DRAFT MITIGATED NEGATIVE DECLARATION

1.	Name or description of project:	Santee Cannabis Business Ordinance Project The City of Santee (City) proposes a comprehensive Santee Cannabis Business Ordinance (Ordinance or project) amending the City's Municipal Code to regulate cannabis land uses consistent with the Medicinal and Adult-Use of Cannabis Regulation and Safety Act (MAUCRSA) and the Control, Tax, and Regulate the Adult Use of Marijuana Act (AUMA). The Ordinance would implement the provisions of the MAUCRSA to accommodate the needs of people with medical illnesses who need cannabis for medicinal purposes as recommended by their healthcare providers and to provide access to those resources. It would also provide access to adult-use cannabis for people aged 21 and over as authorized by the AUMA while imposing sensible regulations on the use of land to protect City residents, neighborhoods, and businesses from disproportionately negative impacts. The Ordinance would regulate the commercial cultivation, processing, manufacturing, testing, sale, delivery, and distribution of cannabis and cannabis products in a responsible manner to protect the health, safety, and welfare of the residents of the City and to enforce rules and regulations consistent with state law.
2.	Project Location – Identify street address and cross streets or attach a map showing project site (preferably a USGS 15' or 7 1/2' topographical map identified by quadrangle name):	Citywide – specifically within the Light Industrial, General Industrial, and General Commercial zones.
3.	Entity or Person undertaking project:	City of Santee
	A. Entity	
	(1) Name:	Chris Jacobs, Principal Planner
	B. Other (Private)	N/A
	(1) Name:	
	(2) Address:	

The Lead Agency, having reviewed the Initial Study of this proposed project, having reviewed the written comments received prior to the public meeting of the Lead Agency, and having reviewed the recommendation of the Lead Agency's Staff, does hereby find and declare that the proposed project will not have a significant effect on the environment. A brief statement of the reasons supporting the Lead Agency's findings are as follows:

The project is compatible with the Santee General Plan in that it proposes a comprehensive Santee Cannabis Business Ordinance amending the City's Municipal Code to regulate cannabis land uses that would only be allowed in the Light Industrial (IL), General Industrial (IG), and General Commercial (GC) zones/designations in the City. Cannabis facilities would not be located within 900 feet of sensitive receptors, including kindergarten through 12th grade schools, commercial daycare centers, youth centers, religious locations, or parks. The project does not propose any specific development but would allow cannabis facilities to be permitted within the City, consistent with the Ordinance. The City has adequate infrastructure and public services to support the type and intensity of cannabis land uses. The project would be developed in accordance with the Sustainable Santee Plan and would not contribute significantly to greenhouse gas emissions, nor frustrate the intent of state policy relative to greenhouse gas emissions.

All potentially significant environmental impact can be mitigated to less than significant levels through implementation of the mitigation measures identified in the Initial Study. Therefore, the project would not result in significant impacts to the environment.

The Lead Agency hereby finds that the Mitigated Negative Declaration reflects its independent judgment. A copy of the Initial Study is attached.

The location and custodian of the documents and any other material which constitute the record of proceedings upon which the Lead Agency based its decision to adopt this Mitigated Negative Declaration are as follows:

City of Santee, Development Services Department

10601 Magnolia Avenue

Santee, CA 92071

Phone No.:	Chris Jacobs, Principal Planner (619) 258 – 4100, ext 182

Date Received
for Filing: June 3, 2022

Chris Jacobs
Staff

DRAFT

Initial Study/ Mitigated Negative Declaration

Santee Cannabis Business Ordinance

June 2022

Prepared for:

City of Santee
10601 Magnolia Avenue
Santee, California 92071

Prepared by:

600 B Street, Suite 2000
San Diego, California 92101

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Appendices

Acronyms and Abbreviations

AB	Assembly Bill
ADT	average daily trips
Alquist-Priolo	Alquist-Priolo Earthquake Fault Zoning Act
APE	area of potential effect
APN	Assessor's Parcel Number
AUMA	Control, Tax and Regulate the Adult Use Cannabis Act
BMP	best management practice
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
CH_4	methane
City	City of Santee
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of San Diego
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
EIR	Environmental Impact Report
FTA	Federal Transit Administration
GHG	greenhouse gas
HVAC	heating, ventilation, and air conditioning
IS	Initial Study
Ldn	day-night noise level
LEED	Leadership in Energy and Environmental Design
Leq	equivalent energy level
LLG	Linscott, Law & Greenspan, Engineers
LOS	level of service
MAUCRSA	Medicinal and Adult-Use Cannabis Regulation and Safety Act
MCAS	Marine Corps Air Station
MND	Mitigated Negative Declaration
MRZ	mineral resource zone
MS4	municipal separate storm sewer system
MSCP	Multiple Species Conservation Program
N_2O	nitrous oxide
NO	nitric oxide
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NSLU	noise-sensitive land use
O_3	ozone

Ordinance or project	Santee Cannabis Business Ordinance
PDMWD	Padre Dam Municipal Water District
PM_{10}	particulate matter measuring no more than 10 microns in diameter
$PM_{2.5}$	fine particulate matter measuring no more than 2.5 microns in diameter
RAQS	Regional Air Quality Strategy
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCIC	South Coastal Information Center
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SIP	State Implementation Plan
SO_2	sulfur dioxide
SO_x	sulfur oxides
SR-	State Route
SSP	Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions
SWPPP	Stormwater Pollutant Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TIA	Transportation Impact Analysis
VdB	vibration decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound

Document Overview

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared in accordance with California Environmental Quality Act (CEQA) and the CEQA Guidelines for the proposed Santee Cannabis Business Ordinance (Ordinance or project). The primary intent of this document is to (1) determine whether project implementation would result in potentially significant impacts to the environment and (2) incorporate mitigation measures into the project design, as necessary, to eliminate or reduce the project's potentially significant impacts to a less than significant level.

In accordance with CEQA, projects that have the potential to result in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment must undergo analysis to disclose potentially significant effects. The provisions of CEQA apply to California governmental agencies at all levels, including local agencies, regional agencies, state agencies, boards, commissions, and special districts. CEQA requires preparation of an IS for a discretionary project to determine the range of potential environmental impacts of that project and to define the scope of the environment review document. As specified in Section 15064(f) of the CEQA Guidelines, the lead agency may prepare an MND if, in the course of the IS analysis, it is recognized that the project may have a significant impact on the environment but that implementation of specific mitigation measures would reduce potentially significant impacts to a less than significant level. As the lead agency for the project, City of Santee (City) has the principal responsibility for conducting the CEQA environmental review to analyze the potential environmental effects associated with project implementation. During the review process, it was determined that potential impacts would be reduced to a less than significant level with the implementation of mitigation measures. The City has incorporated mitigation measures to reduce or eliminate any potentially significant project-related impacts. Therefore, an IS/MND has been prepared for the project.

Note: The project has not been approved or denied. It is being reviewed for environmental impacts only. Approval of the project can take place only after the MND has been adopted.

This IS/MND is organized as follows:

- **Section 1: Project Description.** This section introduces the document and discusses the project description including location, setting, and specifics of the lead agency and contacts.
- **Section 2: Initial Study Checklist.** This section discusses the CEQA environmental topics and checklist questions, identifies the potential for impacts, and proposes mitigation measures to avoid these impacts.

- **Section 3: List of Preparers.** This section lists the organizations and individuals who were consulted and/or prepared this IS/MND.
- **Section 4: References.** This section presents a list of reference materials consulted during preparation of this IS/MND.

Public Review

The IS/MND will be circulated for a 30-day public review period from June 3, 2022, to July 5, 2022.

Comments regarding this IS/MND must be made in writing and submitted to Chris Jacobs, 10601 Magnolia Avenue, Santee, California 92071 or by email to CJacobs@CityofSanteeCa.gov.

Comments should focus on the proposed finding that the project would not have a significant effect on the environment because revisions or mitigation measures have been made or agreed to by the project proponent. If the commenter believes that the project may have a significant environmental effect, it would be helpful for the commenter to identify the specific effect and explain why the effect would occur and why it would be significant.

Section 1 Project Description

1.1 Project Overview

This section describes the proposed Santee Cannabis Business Ordinance (Ordinance or project) for the public, reviewing agencies, and decision makers.

1.2 Project Location

The City of Santee (City) is a suburban city in eastern San Diego County. The City is part of the East County region and is located approximately 18 miles (19 kilometers) from the Pacific Ocean. The City's regional location is show on Figure 1, Regional Location. The City is connected to the coastline by State Route (SR-) 52, a six-lane freeway that runs from Interstate 5 in La Jolla to SR-67 in El Cajon. The City is intersected by the San Diego River, which is composed of a linear greenbelt that includes parks, trails, and more than 1,100 acres (450 hectares) of natural riparian habitat.

1.3 Project Background

The City proposes a comprehensive Ordinance amending the Santee Municipal Code to regulate cannabis land uses consistent with the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) and the Control, Tax, and Regulate the Adult Use Cannabis Act (AUMA). The Ordinance would implement the provisions of the MAUCRSA to accommodate the needs of people with medical illnesses who need cannabis for medicinal purposes as recommended by their healthcare providers and to provide access to those resources. It would also provide access to adult-use cannabis for people aged 21 and over as authorized by the AUMA while imposing sensible regulations on the use of land to protect City residents, neighborhoods, and businesses from disproportionately negative impacts.

1.4 Proposed Cannabis Ordinance

The Ordinance would regulate the commercial cultivation, processing, manufacturing, testing, sale, delivery, and distribution of cannabis and cannabis products in a responsible manner to protect the health, safety, and welfare of the residents of the City and to enforce rules and regulations consistent with state law and in a fair and equitable manner.

Per MAUCRSA requirements, cannabis facilities cannot be located within 600 feet of sensitive uses, including kindergarten through 12th grade schools, commercial daycare centers, or youth centers. The City has taken a more conservative approach, with the Ordinance prohibiting cannabis facilities from being located within 900 feet of sensitive receptors, including kindergarten through 12th grade schools, commercial daycare centers, youth centers, churches or other places of worship, and recreation facilities, including parks. Figure 2, Sensitive Use Locations with 900-

Foot Buffer, shows the locations of sensitive uses throughout the City along with a 900-foot buffer surrounding each use.

The Ordinance would limit the types of cannabis facilities allowed in the City and the zones in which they would be allowed. Specifically, the Ordinance addresses the following types of land uses: storefront retail with or without delivery, non-storefront retail (delivery only), manufacturing, testing, distribution, and microbusinesses. Storefront retail and delivery is defined as a physical location from which commercial activities are conducted by which sales via delivery may also take place. A microbusiness is defined as a business that is authorized to engage in three of the following four uses: cultivation, distribution, manufacturing, or retail (California Business and Professions Code, Division 10, Section 2600[aj]). Per the Ordinance, the City would only issue cannabis business permits for up to four retailers, including microbusinesses that include retail (storefront or non-storefront) activities. Cultivation is any activity involving the planting, growing, harvesting, drying, curing, grading, or trimming of cannabis. Per the Ordinance, cannabis would be limited to 10,000 square feet of canopy grow and must be within a microbusiness. Manufacturing is a location that produces, prepares, propagates, or compounds cannabis or cannabis products, directly or indirectly, by extraction methods, independently by means of chemical synthesis, or by a combination of extraction and chemical synthesis. Testing labs are the areas where a sample of the cannabis product is tested for quality and safety for human consumption or use. Distribution is the commercial distribution of cannabis and cannabis products from the manufacturer to the retail facility after the product has been certified by a testing lab as being in compliance with state health and safety requirements.

Cannabis facilities would only be allowed in the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones in the City, subject to the City's siting requirements (see Figure 3, Areas Allowing Cannabis Facilities by Zone). The areas located within these zones and outside the 900-foot buffers are for the areas where future cannabis facilities could be permitted under the Ordinance. As shown on Figure 3, these areas are primarily located in the southern area of the City, generally on local streets along the SR-67 and SR-52 corridors, including Mission Gorge Road, Prospect Avenue, and Woodside Avenue.

1.5 Land Use Assumptions

The project does not propose any specific new development; however, it would allow cannabis facilities to be permitted in the City, consistent with the Ordinance. For the purposes of this analysis, a realistic, worst-case scenario was developed to evaluate the project's potential impacts. A total of 20 cannabis facilities— storefront retail and delivery (two locations total), microbusiness with retail (two locations total), microbusiness without retail (two locations total), manufacturing (four locations total), testing (four locations total), and distribution (six locations total)—were assumed to be permitted by the Ordinance. At this time, the specific locations of these facilities

not known, although they would occur in the locations specified on Figure 3. The anticipated proposed land use square footage and allowed zones permitted by the Ordinance are identified in Table 1, Cannabis Facilities Assumptions. These assumptions are based on similar cannabis ordinance projects (City of Cloverdale 2017; Trinity 2019) and industry professional knowledge (Byers, pers. comm. 2022).

Table 1. Cannabis Facilities Assumptions

Land Use Type	Allowed Zones	Square Footage per Facility	Proposed Santee Facilities	Total Square Footage per Land Use Type
Storefront Retail + Delivery	GC, IL, IG	5,000	2	10,000
Microbusiness with Retail (includes retail, distribution, and manufacturing – no cultivation)	GC, IL, IG	10,000	2	20,000
Microbusiness without Retail (includes cultivation,[1] manufacturing, and distribution)	IL, IG	15,000	2	30,000
Manufacturing	IL, IG	3,000	4	12,000
Testing	IL, IG	2,500	4	10,000
Distribution	IL, IG	2,000	6	12,000
Total	**—**		**20**	**94,000**

Notes: GC = General Commercial; IG = General Industrial; IL = Light Industrial

[1] Definition of a microbusiness includes a maximum cultivation canopy of 10,000 square feet.

These land use assumptions do not limit the types or numbers of facilities that could be permitted by the Ordinance. For the purposes of this California Environmental Quality Act (CEQA) analysis, they allow the City to prepare a quantitative analysis of the physical effects of future cannabis facilities based on a realistic, worst-case scenario (20 permitted cannabis facilities). The assumptions are intended to be conservative. For example, the Ordinance would only allow cannabis business permits for up to four retailers, including microbusinesses that include retail (storefront or non-storefront). The land use assumptions identified in Table 1 assume that two of the retail facilities would be storefront retail with delivery and the other two would be microbusinesses with retail. Non-storefront retail (delivery only) was not included in the land use assumptions because it would have fewer vehicle trips than storefront retail with delivery; therefore, if non-storefront delivery is permitted as one of the four retail uses, the impacts would be less than identified in this analysis.

1.6 Ordinance Components

To engage in any cannabis facilities in the City, businesses must obtain a cannabis business permit. Per the Ordinance, the City would only issue cannabis business permits for up to four retailers, including microbusinesses that include retail (storefront or non-storefront) activities. There is no

limit on the number of cannabis business permits that the City may issue to manufacturing facilities, distribution facilities, testing laboratories, or microbusinesses that do not include retail.

The following Ordinance components relate to the project's environmental impacts: operating requirements, security, and odor control.

1.6.1 Operating Requirements

The Ordinance specifies that cannabis facilities with retail or non-storefront retail (delivery) may operate only between the hours of 9:00 a.m. and 9:00 p.m. No cannabis or cannabis products or graphics depicting cannabis or cannabis products would be visible from the exterior of any property issued a cannabis business permit or on any of the vehicles owned or used as part of the cannabis facility. No outdoor storage of cannabis or cannabis products would be permitted. Signage on the exterior of the facility would not be allowed to depict any image of cannabis or cannabis products. Delivery of cannabis and cannabis products would be allowed inside and outside the City. Only indoor cultivation of cannabis would be permitted as part of a microbusiness with no outdoor cultivation allowed. For detailed operating requirements of each cannabis land use, refer to the Ordinance, Sections 7.04.370 through 7.04.440.

1.6.2 Security

The Ordinance, Section 7.04.320, contains various security measures that cannabis facilities would be required to implement, including the following:

- Incorporating perimeter fencing and exterior lighting systems including motion sensors
- Preventing individuals from remaining on premises if they are not directly engaged in an activity related to the permitted operations
- Establishing limited access areas accessible only the authorized cannabis facility personnel
- Keeping all finished goods in a secured and locked vault or vault-equivalent during non-operating hours
- Installing 24-hour security surveillance to monitor all entrances and exits to and from the premises, interior public spaces, and spaces where cannabis or currency is being stored
- Installing sensors to detect entry to and exit from all secure areas
- Installing panic buttons with direct notification to the Sheriff's Department
- Installing bars on windows on the interior of the building only
- Including 24-hour security personnel on site
- Including the capability to remain secure during a power outage such that all access doors are not solely controlled by an electronic access panel to ensure that locks are not released during a power outage
- Restricting entrance areas to be under control of a designated responsible party
- Including accounting software to provide point-of-sale data and audit trails

- Demonstrating to the City compliance with the state's track and trace system for cannabis and cannabis products
- Installing a professionally installed video surveillance system, access control, and intrusion alarm systems certified by Underwriters Laboratories, LLC, designed to protect the inventory, facility, and employees
- Planting and maintaining exterior vegetation to preclude its use as a hiding place for people on the premises
- Installing "mosquitos" (high-pitch frequency devices) as a deterrent to vandalism/loitering

Each cannabis facility would identify a designated security representative who shall serve as the liaison to the City regarding any security related measures or operational issues. In addition, each cannabis facility shall be required to have a storage and transportation plan that describes in detail the procedures for safely and securely storing and transporting all cannabis, cannabis products, any hazardous materials that may be used by the business, and any currency.

1.6.3 Odor Control

The Ordinance, Section 7.04.340(I), requires cannabis facilities to incorporate odor control devices and techniques to ensure cannabis odors are not detectable off site or anywhere outside the facility. Equipment to be installed would include an exhaust air filtration system with odor control that prevents internal odors from being emitted externally. Another alternative would be the installation of an air system that creates negative air pressure between the cannabis facility's interior and exterior so that the odors generated inside the cannabis facility are not detectable on the outside the cannabis facility.

1.7 Regulatory Requirements, Permits, and Approvals

As the lead agency under CEQA, the City has the primary responsibility for approving and carrying out the project and for ensuring that CEQA regulations and all other applicable regulations are met. The project would require approval of several discretionary actions by the City and other responsible agencies, which are listed in Table 2, Discretionary Actions, Permits, and Approvals.

Table 2. Discretionary Actions, Permits, and Approvals

Discretionary Action	Approving Agency
Certification of IS/MND	City
Adoption of Mitigation Monitoring and Reporting Program	City
Adoption of Ordinance	City
Waste Discharge	SWRCB

Notes: IS/MND = Initial Study/Mitigated Negative Declaration; SWRCB = State Water Resources Control Board

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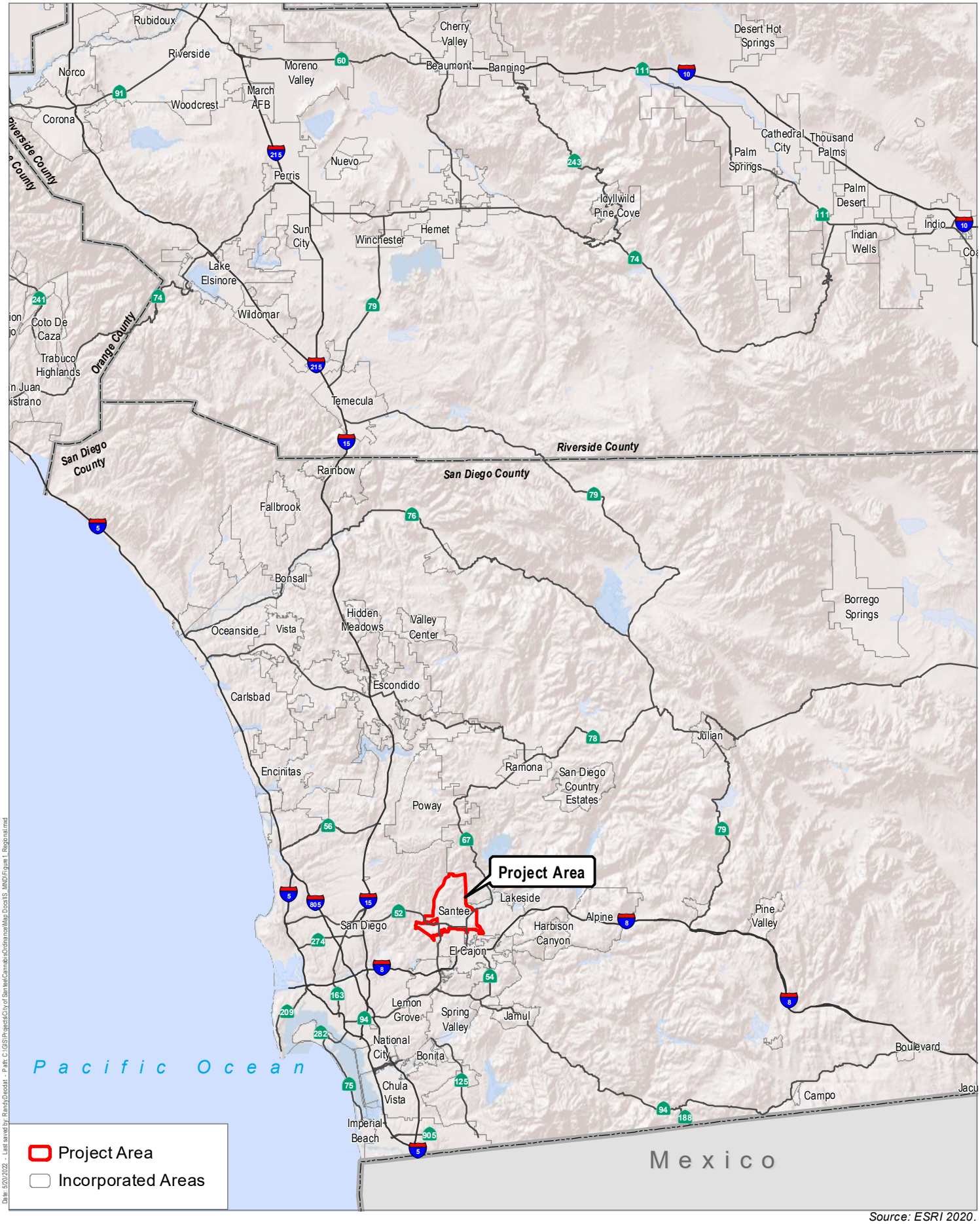

Source: ESRI 2020.

