**2.3000e-004**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Off-Road Emissions Calculation

	2005				
Row Labels	**Sum of ROG Exhaust**	**Sum of CO Exhaust**	**Sum of NOX Exhaust**	**Sum of SO2 Exhaust**	**Sum of PM Exhaust**
Agricultural Equipment	0.698015136	3.901402268	3.839654335	0.030327495	0.239373982
Construction and Mining Equipment	4.107122551	19.19051051	26.60024745	0.196483996	1.739109399
Industrial Equipment	0.812135794	15.53926774	4.889404317	0.020187259	0.162118416
Lawn and Garden Equipment	5.044850584	54.53294051	1.385800783	0.010412601	0.174546263
Light Commercial Equipment	1.724303059	32.672195	2.808193243	0.018175232	0.265649049
Recreational Equipment	3.914020613	13.97759233	0.152473997	0.055553613	0.059649366
Grand Total	**16.30044774**	**139.8139084**	**39.67577412**	**0.331140196**	**2.640446475**

Indicator (same order as above)	**2005**	**2013 (for 2030 and 2035)**
% Ag jobs	0.00682243	0.00682243
% Building Permits	0.03460039	0.011359602
% Manufacturing Jobs	0.022222651	0.022222651
% Households	0.017540975	0.01784874
% Other Jobs	0.009683282	0.009682254
% Population weighted by Income	0.024174042	0.018783872

	2005				
	ROG	**CO**	**NOx**	**SO2**	**PM**
Agricultural Equipment	0.004762159	0.026617044	0.026195773	0.000206907	0.001633112
Construction and Mining Equipment	0.142108041	0.663999145	0.920378932	0.006798423	0.060173863
Industrial Equipment	0.01804781	0.345323725	0.108655526	0.000448614	0.003602701
Lawn and Garden Equipment	0.088491598	0.956560951	0.024308297	0.000182647	0.003061712
Light Commercial Equipment	0.016696912	0.316374068	0.027192526	0.000175996	0.002572355
Recreational Equipment	0.0946177	0.337894907	0.003685913	0.001342955	0.001441966
Total (tons/day)	**0.364724222**	**2.646769841**	**1.110416967**	**0.009155543**	**0.072485709**
Total (lbs/day)	**729.4484432**	**5293.539682**	**2220.833934**	**18.3110859**	**144.9714179**

2030

Sum of ROG Exhaust	Sum of CO Exhaust	Sum of NOX Exhaust	Sum of SO2 Exhaust	Sum of PM Exhaust
0.119508445	3.037133105	0.515491174	0.002416972	0.019634429
1.462325224	19.49220957	5.852363106	0.030325768	0.273275524
0.22254337	17.25091911	1.405307341	0.003354916	0.031535834
5.360426984	70.09466522	1.339692434	0.005589126	0.195443992
0.737783751	29.82003405	1.054246548	0.00365518	0.152113066
9.459582141	31.1707666	0.342905834	0.140499448	0.140119052
17.36216992	**170.8657277**	**10.51000644**	**0.185841409**	**0.812121895**

2030

ROG	CO	NOx	SO2	PM
0.000815338	0.020720628	0.003516902	1.64896E-05	0.000133955
0.016611433	0.221423751	0.066480518	0.000344489	0.003104301
0.004945504	0.383361156	0.031229655	7.45551E-05	0.00070081
0.09567687	1.251101484	0.023911822	9.97589E-05	0.003488429
0.00714341	0.288725153	0.010207483	3.53904E-05	0.001472797
0.177687581	0.585507692	0.006441099	0.002639124	0.002631978
0.302880135	**2.750839864**	**0.14178748**	**0.003209806**	**0.01153227**
605.7602705	**5501.679728**	**283.5749603**	**6.419612618**	**23.06454089**

2035

Sum of ROG Exhaust	Sum of CO Exhaust	Sum of NOX Exhaust	Sum of SO2 Exhaust	Sum of PM Exhaust
0.10818626	3.059375737	0.412095798	0.002267672	0.014150705
1.420286493	20.32530781	5.044916961	0.032111958	0.220172643
0.222576269	17.69549991	1.389166177	0.00344038	0.029789827
5.761877055	75.37778001	1.437059479	0.006010333	0.209905779
0.748766513	30.64712125	1.024197173	0.003750062	0.151524599
11.31490064	36.53358774	0.404868142	0.168468457	0.167081157
19.57659323	**183.6386725**	**9.712303729**	**0.216048862**	**0.792624711**

2035

ROG	CO	NOx	SO2	PM
0.000738093	0.020872377	0.002811495	1.5471E-05	9.65422E-05
0.01613389	0.230887416	0.057308251	0.000364779	0.002501074
0.004946235	0.39324092	0.030870955	7.64544E-05	0.000662009
0.102842248	1.345398428	0.025649702	0.000107277	0.003746554
0.007249748	0.296733221	0.009916537	3.63091E-05	0.0014671
0.212537646	0.686242239	0.007604991	0.00316449	0.003138431
0.34444786	**2.973374601**	**0.134161931**	**0.00376478**	**0.011611709**
688.8957194	**5946.749201**	**268.3238626**	**7.529560686**	**23.22341872**

APPENDIX D

COMMENTS ON DRAFT PEIR
WITH RESPONSES

Letter A

John O'Donnell

From: Litchney, Seth <Seth.Litchney@sandag.org>
Sent: Friday, April 26, 2019 2:00 PM
To: John O'Donnell
Cc: Hentrich, Katie
Subject: Sustainable Santee - SANDAG Comments

Dear John,

Thank you for providing the opportunity to comment on the City of Santee's Sustainable Santee Plan Draft Environmental Impact Report. The San Diego Association of Governments (SANDAG) is submitting the comment below:

A-1

- As the City of Santee implements its transportation demand management (TOM) strategies in the Sustainable Santee Plan, SANDAG encourages the City to partner with the SANDAG TOM program, iCommute, to take advantage of regional TDM programs and services and implement measures identified in the Sustainable Santee Plan. This includes the GO by BIKE Mini-Grant program, SANDAG Vanpool Program, Guaranteed Ride Home service, support for carpool and transit, and bike encouragement programs. More information on available regional TDM programs can be accessed through www.iCommuteSD.com.

Please let me know if you have any questions or concerns.

Thank you very much,

Seth Litchney
Senior Regional Planner

SANDAG
(619) 699-1943
401 B Street, Suite 800, San Diego, CA 92101

Facebook | Twitter | YouTube
SANDAG *offices are open Tuesday-Friday and every other Monday from 8 a.m.-5 p.m.*

RESPONSE TO COMMENT LETTER A –
04/26/19 SAN DIEGO ASSOCIATION OF GOVERNMENTS

Response to Comment A-1

The City would consider partnering with SANDAG iCommute program to implement transportation reduction measures after the Sustainable Santee Plan ("SSP" or Climate action Plan ("CAP") is adopted.

Letter B

Preserve Wild Santee

April 29, 2019
John O'Donnell, Principal Planner
Santee City Council
10601 Magnolia Avenue
Santee, CA 92071
jodonnell@cityofsanteeca.gov

RE: Santee Climate Action Plan - "Sustainable Santee Plan" (SSP)[1] & **Draft PEIR**

Dear Mr. O'Donnell:

The signatory groups have reviewed the above documents and provide these comments and recommendations as part of the administrative record. Based on our review, we believe that the SSP and PEIR are inadequate unless revised to address our concerns and incorporate our recommendations (or equivalent improvements). All of our organizations have extensive experience working with other local jurisdictions on climate action plans and CEQA documents, and we are available to work with the City of Santee to ensure the preparation of an effective and implementable SSP.

1 This letter interchanges Sustainable Santee Plan (SSP) and Climate Action Plan (CAP) as equivalent terms.

Background and Recommendation for the Environmentally-Preferred SSP Alternative

Human originated Greenhouse Gas Emissions (GHGs) are wreaking havoc upon global life support systems.2 The damage to the atmosphere is so extensive that feedback loops are being unleashed that are accelerating climate breakdown and multiplying the severity of impacts. [3] In this context it is essential that Santee exhibit leadership by producing an effective Climate Action Plan (CAP) that complies with GHG avoidance targets and the law. Aggressive action is essential to slow the deterioration of life support systems for both the current and next generation.[4]

B-1

The Introduction and Executive Summaries for both documents are inadequate because they fail to adequately disclose and summarize the state of current climate science, which must serve as the foundation for the documents and rationale for the CAP project.

B-2

The CAP should include a summary of a recent (2018) IPCC report (https://report.ipcc.ch/sr15 pdf /sr15_spm final.pdf; https://www.theguardian.com/environment/2018/oct/08/global-warming-must-not-exceed-15c-warns-landmark-un-report; https: //www.national geographic.com/environment/2018/10/ipcc-report-climate- -impacts-forests-emissions/), which demonstrates the inadequacy of current climate action, the immediacy of the need to reduce GHGs as rapidly as possible and to **accelerate *removal of carbon* from the atmosphere.**

B-3

Our prior letters were intended to provide direction for development of an effective and compliant CAP with the understanding that cumulative emissions have latent enduring significant adverse impacts. If the final CAP is inadequate, then significant adverse impacts follow. The Final PEIR will also be inadequate if significant impacts of the CAP project are not identified, discussed, avoided when feasible, and mitigated effectively to an insignificant level. Remaining significant impacts must be

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2 Declaration of Dr. James E Hanson, February 7, 2019. Case No. 18-36082, Juliana v. USA. https:// interactive.carbonbrief.org/impacts- climate-change-one- point- five-degrees- two-degrees /? Utm_source=web&utm_ campaign=Redirect_#

3 Boris K. Biskaborn, *"Permafrost is warming at a global scale"* January 2019, Nature Communications. https://www.nature.com/articles/s41467-018-08240-4.pdf

4 "**...it is very unlikely that the 1.5 °C target is achieved this century without massive CO2 extraction from the air.** However, with a phaseout by midcentury the 2 °C goal may still be within reach." J. Lelievelda,b,1, K. Klingmtillera, A. Pozzera, R. T. Burnette, A. Hainesd, and V. Ramanathane. *"Effects of fossil fuel and total anthropogenic emission removal on public health and climate"* March 25, 2019, Journal Proceedings of the National Academy of Sciences.

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disclosed within a Statement of Overriding Considerations. The environmentally superior project alternative analyzed should be selected.

B-4

The CAP and Draft PEIR fail to adequately address consistency with: Executive Order B-55-18[5] that directs the state to achieve carbon neutrality "as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter" [Intended to maintain a 2 degrees Celsius global warming limit, which would still have catastrophic impacts]. Alternative 2 would put the City on a pace to implement EO B-55-18, but the PEIR's analysis is superficial and inadequate. The **Zero Net Emissions** Alternative is the environmentally superior alternative and should be substituted for the project. **Rejection of a carbon neutral alternative is unreasonable, unsupported and unlawful.**

The findings of climate scientists indicate that a net zero carbon emissions alternative that is consistent with EO B-55-18 is essential. Their findings include:[6]

1. "Even if fossil CO2 emissions stop abruptly, global temperatures remain constant for several centuries, which means that past CO2 emissions commit the planet to persistent warming on the human timescale."
2. Rapid phaseout of fossil fuels could prevent the premature deaths of over 3 million people annually from airborne fossil fuel particulates alone.
3. "...it is very unlikely that the 1.5 °C target is achieved this century without massive CO2 extraction from the air. However, with a phaseout by midcentury the 2 °C goal may still be within reach."

Considering the level of warming guaranteed to occur because of past emissions, the huge number of lives at risk and the massive economic costs already being delivered at the current level of climate breakdown, all GHG emissions are now cumulatively significant.

B-5

5.4.2.1 Alternative 2 "Accelerated Reduction Program Alternative" [p. 5-6] briefly mentions the carbon neutrality target of Executive Order B-55-18 without

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s https://www.gov.ca.gov/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf

6 J. Lelievelda,b,1, K. Klingmiillera, A. Pozzera, R. T. Burnette, A. Hainesd, and V. Ramanathane. *"Effects of fossil fuel and total anthropogenic emission removal on public health and climate"* March 25, 2019, Journal Proceedings of the National Academy of Sciences.
Philippus Wester... *"The Hindu Kush Himalaya Assessment"* 2019.
"The End of Ice: Dahr Jamail on Climate Disruption from the Melting Himalays to Insect Extinction" 2/12/2019, Transcript, Democracy Now.
https://www.democracynow.or g/2 019 /2 /12 /the end of ice dahr jamail?tbclid =Iw AR2YEuQGPQ-coCHr53eF-I-NVSy-tM6cUNqv4uyfVjYZbOUfHsTHj0-ih-g

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B-5 Continued

considering implementation strategies. A much more detailed discussion of Executive Order B-55-18 must be incorporated into the entire CAP and PEIR with substantial evidence to support findings. We repeat our request for preparation and adoption of a **"Zero Net Emissions - Maximum Carbon Negative Plan Alternative"** that is equivalent with the goals of EO B-55-18.

Comments and Recommendations for the SSP (CAP)

The CAP must incorporate more details/specific information as identified in our comments in order to meet the requirements of an implementable climate action plan.

B-6

Pages ES-1 to ES-3. Clear and detailed definitions of the terms "city-wide greenhouse gas emissions," "community-wide GHG emissions," "community GHG emissions," and "municipal GHG emissions" must be provided. Are municipal emissions included in the city-wide and/or community-wide emissions?

B-7

ES-4. The status of international treaties and climate efforts is omitted from the plan along with an adequate discussion of global status or impacts. The documents fail without disclosure of this key information.

B-8

ES-5, 6. The status and failure of recycling efforts and the implication for GHG assumptions built into the models relied upon for CAP calculations must be discussed. China is no longer accepting our "recycled" waste stream.[7]

ES-5 Mass Emission Targets

B-9

Table ES-4 and Figure ES-5 fail to acknowledge and discuss Executive Order B-55-18 that directs the state to achieve carbon neutrality no later than 2045 and maintain net negative emissions thereafter. The CAP and PEIR must discuss this Executive Order likely to be codified. The CAP project and Alternatives should include methods to meet this zero net carbon goal, not only because of the Order, but primarily because **substantial scientific evidence**[8] indicates that it is required to slow ongoing climate breakdown and prevent catastrophic global warming.

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7 "Globally more plastics are now ending up in landfills, incinerators, or likely littering the environment... Communities across the U.S. have curtailed collections or halted their recycling programs entirely." https://e360.yale.edu/ features /pilin g- up-how-chinas-ban-on-importing-waste-has-stalled- global-recycling
"Western nations have been puzzling over what to do when the ban went into effect, which it did on Jan. 1" 2018.
https://www.nytimes.com/2018/01/11/world/china-rec yclables-ban. html

8 Declaration of Dr. James E Hanson, February 7, 2019. Case No. 18-36082, Juliana v. USA.

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B-9

ES-5 to ES-8. The summary of community GHG emission reductions required (Table ES-4) and the community GHG emissions projected from implementing the draft plan (Table ES-6) indicates that community choice aggregation (CCA) is a necessary mitigation feature that must be implemented, at least by 2035, to meet the plan's targets. Those numbers imply that the City must begin implementing CCA much sooner (than 2035) so that the program can be operational and deliver anticipated reductions by 2035. A statement should be included in this summary to clarify the required launch date and performance levels to support the reductions projected.

B-10

ES-6. What evidence indicates that the City had control over "63% of total Statewide emission sources." Also, the description preceding Table ES-5 discusses per capita emissions, but the table presents emissions based on service population (which needs to be defined).

B-11

Table ES-6, 6.3 Carbon Sequestration through Preservation of Natural lands
The CAP indicates that approximately half of Santee constitutes undeveloped lands. Why isn't there a carbon storage strategy on some or all of these lands included within the CAP? **Fanita Ranch conservation is an obvious opportunity** at approximately 25% of the city land base where substantial GHG emissions can be avoided while maximizing carbon storage in the sensitive vegetation and soils. The Executive Summary should include a discussion of this opportunity and integrate that into the City's permanent "Draft Multiple Species Conservation Program" where restoration and management of these resource rich lands can leverage carbon storage potential.

B-12

ES7/ES-8. Table ES-6 Community GHG Reduction Strategies and Emission Reductions.
What evidence supports the calculations reported?

Intergovernmental Panel on Climate Change, *"Summary for Policymakers"* https://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf UN
"Emissions Gap Report 2018"
https://www.unenvironment.org/resources/emissions-gap-report-2018 UN
"Nations must triple efforts to reach 2°C target"
https://www.unenvironment.org/news-and-stories/press-release/nations-must-triple-efforts-reach-2degc-target-concludes-annual

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B-13 **Table ES-6, 9.2 Community Choice Aggregation Program**
The CAP would be woefully inadequate without adopting CCA or an equivalent program.

B-14 ***Page ES-9.*** *Include the 2030 target year emission reductions in Table ES-7.*

SSP Chapter 1 Introduction

B-15 **Page 1.** The CAP is not grounded in reality as established by substantial scientific evidence. Instead, the initial paragraph discusses platitudes of "sustainability" while avoiding any serious discussion of the most relevant and consequential science. The CAP refers to old scientific data. 2014 data is referenced for Carbon Dioxide (397 ppm), Methane (1,820) ppb and Nitrous Oxide (326 ppb). Carbon Dioxide is now well over 400 ppm.[9] What are the current levels of GHGs and what are the implications of these levels and their current upward trends? This discussion cannot be omitted.

B-16 **The primary purpose of the CAP should be to align Santee with laws and international efforts intended to prevent catastrophic climate breakdown** by creating an aggressive CAP that encourages additional synergistic plans and actions.

B-17 As stated above, the CAP fails to adequately cite and discuss the best available science on climate change and the existential threat is poses. We strongly recommend that Purpose/Goal 1 be rewritten to state: "Present the City's plan for achieving conformance with regional, state and all other relevant climate change-reducing requirements; improve sustainable resources uses; and prepare the City to effectively cope with anticipated climate-related impacts." [10]

B-18 **Purpose/Goal #3** appears to be the actual purpose of the CAP - which is to achieve CEQA streamlining intended to stimulate development. Building aspirations should not be a motivating force in the CAP.

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9 https://www.theguardian.com/environment/2019/apr/05/why-the-guardian-is-putting-global-co2-levels-in-the-weather-forecast
https://www.esrl.noaa.gov/gmd/ccgg/trends/gl_full.html
World Meteorological Organization. *"WMO Greenhouse Gas Bulletin"* No.14, 11/22/2018. https://library.wmo.int/doc_num.php?explnum_id=5455

10 The economic costs of inadequate climate action are likely to dwarf the costs of effective actions. *"California's Fourth Climate Change Assessment,"* 8/20/2018. http://www.climateassessment.ca.gov/state/docs/20190116-StatewideSummary.pdf

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Threshold of Significance

Without a thorough summary of current climate science, any Threshold of Significance to be adopted by the project lacks the substantial evidence needed for support.

B-19

"Under Section 15183.5 of the CEQA Guidelines, a plan to reduce GHG emissions should:...(B) Establish a level, based upon substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable." [p. 8]

Insufficient evidence is provided to support the quantities of GHG reductions projected and to conclude that development activities qualify for "coverage" or "CEOA streamlining" by the CAP.

B-20

Page 3. The introduction must clearly state that this plan (Sustainable Santee Plan - Climate Action Plan or CAP) is prepared in part to implement the City's General Plan with regard to addressing greenhouse gas impacts and mitigation; and, the plan's measures must be enforceable by the City. Also, this plan must be clear that it is based on the existing General Plan, and that projects that require amendments to the General Plan are not covered by this plan. If this plan is intended to include General Plan Amendments, then the anticipated additional GHG emissions and mitigation measures must be added (this issue is particularly relevant to the CEQA requirements). Note that the CAP completely avoids disclosure of the Fanita Ranch General Plan Amendment application and the repercussions of more than doubling the number of dwelling-units by that auto-based development proposal for VMT calculations and GHG emissions.

B-20

Furthermore, a consistency analysis with Santee's General Plan elements, objectives and policies should be undertaken to identify specific actions needed for alignment.

SSP Chapter 2 Energy and GHG Emissions Inventory. Forecasts. and Targets

B-21

Pages 11-12. Table 2 documents that On-road Transportation has been the primary source of emissions (about 53.5% in 2005 and 60% in 2013). This strongly suggests that transportation (VMT) emission reduction measures should be the most important component of the plan's GHG emissions reduction measures.
However, the plan states (page 12) that "Emissions from energy use account for 54 percent of total community emissions in 2013." - contradicting the data in Table 2. The plan also states that GHG emissions from energy use have increased relative to the energy provided. This trend must be reversed and CCAs are emerging as the

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B-21 Continued

most likely means to achieve those reductions.[11] SDG&E has announced its intention to leave the electricity power purchase business,[12] which is further reason for the City to begin to develop (or join a regional) CCA program.

B-22

Page 13. Energy use by "Outdoor Lighting - City Owned" showed a marked increase compared with "Outdoor Lighting - SDG&E Owned," which showed a significant decrease. What changed with regard to outdoor lighting?

B-23

Page 15. Table 5 should include the 2005 "baseline" and the forecasted/projected emissions for 2030. Year 2030 is a critical target point, and the table's data should be consistent with the data points shown in Figures 5 and 6.

B-24

Page 15. The description of the Inventory Forecast includes the following statement:

> *"To facilitate the Plan's long-term applicability, the forecast for households in 2035 includes a 2,000 household buffer above the build out accommodated by the City's currently adopted General Plan. Growth calculation and methods are detailed in the /FT Report located in Appendix A."*

The IFT Report does not contain a specific call-out for the "2,000 household buffer" nor a discussion of how this was used in the GHG emission forecasts. This "buffer" is not consistent with the General Plan and appears to assume the City will approve one or more General Plan Amendments to allow these additional housing units. The inclusion of the 2,000 units is unacceptable unless the SSP and accompanying CEQA documents fully address this as a formal GP Amendment, with additional impact analyses and mitigation.

B-25

The IFT Report (figures 1 and 2) illustrates past Community GHG emissions that are quantified in tables 3 and 4. The representation of on-road GHG emissions in Figure 1 (2005) and Figure 2 (2005 and 2008) do not appear to comport with the percentages of on-road GHG emissions presented in tables 3 and 4. Please explain the presentations in figures 1 and 2 or correct the figures to reflect the percentage contributions to community GHGs from on-road transportation.

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11 https://cleanpowerexchange.org/resources/cca-101/; https://www.cityofberkeley.info/uploadedFiles/Council_2/Level_3_-_General/100%20RE-CCA%20Study-October%202018(1).pdf

12 https://www.voiceofsandiego.org/topics/government/sdgee-is-looking-to-leave-the-power-buying-business/

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B-26

Nor do the Figure 1 pie chart percentages in 2005 match the percentage data presented in Table 3 for any category [Page A-7]. The Figure 2 bar chart percentages for 2005 and 2008 do not match Table 4 percentages. Please explain.

B-27

Pages 18 & 19. The document provides information regarding per capita GHG emissions reduction and per service population (the latter includes City residents and "jobs") and a brief description of the "State Aligned efficiency target" (based on service population GHG emissions). The CAP provides the rationale for adopting efficiency targets that differ from the ARB's recommended efficiency targets (i.e., the City does not have control over certain State-included emissions). However, the CAP does not explain the relationship between its proposed performance targets and its efficiency targets: it does not describe sufficiently how it will use both the efficiency targets and the State performance target (based on mass emissions). The most important measure of GHG emission reduction "success" is how much the mass emissions are being reduced and are they aligned with the interim and final targets. Specifically, the CAP must clarify, for each target year (e.g., 2020, 2030, 2035) as well as during interim years, how the City will use those targets to determine whether GHG reduction measures' implementation are producing the anticipated and GHG emission reduction results (based on CAP monitoring).

For example, if the efficiency target is met, but the performance target is not met, how will the City use that information to confirm CAP effectiveness and compliance? Meeting the efficiency target is a necessary, but not necessarily sufficient, measure of CAP success. While using the efficiency target may be useful when analyzing a project's (or specific measure's) impact on the CAP, reducing the mass emissions must be the final criterion of success. Do the target numbers in Table 8 imply that the CAP requires the plan overall - and any individual project - to meet both targets, or will it require projects to meet only one target?