Harris & Associates

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Figure 1

Regional Location

City of Santee Cannabis Business Ordinance

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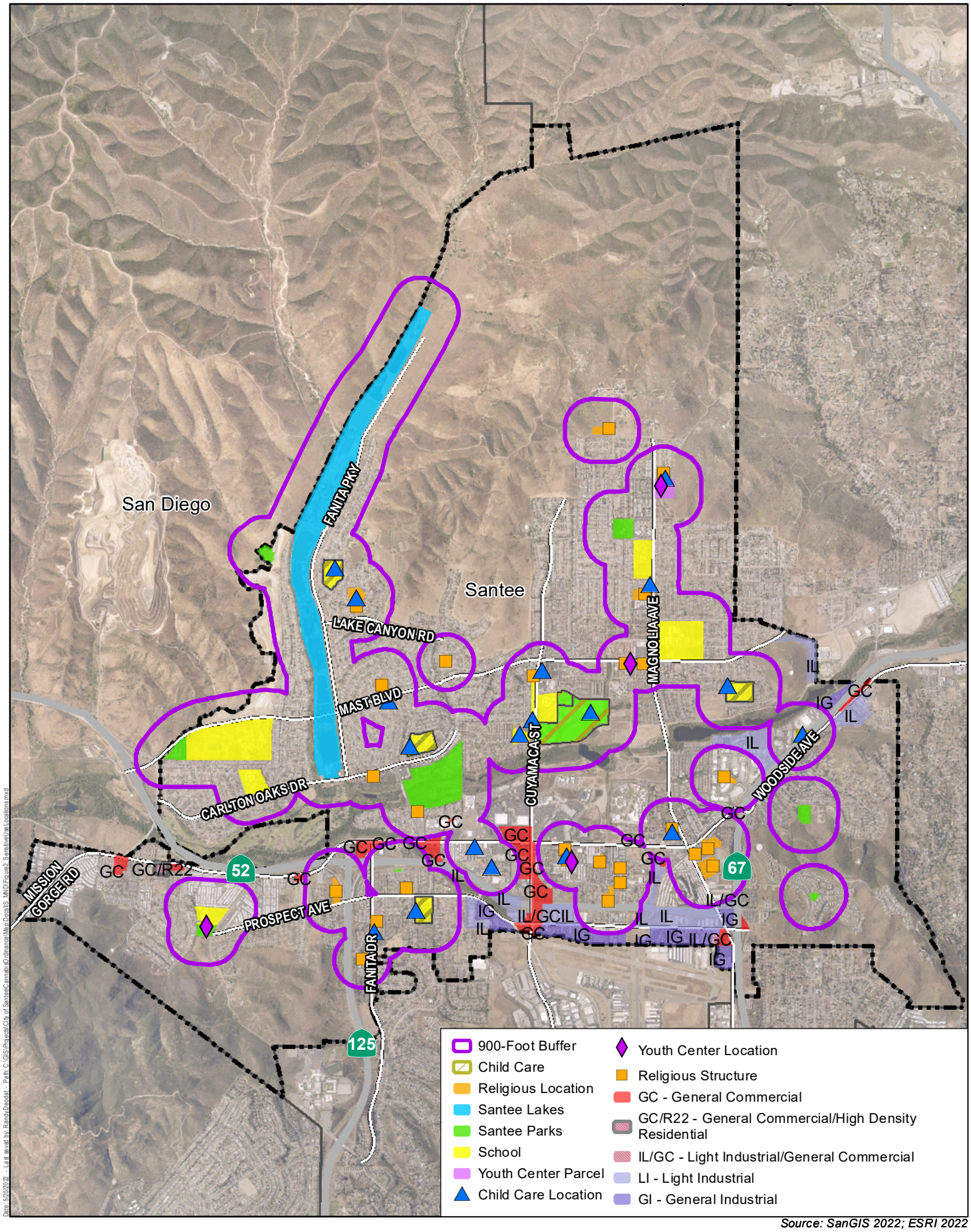

Source: SanGIS 2022; ESRI 2022

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Figure 2

Sensitive Use Locations with 900-Foot Buffer

City of Santee Cannabis Business Ordinance

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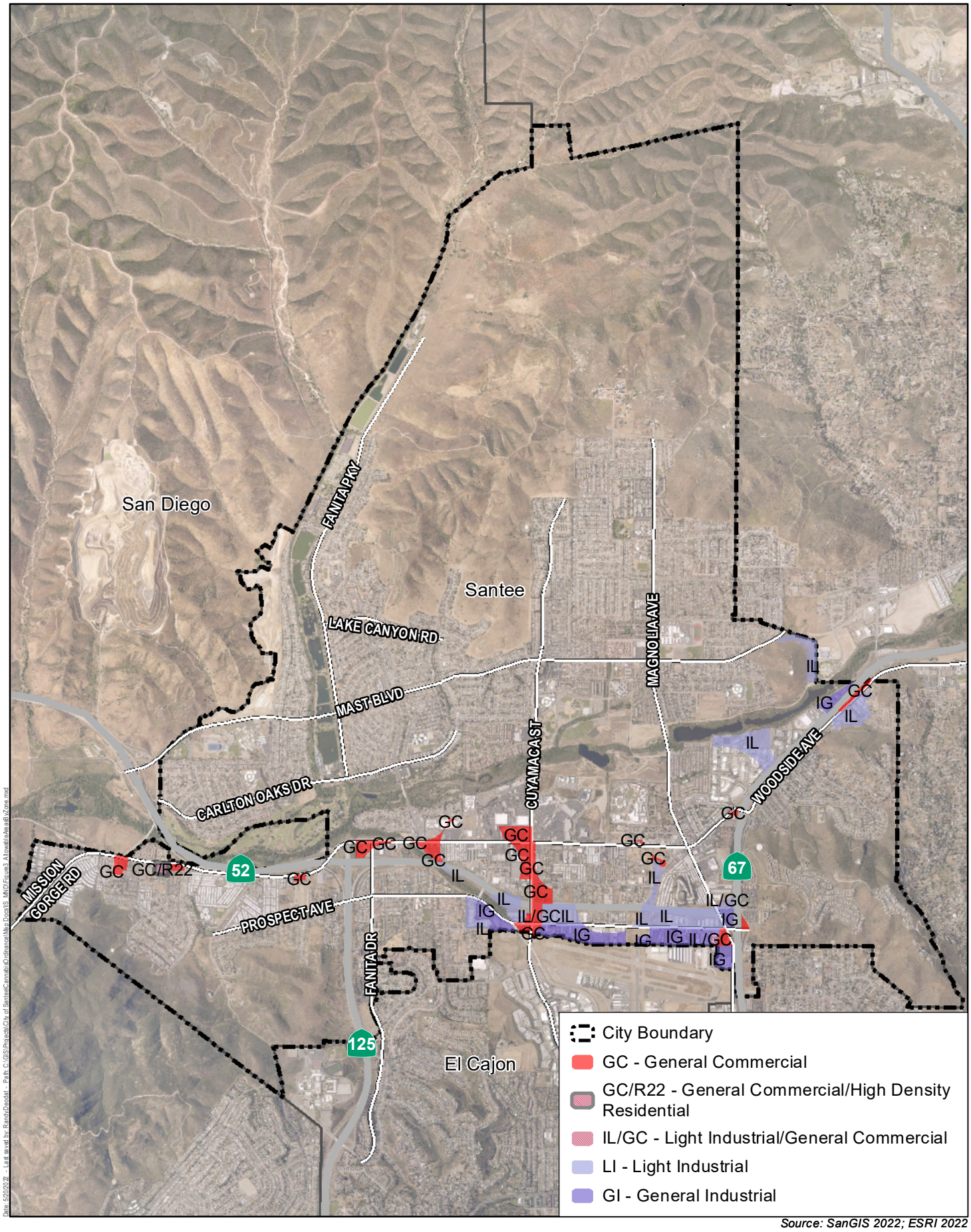

Source: SanGIS 2022; ESRI 2022

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Figure 3

Areas Allowing Cannabis Facilities by Zone

City of Santee Cannabis Business Ordinance

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Section 2 Initial Study Checklist

The following discussion of potential environmental effects was completed in accordance with Section 15063 of the CEQA Guidelines to determine if the project may have a significant effect on the environment.

2.1 Project Information

1. Project title:	Santee Cannabis Business Ordinance
2. Lead agency name and address:	City of Santee Department of Development Services 10601 Magnolia Avenue Santee, California 92071
3. Contact person name, address, and phone number:	Chris Jacobs, Principal Planner 10601 Magnolia Avenue Santee, California 92071 (619) 258-4100 x182 CJacobs@CityofSanteeCa.gov
4. Project location:	City of Santee
5 Project sponsor's name and address:	City of Santee Department of Development Services 10601 Magnolia Avenue Santee, California 92071
6. General Plan designation:	IL (Light Industrial), IG (General Industrial), GC (General Commercial), General Commercial Overlay (GC/IL), Light Industrial Overlay (IL/GC)
7. Zoning:	IL (Light Industrial), IG (General Industrial), GC (General Commercial)
8. Description of project:	Refer to Section 1, Project Description, of this IS/MND.
9. Surrounding land uses and setting:	Refer to Section 1 of this IS/MND.
10. Other public agencies whose approval is required:	State Water Resources Control Board (SWRCB)

11. Have California Native American Tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to Tribal Cultural Resources, procedures regarding confidentiality, etc.?	No consultation has been requested. Refer to Section 2.4.18, Tribal Cultural Resources, of this IS/MND for details.

2.2 Environmental Factors Potentially Affected

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

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

2.3 Lead Agency 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 (state), including implementation of the mitigation measures identified herein. 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 attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Signature
Chris Jacobs, Principal Planner, City of Santee

6-3-22
Date

2.4 Evaluation of Environmental Impacts

This section documents the screening process used to identify and focus on environmental impacts that could result from the project. The checklist portion of the IS begins below and includes explanations of each CEQA issue topic. CEQA requires that an explanation of all answers be provided along with this checklist, including a discussion of ways to mitigate any significant effects identified. The following terminology is used to describe the potential level of significance of impacts:

- **No Impact.** The analysis concludes that the project would not affect the particular resource in any way.
- **Less than Significant.** The analysis concludes that the project would not cause substantial adverse change to the environment without the incorporation of mitigation.
- **Less than Significant with Mitigation Incorporated**. The analysis concludes that it would not cause substantial adverse change to the environment with the inclusion of mitigation agreed upon by the applicant.
- **Potentially Significant.** The analysis concludes that the project could result a substantial adverse effect or significant effect on the environment, even if mitigation is incorporated. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

2.4.1 Aesthetics

Except as provided in Public Resources Code Section 21099, 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. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Setting

The City is primarily composed of 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 visual resource (City of Santee 2003). The orientation of the San Diego River corridor creates impressive long views within the City and to the surrounding ridgelines and mountains, such as 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 (City of Santee 2003). The numerous topographic features of the City and the surrounding vicinity provide distinctive views and vistas from within the developed portions of the City.

Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

Less than Significant Impact. The Santee General Plan Community Enhancement Element describes numerous topographic features in the City and the surrounding vicinity as providing distinctive views and vistas from developed portions of the City. Although the Santee General Plan does not designate specific scenic vista in the City, the Community Enhancement Element describes several areas within and adjacent to the City that provide scenic relief and vistas and backdrops, including views of "scenic undisturbed hills and ridgelines" that surround the City, open space areas, and scenic views of the San Diego River corridor along Mission Gorge Road

(City of Santee 2003). The Community Enhancement Element identifies Mission Gorge Road as a local scenic road and contains Mission Gorge Road Design Standards that establish specific design standards for properties along the Mission Gorge Road corridor. The design standards pertain to the architectural theme of commercial buildings, signage, access, and landscaping and are intended to improve the appearance and enhance the viability of commercial properties within the Mission Gorge Road corridor.

The Ordinance does not specifically propose the development of facilities that would inhibit existing views of scenic areas in the City. Future cannabis facilities permitted under the Ordinance would be subject to existing development standards in the Santee Municipal Code and CEQA. In addition, the Santee General Plan Community Enhancement Element includes a goal to beautify the City to provide for an aesthetically pleasing community: "To respect and integrate the natural and human-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 our citizens." The Ordinance also identifies design guidelines for prospective cannabis facilities. According to Ordinance, Section 7.04.290(D), Zoning and Location Requirements for Cannabis Businesses, the proposed cannabis facilities shall satisfy the following requirements:

- Conform with the City's General Plan, any applicable specific plan, master plan, and design requirements
- Comply with all applicable zoning and related development standards
- Be constructed in a manner that minimizes odors to surrounding uses and promotes quality design and construction and consistency with the surrounding properties
- Be adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping, and all items required for the development
- Be served by roadways adequate in width and improved as necessary to carry the kind and quantity of traffic such use will generate

Future cannabis facilities would only be located in existing commercial and industrial areas (General Commercial [GC], Light Industrial [IL], and General Industrial [IG] zones) primarily on local streets along the SR-67 and SR-52 corridors, including Mission Gorge Road, Prospect Avenue, and Woodside Avenue, that would not obscure any scenic views in these areas with some new businesses expected to be in existing buildings. Therefore, the project would result in less than significant impacts to scenic vistas.

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less than Significant Impact. A portion of SR-52 is an officially designated state scenic highway due to scenic views toward Mission Trails Regional Park, which includes the Mission Trails Summit and Cowles Mountain. About 3.5 miles of SR-52 within the City of San Diego is

designated as a state scenic highway between Mast Boulevard and Santo Road. The entirety of SR-52 is identified as eligible for designation as a state scenic highway between Interstate 5 and SR-67 but has not been officially designated.

The Ordinance does not specifically propose the development of facilities that would adversely affect (directly or indirectly) scenic resources in the City. Sites within the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones along the southern perimeter of the City would have the potential to construct cannabis facilities in proximity to SR-52 but would not be located within the viewshed of the officially designated segment of SR-52, which is 4.1 miles to the west. Future permitted cannabis facilities consistent with the Ordinance would be subject to existing development standards in the Santee Municipal Code and CEQA. Therefore, the project would result in a less than significant impact to scenic resources.

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

Less than Significant Impact. The project is located in an urbanized area and would not conflict with applicable zoning or other regulations governing scenic quality. The Ordinance does not specifically propose the development of facilities that would degrade the visual character of the City. Future cannabis facilities permitted under the Ordinance would comply with the requirements of the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones. The Santee General Plan Community Enhancement Element includes the objective of strengthening the gateways into the City (Objective 10.0) and maintaining and enhancing scenic views (Objective 15.0). The goals are supported by the Policy 10.1, which includes preserving high-quality scenic viewsheds, and Policy 15.2, which provides for the maintenance of view opportunities to surrounding hillsides. In addition, the Santee General Plan Land Use Element includes the objective of ensuring that development in the City is consistent with the overall community character and contributes positively toward the City's image (Objective 11.0). The goal is supported by Policies 11.1 and 11.2, which ensure that all requirements set forth within the Community Enhancement Element are implemented during the development review process and that the design standards for landscaping and site planning are routines updated to provide guidelines for future developments. Future cannabis facilities permitted under the Ordinance would comply with the requirements of the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones. In addition, some of the future cannabis facilities permitted under the Ordinance would be located in existing buildings. Cannabis facilities would be similar in appearance, design, and structure to existing, nearby land uses within the same zone. Therefore, the project would not conflict with applicable zoning or regulations that have been designed to protect scenic quality, and impacts would be less than significant.

d. Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Less than Significant Impact. The Ordinance does not specifically propose the development of facilities that would create a new source of light or glare or that adversely affect day or nighttime views in the City. Future cannabis facilities permitted under the Ordinance would be subject to existing development standards in the Santee Municipal Code and CEQA. In addition, light spillover and glare are regulated by Section 13.30.030(B) of the Santee Municipal Code, which states that all lighting shall be designed and adjusted to reflect light away from any road or street and away from any adjoining premises. The Ordinance, Section 7.04.320(A), Security Measures, requires that proposed cannabis facilities implement sufficient security measures consisting of lighting systems (including cameras and motion sensors), which would have the ability to automatically switch on and off to minimize nighttime lighting. New sources of light or glare would be consistent with the ambient light levels from nearby sources, which include similar commercial and industrial land uses in the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones. Cannabis facilities would not be allowed in residential zones and would not cause light or glare issues in those areas. Therefore, the project would result in less than significant impacts to light or glare and day or nighttime views in the City.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.2 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information 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. 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 4526), 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?	☐	☐	☐	☒

Environmental Setting

The California Department of Conservation Farmland Mapping and Monitoring Program designates the majority of the City as Urban (not Important Farmland) (DOC 2022). No Farmlands of Statewide Importance, Unique Farmlands, or Farmlands of Local Importance occur in the City.

Impact Analysis

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

No Impact. Future cannabis facilities permitted by the Ordinance would be restricted to certain commercial and industrial zones (General Commercial [GC], Light Industrial [IL], and General Industrial [IG] zones) in the City. These areas are primarily designated as Urban/Built-Up Land in the California Important Farmland Finder and do not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2022). Future cannabis facilities permitted under the Ordinance would be consistent with the Santee General Plan and would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use because these farmland designations do not occur in the City. Therefore, no impact would occur.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Ordinance would not conflict with existing zoning for agricultural use or a Williamson Act contract because no agricultural zones or Williamson Act lands are within the City. Therefore, no impact would occur.

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

No Impact. No state forests or lands used for timber production or management are located in the City. Additionally, no zoning designation for timberland or forest resources occur within the City. Therefore, future cannabis facilities permitted by the Ordinance would not conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Future cannabis facilities permitted by the Ordinance would be located in the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones of the City that do not contain forest land. Therefore, the Ordinance would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

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

No Impact. Future cannabis facilities permitted by the Ordinance would be located in the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones of the City that do not

contain farmland or forest land. Adoption of the Ordinance would not 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. Therefore, no impact would occur.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.3 Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	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. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard)?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Setting

Historically, air quality laws and regulations have divided air pollutants into two broad categories: criteria air pollutants and toxic air contaminants (TACs). Criteria air pollutants are a group of common air pollutants regulated by the federal and state governments by means of ambient standards based on criteria regarding health and environmental effects of pollution. TACs are pollutants with the potential to cause significant adverse health effects. The criteria air pollutants pertinent to the analysis are carbon monoxide (CO), nitrogen oxides (NO_x), ozone (O_3), particulate matter (particulate matter measuring no more than 10 microns in diameter [PM_{10}] and fine particulate matter measuring no more than 2.5 microns in diameter [$PM_{2.5}$]), and sulfur dioxide (SO_2).

The City is in the San Diego Air Basin (SDAB) in the San Diego County (County). The climatic classification for the region is a Mediterranean climate, with warm, dry summers and mild, wet winters. The California Air Resources Board (CARB) is part of the California Environmental Protection Agency and is responsible for the coordination and administration of both federal and state air pollution control programs in California. California has adopted ambient standards, the California Ambient Air Quality Standards, that are equal to or stricter than the federal standards for the six criteria air pollutants stated above. The SDAB is non-attainment with the California Ambient Air Quality Standards for O_3, PM_{10}, and $PM_{2.5}$. The SDAB is designated as an attainment area for the state CO, NO, SO_2, lead, and sulfates standards. Hydrogen sulfide and visibility-reducing particles are unclassified in the SDAB.

Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The California State Implementation Plan (SIP) is the document that sets forth the state's strategies for achieving federal air quality standards. The applicable air quality planning documents for the San Diego County Air Pollution Control District (SDAPCD) are the 2016 Regional Air Quality Strategy (RAQS) (SDAPCD 2016) and the Ozone Attainment Plan (SDAPCD 2020), which is the SDAPCD portion of the SIP. The RAQS and Ozone Attainment Plan were prepared by the SDAPCD for CARB to be included as part of the SIP. These plans demonstrate how the SDAB would either maintain or strive to attain the National Ambient Air Quality Standards. Both documents were developed in conjunction with each other by the SDAPCD to reduce regional O_3 emissions.

The SDAPCD relies on information from CARB and San Diego Association of Governments (SANDAG), including projected growth in the County and resulting mobile, area, and other source emissions to project future emissions and to develop appropriate strategies for the reduction of source emissions through regulatory controls. The majority of regional emissions (67 percent) result from motor vehicle emissions. These emissions are reduced primarily through emissions standards, which are established by CARB, but are further reduced at the district level through incentive programs to encourage the use of alternative transportation (SDAPCD 2016). Because of the limited jurisdiction that the SDAPCD has over mobile source emissions and the limited control that individual projects have on influencing the public's ultimate use of motor vehicles, compliance with the RAQS is based on whether or not an individual project would comply with the emissions projections contained in the RAQS. Reduction strategies were applied to the region as a whole and determined to adequately meet the National Ambient Air Quality Standards based on the regional emissions projections. A project that proposes growth that exceeds growth assumptions would potentially conflict with the RAQS and SIP because it would potentially result in mobile source emissions that would exceed the projected emissions inventory.

The CARB mobile source emissions projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities, including Santee, and the County. That is, the emissions estimates that CARB and the SDAPCD use to plan for achieving ambient air quality standards compliance are based on the land uses projected by SANDAG. The use of construction equipment in the RAQS is estimated for the region on an annual basis, and construction-related emissions are estimated as an aggregate in the RAQS. Therefore, the project would not increase the assumptions for off-road equipment use in the RAQS.

Assumptions for land use development used in the RAQS were taken from local and regional planning documents. Emissions forecasts rely on projections of vehicle miles traveled (VMT) by the metropolitan planning organizations, such as SANDAG, and population, employment, and land

use projections made by local jurisdictions during development of the area and General Plans. According to the County's Guidelines for Determining Significance – Air Quality, projects that propose development consistent with or less than the growth projections anticipated by a General Plan would be consistent with the RAQS and SIP because the emissions resulting from these projects have been accounted for in the air quality plans (County of San Diego 2007).

The Santee City Council adopted the Santee General Plan on August 27, 2003. The City adopted a General Plan Amendment Housing Element (Sixth Cycle: 2021–2029) on April 27, 2022. Development consistent with the Santee General Plan and 2022 Housing Element would be consistent with the RAQS and SIP because the 2022 Housing Element's growth projections are consistent with what was projected in the RAQS. Future cannabis facilities permitted by the Ordinance would be located in the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones of the City. The Ordinance prohibits the siting of cannabis facilities outside these zones. The proposed Ordinance would accommodate a new allowable use (cannabis facilities) that is consistent with Santee General Plan growth assumptions for other commercial and industrial uses in the project area.

Moreover, if a project's emissions would exceed regional thresholds for volatile organic compounds (VOCs), NO_x, PM_{10}, or $PM_{2.5}$, it follows that the emissions could cumulatively contribute to an exceedance of a pollutant for which the SDAB is non-attainment (O_3, NO_2, PM_{10}, and $PM_{2.5}$) at a monitoring station in the SDAB. An exceedance of a non-attainment pollutant at a monitoring station would not be consistent with the goals of the RAQS to achieve attainment of pollutants. As discussed below, the project would not exceed significance thresholds for any criteria air pollutants during construction or operation. Therefore, implementation of the project would not exceed the Santee General Plan growth projections for the project area, and the project would not conflict with the RAQS or SIP.

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

Less than Significant Impact. The Ordinance does not specifically propose new development. However, future cannabis facilities permitted under the Ordinance would have the potential to result in construction and operational air pollutant emissions, as described in the following sections.

Construction Emissions

The land use assumptions identified in Table 1 were used to estimate construction emissions for the project. Daily air pollutant emissions during construction were estimated using the assumed worst-case land use assumption data and the emissions factors included in the California Emissions Estimator Model (CalEEMod), version 2020.4.0. Consistent with the Transportation Impact

Analysis (TIA) prepared by Linscott, Law & Greenspan, Engineers (LLG) (Appendix A, Transportation Impact Analysis), 20 future cannabis facilities were modeled throughout the City.

Construction activities associated with development of future cannabis facilities permitted under the Ordinance would have the potential to result in temporary increases in air pollutant emissions. Construction emissions would be generated as fugitive dust from earth disturbance during fine site grading and exhaust emissions from operation of heavy equipment and vehicles during construction. Paving activities would emit VOCs during off-gassing. Development of future cannabis facilities is anticipated to take place over 10 to 15 years. However, for modeling purposes, a worst-case buildout scenario of 12 months was assumed for all 20 cannabis facilities, which concentrates the air pollutant emissions over a shorter duration, resulting in a more conservative analysis.

Table 3, Construction Daily Maximum Air Pollutant Emissions, presents a summary of estimated maximum daily air pollutant emissions for each construction phase anticipated to occur as a result of project implementation.

Table 3. Construction Daily Maximum Air Pollutant Emissions

Construction Phase	Maximum Daily Emissions (pounds/day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition	2	17	14	<1	1	1
Site Preparation	1	16	10	<1	1	1
Grading	2	17	9	<1	8	4
Building Construction	2	16	15	<1	1	1
Paving	1	9	12	<1	<1	V
Architectural Coating	29	1	2	<1	<1	<1
Maximum Daily Emissions	29	17	15	<1	8	4
Significance Threshold	**75**	**250**	**550**	**250**	**100**	**55**
Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

Source: CalEEMod, version 2020.24.0. See Appendix B, Air Quality Technical Report, for model output.

Notes: CO = carbon monoxide; NO_x = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_x = sulfur oxides; VOC = volatile organic compound

Emissions quantities are rounded to the nearest whole number. Exact values are provided in Appendix B.

The construction emissions estimate indicates that anticipated worst-case development (20 facilities) associated with the project would not exceed the significance thresholds for any criteria air pollutants during any phase of construction. Therefore, based on worst-case assumptions, the project would result in a less than significant impact related to air pollutant emissions during construction.

Regarding health effects related to criteria pollutant emissions, the applicable significance thresholds are established for regional compliance with the state and federal ambient air quality standards, which are intended to protect public health from both acute and long-term health impacts, depending on the potential effects of the pollutant (USEPA 2019). Because emissions of criteria pollutants during construction of the project would be below the applicable thresholds, the

project would not contribute to regional acute and long-term health impacts related to non-attainment of the ambient air quality standards.

Criteria pollutants also have the potential to result in health impacts, such as headaches or throat irritation, at the time of exposure. However, individual exposure levels and individual reactions to localized short-term exposure to pollutant emissions from project construction cannot be feasibly determined. The localized level of O_3 that receptors may be exposed to from VOC emissions cannot be determined because the formation of O_3 is not directly determined by the quantity of VOC and NO_x emissions generated by a project (Appendix B, Air Quality Technical Report). The amount of O_3 formed depends on heat and sunlight exposure, and once formed, O_3 is likely to be dispersed or carried away from the site by wind. Conversely, O_3 exposure on the site could have been transported to the site by wind and be attributable to another source. Currently, there are no known methods that can feasibly ascertain the ultimate locations of O_3 formation associated with the emissions of O_3 precursors such as VOC and NO_x (Appendix B). However, because project construction emissions are anticipated to be below the significance thresholds, construction of individual new facilities would be spread out across the City's commercial and industrial zones, and those emissions would be spread out across the anticipated project sites and off site on haul routes, significant adverse acute health impacts as a result of project construction are not anticipated.

Operational Emissions

Operational emissions for the project were also estimated using CalEEMod. Vehicle trip data was obtained from the project's TIA (Appendix A). Area sources of air pollutant emissions associated with new cannabis facilities include fuel combustion emissions from space and water heating, fuel combustion emissions from landscape maintenance equipment, VOC emissions from periodic repainting of interior and exterior surfaces, and natural gas use. Increased volumes of vehicles also contribute to regional emissions of criteria pollutants. The total estimated operational emissions from buildout of allowable uses under the project (worst-case scenario – 20 facilities) are provided in Table 4, Operational Daily Maximum Air Pollutant Emissions. As shown in Table 4, operational emissions from future cannabis facilities would not exceed any of the significance thresholds for maximum daily emissions. Air quality impacts associated with operation of future cannabis facilities consistent with the Ordinance would be less than significant.

Table 4. Operational Daily Maximum Air Pollutant Emissions

Emissions Source	Maximum Daily Emissions (pounds/day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Natural Gas	<1	<1	<1	<1	<1	<1
Landscape	<1	<1	<1	0	<1	<1
Consumer Products	2	0	0	0	0	0
Architectural Coatings	1	0	0	0	0	0
Vehicular Sources	9	6	52	<1	9	3
Total Operational Emissions	**12**	**6**	**52**	<1	**9**	**3**
Significance Threshold	**75**	**250**	**550**	**250**	**100**	**55**
Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

Source: CalEEMod, version 2020.4.0. See Appendix B for model output.

Notes: CO = carbon monoxide; NO_x = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_2 = sulfur dioxide; VOC = volatile organic compound

Emissions quantities are rounded to the nearest whole number. Exact values are provided in Appendix B.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors typically include schools, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions who would be adversely affected by changes in air quality. The proposed Ordinance prohibits cannabis facilities within 900 feet of most sensitive receptors, including schools and daycares. The project is evaluated for the two primary emissions of concern regarding health effects for land development projects, CO and TACs, below.

Carbon Monoxide Hotspots

Areas with high vehicle density, such as congested intersections and parking garages, have the potential to create high concentrations of CO, known as "CO hotspots." Localized CO concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. Under specific meteorological conditions (e.g., stable conditions that result in poor dispersion), CO concentrations may reach unhealthy levels with respect to local sensitive land uses. CO hotspots due to traffic almost exclusively occur at signalized intersections that operate at a level of service (LOS) E or below. A project should be evaluated for the potential to result in or contribute to a CO hotspot if it would worsen traffic flow at signalized intersections operating at LOS E or F with peak-hour trips for the intersection exceeding 3,000 trips (County of San Diego 2007).

Street segment volumes from the TIA (Appendix A) were used to determine potentially congested intersections because intersection volumes were not available. If a street segment on either side of an intersection is free-flowing (LOS D or better), then it is assumed that the intersection would not be congested and a CO hotpot would not occur. According to the TIA (Appendix A), none of the study area street segments would degrade to LOS E or F with the addition of the project. The

addition of project traffic would not cause any degradation of the street segments from existing conditions. Therefore, the project would not have the potential to cause a CO hotspot, and impacts would be less than significant.

Toxic Air Contaminants

According to the County Guidelines for Determining Significance and Report Format and Content Requirements: Air Quality (County of San Diego 2007), diesel particulate matter (DPM) is the primary TAC of concern for typical land use projects that do not propose stationary sources of emissions regulated by the SDAPCD. Based on guidance from the South Coast Air Quality Management District in the Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (SCAQMD 2003), projects that should be analyzed for DPM emissions include truck stops, distribution centers, and transit centers, which could be sources of DPM from heavy-duty diesel trucks.

Based on a review of similar cannabis facilities, future cannabis facilities permitted under the Ordinance would likely include equipment typical of commercial, retail, and light industrial uses that generally do not include stationary sources of emissions regulated by the SDAPCD (Trinity 2019; County of Santa Barbara 2017). Therefore, the primary source of DPM from project implementation would be construction equipment. As shown in Table 3, implementation of the project would not result in particulate matter emissions above the screening level threshold during construction, assuming a conservative development intensity of buildout in approximately 12 months. Construction of future cannabis facilities is anticipated to occur in certain commercial and industrial zones in the City over approximately 10–15 years so that construction would not be concentrated at individual receptors and maximum daily emissions may be reduced compared to the emissions in Table 3. Specific construction schedules and development intensity are currently unknown. Although construction resulting from facilities developed under the proposed Ordinance would occur intermittently over approximately 10–15 years, an individual receptor would only be exposed to short-term emissions from construction of a particular facility within the receptor's immediate vicinity. Additionally, because DPM is considered to have long-term health effects and construction exposure to individual receptors would be a short-term event, emissions would not result in a significant long-term health risk to surrounding receptors.

The project does not propose any specific new development; however, it would allow cannabis facilities to be permitted in the City, consistent with the Ordinance. Operation of future cannabis facilities is anticipated to require some diesel truck trips associated with operational product and business deliveries. In 2004, CARB adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs and their pollutants. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways regardless of where they are registered. The measure does not allow diesel-fueled commercial vehicles to idle

for more than 5 minutes at any given time. Potential localized air toxic impacts from on-site sources of DPM would be minimal since only a limited number of heavy-duty trucks would be anticipated to supply the cannabis facilities due to size limitations in the Ordinance, and the trucks that would frequent the area would not idle for extended periods.

Based on CARB siting recommendations in the Air Quality and Land Use Handbook, a detailed health risk assessment should be conducted for proposed sensitive receptors within 1,000 feet of a warehouse distribution center, 300 feet of a large gas station, 50 feet of a typical gas-dispensing facility, or 300 feet of a dry-cleaning facility that uses perchloroethylene (i.e., PCE), among other siting recommendations (CARB 2005). Additionally, CARB recommends that a health risk assessment be prepared for any sensitive receptors proposed within 500 feet of a highway. Future cannabis facilities permitted consistent with the Ordinance are not anticipated to generate significant truck trips or include land uses that would require a health risk assessment for existing nearby sensitive receptors based on CARB guidance. Based on a review of similar facilities, operation of allowable cannabis facilities under the Ordinance would not include major sources of TACs (Trinity 2019; County of Santa Barbara 2017). In addition, cannabis facilities would be spread throughout the City's commercial and industrial zones and would be prohibited within 900 feet of schools; daycare centers; recreational facilities, including parks; and religious establishments. Therefore, impacts on sensitive receptors would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. Construction of future cannabis facilities consistent with the Ordinance could result in minor amounts of odor compounds associated with diesel-heavy equipment exhaust. However, development of individual facilities would occur throughout the City's General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones, diesel equipment would not be operating together at one time, and construction near existing receptors would be temporary. Additionally, SO_x is the only criteria air pollutant with a strong, pungent odor (ATSDR 2015). As shown in Table 3, maximum construction emissions of SO_x would be less than 1 pound per day, which would be well below the threshold of 250 pounds per day. Therefore, impacts associated with odors during construction would not result in nuisance odors that would result in a significant impact.

CARB's Air Quality and Land Use Handbook (CARB 2005) includes a list of the most common sources of odor complaints received by local air districts. Typical sources of odor complaints include facilities such as sewage treatment plants, landfills, recycling facilities, petroleum refineries, and livestock operations. Cannabis facilities are not listed as a typical source of odor complaints.

The project is the implementation of a cannabis Ordinance that would allow for permitting of cannabis facilities in certain commercial and industrial zones, consistent with the Ordinance. These

uses could include storefront retail and delivery, cultivation, manufacturing, distribution, and testing. The cultivation and processing of cannabis generates odors associated with the plant itself, which during maturation, can produce odors. Odors can be perceived and considered objectionable depending on the size and type of cultivation operation, nearby receptors, strain of cannabis being cultivated, presence of nearby vegetation, and topographic and atmospheric conditions. Under the proposed Ordinance, cultivation would only be allowed indoors and limited to 10,000 square feet of canopy grow within industrial zones (Light Industrial [IL] and General Industrial [IG]) as part of a microbusiness. In addition, under the Ordinance, Section 7.04.340(I), all cannabis facilities would be required to incorporate odor control devices and techniques to ensure odors from cannabis are not detected off site. Cannabis facilities are required to provide a sufficient odor-absorbing ventilation and exhaust system so that odor generated inside the cannabis facility that is distinctive to its operation is not detected outside the facility; anywhere on adjacent property or public rights-of-way; on or about the exterior or interior common area walkways, hallways, breezeways, foyers, lobby areas, or any other areas available for use by common tenants or the visiting public; or within any other unit inside the same building as the cannabis facility. Equipment that may be installed includes an exhaust air filtration system with odor controller or an air system that creates negative air pressure between the building interior and exterior to prevent odors from being detected outside. Therefore, compliance with the proposed Ordinance requirements would reduce potential odors from future cannabis facilities such that they would not adversely affect a substantial number of people. Operational odor impacts would be less than significant.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.4 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 Game 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 Game or US Fish and Wildlife Service?	☐	☒	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e. Conflict with any applicable policies protecting biological resources?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other applicable habitat conservation plan?	☐	☐	☐	☒

Environmental Setting

The following discussion is based on a field reconnaissance survey of sites within the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones that could support future cannabis facilities under the Ordinance in the City conducted by Harris & Associates biologists in March 2022. The survey area is depicted on Figure 4, Survey Areas.

Impact Analysis

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

Less than Significant with Mitigation Incorporated. The project does not propose any specific new development; however, it would allow cannabis facilities to be permitted in the City, consistent with the Ordinance. Future development projects proposed in the City are required to comply with the Santee General Plan Conservation Element goals and policies (City of Santee 2003); Santee Municipal Code, Chapter 13.16 (City of Santee 2022); San Diego River Park Master Plan (City of San Diego 2013); and CEQA. The Santee General Plan Conservation Element identifies and encourages management of the City's natural and human-made resources. The Santee Municipal Code, Chapter 13.16, indicates where permanent open spaces, biological resource protection, and areas restricting major development occur within the City. The San Diego River Park Master Plan provides guidance for development that occurs within a half-mile of a 17.5-mile section of the San Diego River that runs through the Cities of San Diego and Santee (City of San Diego 2013).

Sensitive Plant Species

The vegetation communities and land cover types observed in the survey area include sensitive habitats (Diegan coastal sage scrub; non-native grassland; riparian forest; and San Diego River, Forester Creek, and Sycamore Creek non-vegetated channels), disturbed habitat, and urban/developed land. The sensitive habitats observed in the survey area are depicted on Figure 5, Sensitive Habitats. In addition, some portions of the survey area are fully developed but are adjacent to sensitive habitats, including the San Diego River and Forester Creek riparian corridors (Figure 5).

The sensitive upland and riparian vegetation communities that occur within and adjacent to the survey area provide suitable habitat for federal, state, and locally sensitive plant species. Although the likelihood is low, the disturbed habitat within the survey area could also provide suitable habitat to sensitive plant species. Portions of the survey area that contain urban/developed land are unlikely to support sensitive plant species, and development of these sites would have a less than significant direct impact to sensitive plant species. However, urban/developed land that is adjacent to suitable habitat for sensitive plant species could have a significant indirect impact from edge effects during construction and operation, including invasive plant colonization, trampling, erosion, polluted runoff, and fugitive dust.

Development within portions of the survey area that contain or are adjacent to suitable habitat for sensitive plant species could result in potentially significant direct and indirect impacts to these species, and mitigation measures are required.

Sensitive Wildlife Species

The sensitive vegetation communities that occur within and adjacent to the survey area provide suitable habitat for federal, state, and locally sensitive wildlife species, including nesting birds and raptors protected by the California Fish and Game Code and federal Migratory Bird Treaty Act. Although the likelihood is lower than in higher-quality habitats, the disturbed habitat within the survey area could also provide suitable habitat to sensitive wildlife species. Portions of the survey area that contain

urban/developed land are unlikely to support sensitive wildlife species, and development of these sites would not result in direct impacts to sensitive wildlife species. However, urban/developed land that is adjacent to suitable habitat for sensitive wildlife species, including trees and shrubs for nesting by birds and raptors, roosting by sensitive bats, and refuge for other sensitive mammals, could have a significant indirect impact from edge effects. Construction and operation-related edge effects that could impact sensitive wildlife species include noise, vibration, lighting, increased human activity, erosion, polluted runoff, and trash and garbage, which can attract predators.

Development within portions of the survey area that contain or are adjacent to suitable habitat for sensitive wildlife species, including nesting birds and raptors, could result in potentially significant impacts to these species, and mitigation measures are required.

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

Less than Significant with Mitigation Incorporated. As discussed in Section 2.4.4(a), the survey area includes sensitive upland and riparian vegetation communities, including Diegan coastal sage scrub; non-native grassland; riparian forest; and San Diego River, Forester Creek, and Sycamore Creek non-vegetated channels (Figure 5). In addition, some portions of the survey area that contain non-sensitive land covers, including disturbed habitat and urban/developed land, are adjacent to sensitive vegetation communities, primarily the San Diego River and Forester Creek riparian corridors. The disturbed habitat and urban/developed lands that are adjacent to sensitive vegetation communities could have a significant indirect impact from edge effects during construction and operation, including invasive plant colonization, trampling, erosion, polluted runoff, and fugitive dust.

Development within portions of the survey area that contain or are adjacent to sensitive vegetation communities could result in potentially significant direct and indirect impacts to these communities.

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

Less than Significant with Mitigation Incorporated. The survey area includes or is in proximity to potentially jurisdictional aquatic resources, including the San Diego River, Forester Creek, and Sycamore Creek. In addition, smaller tributary channels, potential wetlands, and other aquatic resources occur in the survey area that require additional investigation to determine their jurisdiction. The San Diego River is defined by the U.S. Army Corps of Engineers as a traditional navigable water (USACE 2022). Forester Creek and Sycamore Creek are tributaries to the San Diego River. These aquatic resources along with any smaller tributaries that occur in the survey area would likely be under the jurisdiction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife, pursuant to

Sections 404 and 401 of the Clean Water Act and Section 1602 of the California Fish and Game Code. However, only the agencies can make a final determination of jurisdictional boundaries.

Portions of the survey area that include urban/developed land are unlikely to contain potentially jurisdictional aquatic resources, and development of these sites would not have a direct impact on protected aquatic resources. However, urban/developed land that is adjacent to potentially jurisdictional aquatic resources, primarily the San Diego River and Forester Creek, could have a significant indirect impact from edge effects during construction and operation, including invasive plant colonization, changes in hydrology, erosion, polluted runoff, and fugitive dust.

Development within portions of the survey area that contain or are adjacent to potentially jurisdictional aquatic resources could result in potentially significant direct and indirect impacts to these protected aquatic resources.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant with Mitigation Incorporated. The San Diego River, portions of which occur adjacent to the survey area, is identified as a wildlife corridor in the Santee General Plan Conservation Element and functions as a movement corridor and nursery site for both common and sensitive wildlife species (City of Santee 2003). In addition, the large area of Diegan coastal sage scrub within and adjacent to the northeastern portion of the survey area likely functions as a wildlife movement corridor and nursery site providing sensitive wildlife species access to and from larger open spaces to the north (Figure 5).

Portions of the survey area that contain disturbed habitat and urban/developed land are unlikely to function as movement corridors or nursery sites, and development of these sites would not result in a direct impact. However, disturbed habitat or urban/developed land that is adjacent to the San Diego River and other large areas of native habitat could have a significant indirect impact from edge effects during construction and operation of future cannabis facilities. These adverse edge effects could include noise, vibration, lighting, increased human activity, erosion, polluted runoff, invasive plant colonization, and trash and garbage, which can attract predators.

Development within portions of the survey area that are adjacent to the San Diego River and other large areas of native habitat within the City could result in potentially significant direct and indirect impacts to these movement corridors and nursery sites.

e. Would the project conflict with any applicable policies protecting biological resources?

No Impact. The City participates in the San Diego Multiple Species Conservation Program (MSCP) under the Natural Community Conservation Planning program and is in the process of preparing a MSCP Subarea Plan (City of San Diego 1998; City of Santee 2003). Future development projects

proposed in the City are required to comply with the Santee General Plan Conservation Element goals and policies (City of Santee 2003); Santee Municipal Code, Chapter 13.16 (City of Santee 2022); San Diego River Park Master Plan (City of San Diego 2013); and CEQA. The development of future cannabis facilities under the Ordinance would be required to comply with these regulations. Therefore, the project would not conflict with any local policies or ordinances protecting biological resources. No impact would occur.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other applicable habitat conservation plan?

No Impact. The Draft Santee MSCP Subarea Plan has not been approved, and the City does not have an adopted Habitat Conservation Plan. Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. No impact would occur.

Mitigation Measures

Mitigation Measures BIO-1 through BIO-3 would be implemented to reduce impacts to sensitive plant and wildlife species by requiring site-specific surveys to adequately evaluate potential direct or indirect impacts to specific species. Mitigation Measures BIO-4 and BIO-5 would be implemented to reduce impacts to sensitive vegetation communities by requiring the preservation of habitat, habitat creation, or enhancement through mitigation ratios. Mitigation Measure BIO-6 would be implemented to reduce potential impacts to nesting birds by requiring pre-construction surveys to ensure construction would not adversely affect nesting bird behavior. Mitigation Measures BIO-7 and BIO-8 would be implemented to reduce impacts to jurisdictional aquatic resources by requiring an aquatic resources delineation and permitting through the wildlife agencies to avoid, minimize, and/or mitigate impacts. Mitigation Measure BIO-9 would be implemented during construction to avoid sensitive biological resources known to occur in or adjacent to future cannabis facility sites. Implementation of Mitigation Measures BIO-1 through BIO-9 would reduce biological resources impacts to a less than significant level.

Sensitive Plant and Wildlife Species

Surveys/Habitat Assessments

BIO-1: Biological Resources Survey/Habitat Assessment. For future cannabis facilities proposed on an undeveloped site, a site-specific biological resources survey shall be conducted during the project design phase. The biological resources survey shall be conducted by a qualified biologist approved by the City of Santee and shall include but not be limited to the following:

- An analysis of available literature and biological databases, such as the California Natural Diversity Database, to determine sensitive biological resources reported historically in the project vicinity.
- A review of current land use and land ownership within the project vicinity.
- An assessment and mapping of vegetation communities present within the project vicinity. If vegetation community mapping has not been conducted on the site in the previous 3 years, updated vegetation mapping shall be conducted by a qualified biologist as part of the project planning and environmental review process. Vegetation communities shall be mapped according to the California Department of Fish and Wildlife's A Manual of California Vegetation (2021) at the alliance level, and a crosswalk table with Holland (1986) vegetation communities shall be provided.
- A general assessment of the potential for aquatic resources, including wetlands and riparian habitats, to occur on site.
- An evaluation of potential local and regional wildlife movement corridors.
- If the project site supports vegetation communities that may provide habitat for sensitive plant or wildlife species, a focused habitat assessment shall be conducted by a qualified biologist to determine the potential for sensitive plant or wildlife species to occur in or adjacent to the project site.
- The results of the biological survey shall be presented in a biological resources survey letter report and submitted to the City of Santee for review.

BIO-2: **Sensitive Plant Species Surveys**. If one or more sensitive plant species has the potential to occur on a project site during implementation of Mitigation Measure BIO-1, focused sensitive plant species surveys shall be conducted before construction to determine the presence and absence of these species to adequately evaluate potential direct or indirect impacts.

Sensitive plant species surveys shall be conducted by a qualified botanist (or biologist) during the appropriate season to detect species as part of the project design phase. Surveys shall be floristic in nature and include lists of the plants identified in the survey area. Surveys shall be conducted on foot, employing a level of effort sufficient to provide comprehensive coverage. The locations and prevalence (estimated total numbers and percent cover, as applicable) of sensitive plants shall be recorded. The sensitive plant species surveys shall be valid for 3 years.

If site-specific surveys are not required because a survey was conducted within the last 3 years, impact assessment and minimization and mitigation requirements shall be based on the most recent available survey. These requirements shall also include an analysis of the potential for sensitive plant species to occur on site based on existing site conditions.

If sensitive plant species are observed, they shall be avoided if possible. If species cannot be avoided, impacts shall be mitigated through conservation of habitat that supports the impacted species in accordance with Mitigation Measures BIO-4 and BIO-5. Mitigation for impacts to federally or state-listed sensitive plant species may require additional mitigation as determined by the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife.

BIO-3: **Sensitive Wildlife Species Surveys**. If one or more sensitive wildlife species have the potential to occur on a project site during implementation of Mitigation Measure BIO-1, focused sensitive wildlife species surveys (and/or protocol surveys, if applicable) shall be conducted before construction to determine the presence and absence of these species to adequately evaluate potential direct or indirect impacts.

Sensitive wildlife species surveys (and/or protocol surveys, if applicable) shall be conducted by a qualified biologist during the appropriate season to detect species as part of the project design phase. Surveys shall be focused on the target sensitive wildlife species and include lists of the other wildlife species and specific habitats identified in the survey area. Surveys shall be conducted on foot, employing a level of effort sufficient to provide comprehensive coverage. Protocol surveys, if required, shall be conducted consistent with the specific protocol method. The locations and observed behaviors of sensitive wildlife shall be recorded. The sensitive wildlife species surveys shall be valid for 3 years (or for the period specified in the protocol survey methods).

If site-specific surveys are not required because a survey was conducted within the last 3 years, impact assessment and minimization and mitigation requirements shall be based on the most recent available survey. These requirements shall also include an analysis of the potential for sensitive wildlife species to occur on site based on existing site conditions.

If sensitive wildlife species are observed, they shall be avoided if possible. If species cannot be avoided, impacts shall be mitigated through conservation of habitat that supports the impacted species in accordance with Mitigation Measures BIO-4 and BIO-5. Mitigation for impacts to occupied habitat for federally or state-listed sensitive wildlife species (specifically coastal California gnatcatcher [*Polioptila californica californica*] or least Bell's vireo [*Vireo bellii pusillus*]) may require additional mitigation as determined by the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife.

Sensitive Vegetation Communities

Permanent Impacts

If a project would result in permanent impacts to sensitive vegetation communities, sensitive plant species, and/or sensitive wildlife species as identified during implementation of Mitigation

Measures BIO-1 through BIO-3, Mitigation Measure BIO-4 would be implemented to reduce impacts to a less than significant level.

BIO-4: Permanent Impacts to Sensitive Vegetation Communities. Permanent impacts to sensitive vegetation communities shall be mitigated through the preservation of habitat, habitat creation, or enhancement, or a combination thereof, in the City of Santee or off site through habitat acquisition and preservation or purchase of credits from an approved conservation bank. Mitigation for impacts to sensitive vegetation communities shall be in kind, specifically using native grasses for impacts to non-native grassland. Permanent impacts to sensitive vegetation communities shall be mitigated at a ratio of at least 1:1, as approved by the City of Santee.

For on-site mitigation, a detailed Mitigation Plan shall be prepared before the start of construction (not applicable to mitigation met through the purchase of credits from an approved mitigation bank). The Mitigation Plan shall include at a minimum the proposed location of the mitigation areas, site preparation, a plant palette, installation procedures, success criteria, fencing and signage, monitoring requirements, and other details of the habitat restoration effort. The Mitigation Plan shall be prepared by a qualified biologist approved by the City of Santee.

Temporary Impacts

If a project would result in temporary impacts to sensitive vegetation communities, sensitive plant species, and/or sensitive wildlife species as identified during implementation of Mitigation Measures BIO-1 through BIO-3, Mitigation Measure BIO-5 would be implemented to reduce impacts to a less than significant level.

BIO-5: Temporary Impacts to Sensitive Vegetation Communities. Temporary impacts to sensitive vegetation communities shall be restored in place or elsewhere on the project site at a minimum of a 1:1 replacement ratio, specifically using native grasses for impacts to non-native grassland.

A Revegetation Plan shall be prepared. The Revegetation Plan shall include site preparation specifications, a plant palette, installation procedures, development of reasonable success criteria, appropriate monitoring and reporting protocols, implementation timelines, and contingency measures in the event of restoration failure. The City of Santee shall provide guidance for and oversight of the Revegetation Plan and implementation.

Temporarily disturbed non-native grassland areas shall be revegetated with local native plant species as soon as construction is complete to reduce erosion and to inhibit the establishment of non-native and invasive weeds.

In the event that sensitive vegetation communities cannot be restored in place or elsewhere on the project site after construction, these impacts shall be considered permanent, and Mitigation Measure BIO-4 shall be implemented instead.

Nesting Birds

Implementation of Mitigation Measure BIO-6 would require pre-construction nesting bird surveys to reduce potential impacts to nesting birds protected by the California Fish and Game Code and Migratory Bird Treaty Act.

BIO-6: **Pre-Construction Nesting Bird Surveys.** To the extent feasible, grubbing, trimming, or clearing of vegetation from the project site shall not occur during the general bird nesting season (January 15 through September 15). If grubbing, trimming, or clearing of vegetation cannot feasibly occur outside the general bird nesting season, a qualified biologist approved by the City of Santee shall perform a pre-construction nesting bird survey in the areas on the project site with vegetation supporting nesting birds. Nesting bird surveys shall occur within 10 days before the start of vegetation clearing or grubbing to determine if active bird nests are present. If no active bird nests are identified on the project site or within a 300-foot buffer of the project site, no further mitigation is necessary. If active nests of bird species covered by the California Fish and Game Code and Migratory Bird Treaty Act are detected on the project site during the 10-day pre-construction survey, construction activities shall stay outside a 300-foot buffer around the active nest. For raptor species, this buffer shall be expanded to 500 feet. It is recommended that a biological monitor be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by construction activity. Once the young have fledged and a qualified biologist has determined the nest is inactive, normal construction activities can occur.

If construction begins within the nesting season adjacent to or within occupied coastal California gnatcatcher (*Polioptila californica californica*) or least Bell's vireo (*Vireo bellii pusillus*) habitat, noise monitoring or noise attenuation measures approved by the City of Santee must occur.

Jurisdictional Aquatic Resources

In the event that state- or federally protected jurisdictional aquatic resources are identified during implementation of Mitigation Measure BIO-1, Mitigation Measures BIO-7 and BIO-8 shall be implemented.

BIO-7: **Aquatic Resources Delineation.** If sensitive aquatic resources are identified on a project site, a qualified biologist shall conduct an aquatic resources delineation following the methods outlined in the 1987 U.S. Army Corps of Engineers Wetland Delineation Manual

and the Regional Supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual: Arid West Region to map the extent of wetlands and non-wetland waters, determine jurisdiction, and assess potential impacts. The results of the delineation shall be presented in an Aquatic Resources Delineation Report and shall be incorporated into the California Environmental Quality Act documents required for approval and permitting of the project.

BIO-8: **Aquatic Resources Permitting.** If the project cannot avoid impacts to sensitive aquatic resources, permits and authorizations shall be obtained from the regulatory agencies, including U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. The regulatory agency authorizations would include impact avoidance and minimization measures and mitigation measures for unavoidable impacts. Specific avoidance, minimization, and mitigation measures for impacts to jurisdictional aquatic resources shall be determined through discussions with the regulatory agencies during the project permitting process and may include monetary contributions to a mitigation bank or habitat creation, restoration, or enhancement.