Chapter 3 GHG Reduction Measures

B-28

The plan lacks binding actions. There are 39 GHG Reduction Measure Policies listed under 10 Objectives, yet the word "shall" is used only 6 times in those Policies. Reliance upon general policies that "should" be implemented are effectively meaningless because they are so broad that almost any outcome may result.

B-29

Page 23. The CAP proposes to use only 2020 and 2035 target years. Why isn't 2030 included, which is a specific State performance target year? Because GHG emissions and the ability of any CAP's ability to reduce those emissions are difficult to forecast with great certainty, the Santee CAP must include 2030 as a specific target year between 2020 and 2035.

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B-30

Page 24. Objective 1.0: Complete Streets
What is the definition of a "Complete Street" and how does that definition of completeness change depending upon adjacent or connecting land uses?

B-31

Even the policies that use "shall" are diluted with broadly vague language. For example, **Policy 1.3** "The City shall ensure that the entire right-of-way is designed to accommodate ***appropriate*** modes of transportation." What is ***appropriate*** and who decides what is an ***appropriate*** mode of transportation for the right-of-way? When motor vehicle right-of-way is reduced or eliminated, alternative modes of transportation flourish, however, auto users feel entitled to the vast majority of right-of-way. The CAP avoids discussion, or resolution of this and other contradictions. Without analysis and resolution of these issues GHG reductions projected are illusory.[13]

B-32

Page 24-28. The CAP describes that there are no quantitative assessments of the GHG emission reductions attributable to existing regional (SANDAG RTP/SCS) and local (City of Santee Mobility Element) transportation-related measures. This section of the CAP must clearly explain how this section relates to the specific transportation measures in Goal 7 (Transportation), some of which are closely allied/aligned with these policies. Many of the policies in the City's Mobility Element are not mandatory, but only state that the City "should" strive/promote/encourage or implement those policies. How can the City ensure that it will implement those policies and what are the anticipated GHG emission reductions associated with those policies?

B-33

Page 24. The City's Policy 2.1 uses Level of Service (LOS) as a criterion for assessing traffic congestion (which affects GHG emissions), but the State has adopted Vehicle Miles Travelled (VMT) as a criterion for evaluating transportation/traffic congestion impacts (http://opr.ca.gov/ceqa/updates/sb-

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13 Andrew Keatts, *"San Diego can't hit State climate goals without major changes in transportation"* February 14, 2019, Voice of San Diego.
https://www.voiceofsandiego.org/topics/government/san-diego-cant-hit-state-climate-goals-without-major-transportation-changes/
Andrew Keatts, *"A new day at SANDAG as agency admits it must cut promised projects"* February 22, 2019, Voice of San Diego.
https://www.voiceofsandie go.org/ to pics/ government / a-new-day-at-sandag-as-agency-admits-it- must-cut-promised-projects/
Liam Dillon, *"California won't meet its climate change goals without a lot more housing density in its cities"* March 6, 2017, Los Angeles Times.
https: // www.latimes.com /politics /la-pol-ca-housing-climate-change-goals-20170306-story.html

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B-33 Continued

743/). While LOS may be a helpful way to measure potential GHG emission implications, all analyses of traffic must also use the VMT criterion.

B-34

Page 27. Policy 8.4
What is a "non-contiguous" sidewalk?

B-35

Page 27. Policy 9.1
How shall the City "encourage and provide for Ride Sharing" and what is the GHG reduction estimate range for that measure?

B-36

Pages 28-32. This section is termed "Residential Land Uses," but the measures are only addressing "Residential Building Uses," and the section should be renamed. Residential land use measures, such as those associated with changes to locations and densities of development are addressed in general terms in the SANDAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). How is the City of Santee planning to implement land use/density approaches that are recommended in the SANDAG RTP/SCS? Specific land use and density measures should be included in this CAP, similar to how other local jurisdictions have done.

The proposed residential energy reductions measures are voluntary and do not identify specific incentives or prescriptive elements to ensure that the measures are implemented to the levels anticipated. The CAP should provide more specific details regarding those incentives.

B-37

Page 33. Correct spelling (EFFICIENT, not "EFFICIENCT") in the header. Proposed Measure 2.1 projects substantial GHG emission reductions that are in addition to the anticipated reductions that would occur pursuant to required implementation of Title 24 efficiencies. However, the measure is purely voluntary and no specific incentives (or consequences if not fully implemented) are presented that would provide a meaningful assurance of meeting the anticipated reductions.

B-38

Page 38. We have the same concerns regarding Proposed Measure 4 as with the other building energy measures regarding the lack of prescriptive elements that would support the assertion that substantial energy efficiencies/GHG emission reductions would result from thi measure.

B-39

Page 39. Proposed Measure 5.1 calls for preparation of an Urban Forest Management Plan within two years (of CAP approval). The City should use the recently developed Urban Tree Canopy data and reports (https://sdrufc.com/2018/04/24/tree-canopy-maps-and-data-workshop/) as the basis for preparing the forest management plan.

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B-40

Page 42. Measure 6 proposes to reduce heat island effects. This action can/should be linked to the Urban Forest Management Plan, which would be the basis for deciding where, how many and which trees best serve the City's CAP (as well as meet aesthetic, safety and other concerns). Trees should also be part of the City's Complete Street planning Measure 7.5).

B-41

Page 44. We concur that preserving natural lands (Proposed Measure 6.3) should be part of the CAP.[14] Preserving those lands would reduce GHG emissions (compared to being developed). Preservation would also remove carbon from the atmosphere while maintaining the natural resource and open space values of the City. However, the City should include the conservation of additional, potentially developable natural lands as a real quantifiable measure to actually achieve its GHG emission reduction targets.

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14 "Climate and ecological crises can be tackled by restoring forests and other valuable ecosystems, say scientists and activists...Defending the living world and defending the climate are, in many cases, one and the same. This potential has so far been largely overlooked."
https://www.theguardian.com/environment/2019/apr/03/a-natural-solution-to-the-climate-disaster
https://www.theguardian.com/environment/2017/iul/10/earths-sixth-mass-extinction-event-already-underway-scientists-warn
CARB. *"The 2017 Climate Scoping Plan,"* p. 149, 155.

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Conservation of Fanita Ranch would avoid VMT, store carbon, provide: clean water, flood protection, aesthetic views; avoid placing family homes in a very high fire hazard severity zone, protect critical endangered species habitat, protect cultural resources and provide the missing link between regional recreational preserves of Sycamore Canyon and Mission Trails.

B-42

Page 45-50. The Transportation sector comprises the major source of community wide GHG emissions in the City of Santee (see Figure 1 and Table 2 in this CAP). And this sector should be, and is proposed to be, the primary source of GHG emission reductions (Table 10). The City's weblink to the SSP does not include the VMT data for Santee (Appendix AC-1 to Appendix A) based on SANDAG reporting; that data must be provided to the public. Many of the transportation sector measures do not provide a clear description of how the GHG emission reductions were specifically calculated for Santee; they refer to CAPCOA 2011 document as the source for those calculations. And several of the measures have not specified the expected intensity/extent of the actions - nor the metrics that will be used to monitor and report on implementation. Also, many of the City's policies for transportation are written as "should" rather than "shall," which means the implementation is permissive rather than required. It is unclear how the City will ensure that measures such as implementing and expanding the bike master plan (Measure 7.2) can be assured, particularly if the City cannot self-fund this. Of greater concern are the proposed measures to increase the rate of ridesharing (Measure 7.3) and

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B-42 Continued

electrifying the (private vehicle) fleet (Measure 7.4): activating these measures appears to be largely outside of the control of the City unless the City proposes specific prescriptions to require implementation or that significantly increase incentives for implementation. In contrast, implementing complete streets/safe routes to school (Measure 7.5) and increasing bus/transit use by students (Measure 7.6) are more within the City's control - albeit they require additional funding.

B-43

We strongly recommend the SSP include a measure to address parking. Studies have demonstrated, and many jurisdictions have adopted, "unbundling" parking to reduce VMT and increase opportunities for improved commuting: https://parkingpolicy.com/reduced-reguirements/. The benefits of this approach apply to the general public, employees and employers.

B-44

The SSP has the aspirational goal of getting City employees to use transit but no mechanism to accomplish this is provided. The SSP should encourage employees to use transit or other nonautomotive forms of transportation. A parking permit fee for City employees that could be taken as a cash bonus if no permit is purchased or significantly reduced for electric vehicle commuters should be evaluated as mitigation measures to promote reduced VMT and cleaner transportation.

B-45

According to the SSP, on road transportation constitutes 60% of the GHGs generated in the city. Santee has Trolley service that should be leveraged to reduce GHG emissions. Accordingly the SSP should:

1. Add specific plans to increase Trolley ridership by improving and increasing park and ride lots, bike lanes, shuttle busses and pedestrian walkways.
2. Recommend modifications in the Trolley. The Trolley has 27 stops and is inefficient for "rapid" transit. Santee should work with the MTS and the SSP should recommend improvements such as express trains or skip stops to speed up the Trolley and make it more desirable for riders.
3. Overhaul the boarding system. Obtaining a Trolley pass is awkward and time consuming. The options menu is also bewildering to inexperienced riders. "Compass Cards" expire, trains come and go while riders attempt to obtain passes and there is no assurance that a Trolley will be operating for a late evening return trip. Obtaining a pass should be just as convenient as sliding a credit card to obtain a tank of gasoline, so the boarding system should be overhauled to emphasize similar efficiency for passengers.

B-46

Highway 52, which runs through the heart of Santee, is gridlocked during lengthening commuter hours. The City should work with MTS and SAN DAG to expand light rail or express bus lanes along Highway 52. Surprisingly, SR-52 and SR-

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B-46 Continue

125 gridlock are not addressed in the SSP or PEIR. The CAP and PEIR should consider circulation strategies for these freeways that do not induce VMT. [15]

B-47

Furthermore, the SSP/CAP should add a Policy that "The City should encourage the County and nearby jurisdictions to resist approving general plan amendments with huge zoning increases that undermine General Plan Circulation Elements and severely impact regional freeway circulation systems."[16]

B-48

Page 55. We support the 100% clean energy goal but request that the 100% target be for 2030 not 2035 and urge its implementation to be a mandatory policy of the CAP. Community Choice Aggregation/Energy (CCA) or a more effective program if devised, should be required as a foundational element of the CAP. CCA has proven throughout the state that it provides cleaner power at lower rates than Investor-Owned-Utilities (IOUs) that are wedded to a centralized power distribution model.

The PEIR states that Implementation of Community Choice Aggregation (CCA) would provide an additional 50,132 in MT C02e reductions and help the City meet the CAP target (Page 3-12, Table 3.9). The PEIR should affirmatively commit Santee to implementing CCA. It is doubtful that the City could meet CAP goals without CCA.

Page 56. CEOA Screening Tables

"Developers that choose options from the screening tables totaling 100 points or more will be determined to have provided a fair-share contribution of GHG reductions, and therefore are considered consistent with the Sustainable Santee Action Plan." [p. 56]

B-49

What evidence supports a "100 point" conclusion of "fair-share" contribution of GHG reductions that will reduce significant adverse cumulative impacts of a project to a level of insignificance? How is this "100 point" significance threshold being determined?[17]

B-50

The City should facilitate sustainable building and economic development consistent with effective climate action. **Science clearly documents that all**

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15 https://www.voiceofsandiego.or/topics/government/san-diego-cant-hit-state-climate-goals-without-major-transportation-changes/

16 Tiffany Yap, D.Env/PhD, *Wildfire impacts of poorly planned development in San Diego County*, November 13, 2018.

17 Roberts, David, *It's time to start talking about 'negative' carbon dioxide emissions*, Vax, August 18, 2017. https://www.vox.com/energy-and-environment/2017/8/18/16166014/negative-emissions

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B-50 Continued

further GHG emissions are now cumulatively significant.[18] C02e must be removed from the atmosphere.[19]

Current international agreements are insufficient to keep global warming under the 1.5 to 2°C target required to avoid severe impacts that include an unalterable reinforcing breakdown cycle. "2030 emissions will be 12 to 14 gigatonnes above levels needed to limit global warming to 2°C...The world must urgently and dramatically increase its ambition to cut roughly a further quarter off predicted 2030 global greenhouse emissions..."[20] Current policy results trend toward a catastrophic 3.5°C global temperature increase.

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18 Declaration of Dr. James E Hanson, February 7, 2019. Case No. 18-36082, Juliana *v.* USA.
Intergovernmental Panel on Climate Change, *"Summary for Policymakers"* https://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf
UN *"Emissions Gap Report 2018"* https://www.unenvironment.org/resources/emissions-gap-report-2018
UN *"Nations must triple efforts to reach 2°C target"* https://www.unenvironment.org/news-and-stories/press-release/nations-must-triple-efforts-reach-2degc-target-concludes-annual

19 https://interactive.carbonbrief.org/impacts-climate-change-one-point-five-degrees-two-degrees/?utm_source=web&utm_campaign=Redirect#
Laura Poppick. *"The Ocean is Running out of Breath, Scientist Warn"* 2/25/2019, Scientific American. https://www.scientificamerican.com/article/the-ocean-is-running-out-of-breath-scientists-warn /
Jonathan Watts. *"Domino effect of climate events could turn earth into a hothouse state"* 8/7/2018, The Guardian. https://www.the guardian.com/environment/2018/aug/06/domino-effect-of-climate-events-could-push-earth-into-a-hothouse-state
Damian Carrington. *"Last time CO2 levels were this high, there were trees at the south pole"* 4/3/2019, The Guardian. https://www.theguardian.com/science/2019/apr/03/south-pole-tree-fossils-indicate-impact-of-climate-change
Chris Mooney. *"This is where 90% of global warming is going"* 1/18/2016, Washington Post. https://www.washintonpost.com/news/energy-environment/wp/2016/01/18/this-is-where-90-percent-of-global-warming-is-going/?utm_term=.f96386c6fc4 b
LuAnn Dahlman and Rebecca Lindsey. *"Ocean Heat Content"* 8/1/2018, NOAA. https://www.climate.gov/news-features/understanding-climate/climate-change-ocean-heat-content

20 UNEP Release. *World must urgently up action to cut a further 25% from predicted 2030 emissions,* November 3, 2016

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More aggressive actions must occur locally and globally to eliminate the emissions **reduction gap required to limit global warming to 1.5°C to 2°c.21**

> "If we don't, we will mourn the loss of biodiversity and natural resources. We will regret the economic fallout. Most of all, we will grieve over the avoidable human tragedy; the growing numbers of climate refugees hit by hunger, poverty, illness and conflict will be a constant reminder of our failure to deliver." [22]

B-51 Adoption and use of the "CEQA Screening Tables" is unlawful without providing clarity and substantial evidence for the Threshold of Significance assumed to be associated or incorporated appropriately with the Screening Tables.

Specific comments on the screening tables are provided as an attachment to this letter.

B-52 **Pages 57-69.** The municipal emission measures incorporate many of the approaches that are proposed for community wide GHG emission reductions. Because the City has full control over these measures, the City must confirm it will fund the implementation of these measures.

B-53 **Pages 70-72.** Please include the GHG emission reduction targets for 2030 for Municipal Measures (Table 11).

B-54 **Page 72.** The second line of the first paragraph has a typo: (3030 should be 2030).

B-55 **Page 74.** Please include the 2030 GHG reduction targets for municipal emissions to Table 13.

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[21] Vidal, John. *UN on wrong track with plans to limit global warming to 2°C, says top scientist...James* Hansen says current 'half arsed' plans to reduce emissions will lead to dangerous climate change... December 3, 2015.

[22] UNEP Synthesis Report Forward by Erik Solheim, Head of UN Environment and Jacqueline McGlade, UN Environment Chief Scientist. *The Emissions Gap Report 2016*, November 2016.

The Guardian, *"Earth's sixth mass extinction event underway, scientists warn"* https://www.theguardian.com/environment/2017/jul/10/earths-sixth-mass-extinction-event-already-underway-scientists-warn

Lauren Morello. *"Phytoplankton Population Drops 40 Percent Since 1950"* 7/29/2010, Scientific American.

"San Diego County Ecosystems: Ecological Impacts of Climate Change on a Biodiversity Hotspot" 8/27/2018.

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B-56 - What is the GHG reduction assumed for each of these measures? There is not evidence presented to indicate that the reduction quantities assumed are real.

SSP Chapter 4 Adaptation

B-57 **Page 77-78.** The SSP casually mentions warming in a range of 3°F to 12 °F in the context of adaptation. There is not any evidence to suggest that we can adapt to emissions that would result in global warming at the lowest portion of this range, but there is a mountain of evidence suggesting that emissions of that magnitude are catastrophic.[23]

B-58 **Page 80.** One potential adaptation measure to assist vulnerable populations would be to use zoning to locate public spaces that would be suitable as "climate safe/cooling places" and senior residential accommodations closer together. Also, the public transportation system and bike/walking pathways should be designed to allow vulnerable residents to efficiently access climate refuge areas.

B-59 **Page 81.** The elderly population is the most seriously impacted groups when heat waves and electrical service reductions/brownouts occur. The City should consider requiring senior residential facilities to have back-up power (or a certain amount of solar photovoltaic capacity) for such events. Also, reverse call procedures should be in place to notify residents of serious heat events (as well as other events such as

B-60 wildfires). The City should encourage residents to register their cell phones into the Reverse 911 Emergency "Alert San Diego" system. [24]

B-61 **Page 82.** Water is essentially a regionally distributed resource, and County Water Authority drought management plan for the region, as well as any plan by the local water agency (Padre Dam Water District), should be discussed in the CAP.

B-62 **Page 83.** In addition to better educating/informing residents whose homes are within high/very high fire severity areas, the City should consider providing incentives to improve fire resistance [or "harden"] these structures. In particular, the City should consider providing incentives for improvements that both increase fire safety and reduce energy use.

Many of the strategies for addressing vulnerable populations, water availability and wildfire can be applied to provide a level of improved social equity. Particularly if those who are most at risk are prioritized in the adaptation strategy.

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[23] Technical Reports for California's Fourth Climate Change Assessment http://www.climateassessment.ca.gov/techreports/full-list.html

[24] AlertSanDiego cell phone registration linked to address http://www.readysandiego.org/content/oesready/en-us/alertsandiego.html

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B-63 Furthermore, the City should halt the spraying of annual grasses along roads like Fanita Parkway that creates readily ignitable flash fuels. Timely cutting of these areas to approximately 4 inches or less with electric trimmers would be sufficient, keep more carbon in the soils and avoid impacts associated with pesticide use.

SSP Chapter 5 Plan Implementation

B-64 We requested "GHG reduction measures considered for inclusion should be quantified with specific expected reduction levels and estimated cost ranges." We repeat our request.

B-65 **Page 86.** The description of Administration and Staffing needs to include more information about which City departments have primary responsibility for mitigation, monitoring/reporting and adaptation measures. There should be sufficient information to demonstrate that all of the measures are assigned to existing departments/staff or, if necessary, augmented by new departments/staff. There must be evidence that existing staff have the capacity to assume these additional responsibilities, which is highly unlikely.

B-66 **Pages 86-90.** The description of Financing and Budgeting needs to provide more information about which measures are anticipated to be covered by existing City funding programs (including shifting among departments/functions), by new City funding, or would require new outside funding. It should be stated where measures are anticipated to be financed by private sector (commercial and residential).

B-67 **Pages 90-91.** This CAP should summarize the information identified in the two preceding comments in a table. Table 15 provides a reasonable process for identifying measure implementation effort level (timing and difficulty to implement). We recommend this approach be expanded to illustrate, at least in qualitative terms for each measure: staffing needs (existing or new); funding sources (existing or new; City or other government sources or outside/private); and implementation effort (low, medium, high). Within 12 months of the City's adoption of the final CAP and certification of the PEIR, the City must issue a final implementation plan with specifics to replace - where appropriate - the qualitative information in the recommended qualitative implementation plan. That approach should not preclude the City from initiating all measures as is feasible upon final CAP adoption and CEQA PEIR certification.

B-68 **Pages 92-94.** We recommend that the final CAP provide specific timelines for implementing monitoring and reporting (and adaptation measure, if not included in the above-recommended table). We recommend the City update the GHG emissions inventory every three years, or at least as often as the regional inventory; we concur

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B-68 Continued

with the recommendation for annual reporting on CAP implementation and performance. Comments on the screening tables are attached.

Sustainable Santee Plan (SSP) Draft Program Environmental Impact Report Comments by Specific Pages

Executive Summary

B-69

Page 1-2. The summary of the project description must clarify the relationship of the SSP / CAP to the City's General Plan. Local jurisdictions are now making their climate action plans (CAPs) a part of their general plans, intending their CAPs to function as the primary mechanism for reducing greenhouse gas (GHG) emissions that result from implementing their general plans. That approach also requires the jurisdictions to ensure their CAP measures are implementable, monitored/reported, enforceable/ enforced, and funded.

B-70

The partial list of GHG emission reduction measures (strategies) does not discuss key strategies such as "electrification of the fleet," and vehicle miles travelled (VMT) reduction measures. As previously highlighted in our comments on the SSP, we are concerned that the City's approach does not include land use (e.g., development and density) changes. As part of SB 375, jurisdictions are encouraged to use land use and density changes to create more transportation opportunities and reduce vehicle-based GHG emissions. And, because on-road transportation (the majority of which is single occupancy vehicle use) is by far the largest contributing sector to the City's GHG emissions (between 53-60% from 2005-2013), the lack of land use and density strategies is a serious deficiency.

B-71

Therefore, we request adoption of a Zero Net Emissions alternative that prioritizes land use and density measures, that prioritize smart growth, such as increasing transit-oriented-developments (TOD) and relies less on electrification of vehicles. Transitioning more vehicles to electricity does not necessarily encourage more efficient land uses and would require expanded roadways to serve the forecasted population growth.

Introduction

B-72

Pages 2-1 and 2-2. As noted above, the relationship of the SSP to the City of Santee's General Plan must be clarified because GHG emissions result from current community and municipal activities and would increase with implementation of the General Plan, absent the SSP. This is particularly relevant to proposed projects (or City activities) that require amending the General Plan. The SSP does not specify how it addresses general plan amendments, and absent a specific description of whether and how amendments would be addressed, we assume that the PEIR's

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B-72 Continued

"comprehensive analysis" does not include or analyze amendments, which then would have to complete their own GHG assessment, analyze their impacts, and propose additional GHG mitigation measures based on the impacts analysis.

As noted in our comments on the SSP streamlining process, we have concerns about how the quantity of points are assigned, potential double-counting of point credits, and the apparent inability to fully monitor GHG emissions. Because of those concerns (and we assume this approach is not available to general plan amendments), and until those concerns are resolved, we oppose use of the SSP as the basis for CEQA tiering and streamlining.

3.0 Project Description

B-73

Pages 3-17 to 3-21. Table 3.10 (Relationship to the General Plan) provides a list of general plan policies on land use, mobility and housing elements that are not addressed with this level of specificity in the SSP mitigation measures. That is, how were these policies-all of which are phrased as suggestions (....the City "should"...) and not as requirements (...the City "shall"...)-used to develop GHG emission reduction measures in the SPP? Policies require specific programs, regulations, guidelines, etc. to be implemented, and those more specific components do not appear in the SSP and cannot be appropriately evaluated in the PEIR. We believe that the City's SSP must include those more specific components and their projected effects on GHG emissions (reduction) in order for the PEIR to analyze their impacts.

Air Quality

B-74

Page 4.2-17. Table 4.2.E should include the anticipated results for target year 2020. The explanation of data in Table 4.2.E states it" ...presents a summary of the peak daily emissions for the Sustainable Santee Plan baseline year 2005, forecast year 2035, and changes in emissions between baseline year and forecast years." However, the numbers in the row titled "Changes in Emission Totals" are not the arithmetic differences between the 2035 forecast and 2005 baseline values. For example, the table reports total ROG 2035 (2029.3) and ROG 2005 (1680.1) and a net reduction of 351.71; but the difference is 349.2. These discrepancies in emission totals occur for all of the reported air quality indicators. How did the table produce the net difference amounts?

B-75

A large share of air pollutants derive from the transportation sector. Table 4.2.E, or an accompanying table, must present the City's baseline and target years' projections that are attributable to that sector. Projections of regional VMT indicate a continuing, if slowing, rise in VMT (http://www.sdforward.com/pdfs/EIR_final/Section%204.1_5%20Transportation. pdf; see page 4.15-22 for projected VMT). What are the associated Santee VMT data

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B-75 Continued

for the target years and, if overall VMT is increasing, how does that relate to the substantial projected decreases in all of the air quality parameters? The PEIR must present more clear documentation of the VMT and explanations of the relationships with respect to these air quality parameters to justify the findings of no significant impacts.

Biological Resources

B-76

Page 4.3-3 and 4.3-4. The PEIR should provide more discussion/assessment of the lists of mitigation measures that could affect biological resources (i.e., conservation plans) and the thresholds of significance. The development and implementation of an Urban Forest Management Plan (UFMP) could cause the planting of non-native vegetation adjacent to or within lands that are presently conserved by conservation plans (County and City of San Diego MSCP) or are likely to be added to (such parts or all of the undeveloped Fanita Ranch) the MSCP conserved lands. Some non-native species, particularly those that can become "naturalized" already plague some of the MSCP lands. So, the SSP and UFMP should ensure that non-native species are not planted in areas where they would pose impacts to existing or future conservation lands.

B-77

While the SSP does not commit to conserving additional habitat lands as a measure to help reduce GHG emissions, or to enhancing the carbon-capture value of existing conserved natural lands, both of those actions have the potential to contribute to the City's GHG emission reduction plan (the SSP). We request that the City add those as mitigation measures.

B-78

Neither the section on Greenhouse Gas (4.4) nor the section on Biological Resources (4.3) address the carbon absorbing potential of Coast Sage Scrub and Chaparral. Published research from our own San Diego State University has shown that coastal Sage Scrub and Chaparral are very efficient at carbon absorption and oxygen production (see "Mature semiarid chaparral ecosystems can be a significant sink for atmospheric carbon dioxide." Luo, Oechel, Hastings, Zuleta, Yonghaiquian, and Hyojungkwon. Global Change Research Group, Department of Biology, San Diego State University, San Diego, CA 92182, USA Global Change Biology (2007) 13, 386-396).25 The PEIR states that the most predominate natural habitat is Coast Sage Scrub followed by Chaparral, Grassland, and Riparian. According to the PEIR substantial acreage of these natural habitats exist in the southwest and northern sections of Santee (4.2.7). The PEIR should clearly state that these habitats should

25 http://www.californiachaparral.com/images/Luo_et_al_Chaparral_as_carbon_sink_2007.pdf

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B-78 Continued

be preserved both as important biological resources and as a way to absorb greenhouse gas. This should be a salient feature of Santee's Climate Action Plan.

Greenhouse Gases

B-79

Page 4.4-23. Table 4.4.K is missing the entry number for "Total Adjusted Emissions Excluding CCA," which needs to be added to the table (i.e., the value presented in Table 4.4.K (183,125) on Page 4.4-22. [Note: both tables are labeled 4.4.K; re-label as 4.4.K.1 and4.4.K.2?]

B-80

Page 4.4-14. The text must be updated to reflect that the California Air Resources Board adopted new vehicle-based GHG emission reductions pursuant to SB 375, effective October 2018). Targets for the SANDAG region have been raised. See the next comment.

B-81

Page 4.4-24. The text accompanying Table 4.4.M identifies SANDAG SB 375 targets for 2020 (7%) and 2035 (13%) that have been replaced by higher targets [26] (15 and 19%, respectively, effective October 2018: https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets). Those targets were being discussed well-prior to October 2018 (and the issuance of the NOP in August 2017) and, as the PEIR has done for "Wildfire," it must include the newer requirements to reflect the new targets and complete the GHG analysis in light of those targets.

B-82

Page 4.4-25. Table 4.4.N identifies the SSP's on-road transportation sector GHG emissions reduction potential. As stated in preceding comments for Pages 3.17 to 3-21, the SSP does not provide sufficient clarity and assurances that the on-road transportation sector GHG emission reduction measures are clear and enforceable (implementable). Many of the City's transportation-related policies/measures are "permissive" in that they call for, encourage, promote, etc. actions - but do not specifically require that those measures have to be implemented (and identify the implementing mechanism, such as a City regulation, ordinance, funding program, etc.). The City must specify its implementing mechanisms that will be used or developed (and a timeline for those) in order to establish that the PEIR mitigation will occur as anticipated and to justify a finding that the impacts will be mitigated to below the level(s) of significance.27

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26 California Air Resources Board *SB 375 Regional Plan Climate Targets.*

27 Liam Dillon, *"California won't meet its climate change goals without a lot more housing density in its cities"* March 6, 2017, Los Angeles Times. https:/ /www.latimes.com/politics/la- pol-ca-housing-climate-change-goals-20170306-stor y.html

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B-83

Page 4.4-26. Based on the lack of analysis of compliance with Executive Order B-55-18 and other evidence provided within our comment letter, the conclusion that "All potential impacts related to GHG emissions would be less than significant" is incorrect because evidence is not provided to demonstrate that Santee will hit zero emissions on or before 2045, nor that it will maintain net negative emissions thereafter." Either this evidence needs to be provided in the PEIR, or the analysis needs to acknowledge that there are significant and unmitigated impacts following from failure to comply with Executive Order B-55-18.

Wildfire

B-84

Page 4.7-2 thru 4.7-4. The proposed CAP /SSP project would be a net generator of GHGs for more than thirty years, if not longer. High levels of atmospheric C02e have already created an energy imbalance where the earth adds the approximate energy equivalent of 400,000 exploding Hiroshima sized atomic bombs per day.[28] **Any CAP that doe not reach carbon neutrality in short order is adding significantly to the energy imbalance that fuels extreme events and severe fire weather.** [29]

B-85

Aggressive climate action is fire prevention because it reduces the heat energy retained by GHGs that is manifested in severe fire weather events. **Yet, the CAP fails to meet the EO B-55-18 target of net zero emissions by 2045 and carbon negative thereafter.** Science has documented that all human caused emissions now have cumulatively significant adverse impacts. [Hanson, James E.] California and other parts of the globe are experiencing record breaking wildfires of which global warming is a primary factor.3o

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28 Declaration of Dr. James E Hanson, February 7, 2019. Case No. 18-36082, Juliana v.USA,p. 7

29 "Every pound of CO2 emitted in the last hundred years will continue to trap heat in the atmosphere for hundreds of years to come." Stephen Leahy, "Climate change Impacts worse than expected, global report warns", National Geographic, October 7, 2018.

30 "With climate change tipping the scales in favor of hotter temperatures and drier conditions across the entire landscape, vegetation of all types is becoming more flammable...Flames are spreading more rapidly and with greater intensity. Around half of the increase in area burned during western forest fires in recent decades can be attributed to the long-term warming trend...The fire season itself is lengthening: not only have autumn and spring temperatures risen, but there are signs that California's already short rainy season is becoming further compressed...Nights have warmed nearly three times as fast as days during fire season - lowering night-time humidity and supporting unprecedented nocturnal fire behavior...a dawning "era of megafires" will require Californians to proactively adapt to the wildfires of the future."

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B-86 A CAP that is less aggressive than EO B-55-18 will result in additional global warming with **more** severe wildfires in California and other parts of the world.[31] **Therefore. any CAP project that is not equivalent or better (in GHG reductions) than EO B-55-18 has significant adverse impacts in the category of Wildfire and requires a Statement of Overriding Considerations.**

B-87 Specifically, the project's failure to more aggressively reduce emissions exceeds significance Threshold 4.7.2 by increasing the risk of the uncontrolled spread of wildfires and Threshold 4.7.4 by increasing the fire risk to people and structures.

B-88 The project increases the risk of wildfires to such severity that it renders emergency evacuation plans ineffective exceeding Threshold 4.7.1. In fact, the current level of global warming has already made this outcome a reality.[32]

B-89 As a mitigation measure, (and consistent with the direction of Cal Fire Director Ken Pimlott) [33] the PEIR should require a Policy to be added to the SSP stating, ***"Development within the City's Very High Fire Hazard Severity Zones shall be avoided."***

Dr. Daniel Swain, Dr. Crystal Kolden, Dr. John Abatzoglou. *"The era of megafires: the crisis facing California ..."* The Guardian.
https://www.theguardian.com/environment/2018/aug/07/california-wildfires-megafires-future-climate-change
"lnfographic - Western Wildfires and Climate Change"

31 https//theconversation.com climate-change-and-wildfires-how-do-we-know-if-there-is-a-link-101304
https://www.pbs.org/ news hour /show /climate-change-is-making-wild fires- more-extreme-heres-how
https: //www.carbonbrief.org/factcheck-how- global-warming-has-increased-us-wildfires

32 Simon Romero. *"A frantic knock..."* November 21, 2018, New York Times.
https://www.nytimes.com/2018/11/21/us/paradise-fires-emergency-alerts.html

33 Don Thompson. *"Cal Fire chief State must consider ban on homes in fire-prone areas"* December 11, 2018. Associated Press.
https://www.mercurynews.com /2018/1 2 /11 /cal-fire-chief-state-must-consider-ban-on-homes-in- fire-prone-areas/?fbclid=IwAR3PmPxWso7 jmMKlz9sN-r85oY7hWFbRD_ZqU-c6gE-PPeTlvANZlwQPOtO

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Alternatives

B-90 Selection of the proposed CAP/SSP would result in much greater emissions than Alternative 2 with cumulatively significant adverse impacts upon wildfire risk and climate. Water supplies may also be severely impacted as heat waves and duration of droughts increase.

B-91 Urban forests and other vegetation provide needed carbon storage and help to reduce the heat island effect, but cannot offset the adverse impacts of the GHG emissions that would continue under the proposed CAP/SSP project versus Alternative 2. The vegetation proposed by the SSP may also introduce a necessary risk of added fuel for severe fires. That risk would be significantly reduced under Alternative 2 because less GHG emissions would be accumulating in the atmosphere at net zero.

B-92 **Page 5-8.** Without proposing a tree ordinance, why does the PEIR conclude that trees will be "native and drought resistant and thereby less susceptible to fire"? What species has the City approved and planted in the past and what trees have been planted recently that are representative of current policy? Tree species selection and arrangement are important risk mitigating factors during mild to moderate fire weather conditions. However, even fire resistant native species can contribute to the intensity of blazes under more severe conditions of a wind driven, ember-laden firestorm. The frequency of severe weather conditions that produces extreme wind driven fires is increasing as GHGs continue to accumulate in the atmosphere. [34] Furthermore, as GHG emissions continue, the Very High Fire Hazard Severity Zone will expand to include the riparian areas of Sycamore Canyon, Forester Creek and the San Diego River floodplain in the heart of the city.

B-93 **Pages 5-9 and 5-10.** The discussion of the attainment of project objectives asserts that Alternative 2 (more aggressive implementation of measures) would result in significant and unavoidable aesthetic impacts due to larger renewable energy projects and other measures required to meet the more aggressive time line.

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34 Union of Concerned Scientists. *"Is Global Warming Fueling Increased Wildfire Risks?" - The effects of global warming on temperature, precipitation levels, and soil moisture are turning many of our forests into kindling during wildfire season."* https://www.ucsusa.org/global-warming/science-and-impacts/impacts/global-warming-and-wildfire.html
https://www.ucsusa.org/global-warming/science-and-impacts /impacts /infographic-wildfires-climate-change.html

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An accelerated SSP would be consistent with Executive Order B-55-18 (https://www.gov.ca.gov/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf) that seeks to have California achieve carbon neutrality by 2045.

B-94

The PEIR does not explain its assumption why larger renewable projects would be required. The alternative does not propose to change the mitigation measures, such as by adding new facilities that aren't planned in the Proposed Project - just to advance the timelines for implementing them. In fact, distributed generation is viable and more efficient than large centralized energy projects assumed to be needed by the PEIR. The PEIR's assumption is wrong and conclusory. Furthermore, The PEIR's conclusory statement that accelerating mitigation measures would outstrip the City's funding resources to implement the mitigation measures isn't justified. The SSP and PEIR have not identified the specific levels of funding necessary to implement the Proposed Project, and therefore cannot arbitrarily conclude that an accelerated mitigation approach is financially infeasible. An accelerated alternative would be feasible and is the environmentally preferred alternative.

B-95

Furthermore, CEQA requires cumulatively significant GHG emissions to be avoided when feasible and adequately mitigated below a level of significance on a project-by-project basis now, which may result in greater reductions than the proposed SSP.

Therefore, a **"Zero Net Emissions - Maximum Carbon Negative Plan Alternative"** consistent with Executive Order B-55-18 should be prepared and adopted.

Mitigation and Reporting Program

B-96

A fatal flaw of the SSP (climate action plan) is that it does not provide sufficient clarity and assurances regarding the indicators and metrics for implementation and monitoring of the mitigation measures, which is required pursuant to CEQA.

Conclusions

B-97

Based on the preceding comments and recommendations, the signatory organizations conclude that the SSP and PEIR are inadequate and do not meet the requirements of an effective and implementable climate action plan, and do not avoid, minimize and mitigate anticipated, significant environmental impacts that would arise from the proposed project. Alternative 2 to the proposed project is both the environmentally superior project as well as one that best aligns with local, state and global needs for effective climate action planning.

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Preserve Wild Santee

Thank you for considering these comments.
/s/

Van K. Collinsworth, Geographer/Director
Preserve Wild Santee

Mike McCoy, President and Bill Tippets, Board Director
Southwest Wetlands Interpretive Association (SWIA)

Richard W. Halsey, Director
California Chaparral Institute

Dr. Peter Andersen, Chair
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Dr. Dan Silver, Director
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Frank Landis, Conservation Chair
California Native Plant Society, San Diego

Sophie Wolfram, Director of Programs
Climate Action Campaign

Duncan Mcfetridge
Save Our Forests & Ranchlands
Cleveland National Forest Foundation

Attachment 1 Comments on GHG Screening Threshold Criteria
Attachment 2 Supporting References CD
02 18 James Hansen Dec Juliana v US w Exhibits.pdf
03 Permafrost warming at global scale.pdf
04 06 V Ramanathan Scripps.pdf
4 Report/ Phasing out fossil fuels could save 3.6 million lives per year - The San Diego Union-Tribune
5 EXO B-55-19 9.10.18-Executive-Order.pdf

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6 RiRyJZ-2019_Book_TheHinduKushHimalayaAssessment.pdf
6 The End of Ice/ Dahr Jamail on Climate Disruption from the Melting Himalayas to Insect Extinction |
7 Piling Up/ How China's Ban on Importing Waste Has Stalled Global Recycling - Yale E360
7 Plastics Pile Up as China Refuses to Take the West's Recycling-The New York Times
8 EGR-KEYMESSAGES_2018.pdf
08 EGR2018_Fu11Report_EN.pdf
8 Nations must triple efforts to reach 2°C target, concludes annual review of global emissions, climate
9 20180827-SummaryBrochure.pdf
09 20190116-StatewideSummary.pdf
9 Key Findings 20190116-StatewideSummary.pdf
10 co2_trend_all_gl.pdf
10 Why the Guardian is putting global CO2 levels in the weather forecast | Environment | The Guardian
10 ghg-bulletin_14_en.pdf
11100 RE-CCA Study-October 2018(1).pdf
11 Community Choice 101 - Clean Power Exchange.pdf
12 SDG&E Is Looking to Leave the Power-Buying Business - Voice of San Diego
13 15 Voice of San Diego San Diego Can't Hit State Climate Goals Without Major Transportation Changes - Voice of San Diego
13 27 California won't meet its climate change goals without a lot more housing density in its cities - Los Angeles Times
13 Voice of San Diego 'A New Day at SANDAG' as Agency Admits it Must Cut Promised Projects - Voice of San Diego
14 A natural solution to the climate disaster | Letters | Environment | The Guardian
14 CARB2017 CAP Plan Requirements.pdf
16 San Diego BoS - Wildfire Comment Letter - Final.pdf
17 It's time to start talking about "negative" carbon dioxide emissions - Vax
19 Climate Change/ Ocean Heat Content
19 Domino-effect of climate events could move Earth into a 'hothouse' state | Environment |The Guardia
19 Interactive/ The impacts of climate change at 1.SC, 2C and beyond | Carbon Brief.pdf
19 Last time CO2 levels were this high, there were trees at the South Pole | Science | The Guardian
19 The Ocean Is Running Out of Breath, Scientists Warn - Scientific American.pdf
19 This is where 90 percent of global warming is going - The Washington Post.pdf
20 Emission Gap 2016 press release
21 UN on wrong track with plans to limit global warming to 2C, says top scientist | Environment |The Guardian.pdf

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22 20180827-Biodiversity_CCCA4-EXT-2018-010.pdf
22 Earth's sixth mass extinction event under way, scientists warn | Environment | The Guardian
22 Phytoplankton Population Drops 40 Percent Since 1950 - Scientific American.pdf
23 Full Technical Report List - California Climate Assessment
24 AlertSanDiego
25 Luo_et_al_Chaparral_as_carbon_sink_2007.pdf
26 Regional Plan Targets | California Air Resources Board
29 Climate change impacts worse than expected, IPCC 1.5 report warns.pdf
30 lnfographic-Western-Wildfires-and-Climate-Change.pdf
30 The era of mega fires/ the crisis facing California and what will happen next | Environment | TheGuadian.pdf
31 Climate change and wildfires - how do we know if there is a link?
31 Climate change is making wildfires more extreme. Here's how | PBS NewsHour
31 Factcheck/ How global warming has increased US wildfires | Carbon Brief
32 A Frantic Call, a Neighbor's Knock, but Few Official Alerts as Wildfire Closed In - The New York Times
33 Cal Fire director/ State should ban homes in fire-prone areas.pdf
34 Is Global Warming Fueling Increased Wildfire Risks? | Union of Concerned Scientists
35 Final2018Report_SB150_112618_02_Report.pdf

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Attachment 1 (Comments on Appendix C Greenhouse Gas Emissions Screening Tables - Attachments A, B and C)

B-98

Page C-3. The document makes a bold, errant, unsupported claim that the CAP "includes specific local requirements that will substantially lessen the cumulative problem." In fact, because the CAP fails to select a net zero emissions environmentally superior alternative consistent with EO B-55-18, the CAP/SSP fails to reduce emissions to an insignificant level. Science and "international efforts" clearly articulate that current efforts are inadequate to transition as quickly as possible to net zero emissions and begin removing carbon from the atmosphere, which is required due to the latent adverse effects from past emissions. *[2018 Progress Report California's Sustainable Communities and Climate Protection Act* and all attached references]35

B-99

Page C-5. The CA Air Resources Board (ARB) provides a summary of GHG emission calculation methodologies that should be included in the list of sources for calculating GHG emission: https://ww3.arb.ca.gov/msei/categories.htm

B-100

Pages C-2 to C-4. The methodology for allowing projects to avoid specific GHG emission calculations and analysis/mitigation pursuant to CEQA could be a valuable mechanism to allow for project streamlining and increasing GHG emission reductions. However, based on the proposed approach: though projects that would "qualify" for streamlining will (likely) still contribute to the City's GHG emissions, they would not be quantifying those emissions. If that is so, how would the City track/monitor and report the contributions to GHG emissions and verify that the CAP's commitments to achieving the targets are on track?

B-101

As noted in our comments on the Sustainable Santee Plan, the plan must be based on anticipated population growth and development per the City's General Plan. Any projects that require amending the General Plan should not be eligible to use the streamlining approach and must complete their own GHG emission (impact) analyses, propose all appropriate additional mitigation measures.

B-102

Pages C-7 to C-12 (Table 1). How were the points for each level of implementation for each feature (i.e., each specific GHG emission reducing activity) determined? Appendix C (Methodology) does not provide sufficient information to understand that point assignments. It is not apparent how the proposed assignment of points corresponds to each feature's actual contribution to project (and overall CAP) GHG reductions. For example, the maximum points for home insulation (11) are equivalent to those for very high efficiency water heaters (11); maximum cool r o o f s

35 Key Finding: "California is not on track to meet greenhouse gas reductions expected under SB 375."

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B-102 Continue

points (8) are comparable to those for very high efficiency lighting (7) and water reuse/grey water (7) or recycled water (7).
Another question raised by the table is whether it incorporates any "double-counting" of features' point values. For example, "Energy Star Homes" are assigned 15 points, but does that feature incorporate some (all) of the individual energy-saving features? Similarly, does the "Water Sense" (EPA certification) incorporate some/all of the individual water/energy saving features?

B-103

Page C-9. How do the points for solar panels and wind generation comport with the state's mandate that requires new residential homes to include solar PV (https://www.greentec hmedia.com/articles/read/everything-you-need-to-know-about-californias-new-solar- roof-mandate# gs.2mvtyo)? The intent of the state's requirement is to have new residential housing be zero net energy use, so the points appear to be unjustified for all new residential housing projects that are planned for construction in 2020 and beyond.

B-104

Page C-11. The category "Land Use Based Trips and VMT Reduction" is a critical component of any screening tool. As the CAP notes, on-road transportation is by far the largest GHG emission sector, so any development will create substantial additional GHG emissions. Residential development projects that are located close to existing urban developments and transit will have lower VMT than more remote developments. The proposed maximum points for mixed use project (up to 71 points) need more explanation that would justify a single feature providing nearly 75% of the 100 points needed to avoid analyzing a project's actual (calculated) GHG emissions. Leaving the possible point values for Mixed Use, Residential Near Local Retail, and Other Trip Reduction Measures, as "TBD," appears to leave total discretion to the city to determine precise scoring criteria on a project-by-project basis. What is the value of a Screening Table for development projects if it does not provide clear and consistent criteria by which to evaluate consistency with the Climate Action Plan?

B-105

Pages C-13 to C-19 (Table 2). As a general comment, we have similar concerns with Table 2 as with Table 1: how were the points determined and are features that are assigned similar scores (particularly for maximum points) really providing equivalent GHG emission reductions? All "TBD" features need to have points assigned as part of the adoption of the CAP.

B-106

Page C-22 (project GHG determination flow chart). The preceding comments on the screening tables raised several question regarding how a qualifying project's GHG emissions compare to actual (calculated) GHGs emitted. Apparently a project qualifying under Option 1 would be exempt from CEQA analysis for GHG emissions "by process conformance." However, it is not clear how the project's resulting GHG emissions would compare to a project that had to use Option 2 (reduce its GHG

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B-106 Continued

emissions by 55% after applying all of the CAP measures), and what are the residual emissions? For Option 2, the finding of significance is proposed to be based on the percentage reduction in mass emissions. Because the City has included per capita/per service population criteria in its draft CAP, how does the City intend to use/apply those metrics? Furthermore, what evidence supports a conclusion that a 55% reduction in GHGs for a project reduces impacts to a level of insignificance?

B-107

Pages C-23 to C-25 (TPP and SCS checklist). Please confirm that this checklist conforms to guidance in the regional RTP/SCS and is consistent with any other similar local jurisdiction's checklist.

B-108

Pages C-26 to C-28. As stated previously, the methodology for preparing the screening tables and assigning points needs to be better explained and justified.

RESPONSE TO COMMENT LETTER B –

04/29/19 PRESERVE WILD SANTEE

Response to Comment B-1

Revisions to Chapter 1 of the SSP includes the requested discussion summarizing the state of current climate science that was written by Van K. Collinsworth of Preserve Wild Santee. See SSP page 2. In addition, Chapter 1 describes the benefits of the SSP, and the regulatory setting regarding climate change and greenhouse gas reductions. These discussions describe what the comment refers to as "the foundation for the documents and rationale for the CAP project."