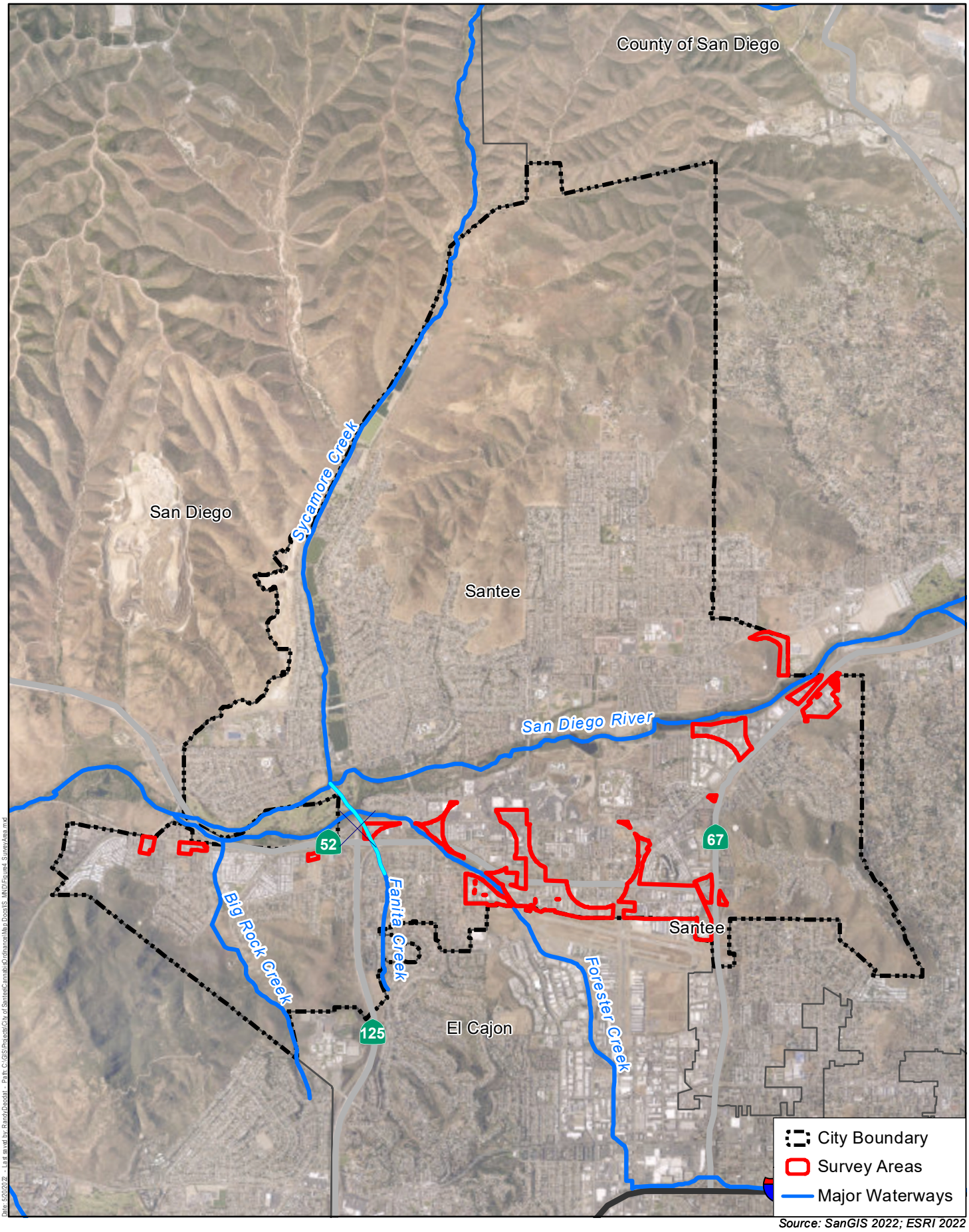
Construction Practices

For projects that are determined to result in impacts to sensitive biological resources during implementation of Mitigation Measure BIO-1, Mitigation Measure BIO-9 shall be implemented.

BIO-9: **Construction Practices.** If sensitive biological resources are known to occur in or adjacent to the project site, the following measures shall be implemented prior and during project construction.

- **Contractor Training Program.** A project-specific contractor training program shall be developed and implemented to educate contractors about the sensitive biological resources on and adjacent to the project site and the measures being implemented to avoid or minimize impacts to these resources. A qualified biologist approved by the City of Santee shall develop and implement the contractor training program.
- **Flagging, Fencing, and Demarcation.** The project proponent, in consultation with the qualified biologist, shall designate the limits of the construction area adjacent to sensitive biological resources using fencing, signage, or stakes in the field and review the placement of fencing, signage, or stakes with the contractor in accordance with construction plans. Aquatic resources within 50 feet of the construction area, where accessible and feasible, shall also be demarcated in the field and avoided by construction personnel and activity.
- **Weed Control.** The project proponent shall implement the following weed control methods to minimize the establishment and spread of non-native and invasive weed species on the project site during construction activities:

- Seeds and plant materials used for revegetation shall be certified weed free.
- Straw materials, such as those used for erosion control, shall be certified weed free.
- Construction vehicles and equipment shall not be allowed to enter the right-of-way with excessive mud or other debris that may hold non-native/invasive weed seeds. Equipment shall be power-washed prior to entry.



Source: SanGIS 2022; ESRI 2022

Harris & Associates

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Figure 4

Survey Areas

City of Santee Cannabis Business Ordinance

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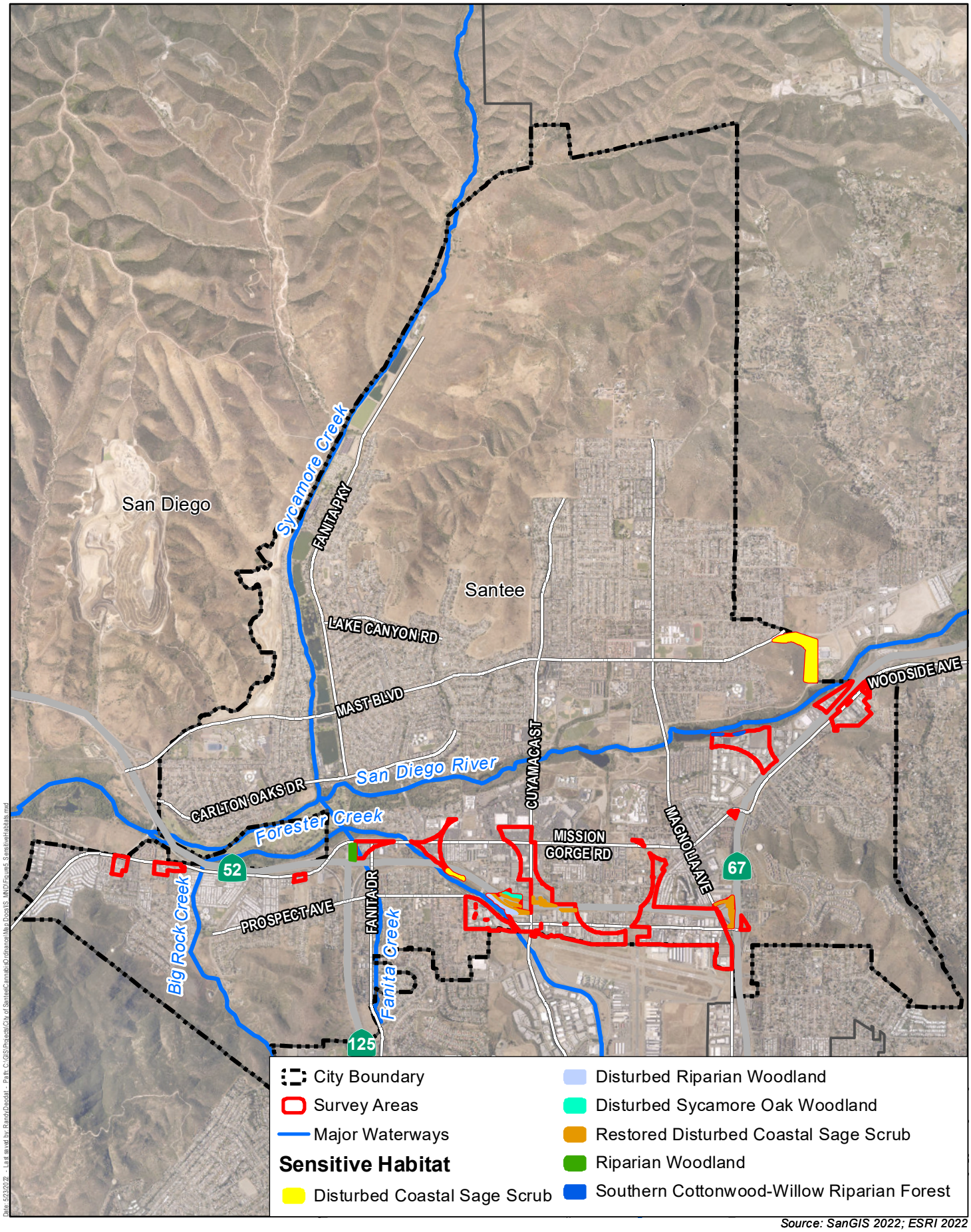

Source: SanGIS 2022; ESRI 2022

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Figure 5

Sensitive Habitat

City of Santee Cannabis Business Ordinance

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2.4.5 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 pursuant to Section 15064.5?	☐	☒	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Environmental Setting

Cultural resources are found throughout the City and are reminders of the City's historical record. Cultural resources are the tangible or intangible remains or traces left by prehistoric or historical people who inhabited the San Diego region. They encompass both the built (post-1769) and the archaeological environments, as well as Traditional Cultural Properties. They are typically in protected areas near water sources and multiple ecoregions and can include Traditional Cultural Places, such as gathering areas, landmarks, and ethnographic locations. The following discussion is based on a cultural background check from the South Coastal Information Center (SCIC), and a field reconnaissance survey of sites within the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones that could support future cannabis facilities under the Ordinance (area of potential effect [APE]) conducted by a Harris & Associates archaeologist in April 2022. Known historical and archaeological sites are present within the APE. The impact analysis below provides a discussion of identified resources.

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less than Significant with Mitigation Incorporated. Known historical resources (built environment) are present within the APE. Structures are identified on the quad maps from 1939 (El Cajon), 1953 (La Mesa), and 1955 (El Cajon); however, structures are not identified on the 1903 (Cuyamaca) quad map. The locations of Mission Gorge Road and SR-67 are identified on the Historic Roads Map for the period of 1769–1885. The SCIC background search identified the following historic addresses in the project area (Table 5, Historic Addresses).

Table 5. Historic Addresses

Address	APN	National Register Status	Primary Number	Construction Date	Architectural Style
8714 Cuyamaca Street	384-311-24-00	6Z	[1]	1950	Vernacular/Utilitarian
8865 Cuyamaca Street	384-041-55-00	6Z	P-37-035505	1964	Modern/Industrial
8822 Fanita Drive	383-12-40-00	6Z	[1]	1948	Mid-20th Century Tract House
8628 Hacienda Road	384-161-41-00	6Z	[1]	1925	Spanish Eclectic
8645 Hacienda Road	—	6Z	[1]	1932	Mid-20th Century Vernacular
8651 Hacienda Road	384-161-35-00	6Z	[1]	1932	Bungalow
8657 Hacienda Road	384-161-34-00	6Z	[1]	1925	Craftsman Bungalow
8663 Hacienda Road	384-161-31-00	6Z	[1]	1930	Craftsman Bungalow
8622 Kitty Lane	384-260-19-00	[1]	[1]	1920	Bungalow
9908 Prospect Avenue	384-161-09-00	[1]	[1]	1948	Post War
8633 Railroad Avenue	[1]	[1]	[1]	1930	Vernacular
8661 Railroad Avenue	[1]	[1]	[1]	1902	National Style with Late Queen Anne and Classical Revival Elements
8671 Railroad Avenue	[1]	[1]	[1]	1920	Simplified Bungalow
8634 Siesta Road	384-260-15-00	[1]	[1]	1925	Pyramidal Bungalow

Notes: APN = Assessor Parcel Number

6Z = Found Ineligible for National Register, California Register, or local designation through survey or professional evaluation

[1] Information not provided

Only one historic address (8865 Cuyamaca Street) has been recorded on California Department of Parks and Recreation forms. It is described below based on information obtained through the SCIC background check.

8865 Cuyamaca Street/P-37-035505

P-37-035505 was recorded in 2013 by ACE Environmental, LLC (Shannon Loftus). The building is a rectangular warehouse type of utilitarian structure that is best described as Modern Industrial. The building is a composite of a historic-era square shaped one-and-a-half story structure with rear addition of similar size and shape. The building is constructed of a variety of materials, including reinforce brick, and includes a possible tilt-up rear addition with brick veneer. The building is heavily modified, and historical purposes and/or function are unrecognizable. It is suggested that the building was used as a warehouse in the past.

The building was evaluated against the four criteria of the National Historic Preservation Act and determined to not appear to be historically significant. The building is neither associated with an event contributing to the broad patterns of our history (Criterion A) nor associated with a person of historical significance (Criterion B). The building architectural style and execution are neither unique nor

representative of the work of a master (Criterion C). Lastly, the building does not appear likely to yield information that would contribute to the general understanding of our past (Criterion D).

Of the historic addresses listed in Table 5, several architectural styles are identified (Vernacular/Utilitarian, Modern/Industrial, Mid-20th Century, Spanish Eclectic, Mid-20th Century Vernacular, Bungalow, Craftsman Bungalow, Post War, National Style with Late Queen Anne and Classical Revival Elements, Simplified Bungalow, and Pyramidal Bungalow). The structures were constructed between 1902 and 1964. Seven (National Register Status 6Z) have been evaluated and determined ineligible for listing on the National or California Registers or for local designation. As such, modifications to these structures would not be a significant impact. The balance of structures has not been evaluated; therefore, a change in the interior building use to cannabis use would not cause a direct impact. However, any modification to the exterior of the building could cause a direct impact to the significance of the resource. Impacts to the exterior of the structures of the historic addresses not previously evaluated would be potentially significant.

The Harris & Associates archaeologist surveyed areas of the City that would be allowable for cannabis facilities under the proposed Ordinance, herein referred to as the "survey area," on April 2, 2022 (Figure 4, Survey Area). The survey included both developed (windshield survey) and undeveloped areas. Structures over 50 years in age that have the potential to be historical resources were identified in the developed areas of the survey area. These resources were photographed; however, they were not evaluated for significance. As such, significance is assumed. A change in the interior building use to cannabis use would not cause a direct impact; however, any modification to the exterior of the building could cause a direct impact to the significance of the resource. This impact would be potentially significant.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than Significant with Mitigation Incorporated. Known archaeological resources are present within the APE as indicated in Table 6, Archaeological Resources (SCIC 2022).

Table 6. Archaeological Resources

Primary Number	Site Number	Chronological Placement	National Register Status
37-000141	CA-SDI-141	Unknown	[1]
37-009242	CA-SDI-9242	Prehistoric	6Y
37-039090	CA-SDI-22955	Prehistoric and Historic	[1]

Notes: 6Y = Determined ineligible for National Register by consensus through Section 106 process – not evaluated for California Register or local listing

[1] Information not available

Three archaeological resources were identified and include CA-SDI-141, CA-SDI-9242, and CA-SDI-22955. Each is described below based on information obtained through the SCIC background check.

CA-SDI-141/P-37-000141

CA-SDI-141 was recorded by Treganza (no date). The California Department of Parks and Recreation form provides general location data, but no information regarding chronology or identified resources is provided.

CA-SDI-9242/P-37-009242

CA-SDI-9242 was recorded by Anna Noah in 1982. It is a prehistoric habitation site where tool manufacturing and maintenance and food processing occurred. A Phase I and Phase II excavation (seven backhoe trenches, 10 test units) was conducted in 1986 by the California Department of Transportation (Corum) for the right-of-way for SR-52. Corum identified that a portion of the site was destroyed by construction of Mission Gorge Road. A large number (n=4,465) of prehistoric artifacts (2,377 debitage, 20 cores, four hammerstones, three marine shell fragments, and 830 fragments of mammal, bird, and fish bone) were recovered. Based on materials recovered through testing, it was determined that the site functioned as a seasonal base camp. Additional testing was conducted in 1990 by ERC Environmental (Danielle Huey and Edward Baker) for the East Mission Gorge Interceptor Pump Station and Force Main Project. Two 1x1 meter units and shovel test pits were excavated on the eastern quarter of the site. A total of 187 artifacts (39 flakes, 143 angular waste, two core tools, two hammerstones, and one mano) were recovered. ERC Environmental determined the site to be significant because of its multicomponent attributes.

CA-SDI-22955/P-37-039090

Site CA-SDI-22955 was recorded in 2019 by Rincon Consultants (Mark Strother and Kent Smolik). It is a multicomponent site composed of both prehistoric and historic elements. Prehistoric components include 11 milling features (slicks and basins) and a low-density artifact scatter (flaked and ground stone artifacts, faunal bone, shell, Tizon brownware ceramics, and fire-affected rock). Historic components include seven historic period features (concrete pads and foundations, chimney, ceramic drainage pipe, and rock and mortar retaining wall) that represent the remnants of the historical Santee School. A large, low-density scatter of historic and modern materials (glass, concrete and mortar fragments, brick, clay, metal, particle board, ceramics, glass button, bullet casing, chalk, pencil lead, and plastic). None of the historic/modern materials were temporally diagnostic. The school was initially constructed in 1891, rebuilt in the 1950s, and demolished in the 2000s. Subsurface testing indicates a high level of disturbance with the intermixing of prehistoric, historic, and modern materials.

During Phase II testing, lithics were recovered from up to 80 centimeters below surface. Obsidian hydration was conducted on two flakes that returned dates of 1,571 BP and 1,037 BP, suggesting occupation in the Intermediate and Late Prehistoric periods.

A Harris & Associates archaeologist conducted a cultural survey on April 2, 2022 (Figure 4, Survey Area). A pedestrian survey (10- to 15-meter transects) was completed for the undeveloped parcels within the survey area. Some undeveloped areas were inaccessible due to fencing and locked gates and were not surveyed. One archaeological resource was identified during the survey. It is likely a part of or extension of CA-SDI-22955. The site displays numerous bedrock milling elements and lithic debitage and Buffware ceramics consistent with the Late Prehistoric period. Recordation of the resource was not completed as part of the survey. Because there are identified known resources and because the undeveloped parcels are within the Traditional Use Area of the Kumeyaay Native American Tribes, there is the potential for the presence of buried resources; as such, any earth-disturbing activities could cause a direct impact to the significance of the resource. Therefore, this impact would be potentially significant.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact. No known human remains are present within the APE based on the background information provided by the SCIC and the pedestrian survey that was conducted by Harris and Associates. As such, no direct impacts would occur. However, the project would be subject to California Public Resources Code, Section 5097.98; CEQA Guidelines, Section 15064.5; and California Health and Safety Code, Section 7050.5, should human remains be identified during earth-disturbing activities. Therefore, this impact would be less than significant.

Mitigation Measures

Mitigation Measure CUL-1 would be implemented to reduce impacts to historical resources by requiring a historical evaluation of structures 50 years or older to identify and mitigate potentially significant historical resources. Mitigation Measures CUL-2 and CUL-3 would be implemented to reduce impacts to archaeological resources by requiring a contractor training program and site-specific cultural survey to identify and mitigate potentially significant archaeological resources. Mitigation Measures CUL-1 through CUL-3 would reduce potentially significant impacts to cultural resources to a less than significant level.

Historical Resources

CUL-1: Historical Evaluation. For future cannabis facilities proposed in the City of Santee on developed land with structures identified in Table 5, Historic Addresses, of the Initial Study/Mitigated Negative Declaration for the project that have not been evaluated for significance, or properties with structures 50 years or greater in age, a site-specific

historical resources evaluation shall be conducted during the project design phase. The historical evaluation shall be conducted by a qualified architectural historian approved by the City of Santee and shall include but not be limited to the following:

- An analysis of available literature and cultural databases, such as the South Coastal Information Center and historical societies, to identify known resources that have been documented
- A site survey, assessment and mapping of identified historical resources to determine the significance, boundaries and area of the resources, including eligibility to local, state, and national historic registers
- Mitigation measures to reduce significant impacts to identified historical resources
- A cultural survey report documenting the results of the historical survey and assessment

Archaeological Resources

CUL-2: **Contractor Training Program.** For future cannabis facilities proposed on undeveloped parcels within the City of Santee and developed parcels where resources have been identified, a qualified archaeologist approved by the City of Santee shall develop and implement a project-specific contractor training program to educate contractors about the sensitive cultural resources on and adjacent to the project site and the measures being implemented to avoid or minimize impacts to these resources.

CUL-3: **Cultural Resources Survey.** For future cannabis facilities proposed on undeveloped parcels within the City of Santee and developed parcels where resources have been identified, a site-specific cultural resources survey shall be conducted during the project design phase. The cultural resources survey shall be conducted by a qualified archaeologist approved by the City of Santee and shall include but not be limited to the following:

- An analysis of available literature and cultural databases, such as the South Coastal Information Center and Native American Heritage Commission, to identify known resources that have been documented
- A site survey, assessment, and mapping of identified cultural resources to determine the significance, boundaries, and area of the resources, including eligibility to local, state, and national historic registers
- Mitigation measures (e.g., data recovery, grading monitoring) to reduce significant impacts to identified cultural resources
- A cultural survey report documenting the results of the cultural survey and assessment

2.4.6 Energy

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☒	☐	☐

Environmental Setting

Total energy demand of cannabis operations depends heavily on the types of cultivation, manufacturing, or other activities and the types of equipment required. Indoor cultivation involves more equipment that tends to have much higher energy demands (e.g., high-intensity light fixtures, climate control systems). Specific energy uses in indoor grow operations include high-intensity lighting, dehumidification to remove water vapor and avoid mold formation, space heating or cooling during non-illuminated periods and drying processes, preheating of irrigation water, and ventilation and air conditioning to remove waste heat. Lighting is the greatest contributor to energy use (County of Sonoma 2021; County of Santa Barbara 2017). Comparatively, other commercial cannabis operations (storefront or non-storefront retail with optional delivery, testing, and distribution) tend to involve typical commercial equipment and processes that may require minor to moderate amounts of electricity similar to commercial and light industrial uses allowed under current project area zoning. The following analysis is based on the Energy Technical Memorandum prepared by Harris & Associates (Appendix C, Energy Technical Memorandum).

Impact Analysis

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. Anticipated development of new cannabis facilities through implementation of the Ordinance would result in an increase in energy demand compared to existing conditions. Construction of facilities associated with future cannabis cultivation projects would require the use of fossil fuels (primarily gasoline, diesel, and motor oil) for excavation, grading, and vehicle travel. The precise amount of construction-related energy consumption cannot be calculated in the absence of specific proposed projects. However, cannabis facilities are anticipated to be relatively small in size, and energy use during construction would be short term, temporary, and typical of other commercial and industrial facilities. Therefore, construction of

future cannabis facilities would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

The Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reductions (SSP) includes a Project Consistency Checklist (Checklist) that is intended to be a tool for development projects to demonstrate consistency with the SSP during operation (City of Santee 2020). The Checklist includes an evaluation of the project's design features for compliance with the SSP's greenhouse gas (GHG) emissions reduction measures, including energy efficiency and fuel use reductions. Future cannabis facilities would be required to comply with the SSP and California Building Code (CBC) regulations related to energy efficiency. Facilities would be subject to the Title 24 Building Energy Efficiency Standards. Additionally, the Ordinance would allow indoor cannabis cultivation as part of a permitted microbusiness in an industrial zone. Indoor cultivation would be restricted to 10,000 square feet or less of canopy growth and would be required to implement the state regulations for cannabis cultivation, which are in Title 3, Division 8, Chapter 1, of the California Code of Regulations, that are related to energy efficiency and conservation, requiring indoor cultivation facilities to report electricity usage and reduce their emissions if they are greater than their local utility's GHG emissions intensity. Therefore, compliance with existing regulations would reduce energy use from future cannabis facilities so that it would not be wasteful, inefficient, or unnecessary consumption. This impact would be less than significant.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant with Mitigation Incorporated. The SSP is a qualified GHG emissions reduction plan in accordance with CEQA Guidelines, Section 15183.5 (City of Santee 2020). Because the SSP is an adopted, qualified GHG reduction plan, it is the applicable plan for renewable energy or energy efficiency for the project.

The SSP includes the Checklist, which is intended to be a tool for development projects to demonstrate consistency with the SSP. The Checklist is part of the SSP implementation and monitoring process and supports the achievement of individual GHG reduction measures and the City's goals to conserve and reduce the consumption of resources, including fuel and energy. Projects that meet the requirements of the Checklist are considered consistent with the SSP and would be consistent with the City's energy efficiency and use reduction goals. The Checklist includes a two-step process to determine if a project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing Santee General Plan land use and zoning designations for the project area, which demonstrates consistency with the SSP GHG forecast. Step 2 consists of an evaluation of the project's design features for compliance with the SSP's GHG emissions reduction measures.

Regarding Step 1, new cannabis facilities would generally be consistent with planned commercial and industrial land uses for the project area identified in the Santee General Plan. Operational energy demand would occur from gasoline consumption from transportation (vehicle trips) and electricity and natural gas usage for cultivation, processing, and distribution but would generally be consistent with forecasted energy use. However, a cannabis facility with cultivation would have the potential to result in wasteful, inefficient, or unnecessary consumption of energy resources during operation if it would use significantly more energy than a commercial building of the same size that was planned for in the SSP GHG forecast.