Response to Comment B-2

A summary of the 2018 IPCC report has been added by Van K. Collinsworth of Preserve Wild Santee to the end of Climate Change Science section of Chapter 1 of the SSP (Page 3). This paragraph reads:

In October 2018, IPCC published a report on the impacts of global warming of 1.5°C above pre-industrial levels, The report states that global warming, at its current rate, will result in the a global temperature increase of 1.5°C , sometime between 2030 and 2052. The report also states that in order to keep global warming below 1.5°C, global net anthropogenic CO_2 emissions should decline by about 45 percent from 2010 levels by 2030, and reach net zero around 2050.

Response to Comment B-3

As shown in Table 12, *Community Emissions and Targets Comparison*, the SSP reduces GHG emissions consistent with State legislation. Specifically, this table, along with Table 13, Figure 12, and Figure 13 of the SSP, summarizes the baseline 2005 community and municipal emissions, the projected 2020, 2030, and 2035 emission inventory, and the reduced 2020, 2030, and 2035 inventories after implementation of the reduction measures for community and municipal operations, respectively. These tables and figures show that implementation of the SSP meets the 2030, and 2035 targets. As such, Chapter 4.4 of the Draft EIR determined that cumulative impacts associated with GHG emissions are less than significant. The PEIR identifies no significant and unmitigable impacts, meaning that pursuant to State CEQA Guidelines, section 15093, no Statement of Overriding Considerations is required prior to the adoption and approval of the SSP.

Response to Comment B-4

On September 12, 2018, California Governor Jerry Brown announced through Executive Order B-55-18, the following GHG emissions target: by 2045, California will be carbon neutral. This executive order is more ambitious and replaces the 2050 goal found in Executive Order S-3-05. The order directs the California Air Resources Board to provide a plan with specific regulations to reduce statewide sources of GHG emissions. The Executive Order does not include a specific guideline for local governments, and as of now, the Air Resources Board has not developed a Scoping Plan to reach the B-55-18 target, or developed a methodology for monitoring progress towards carbon neutrality.

The horizon year for the SSP is 2035, consistent with other regional climate action plans and the City of Santee's Mobility Element. Further, 2035 represents the mid-point between the state's reduction targets for the years 2020 and 2050. The City acknowledges the carbon neutral goals of Executive Order B-55-18 and an adopted Sustainable Santee Plan will be a large first step towards this goal. In the SSP implementation section (Page 92-94), the City commits to updating inventories and refining measures every 3 to 5 years. Inclusion of the Executive Order in subsequent SSPs, with horizon years beyond 2035, could be accomplished once the State develops a Scoping Plan towards carbon neutrality.

Response to Comment B-5

Section 5.4.2.1 of the PEIR (Description of Alternative 2), discusses Executive Order B-55-18. This Executive Order was adopted in October 2018 and required the California Air Resources Board ("CARB") to develop a framework for implementation and accounting that tracks progress towards this goal. This framework has not yet been completed and there are no reasonably foreseeable methods to achieve this goal. For example, there is no current process available to replace all carbon-based fuel vehicles with some carbon neutral vehicle. It would be premature to include specifics on carbon neutrality as this option is infeasible today. The SSP provides a step forward towards this carbon neutral goal. The City considers the SSP a "living document" that will continue to build upon the reduction trend that it starts. In Chapter 5 of the SSP a Section titled "Next Steps" explains the continued commitment toward carbon neutrality as the City continues to reduce emissions beyond 2035. That section reads as follows:

"The Sustainable Santee Action Plan is not a static document and will continue with monitoring, inventory updates, and continued refinement of target setting to complement State goals and actions. To that end, while this current document has a horizon date of 2035, the City also recognizes the long term State goal found in Executive Order B-55-18 of carbon neutrality by 2045 and is committed to updating the Sustainable Santee Plan at regular intervals to continue reducing emissions that will complement State actions and provide the City's contribution toward the State's long term goal.

Towards this end, the City commits to:

1. City staff will monitor CARB's development of a methodology and accounting procedure needed to progress towards the carbon neutrality goals on Executive Order B-55-18.

2. Within two (2) years of the final CARB rulemaking regarding carbon neutrality, staff will bring for City Council consideration an Amendment to the Sustainable Santee Plan that includes revised Measures/Actions designed to achieve this goal, including but not limited to further incentives for electrification of existing buildings within Santee through San Diego Gas & Electric and/or any CCA program in which the City participates.

3. Within three years of approval of the Sustainable Santee Plan, City Staff will develop a plan to install solar PV systems to the maximum extent possible at all City facilities. This plan shall be incorporated into the City's Capital Improvement Program ("CIP").

Since the plan is designed to be updated every 3 years, CARB may have a better solution in the near future that can be included in future SSP updates.

Response to Comment B-6

Table 1 of Appendix A of the SSP defined these terms. The terms city-wide GHG emissions, community-wide GHG emissions, and community GHG emissions are synonymous. Table 1 has been clarified on this point.

Response to Comment B-7

Chapter 1 of the SSP includes a detailed description of the regulatory setting within which the SSP will operate. This includes federal and state statutes and regulations. There is no requirement to discuss international efforts on climate change in the SSP, and the commenter does not explain why SSP fails without the inclusion of additional regulatory schemes that do not directly apply to the United States or the State of California. Regardless, the commenter has provided 2,204 pages of articles from around the world documenting such issues, and

these documents are included within the administrative record for the SSP and its environmental review.

Response to Comment B-8

By reducing the amount of waste, the City and the County can reduce its reliance on China for accepting recycling material as noted by the commenter. GHG emissions can be reduced by reducing the size of the recycling stream and the resulting GHG emissions spent moving it to China. See response to comment I-27.

Response to Comment B-9

Work on a CCA has already begun. It is true that a CCA will be required to meet the GHG emissions reduction targets in the years 2030 and 2035. There is no requirement to specify a launch date. Also, the goal of the CCA providing 100% renewable energy by 2035 is listed on Page 55 of the SSP. This is the performance level suggested by the commenter. See responses to comments B-4 and F-2, and I-36.

Response to Comment B-10

The discussion on page ES-6 explains how it was determined that Santee had control over 63% of total state-wide emission source types. Table 16A in Appendix A was added to provide additional details on this point.

Table 16A GHG Emissions by Source

Sector	2015 Statewide Emissions (MMT CO_2e)	Percent of Total 2015 Statewide Emissions
Commercial Natural Gas	10.50	2.38
Residential Natural Gas	21.90	4.97
Solid Waste	8.73	1.98
On-Road Transportation	149.42	33.93
Residential and Commercial Electricity and Water	83.67	19.00
Wastewater	1.82	0.41
Off-Road	2.53	0.58
Above Sectors Total	**278.57**	**63.26**
Statewide Total	**440.36**	**-**

Source: CARB. California Greenhouse Gas Emission Inventory (2018).

The term service population is identified on page vi of the SSP. The footnote under Table ES-5 has been expanded to add clarity.

Response to Comment B-11

The SSP discusses carbon sequestration. It is listed as a supporting measure as the measure does not reduce man's production of GHG. As such, the discussion of the Multiple Specifies Conservation Plan is outside the scope of a plan aimed at reducing GHG emissions.

Response to Comment B-12

Table ES-6 presents a summary of each reduction measure listed in Chapter 3 of the SSP. The source document for reduction calculations was identified under each measure in Chapter 3. A detailed discussion of reduction calculations is provided in Appendix C of the SSP.

Response to Comment B-13

This comment expresses support for adopting a CCA. Establishment of a CCA is included as one of the GHG reduction strategies.

Response to Comment B-14

Tables ES-7 and 11 (Municipal GHG Reductions Strategies and Emission Reductions) were modified to add a column for the year 2030 and eliminate year 2020. Year 2020 reduction quantification was eliminated because the earliest the SSP could be adopted is January 2020 and there is not sufficient time to implement the reduction strategies and show progress in 2020. This change did not affect the environmental impacts identified in the PEIR. The revised table ES-7, which contains the same data as Table 11, is shown below:

TABLE ES-7 **Municipal GHG Reduction Strategies and Emission Reductions**

Goal and Measure		2030 Emission Reductions (MT CO_2e)	2035 Emission Reductions (MT CO_2e)
Goal M-1: Increase Energy Efficiency in Municipal Buildings			
M-1.1: Procurement Policy for Energy Efficient Equipment		19	19
M-1.2: Install Cool Roofs		4	4
M-1.3: Retrofit HVAC and Water Pump Equipment		12	12
Goal M-2: Increase Energy Efficiency in Community Buildings and Infrastructure			
M-2.1: Traffic Signal and Outdoor Lighting Retrofits		212	421
Goal M-3: On-Road Energy Efficiency Enhancements; Employee Commute and Vehicle Fleet			
M-3.1: Encourage or Incentivize Employee Carpools		6	14
M-3.2: Encourage or Incentivize Purchase of Hybrid or Electric Vehicles		5	11
M-3.3: Replace or Supplement Vehicle Fleet with Hybrid/Electric Vehicles		7	16
M-3.4: Install E-Vehicle Chargers	Supporting Measure		
Goal M-4: Reduce Energy Consumption in the Long Term			
M-4.1: Ongoing City Facility Retrofits and LED light Conversions	-	-	558
Total Municipal Measures			
Total of all Measures listed above		264	1,054

BAU = Business as Usual

MT CO_2e = metric tons of carbon dioxide equivalent

SDG&E = San Diego Gas & Electric

Response to Comment B-15

The concentrations of GHGs in the atmosphere have been updated on Pages 2 and 3 of the SSP. However, the changes in GHG concentrations do not change the State targets for GHG emission reductions or affect the reduction measures in the SSP.

Response to Comment B-16

This is the opinion of the commenter. No response is required

Response to Comment B-17

See Responses to Comment B-1 and B-7, regarding the SSP's discussion of climate change science and the relevant regulatory setting.

Response to Comment B-18

This is the opinion of the commenter. No response is required

Response to Comment B-19

The Sustainable Santee Action Plan is designed to meet State targets for GHG emissions reductions. The target levels for 2030 and 2035 of the Sustainable Santee Plan meet the State targets for GHG emissions reductions. The plan holistically evaluates GHG emission throughout all sectors of human activity. The plan uses established methodologies from the California Air Pollution Control Officers Association ("CAPCOA") for modeling the GHG emission reduction potential for measures / actions in the plan. If a future project is not consistent with the Sustainable Santee Action Plan, ordinances / actions enacted to support the Sustainable Santee Action Plan, or the Consistency Checklist it would be cumulatively considerable and a full GHG analysis would be required. The evidence is located throughout the plan and in Appendix A. Appendix C of the SSP provides very detailed explanations of the reduction calculations for each Reduction Goal in the SSP. Further, the comment states that the SSP includes insufficient evidence supporting the quantities of GHG reductions projected; however, the comment does not elaborate on which reductions the commenter takes issue with, or explain why it believes insufficient evidence supports the quantities of reductions projected. Substantial evidence supporting the quantities projected is provided in both the SSP's main text and the appendices supporting the SSP. Therefore, CEQA streamlining or tiering would be available for future projects that are consistent with the SSP using the Consistency Checklist. Nonetheless, future projects may also choose to undertake their own project-level analysis of greenhouse gas emissions.

Response to Comment B-20

The SSP explains the relationship of the General Plan with reduction targets. See page 15 (explaining the relationship between the SSP horizon year and the General Plan horizon year), and page 24 (explaining existing local reductions found in the General Plan). Further, Section 3.2 of the PEIR analyzes the SSP's relationship with the Santee General Plan.

Page 15 of the SSP discusses a 2,000 dwelling unit buffer above the General Plan buildout to accommodate submitted and projected applications for General Plan Amendments, as well as SANDAG-projected growth. Appendix A of the SSP has additional information on the 2,000 dwelling unit buffer rational and how this growth was included into the SSP forecasts. Accommodating this buffer allows the City to ensure that future development (for which applications are already submitted or anticipated in the near future) are accounted for in the City's emissions reductions efforts and policies. As shown in the SSP and the PEIR, even with this buffer, the City can meet its targets. Further, the addition of a buffer requires the City to make greater GHG reductions than if a buffer was not added. If the units accommodated by the buffer ultimately do not come to fruition, the City is committing to greater reductions than what would be required by the build-out to the existing General Plan only.

In addition, the Fanita Ranch development is considered a probable future project for purposes of CEQA, in that it is currently undergoing environmental review. Further, the Fanita Ranch development has been assumed as a cumulative project in the City's Mobility Element CEQA analysis, and by including a 2,000 dwelling unit buffer in the SSP, the City is ensuring that the assumptions underlying the City's General Plan are consistent with those underlying the SSP. Regardless of the inclusion of the dwelling unit buffer in the SSP, future projects (whether Fanita Ranch or any other development project) will always have the option to conduct their own project-specific greenhouse gas emissions analysis under CEQA. In other words, the Fanita Ranch development can move forward with or without the SSP in place – however, if the SSP is not in place, the Fanita Ranch development will be required to undertake its own greenhouse gas emissions analysis. Finally, the inclusion of a 2,000 dwelling unit buffer in the SSP in no way commits the City to approving any specific future project, including the Fanita Ranch development.

Response to Comment B-21
The information in Table 2 is correct. The second sentence on Page 13 was revised to read: Emissions from energy use account for 3154 percent of total community emissions in 2013.

This change in number did not affect the State GHG reductions targets of the SSP or GHG reduction measures.
The remainder of comment addressed the commenter's preference for CCAs.

Response to Comment B-22
The data sources were checked and no errors were found. The data are reliable. The total electricity use by outdoor lighting decreased from 2005 (2,348,856 kWh) to 2013 (1,983,336 kWh). Many lights were added to the City's light inventory with the development of Town Center Community Park in 2010. This is the principal reason for the increase.

Response to Comment B-23
As discussed in the CAP, Table 5 lists the growth indicators for the years that the data were directly collected and the forecast years of 2020 and 2035. This table includes the most recent collected data (2013) and is used to forecast growth.. The 2005 baseline was used to set reduction targets, but not to calculate forecasts. The 2030 growth numbers were interpolated using data from the 2020 and 2035 forecast years.

Response to Comment B-24
The City is currently processing the above numbered applications. These applications represent additional 2,000units These units represent real applications and reasonably foreseeable units. The additional dwelling units was included in the SSP as a 2,000-unit land use buffer in the growth forecasts. Appendix A of the SSP includes a discussion and table on the applications used in the 2,000-unit buffer included in the growth forecasts.

The California Environmental Quality Act Section 15355 requires the lead agency to review the cumulative effects of reasonably foreseeable projects. Since the Sustainable Santee Plan's horizon year is 2035, it was prudent to include the above current and reasonable foreseeable development projects.

This approach is the most conservative and the most protective of the environment, because it adds 2,000 dwelling units above General Plan buildout scenario, more GHG reductions are required. If these units are not built and the GHG reduction measures remain the same, then the City will be at a lower GHG emission level than if the units were not added to the total. This coincides with commenter's desire to achieve GHG reductions quicker.

Response to Comment B-25
Data represented in Tables 3 and 4 of Appendix A are correct A and Figures 1 and 2 of Appendix A have been revised to the following:

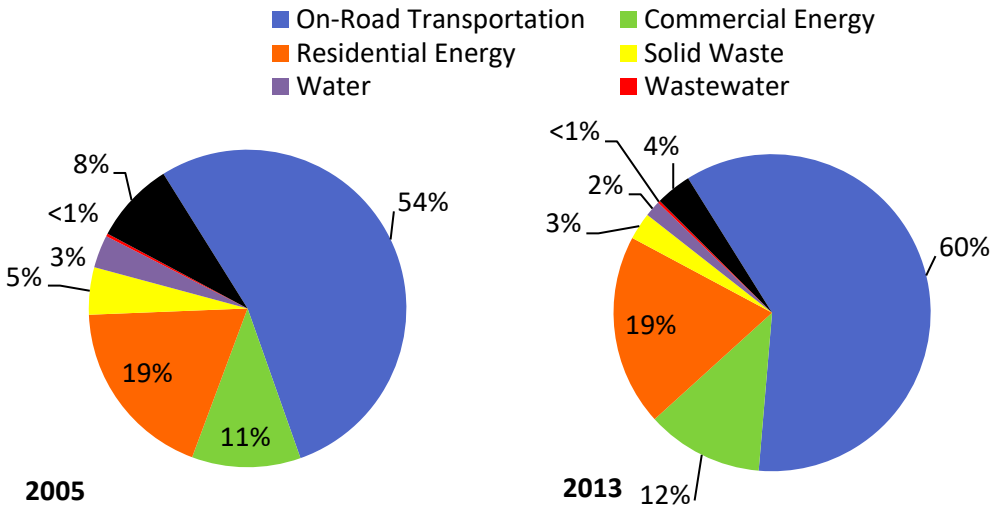

Figure 1. Community GHG Emissions by Sector for 2005 and 2013

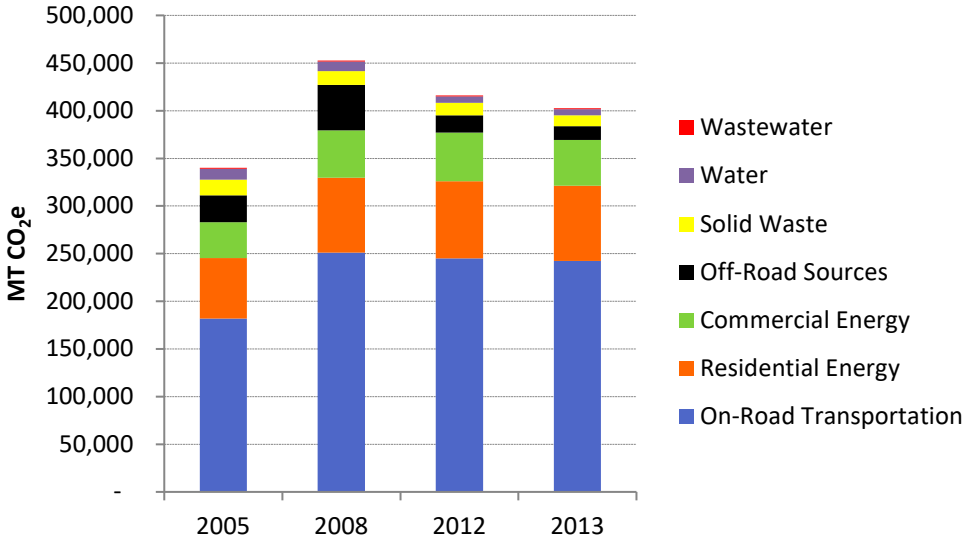

Figure 2. Community GHG Emissions for 2005, 2008, 2012, and 2013

Response to Comment B-26

See Response to Comment B-25.

Response to Comment B-27

As a plan, the SSP needs to meet both the performance targets and efficiency targets. Pages ES-5, 19, 20 of the SSP all identify conforming to mass emissions as the goal of the SSP. This has also be clarified in Chapter 5 (Page 95) of the SSP.

Response to Comment B-28

While the word "shall" may not be predominate, the SSP includes language that requires actions within a specific timeframe. These actions are quantifiable and required in a specific time frame and will facilitate tracking progress on the SSP. The SSP Reduction Goals were restructured to provide requirements as shown in Chapter 3 of the SSP dated December 2019.

Response to Comment B-29

Reductions targets for 2030 are identified throughout the SSP, especially Tables ES-6 and10. 2030 data from these tables was added to each applicable Measure in Chapter 3 of the SSP.

Response to Comment B-30

Complete streets are defined in section 1.0 of the City of Santee's Mobility Element. Cross-sections of specific road types are depicted in Chapter 7 of the Mobility Element. In addition, the City of Santee is working on an Active Transportation Plan that encompasses active

transportation modes in city streets and rights of way.

Response to Comment B-31
This is a citation from the City's Mobility Element. It is not a policy or measure proposed by the SSP.

Response to Comment B-32
Pages 24 through 28 list the Mobility Element policies that are designed to reduce GHG emissions. Some of these policies are listed under action items in a specific Measure. For example, Mobility policy 5.3 involving flexible parking standards in transit oriented development is also the same as the fourth action under Measure6.1 of the SSP

Response to Comment B-33
This comment relates to the City of Santee's Mobility Element. The use of VMT as a traffic congestion tool will not take effect until July 2020 per SB-743 and the currently adopted version of the State CEQA Guidelines.

Response to Comment B-34
A non-contiguous sidewalk is described Section 4.4 of the City's Mobility Element.

Response to Comment B-35
Based on negotiation with Preserve Wild Santee and the Climate Action Campaign, the actions related to ridesharing and the GHG reductions was removed from the SSP as a quantified reduction measure. There are supporting measures in the SSP encouraging rider sharing but not quantified. As examples, the following Supporting Measures have been added to the SSP:

☐ Within six months of adoption of the Sustainable Santee Plan, establish a City webpage dedicated to the Sustainable Santee Plan that provides information to residents, businesses, and project applicants related to the plan, including but not limited to:
  - Programs and incentives to facilitate the installation of EV-chargers;
  - Available ridesharing programs and school bus services and the benefits of both…

☐ On or before December 2020: Conduct a study to evaluate the feasibility of installing EV charging stations on City property."

Response to Comment B-36
Under Energy Efficiency, two subcategories: residential and commercial land uses adequately describe energy efficiency programs of the built and planned environment and the GHG reductions associated with each. No change to the terminology is needed.

The commenter suggested that the plan should address land use densities, like other CAPs. However, the approach used in the SSP is consistent with other CAPS in the region. Land use densities are more appropriately handled in the land use element of the General Plan. The recent City of Oceanside CAP (April 2019) did not discuss densities but rather focused on smart growth areas (3 existing and 3 potential areas). The City of El Cajon's CAP (July 2019) did not discuss land use densities but rather focused on using MTS parking lot for new residential units and creating other incentives for development around transit.

Santee only has one high-quality transit stop. The SSP did include measures and actions that would reduce VMT by encouraging active transportation. Some of these SPP items include:

- Change the zoning ordinance to reduceparking requirements by 10 percent in areas served by transit (Measure 6.1)
- Create additional active transportation routes from the Santee trolley station to

surrounding residential areas (Measure 6.1)
- Expand all types of bicycle routes (Measure 6.2)
- Create a vibrant town center by developing a connected system of multi-modal corridors that encourage people to drive less and walk or bicycle more (Measures 6.1 and 6.2)

Explanation of the GHG Reduction potential methodology has been added to the SSP as Appendix C and are based on performance observed between 2013 and 2017 and other quantifiable data.

Response to Comment B-37
The spelling error identified in the comment has been corrected.

Commenter states that Measure 2.1 is purely voluntary. Revisions to Measure 2.1 was made in the SSP to require new residential development to exceed energy efficiency standards in order to have certainty in the quantified reductions. These modifications read as follows:

"On or before December 2020 require all new residential units including accessory residential units to meet or exceed California Green Building Standards Tier 2 Voluntary Measures. New residential can use Green Building Ratings such as Leadership in Energy and Environmental Design (LEED), Build it Green, or Energy Star certified buildings certification in scoring development."

Response to Comment B-38
Measure 4.1 was also modified to require new commercial units to exceed energy efficiency standards to provide certainty in the GHG reduction values. This action item reads as follows:

"On or before December 2020 require all new commercial units meet or exceed California Green Building Standards Tier 2 Voluntary Measures. New commercial development can use Green Building Ratings such as Leadership in Energy and Environmental Design (LEED), Build it Green, or Energy Star certified buildings certification in scoring development."

Note that the term "Tier 2 Voluntary Measures," comes from the California Green Building Standards. In this case, the City of Santee is making these "voluntary measures,' a requirement for new development.

Response to Comment B-39
The SSP does not include anUrban Forest Management Plan, However, Measure 5.1 requires the City to plant trees along the streetscape and requires development to plant trees within parking areas.

Response to Comment B-40
Note that Measure 6.1 in the February 2019 version of the SSP is now Measure 5.1 in the December 2019 version of the SSP. Trees are also interconnected with complete street programs in the Mobility Element of the General Plan.

Response to Comment B-41
See Response to Comment B-20.

Response to Comment B-42
The City's website includes a link to the SSP together with appendices. Appendix A includes VMT data (Attachment C), which is has been and is currently accessible to the public. Measures related to transportation have been reorganized in the SSP as measures 6.1, 6.2, 7.1, and 8.1 and Appendix C of the SSP includes an in-depth explanation and quantification

of the GHG reduction potential. In addition, the timing of specific actions under all of the measures have been added to add surety to the SSP.

Response to Comment B-43
Parking is addressed in Measure 6.1 on Page 41 of the SSP.

Response to Comment B-44
The City cannot commit to cash bonuses to employees who use non-automotive forms of transportation or EV. As stated in the action under Measure M-4.2 of the SSP, the City could only develop "non-monetized" incentives.

The comment appears to want to charge employees to park at City Hall. Presumably the public would not be charged a parking fee. Employees would then be incentivized with a cash bonus if a parking permit was not purchased or the fee significantly reduced for electric vehicle users.

Charging for employees to park in a relatively low density neighborhood is economically infeasible, would divert cars to the surrounding neighborhood, would require an enforcement mechanism and/or the addition of gates to City Hall, and would create an unfairness issue between the employees and the citizens they serve.

Response to Comment B-45
Actions under Measure 6.1 of the SSP encourage use of transit, including Trolley. These actions include creating additional routes from transit station to residential areas and re-evaluating parking requirement in areas served by transit.
While the City would work with MTS to optimize Trolley routes, schedules, and boarding/ access procedures, there are areas outside of the City of Santee's control.

Response to Comment B-46
Both SR-52 and SR-125 are state routes and run through multiple jurisdictions in San Diego County. Traffic on these freeways is mostly pass-through traffic, which means the origin and destination of the trip are both outside the City boundary. As discussed in Appendix A (IFT Report) of the SSP, because the City has no control over pass-through trips, they are not counted toward the City's VMT and do not contribute to the City's GHG emissions.

The commenter wanted the City to consider strategies for these freeways, that do not induce VMT. SANDAG and MTS have no immediate plans to add bus lanes or transit to SR-52 and SR-125. In addition, SANDAG and MTS have no plans to expand the light rail system ("Trolley") to points further north or east.

Response to Comment B-47
The SSP is a plan to reduce GHG emissions within the City of Santee. The City of Santee has no control over land use decisions made by the County of San Diego and other nearby jurisdictions.

Response to Comment B-48
On October 8, 2019, City Council voted unanimously to move forward with a Community Choice Aggregation Program. The 100% renewable goal by 2035 is the same goal as the City of Santee's partner in the CCA process (Chula Vista and La Mesa). The feasibility study has been completed with this goal. Therefore this goal must remain as 2035.

Response to Comment B-49
In negotiations with the Preserve Wild Santee and the Climate Action Campaign, the City of Santee has removed the Screening Tables from the SSP and replaced them with a CAP Consistency Checklist. Therefore, the 100 point system is no longer part of the SSP.

Response to Comment B-50
The City disagrees with the commenter's assertion that any amount of greenhouse gas emissions is a cumulatively significant impact under the California Environmental Quality Act. Appendix G of the State CEQA Guidelines identify two thresholds for determining the significance of greenhouse gas emissions: (1) will the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or (2) will the project conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Air quality management districts have proposed and in some cases adopted bright-line thresholds for determining whether an individual project's greenhouse gas emissions will have a significant impact on the environment – the City is not aware of any air quality management district that has adopted a bright-line threshold of zero. Regardless, here, "the project" for purposes of CEQA is the SSP, which will reduce, not increase, emissions in the City of Santee. As determined by the PEIR, greenhouse gas emissions impacts associated with adoption of the SSP will be less than significant.

Response to Comment B-51
See Responses to comments B-102 through B-108 and comment I-30.

Response to Comment B-52
The City is committing to the measures in the SSP, including all municipal reduction measures.

Response to Comment B-53
See response to comment B-14. The same table is used in Table ES-7 and Table 11.

Response to Comment B-54
Typographic error on Page 50 (previous version was page 72) of the SSP has been corrected to show the GHG Reduction Potential date as year 2030.

Response to Comment B-55
Table 13 of the SSP is revised as depicted below:

TABLE 13 **Municipal Emissions and Targets Comparison**

	2005	2020	2030	2035
	MT CO_2e	MT CO_2e	MT CO_2e	MT CO_2e
BAU Emissions	1,657	1,948	2,003	2,031
Reduction Target	--	--	994	845
State and Federal Reductions	--	337	346	350
Local Energy Efficiency Reductions	--	--	264	1,054
Total Adjusted Emissions	--	1,611	399	627
Additional Reductions Needed	--	--	Target Met	Target Met

Notes and Acronyms:
BAU = Business as Usual MT CO_2e = metric tons of carbon dioxide equivalent

Response to Comment B-56
References supporting the quantification of GHG reductions from municipal measures are provided in the footnotes under each measure on Pages 57 through 69.

Response to Comment B-57
It is the commenter's opinion that warming in the range of 3 to 12 degrees Fahrenheit is catastrophic and that there is no evidence that humans could adapt to such a change. By

inference, the commenter indicates that no adaptation measures should be attempted. However, the City must follow state regulations and direction. Executive Order B-30-15 directs state agencies prepare adaptation measures to prepare for uncertain climate impacts. The adaptation chapter is Santee's plan to adapt to an uncertain climate future.

Response to Comment B-58
Cooling centers were addressed on Page 66 of the December 2019 version of the SSP. In addition, GHG reduction Measures related to transportation will help facilitate the movement of the most vulnerable populations to these cooling centers.

Response to Comment B-59
The State of California's Office of Statewide Health Planning and Development (OSHPD) provides oversight to hospitals and care facilities. This agency already requires emergency generators for hospitals and care facilities.

Response to Comment B-60
The following strategy is added to the Public Health & Safety section on Page 66:

> Use reverse 911 call to notify residents of serious heat events or natural disasters, and encourage residents to register into the "AlertSanDiego" system.

Response to Comment B-61
The last paragraph on Page 67 of the SSP is revised to:

> … The San Diego County Water Authority (SDCWA), the wholesale supplier to San Diego County, expects demand to increase 22 percent between 2009 and 2035. The water agency serving the City, Padre Dam Municipal Water District, also sets water demands goals through 2035 consistent with SB X7-7 in the Urban Water Management Plan. SDCWA provided potential actions that may be taken in a drought situation in the Water Shortage and Drought Response Plan.

Response to Comment B-62
The commenter recommends that the City provide incentives for improvements that both increase fire safety and reduce energy use to homes in high/very high fire severity zones. These homes are generally larger and located on larger lots, and presumably owned my more affluent citizens. A policy that provides incentives to wealthier elements of the community might become a social equity issue.

The second strategy under Infrastructure Damage on Page 68 of the SSP is revised to:

> Prioritize and plan for infrastructure improvements that increase fire safety and reduce energy, especially in vulnerable neighborhoods.

Response to Comment B-63
The comment does not relate to reduction of GHG emissions and is therefore outside the scope of the SSP.

Response to Comment B-64
See Chapter 3 and Appendix C of the SSP.

Response to Comment B-65
Staffing decisions will be made by the City Manager after adoption of the SSP.

Response to Comment B-66
Table 14 on Page 73 of the SPP lists current funding sources.

Response to Comment B-67
In Chapter 3 of the SSP, the Goals and Reduction Measures were revised to include Performance Metrics that outlines the reasonable process and timing of the actions. There is

no requirement to issue a final implementation plan for the SSP. Upon adoption, the City commits to an annual report that details the status of all measures in the SSP (Page 78 SSP).

Response to Comment B-68
See Response to Comment B-67. In addition the City commits to an updated inventory every 3 years starting in year 2021.

Response to Comment B-69
Table 3.10 of the PEIR describes the relationship of the SSP to the General Plan.
There is no requirement for a GHG reduction plan to be part of the General Plan (CEQA Guidelines, Section 15183.5(b))
Applicable Measures are quantified. Supportive Measures are not assigned a GHG reduction value. The SSP is designed to be monitored and reported (see Responses to Comments B-67 and B-68). Also refer to Response to Comment B-66 on funding.

Response to Comment B-70
This comment in placed under a heading entitled "Executive Summary." A full description of each individual reduction measure is included in Chapter 3 of the SSP.

Response to Comment B-71
See Responses to Comments B-4, B-5, and B-48.

Response to Comment B-72
See Response to Comment B-68.

Response to Comment B-73
The purpose of the discussion on pages 3-17 through 3-26 of the PEIR is to illustrate the relationship between the General Plan and the SSP, and explains that the SSP implements the goals and policies of the General Plan. As shown in Table 3.10, several objectives and policies of the General Plan provide a framework for the most specific goals of the SSP. However, the SSP is not a part of the General Plan, and is not required to specifically quantify reductions of each General Plan objective or policy, nor is the City required to tie each General Plan objective and policy to a mitigation measure in order to assess the potentially significant impacts of the SSP.

Response to Comment B-74
Table 4.2.E has been clarified to note that Lines 11- 14 denote the defenses in daily pollutant emissions between those expected under a BAU scenario and those expected with the SSP. It is not the arithmetic difference between 2005 and 2035. It is the emission reductions of the SSP compared to the business-as-usual level with the implementation of the SSP, showing as negative emissions. This means that with the SSP emissions are reduced. The last two sentences of the first paragraph on PEIR Page 4.2-17 is revised to:

> Table 4.2.E presents a summary of the peak daily emissions for the Sustainable Santee Plan baseline year 2005, forecast year 2035 under business-as-usual scenario, and changes in emissions ~~between baseline year and forecast years~~ with the implementation of the Sustainable Santee Plan. The CalEEMod and OFFROAD2007 model outputs and calculations are provided in Appendix C, Air Quality Analysis Memo.

Response to Comment B-75
The air pollutants emissions from the transportation sector are shown in the PEIR, Table 4.2.E in "Mobile" rows. As discussed under Response to Comment B-74, Table 4.2.E shows emissions in 2005 baseline year and 2035 under business-as-usual scenario, and emission reductions in 2035 with CAP implementation. Chapter 4.2 of the PEIR discusses project impacts to air quality based on the current CEQA Guidelines.

Response to Comment B-76

. Section 4.3.7 of the PEIR notes that any future development using the SSP would have to conform with City's regulations and requirements including the MSCP. The impact of the SPP was evaluated as having a less than significant impact on biological resources.

Response to Comment B-77

Carbon sequestration is not a GHG reduction strategy, rather it is a strategy to "soak up" man's GHG emissions. In the SSP, carbon sequestration is a supporting measure. Because impacts are determined to be less than significant, additional mitigation measures are not required.

Response to Comment B-78

The SSP is a plan for reducing man-made GHG emissions reductions. Preserving existing Coastal Sage Scrub or Chaparral does not reduce man-made GHG emissions, they merely sequester it. Therefore, the absorption of CO_2 by Coastal Sage Scrub or chaparral is not relevant to reduction in GHG emissions.

Response to Comment B-79

There is only one Table 4.4.K, that is split over two pages. Revised values were added to Table 4.4.K as shown below:

Table 4.4.K: Community Emissions and Targets Comparison

	2005 MT CO_2e	2020 MT CO_2e	2030 MT CO_2e	2035 MT CO_2e
BAU Emissions	339,972	432,982	486,170	515,462
Reduction Target	—	--	249,596	173,386
State & Federal Reductions	—	80,876	146,656	178,919
Local Reductions excluding CCA	—	-- ~~92,569~~	~~133,135~~ 73,290	~~153,418~~ 107,723
Local Reductions including CCA	—	-- ~~259,537~~	~~206,379~~ 179,457	~~183,125~~ 164,655
Total Adjusted Emissions excluding CCA	—	352,106~~-259,537~~	266,219~~-206,379~~	~~183,125~~ 228,820
Total Adjusted Emissions including CCA	—	352,106~~-259,537~~	219,897 ~~160,057~~	~~132,993~~ 171,888
Additional Reductions Needed without CCA	—	~~Target Met~~	Target Met	~~9,739~~ 55,434
Additional Reductions Needed with CCA	—	~~Target Met~~	Target Met	Target Met

BAU = Business as Usual MT CO_2e = metric tons of carbon dioxide equivalent

Response to Comment B-80

The language in thelast paragraph on Page 4.4-14 of the PEIR has been clarified to include the revised California Air Resources Board, SB 375 goals:

> **Senate Bill 375.** Senate Bill 375, signed into law on October 1, 2008, is intended to enhance the ARB's ability to reach AB 32 goals by directing it to develop regional greenhouse gas emission reduction targets to be achieved within the automobile and light truck sectors for 2020 and 2035. The targets are required to consider the emission reductions associated with vehicle emission standards (see Senate Bill 1493), the composition of fuels (see Executive Order S-1-07), and other ARB-approved measures to reduce GHG emissions. In late September 2010, the ARB announced greenhouse gas reduction goals for implementation by regional land use and transportation agencies. Table 4.4.E shows the 2010 reduction goals that were effective through September 30, 2018, as well as updated goals effective beginning October 1, 2018~~the ARB proposed updates from June 2017. These updated targets will take effect in 2018, if approved~~. As shown below, the regional emissions reduction goal for San Diego is ~~7~~15 percent by 2020 and ~~16~~19 percent ~~(19 percent proposed)~~ by 2035 compared to 2005 emissions levels.'

Note: The associated table already contained these revised numbers.

Response to Comment B-81
See Response to Comment B-80.

Response to Comment B-82
The following actions under various measures of the SSP, demonstrate clear and "actionable" items designed to reduce VMT and on road transportation emissions as follows:

From SSP, Measure 6.1 on Page 41:

"Starting in 2020 with completion by 2030 the City will construct a total of 25 miles of active transportation routes (sidewalks and pedestrian paths) from Santee Light Rail Transit station to surrounding residential areas. The City will amend its zoning ordinances to require commercial centers within ¼ mile of the Santee Light Rail Transit station to reduce parking spaces by 10 percent from current zoning requirements."

From SSP, Measure 6.2 on page 41:

"Starting in 2020 with completion by 2030 the City will expand bike routes to improve bike transit by increasing Class 1 Bike Path from 2.0 miles to 15.5 miles, Class 2 Bike Lane from 14.5 miles to 34.3 miles, and Class 3 Bike Route from 9.3 miles to 21.7 miles, which would implement City of Santee Bicycle Master Plan."

From SSP, Measure 7.1 on Page 42:

"On or before December2020 the City will require all new residential and commercial development to install e-chargers. For new Single Family Residential Install complete 40 Amp electrical service and one e-charger, for new Multi-family Residential install e-chargers for 13 percent of total parking, for new Office Space, Regional Shopping Centers, and Movie Theaters, install e-chargers for 5 percent of total parking spaces, and for new Industrial and other Land Uses employing 200 or more employees install e-charges for 5 percent of total parking spaces."

Response to Comment B-83
Executive Order B-55-18 required the California Air Resources Board ("CARB") to develop a framework for accounting that tracks the progress of the carbon neutrality goal of EO B-55-18. The Executive Order also notes that all carbon neutrality plans shall seek to improve the air quality, health and economic resiliency of communities while supporting climate adaptation and bio-diversity. The SSP is a good first step toward achieving the carbon neutrality goal of of EO B-55-18. It provides an overarching structure toward reducing GHG emissions. The plan also includes adaptation strategies and incorporate measures to improve air quality, health, and economic resiliency, which are all part of EO B-55-18. Since no system, framework or accounting system has been established by CARB (as of July 29, 2019) to track carbon neutrality, it would be premature to incorporate specific actions in the SSP. However, the SPP foes establish reduction measures that will lead to carbon neutrality.

In addition, EO B-55-18 seeks to achieve carbon neutrality by the year 2045. This date is 10 years after the horizon year of the SSP. Many of the GHG emission reduction measures will lead to carbon neutrality in the future, Future versions of the SSP will be able to incorporate CARB-developed procedures, practices, and accounting practices that are presumably under development. The City has committed to continuing to update the SSP on a regular basis and intends to continue reducing emissions beyond 2035 as described in the "Next Steps" section of Chapter 5. Also see the response to comment B-5.

Response to Comment B-84
The SSP has documented a clear path of GHG emissions reductions consistent with State Goals.

Response to Comment B-85

See Response to Comment B-83

Response to Comment B-86

See Response to Comment B-4.

The recently adopted changes to the CEQA Guidelines included four issues related to wildfire. These are:

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

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

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

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

The commenter did not provide evidence that mitigation under any of these issues would be required. Note that this addition to the CEQA Guidelines occurred in late 2018 over a year after the publication of the NOP for this project on August 17, 2017.

Response to Comment B-87

This comment relates to thresholds 4.7.2 and 4.7.4 which are reiterated below:

Threshold 4.7.2: 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?

Threshold 4.7.4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

While the comment suggests that the SSP will exceed Threshold 4.7.2, the comment does not explain how or why. Threshold 4.7.2 asks whether a project would expose project occupants to pollutant concentrations resulting from wildfire. Section 4.7.6 of the Draft PEIR explains that the rationale for determining that the SSP would have a less than significant impact on wildfires. As discussed in the Draft PEIR, future development projects undertaken to implement the SSP would be subject to all applicable local and state regulations and review processes to address wildfire risks. Further, the SSP itself includes several wildfire resistive measures, including additional insulation requirements, and reduced vehicle trips, which will in turn reduce spark incidence. No specific aspects of the SSP will alter existing slope, prevailing winds, or another other factors that would increase exposure of Santee residents to increased pollutants caused by wildfire, and the comment does not identify any aspects of the SSP that the commenter believes would alter these existing conditions. In addition, Page 82 of the SSP discusses wildfires as part of the adaptation chapter. The SSP, by definition, would reduce the amount of man-made GHG emissions. If, as the commenter suggests, there is a linkage between GHG emissions and wildfire, then the SSP's GHG reductions would lessen the risk of wildfire. Therefore, the SSP would have a less than significant impact on wildfire. An accelerated reduction, as proposed by the commenter, would also have a less than significant impact.

Response to Comment B-88

This comment relates to threshold 4.7.1 which is reiterated below:

Threshold 4.7.1: Substantially impair an adopted emergency response plan or emergency evacuation plan?

The comment suggests that the SSP will increase the risk of wildfires, but does not provide

any substantial evidence supporting such a conclusion. As discussed above in RTC B-87, the SSP includes several wildfire-resistive measures, and is anticipated to reduce, not increase, the risk of wildfires. Further, the SSP does not affect, inhibit, or alter emergency evacuation plans. Finally, the comment specifically states that the SSP will exceed Threshold 4.7.4, which specifically deals with downstream flooding and landslides. As discussed in the Draft PEIR, there are no aspects of the SSP that would result in increased runoff, post-fire slope instability, or changes in drainage patterns, and nothing in the comment suggests otherwise. Any development project implementing the SSP would be subject to all building codes and development standards in effect to control for runoff, instability, and drainage. The SSP is a policy document that would not substantially impair an adopted emergency response plan. This is discussed in Section 4.7.6 of the Draft PEIR.

Response to Comment B-89

The recently adopted changes to the CEQA Guidelines included four issues related to wildfire. These wildfire issues are addressed in Chapter 4.7 of the PEIR. These thresholds of significance are:

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

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

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

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

The above threshold were evaluated to be less than significant impact.

Response to Comment B-90

Section 5.4.2 of the PEIR discusses the Accelerated Reduction program which would implement the State's 2050 goal by 2030 and would work towards the goal of carbon neutrality by 2045. Alternative 2 would reduce impacts quicker than the no-plan alternative and the SSP, however it would result in significant and unavoidable impacts due to the larger renewable energy projects and other measures needed to meet this more aggressive GHG reduction timeline. The City has neither the land nor financial resources to build renewable energy projects to offset GHG emissions.

Response to Comment B-91

See Response to Comment B-90.

Response to Comment B-92

The City requires trees and has adopted a Tree Ordinance. In addition, the SSP states that "On or before December 2020, the City would update the official street tree list" which will take into consideration drought tolerant and native trees. This is a Supporting Measure listed on Page 56 of the SSP. Water conservation, urban heat island effect, active transportation, and fire risks would all be considered as the tree list is developed.

The commenter has provided no evidence to support his claim that the Very High Fire Hazard Severity Zone would extend into the "heart of the city."

Response to Comment B-93

See Response to Comment B-94

Response to Comment B-94
Larger renewable energy projects would be needed to accelerate towards of carbon neutrality earlier than 2045 in the Project Alternative commented upon. Providing 100% renewable energy earlier that 2045. In order for the City of Santee to be carbon neutral earlier than 2045 would require large renewable energy projects as well as using 100% renewable energy for transportation, water, solid waste hauling etc. Since transportation, water, and solid waste hauling may use carbon-fueled vehicles for some time, large renewable project must be built to offset these GHG emissions in order to achieve neutrality. The City does not own large pieces of land for such projects and currently lacks the funding for such projects. The aesthetics section of the PEIR's alternatives analysis (Page 5-7) describes why describes why larger renewable projects would be required to achieve carbon neutrality on the timeline proposed for Alternative 2. The early adoption of Carbon neutrality described in Alternative 2 in feasible due to the lack of large parcels of City-owned property and the lack of City funds.

Response to Comment B-95
The proposed project does not result in cumulatively considerable greenhouse gas emissions. All impacts of the SSP are already mitigated to a less than significant level.

Response to Comment B-96
Each SSP measure contains actions that are specific and have time lines for accomplishment. Supporting measures are clearly identified and are assigned no GHG emission reduction value. The City has committed to annual reporting and updating the GHG inventories every 3 years. The SSP is intended to be a living document that can adapt to new regulations and changes in climate science.

Response to Comment B-97
As described above, within the SSP, and within the PEIR, the SSP provides a plan for reducing greenhouse gas emissions. As determined by the PEIR, adoption and implementation of the SSP will not result in any significant and unavoidable impacts requiring further mitigation.
The comment also expresses support for Alternative 2, and such a statement does not require a response.

Response to Comment B-98
See Response to Comment B-4.

Response to Comment B-99
Reference to mobile source emissions document has been added to other references on Page C-5 of Appendix C of the SSP.

Response to Comment B-100
Pages 78 through 79 of the SSP, document the tracking and reporting requirements for the SSP. This includes tracking individual projects to ensure adequate GHG reductions are being achieved. The SSP also requires the development of annual SSP implementation status reports that would be presented to the City Council (Page 78). Page 78 of the SSP also commits the City to conduct revised inventories every 3 years. The inventories will be used to verify GHG reductions and will be employed to update measures / actions as necessary to ensure progress towards the State targets.

Response to Comment B-101
See Response to Comment B-20.

Response to Comment B-102
The City has replaced the Screening Tables with a Consistency Checklist to ensure that all new development complies with the SSP. Because the Screening Tables are no longer part

of the SSP, The calculation of point values are no longer relevant to the SSP.

Response to Comment B-103
The City has replaced the Screening Tables with a Consistency Checklist to ensure that all new development complies with the SSP. Because the Screening Tables are no longer part of the SSP, The calculation of point values and the correlation to the new building and energy codes are no longer relevant to the SSP.

Response to Comment B-104
See response to comment B-105.

Response to Comment B-105

The City has replaced the Screening Tables with a Consistency Checklist to ensure that all new development complies with the SSP. Because the Screening Tables are no longer part of the SSP, The TBD point values are no longer relevant to the SSP.

Response to Comment B-106
The comment challenges the use of Screening Tables in being able to accurately quantify the GHG reductions associated with the point values and choices applicants of new development make within the Screening Tables. However, the Screening Tables have been replaced with a Consistency Checklist that ensures new development projects are within the land use allocations of the General Plan (or Land Use Buffer) and that each development project implements the required reduction measures listed in the SSP. Because the Screening Tables are no longer a part of the development review process within the SSP, the issues raised in this comment are no longer relevant to the December 2019 SSP.

Response to Comment B-107
The checklist in Appendix C of the SSP has been updated with the most recent language from Section 21155(a) through (c) of the Public Resources Code.

Response to Comment B-108
See response to comment I-30.

Letter B - Attachment

Note:

The letter from Preserve Wild Santee (Letter B) included a 2,204 page attachment

containing 53 documents relating to climate change and wildfires. These documents included a Ninth Circuit Court of Appeals case (Case Number 18-36082), published scientific and popular articles and portions of articles, relating to climate change and wildfire.