However, because cannabis cultivation facilities tend to have a higher energy demand than typical commercial or industrial facilities, energy use from new cultivation facilities would likely result in higher energy demand than was forecasted for planned commercial or industrial uses in the SSP (County of Santa Barbara 2017). Because facility locations and operation specifications are unknown, future cannabis facilities with cultivation would have the potential to exceed the energy demand forecasted in the SSP. Therefore, impacts from new cultivation facilities would be potentially significant. The remaining allowable cannabis facilities (storefront or non-storefront retail with optional delivery, manufacturing, testing, and distribution and microbusinesses without cultivation) would have an energy demand typical of other planned commercial and industrial facilities and would not result in conflict with Step 1 of the SSP Checklist.

Step 2 includes various vehicle use and energy reduction measures that future cannabis facilities would be subject to. This includes requiring new commercial buildings to meet or exceed California Green Building Standards Tier 2 Voluntary Measures, such as obtaining green building ratings, including Leadership in Energy and Environmental Design (LEED), Build It Green, or Energy Star building certifications. Measures also include decreasing energy demand by reducing the heat island effect through tree planting and enhanced cool roof installation. Transportation measures include reducing VMT by requiring future projects to install sidewalks, bike lanes, and electric vehicle chargers and implement traffic flow improvements as applicable. Clean energy measures include installing at least 2 kilowatts per square foot of building area of photovoltaic solar systems on commercial buildings unless the installation is infeasible due to poor solar resources. Future cannabis facilities would be required to incorporate each of these applicable energy reduction measures and would not result in a conflict with Step 2 of the SSP Checklist.

Therefore, the project would not result in a conflict with the SSP, with the potential exception of cultivation facilities. Compliance with existing state regulations would reduce energy use from cultivation but may not reduce energy use to the level assumed for other commercial and light industrial uses in the SSP forecast. Additionally, the SSP demonstrates how the City achieves its fair share of emissions reductions to meet statewide emissions reduction targets. Through consistency with the SSP, the project would also be consistent with statewide reduction goals established in Assembly Bill (AB) 32 and Senate Bill (SB) 32. However, cultivation facilities

would have the potential to conflict with Step 1 of the SSP and result in a potentially significant impact. This impact would be potentially significant.

Mitigation Measures

Mitigation Measure ENE-1, Sustainable Santee Plan Forecast Consistency, would be implemented for future cannabis facilities with cultivation to demonstrate energy demand that is in line with the forecast assumptions of the SSP. This mitigation measure was also identified to mitigate potential GHG emissions impacts in Section 2.4.8, Greenhouse Gas Emissions. The following mitigation is required as part of the project to ensure that potential energy impacts are mitigated to a less than significant level.

ENE-1: Sustainable Santee Plan Forecast Consistency. Before the approval of a cannabis business permit to operate a cannabis facility with cultivation, the applicant shall demonstrate that energy demand from the proposed cannabis facility would be consistent with a typical commercial or industrial use (1.08 kilowatt-hours per year per square foot)[1] as forecasted in the Sustainable Santee Plan. Energy demand may be reduced through energy-efficient building design, use of energy-efficient equipment, or installation of solar panels to offset energy demand.

[1] Based on California Emissions Estimator Model (CalEEMod), version 20.4.0, defaults, typical energy demand is 1.08 kilowatt-hours per year per square foot (CAPCOA 2020).

2.4.7 Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause 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?	☐	☐	☒	☐
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 on- or off-site 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 direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Setting

The City is located in seismically active Southern California, a region that has experienced numerous earthquakes in the past. The Alquist-Priolo Special Studies Zones Act specifies that an area termed an "Earthquake Fault Zone" is to be delineated if surrounding faults are deemed sufficiently active or well-defined after a review of seismic records and geological studies. The City is not located within any Alquist-Priolo Special Studies Zones. 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.

According to the Santee General Plan Safety Element, no active, potentially active, or inactive faults occur within the City and the City does not lie within an Alquist-Priolo Earthquake Fault Hazard Zone (DOC 2015). While there are no active or potentially active faults are known to occur within or adjacent to the City, the City is similar to other areas in California in that it is subject to periodic seismic shaking due to earthquakes along remote or regional active faults. An active fault is defined by the California Geological Survey as a fault showing evidence for activity within the last 11,000 years.

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. The Rose Canyon Fault Zone is the dominant source of potential ground motion in the City (City of Santee 2003). Seismic parameters for the Rose Canyon Fault Zone include an estimated maximum earthquake magnitude of 6.9.

Impact Analysis

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, 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.

No Impact. As described above, no known or suspected faults are in the City, and the City does not lie within an Alquist-Priolo Earthquake Fault Hazard Zone. No impact would occur.

ii. Strong seismic ground shaking?

Less than Significant Impact. Ground shaking is responsible for the majority of damage from earthquakes and can damage or destroy buildings. The intensity of shaking depends on the type of fault, distance to the epicenter, magnitude of the earthquake, and subsurface geology. The closest fault systems could produce earthquakes that cause substantial ground motion that could result in serious injuries or deaths, as well as significant property damage, due to the seismic activity of the region as a whole. However, the Ordinance does not propose any specific development. Future cannabis facilities would be required to comply with the CBC, which would reduce exposure of people or structures to potential substantial adverse effects from seismic ground shaking. In addition, any proposed construction would require the adoption of appropriate engineering design in conformance with recommended geotechnical standards for construction. Therefore, impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction results when water-saturated, sandy, unstable soils are subject to intense shaking, such as that caused by an earthquake. These soils lose cohesiveness, causing unreinforced structures to fail. According to the Santee General Plan Safety Element, portions of the City are within a liquefaction hazard area. The Ordinance does not propose any specific development. Future cannabis facilities would be required to comply with all relevant federal and state regulations and CBC standards, including the requirement to conduct a preliminary soils investigation and potential subsequent preparation of a project-specific Geotechnical Investigation Report. Future projects would require the adoption of appropriate engineering design in conformance with the recommended geotechnical standards for construction. Therefore, impacts would be less than significant.

iv. Landslides?

Less than Significant Impact. The nearest earthquake fault within the vicinity of the City is the Rose Canyon Fault Zone, which is approximately 10 miles west of the City. An earthquake large enough to result in moderate ground shaking is possible. Seismic risks are significantly higher in areas closer to the region's major faults, and a moderate or major earthquake could result in potentially damaging ground shaking. Development on the hillside areas where steep slopes are present can exacerbate landslide hazards. Although the Ordinance does not propose any specific development, areas within the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones where cannabis facilities could be located are generally not within hillside areas in the City. Future cannabis facilities permitted under the Ordinance would be required to comply with the CBC and the recommendations of a preliminary soils investigation and potential subsequent project-specific Geotechnical Investigation Report, including engineered site preparation and adequate structural design, which would reduce potential adverse impacts from landslides. Therefore, impacts would be less than significant.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The Ordinance does not propose specific development at this time. Therefore, project components, such as the amount of grading, excavation, and vegetation removal, for future cannabis sites are unknown. If a project proposes to disturb more than 1 acre of soil, it is required by the state to prepare a Stormwater Pollution Prevention Plan (SWPPP), which would include best management practices (BMPs) for erosion and sedimentation control. BMP examples generally include an effective combination of erosion and sediment controls, which include barriers such as silt fences, hay bales, drain inlet protection, and gravel bags. Existing vegetation should be preserved as much as possible. Future cannabis facilities permitted under the Ordinance would be subject to these conditions as part of the construction permit process; therefore, impacts would be less than significant.

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

Less than Significant Impact. Development on hillside areas when steep slopes are present can increase rates of erosion and exacerbate landslide hazards, lateral spreading, liquefaction, or collapse, which may threaten structures. Portions of the City have areas where slopes exceed 15 percent. The development on slopes with this degree of inclination is difficult and should be avoided, if possible, to prevent property damage resulting from slope failure. The Ordinance does not propose any specific development. Future cannabis facilities would be required to adhere to the CBC, Santee Municipal Code, and other standards and regulations for building designs. The Santee General Plan Safety Element contains specific goals and policies that address hazards related to the development of unstable sites. Specifically, Policy 2 of the Safety Element requires future projects to demonstrate that potential geologic hazards can be avoided or mitigated through proper site planning, design, and construction.

Impacts resulting from unstable geologic units or soil would be reduced through compliance with the Santee General Plan, existing codes, and adherence with the recommendations of a preliminary soils investigation and subsequent project-specific Geotechnical Investigation Report, including engineered site preparation and adequate structural design. Any proposed construction would require the adoption of appropriate engineering design in conformance with the recommended geotechnical standards for construction. Therefore, impacts would be less than significant.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less than Significant Impact. Certain types of clay soils expand when they are saturated and shrink when dried. These are called expansive soils and can pose a threat to the integrity of structures built on them without proper engineering. Expansion and contraction of soils in response to changes in moisture content could lead to differential and cyclical movements that could cause damage or distress to structures and equipment. Thus, they are less suitable for development than non-expansive soils.

Future development of cannabis facilities permitted by the Ordinance could have the potential to be adversely impacted by expansive soils. According to the Santee General Plan Safety Element, areas within the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones where cannabis facilities could be located have a variable to moderate potential for expansive soils; however, the Ordinance does not propose any specific development. Future cannabis facilities permitted under the Ordinance would be required to adhere to the CBC, Santee Municipal Code, and other standards and regulations for building designs. Impacts resulting from expansive soils would be reduced through compliance with existing codes and adherence with the CBC recommendation to prepare a preliminary soils investigation and subsequent project-specific Geotechnical

Investigation Report, including engineered site preparation and adequate structural design. Any proposed construction would require the adoption of appropriate engineering design in conformance with the recommended geotechnical standards for construction. Therefore, impacts would be less than significant.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. Future cannabis facilities permitted under the Ordinance would connect to the existing City sewer system serviced by the Padre Dam Municipal Water District (PDMWD) and would not be supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant with Mitigation Incorporated. The Ordinance not propose any specific development. However, future cannabis facilities permitted under the Ordinance that involve grading and excavation could have the potential to (directly or indirectly) destroy a unique paleontological resource or site. According to the California Department of Conservation Geologic Map of California (2022), the southern area of the City where cannabis facilities would potentially be located is underlain with Mesozoic plutonic granite, quaternary deposits of alluvium, and tertiary sedimentary rocks of Eocene nonmarine sandstone. Areas underlain with alluvium and sandstone would have a moderate paleontological potential (County of San Diego 2009). Therefore, the potential exists for ground disturbance associated with development of future cannabis facilities to inadvertently discover paleontological resources in the area. This impact would be potentially significant.

Mitigation Measures

Mitigation Measure GEO-1 would be implemented to reduce potential impacts of inadvertent discoveries of paleontological resources by requiring a paleontological resources monitoring and mitigation plan in areas of moderate to high paleontological sensitivity to inform construction personnel of potential fossil discoveries and proper procedures for preserving these resources. Implementation of Mitigation Measure GEO-1 would reduce paleontological resources impacts to a less than significant level.

GEO-1: Paleontological Resources Monitoring and Mitigation Plan. Prior to construction of cannabis facilities that would result in ground disturbance in an area known to have moderate to high paleontological sensitivity, a qualified project paleontologist approved by the City of Santee shall be retained to oversee the mitigation program. A project paleontologist or paleontological monitor shall be present during all earthwork in formations with moderate to

high paleontological sensitivity. A Paleontological Resource Monitoring and Mitigation Plan shall be prepared and provide a description of the paleontological resources to inform construction personnel of the potential for fossil discoveries and of the types of fossils that may be encountered; detailed procedures for monitoring, fossil recovery, laboratory analysis, and museum curation; and notification procedures in the event of a fossil discovery by a paleontological monitor or other project personnel. In the event that paleontological resources are discovered during the construction phase of the project, a curation agreement from an accredited museum repository shall be obtained.

2.4.8 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 gases?	☐	☒	☐	☐

Environmental Setting

A GHG is any gas that absorbs infrared radiation and traps heat in the atmosphere. GHGs are produced from natural processes and human activities. The accumulation of GHGs in the atmosphere influences the long-term atmospheric temperatures and contributes to global climate change. Carbon dioxide (CO_2) accounts for the largest amount of GHG emissions, and collectively, CO_2, methane (CH_4), and nitrous oxide (N_2O) amount to 80 percent of the total radiative forcing from well-mixed GHGs (Appendix D, Greenhouse Gas Emissions Technical Memorandum). For each GHG, a global warming potential has been calculated to reflect how long emissions remain in the atmosphere and how strongly each GHG absorbs energy on a per-kilogram basis relative to CO_2. To simplify reporting and analysis, GHG emissions are typically reported in metric tons of carbon dioxide equivalent ($MTCO_2e$) units. Global warming potential is a metric that indicates the relative climate forcing of a kilogram of emissions when averaged over the period of interest.

Impact Analysis

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant with Mitigation Incorporated. The City adopted the SSP on January 8, 2020, which provides guidance for the reduction of GHG emissions in the City. The SSP provides policy direction and identifies actions the City and community will take to reduce GHG emissions consistent with state goals and targets. The SSP is a qualified GHG emissions reduction plan in accordance with the CEQA Guidelines, Section 15183.5 (City of Santee 2020). Pursuant to CEQA Guidelines, Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of a qualified plan. Projects that are consistent with a General Plan and implement applicable qualified plan GHG reduction measures may incorporate by reference the

plan's cumulative GHG analysis. Conversely, projects that are consistent with a General Plan but do not implement applicable plan GHG reduction measures, as well as General Plan Amendments and annexations that increase emissions beyond plan projections, require a project-level GHG analysis to determine if the project would result in significant GHG emissions. Because the SSP is an adopted, qualified GHG reduction plan, consistency with the SSP is the applicable threshold for the project.

Construction

Project construction emissions were estimated using CalEEMod, version 2020.4.0. The project does not propose any specific new development; however, it would allow cannabis facilities to be permitted in the City, consistent with the Ordinance. For this analysis, a realistic, worst-case scenario was developed to evaluate the project's impacts. A total of 20 facilities—retail (two locations total), microbusiness with retail (two locations total), microbusiness without retail (two locations total), manufacturing (four locations total), testing (four locations total), and distribution (six locations total)—were assumed to be permitted by the Ordinance. Development of cannabis facilities is anticipated to take place over 10–15 years (Appendix A). However, for the purposes of modeling a conservative construction scenario, it was assumed that project construction of all 20 facilities would take place within 12 months based on the CalEEMod default schedule assumption for the total amount of allowable development. Assumed construction phases include demolition, site preparation, grading, building construction, paving, and architectural coating. It is assumed that a total of 2.16 acres would be disturbed. Earthwork assumptions are unknown for future construction, and a model default is not available. Due to the developed nature of the project area, it is assumed that earthwork would generally be balanced on individual construction sites with minimal import and export required. Model defaults were used to estimate emissions associated with the construction schedule (with the exception of the architectural coating phase, which was extended to include several days per facility), construction equipment, daily vehicle trips, and haul trip distance. Detailed assumptions and modeling datasheets are provided in Appendix D. To reflect the contribution of construction emissions to the project's total GHG emissions, estimated annual construction emissions are provided in Table 7, Estimated Project-Related Greenhouse Gas Emissions, and amortized over the projected project lifetime. Specific guidance for construction emissions is not available from the SDAPCD; therefore, project lifetime is assumed to be 30 years, consistent with guidance from the South Coast Air Quality Management District (2008).

Operation

Operation of cannabis facilities permitted by the Ordinance would result in direct GHG emissions from vehicle trips and area and indirect emissions sources from electricity and natural gas consumption, water and wastewater transport, and solid waste generation. GHG emissions from electricity consumed on site by the project would be generated off site by fuel combustion at the electricity provider. GHG emissions from water and wastewater transport would also be indirect

emissions resulting from the energy required to transport water from its source and the energy required to treat wastewater and transport it to its treated discharge point.

Operational emissions for the project were estimated using CalEEMod. Vehicle trip data was obtained from the project's TIA (Appendix A). Trip lengths were adjusted to the regional estimate for specialty retail, manufacturing, science research and development, and industrial park uses as reported in the (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (SANDAG 2002). The project would generate approximately 4,427 average daily trips (ADT) (Appendix A). Energy use was adjusted in CalEEMod to more accurately reflect cannabis facility usage based on other approved cannabis projects (County of Sonoma 2021). Operational emissions from cannabis facilities permitted by the proposed Ordinance are shown in Table 7.

Table 7. Estimated Project-Related Greenhouse Gas Emissions

Emissions Source	Emissions ($MTCO_2e$)
Annual Construction Emissions	
Demolition	22
Site Preparation	3
Grading	5
Building Construction	291
Paving	8
Total	**329**
Amortized over 30 years	***11***
Annual Operation Emissions	
Area	<1
Electricity	1,191
Natural Gas	48
Mobile	1,534
Waste	57
Water	87
Total Annual Operation Emissions	**2,917**
Total Project Annual GHG Emissions	**2,928**

Source: CAPCOA 2020. Consistent with CalEEMod, version 2020.4.0 (output data provided in Appendix D).
Notes: GHG = greenhouse gas; MTCO2e = metric tons of carbon dioxide equivalent

As shown in Table 7, construction and operation of cannabis facilities allowed by the Ordinance would result in an increase in GHG emissions. However, development of similar types of commercial and industrial uses in the project area was generally assumed in the Santee General Plan. Per the Ordinance, cannabis facilities (including storefront or non-storefront retail with optional delivery, manufacturing, testing, and distribution and microbusinesses with optional cultivation) would be allowed in the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones consistent with the Santee General Plan land use designations. These cannabis uses are similar to other allowable uses in the City's commercial and industrial zones.

Future cannabis facilities would be subject to the City's administrative review process, which includes consistency with the SSP.

The SSP includes a Checklist that is intended to be a tool for development projects to demonstrate consistency with the SSP, which is a qualified GHG emissions reduction plan in accordance with CEQA Guidelines, Section 15183.5. The Checklist was developed as part of the SSP implementation and monitoring process and supports the achievement of individual GHG reduction measures and the City's overall GHG reduction goals. Additionally, the Checklist supports the City's sustainability goals and policies that encourage sustainable development and aim to conserve and reduce the consumption of resources, such as energy and water, among others. Projects that meet the Checklist requirements are considered consistent with the SSP and would have a less than significant contribution to cumulative GHG impacts (i.e., the project's incremental contribution to cumulative GHG effects is not cumulatively considerable), pursuant to CEQA Guidelines, Sections 15064(h)(3), 15130(d), and 15183(b). The Checklist includes a two-step process to determine if a project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing Santee General Plan land use and zoning designations for the project area, which demonstrates consistency with the SSP GHG forecast. Step 2 consists of an evaluation of the project's design features for compliance with the SSP's GHG emissions reduction measures.

Regarding Step 1, new cannabis facilities would generally be consistent with planned commercial and industrial land uses for the project area identified in the Santee General Plan. However, based on a review of analyses of similar projects, cannabis cultivation facilities tend to have a higher energy demand than typical commercial or industrial facilities (County of Santa Barbara 2017). Therefore, energy use from new cultivation facilities would likely result in higher energy demand than forecasted for planned development in the SSP. Because facility locations and operation specifications are unknown, future cannabis cultivation facilities would have the potential to exceed the energy demand forecasted in the SSP. Therefore, impacts from new cultivation facilities would be potentially significant. The remaining allowable cannabis facilities (storefront or non-storefront retail with optional delivery, manufacturing, testing, and distribution and microbusinesses without cultivation) would have an energy demand typical of other planned commercial and industrial facilities and would not result in a conflict with Step 1 of the SSP Checklist.

Step 2 includes various reduction measures applicable to future cannabis facilities. This includes requiring new commercial buildings to meet or exceed California Green Building Standards Tier 2 Voluntary Measures, such as obtaining green building ratings, including LEED, Build It Green, or Energy Star building certifications. Measures also include decreasing energy demand by reducing the heat island effect through tree planting and enhanced cool roof installation. Transportation measures include reducing VMT by requiring future projects to install sidewalks, bike lanes, and electric vehicle chargers and to implement traffic flow improvements as applicable.

Clean energy measures include installing at least 2 kilowatt per square foot of building area of photovoltaic solar systems on commercial buildings unless the installation is infeasible due to poor solar resources. Future cannabis facilities would demonstrate consistency with each of these applicable measures to demonstrate required compliance with Step 2 of the Checklist. The allowable cannabis facilities, including cultivation, would not include unusual features that would preclude implementation of applicable measures.

Therefore, because the project would be generally consistent with the growth assumptions in the Santee General Plan and would not increase the planned development capacity of the City and because the City has adopted a qualified GHG reduction plan with consistency requirements in place for future development under the project, implementation of the project would not result in significant GHG emissions, with the exception of cultivation facilities. Additionally, the SSP demonstrates how the City achieves its fair share of emissions reductions to meet statewide emissions reduction targets. Through consistency with the SSP, the project would also be consistent with statewide reduction goals established in AB 32 and SB 32. Cultivation facilities would have the potential to conflict with Step 1 of the SSP and result in a potentially significant impact.

Mitigation Measures

Mitigation Measure ENE-1 would be implemented for future cannabis facilities with cultivation to demonstrate energy demand that is in line with the forecast assumptions of the SSP. This mitigation measure was also identified to mitigate potential energy impacts. Refer to Section 2.4.6, Energy. Implementation of Mitigation Measure ENE-1 would reduce energy impacts to a less than significant level.

2.4.9 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?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would 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, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Environmental Setting

The California Health and Safety Code defines a hazardous material as "any material that because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Thus, the term "hazardous material" is a broad term for all substances that may be hazardous, specifically including hazardous substances and hazardous waste. Substances that are flammable, corrosive, reactive, oxidizers, radioactive, combustible, or toxic are considered hazardous.

Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact. The project does not propose any specific development; however, it would allow cannabis facilities to be permitted in the City, consistent with the Ordinance. Construction activities associated with future cannabis facilities could involve the use of chemical substances, such as solvents, paints, fuel for equipment, and other potentially hazardous materials. These materials are common to typical construction activities and do not pose a significant hazard to the public or the environment. New facilities may contain hazardous materials, such as paint, herbicides/pesticides, diesel fuel, and cleaning products, which have the potential to spill. Future development of the sites within the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones would be consistent with the type and the intensity of surrounding land uses. Long-term operation of future land uses would not involve large quantities of hazardous materials. Future cannabis manufacturing facilities may use non-volatile solvents, including CO_2, ethanol, and nonhydrocarbon-based, or other solvents, such as water, vegetable glycerin, vegetable oil, animal fat, and glycerin, to create or refine extracts. However, solvents or gases would be contained within a closed loop system per the Ordinance. In addition, the Ordinance would include safety measures to protect the community against human-generated hazards. The Ordinance, Section 7.04.320, Security Measures, requires that cannabis facilities have a storage and transportation plan, which describes in detail the procedures for safely and securely storing and transporting all cannabis, cannabis products, any hazardous materials that may be used by the business, and any currency.

Adherence to regulations, including federal and local regulations, and standard protocols during the storage, transportation, disposal, and usage of any hazardous materials would minimize the hazard to the public or the environment. Potential hazard-related impacts are location specific and cannot be assessed in a meaningful way until the location of the project site is known. A project would be subject to adopted development guidelines/standards when a development proposal is considered, and any impacts identified with the development project would be addressed through mitigation measures specific to the impact. Site-specific CEQA review and compliance with the standards/regulations at the time of future development would result in less than significant impacts.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. Human exposure to hazardous substances might occur through accidental release. Incidents that result in an accidental release of hazardous substances into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. If not cleaned up immediately and completely, hazardous

substances can migrate into the soil or enter a local stream or channel causing contamination of soil and water. Human exposure to contaminated soil, soil gas, or water can have potential health effects depending on a variety of factors, including the nature of the contaminant and the degree of exposure.

As previously mentioned, the Ordinance does not propose any specific development. However, construction of new cannabis facilities permitted by the Ordinance may result in accidental releases, such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials that would be used during new construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, state, and federal law, including the California Hazardous Waste Control Law, California Division of Occupational Safety and Health requirements, federal Resources Conservation and Recovery Act, and federal Emergency Planning and Community Right-to-Know Act. Compliance with existing laws and regulations would ensure impacts would be less than significant.

According to the Ordinance, Section 7.04.410(C–K), operating requirements for cannabis manufacturing would include the following:

- Cannabis manufacturing facilities may use heat, screens, presses, steam distillation, ice water, ethanol, and other methods without employing solvents or gases to create their products.
- Cannabis manufacturing facilities may use non-volatile solvents, including carbon dioxide, ethanol, and nonhydrocarbon-based, or other solvents, such as water, vegetable glycerin, vegetable oil, animal fat, and glycerin, to create or refine extracts. Ethanol should be removed from the extract in a manner to recapture the solvent and ensure that it is not vented into the atmosphere.
- Closed loop systems for compressed gas extraction systems must be commercially manufactured and bear a permanently affixed and visible serial number.
- Certification from an engineer licensed by the State of California, or by a certified industrial hygienist, must be provided to the City for a professional grade closed loop system used by any cannabis manufacturing manufacturer to certify that the system was commercially manufactured, is safe for its intended use, and was built to codes of recognized and generally accepted good engineering practice.
- Any person using solvents or gases in a closed looped system to create cannabis extracts must be fully trained on how to use the system, have direct access to applicable material safety data sheets to handle, and store the solvents and gases safely.