None of the documents in this attachment mentioned the Sustainable Santee Plan or its Program Environmental Impact Report.

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Letter C

Dennis Seider
Climate Leaders Toolkit
8870 Echo Dr
La Mesa, CA 91941

619-750-4923
619-741-3235
dennis@climateleaderstoolkit.com

April 28, 2019

John O'Donnell
Santee Principal City Planner
10601 Magnolia Avenue
Santee, California 92071

Dear Mr. O'Donnell

C-1

I read the draft of Santee's Climate Action Plan with great interest and gratification. It was a real pleasure to see the local data on climate change laid out so carefully and clearly for public review. The plan will be an asset for your constituents in Santee as they, along with the rest of us, continue to grapple with this enormous challenge.

My partner Hector Valtierra and I set up the Climate Leaders Toolkit expressly for the purpose of assisting cities and counties in designing and implementing their climate action plans in California.

Our analysis of Santee's plan would suggest that we can be of assistance. In particular, we see the plan as needing more development in how it leverages resources from the local business community. While the focus on city properties and symbolic leadership are important, from our perspective, these funds bolstered with incentivizing regulation can better be spent partnering with the private sector to invite deeper investment and a more organic community response.

We would like to meet with you to discuss this idea in more detail.

Sincerely,

Dennis Seider

Partner
Climate Leaders Toolkit

RESPONSE TO COMMENT LETTER C –
04/28/19 CLIMATE LEADERS TOOLKIT

Response to Comment C-1

The City would consider and assess the feasibility of partnering with Climate Leaders Toolkit on implementing the Sustainable Santee Plan after the plan is adopted.

Letter D

County of San Diego

MARK WARDLAW
DIRECTOR

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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

April 29, 2019

John O'Donnell
Principal Planner
Development Services Department
City Hall, Building 4
10601 Magnolia Avenue
Santee. CA 92071

RECE VED
APR 2 9 2019
CITY OF SANTEE

Via e-mail to: jodonnell@cityofsanteeca.gov

REQUEST FOR COMMENTS ON THE SUSTAINABLE SANTEE PLAN: THE CITY'S ROADMAP TO GREENHOUSE GAS REDUCTIONS (SCH#2017081030) FOR THE CITY OF SANTEE

Dear Mr. O'Donnell,

The County of San Diego (County) reviewed the City of Santee's (City} Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions (Project), received on March 22, 2019.

The County appreciates the opportunity to review the Project and offers the following comments for your consideration. The County previously submitted a letter on the Santee Sustainable Plan (Attachment A), and a letter on the City's Mobility Element Update (Attachment 8). Please note that these comments should not be construed as County support for this Project.

TRANSPORTATION/TRAFFIC

1. The Project is intended to "provides policy direction and identifies actions the City and community will take to reduce the generation of GHG emissions consistent with the State of California goals and targets".

D-1

a. The City should establish the **Mast** Boulevard connection consistent with the County's Mobility Element, which would provide a direct path of travel for travelers. The connection will fulfill the intent of the Sustainability Plan to reduce GHG emissions by providing a missing transportation connection, promoting bicycle and pedestrian travel, and by eliminating out of direction automobile travel caused by the current gap in the network.

ENERGY-RELATED MEASURES

1. Electric Vehicle Charging Stations (EVCS)

D-2

a. Measure M-4.4 proposes to develop and implement a plan to install EVCS on municipal property. The objective is to increase number of City employees driving EVs.

D-2 Continued

b. Measure 7.4 proposes increasing EV use in the community. The City can strengthen this measure by identifying priority areas for electric vehicle chargers.

c. The County is committed to improving the availability of EVCS throughout the region and is interested in collaborating with the City on strategic placement of new charging infrastructure.

D-3

2. Measure 2.1 (Energy Efficient Home) and Measure 1.4 (Residential Home Energy Renovations) propose establishing an online permitting process. The County recommends that the City utilize SolSmart, an organization led by the International City/County Management Association and The Solar Foundation. as a resource to evaluate programs and practices that impact solar markets, and identify opportunities. The County of San Diego has an online permitting system for solar PV installation, and is a designated as a Gold level So1Smart community.

SOLID WASTE MEASURES

D-4

1. State legislation requires organic waste diversion from landfills with State targets of 50% below 2014 levels by 2020 and 75% below 2014 levels by 2025. By specifying actions on organic waste reduction, collection, and education and outreach, the City can achieve its waste diversion goal of 90% waste diversion by 2035 as well as meet state goals. The County's Strategic Plan to Reduce Waste establishes a 75% waste diversion target by 2025 in the unincorporated areas. The County's Climate Action Plan increases the target to 80% solid waste diversion by 2030. This measure can be an opportunity for the two jurisdictions to coordinate on efforts to achieve solid waste and organic materials diversion goals.

WATER CONSERVATION MEASURES

D-5

1. A proposed action under Measure 5.2 is to promote rainwater harvesting through rebates and demonstrations. The County, though partnership with the County Water Authority and Metropolitan Water District of Southern California has had immense success in providing rebates for rain barrel and rain barrel sales events. This measure can be an opportunity for the County to collaborate with the City on implementation efforts.

PARKS AND RECREATION

D-6

1. One of the primary methods in GHG reductions outlined in the plan is tree planting. The Department of Parks and Recreation, Resource Management Division, works in our preserves to expand tree planting as part of the County's Tree Planting Program. It would be beneficial that the Project include a discussion of County partnership with the City in tree planting in the City and in adjacent preserve areas.

D-7

a. One of the primary methods the City proposed to reduce GHG is walkability. Will the Project include as GHG reduction strategies connections from proposed residential developments (as planned for in the current Notice of Preparation for the Fanita Ranch development) to adjacent open space areas and trail systems?

2. The Project's Initial Study (August 2017) states that the DPEIR will include a comprehensive discussion of how the Project implementation will mitigate for impacts related to the Multiple Species Conservation Program (MSCP) and other habitat conservation plans.

D-8

a. The DPEIR Biological Resources section 4.3.7 analysis of impacts related to MSCP and other habitat conservation plans is not sufficient. As the City MSCP is drafting its MSCP Subarea Plan and potential impacts are not certain, it would be beneficial to also discuss in the DPEIR Biological Resources Analysis Section 4.3.7 potential impacts as a result of Project implementation to biological resources

D-8
Continued

and habitat conservation plans located within the City and adjacent to the City. This includes the adopted County MSCP Subarea Plan Core Resources Areas, particularly the Mission Trails-Kearny Mesa-East Eliot-Santee Core Resource Area, which transects the City and covers Mission Trail Regional Park and adjacent County Preserves, including Goodan Ranch/Sycamore Canyon Preserve. There needs to be a discussion of how Project implementation may have potential impacts to the County Subarea Plan MSCP Core Resources Area, particularly the Mission Trails-Kearny Mesa-East Elliot-Santee Core Resource Area, as it is partially located within the City and which are considered to be critical biological resource areas.

The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance, at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner, at (858) 495-5468, or via e-mail at timothy.vertino@sdcounty.ca.gov.

Sincerely,

//s//

Eric Lardy, AICP
Chief, Advance Planning Division
Planning & Development Services

Enclosure: Attachment A-2017-09-19 Sustainable Santee Plan COSD Comment Letter
Attachment B-2017- 08-31 Mobility Element Update COSD Comment Letter

E-mail cc: Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Mel Millstein, Group Program Manager, LUEG
Lara Barrett, CAO Staff Officer, LUEG Emmet
Aquino, Park Project Manager, DPR
Marcus Lubich, Sr. Park Project Manager, DPR
John Holder, Land Use/ Environmental Planner, DPR

Letter D - Attachment

Attachment A

County of San Diego

MARK WARDLAW
DIRECTOR

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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

September 19, 2017

RECEIVED
APR 29 2019
CITY OF SANTEE

John O'Donnell
Principal Planner
Development Services Department
10601 Magnolia Avenue
Santee, CA 92071

Via e-mail: jodonnell@CityofSanteeCa.gov

RESPONSE TO COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE SUSTAINABLE SANTEE PLAN

Dear Mr. O'Donnell,

The County of San Diego (County) reviewed the City of Santee's (City) Notice of Preparation of a Draft Program Environmental Impact Report (PEIR) for the Sustainable Santee Plan dated August 15, 2017 (Project).

The County appreciates the opportunity to review the Project, and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

BIOLOGICAL RESOURCES

1. The draft Initial Study for the Project indicates that there could be potential significant impacts to biological resources as a result of implementation of energy production facilities. The Initial Study implies that an analysis will be conducted regarding potential impacts to Habitat Conservation Plans (HCPs) in accordance with CEQA Guidelines. The County agrees that an analysis should be completed to address these potential impacts.

2. The County has a Multiple Species Conservation Program (MSCP), which includes one adopted Plan covering the southern portion of the County (South County Plan). In addition, the County is currently working on preparing an MSCP Plan to cover the northern portion of the County (North County Plan), and will receive future direction on an MSCP Plan for the eastern portion of the County (East County Plan) once the North County Plan is significantly underway. The County requests that the City consider the existing South County Plan and preliminary draft North County Plan and preliminary draft map for the East County Study Area as part of the EIR analysis. Information regarding all three efforts is available on the County's website at the following address: http://www.sandiegocounty.gov/pds/mscp/.

See Comment D-8

3. As demonstrated in mapping for the South County Plan the eastern edge of the City is located adjacent to County lands that are included within the South County Plan. The County requests that potential impacts to adopted HCPs that could result from implementation of the proposed project specifically

wildlife corridors or other biological resources that may exist between County lands and lands within the City. Information regarding the South County Plan is available at the following address: http://www.sandieqocounty.gov/content/dam/sdc/pds/mscp/docs/mscpareas.pdf.

TRANSPORTATION/TRAFFIC

See Comment D-1

1. The Project is intended to "provide policy direction and identify actions the City and community will take to significantly reduce the generation of greenhouse gas emissions (GHGs) consistent with California AB 32 and EO S-3-05". The City should implement the Mobility Element Mast Boulevard connection to the County segment to provide a direct path of travel for travelers. The connection will fulfill the intent of the Sustainability Plan to reduce emissions by providing a connection for bicycle and walk travel and by eliminating out of direction automobile travel caused by the current gap in the network.

WASTEWATER

D-9

1. Based on the information provided in the NOP, it appears there could potentially be an impact to District trunk sewer line. Because the Sustainability Plan includes the entire municipal boundary, the project scope traverses the District trunk sewer line (Attachment A). Once individual projects are proposed by the City, the District will need to conduct a site-specific and more thorough analysis to ensure the existing underground wastewater infrastructure is not impacted.

The County looks forward to receiving future documents and/or notices related to this Project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Timothy Vertino at 858-495-5468 or by e-mail at timothy.vertino@sdcounty.cagov.

Sincerely,

MARY KOPASKIE BROWN. AICP, MCIP
Chief, Advance Planning Division
Planning & Development Services

Attachments: Attachment A: Trunk Sewer Line Location Map

E-mail cc: Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Vincent Kattoula, CAO Staff Officer, LUEG
Crystal Benham, Land Use/ Environmental Planner, PDS
Jeff Kashak, Environmental Planner, DPW
Everett Hauser, Transportation Specialist, PDS

Letter D - Attachment

Attachment B

Elements of this attachment to letter D relate to comment D-1

County of San Diego

MARK WARDLAW
DIRECTOR

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August 31, 2017

Michael Coyne
Associate Planner
City of Santee Department of Development Services
10601 Magnolia Avenue
Santee, CA 92071

Via e-mail: mcoyne@cityofsanteeca.gov

RESPONSE TO COMMENTS ON A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF SANTEE'S MOBILITY ELEMENT UPDATE

Dear Mr. Coyne,

The County of San Diego (County) reviewed the City of Santee's (City) Notice of Availability of a Draft Program Environmental Impact Report (DPEIR) for the Mobility Element Updijte dated July 13, 2017.

The County appreciates the opportunity to review the City's Mobility Element Update and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

TRANSPORTATION/TRAFFIC

1. The Project goal of the Mobility Element is "a *balanced, interconnected, multimodal transportation network'.* DPEIR Figure 2-5 - Existing Bicycle Facilities, identifies an existing gap in the Class II Bike Lane Network with the existing gap of Mast Boulevard. The proposed Mobility Element network will impact connections, therefore creating a conflict with the stated goal of an interconnected network for all users of the Mobility Element.

2. DPEIR pg. 3-20 *"Option 2- Extend Mast Boulevard from its current eastern terminus point in Santee to the western terminus point in the County of San Diego (Lakeside)",* which would be constructed/extended as a new Four-Lane Major Arterial Roadway. The Mast Boulevard Option 2 is the County's preferred option and consistent with the County's Mobility Element Plan.

3. DPEIR pg. 4-49 *"Level of Significance Prior to Mitigation"* identifies additional cumulative impacts to Woodside Avenue in the City of Santee, while there is not a cumulative impact identified under the "Mast Boulevard Extension Option". A summary table in Section 4.6 of the DPEIR identifies the direct and cumulative traffic impacts of each alternative and may help to identify the differences between the alternatives.

4. Mitigation Measure - C - TRA-3 - *Widen Pepper Drive between Graves Avenue and Churchill Drive"* indicates that the City of Santee shall work with the County of San Diego through fair share contributions to acquire additional right-of-way (ROW) and widen the roadway segment of Pepper Drive between Graves Avenue and Churchill Drive to a four-lane Secondary/Arterial Collector. Pepper Drive

is classified as a two-lane (2.2C) Light Collector in the County's Mobility Element Plan, which is inconsistent with the City's four-lane Secondary/Arterial Collector classification.

5. Traffic Impact Study - Table 6.3 identifies that the Mast Boulevard extension is projected to carry over 15,000 vehicles per day and provide regional connectivity. The County's preferred option is the extension of Mast Boulevard to improve regional network options and balance transportation choices for regional travel by businesses and residents.

VECTOR CONTROL

1. The County's Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV). The VCP respectfully requests that when implementing transportation improvements or environmental mitigation, impacts from possible mosquito breeding sources are considered. Any area that is capable of accumulating and holding at least% inch of water for more than 96 hours can support mosquito breeding and development.

2. For your information, the County of San Diego Guidelines for Determining Significance for Vectors can be accessed at:
   http://www.sandieqocounty.gov/contenUdam/sdc/pds/docs/vector_guidelines.pdf

   The California Department of Public Health Best Management Practices for Mosquito Control in California is available at:
   http://www.cdph.ca.gov/Healthlnfo/discond/Documents/BMPforMosquitoContro l07-12.pdf

3. The VCP appreciates the opportunity to participate in the environmental review process for this Project. If you have any questions regarding these comments, please contact Daniel Valdez at 858-688-3722 or by e-mail at Daniel.Valdez@sdcounty.ca.gov

The County looks forward to receiving future documents and/or notices related to this Project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Timothy Vertino at 858-495-5468 or by e-mail at timothy.vertino@sdcounty.ca.gov

Sincerely,

MARY KOPASKIE BROWN, AICP, MCIP
Chief, Advance Planning Division
Planning & Development Services

E-mail cc: Adam Wilson, Policy Advisor, Board of Supervisors,
District 2 Vincent Kattoula, CAO Staff Officer, LUEG
Nick Ortiz, Project Manager, PDS
Everett Hauser, Transportation Specialist,
PDS Erin Jensen, Administrative Analyst,
DEH

RESPONSE TO COMMENT LETTER D –
04/29/19 COUNTY OF SAN DIEGO

Response to Comment D-1
While the City will work cooperatively within the regional framework for reducing GHG emissions, the Mast Boulevard extension is an area outside the scope of the Sustainable Santee Plan.

Response to Comment D-2
The third action under Measure 7.4 has been reorganized as a Supporting Measure and reads:

> "Work with community groups, other public agencies and businesses to identify priority areas and install EV-charging stations."

The addition of the public agency to groups that the City would work with and a change of term from "e-chargers" to "EV charging stations" would have no effect on conclusions of the PEIR.

Response to Comment D-3
SolSmart is a national designation system recognizing cities, counties, and regional organizations that foster the development of mature local solar markets. The City would utilize the tools of this program to make its solar permitting process more efficient in coordination with the City's adoption of an online permitting system.
.

Response to Comment D-4
The City will coordinate with the County on efforts to achieve the solid waste diversion goals after the CAP is adopted.

Response to Comment D-5
The City will collaborate with the County on promoting rainwater harvesting rebates after the SSP is adopted.

Response to Comment D-6
The last action under Measure 6.1 on Page 42 of the SSP is has been reorganized as a Supporting Measure and revised to read:

> "Develop a City tree-planting program consistent with the urban forestry management plan and partner with other agencies and groups to plant additional trees."

Response to Comment D-7
Measure 6.1 , Page 41 of the SSP, includes active transportation routes (sidewalks and pedestrian paths) from Santee Light Rail Transit station to surrounding residential areas designed to encourage walkability.

Response to Comment D-8
The Sustainable Santee Plan is the City's plan to reduce GHG emissions and does not include specific projects. The plan does not create "on-the ground" projects that will impact MSCP or conservation areas in or adjacent to the City. Implementation of the SSP requires development of new ordinances and policies. The environmental impact of these ordinances and policies will be evaluated at the time they are brought forward for decision.

Response to Comment D-9
Future specific projects located in close proximity to the District trunk sewer line will be forwarded to the County of San Diego for review and comment.

Letter E

John O'Donnell

From: michele perchez <mperchez5@gmail.com>
Sent: Monday, April 29, 2019 4:02 PM
To: John O'Donnell
Subject: RE: draft proposal for Sustainable Santee Climate Action Plan and Environmental Impact Report

Dear Mr. O'Donnell,

E-1

The City's documents do not strongly address the concern of GHG emissions from transportation. In the document, there are no concrete steps to achieve GHG reductions spelled out in a manner that would allow their enforcement. Especially, considering the proposal of sprawl projects like Fanita Ranch that will add 1500-3000 units will make meeting state goals an even more daunting task. Even without this project, it will already be a challenge to reduce GHG to state goals. We know there will be more housing built in Santee--how about concentrating those units within the city core to allow use of the Trolley? A recent council meeting saw a REDUCTION in zoning density for a proposed project in the city core. The decision does not demonstrate to the public that the city leadership has a firm commitment to follow through on their own climate action plans. I also have my doubts about the plan having a real action component, since the city's climate action plan is not part of the city's General Plan--will many of the items listed not be implemented in a timely manner? Additionally, the Biological Resources aspect of the EIR is completely lacking in detail. No specific threatened or sensitive species are even named as concerns for your sustainability plan.

I propose you take more time to develop a more meaningful plan that can be robustly implemented, and hold more workshops to gather public input.

Thank you for your consideration of the concerns I (and I am sure others) have in regard to your draft proposals.

Sincerely,

Michele Perchez
10149 Carreta Drive
Santee, CA 92071

RESPONSE TO COMMENT LETTER E –

04/29/19 MICHELE PERCHEZ

Response to Comment E-1

The Sustainable Santee Plan is designed to reduce GHG emission in accordance with State targets. By definition, reducing GHG would be beneficial to threatened or endangered species. Impact significance discussion was included in the Draft PEIR and all potential impacts were evaluated as less than significant. SSP

Letter F

Janet Garvin
10338 Settle Rd
Santee, CA 92071
Jgarvinl950@gmail.com

RECEIVED
APR 29 2019
CITY OF SANTEE

April 29, 2019

John O'Donnell, Principal Planner
Mayor Minto and Santee City Council
City of Santee
10601 Magnolia Ave.
Santee, CA 92071

RE: Comments on Draft PEIR and Draft Sustainable Santee Plan

Dear Mr. O'Donnell, Mayor Minto and City Council Members:

I am very concerned with the Draft PEIR and Draft Sustainable Santee Plan. There does not appear to be much effort to reduce emissions from on-road transportation, which is our largest source of GHG emissions. Most of the GHG reduction measures in Chapter 3 of the plan lack specificity and enforceability. Specific examples of concern are as follows:

F-1

- "Within each measure, one or more actions are presented that indicate the steps the City **may** take in achieving the measure."
- "Actions **may be** added or **removed** over time, depending on their relevancy, funding availability, and whether the actions are successful in supporting measures as they are monitored over time, but are considered essential to guiding staff in implementation."

Using the word "may" leaves room for the City to do nothing. Actions should only be removed if they are found to not reduce GHG emissions.

I would also like to request the Sustainable Santee Plan include the following:

F-2

- efforts stop large urban spraw1 developments and have more infill development near public transit
- emission reduction goals to align with the state to be carbon neutral by 2045
- consistency checklists, similar to other cities in the region, for developers to demonstrate a consistency with the Sustainable Santee Plan
- enforceable strategies with a clear focus on emissions reductions through land use and transportation measures
- efforts for preserve of undeveloped land, specifically Fanita Ranch
- adding composting to our trash services and a plan to educate the community as an action to reduce waste to landfills
- a plan to join the San Diego regional JPA Community Choice program, presenting it to the council is simply not enough

F-3

In addition, why "the forecast for households in 2035 includes a 2,000-household buffer above the build out accommodated by the City's currently adopted General Plan"? Is this buffer for Fanita Ranch? If so, does the plan include how this would affect Vehicle Miles Traveled?

We are facing a climate crisis that must be addressed with immediate action. According to the landmark report by the UN Intergovernmental Panel on Climate Change (IPCC), we have 12 years to limit the climate change catastrophe. We must act now to aggressively fight this crisis. The climate crisis is the biggest threat facing our nation and our world. Our time is running out and we need our public servants to

be leaders in this movement. I urge you to create a stronger enforceable Sustainable Santee Plan that gets us to carbon neutral by 2045.

Thank you for the opportunity to respond.

Sincerely, yours,

Janet Garvin

Received unsigned on 4-29-2019

RESPONSE TO COMMENT LETTER F –

04/29/19 JANET GARVIN

Response to Comment F-1

See response to comment I-14. The SSP, like other climate action plans, will require continual refinement as measures are enacted and subsequent analysis reveals the effectiveness of each measure to achieve the stated GHG reductions.

Response to Comment F-2

Language regarding optimizing land use planning has been included in the plan. (Page 1)
Language on EO B-55-18 has been added to the plan. (Page 7)
Language on a "consistency checklist" has been added to the plan. (Page 79)
State guidance provides broad latitude on determining which areas of GHG emissions may reduced. The City determined GHG reductions based upon the City's ability to reduce emissions through building permit requirements, CEQA review of discretionary projects, changes in infrastructure and City operations. .
Preserving undeveloped land does not result in a reduction of GHG emissions. The SSP does not inhibit growth within the City. The SSP provides requirements that reduce GHG emissions as the population and the economy grows in the future.
See response to comment I-27. Composting is but one of several methods for reducing solid waste in as listed under Measure 8.1.
Work on a CCA is already in progress.

Response to Comment F-3

See Response to Comment B-24.

SAN DIEGO 350
CLIMATE CHANGE ACTION

Letter G

4/29/2019

John O'Donnell, Principal Planner
Santee City Council
10601 Magnolia Avenue
Santee, CA 92071
jodonnell@cityofsanteeca.gov

RECEIVED
APR 2 9 2019
CITY OF SANTEE

Re: Santee Climate Action Plan - "Sustainable Santee Plan" {SSP) & Draft PEIR

Dear Mr. O'Donnell,

SanDiego350 is an inclusive volunteer organization devoted to inspiring a movement to prevent the worst impacts of climate change and climate injustice. We strive to create a future that supports a livable planet and just society through education and outreach, public policy advocacy, and mobilizing people to take action. We represent approximately 10,000 local volunteers and supporters in the San Diego area.

Reducing local greenhouse gas emissions is vital to achieving statewide and global greenhouse emission reduction goals that are necessary to avoid the most catastrophic impacts of climate change. Numerous scientific studies, including the most recent report from the UN Intergovernmental Panel on Climate Change conclude that to avoid the worst impacts of climate change we most limit global warming to no more than 1.5 degrees Celsius above pre-industrial levels.

The IPCC and other experts in the field of climate science have concluded that to limit global warming below this 1.5 degrees Celsius threshold, global greenhouse gas emissions must be cut by at least 45% by 2030 and reach net-zero emissions by 2050.

San Diego is a region that is particularly vulnerable to the impacts of a changing climate that include sea level rise, increased frequency and intensity of fires, extreme heat waves and drought. The pathway to preventing the worst impacts of climate change is clear and we encourage the City of Santee to align its Climate Action Plan outcomes with these goals.

For the City of Santee to ensure they are playing an active role in reducing greenhouse gas emissions and promoting a just and sustainable future for all, we recommend that the Climate Action Plan and Draft PEIR consider the following recommendations:

G-1

- Ensure that all thresholds for significance for GHGs meet California's emissions targets including those outlined in SB 32, which mandates statewide GHG emissions reductions of 40 percent below 1990 levels by 2030 and Executive Order B-55-18, which mandates statewide carbon neutrality by 2045.

G-2

- All CEQA requirements should be enforceable with specific and measurable deadlines. For a CAP to be meaningful and enforceable CEQA requirements most be laid out clearly with no room for ambiguity or uncertainty.

G-3

- The CAP must be included in the City of Santee's General Plan, to ensure that the CAP is adequately funded, enforceable and that measurable goals are reported and monitored.

G-4

- A 100% renewable energy by 2035 goal must be included as part of a CAP that is seriously committed to achieving impactful GHG emission reductions. A 100% renewable energy goal places Santee in alignment with other regional CAP's and is a powerful tool for encouraging local economic development through local renewable energy development.

G-5

- Community Choice Energy has proven to be the best method for local governments to achieve 100% renewable energy goals and clearly outlined timelines for creating a Community Choice program should be included in the CAP. Community Choice provides the additional benefits of creating local control of power procurement, stimulating local economic development through local renewable energy development and maintaining competitive rates for residents.

G-6

- Outlining specific plans to develop alternative modes of transportation and zero emission vehicles need to be included in the CAP. As a single category, transportation accounts for 60% of the GHGs generated in the City and needs to be addressed through detailed and actionable plans. Specifically, the CAP needs to include mode share targets that define the percent of commuters who will walk, bike, and take transit to work. We also encourage Santee to partner with MTS and SANDAG to maximize ways in which the City can increase trolley ridership levels and encourage active transportation methods.

G-7

- Align CAP goals with SANDAG SB 375 targets with reductions of 15% by 2020 and 19% by 2035, not the outdated targets of 7% by 2020 and 13% by 2035.

G-8

- Develop land use and density strategies to create more transportation opportunities and reduce transportation GHG emissions through the creation of transportation priority areas and the development of affordable housing near job centers and public transit.

G-9

- Social equity and environmental justice must be prioritized. Climate change most significantly impacts disadvantaged communities that are disproportionately impacted by environmental pollution and socioeconomic challenges. We encourage Santee to utilize CalEnviroScreen 3.0 to identify the communities that will be most impacted by climate change and to create environmental and economic programs to specifically benefit those communities.

Thank you for the opportunity to comment on Santee's Climate Action Plan and draft PEIR. The actions taken by Santee through their CAP are vital to achieving essential greenhouse gas emission reduction goals and ensuring a sustainable future for all. We stand ready to partner with Santee to develop a Climate Action Plan that achieves these goals.

Sincerely,

Ryan O'Connor, Policy Organizer
SanDiego350

RESPONSE TO COMMENT LETTER G – 04/29/19 SANDIEGO350

Response to Comment G-1
The Sustainable Santee Plan is consistent with all codified State emissions targets. EO B-55-18 is an aspirational goal for which the California Air Resources Board has been tasked with developing a methodology and quantification scheme. See Response to Comment B-4.

Response to Comment G-2
This is a general comment regarding CEQA requirements. The SSP is designed to meet the requirement of Section 15183.5 of the CEQA Guidelines.

Response to Comment G-3
There is no requirement for a CAP to be included in a City's General Plan. Section 15183.5 of the CEQA Guidelines states that Lead agencies may analyze and mitigate the significant effects of GHG emissions at a programmatic level such as in a general plan, a long range development plan, or a separate plan to reduce GHG emissions.

Response to Comment G-4
The 100% renewable energy by 2035 has been included in the CAP under Measure 9.2 with the CCA program.

Response to Comment G-5
On October 8, 2019, City Council voted unanimously to move forward with a CCA Program. The City is actively evaluating opportunities for local jurisdiction partners within SDG&E's territory to develop and implement a CCA that would product mutually beneficial results. To estimate the associated emissions reductions, the SSP assumed that City Council would approve a CCA and launch the program sometime in 2022 with the goal of achieving 100 percent renewable energy by 2035.

Response to Comment G-6
The City regularly partners with SANDAG, and in some cases MTS to provide active transportation opportunities. In addition, Measure 6.1 and 6.2 are designed to achieve an increase in the mode share of active transportation.

Response to Comment G-7
SB 375 has been discussed in the Introduction Chapter of the Sustainable Santee Plan and the Sustainable Santee Plan reduction targets are consistent with SB 375. Additionally, the PEIR Section 4.4 Greenhouse Gas also discusses CAP consistency with SB 375.

Response to Comment G-8
The Sustainable Santee Plan is designed to meet State targets for GHG emission reductions. How the GHG reductions are achieved are up to individual jurisdictions.

Response to Comment G-9
CalEnviroScreen 3.0 was used to identify communities in the City that are potentially subject to environmental justice. However, it was determined that none of the communities are subject to the environmental justice issue. The SSP includes a social equity section in Chapter 4, which discusses potential problems that may happen to the disadvantaged populations and the strategies to mitigate the impacts to them.

Letter H

Evlyn Andrade-Heymsfield
10272 Easthaven Dr.
Santee, CA 92071
andrade.evlyn@gmail.com

April 29, 2019

John O'Donnell, Principal Planner
Mayor Minto and Santee City Council
City of Santee
10601 Magnolia Ave.
Santee, CA 92071

RE: Comments on Draft PEIR and Draft Sustainable Santee Plan

Dear Mr. O'Donnell, Mayor Minto and City Council Members:

I am very concerned with the Draft PEIR and Draft Sustainable Santee Plan. I did not see a strong effort to reduce emissions from on-road transportation, which is by far our largest source of GHG emissions. Additionally, most of the GHG reduction measures in Chapter 3 of the plan are not specific and do not seem enforceable which is concerning. I'd like to point out two examples of concerning language:

H-1

- "Within each measure, one or more actions are presented that indicate the steps the City **may** take in achieving the measure."
- "Actions **may be** added or **removed** over time, depending on their relevancy, funding availability, and whether the actions are successful in supporting measures as they are monitored over time, but are considered essential to guiding staff in implementation."

We are facing a climate crisis and our city must act appropriately. Using the word "may" leaves room for the City to do nothing. Additionally, actions should only be removed if they are found to not reduce GHG emissions. I would also like to request the Sustainable Santee Plan include the following:

H-2

- efforts stop large urban sprawl developments and have more infill development near public transit
- emission reduction goals to align with the state to be carbon neutral by 2045
- enforceable measures for developers to be consistent with the Sustainable Santee Plan
- enforceable measures with a clear plan on reducing emissions through land use and transportation
- efforts to preserve undeveloped land, specifically Fanita Ranch
- adding composting to our trash services and a plan to educate the community as an action to reduce waste to landfills
- a plan to join the San Diego regional JPA Community Choice program, presenting it to the council is simply not enough

H-3

Additionally, could you tell me why "the forecast for households in 2035 includes a 2,000-household buffer above the build out accommodated by the City's currently adopted General Plan"? Is this buffer for Fanita Ranch? If so, does the plan include how this would affect Vehicle Miles Traveled?

We are facing a climate crisis that must be addressed with immediate action. According to the landmark report by the UN Intergovernmental Panel on Climate Change (IPCC), we have 12 years to limit the climate change catastrophe. We must act now to aggressively fight this crisis. The climate crisis is the biggest threat facing our nation and our world. Our time is running out and we need our public servants to be leaders in this movement. I urge you to create a stronger enforceable Sustainable Santee Plan that gets us to carbon neutral by 2045.

Sincerely,

Evlyn Andrade-Heymsfield

RESPONSE TO COMMENT LETTER H – 04/29/19 EVLYN ANDRADE-HEYMSFIELD

Response to Comment H-1
This comment is the same as Comment F-1. Refer to Response to Comment F-1.

Response to Comment H-2
This comment is the same as Comment F-2. Refer to Response to Comment F-2.

Response to Comment H-3
See Response to Comment B-24.

Letter I

CLIMATE ACTION CAMPAIGN

April 29, 2019

Mayor Minto and Council
City of Santee
10601 Magnolia Ave.
Santee, CA 92071

RE: Comments on the Sustainable Santee Plan and Draft PEIR

Dear Mayor Minto and Council:

Climate Action Campaign is a nonprofit organization with a mission to stop climate change. We have played an active role in the development of every Climate Action Plan (CAP) in the region since 2015, and we release an annual Report Card evaluating the strength of cities' CAPs and how effective their implementation has been.

I-1 Thank you for the opportunity to provide input on the Sustainable Santee Plan. While we support the inclusion of a 100% clean energy target with Community Choice as the key strategy to reach that target, there are numerous and significant gaps between what the law and the best available climate science demands and what the Draft CAP presents.

I-2 As a Qualified GHG Reduction Plan under CEQA, the CAP is a legally binding document and must include enforceable measures that are specific, unambiguous, and contain clear requirements. Unfortunately, many of the measures in this Draft CAP do not pass legal muster and must be revised to be sufficiently enforceable. Further, the Screening Tables used to evaluate whether proposed projects are consistent with the CAP fail to define a clear relationship between the criteria and point values assigned in the Tables, and the requirements of the CAP. Finally, the CAP fails to commit to actionable strategies to pursue smart growth and avoid the GHG emissions and air quality impacts associated with urban sprawl.

I-3 We recommend that Santee re-establish the city's targets to align with the carbon neutrality goal in Executive Order B-55-18, with a horizon year of 2045, and develop a new set of enforceable strategies with a clear focus on emissions reductions through land use and transportation measures, 100% clean energy, building electrification to phase out consumption of natural gas, zero waste, conservation of open space to sequester carbon, urban forestry, and social equity.

Please find our specific comments on measures in the CAP and on the Screening Tables below.

Chapter 1

Introduction

I-4 p. 1: The introduction must acknowledge the role of land use in reducing GHG emissions, along with energy efficiency, renewable energy, increasing waste diversion from landfills, and enhancing access to biking, walking, and transit.

Regulat01y Setting

I-5 p. 4: The CAP must include Executive Order B-55-18 calling for Carbon Neutrality by 2045. Recent climate science such as the UN IPCC Special Report on Global Warming l.5°C, and the 2018 Executive Order setting a statewide carbon neutrality goal, make it clear that at the local level we must plan for deep decarbonization.

I-6 p. 7: In the section "California Code of Regulations Title 24, Part 6," the CAP should describe the changes made in the 2019 update, which will go into effect on January 1, 2020.

City Setting

I-7 p. 8: The CAP states, "Approximately half of the City's land is undeveloped, with opportunity for growth." It would be equally accurate, and in line with state climate goals, to note the opportunity for carbon sequestration through preservation of undeveloped land in Santee.

Chapter 2

GHG Emissions Inventory

I-8 p. 9: The baseline against which emissions reductions are measured should be a reflection of the best available data on current existing conditions. Other cities in the region are using baseline years much closer to the current year, which are a more accurate reflection of current conditions. Further, methodologies for inventorying GHG emissions have changed since 2005. Was the 2005 inventory done with a methodology consistent with the methodology used currently for inventories, in particular for VMT?

I-9 p. 12: The CAP states that emissions from energy use accounted for 54 percent of total community emissions in 2013. This should be corrected; the actual amount is 32%.

I-10 p. 14: Please explain further why it is appropriate to include a 2,000 household buffer above the build out accommodated by the City's currently adopted General Plan and explain how adding that buffer affected projections of emissions, especially from VMT. What assumptions were used about where those households would be located and how they would travel, and why were those assumptions used?

Community Targets

I-11 p. 19: The CAP horizon of2035 falls ten years short of Executive Order B-55-18, which sets a statewide goal of carbon neutrality by 2045. In light of the unfolding planetary emergency we are facing as the climate crisis intensifies, Santee should extend its CAP horizon to at least 2045 and align with the state carbon neutrality target. In addition, the CAP is unclear as to whether the city's targets are calculated on a mass emissions basis or a per capita basis. This, too, should be clarified.

Chapter 3: GHG Reduction Measures

Technical Appendix

I-12 The CAP must provide substantial evidence for each strategy that its implementation will lead to the GHG reductions identified for that strategy, and that cumulatively the strategies will achieve the target

I-12 Continued

GHG reductions. The final CAP must include a technical appendix that shows the assumptions and calculations used to calculate the reduction potential of each measure.

I-13

The footnotes below each measure stating the assumptions used do not draw a clear line from action to emissions reduction. In other words, they are not sufficient to demonstrate that the actions, if implemented, would result in the projected reductions. Further, the footnotes often express the GHG reduction potential from a measure that includes numerous actions, some of which are voluntary, some mandatory. It is not possible to discern from these footnotes which actions lead to which amount of GHG reduction potential. The technical appendix must specify the GHG reduction potential for each action.

Enforceability

I-14

The measures in CEQA-Qualified GHG Reduction Plans (CAPs) must be enforceable; the language on page 23 saying, "Within each measure, one or more actions are presented that indicate the City *may* take in achieving the measure" should be revised to state clearly that the City *will* take the actions listed. Similarly, the statement that actions may be added or removed over time needs to be clarified. Actions may not be added or removed without demonstrating, with substantial evidence, that the remaining measures will still meet the CAP reduction targets. It would be appropriate to state, "Measures may be added or removed over time during regularly scheduled CAP updates and with substantial evidence to demonstrate that the revisions allow the city to meet its legally binding targets."

GHG Reduction Measures

I-15

Measure 1.2: Education and outreach measures that express good intentions but lack meaningful enforceability violate CEQA. They may serve as supporting measures, but the city may not count on GHG reductions from voluntary measures such as this one, which depends on voluntary action undertaken based on outreach and education.

I-16

Measure 1.3: This measure includes two ordinances whose GHG reduction impacts should be quantified.

I-17

Measure 1.4: The CAP needs to clarify which of the four actions in this measure are being used to quantify potential GHG reductions. Two of the four are purely voluntary (promote existing incentivized programs and promote participation in Green Building Program), and no reductions should be assumed. The action, "Establish or promote financing programs for home upgrades such as HERO" must be clarified: will the city establish a financing program or promote it? Depending on the action, presumably the GHG reduction potential will vary. If the action is simply to "promote" a financing program, no reductions should be assumed.

I-18

Measures 2.1. 3.2, 3.4, 4.1, 5.1, 5.2: These should be supporting measures, as none of the actions listed are meaningfully enforceable.

I-19

Measure 6.1: The action, "Propose a change to landscaping ordinance to require more trees on site during project review and plan check" needs more specificity in order to quantify GHG reduction potential.

I-19 Continued

Measure 7.2: As with all measures, detailed information about the assumptions and calculations used to arrive at GHG reduction potential is needed. This measure in particular projects huge reductions from the development of bike infrastructure compared with other plans in the region. For example, the City of San Diego's CAP sets a target of 18% of commutes made by bike by 2035, which would make San Diego arguably the most bike-friendly city in the country, and the GHG reduction potential for that measure is 50,574 MT C02e. San Diego's population is approximately 1.4 million. Meanwhile, Santee projects 12,600 MT C02e reduced, with a population of just 65,000. On a per capita basis, San Diego expects to reduce emissions .036 MT per person, whereas Santee expects to reduce by .19 MT per person. That means Santee is expecting to achieve emissions reductions at 5.4 times the rate, per capita, of San Diego. That is a significant claim and needs to be backed up with substantial evidence that implementation of the Bike Master Plan can actually be expected to achieve the ridership necessary to avoid those emissions.

I-20

Measure 7.3: More detailed information is needed about assumptions and calculations used to arrive atthe GHG reduction projections for this measure. Further, the measure lacks the specificity required of measures in plans used for streamlining under CEQA. The only requirement in the measure is for businesses 'of a certain size' to provide 'facilities.' Neither the size of the businesses that would be subject to the requirement, nor the specific facilities required, are defined. This lack of detail makes the measure unenforceable, which violates CEQA. It is not possible to discern whether the GHG reduction potential assumes reductions just from the transportation demand management policy sketched out in this measure, or whether the CAP also assumes that reductions will be achieved through the action that reads, "Promote ridesharing and facilitate air district incentives for ridesharing through Mobility Element Objective 9.0." Because this action depends on voluntary action alone, it is not enforceable and no reductions should be assumed.

I-21

Measure 7.4: This measure appears to count EV ownership, based on state policies and programs, as a local action. If the city is depending on state policies and programs for these reductions, then they should not be counted as part of this measure.

I-22

The only action in this measure that approaches enforceability is "Require or incentivize new residential and commercial developers to install e-chargers"; however, the lack of specificity ("require *or* incentivize") makes the measure unenforceable. Because the action the city will take is unclear, it is unclear whether the GHG reduction potential assumes a requirement or an incentive. The measure needs to clarify exactly what actions are called for.

Measure 7.5: The actions in this measure are not sufficiently actionable, quantifiable, or enforceable to function as valid GHG reduction measures for streamlining under CEQA.

I-23

- The Complete Streets Program outlined in Objective 1.0 of the Mobility Element is a set of broad statements of good intention, not a series of specific actions the city will take. Implementation of this objective could result in a wide range of highly varied outcomes. Statements such as "design streets in a manner that is sensitive to local context," and "ensure the entire right-of-way is designed to accommodate appropriate modes of transportation," provide no assurance that implementation of these policies would result in more biking, walking, or transit in Santee.

I-24

- Establishing a safe routes to school program is a laudable goal, but the outcomes that such a program would deliver are uncertain and unspecified, so the reduction potential from this action is not quantifiable.

I-25

- Mobility element Policy 1.4 expresses a broad, general direction to develop multi-modal corridors to encourage walking, biking, and transit. The action does not refer to any specific plans to improve biking, walking, or transit. It is not sufficiently designed to be enforceable. Finally, what is the difference between the intention to create a connected system of multi-modal corridors and implementation of the Bicycle Master Plan? The CAP needs to demonstrate that the same emissions reductions are not being counted twice.

I-26

Measure 7.6: Please clarify whether the city has the authority to require that the school district expand the school bus program. If not, the city may not claim emissions reductions from this action, as the school bus program is outside its jurisdiction. If the city *does* have the authority to require an expansion of school bus service, the CAP must clarify by how much service would need to increase to achieve the emissions reductions projected in this measure.

I-27

Measure 8.1: While we commend Santee's setting a target of 90% waste diversion by 2035, it is not clear that the actions listed in this measure are sufficient to meet that target or achieve the GHG reduction potential projected. Two of the four actions are voluntary measures expressing an intent to educate the community and encourage partnerships, and the action, "Add additional recycling containers in public places" lacks specificity. How many recycling containers would be added, and where? How much will those additional containers increase the rate of diversion from the landfill? The city needs to articulate precisely how Santee will reach the 90% target identified in the CAP.

I-28

Measure 9.2: We support Santee's intent to join a regional Community Choice program and to reach 100% clean energy by 2035. This measure states that electricity accounts for 54% of the City's baseline emissions inventory, while the actual percent is 32%. Were the calculations estimating GHG reduction potential from Community Choice developed using the 54% or the 32% figure?

I-29

The CAP states that because developing and implementing a Community Choice program will take time, the program and its associated reductions are listed separately from the other measures in the plan. The CAP is by nature a long-term plan to reduce emissions, and most of the measures will take significant time to implement fully. For example, fully building out the projects in the Bicycle Master Plan will likely require at least several years, even on an aggressive schedule. Similarly, achieving a 90% waste diversion target will take years. Please clarify in what way the timeline for implementation of Community Choice is meaningfully different from all other local reduction measures.

CEQA Screening Tables

I-30

The CAP states that the screening tables will allow Santee to avoid 1,308 MT C02e from new development. Other cities in the region have developed CAP Consistency Checklists to ensure that projects that wish to tier from the CAP are in fact implementing measures consistent with what is required in the CAP. Santee, by contrast, uses Screening Tables, which are set apart from other CAP measures as a

separate measure with its own estimated reductions. There is no apparent relationship between points earned using the Screening Tables and consistency with the requirements of the CAP.

Projects relying on the CAP to streamline environmental review must demonstrate that they will be built in a way that is consistent with the requirements of the CAP. The CAP fails to demonstrate any clear connection between earning 100 points or more through the screening tables and demonstrating consistency with the requirements of the CAP.

Furthermore, the screening tables leave so much to the discretion of city staff as to be meaningless. For example, the point values associated actions to reduce VMT are "TBD" and would be determined on a case by case basis depending on traffic studies. No criteria are established that define the amount of VMT avoided that would be associated with a particular number of points. The effect of leaving multiple point categories "TBD" is that consistency with the CAP has no effect on whether projects earn 100 points; everything is left to the discretion of city staff.

I-30 Continued

Finally, the Screening Tables include "off-site renewable energy project" as an option for project applicants to earn an assigned point value "TBD." This could allow a project that meets none or very few of the requirements of the CAP to build renewable energy facilities or invest in energy retrofits off-site and still earn the 100 points required to be deemed consistent with the CAP. There are no geographical boundaries set limiting where the investment can be made, meaning there is no assurance that the benefits would be realized in Santee. Projects that cannot meet the requirements of the CAP through on-site actions, including smart land use, are not consistent with the CAP. The CEQA process, not a loophole in the consistency checklist or screening table, is the appropriate place to propose and discuss mitigation measures such as off-site renewable energy.

Conclusion and Summary of Recommendations

The CAP as written contains numerous unenforceable measures, violating the requirements of CEQA, includes calculations for emissions reductions from transportation that merit close examination and likely revision, and the Screening Tables presented as a way for projects to tier from the CAP raise serious questions about their value as a tool to evaluate CAP consistency.

In order to facilitate moving forward with a plan that satisfies the requirements of CEQA and fulfills the moral obligation to leave a planet that is habitable for kids growing up today, we recommend that the city go back to the drawing board to develop a CAP that relies solely on enforceable measures, includes a technical appendix that clearly defines the assumptions and calculations used to project GHG reduction potential, meaningfully addresses emissions from land use and transportation, and sets out clear requirements for projects seeking to establish consistency with the CAP.

In the interim, we encourage the city to continue pursuing development of a Community Choice program to achieve 100% clean energy, design and construction of the network envisioned in the Bicycle Master Plan, and implementation of other actions to reduce emissions and improve quality of life. Santee can and should work in the public interest toward clean air, safe streets, and a livable climate, while

simultaneously revamping the CAP to put forward a plan that would enable the city to do its fair share to combat the most dire threat facing humanity.

Sincerely,

Sophie Wolfram Director of Programs
Climate Action Campaign

RESPONSE TO COMMENT LETTER I –
04/29/19 CLIMATE ACTION CAMPAIGN

Response to Comment I-1
This comment is introductory in nature. No response is required.

Response to Comment I-2
In consultation with the Climate Action Campaign the language under several measures (1.1, 2.1, 3.1, 4.1, 5.1, 5.2, 6.1, 6.2, 7.1, 8.1, 10.1 and 10.2) has been expanded to describe the requirements of each reduction measure, the metrics for measuring success of each measure, and the GHG reduction potential for each action/measure. All non quantified actions were reorganized as Supporting Measures at the end of Chapter 3 of the SSP. all actions without an associated GHG reduction potential number are considered supporting measures. The many actions in the SSP each contain a specific action to be completed in a specific timeline.

Also in consultation with the Climate Action Campaign the Screening Table to the SSP have been replaced with a Consistency Checklist to ensure that all new development projects are implementing the reduction measures applicable to new development.

Response to Comment I-3
See Response to Comment B-4.