Long-term operation of future land uses would not involve large quantities of hazardous materials. Adherence to regulations and standard protocols during the storage and use of any hazardous materials, as discussed above, would minimize and avoid the potential for significant upset and accident condition impacts. In addition, the Santee Municipal Code establishes a hazardous materials release response program to initiate quick response to accidental releases (e.g., discharge, spills). Potential hazard-related impacts are location specific and cannot be assessed in a meaningful way until the location of a project site is known. When a development proposal is considered, the project would be subject to adopted development guidelines/standards, and any impacts identified with the development project would be addressed through mitigation measures specific to the impact. Therefore, impacts related to accidental releases would be less than significant.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. Per state requirements, cannabis facilities are not allowed to be located within 600 feet of schools. The City is proposing a 900-foot buffer that would prevent cannabis facilities from being developed near schools. One-quarter mile is equal to 1,320 feet. Some potential locations of cannabis facilities are located within one-quarter mile (1,320 feet) of the following schools: PRIDE Academy at Prospect Avenue, Chet F. Harritt Elementary School, and Rio Seco Elementary School.

Development permitted by the Ordinance would not use or store large quantities of hazardous waste. New developments would be subject to planning, zoning, and procedures involved in site plan approvals, and land use planning would typically separate uses that would place a school near a development where hazardous materials may be used. Through the City's environmental review process, the development of future cannabis facilities would be evaluated for the potential release of hazardous materials into the environment. Therefore, impacts related to hazardous materials near a school would be less than significant.

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

Less than Significant Impact. The Ordinance does not propose any specific development. However, future cannabis facilities permitted under the Ordinance could locate new development on a hazardous materials site. According to GeoTracker (2022), five active cleanup sites are within the City. If a future cannabis facility is potentially located on one of these sites, projects may be required to prepare a Phase I Environmental Site Assessment, which would include a database search for existing hazardous materials sites, identify potential violations under federal and/or applicable state and local environmental laws, and provide recommendations for correcting deficiencies or problems. Where appropriate, mitigation measures would be required for specific projects to reduce potential hazards to the public. According to the California Department of Toxic

Substances Control Hazardous Waste and Substances List (Cortese List), currently, no hazardous materials sites pursuant to California Government Code, Section 6592.5, are within the identified potential sites for cannabis facilities. Therefore, impacts related to hazardous waste sites would be less than significant.

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

Less than Significant Impact. The nearest airport to the City is Gillespie Field, located directly south of the southern boundary in the City of El Cajon. Marine Corps Air Station (MCAS) Miramar is also located directly west of the southern boundary of the City. MCAS Miramar is not a public airport and is restricted to military use providing facilities and services to various Marine Corps and Navy operating units. The entire project area falls outside any Overflight Zones and are not subject to overflight-related disclosure or notification requirements (SDCRAA 2011).

Gillespie Field is a 757-acre publicly owned facility that is owned and operated by the County of San Diego, Department of Public Works. Gillespie Field is a general aviation airport used primarily for business and recreational purposes, which does not function as a major transportation mode for residents of Santee. The majority of the operations at Gillespie Field are categorized as General Aviation. The smallest portions of the annual operations are categorized as Air Taxi and Military. No regularly scheduled commercial flights occur at Gillespie Field.

To minimize the risk and to reduce the severity of aviation accident, six safety zones have been established for Gillespie Field based on the California Airport Land Use Planning Handbook guidelines (SDCRAA 2011). To ensure that community land uses are outside areas where aviation accidents are most likely to occur, three Gillespie Field safety zones are identified with policies formulated to address the specific safety concerns of those areas. Future cannabis facilities located within the six safety zones would be required to comply with the Gillespie Field safety guidelines to ensure development is in compliance with safety hazard zone guidelines. Through the City's environmental review process, future cannabis projects would be evaluated for compatibility with the existing safety zones to ensure they would not result in a safety hazard or excessive noise for people residing or working in the project area. For a discussion of noise hazards, refer to Section 2.4.13(c). Therefore, impacts would be less than significant.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The City has prepared its own Emergency Operations Plan (2020) in compliance with the State Office of Emergency Services and the Santee Municipal Code, which identifies responses and actions depending on the nature and the scope of the disaster.

Construction of future cannabis facilities would have the potential to interfere with emergency plans and procedures if authorities are not properly notified or multiple projects are constructed during the same time and multiple roadways used for emergency routes are concurrently blocked. Because future cannabis land uses would be consistent with the current Santee General Plan land use designations, no changes in the City's existing circulation network would be proposed or required under the Ordinance. However, future development projects would be subject to site-specific review and would be subject to City regulations regarding street design, site access, and internal emergency access. In addition, Ordinance, Section 7.04.320, Security Measures, includes a measures that requires cannabis facility emergency access and emergency evacuation plans to be in compliance with state and local fire safety standards. Therefore, impacts associated with the physical interference of an adopted emergency response or evacuation plan would be less than significant.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than Significant Impact. According to California Department of Forestry and Fire Protection's (CAL FIRE's) Fire Hazard Severity Zone Map Viewer (CAL FIRE 2021), the City is designated as a moderate to high, unzoned Local Responsibility Area. Several Very High Fire Hazard Severity Zones (VHFHSZ) are in the City, notably in the northern/northwestern and the southern/southwestern portions of the City. Areas where cannabis facilities may be located in the southwestern region of the City are adjacent to the VHFHSZ. Development of future projects in a Moderate to High Fire Hazard Severity Zone could result in a potentially significant impact from the exposure of 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 residents are intermixed with wildlands. Through the City's environmental review process, the development of future cannabis facilities would be required to abide by the CBC, which contains measures to reduce fire hazards in structures, including the use of materials, fire separation walls, building separation, and fire sprinklers. In addition, the City has adopted amendments to the California Fire Code (Santee Municipal Code, Section 11.18.020), which requires a Fire Protection Plan, approved by the Fire Chief, to be established for all new development within declared Fire Hazard Severity Zones and/or Wildland-Urban Interface. Compliance with existing regulations and Santee General Plan policies would ensure that impacts are less than significant.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.10 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 or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Environmental Setting

The City is in the San Diego River Watershed, which is located in central San Diego County. The watershed is bordered to the north by the Peñasquitos and San Dieguito River Watersheds and to the south by the Pueblo San Diego and Sweetwater River Watersheds. According to the San Diego River Watershed Management Area Water Quality Improvement Plan (2016), the San Diego River originates in the Cuyamaca Mountains near Santa Ysabel, over 6,000 feet above sea level, along the western border of the Anza Borrego Desert Park. The San Diego River extends over 52 miles across central San Diego County, forming a watershed with an area of approximately 277,543 acres, or 434 square miles. The San Diego River ultimately discharges to the Pacific Ocean at Dog Beach in Ocean Beach, a community within the City of San Diego. The San Diego River Watershed is the fourth largest of the 10 watershed management areas in the San Diego region.

The San Diego River Watershed (Hydrological Unit 907) consists of four hydrologic areas: Lower San Diego (907.1), San Vicente (907.2), El Capitan (907.3), and Boulder Creek (907.4). The City is located in the Lower San Diego Hydrologic Area (907.1). The Lower San Diego Hydrologic Area includes portions of the Cities of San Diego, El Cajon, La Mesa, Poway, and Santee and several unincorporated jurisdictions.

In 1994, the San Diego RWQCB adopted a Water Quality Control Plan, or Basin Plan, which recognizes and reflects regional differences in existing water quality, the beneficial uses of the region's ground surface waters, and local water quality problems. The San Diego Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy; (3) describes implementation programs to protect the designated beneficial uses of all waters in the region; and (4) describes surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan.

The City is working cooperatively with other jurisdictions on a plan for the overall watershed. In addition, the City completed a Jurisdictional Urban Runoff Management Plan in 2002 to address local water quality issues. The local plan addresses water quality issues in the primary water basins in the City. The goal of the plan is to reduce or eliminate the contaminants that are transported in stormwater and ultimately delivered to the rivers and creeks in the City and downstream (City of Santee 2003). The program focuses on reducing pollution in the three major areas of development: planning, construction, and existing development. Other components of the program include storm drain monitoring to detect pollution, public reporting of illegal dumping, and providing education information to a variety of audiences describing water quality issues.

Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. Clearing, grading, excavation, and construction activities associated with new cannabis facilities permitted by the Ordinance may result in short-term impacts to water quality due to sheet erosion of exposed soils and subsequent deposition of particulates in local drainages. Grading activities lead to exposed areas of loose soil and sediment stockpiles that are susceptible to uncontrolled sheet flow. Future development may result in long-term impacts to the quality of stormwater and urban runoff, subsequently impacting downstream water quality, and could potentially create new sources for runoff contamination.

Future cannabis facilities would be required to comply with all applicable water quality standards. Any future development within the City would be subject to the federal Clean Water Act, which is established through compliance with the requirements of the National Pollutant Discharge

Elimination System (NPDES) Construction General Permit, and the Porter-Cologne Water Quality Control Act. In the City, the San Diego RWQCB issues and approves NPDES permits per the federal Clean Water Act. NPDES Construction General Permits require projects to develop and implement a SWPPP, which must list the BMPs the applicant will employ to "prevent all construction pollutants from contacting stormwater," and BMPs must be developed "with the intent of keeping all products of erosion from moving off site into receiving water channels." The SWPPP must also include a visual monitoring program and a chemical monitoring program for non-visible pollutants.

The NPDES also requires local governments to obtain an NPDES Permit for stormwater-induced water pollutants in its jurisdiction. The San Diego RWQCB regulates discharges from Phase I municipal separate storm sewer systems (MS4s) in the San Diego region under the Regional MS4 Permit. The Regional MS4 Permit covers 39 municipal, county government, and special district entities (referred to jointly as "copermittees") in the County of San Diego, southern County of Orange, and southwestern County of Riverside who own and operate large MS4s that discharge stormwater (wet weather) runoff and non-stormwater (dry weather) runoff to surface waters throughout the San Diego region. The Regional MS4 Permit, Order No. R9-2013-0001, was adopted on May 8, 2013, and initially covered the County of San Diego copermittees. Order No. R9-2015-0001 was adopted on February 11, 2015, amending the Regional MS4 Permit to extend coverage to the County of Orange copermittees. Finally, Order No. R9-2015-0100 was adopted on November 18, 2015, amending the Regional MS4 Permit to extend coverage to the County of Riverside copermittees. The City is 1 of 18 municipalities in the County of San Diego that is a copermittee. The permit establishes a region-wide Stormwater Management Plan to control discharges of sanitary wastewater, septic tank effluent, car wash wastewaters, improper oil disposal, radiator flushing, laundry wastewater, spills from roadway accidents, and improper disposal of toxic materials. Pollutant control measures in the Stormwater Management Plan include a specific focus on failing septic tanks, industrial/business connections, recreational sewage, and illegal dumping. Developers are required to implement appropriate BMPs on construction sites to control erosion and sediment.

In addition, future cannabis facilities would be required to comply with the Santee Municipal Code, which contains requirements for water conservation and recycling measures. The Santee General Plan Conservation Element Policy 3.2 encourages the development and utilization of innovative water conservation measures in all proposed developments in conjunction with the San Diego County Urban Water Management Plan (2020) that incorporates BMPs, which reinforces the NPDES regulatory requirements. Compliance with federal, state, and City regulations would ensure that impacts are less than significant.

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

Less than Significant Impact. Water service in the City is currently provided by the PDMWD. The City imports its water from the State Water Project and the Colorado River Aqueduct.

Future facilities would be required to incorporate features that would reduce impervious area, as feasible, and promote water infiltration. Treatment control and hydromodification management facilities would promote retention and infiltration of stormwater. Redevelopment of developed sites requires compliance with water quality standards intended to reduce runoff, increase infiltration, and improve water quality. In addition, the Santee General Plan Conservation Element includes an objective that protects groundwater resources. Specifically, Objective 10.0 encourages the preservation of significant natural resources, such as groundwater, as part of a Citywide open space system. In addition, the Santee General Plan Land Use Element includes an objective to provide and maintain the highest LOS possible for all community public services and facilities (Objective 3.0). Specifically, Policy 3.2 encourages the development and use of recycled water for appropriate land uses to encourage the conservation of, and reduce demand for, potable water. Compliance with federal, state, and City regulations would ensure that impacts are less than significant.

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

i. Result in substantial erosion or siltation on- or off-site?

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

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

iv. Impede or redirect flood flows?

Less than Significant Impact. Future cannabis facilities permitted by the Ordinance could result in the alteration of drainage patterns, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, during and after construction activities. Stormwater drainage and system modifications and improvements associated with future development would be required to comply with all applicable regulations, including discharge rate controls, and be designed for a 100-year storm event. However, some of the identified sites within the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones for cannabis facilities are already developed and future development in these areas would not alter drainage.

In addition, cannabis facilities would be required to adhere to all federal, state, and local requirements for avoiding construction and operational impacts that could substantially alter the existing drainage pattern or alter the course of a stream or river, including NPDES permitting and the Regional MS4 Permit, compliance with the Santee Municipal Code, and Santee General Plan Conservation Element and Land Use Element objectives and policies for implementing Water Quality Plans and incorporating BMPs. Considering these requirements, future cannabis facilities permitted by the Ordinance would not substantially alter the existing drainage pattern of the site or area. This includes no alteration of the course of a stream or river in a manner that would result in substantial erosion or siltation on or off site, substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site, create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, provide substantial additional sources of polluted runoff, or impede or redirect flood flows. Therefore, impacts would be less than significant.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less than Significant Impact. A tsunami is a very large ocean wave caused by an underwater earthquake or volcanic eruption. Tsunamis can cause flooding to coastlines and inland areas less than 50 feet above sea level and within 1 mile of the shoreline. The City is located approximately 18 miles (29 kilometers) inland from the Pacific Ocean and would not be susceptible to inundation or flooding due to a tsunami.

Seiches are defined as wave-like oscillatory movements in enclosed or semi-enclosed bodies of water, such as lakes or reservoirs, and are most typically associated with seismic activity. The City is not subject to inundation by seiche. The City's lakes, including Santee Lakes Recreation Preserve, are located in areas that would make it difficult for the City to be inundated due to the topography of the area. The Santee Municipal Code contains provisions to protect against the overflow of floodwaters in Title 11, Chapter 36, Flood Damage Prevention. Further, the City is primarily located in Federal Emergency Management Agency Flood Zone X, which is outside the 100- and 500-year flood hazard areas. Therefore, implementation of the Ordinance would not release pollutants due to inundation caused by a flood hazard, tsunami, or seiche.

Future development would be subject to the NPDES MS4 Permit, which requires the development and implementation of a SWPPP, which specifies BMPs that reduce or prevent construction pollutants from leaving the site in stormwater runoff and minimize erosion caused by flooding associated with the construction project. The City of Santee Flood Damage Prevention Ordinance contains provisions to safeguard the public and structures from flood hazards, including restrictions on uses that are dangerous to health, safety, and property; controls on alterations of natural floodplains, stream channels, and natural flood barriers; and prohibition of development within 100- year flood zone areas as identified by Federal Emergency Management Agency Flood

Insurance Rate Maps and on City land use and zoning maps. Santee Municipal Code Title 11, Chapter 36, Flood Damage Prevention, contains methods of preventing and reducing flood hazards. Within the Santee General Plan Conservation Element, objectives and policies are provided to protect the community from flooding hazards. The objectives and policies reinforce the Santee Municipal Code by ensuring that all development proposals are located outside designated floodways and all development in the 100-year floodplain is consistent with the City's Flood Damage Prevention Ordinance. With implementation of the Santee General Plan objectives and policies, Santee Municipal Code, and NPDES MS4 Permit, impacts would be less than significant.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. As discussed previously, the City is under the jurisdiction of the San Diego RWQCB. Water quality standards and control measures for surface and ground waters of the San Diego region are contained in the Water Quality Control Plan for the San Diego Basin (Basin Plan) for the San Diego region. The plan designates beneficial uses for water bodies and establishes water quality objectives, waste discharge prohibitions, and other implementation measures to protect those beneficial uses.

Future cannabis facilities would comply with the requirements under the NPDES Permit program, the Phase I MS4 General Permit in the San Diego River Watershed, the San Diego RWQCB-approved Basin Plan, and implementation of associated BMPs and other requirements of SWPPP, as well as a City-approved Stormwater Quality Management Plan, which would ensure stormwater discharges associated with construction and use of future development projects comply with regulatory requirements in the City and would not conflict with a Water Quality Control Plan or Groundwater Management Plan. Compliance with state and local requirements for avoiding and minimizing construction and operational impacts to prevent conflicts with or obstruction of implementation of a Water Quality Control Plan or sustainable groundwater management plan would ensure that impacts are less than significant.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.11 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. 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?	☐	☐	☒	☐

Environmental Setting

Physical development in the City is currently governed by the existing Santee General Plan adopted in August 2003. The Santee General Plan disaggregates the City and its sphere of influence according to land use designations, with residential being the predominant existing land use.

Impact Analysis

a. Would the project physically divide an established community?

Less than Significant Impact. Projects that divide an established community can involve large scale linear infrastructure, such as freeways, highways, and railroads that bisect an established community or create barriers to movement within that community. "Locally undesirable land uses," such as prisons or landfills, sited within economically depressed areas can also divide an established community. Future cannabis facilities proposed as a result of the Ordinance would be located in existing commercial and industrial areas (General Commercial [GC], Light Industrial [IL], and General Industrial [IG] zones) that allow similar uses; therefore, future cannabis facilities would not physically divide the community. Impacts would be less than significant.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. The Ordinance would provide the City with the authority to regulate the commercial cultivation, processing, manufacturing, testing, sale, delivery, and distribution of cannabis and cannabis products in a responsible manner to protect the health, safety, and welfare of the residents of the City and to enforce rules and regulations consistent with state law and in a fair and equitable manner.

Future cannabis facilities permitted under the Ordinance would be subject to the Santee General Plan, updates to the General Plan (once approved), and the Santee Municipal Code, Title 13, Zoning. These documents and ordinances include standards to protect aesthetic quality and scenic viewsheds, biological resources, cultural resources, and public health and safety. Table 8, Santee General Plan

and Zone Matrix Consistency, demonstrates the proposed cannabis land uses consistency with the existing Santee General Plan land use designations and Santee Municipal Code Title 13 zones.

Table 8. Santee General Plan and Zone Matrix Consistency

Santee General Plan Consistency – Cannabis Land Uses						
Land Use Designations	**Distribution**	**Manufacturing**	**Micro-Businesses with Storefront Retail, No Cultivation**	**Retail Businesses (Storefront)**	**Retail Businesses (Non-Storefront Delivery)**	**Testing Labs**
1. General Commercial (GC)	—	—	Y	Y	—	—
2. General Commercial Overlay (GC/IL)	Y	Y	Y	Y	Y	Y
3. Light Industrial (IL)	Y	Y	Y	Y	Y	Y
4. Light Industrial Overlay (IL/GC)	Y	Y	Y	Y	Y	Y
5. General Industrial (IG)	Y	Y	Y	Y	Y	Y
Zone Matrix Consistency – Cannabis Land Uses						
Land Use Classifications	**Distribution, Manufacturing**	**Micro-Businesses with Storefront Retail, No Cultivation**	**Micro-Businesses with Cultivation**	**Retail Businesses (Storefront)**	**Retail Businesses (Non-Storefront Delivery)**	**Testing Labs**
6. General Commercial (GC)	—	P	—	P	—	—
7. Light Industrial (IL)	P	P	P	P	P	P
8. General Industrial (IG)	P	P	P	P	P	P

As shown in Table 8, the new cannabis land uses would be consistent with the existing commercial and industrial General Plan land use designations as well as the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones per the Santee Municipal Code, Title 13, and therefore, would not require a General Plan Amendment or conflict with the Santee General Plan or Santee Municipal Code, Title 13.

Because residences are not considered a sensitive use per the Ordinance, new cannabis facilities may be within 900 feet of residences, such as along Prospect Street where residential areas are adjacent to existing light industrial developments. This would only occur in a few locations where General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones are adjacent to residential zones or non-conforming residential uses. However, due to required setbacks and because new businesses would generally be in areas currently developed with commercial and industrial land uses, land use conflicts associated with nearby residences would be unlikely to occur.

As discussed under Section 2.4.4(f), the Draft Santee MSCP Subarea Plan has not been approved, and the City does not have an adopted Habitat Conservation Plan. Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan.

Therefore, the project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.12 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Setting

The Surface Mining and Reclamation Act of 1975 requires the classification of land into mineral resource zones (MRZ), according to known or inferred mineral resource potential. The process is based solely on geology, without regard to existing land use or land ownership. According to the Santee General Plan Conservation Element, Santee has land designated in two categories: MRZ-2 and MRZ-3. MRZ-2 designates "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," while MRZ-3 includes "areas containing mineral deposits whose significance cannot be evaluated from available data." According to the Santee General Plan Land Use Element, areas within the City that contain valuable mineral resources are located along the floodplain of the San Diego River and on the surrounding hills underlain by granite. The remainder of the City is designated MRZ-3. Despite the potential for mineral recovery from any MRZ area, consideration of economics, land use compatibility and environmental protection, including regional habitat protection efforts, must be considered when deciding on the appropriateness of mining in a particular area.

Impact Analysis

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?

No Impact. The locations where future cannabis facilities may be located are in the MRZ-2 and MRZ-3. Future cannabis facilities permitted under the Ordinance would be consistent with the Santee General Plan land use designations and would not substantially limit the future availability of known mineral resources. In addition, locations where future cannabis facilities may be located in the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones are not planned for future mining operations or zoned for such uses. Therefore, no impact would occur.

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?

No Impact. As described in Section 2.4.12(a), locations where future cannabis facilities may be located (General Commercial [GC], Light Industrial [IL], and General Industrial [IG] zones) are not zoned for mining operations, and no existing or planned mining operations occur on site or in the immediate vicinity of these areas. Therefore, the project would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.13 Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?	☐	☒	☐	☐

Environmental Setting

The California Department of Transportation defines "noise" as sound that is loud, unpleasant, unexpected, or undesired. Further, for the purposes of noise analysis, noise only exists if a source, path, and receiver are present. Sound pressure waves must be produced by a source and transmitted through a medium, such as air. The sound must be perceived by, registered by, or affect a receptor, such as an ear or noise monitoring device (Appendix E, Noise Technical Report). A receptor's response to a given noise may vary depending on the sound level, duration of exposure, character of the noise sources, time of day during which the noise is experienced, and activity affected by the noise. In consideration of these factors, different measures of noise exposure have been developed to quantify the extent of the effects from a variety of noise levels. The City uses the day-night noise level (Ldn), which is a 24-hour equivalent energy level which provides an average acoustical or sound energy content of noise, measured during a prescribed period.

Traffic noise, especially along freeway corridors and major roadways, is the primary source of noise in the City, including potential cannabis facility locations (City of Santee 2003). Aircraft flyovers from Gillespie Field and MCAS Miramar are also a source of noise throughout the City. Land surrounding the project area is generally developed with existing commercial and industrial development. Typical commercial and industrial noise sources include parking lot noise, commercial truck deliveries at loading docks, and equipment noise, such as heating, ventilation, and air conditioning systems (HVAC).

Impact Analysis

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

Less than Significant Impact. Potential project-related noise impacts from construction activities, operational sources, and transportation sources, are discussed below.

Construction

Temporary Noise Increase

The Ordinance does not specifically propose new development. However, future construction of new buildings or redevelopment of existing structures to accommodate new cannabis facilities would generate noise that could expose nearby receptors to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction phase, distance between the noise source and receiver, and intervening structures. Temporary construction activity noise would be considered significant if it violates the limits established in Section 5.04.090 of the City's Noise Ordinance. The City's Noise Ordinance prohibits operation of any construction equipment outside the hours of 7:00 a.m. through 7:00 p.m., Monday through Saturday, excluding legal holidays, without approval from the City's Director of Development Services. In addition, construction equipment with the potential to exceed 85 A-weighted decibel (dBA) at the construction site shall not be operated at the same location for more than 10 consecutive workdays without notification to properties within 300 feet of the site.

Sound levels from typical construction equipment are provided in Table 9, Typical Construction Equipment Noise Levels. As shown in Table 9, noise levels range from 76 dBA to 88 dBA equivalent energy level (Leq) at 50 feet from the source (FTA 2018). Noise from construction equipment generally exhibits point source acoustical characteristics. Strictly speaking, a point source sound decays at a rate of 6 dBA per doubling of distance from the source. The rule applies to the propagation of sound waves with no ground interaction.

Table 9. Typical Construction Equipment Noise Levels

Equipment	Typical Noise Level 50 Feet from Source (dBA)
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Crane	83
Dozer	85
Generator	82
Grader	85
Jack Hammer	88
Loader	80
Paver	85
Roller	85
Saw	76
Truck	84

Source: FTA 2018.
Notes: dBA = A-weighted decibel

The project does not propose any specific new development. It is currently unknown what new or improved buildings would be constructed to accommodate cannabis uses or the exact locations of these uses in the project area. Construction of cannabis facilities consistent with the proposed Ordinance is anticipated to occur over multiple years. During this time, construction impacts would be expected to occur temporarily throughout the project area. It is anticipated that standard equipment, such as dozers, loaders, graders, backhoes, scrapers, and miscellaneous trucks, would be required for most construction days. Construction would take place during the allowable City Noise Ordinance hours of 7:00 a.m. to 7:00 p.m. Standard construction operation would have the potential to exceed 85 dBA at the construction site for more than 10 consecutive workdays and would require notification to all property owners and residents within 300 feet of the site in accordance with the City's Noise Ordinance. Future construction would be required to comply with the City's Noise Ordinance construction noise limitations. Therefore, the impact would be less than significant.