Response to Comment I-4
The first paragraph on Page 1 of the SSP is revised to:

> … By using energy more efficiently, harnessing renewable energy to power buildings, recycling waste, ~~and~~ enhancing access to sustainable transportation modes, and optimizing land use planning, the City can keep dollars in its local economy, create new green jobs, and improve the community's health, safety, and welfare in addition to addressing climate change…

Response to Comment I-5
See Response to Comment B-4.

Response to Comment I-6
The following has been added to the second paragraph on Page 7 of the CAP is revised to:

> The 2019 Title 24 standards, which will become effective on January 1, 2020, are estimated to result in new buildings that use 7 percent less energy for lighting, heating, cooling, ventilation, and water heating than the previous 2016 Standards. The 2019 updates to Title 24 are focused on moving closer to zero net energy (ZNE) homes by increasing energy efficiency and requiring solar photovoltaic (PV) systems for new homes. The 2019 Title 24 standards also encourage demand responsive technologies including battery storage and heat pump water heaters and improve the building's thermal envelope through high performance attics, walls and windows to improve comfort and energy savings.

Response to Comment I-7
Actions that promote carbon sequestration are Supporting Measures in the SSP. Carbon sequestration by itself does not reduce man-made GHG emissions and therefore cannot be counted in the SSP. See Response to Comment B-20.

Response to Comment I-8

The baseline year is used to set reduction targets. The AB 32 reduction target for 2020 is based on the 1990 emission level, however, it is difficult to collect data and calculate 1990 emission level. Therefore, the Scoping Plan recommends the reduction target of 15 percent below 2005 to 2008 emission levels by 2020, which is equivalent to the 1990 emission level. Consistent with the direction of the Scoping Plan, the City used 2005 as the baseline year, and set the

reduction target against it. Note that because the earliest the SSP will be adopted is January 2020, the SSP has focused the reduction measures on 2030 and 2035 reduction targets.
All of the four inventories (2005, 2008, 2012, and 2013) were developed in 2015, and used the methodologies in the U.S. Community Protocol for Accounting and Reporting Greenhouse Gas Emissions developed by ICLEI. This protocol is currently followed by jurisdictions to develop GHG emissions inventories. So the 2005 inventory was done with a methodology consistent with the methodology used currently for inventories.

Response to Comment I-9
The second sentence of Page 12 of the SSP is revised to read:
Emissions from energy use account for 31~~54~~ percent of total community emissions in 2013.

Response to Comment I-10
See Response to Comment B-24

Response to Comment I-11
See Response to Comment B-4

Response to Comment I-12
The quantification of GHG reductions from Measure 1.2 has been revised and shown as a City action under Measure 1.1 which now require all existing residential units that seek building permits for minor modifications, alterations, and additions (less than 30 percent of the home) to perform energy efficiency audits and include recommended energy efficiency retrofits resulting from the audits. This measure was designed to capture the reductions associated with participation in SDG&E energy efficiency programs. The associated GHG reduction value is based on participation rates in Santee between 2013 and 2017. This information has been added to Measure 1.1.

Response to Comment I-13
Measure 1.3, Promote Home Energy Evaluations, has been changed to a requirement to preform energy audits of existing residential units and provide recommended energy efficiency improvements in Measure 1.1 as described in Response to I-12. Note that because of this reorganization of the measures, the measure number (Measure 1.3) is no longer within the SSP.

Response to Comment I-14
The word “may” was used in the introductory paragraph on Page 23 and not any specific measure or action. The word “will” has replaced this term.

The sentence on removing or adding action items has been modified to read:
“Actions may be added, removed, or modified during a Sustainable Santee Plan Update that is approved with a public hearing and by presenting substantial evidence that the measures and actions are consistent with the State’s GHG reduction targets.”

More generally on enforceability, all of the reduction measures have been reorganized to include enforceable requirements, with defined Performance metrics and dates to meet the performance metrics. These changes to the SSP are meant to address the CAC’s concern on enforceability.

Response to Comment I-15
Measure 1.2 Education and outreach described in the comment have been reorganized as a “Supporting Measure at the end of Chapter 3. All of the reduction measures have been revised to include distinct requirements and enforceable actions. See Response to Comment I-12.

Response to Comment I-16
Measure 1.3 is now part of Measure 1.1 and includes quantified GHG reductions. See Response to Comment I-13

Response to Comment I-17
The actions under Measure 1.4 of the SSP has been revised to as a City action under Measure 1.1 requiring all existing residential units that seek building permits for major modifications, alterations, and additions (over 30 percent of the home) to perform energy efficiency audits and include recommended energy efficiency retrofits resulting from the audits that could include replacing the HVAC system or other major energy efficiency retrofits.

Response to Comment I-18
Actions under Measures 2.1, 3.1, 4.1, 5.1, and 5.2 have been expanded to provide requirements, metrics to measure success and explain the GHG reduction methodology and calculation. In addition, Appendix C of the SSP includes details on how the GHG reductions for each measure was quantified.
.

Response to Comment I-19
The first action to adopt a Landscape Ordinance under Measure 6.1 was moved to the end of Chapter 3 as a Supporting Measure and is not quantified. The remaining actions under this measure have been reorganized into Measure 5.1 and provides performance metrics and the quantify the GHG reduction potential.

The second part of the comment relates to Measure 7.2. The GHG reduction potential for this Measure has been scaled downward to show a reduction of 311 $MTCO_2e$ by 2030 and 259 $MTCO_2e$ by 2035. This is consistent with other CAPs in the San Diego region. The measure has also been reorganized as Measure 6.2 and reads as follows:

"Starting in 2020 with completion by 2030 the City will expand bike routes to improve bike transit by increasing Class 1 Bike Path from 2.0 miles to 15.5 miles, Class 2 Bike Lane from 14.5 miles to 34.3 miles, and Class 3 Bike Route from 9.3 miles to 21.7 miles, which would implement City of Santee Bicycle Master Plan."

Response to Comment I-20
In consultation with the Climate Action Campaign, Measure 7.3 has been eliminated from the SSP.

Response to Comment I-21
GHG reductions resulting from State actions are shown in the "Adjusted Business as Usual (ABAU) forecasts, and aree not counted as part of the Reduction Measures.

Response to Comment I-22
Measure 7.4 is now listed as Measure 7.1 and has been revised to read:

"On or before December 2020 require all new residential and commercial development to install e-chargers. For new Single Family Residential Install complete 40 Amp electrical service and one e-charger, for new Multi-family Residential install e-chargers for 13 percent of total parking, for new Office Space, Regional Shopping Centers, and Movie Theaters, install e-chargers for 5 percent of total parking spaces, and for new Industrial and other Land Uses employing 200 or more employees install e-charges for 5 percent of total parking spaces."

Response to Comment I-23
In consultation with the Climate Action Campaign, Measure 7.5 has been has been eliminated from the SSP.

Response to Comment I-24
See response to Comment I-23.

Response to Comment I-25
See Response to Comment Number I-23.

Response to Comment I-26
See Response to Comment Number I-23.

Response to Comment I-27
In consultation with the Climate Action Campaign, Measure 8.1, has been renumbered as Measure 9.1 and the wording replaced with the following:

"Require solid waste collector to provide recycling containers for all customers in compliance with State law and facilitate waste diversion requirements mandated on all solid waste facilities."

Response to Comment I-28
A detailed description of how the GHG reductions associated with the CCA is provided in Appendix C of the SSP.

Response to Comment I-29
On October 8, 2019, City Council voted unanimously to move forward with a CCA Program. The City is actively evaluating opportunities for local jurisdiction partners within SDG&E's territory to develop and implement a CCA that would product mutually beneficial results. To estimate the associated emissions reductions, the analysis of the CCA assumed that City Council would approve a CCA and launch the program sometime in 2022 with the goal of achieving 100 percent renewable energy by 2035.

Response to Comment I-30
In consultation with the Climate Action Campaign, the Screening Tables have been replaced with a CAP Consistency Checklist.

Letter J - Received after the close of review period

John O'Donnell

From: Sophie Wolfram <sophie@climateactioncampaign.org>
Sent: Monday, April 29, 2019 5:10 PM
To: John O'Donnell
Subject: Re: Santee CAP Comments

Thanks, John. Please note that these comments are supplemental to the comments submitted in coordination with several other organizations.

J-1

Best,

Sophie Wolfram

Director of Programs
Climate Action Campaign (914) 715-2451

Follow us on Twitter: @sdclimateaction
Our Mission is Simple: Stop Climate Change

On Mon, Apr 29, 2019 at 5:08 PM John O'Donnell < jodonnell@cityofsanteeca.gov> wrote:

Sophie,

We did receive your comments. Thank you for your time and effort.

John O'Donnell | AICP | Principal Planner
(619) 258-4100, Extension 182
City of Santee
10601 Magnolia Avenue Santee, CA 92071

From: Sophie Wolfram [mailto: sophie@climateactioncampaign.org]
Sent: Monday, April 29, 2019 4:52 PM
To: John O'Donnell
Subject: Santee CAP Comments

RECEIVED
APR 29 2019
CITY OF SANTEE

Hi John,

Please find attached CAC's comments on Santee's CAP.
Thank you,

Sophie Wolfram

Director of Programs Climate Action Campaign (914) 715-2451

Follow us on Twitter: @sdclimateaction

Our Mission is Simple: Stop Climate Change

RESPONSE TO COMMENT LETTER J –
04/29/19 CLIMATE ACTION CAMPAIGN

Response to Comment J-1
Comment relates to its own comments and a joint comment letter. No response is required.

John O'Donnell

Letter K - Received after the close of review period

From: dennis@climateleaderstoolkit.com
Sent: Monday, July 22, 2019 10:36 AM
To: John O'Donnell
Subject: FW: Query about energy related to moving water

Hi John,

I wrote to the Department of Water Resources to get clarification on the energy budget related to water. I included the relevant part of Lauren Bisnett's reply below. The conclusion I reach is that Santee's CAP as it is currently written under-represents the slice of the energy pie related to water. (This is also true of every CAP I have read.)

K-1

While it is true that the city itself is only responsible for the energy related to its own pumping stations, the pie chart is disempowering for residents because it cloaks the actual energy savings residents provide when they conserve water. And conserving water is easy to do. If this were only a few percentage points it wouldn't matter, but from my calculations, it looks like a difference of ten percent.

All the best,

--Dennis

Dennis Selder
Climate Leaders Toolkit
(619)750-4923
dennis@climateleaderstoolkit.com

From: Bisnett, Lauren@DWR <Lauren.Bisnett@water.ca.gov>
Sent: Friday, July 19, 2019 3:13 PM
To: dennis@climateleaderstoolkit.com
Subject: RE: Query about energy related to moving water

Good afternoon Dennis,

Thanks for your patience while I looked into this information for you. Please see below.

1. **How much energy is required to move an acre-foot of water or similar unit of measurement from the Delta to San Diego at the point where district utilities receive it?**
   The State Water Project (SWP) uses around 8,000 gigawatt hours per year and the SWP generates about half of all the energy it uses each year. This accounts for about 3 percent of statewide electricity use.
   The California Department of Water Resources (DWR) delivers water to 29 state water contractors. The southern-most contractor is the Metropolitan Water District of Southern California (MWD). The San Diego County Water Authority is not contracted with DWR for SWP water supplies, however they are a member water agency of MWD. For SWP water delivered to MWD, the energy intensity is 3,254 kWh/acre-foot (energy intensity reflects a net five year average).
   You can find information on various locations and energy intensity of water supplies on our interactive map here: https://dwr.maps.arcgis.com/apps/Styler/index.html?appid=c112a21431884158b58fc5564e66c439

2. **In terms of energy expenditures, are DWR costs substantially lower to the taxpayer because it is also a generator of power? If so, by what percentage? Also, what are the data sources for that calculation?**

The SWP is not funded by tax dollars or the General Fund. The SWP delivers water to 29 agencies that have contracts for annual deliveries of water. Through those contracts, the public agencies are repaying the cost of general obligation bonds, plus interest, required for construction of the system, equipment, environmental projects, and operations and maintenance of the SWP. SWP hydroelectric plants help keep water delivery rates to SWP contractors affordable by producing much of the electricity needed to pump water. Costs are also defrayed by pumping during off-peak hours when electricity is less expensive and generating power for sale during periods of high demand when power is more expensive. For a detailed discussion of DWR energy costs and revenue data, please see DWR Bulletin 132-17, Chapter 10, p. 216-218.

Kind regards,
Lauren B.
Information Officer

RESPONSE TO COMMENT LETTER K – 07/22/19 CLIMATE ACTION CAMPAIGN

Response to Comment K-1

The commenter mention that the SSP under reflects the electrical cost of water much like “every other CAP” he has read. This demonstrates that the SSP’s methodology for calculating the energy use related is consistent with other climate action plans.

The commenter’s email included a section of an email from the California Department of Water Resources which stated that the San Diego County Water Authority (“SDCWA”) has not contracted for water from the State Water Project (“SWP”). The City’s water provider, Padre Dam Municipal Water District, is a member agency of the SDCWA and therefore does not use water from the SWP. The attached email focused on energy calculations from the SWP. Since, Padre Dam does not use any SWP water, the argument is irrelevant.

APPENDIX D-1

LETTERS TO AGENCIES

August 1, 2019

Mr. Seth Lichney
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

RE: Sustainable Santee Plan (SCH#2017081030)

Dear Mr. Lichney:

The City of Santee has prepared the Final Program Environmental Impact Report (PEIR) for the Sustainable Sate Plan (Project). You are receiving this letter because you provided comments on the Draft PEIR for the subject Project. In accordance with CEQA Guidelines Section 15088, the City has evaluated all comments on environmental issues received on the Draft PEIR and prepared a written response to each in a "Responses to Comments" document, printed and enclosed herewith. A copy of the Final PEIR on a DVD has also been enclosed. The Final PEIR consists of changes to the Draft PEIR presented in underline/strikethrough format and three new sections: a Preface that explains the composition and formatting of the Final PEIR, Appendix D, the Responses to Comments, and Appendix E, the Mitigation Monitoring and Reporting Program. Any new information provided in this Final PEIR merely clarifies, amplifies or makes insignificant modifications to the Draft PEIR.

The City Council of the City of Santee is scheduled to consider certification of the Final EIR and approval of the Sustainable Santee Plan at 7:00 pm on Wednesday, August 14, 2019 at Santee City Hall located at 10601 Magnolia Ave., Santee, CA 92071.

If you have any additional questions, please contact me at 619-258-4100, extension 182 or via email at jodonnell@cityofsanteeca.gov.

Sincerely,

John O'Donnell, AICP
Principal Planner

Enclosures: Responses to Comments
Final PEIR DVD

August 1, 2019

Mr Eric Lardy, AICP
Chief, Advance Planning Division
Planning & Development Services
County of San Diego
5510 Overland Ave., Suite 310,
San Diego, CA 92123

RE: Sustainable Santee Plan (SCH#2017081030)

Dear Mr. Lardy:

The City of Santee has prepared the Final Program Environmental Impact Report (PEIR) for the Sustainable Sate Plan (Project). You are receiving this letter because you provided comments on the Draft PEIR for the subject Project. In accordance with CEQA Guidelines Section 15088, the City has evaluated all comments on environmental issues received on the Draft PEIR and prepared a written response to each in a "Responses to Comments" document, printed and enclosed herewith. A copy of the Final PEIR on a DVD has also been enclosed. The Final PEIR consists of changes to the Draft PEIR presented in underline/strikethrough format and three new sections: a Preface that explains the composition and formatting of the Final PEIR, Appendix D, the Responses to Comments, and Appendix E, the Mitigation Monitoring and Reporting Program. Any new information provided in this Final PEIR merely clarifies, amplifies or makes insignificant modifications to the Draft PEIR.

The City Council of the City of Santee is scheduled to consider certification of the Final EIR and approval of the Sustainable Santee Plan at 7:00 pm on Wednesday, August 14, 2019 at Santee City Hall located at 10601 Magnolia Ave., Santee, CA 92071.

If you have any additional questions, please contact me at 619-258-4100, extension 182 or via email at jodonnell@cityofsanteeca.gov.

Sincerely,

John O'Donnell, AICP
Principal Planner

Enclosures: Responses to Comments
Final PEIR DVD

August 16, 2019

Mr. Seth Lichney
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

RE: Sustainable Santee Plan (SCH#2017081030)

Dear Mr. Lichney:

The City of Santee has prepared the Final Program Environmental Impact Report (PEIR) for the Sustainable Santee Plan (Project). You are receiving this letter because you provided comments on the Draft PEIR for the subject Project. In accordance with CEQA Guidelines Section 15088, the City has evaluated all comments on environmental issues received on the Draft PEIR and prepared a written response to each in a "Responses to Comments." Any new information provided in the Final PEIR merely clarifies, amplifies or makes insignificant modifications to the Draft PEIR.

In response to SANDAG's comment of April 26, 2019, the City would consider partnering with SANDAG iCommute program to implement transportation reduction measures after the Sustainable Santee Plan ("SSP" or Climate action Plan ("CAP") is adopted.

The City Council of the City of Santee is scheduled to consider certification of the Final EIR and approval of the Sustainable Santee Plan at 7:00 pm on Wednesday, August 28, 2019 at Santee City Hall located at 10601 Magnolia Ave., Santee, CA 92071.

If you have any additional questions, please contact me at 619-258-4100, extension 182 or via email at jodonnell@cityofsanteeca.gov.

Sincerely,

John O'Donnell, AICP
Principal Planner

August 16, 2019

Mr Eric Lardy, AICP
Chief, Advance Planning Division
Planning & Development Services
County of San Diego
5510 Overland Ave., Suite 310,
San Diego, CA 92123

RE: Sustainable Santee Plan (SCH#2017081030)

Dear Mr. Lardy:

The City of Santee has prepared the Final Program Environmental Impact Report (PEIR) for the Sustainable Santee Plan (Project). You are receiving this letter because you provided comments on the Draft PEIR for the subject Project. In accordance with CEQA Guidelines Section 15088, the City is providing responses to agencies who provided comments on the Draft PEIR.

Any new information provided in this Final PEIR merely clarifies, amplifies or makes insignificant modifications to the Draft PEIR.

The City Council of the City of Santee is scheduled to consider certification of the Final EIR and approval of the Sustainable Santee Plan at 7:00 pm on Wednesday, August 28, 2019 at Santee City Hall located at 10601 Magnolia Ave., Santee, CA 92071.

If you have any additional questions, please contact me at 619-258-4100, extension 182 or via email at jodonnell@cityofsanteeca.gov.

Sincerely,

John O'Donnell, AICP
Principal Planner

Enclosures: Responses to County of San Diego Comments

RESPONSE TO COMMENT LETTER D –

04/29/19 COUNTY OF SAN DIEGO

Response to Comment D-1
While the City will work cooperatively within the regional framework for reducing GHG emissions, the Mast Boulevard extension is an area outside the scope of the Sustainable Santee Plan.

Response to Comment D-2
The third action under Measure 7.4 has been modified to read:

- ☐ Work with community groups, other public agencies and businesses to identify priority areas and install EV-charging stations.

The addition of the public agency to groups that the City would work with and a change of term from “e-chargers” to “EV charging stations” would have no effect on conclusions of the PEIR.

Response to Comment D-3
SolSmart is a national designation system recognizing cities, counties, and regional organizations that foster the development of mature local solar markets. The City would utilize the tools of this program to make its solar permitting process more efficient in coordination with the City’s adoption of an online permitting system.
.

Response to Comment D-4
The City will coordinate with the County on efforts to achieve the solid waste diversion goals after the CAP is adopted.

Response to Comment D-5
The City will collaborate with the County on promoting rainwater harvesting rebates after the CAP is adopted.

Response to Comment D-6
The last action under Measure 6.1 on Page 42 of the SSP is revised to read:

- ☐ Develop a City tree-planting program consistent with the urban forestry management plan (Measure 5.1) and partner with other agencies and groups to plant additional trees.

Response to Comment D-7
Measure 7.5 , Page 53 of the SSP, includes complete streets program and safe routes to schools program designed to encourage walkability.

Response to Comment D-8
The Sustainable Santee Plan is the City’s plan to reduce GHG emissions and does not include specific projects. The plan does not create “on-the ground” projects that will impact MSCP or conservation areas in or adjacent to the City. Implementation of the SSP requires development of new ordinances and policies. The environmental impact of these ordinances and policies will be evaluated at the time they are brought forward for decision.

Response to Comment D-9
Future specific projects located in close proximity to the District trunk sewer line will be forwarded to the County of San Diego for review and comment.

APPENDIX D-2

SECOND LETTER TO THE COUNTY OF SAN DIEGO

CITY OF SANTEE

December 26, 2019

Mr Eric Lardy, AICP
Chief, Advance Planning Division
Planning & Development Services
County of San Diego
5510 Overland Ave., Suite 310,
San Diego, CA 92123

Via E-mail: eric.lardy@sdcounty.ca.gov

RE: Sustainable Santee Plan (SCH#2017081030)

Dear Mr. Lardy:

The City of Santee has prepared the Final Program Environmental Impact Report (PEIR) for the Sustainable Santee Plan (Project). You are receiving this letter because you provided comments on the Draft PEIR for the subject Project. In accordance with CEQA Guidelines Section 15088, the City is providing responses to agencies who provided comments on the Draft PEIR.

On August 16, 2019, the City sent you a letter that provided responses to County comments on the Sustainable Santee Plan and PEIR. Since that time, the City has revised the Sustainable Santee Plan to better differentiate between quantified greenhouse gas reduction measures, and supporting measures as well as provide clear metrics to measure implementation of each measure. These changes require updated responses to County comments.

Any new information provided in the Sustainable Santee Plan, Final PEIR, and this letter merely clarifies, amplifies or makes insignificant modifications to the Draft PEIR.

The City Council of the City of Santee is scheduled to consider certification of the Final EIR and approval of the Sustainable Santee Plan at 7:00 pm on Wednesday, January 8, 2020 at Santee City Hall located at 10601 Magnolia Ave., Santee, CA 92071.

If you have any additional questions, please contact me at 619-258-4100, extension 182 or via email at cjacobs@cityofsanteeca.gov.

Sincerely,

Chris Jacobs
Principal Planner

Enclosures: Responses to County of San Diego Comments

RESPONSE TO COMMENT LETTER D – 04/29/19 COUNTY OF SAN DIEGO

Response to Comment D-1
While the City will work cooperatively within the regional framework for reducing GHG emissions, the Mast Boulevard extension is an area outside the scope of the Sustainable Santee Plan.

Response to Comment D-2
The third action under Measure 7.4 has been reorganized as a Supporting Measure and reads:

> "On or before December 2020: Conduct a study to evaluate the feasibility of installing EV-charging stations on City property."

The addition of the public agency to groups that the City would work with and a change of term from "e-chargers" to "EV charging stations" would have no effect on conclusions of the PEIR.

Response to Comment D-3
SolSmart is a national designation system recognizing cities, counties, and regional organizations that foster the development of mature local solar markets. The City would utilize the tools of this program to make its solar permitting process more efficient in coordination with the City's adoption of an online permitting system.

.

Response to Comment D-4
The City will coordinate with the County on efforts to achieve the solid waste diversion goals after the CAP is adopted.

Response to Comment D-5
The City will collaborate with the County on promoting rainwater harvesting rebates after the SSP is adopted.

Response to Comment D-6
The last action under Measure 6.1 on Page 42 of the SSP is has been reorganized as a Supporting Measure and revised to read:

> "On or before December 2020: Plant trees in City-owned spaces to reduce urban heat island effect and building energy use and increase carbon sequestration, to the extent feasible."

Response to Comment D-7
Measure 6.1 , Page 41 of the SSP, includes active transportation routes (sidewalks and pedestrian paths) from Santee Light Rail Transit station to surrounding residential areas designed to encourage walkability.

Response to Comment D-8
The Sustainable Santee Plan is the City's plan to reduce GHG emissions and does not include specific projects. The plan does not create "on-the ground" projects that will impact MSCP or conservation areas in or adjacent to the City. Implementation of the SSP requires development of new ordinances and policies. The environmental impact of these ordinances and policies will be evaluated at the time they are brought forward for decision.

Response to Comment D-9

Future specific projects located in close proximity to the District trunk sewer line will be forwarded to the County of San Diego for review and comment.