Operation

Operational Noise Generated by the Proposed Ordinance

The Ordinance not propose any specific development. However, future cannabis facilities permitted under the Ordinance would include a range of commercial and industrial activities that have the potential to generate noise that may affect existing noise-sensitive receptors. Typical noise produced from commercial and industrial development includes HVAC and other stationary

equipment, truck deliveries, parking lots, and solid waste collection. These noise sources are addressed below. The proposed Ordinance includes the following standards to minimize exposure of noise-sensitive land uses (NSLUs) to noise from future cannabis facilities:

- **Section 7.04.290:** All cannabis business permittees must be no closer than 900 feet from any zoned parcel in the City designated by the City and state law as a sensitive use, including schools, daycare centers, churches, youth activity centers, and parks.
- **Section 7.04.340:** Cannabis shall not be consumed by any person on the premises of any cannabis facilities. No person shall cause or permit the sale, dispensing, or consumption of alcoholic beverages or tobacco on or about the premises of the cannabis facilities. Loitering is prohibited outside any facility and surrounding area.
- **Section 7.04.360:** Operating hours of the storefront retailer license shall be limited to the hours of 9:00 a.m. through 9:00 p.m., 7 days per week.
- **Section 7.04.370:** Operating hours of the non-storefront retailer license or out-of-town retail delivery services shall be limited to the hours of 9:00 a.m. through 9:00 p.m., 7 days per week.

The specifications and locations of HVAC systems that would be installed at new cannabis facilities are unknown at this time. For this analysis, it is assumed that the HVAC systems of a light industrial project would be typical of allowed uses. Major mechanical HVAC equipment on the ground or rooftops of new buildings is assumed to generate noise levels that average 69–73 dBA Ldn at a distance of 50 feet when running continuously (Appendix E). As such, HVAC units could have the potential to generate noise that may exceed the noise compatibility standard of 65 dBA Ldn for sensitive receptors up to 125 feet from the unit. Cannabis cultivation facilities may additionally require enhanced ventilation systems to reduce odors at surrounding receptors and dehumidification systems. Similar to HVAC systems, the specifications of future systems are unknown. However, based on review of similar facilities, odor control systems would generate noise similar to typical HVAC systems and dehumidification equipment, and the noise associated with this equipment is expected to only generate a low hum from fans or blowers (County of Santa Barbara 2017; County of Sonoma 2021).

New businesses would not be licensed within 900 feet of most uses considered noise sensitive. New cannabis facilities may be within 900 feet of residences, such as along Prospect Street where residential areas are adjacent to existing light industrial developments. This would only occur in a few locations where General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones are adjacent to residential zones or non-conforming residential uses. However, due to required setbacks and because new businesses would generally be in areas currently developed with commercial and industrial land uses, it is unlikely that new stationary equipment systems would be within 125 feet of existing residences. Additionally, similar to existing requirements for allowable commercial and industrial development, new cannabis facilities would be required to

demonstrate consistency with existing development standards, including the Santee General Plan and City's Noise Ordinance noise limits, for all new stationary equipment.

Similar to HVAC units, the types, specifications, and locations of new stationary equipment for manufacturing, testing, and cultivation uses are currently unknown. However, no outdoor cultivation would be allowed, and equipment would generally be in buildings that would provide noise attenuation to outside receptors. Buildings would be separated from most sensitive receptors by at least 900 feet. In addition to complying with the Santee General Plan and City's Noise Ordinance requirements, stationary equipment must meet the Occupational Safety and Health Administration requirements to protect workers from hearing loss, which would also reduce noise exposure at surrounding uses. Therefore, impacts from HVAC systems and stationary equipment would be less than significant.

In addition to HVAC systems, new cannabis facilities also have the potential to generate noise from truck deliveries, such as engines idling and beeping from backup warning signals. Medium- or heavy-duty truck trips may be required for new business operations, including supply and product deliveries. State law currently prohibits heavy-duty diesel delivery trucks from idling more than 5 minutes (13 CCR 2485). Therefore, noise from idling would be limited to 5 minutes during truck deliveries. Noise levels measured at a typical loading dock registered 78 dBA Leq at a distance of 5 feet outside an open loading dock (ABC Acoustics 2018). A loading dock that generates a noise level of 78 dBA at 5 feet would have the potential to generate noise that may exceed typical conversational noise levels of 65 dBA up to 25 feet from the unit. As previously stated, new business would not be adjacent to most sensitive receptors and would generally be surrounded by existing commercial and industrial land uses that would provide at least a 25-foot setback from nearby residences. Additionally, the proposed Ordinance would limit deliveries to the hours of 9:00 a.m. through 9:00 p.m., and no late night deliveries would occur. Due to ordinance restrictions and distance, impacts on NSLUs related to truck deliveries and loading would be less than significant**.**

Noise sources from parking areas include car alarms, door slams, radios, and tire squeals. These sources typically range from approximately 51 to 66 dBA at a distance of 10 feet (Gordon Bricken & Associates 2012) and are generally short term and intermittent. Parking lots have the potential to generate noise levels that are audible above ambient levels depending on the location of the source; however, noise sources from a parking lot would be different from each other in kind, duration, and location so that the overall effects would be separate and, in most cases, would not affect noise-sensitive receptors at the same time. Additionally, parking lot noise from new cannabis facilities would be similar to parking lot noise from existing commercial and industrial uses in the project area. Impacts on NSLUs related to parking areas would be less than significant**.**

Noise from human activity at new cannabis facilities would be limited to normal conversation noise levels, which would generally be consistent with the City's Noise Ordinance and Santee General Plan Noise Element compatibility standards for surrounding land uses. No loitering that could result in gatherings would be allowed, and no nighttime or early morning (9:00 p.m. to 9:00 a.m.) retail and non-storefront retail (delivery) operations would be permitted. Therefore, noise levels would not exceed normal conversation levels at NSLU receptors, and impacts would be less than significant.

Commercial trash hauling would be provided by Waste Management, Inc., under a contractual franchise agreement with the City. New businesses would have on-site garbage and recycling dumpsters that may require multiple pickups per week. Waste Management, Inc., currently operates in the City, including the project area, and is subject to Section 5.04.130, Loading and Unloading Operations, of the City's Noise Ordinance, which prohibits waste collection vehicles from operating between the hours of 10:00 p.m. and 7:00 a.m. in such a manner as to cause a noise disturbance within or adjacent to a residential district. Additionally, individual pickup events would be short in duration and occur at most a few times per week in the vicinity of an individual receptor. Impacts would also be similar to existing commercial waste collection in the project area. Due to its intermittent nature, short duration, and compliance with the City's Noise Ordinance limitations, waste collection from cannabis facilities would not generate excessive noise levels at NSLUs. This impact would be less than significant.

Permanent Increase in Traffic Noise Levels

The following analysis is based on traffic data provided in the project-specific TIA (Appendix A). The analysis addresses the potential for the project to permanently increase traffic noise from construction of allowable cannabis uses under the proposed Ordinance and cumulative development projects. Traffic levels for each roadway are provided in Appendix A, Federal Highway Administration Noise Prediction Model Results, of Appendix E.

A substantial permanent increase would occur if implementation of the project were to result in an ambient noise level at 50 feet from the roadway centerline that exceeds the land use compatibility limits (Table 8) established in the Santee General Plan, including 65 dBA Ldn at the property line for residential properties and schools and 70 dBA Ldn for commercial uses and parks. For conditions where the roadway exceeds the standard without project implementation, a significant impact would occur if the project would result in an increase of 3 dBA or greater at 50 feet from the roadway centerline. The following presents a conservative analysis because actual noise levels at nearby receptors would decrease based on their distance from the roadway and would vary based on each individual receptor's location.

Existing noise levels and future increases in traffic on representative segments with implementation of the project are provided in Table 10, Existing + Cumulative + Project Traffic

Noise Levels. As shown in this table, five of the six roadway segments generate noise levels at 50 feet from the roadway centerline that exceed applicable thresholds without project implementation. However, implementation of the project would not result in an increase in noise levels on any roadway segment. A significant project-related traffic noise impact would not occur. This impact would be less than significant.

Table 10. Existing + Cumulative + Project Traffic Noise Levels

Roadway	Segment	Applicable Threshold (dBA Ldn)	Existing + Cumulative (dBA Ldn)	Exceeds Threshold without Project?	Existing + Cumulative + Project (dBA Ldn)	Increase in Noise Level from No Project Conditions	Significant Impact?
Mission Gorge Road	Western City limits to West Hills Parkway	65	72	Yes	72	0	No
	SR-125 to Fanita Drive	65	77	Yes	77	0	No
	Town Center Parkway to Cuyamaca Street	70	76	Yes	76	0	No
West Hills Parkway	Mast Boulevard to Mission Gorge Road	65	69	Yes	69	0	No
Cuyamaca Street	Mission Gorge Road to SR-52 ramps	70	75	Yes	75	0	No
N. Woodside Avenue	Riverford Road to Woodside Avenue	70	60	No	60	0	No

Source: Appendix E.

Notes: dBA = A-weighted decibel; Ldn = day-night average sound level; NA = not applicable; SR- = State Route

Unless otherwise noted, a substantial permanent increase in vehicle traffic noise would occur if implementation of the project would result in an ambient noise level that exceeds the applicable threshold established in the Santee General Plan. If the normally acceptable standard would be exceeded without project implementation, an increase of more than 3 dBA would be considered significant. Noise levels are calculated at 50 feet from roadway centerline. Noise levels are based on traffic data provided by LLG (Appendix E). Traffic levels for each roadway are included in Appendix D. dB levels are rounded to the nearest whole number. See Appendix D for datasheets.

b. Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant with Mitigation Incorporated. The main concerns associated with groundborne vibration from cannabis facilities are annoyance and damage during construction; however, vibration-sensitive instruments and operations can be disrupted at much lower levels than would typically affect other uses. In extreme cases, vibration can cause damage to buildings, particularly those that are old or otherwise fragile.

Groundborne vibration occurring as part of the project would result from construction equipment. Following construction, it is not anticipated that allowable cannabis facilities would require heavy equipment that would generate groundborne vibration. Therefore, only potential impacts from construction are addressed below. The City uses the Federal Transit Administration (FTA) groundborne vibration impact criteria, provided in Table 11, Vibration Source Levels for Construction Equipment, to determine if construction vibration impacts would be significant.

No specific construction projects are proposed under the project; however, it is likely that construction of buildings and/or redevelopment of structures would occur. Typical vibration levels for construction equipment that may be required for new cannabis facilities are provided in Table 11. Construction vibration is subject to the infrequent event criteria because operation of vibration-generating equipment is anticipated to be intermittent throughout the day in the vicinity of an individual receptor. As required by the City's Noise Ordinance, construction would occur during the daytime and would not disturb sleep. Therefore, the daytime use threshold of 83 vibration decibels (VdB) is applicable to most surrounding land uses, including residences. However, new cannabis facilities would be in existing commercial and industrial use areas that may include vibration-sensitive uses, such as medical facilities and manufacturing equipment. Therefore, construction is also subject to the threshold of 65 VdB for vibration-sensitive uses.

Table 11. Vibration Source Levels for Construction Equipment

Construction Equipment	Approximate VdB at 25 Feet	Approximate VdB at 60 Feet[1]	Approximate VdB at 235 Feet[1]
Hoe ram	87	76	58
Large bulldozer	87	76	58
Loaded trucks	86	75	57
Jackhammer	79	68	50
Small bulldozer	58	47	29
Vibratory roller	94	83	65

Source: FTA 2018.

Notes: VdB = vibration decibel

[1] Based on formula provided by the FTA (FTA 2018).

As shown in Table 11, vibration levels from all construction equipment would be reduced to 83 VdB or below beyond 60 feet from construction and reduced to 65 VdB or below beyond 235 feet from construction. The exact locations of future new cannabis facilities are unknown. Because the Ordinance would limit cannabis facilities to commercial and industrial zones, construction would generally be separated from existing residential structures by 60 feet. However, construction in existing commercial and industrial zones may occur within 235 feet of vibration-sensitive operations, such as medical facilities or manufacturing equipment. Vibration levels would have the potential to exceed the applicable FTA criteria; therefore, construction activities would result in a potentially significant temporary construction impact.

In addition to human annoyance, an impact related to architectural and structural damage to buildings would occur if existing buildings were affected by a peak particle velocity in excess of 0.2 inches per second, which is equal to approximately 94 VdB. As shown in Table 11, vibration levels from vibratory construction equipment would be reduced to below 94 VdB beyond 25 feet of construction equipment. Construction would be temporary and construction equipment would not be stationary at individual construction sites. It is not anticipated that individual pieces of construction equipment would generally operate within 25 feet of existing buildings or not generate vibration that exceeds 94 VdB at nearby sensitive receptors. Therefore, although construction would have the potential to result in significant nuisance impacts, as described previously, project construction equipment would not result in a significant impact related to structural damage.

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

Less than Significant with Mitigation Incorporated. MCAS Miramar and Gillespie Field are adjacent to the northern and southern City boundaries, respectively. The project would not include any components that would increase air traffic or require changes to existing air traffic patterns. The entire project area is outside all MCAS Miramar noise contours (SDCRAA 2011). Therefore, no impact would occur related to MCAS Miramar. However, portions of the project area, primarily between SR-125 and SR-67 and south of and along Mission Gorge Road, are within the 70–75 dBA Ldn airport noise contour for Gillespie Field (SDCRAA 2010). In accordance with Federal Aviation Administration standards, noise levels of 70 dBA Ldn would be incompatible with the proposed land uses unless additional noise-reducing features are incorporated into affected structures. Therefore, the project would have the potential to expose customers and workers to excessive aircraft noise levels within the 70–75 dBA Ldn noise contour for Gillespie Field. This impact would be potentially significant.

Mitigation Measures

Implementation of Mitigation Measures NOI-1 and NOI-2 would reduce temporary groundborne vibration impacts from construction activities at nearby receptors by requiring best practices during construction and pre-construction notification of residential receptors within the area. Implementation of Mitigation Measure NOI-3 would reduce impacts from aircraft noise by incorporating noise attenuation features at future cannabis facilities within certain noise contours of Gillespie Airport. Implementation of NOI-1 through NOI-3 would reduce noise impacts to a less than significant level.

NOI-1: Vibration Best Management Practices. Construction activities within 60 feet of a residence or 235 feet of a facility that uses vibration-sensitive equipment shall implement vibration best management practices to reduce vibration levels at nearby sensitive receptors. These best management practices shall be included in project construction

documents, including the grading plan and construction contract. Practices may include but not be limited to the following:

- Use only properly maintained equipment with vibratory isolators
- Operate equipment as far from sensitive receptors as possible
- Use rubber-tired vehicles as opposed to tracked vehicles

NOI-2: **Construction Vibration Notification.** The construction contractor shall provide written notification to residential receptors within 60 feet of construction activities and vibration-sensitive receptors within 235 feet of construction activities at least 3 weeks before the start of construction activities resulting in groundborne vibration. The notice shall inform receptors of the estimated start date and duration of daytime vibration-generating construction activities. The notification shall include information warning the receptors about potential impacts related to vibration-sensitive equipment and provide contact information to learn more about the vibration activities.

NOI-3: **Noise Level Reduction Features.** In accordance with Federal Aviation Administration standards, before issuance of a building permit for construction of cannabis facilities within the 70–75 A-weighted decibel day-night noise level noise contour of Gillespie Field, the applicant shall demonstrate to the City of Santee Director of Development Services that a 25-decibel noise level reduction (outdoor to indoor) has been achieved through the incorporation of noise attenuation features into the design of portions of buildings where noise levels are normally low, including areas where the public is received, office areas, noise-sensitive areas, and other areas that would not include industrial equipment operation. Potential noise reduction features may include but not be limited to enhanced ceiling and wall insulation and double- or triple-paned windows.

2.4.14 Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Environmental Setting

According to the California Department of Finance, the population has steadily increased in the City of Santee and the County of San Diego from 2010 to 2019 and slightly decreased between 2019 and 2020. Population, housing, and employment are anticipated to grow in both the City and the County over the next two decades. Specifically, SANDAG forecasts that the City population will reach 63,812 by the year 2035, which represents a growth of 10 percent, or 5,813 people.

Impact Analysis

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The Ordinance does not propose any specific development. Future cannabis facilities are intended to be locally serving resources for the City and would not include residential facilities that would induce unplanned population growth. The development of future cannabis facilities consistent with the Ordinance would be in accordance with the City's existing development patterns; thus, it is not anticipated that future cannabis facilities would directly (by proposing new residences) or indirectly (through expansion of infrastructure) induce population growth. Therefore, no impact would occur.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less than Significant Impact. The Ordinance does not propose specific development. The Ordinance would allow for permitting of future cannabis facilities in certain industrial and commercial zones within the City (General Commercial [GC], Light Industrial [IL], and General Industrial [IG] zones). No residential uses are allowed in these areas; however, there is potential for some non-conforming residences to be located in these zones. The City recently certified its

General Plan Amendment Housing Element (Sixth Cycle: 2021–2029), which states that the City meets the regional housing needs assessment, has a surplus of sites for residential development, and is at low risk for displacement. Minor displacement of non-confirming residences as a result of future cannabis facilities would be offset by the opportunity sites identified in the Housing Element and not necessitate the construction of replacement housing outside of the City. Therefore, impacts would be less than significant.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.15 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 new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Environmental Setting

Public services for fire protection, police protection, school, parks, and other facilities are described below.

Impact Analysis

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

Fire protection?

Less than Significant Impact. Fire protection and emergency medical services for the City are provided by the Santee Fire Department. Within the City limits, two fire stations and one fire administration building are staffed and operated by fire staff at the Santee Fire Department (City of Santee 2022). The Santee Fire Department also operates the following emergency services on a daily basis: three paramedic assessment engine companies, one paramedic assessment truck company, and two paramedic transport ambulances (24-hour units). The mission of the Santee Fire Department is "to protect life and property in our community through aggressive fire suppression, public education, and emergency medical services, with leadership and professionalism" (City of Santee 2022).

The Ordinance does not propose any specific development. Future cannabis facilities permitted under the Ordinance would be located in commercial and industrial areas that support similar types of uses. Development of future cannabis facilities would be required to comply with CBC standards, which includes site access requirements and fire safety standards. Future development would be subject to Santee Fire Department review through the Site Plan Review process to ensure that adequate emergency access and fire safety features are provided as part of the project. Additionally, future development would be required to comply with Santee Municipal Code, Title 12, Chapter 12.30, Development Impact Fees, which would offset impacts of new development on Santee Fire Department resources. The Ordinance would allow for the establishment of businesses that are compliant with the rules and regulations set forth by Ordinance, Section 7.04.260: Building Permits and Inspections, and Ordinance, Section 7.04.490: Inspection and Enforcement. In addition, the Santee Fire Department has reviewed the Ordinance and land use assumptions for the project and has verified that the Santee Fire Department can adequately serve the project with its current services and staff (Appendix F, Fire Will Service Letter). With incorporation of development fees and adherence to local and state regulations, impacts would be less than significant.

Police protection?

Less than Significant Impact. Police protection for the City is provided by the Santee Sheriff Station, which is contracted with the San Diego County Sheriff's Department. The Santee Sheriff's Station is located at 8811 Cuyamaca Street, serves as the City's police department, and provides a full range of law enforcement services, including patrol, traffic, investigations, parking enforcement, emergency services, crime prevention programs, crime analysis, and narcotics enforcement.

The Ordinance does not propose any specific development but would allow for the establishment of cannabis facilities pursuant to the rules and regulations set forth by the Ordinance, including Ordinance, Section 7.04.260, Building Permits and Inspections, and Ordinance, Section 7.04.490, Inspection and Enforcement. Future cannabis facilities permitted under the Ordinance would be located in commercial and industrial areas that support similar types of uses. Therefore, impacts would be less than significant.

Schools?

No Impact. The City is served by the Santee School District (Santee Elementary School District) and the Grossmont Union High School District. The Ordinance does not propose any specific development. Future cannabis facilities permitted under the Ordinance would not result in an increase of students in the City because no residential units are proposed that would bring new people into the area. Therefore, no impacts to schools would occur.

Parks?

No Impact. The Ordinance does not propose any specific development. Per the Ordinance, future cannabis facilities would not be allowed within 900 feet of existing parks. New cannabis facilities would not increase the volume of residents that may use public parks because no residential units would be proposed and there would be no population growth. Therefore, no impacts to parks would occur.

Other public facilities?

No Impact. The Ordinance does not propose any specific development. New cannabis facilities permitted by the Ordinance would not increase the volume of residents that may use other public facilities because no residential units would be proposed and there would be no population growth. Therefore, no impacts to other public facilities would occur.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.16 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Environmental Setting

Outdoor recreation resources in the City include public parks, public access lakes, bicycle paths, pedestrian trails, and ground-level linkages between recreation areas and urbanized places. Per the Santee General Plan Recreation Element, the City operates mini parks, neighborhood parks, and community parks.

Impact Analysis

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

No Impact. Future cannabis facilities permitted by the Ordinance would not impact the use of existing facilities because no residential units would be proposed and there would be no population growth. In addition, per the Ordinance, future cannabis facilities would not be allowed within 900 feet of existing parks or recreation facilities. Therefore, impacts to existing facilities would not occur.

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

No Impact. Future cannabis facilities permitted by the Ordinance would not cause the expansion of new facilities because no residential units would be proposed that would increase population growth and facilitate the need for new facilities; therefore, no impacts would occur.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.17 Transportation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

Environmental Setting

The City's circulation system is composed of freeways and their interchanges; arterial, collector, and local streets; public transportation; and non-motorized transportation. The key roadways for the project include Mast Boulevard, Carlton Oaks Drive, Mission Gorge Road, Prospect Avenue, West Hills Parkway, Fanita Drive, Carlton Hills Boulevard, Town Center Parkway, Cuyamaca Street, Magnolia Avenue, Woodside Avenue, and North Woodside Avenue.

Impact Analysis

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less than Significant Impact.

Roadways

A TIA was prepared for the project by LLG (Appendix A), which included a limited LOS analysis to identify project effects on the roadway operations in the project study area and to recommend project improvements to address noted deficiencies. The project does not propose any specific new development; however, it would allow cannabis facilities to be permitted within the City, consistent with the Ordinance. As identified in Table 12, Project Trip Generation, a realistic, worst-case scenario was developed to evaluate the project's impacts. A total of 20 facilities were assumed to be permitted by the Ordinance. At this time, the specific locations of the retail, microbusiness, manufacturing, testing, and distribution sites are not known, although they would occur in the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones.

As shown in Table 12, the project would result in approximately 4,427 net new ADT based on the land use assumptions described above.

Table 12. Project Trip Generation

Land Use	Average Square Feet per Facility	# of Proposed Facilities	Trip Rate		Total ADT
Retail	5,000	2	211.12	/KSF[a]	2,111
Microbusiness (w/ Retail)					
Distribution	2,000	2	1.4	/KSF[c]	6
Retail	5,000		211.12	/KSF[a]	2,111
Manufacturing	3,000		3.8	/KSF[c]	23
Microbusiness (w/Retail) Subtotal	18,000				**2,140**
Microbusiness (w/o Retail)					
Cultivation	10,000	2	0.69	/KSF[b]	14
Manufacturing	3,000		3.8	/KSF[c]	23
Distribution	2,000		1.4	/KSF[c]	6
Microbusiness (w/o Retail) Subtotal	13,000				**43**
Manufacturing	3,000	4	3.8	/KSF[c]	**46**
Testing	2,500	4	7	/KSF[c]	**70**
Distribution	2,000	6	1.4	/KSF[c]	**17**
				Total	**4,427**

Source: Appendix A.

Notes: KSF = 1,000 square feet

[a] Rates from the Institute of Transportation Engineers' Trip Generation Manual (11th Ed.) (Code 882: Marijuana Dispensary).

[b] Rates from the Institute of Transportation Engineers' Trip Generation Manual (11th Ed.) (Code 190: Marijuana Cultivation and Processing Facility).

[c] Rates from the County of Santa Barbara's Cannabis Land Use Ordinance and Licensing Program Final Environmental Impact Report, December 2017.

The TIA included a street segment analysis of Existing Conditions Plus Cumulative Projects Plus Project to assess the impact of the project on the near-term baseline. The following roadway segments were used for this analysis:

Mast Boulevard

1. SR-52 to West Hills Parkway
2. West Hills Parkway to Pebble Beach Drive

Carlton Oaks Drive

3. West Hills Parkway to Pebble Beach Drive

Mission Gorge Road

4. Western City Limits to West Hills Parkway
5. West Hills Parkway to SR-52/SR-125 Interchange
6. SR-52/SR-125 Interchange to Fanita Drive
7. Fanita Drive to Carlton Hills Boulevard
8. Carlton Hills Boulevard to Town Center Parkway

9. Town Center Parkway to Cuyamaca Street
10. Cuyamaca Street to Riverview Parkway
11. Riverview Parkway to Cottonwood Avenue
12. Cottonwood Avenue to Magnolia Avenue

Prospect Avenue

13. Fanita Drive to Cuyamaca Street
14. Cuyamaca Street to Magnolia Avenue

West Hills Parkway

15. Mast Boulevard to Mission Gorge Road

Fanita Drive

16. Mission Gorge Road to SR-52 Ramps
17. SR-52 Ramps to Prospect Avenue

Carlton Hills Boulevard

18. Carlton Oaks Drive to Mission Gorge Road

Town Center Parkway

19. Mission Gorge Road to Cuyamaca Street

Cuyamaca Street

20. River Park Drive to Town Center Parkway
21. Town Center Parkway to Mission Gorge Road
22. Mission Gorge Road to SR-52 Ramps
23. SR-52 Ramps to south of Prospect Avenue

Magnolia Avenue

24. Mast Boulevard to Riverview Parkway
25. Riverview Parkway to Mission Gorge Road
26. Mission Gorge Road to SR-52 Ramps
27. SR-52 Ramps to south of Prospect Avenue

Woodside Avenue

28. East of Magnolia Avenue

N Woodside Avenue

29. Riverford Road to Woodside Avenue

Table 13, Existing + Cumulative Projects Street Segment Operations, summarizes these street segment operations with the addition of project and cumulative project traffic.

Table 13. Existing + Cumulative Projects Street Segment Operations

Street Segment	Functional Capacity (LOS E)[a]	Existing + Cumulative			Existing + Cumulative + Project			Δ[e] V/C	Substantial Effect?
		ADT[b]	LOS[c]	V/C[d]	ADT	LOS	V/C		
Mast Boulevard									
1. SR-52 to West Hills Parkway	40,000	30,730	D	0.77	31,170	D	0.78	0.01	No
2. West Hills Parkway to Pebble Beach Drive	40,000	22,960	C	0.57	23,620	C	0.59	0.02	No
Carlton Oaks Drive									
3. West Hills Parkway to Pebble Beach Drive	15,000	7,830	C	0.52	8,050	C	0.54	0.01	No
Mission Gorge Road									
4. Western City Limits to West Hills Parkway	40,000	18,270	B	0.46	19,510	B	0.49	0.03	No
5. West Hills Parkway to SR-125	40,000	18,970	B	0.47	20,010	B	0.50	0.03	No
6. SR-125 to Fanita Drive	60,000	48,030	C	0.80	49,980	C	0.83	0.03	No
7. Fanita Drive to Carlton Hills Boulevard	60,000	43,030	C	0.72	44,380	C	0.74	0.02	No
8. Carlton Hills Boulevard to Town Center Parkway	60,000	40,160	C	0.67	41,470	C	0.69	0.02	No
9. Town Center Parkway to Cuyamaca Street	60,000	31,420	B	0.52	33,520	B	0.56	0.04	No
10. Cuyamaca Street to Riverview Parkway	60,000	26,850	B	0.45	27,900	B	0.47	0.02	No
11. Riverview Parkway to Cottonwood Avenue	60,000	27,770	B	0.46	28,820	B	0.48	0.02	No
12. Cottonwood Avenue to Magnolia Avenue	60,000	26,950	B	0.45	28,000	B	0.47	0.02	No
Prospect Avenue									
13. Fanita Drive to Cuyamaca Street	15,000	9,300	C	0.62	9,550	C	0.64	0.02	No
14. Cuyamaca Street to Magnolia Avenue	15,000	10,240	D	0.68	10,600	D	0.71	0.02	No
West Hills Parkway									
15. Mast Boulevard to Mission Gorge Road	40,000	13,460	A	0.34	14,330	A	0.36	0.02	No
Fanita Drive									
16. Mission Gorge Road to SR-52 Ramps	40,000	19,840	B	0.50	20,070	B	0.50	0.01	No
17. SR-52 Ramps to Prospect Avenue	40,000	12,260	A	0.31	12,490	A	0.31	0.01	No

Table 13. Existing + Cumulative Projects Street Segment Operations

Street Segment	Functional Capacity (LOS E)[a]	Existing + Cumulative			Existing + Cumulative + Project			Δ[e] V/C	Substantial Effect?
		ADT[b]	LOS[c]	V/C[d]	ADT	LOS	V/C		
Carlton Hills Boulevard									
18. Carlton Oaks Drive to Mission Gorge Road	40,000	25,990	C	0.65	26,490	C	0.66	0.01	No
Town Center Parkway									
19. Mission Gorge Road to Cuyamaca Street	40,000	21,230	C	0.53	21,290	C	0.53	0.00	No
Cuyamaca Street									
20. River Park Drive to Town Center Parkway	40,000	28,080	C	0.70	28,580	C	0.71	0.01	No
21. Town Center Parkway to Mission Gorge Road	50,000	24,250	B	0.49	24,700	B	0.49	0.01	No
22. Mission Gorge Road to SR-52 Ramps	50,000	42,640	D	0.85	44,200	D	0.88	0.03	No
23. SR-52 Ramps to south of Prospect Avenue	50,000	28,970	C	0.58	29,430	C	0.59	0.01	No
Magnolia Avenue									
24. Mast Boulevard to Riverview Parkway	40,000	23,590	C	0.59	24,030	C	0.60	0.01	No
25. Riverview Parkway to Mission Gorge Road	40,000	27,800	C	0.70	28,240	C	0.71	0.01	No
26. Mission Gorge Road to SR-52 Ramps	60,000	36,730	C	0.61	37,160	C	0.62	0.01	No
27. SR-52 Ramps to south of Prospect Avenue	40,000	13,100	A	0.33	13,770	A	0.34	0.02	No
Woodside Avenue									
28. East of Magnolia Avenue	40,000	28,160	C	0.70	28,400	C	0.71	0.01	No
N. Woodside Avenue									
29. Riverford Road to Woodside Avenue	10,000	3,520	A	0.35	3,780	A	0.38	0.03	No

Notes:

[a] Capacities based on City of Santee Roadway Classification and LOS table

[b] Average Daily Traffic

[c] Level of Service

[d] Volume to Capacity ratio

[e] Δ denotes a project-induced increase in the Volume to Capacity ratio

None of the study area street segments operate below a LOS D or lower in the existing condition. The TIA concludes that all street segments would continue to operate at a LOS D or better with the addition of the project and cumulative projects. The addition of project traffic would not cause any degradation of the street segments from existing conditions. In addition, future cannabis facilities would be located in commercial and industrial areas that were already planned for similar types of uses in the Santee General Plan, which assumed the generation of vehicle trips. Therefore,

the project would not conflict with a plan, policy, or ordinance addressing the City roadways, and impacts would be less than significant.

Transit, Bicycle, and Pedestrian Facilities

Transit service in the City is provided by San Diego Metropolitan Service and includes three bus routes (Routes 832, 833, and 834) and one light-rail trolley route (San Diego Trolley Green Line Route 530). Existing bicycle facilities currently serve the City along Mast Boulevard, Carlton Oaks Drive, Mission Gorge Road, Prospect Avenue and Woodside Avenue and provide east–west connections, while facilities along Carlton Hills Boulevard, Cuyamaca Street, and North Magnolia Avenue provide north–south connections. Newer streets in the City, particularly in the northern portion of the City as well as within the Town Center area along Mission Gorge Road, have sidewalks which are separated from the street and designed along landscaped corridors. Sidewalks are less prevalent in the older, southern areas. The City's current policy is to provide non-contiguous sidewalks on all new and widened streets of collector classification or larger. Pedestrian facilities include sidewalks, curb ramps, and other amenities such as street trees for shading and pedestrian scale lighting.

Implementation of the Ordinance would have the potential to increase demand for public transit, bicycle, and pedestrian facilities, reducing vehicle trips and VMT, by increasing employees and customers to the area using those facilities. However, future cannabis facilities would be located in commercial and industrial areas that were already planned for similar types of uses in the Santee General Plan that would have associated employees and customers. Similar to other allowed uses in the General Commercial (GC), Light Industrial (IL), and General Industrial (IG) zones, future cannabis facilities would be required to comply with the goals, policies, and objectives in the Santee General Plan Mobility Element related to alternative forms of transportation (Policies 1.1, 9.4). Due to the conceptual nature of future development, proposals would require individual assessments of potential impacts to City policies, plans, or programs supporting alternative transportation. Therefore, with compliance with Santee General Plan goals and policies, impacts would be less than significant.

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

Less than Significant Impact. The TIA prepared for the project by LLG (Appendix A) included a VMT assessment to address the requirements of California SB 743. SB 743 mandated VMT impacts be analyzed as a part of the CEQA Guidelines for transportation projects, replacing LOS as of July 1, 2020. The analysis methodology utilizes the recently certified City of Santee VMT Analysis Guidelines, April 2022, and the guidelines published by the Institute of Traffic Engineers, the California Office of Planning and Research, and other jurisdictions in the San Diego region.

Based on the City of Santee VMT Analysis Guidelines, April 2022, the requirement to prepare a detailed transportation VMT analysis applies to all discretionary land development projects that are

not exempt from CEQA, except for those that meet at least one of the following screening criteria: (1) projects located within a half-mile radius of a transit-accessible area, (2) small projects generating 500 or fewer net new daily trips, (3) projects in a VMT-efficient area within the City, (4) locally serving retail projects, (5) locally serving public facilities, (5) redevelopment projects with lower total VMT, and (6) infill affordable housing projects.

Different VMT screening criteria would apply to different land use types proposed under the Ordinance. As discussed, the project does not propose any specific new development; however, it would allow cannabis facilities to be permitted within the City, consistent with the Ordinance. The land use assumptions consistent with Table 14, Trip Generation per Facility by Land Use Type, were used for the VMT analysis. The following screening criteria apply to the project: locally serving retail and small projects. These criteria and how they apply to the project are discussed below.

Locally Serving Retail

According to the worst-case scenario, the Ordinance would allow a total of four retail facilities, including two retail only (with delivery) locations and two microbusiness with retail locations, each totaling approximately 5,000 square feet. A total of 20,000 square feet of retail is assumed in the worst-case scenario. Screening criterion (4), locally serving retail facilities, applies because these uses are less than 50,000 square feet. Therefore, the project's retail facilities would be screened out from a detailed VMT analysis and would have a less than significant impact.

Small Projects

According to the worst-case scenario, the Ordinance would allow for two microbusinesses without retail locations, four manufacturing locations, four testing locations, and six distribution locations. Each of these individual facilities would generate fewer than 500 ADT, as shown in Table 14. Screening criterion (2), small projects, would apply. Therefore, these land uses would be screened out from a detailed VMT analysis and would have a less than significant impact.

Table 14. Trip Generation per Facility by Land Use Type

Land Use	ADT per Facility[a]
Microbusiness without Retail	19 ADT
Manufacturing	12 ADT
Testing	18 ADT
Distribution	3 ADT

Source: Appendix A.

Notes:

[a] Based on the total project trip generation calculations summarized in Table 7-1 of Appendix A.

Based on the City of Santee VMT Analysis Guidelines, April 2022, the project would be screened out from preparing a detailed VMT analysis, and VMT impacts from the project would be less than significant.

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

Less than Significant Impact. The project does not propose any specific new development; however, it would allow cannabis facilities to be permitted in the City, consistent with the Ordinance. Design features of future facilities would need to be consistent with road design features in the City's existing circulation system. Through the City's environmental review process, development of future cannabis projects would be evaluated for potential safety impacts due to a geometric design feature or incompatible use. Therefore, impacts would be less than significant.

d. Would the project result in inadequate emergency access?

Less than Significant Impact. As discussed in Section 2.4.9, Hazards and Hazardous Materials, the City prepared an Emergency Operations Plan (City of Santee 2020) in compliance with the State Office of Emergency Services and the Santee Municipal Code, which identifies responses and actions depending on the nature and the scope of the disaster. Construction activities associated with future cannabis facilities permitted by the Ordinance would have the potential to interfere with emergency access and procedures if authorities are not properly notified, or multiple projects are constructed during the same time and multiple roadways used for emergency routes are concurrently blocked. Future cannabis facilities would be consistent with the current Santee General Plan land use designations, and therefore, no changes in the City's existing circulation network are proposed or required for implementation of the Ordinance. Future projects would be subject to City regulations regarding street design, site access, and internal emergency access. Compliance would prevent multiple roadways used for emergency routes from being concurrently blocked during construction and operation of future cannabis facilities. In addition, Ordinance, Section 7.04.320, Security Measures, includes a measure that requires cannabis facility emergency access and emergency evacuation plans to be in compliance with state and local fire safety standards. Therefore, impacts associated with inadequate emergency access would be less than significant.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

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

Environmental Setting

Cultural resources are found throughout the City and are reminders of the City's historical record. Cultural resources are the tangible or intangible remains or traces left by prehistoric or historical people who inhabited the San Diego region. They encompass both the built (post-1769) and the archaeological environments, as well as Traditional Cultural Properties. They are typically in protected areas near water sources and multiple ecoregions and can include Traditional Cultural Places, such as gathering areas, landmarks, and ethnographic locations. The following discussion is based on a cultural background check from the SCIC, a field reconnaissance survey of the areas that could support future cannabis facilities under the Ordinance (APE) conducted by a Harris & Associates archaeologist in April 2022, and AB 52 consultation conducted by the City.

Impact Analysis

a. 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:

i. 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), or

No Impact. No known Tribal Cultural Resources are present within the APE based on the background information provided by the SCIC and pedestrian survey that was conducted by a registered professional archaeologist. AB 52 consultation was initiated by the City of Santee on March 17, 2022. The City conducted AB 52 outreach with four Native American Tribes and organizations (Barona, Jamul, Mesa Grande, and Kumeyaay Heritage Preservation Council). No response was received from any of the Tribes or organizations that were contacted. In the absence of a response, it is assumed that there are no known Tribal Cultural Resources within the project area that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources. As such, there would be no direct impact. No impact would occur.

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

No Impact. No known Tribal Cultural Resources are present within the APE based on the background information provided by the SCIC and pedestrian survey that was conducted by a registered professional archaeologist. AB 52 consultation was initiated by the City of Santee on March 17, 2022. The City conducted AB 52 outreach with four Native American Tribes and organizations (Barona, Jamul, Mesa Grande, and Kumeyaay Heritage Preservation Council). No response was received from any of the Tribes or organizations that were contacted. In the absence of a response, it is assumed that there are no known Tribal Cultural Resources within the project area with significance to a California Native American Tribe. As such, there would be no direct impact. No impact would occur.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.19 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Environmental Setting

The source of drinking water supply for the PDMWD is from the San Diego County Water Authority, which receives the majority of its supply from the Metropolitan Water District of Southern California. The tap water customers receive from PDMWD is blended water from the Colorado River System, the California State Water Project, ocean water from the desalination plant and local watersheds within San Diego County (PDMWD 2020). Water travels through over 600 miles of aqueducts and 1,100 miles of pipeline to get to San Diego County. The PDMWD has a large infrastructure of its own, including over 300 miles of water mains, to provide water to residents of the City.

The City, through PDMWD, provides sewer service to residents and businesses in the Western Services Area, which includes the City of Santee as well as parts of the City of El Cajon and unincorporated community of Lakeside. Approximately 40 percent of the wastewater (sewage) is sent to PDMWD's Water Recycling Facility where it is treated and becomes part of the recycled water supply while approximately 60 percent of the wastewater collected travels from PDMWD's wastewater system into the City of San Diego's Metropolitan Wastewater System where it is treated at their Point Loma Wastewater Treatment Plant.

City-maintained storm drain systems include drain pipes, catch basins, and drainage channels. The City of Santee's Public Services Division of the Community Services Department is responsible for maintaining the City's storm drains, curbs, and gutters.

San Diego Gas & Electric provides electricity to the San Diego region, including the City. The City is currently served with electricity through both aboveground and underground transmission lines within City streets. San Diego Gas & Electric provides natural gas to the San Diego region, including the City. The City is currently served with natural gas through underground gas mains within City streets. The City is currently supplied with telecommunications services through various private companies. The infrastructure is typically located underground in vaults and conduit and aboveground on overhead power lines with pole mounted cables and transformers. Antennas may also be mounted in towers or on roofs.

The City's franchise waste hauler, Waste Management Inc., is responsible for the collection, removal, and disposal of solid waste for residential and commercial uses in the City. In addition, the hauler provides curbside recycling and yard waste collection, household hazardous waste disposal services, public education, and other services required to meet the waste management needs of the City. This includes the development of programs necessary to meet the state-mandated 50 percent waste reduction goal established by AB 939 (the California Integrated Waste Management Act of 1989).

Impact Analysis

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

Less than Significant Impact. The project does not propose any specific new development; however, it would allow cannabis facilities to be permitted in the City, consistent with the Ordinance. Future cannabis facilities would be connected to the existing domestic water supply system, wastewater infrastructure, and existing stormwater infrastructure. Overall, construction and operation of future cannabis facilities would require the use of water, wastewater treatment, electric power, natural gas, telecommunications, and wastewater and solid waste disposal. However, future cannabis facilities would be located in commercial and industrial areas that are planned for similar types of uses in the Santee General Plan and whose impacts on utilities and service systems have already been accounted for and infrastructure has been planned for in the Santee General Plan. In addition, as discussed in Section 2.4.6, Energy, future cannabis facilities that include cultivation would be required to demonstrate energy demand consistent with typical commercial or industrial uses as forecasted in the SSP to ensure new or expanded electric power infrastructure would not be required. Therefore, because future cannabis facilities would be compatible with existing Santee General Plan land use designations, impacts would be less than significant.

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

Less than Significant Impact. The PDMWD would provide water services to future cannabis facilities permitted under the Ordinance. Future cannabis facilities would be compatible with existing Santee General Plan land use designations. According to the PDMWD's Urban Water Management Plan (2020), the City is projected to have an adequate supply of water to meet the increase in demand. In addition, the City is projected to have enough water to meet demand during single-dry year and multiple-dry year scenarios, primarily through the implementation of the East County Water Purification Program (PDMWD 2020). The East County Water Purification Program is a collaborative effort between the PDMWD, City of El Cajon, County of San Diego, and Helix Water District. Notably, the East County Water Purification Program will create "a new, local, sustainable, and drought-proof drinking water supply by using state-of-the-art technology to produce up to 30 percent of East County's drinking water supply" (East County Water Purification Program 2022).

Water demand for commercial cannabis activities would result primarily from the cultivation and irrigation of cannabis, which has been characterized as being a high-water-demand activity (County of Santa Barbara 2017). However, cultivation of cannabis under the Ordinance would only be allowed as part of a microbusiness use in the Light Industrial (IL) and General Industrial (IG) zones and would not be allowed as an independent use. Thus, the number of cultivation sites in the City are assumed to be few (a total of two cultivation facilities as part of a microbusiness without retail were included in the realistic, worst-case scenario to evaluate the project's potential impacts). Therefore, due to the limited potential for cannabis cultivation in the City, impacts would be less than significant.

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

Less than Significant Impact. The City operates a 2-million-gallon-per-day wastewater treatment plant through the PDMWD's Ray Stoyer Water Recycling Facility. The remainder of wastewater from the City flows into the City of San Diego's Point Loma Wastewater Treatment Plant. Based on the PDMWD's Urban Water Management Plan (2020), the City's wastewater treatment facility has adequate capacity to serve new facilities under the Ordinance as part of the City's anticipated Santee General Plan growth projections. Permitted cannabis facilities would be consistent with the adopted Santee General Plan land use designations. Per the SWRCB, future cannabis facilities that include indoor cultivation would be required to obtain an Industrial Waste Discharge Permit from the PDMWD. The City could require mandatory pre-treatment prior to discharge into the sewer system (SWRCB 2018). Therefore, impacts would be less than significant.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact. Future cannabis facilities under the Ordinance would be consistent with the land use designations on the Santee General Plan and would result in solid waste generation similar to those planned uses. According to the Santee General Plan, non-hazardous solid and liquid waste generated in the City is currently deposited in the Sycamore Landfill, which is located in the northwestern region of the City at 8514 Mast Boulevard. Based on information provided by the California Department of Resources Recycling and Recovery (CalRecycle), the Sycamore Landfill has a maximum daily throughput of 5,000 tons per day and a remaining capacity of 113,972,637 cubic yards (CalRecycle 2019). It is anticipated that this landfill will have sufficient permitted capacity to service solid waste generated by future cannabis facilities. Therefore, impacts would be less than significant.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. Solid waste would be generated during future construction and operation of cannabis facilities. However, construction activities from future development would be subject to conformance with relevant federal, state, and local requirements related to solid waste disposal. Specifically, future projects would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to "reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible." AB 939 requires that at least 50 percent of waste produced is recycled, reduced, or composted. Local jurisdictions, including the City, are monitored by the state (CalRecycle) to verify if waste disposal rates set by CalRecycle are being met that comply with the intent of AB 939. Future projects would also be required to demonstrate compliance with CALGreen, which includes design and construction measures that act to reduce construction-related waste though material conservation measures and other construction-related efficiency measures. Compliance would be verified by the City through review of project plans and specifications. Lastly, the future cannabis facilities would be subject to compliance with all applicable solid waste handling, processing, and disposal requirements stipulated in Title 9, Chapter 2, Article 120, Solid Waste Management, of the Santee Municipal Code. Therefore, future projects would be required to comply with the City's efforts in reducing solid waste and with solid waste regulations at the state level. As such, impacts would be less than significant.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Environmental Setting

According to CAL FIRE's Fire Hazard Severity Zone Map Viewer (2021), the City is designated as a moderate to high, unzoned Local Responsibility Area. Several VHFHSZ are in the City, notably in the north/northwest and the south/southwest portions of the City. Areas where cannabis facilities may be located in the southwestern region of the City are adjacent to the VHFHSZ.

Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. As discussed in Section 2.4.9, the City has prepared its own Emergency Operations Plan (City of Santee 2020) in compliance with the State Office of Emergency Services and the Santee Municipal Code, which identifies responses and actions depending on the nature and the scope of the disaster.

Construction activities associated with future cannabis facilities would have the potential to interfere with emergency plans and procedures if authorities are not properly notified or multiple projects are constructed during the same time and multiple roadways used for emergency routes are concurrently blocked. Future cannabis facilities could be proposed for development in areas of the City adjacent to or in fire hazard areas. In the case of a wildfire evacuation, an increase in development, such as new cannabis facilities, would incrementally increase vehicular traffic on

evacuation routes. However, future cannabis facilities would be consistent with the current Santee General Plan land use designations, and therefore, no changes in the City's existing circulation network are proposed or required under the Ordinance. Future projects would be subject to site-specific review and City regulations regarding street design, site access, and internal emergency access. Compliance would prevent multiple roadways used for emergency routes from being concurrently blocked during construction and operation of future cannabis facilities. Therefore, impacts associated with the physical interference of an emergency response or evacuation plan would be less than significant.

b. Would the project, 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?

Less than Significant Impact. The Ordinance does not propose any specific development. However, development of future cannabis facilities on sites in Moderate to High Fire Hazard Severity Zone areas would be subject to wildfire hazards due to slope and prevailing winds based on the location, which would consequently result in fire-related risks to people and structures. Future cannabis facility locations in the southwestern region of the City are adjacent to the VHFHSZ. To minimize risk from wildfire, future development would be required to comply with the 2019 California Fire Code and the CBC to ensure safety and to not create risk toward humans or structures. Therefore, impacts would be less than significant.

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

Less than Significant Impact. The Ordinance does not currently propose any specific development. Future cannabis facilities permitted by Ordinance may require the installation of new water, emergency water, wastewater, stormwater, and natural gas infrastructure and connections to City infrastructure, although they would generally be located in existing developed commercial and industrial areas. Any new infrastructure components would be required to comply with applicable CBC and California Fire Code regulations. Implementation of the Ordinance would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, impacts would be less than significant.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less than Significant Impact. Any future development permitted by the Ordinance would be required to adhere to the CBC and other standards and regulations for building designs, which would minimize any potential risks associated with landslides. In addition, future cannabis facilities permitted by Ordinance would generally be located in existing developed commercial

and industrial areas within the City center in with low potential for landslides. Future development would be subject to City and state drainage and stormwater quality requirements that are designed to reduce stormwater runoff from project sites by promoting infiltrating, minimizing impervious surfaces, and requiring a no-net increase in flow. Therefore, future development would not expose people or structures to significant risk associated with post-fire landslides, mudflows, and flooding.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the project's implementation. As a result, no mitigation measures are required.

2.4.21 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 substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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 which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Impact Analysis

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

Less than Significant with Mitigation Incorporated. With the incorporation of mitigation measures, the project would not have the potential to degrade the quality of the environment, reduce the habitat of any sensitive plant or wildlife species, or eliminate important examples of California history or prehistory. As discussed in Section 2.4.4, Biological Resources, that the project would have the potential to impact sensitive plant and wildlife species, nesting birds, sensitive vegetation communities, and jurisdictional aquatic resources. Mitigation Measures BIO-1 through BIO-9 would be implemented to reduce impacts to biological resources to a less than significant level. As discussed in Section 2.4.5, Cultural Resources, the project has the potential to impact historical and archaeological resources due to the presence of sensitive cultural resources within areas that

could support future cannabis facilities. Mitigation Measures CUL-1 through CUL-3 would be implemented to reduce potential impacts on cultural resources to a less than significant level.

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

Less than Significant Impact. Implementation of the project would not result in individually limited or cumulatively considerable significant impacts. All resource topics associated with the project have been analyzed in accordance with CEQA and the CEQA Guidelines and were found to pose no impacts, less than significant impacts, or less than significant impacts with mitigation. In addition, taken in sum with other projects in the area, the scale of future cannabis facilities is small, and impacts to any environmental resource or issue areas would not be cumulatively considerable. Therefore, impacts would be less than significant.

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

Less than Significant with Mitigation Incorporated. As discussed in Sections 2.4.6, Energy, and 2.4.8, Greenhouse Gas Emissions, the project would have the potential to be inconsistent with the SSP due to the high energy use of indoor cannabis cultivation. Mitigation Measure ENE-1 would be implemented to reduce energy and GHG impacts to a less than significant level. As discussed in Section 2.4.7, Geology and Soils, the project would have the potential to impact paleontological resources if future facilities are to be located on sites with moderate to high paleontological sensitivity. Mitigation Measure GEO-1 would be implemented to reduce potential inadvertent discoveries of paleontological resources to a less than significant level. As discussed in Section 2.4.13, Noise, the project would have the potential to exceed FTA criteria for groundborne vibration during construction and potential to expose customers and workers to excessive aircraft noise levels within the 70–75 dBA Ldn noise contour for Gillespie Field. Mitigation Measures NOI-1 through NOI-3 would be implemented to reduce noise and vibration impacts to a less than significant level.

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